

# OPUS2

Fishmongers' Hall Inquests

Day 9

April 23, 2021

Opus 2 - Official Court Reporters

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1 Friday, 23 April 2021  
 2 (11.00 am)  
 3 JUDGE LUCRAFT: Good morning.  
 4 (In the presence of the jury)  
 5 Good morning, ladies and gentlemen. Nice to see you  
 6 all.  
 7 Good morning, Dr Ludlow.  
 8 Mr Armstrong, we'll pick up on where we got to  
 9 yesterday.  
 10 MR ARMSTRONG: Yes.  
 11 JUDGE LUCRAFT: Just so the jury know, you and I had  
 12 a conversation at the end of yesterday and I simply  
 13 explained to you I didn't want you to feel that you were  
 14 being rushed into putting documents. Equally, I didn't  
 15 want the witness feeling they were under pressure of  
 16 time in giving an answer, so that was really why I took  
 17 the decision to stop when we did.  
 18 MR ARMSTRONG: I'm grateful, sir, and I hope the message has  
 19 come to you, and I am sure it has through Mr Hough, that  
 20 I think I might need 30 minutes, but I won't go over  
 21 that.  
 22 JUDGE LUCRAFT: Yes, that's fine.  
 23 DR AMY LUDLOW (continued)  
 24 Questions by MR ARMSTRONG (continued)  
 25 MR ARMSTRONG: I'm very grateful.

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1 For the benefit of the transcript, and for you,  
 2 Dr Ludlow, I am still Nick Armstrong, representing Jack  
 3 Merritt's family.  
 4 Dr Ludlow, where we got to at the end of yesterday  
 5 was a discussion between you, an exchange between you  
 6 and I about, you were not willing to accept any category  
 7 exclusion around people who were enrolled on  
 8 Learning Together events or taken to Learning Together  
 9 programmes or events, and you told me that that was  
 10 unprincipled and unsupported by research to draw on. So  
 11 what you are doing, as I understand, is you are hanging  
 12 your hat on case-by-case, individualised risk  
 13 assessment?  
 14 A. Yes, I'm saying that the offence for which someone is  
 15 convicted, I understand that to be a relevant factor  
 16 within --  
 17 Q. Certainly.  
 18 A. -- a risk assessment, but one of many factors, and so  
 19 I am suggesting that my understanding of the evidence is  
 20 that an individualised risk assessment, which  
 21 incorporates static and dynamic risk factors is  
 22 a stronger mechanism for careful evaluation of risk.  
 23 Q. Well, just to be clear, I put a number of proposed  
 24 categories to you yesterday, not just the type of  
 25 offending, but also high risk estate, category A, or

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1 high risk category A or indeed somebody who is high risk  
 2 category A and about to come out, but you didn't want  
 3 category definitions, you wanted individualised risk  
 4 assessment; yes?  
 5 A. Yes.  
 6 Q. Now, just so we know exactly what that approach looks  
 7 like in this case, I know we've seen a couple of these  
 8 documents before, I just want to go back to how that  
 9 looks here, can we just have up, please, {DC6682/1},  
 10 which is Usman Khan's original application form.  
 11 Mr Hough showed us that yesterday, I just want to go  
 12 back to it first of all.  
 13 Now, we see that that's a document that goes to  
 14 Gina Butler who is the head of learning and programmes  
 15 at Whitemoor, isn't she?  
 16 A. Yes.  
 17 Q. And we will come back to her evidence in a moment. Can  
 18 we just note there first of all, this application form  
 19 Mr Hough went through yesterday, he gives his name, his  
 20 prison number, he gives his ethnicity as "Kashmiri",  
 21 which might be an interesting thing, but somebody might  
 22 want to go explore that, and then if we just go through  
 23 to the end where the pages are, where the numbered pages  
 24 are, because Mr Hough went through the documents where  
 25 he says he was wanting to do creative writing. Can

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1 I just ask this to be flicked through until we get to  
 2 the table {DC6682/2}. So that's where Mr Hough went  
 3 yesterday, and I just wanted to go back to the table at  
 4 the end {DC6682/3}. That's right. And we are back to  
 5 how he feels about himself and you'll remember my  
 6 questions about measuring in terms of self-efficacy.  
 7 This says:  
 8 "These questions give a sense of how you feel about  
 9 yourself and about learning."  
 10 And you can see, Dr Ludlow, that how he answers  
 11 these is he scores himself rather highly. He scores  
 12 himself at 9 on almost all of them, a couple of 8s, and  
 13 then if you flick to the next page, the only area where  
 14 he slips below that is the final 6 where he says:  
 15 "I feel I do not have much to be proud of."  
 16 He is a bit equivocal about that, presumably  
 17 indicating that he might have stuff to be proud of. Now  
 18 this is a programme that is designed to make people feel  
 19 better about themselves; I'm gently putting to you that  
 20 this might be a man who already thinks quite well of  
 21 himself?  
 22 A. So to be clear, it's not a programme that seeks to make  
 23 people feel better about themselves; it's an educational  
 24 initiative with clear learning outcomes, and to be  
 25 clear, these measures at the back are concern

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1 evaluation, they're not considered as part of the  
 2 application process, so I'm not suggesting that they're  
 3 relevant to any risk assessment that my HMPPS colleagues  
 4 would make.  
 5 Q. But you say there, I mean, you are very clear, aren't  
 6 you, that this is a learning exercise, an educational  
 7 exercise, not a rehabilitative exercise?  
 8 A. I'm clear that we are seeking to provide education, yes.  
 9 Q. I will come back to that.  
 10 We then have a compact, which I'm going to ask to be  
 11 brought up in a moment, but before we do that, can  
 12 I just see how the compact is described, this process is  
 13 described by Ms Butler to whom it goes, and you will  
 14 know Ms Butler, no doubt. Can I have her witness  
 15 statement up, that's {WS5053/1} and I want to just go to  
 16 paragraph 9 first of all, just very briefly {WS5053/4}.  
 17 If we go to the next page, so this is where she's  
 18 discussing applications for Learning Together, and  
 19 I just want — that application form that I just showed  
 20 you, Dr Ludlow, doesn't ask any questions about what the  
 21 offence was?  
 22 A. No, that's right.  
 23 Q. And Ms Butler gives the explanation for this. She says:  
 24 "I note that the form used when the programme first  
 25 rolled out did not require a security category, but

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1 I cannot be sure if future versions did. I expect not.  
 2 The reason for this is that it was considered to be in  
 3 conflict with the principles of Learning Together in  
 4 that asking a resident to give these details could  
 5 create feelings of stigma and shame."  
 6 So that was a deliberate decision not to make these  
 7 residents, these inmates, prisoners, think badly of  
 8 themselves?  
 9 A. So in the design of the form, which was designed in  
 10 collaboration with our HMPPS colleagues, that  
 11 information was considered to be sensitive and  
 12 information that the prison already had. So it's not  
 13 information that's relevant to our academic  
 14 decision-making, which is what that form is for, it's  
 15 relevant to our HMPPS colleagues and they of course  
 16 already have an accurate description of that through  
 17 NOMIS and other records.  
 18 Q. I may need to put this to you at several points, and  
 19 I opened my questions yesterday saying of course risk  
 20 assessment is predominantly a matter for the statutory  
 21 agencies, and of course they have access to information  
 22 that you don't, but you are also running these  
 23 programmes, you also have your students there, and in  
 24 due course, you will have events on the outside, and as  
 25 Mr Pitchers put to you, you are an employer. Now, you

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1 must yourself have some interest in risk assessment?  
 2 A. I do, as an educator.  
 3 Q. Right. Can I just now go to paragraph 13 of this  
 4 witness statement, because I want to look at — this is  
 5 where we see some discussion of the compact that he is  
 6 required to sign before he is allowed on  
 7 Learning Together, {WS5053/6}, and she says this:  
 8 "In planning for the roll out of Learning Together  
 9 at ... Whitemoor..."  
 10 So this is when it's being rolled out from Grendon  
 11 to Whitemoor:  
 12 "... we paid attention to ensuring that suitable  
 13 security arrangements were in played in order to protect  
 14 all parties."  
 15 So she is thinking with you, it seems, about  
 16 security arrangements:  
 17 "Much of this work had already been thought through  
 18 by Dr Ludlow and Dr Armstrong, most likely as a result  
 19 of their understanding of prisons based on previous  
 20 experiences in these environments. It is because of  
 21 this that they had already had documentation such as  
 22 compacts and student policies, and these that acted as  
 23 the foundations for the documents used at Whitemoor  
 24 provided by Dr Ludlow and Dr Armstrong."  
 25 And there's a reference there, and which is

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1 {DC5085}, which I'm not going to ask to come up, because  
 2 Mr Hough went to that in some detail yesterday, but I do  
 3 want to briefly go back to the compact, because what I'm  
 4 putting to you is she was saying that this was  
 5 a discussion, it was a discussion about how to produce  
 6 security, and the compact was one of the results of this  
 7 following a conversation with you as a result of your  
 8 experiences at Grendon.  
 9 Now, if we go to the compact and see what that  
 10 produced, it's {DC6681/1}. Now says  
 11 "University of Cambridge & Whitemoor" and it has the  
 12 stamp of University of Cambridge and Learning Together  
 13 and HMPPS. Go to the next page, please {DC6681/2}.  
 14 What this requires is this convicted terrorist,  
 15 potentially deceptive, "High Risk Khan", as he has  
 16 become known, individual, simply to say he understands  
 17 that Learning Together isn't an official or accredited  
 18 course, he confirms that he has participated in  
 19 an induction, he has undertaken to abide by all the  
 20 prison and university rules, not to bring restricted  
 21 items in, concerns about personal safety are to be  
 22 reported and that he is able to attend all scheduled  
 23 sessions.  
 24 If that is the result of the discussion on security,  
 25 that is a very weak and probably zero protection against

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1 anything, isn't it?  
 2 A. The main protection, of course, is that we're  
 3 undertaking these classes within the prison environment  
 4 that have a raft of relevant security arrangements.  
 5 This compact is enhancing those considerable  
 6 arrangements that regulate all aspects of prison life,  
 7 and this document is drafted from an educational  
 8 perspective, so it clearly has a focus on those  
 9 activities and our role within that context.  
 10 Q. But you do think it enhances security, that document?  
 11 A. I think it enhances security by clearly asking all  
 12 participants to comply with all prison and university  
 13 rules, prison rules being extensive.  
 14 Q. I see.  
 15 A. And — and agreeing to abide by the values and  
 16 expectations that we set out clearly in the induction  
 17 process.  
 18 Q. Can I just draw your attention to another part of this.  
 19 Can we just see the bottom half of this form. We saw  
 20 that this was a stamped document for both you and the  
 21 Prison Service. If you go below the signature. So  
 22 that's signed by Usman Khan on 1 November 2017, but the  
 23 space for the security department to have signed is not  
 24 complete.  
 25 A. That's very common. So what happened once they were

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1 completed is they were shared with the security  
 2 department. In some cases they were then added to  
 3 people's core file, so core prison file.  
 4 Q. In some cases.  
 5 A. That was a matter for the prison service, but that — it  
 6 was signed by the resident.  
 7 Q. I understand.  
 8 A. And it was signed in the presence of colleagues from  
 9 security who attended that induction session. I think  
 10 it's clear that the person is agreeing to comply with  
 11 its content.  
 12 Q. I understand, Dr Ludlow, but it's clearly intended for  
 13 the security department to sign it, and I completely  
 14 understand and everybody who works in this area will  
 15 understand that things get missed and not everything  
 16 gets signed and sometimes the systems don't work as  
 17 intended, but that is rather the point: if you rely on  
 18 an individualised approach, the chances of these kind of  
 19 dropped balls, of which this is only a small example, is  
 20 very real, isn't it?  
 21 A. I think you are using an example of a form not being  
 22 signed to suggest something that is quite a few steps  
 23 removed. You're right to say that this form hasn't been  
 24 signed, but it's also true that Usman participated in  
 25 many activities with us in Whitemoor and there were no

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1 breaches of any — there was no concern for his safety  
 2 or the safety of others who participated in that  
 3 activity at any time.  
 4 Q. I'm going to move on to a new topic, Dr Ludlow, but  
 5 staying with the question of how effective you can be  
 6 when you apply an individualised approach.  
 7 Learning Together, as we have seen, and we've had  
 8 people like, for example, His Honour Judge Samuels here,  
 9 had a lot of support and have a lot of support from the  
 10 criminology community and from the prison community?  
 11 A. Yes, it does.  
 12 Q. Can I just deal with some of this. There is somebody  
 13 called Jamie Bennett, who you have referred to in your  
 14 evidence, I just want to deal briefly with him. Can we  
 15 just have his witness statement up, please, it's  
 16 {WS5007}, and he says there, he is very senior, that's  
 17 the reason why I'm going to him, is he is Jamie Bennett,  
 18 Head of the operational security group at the Ministry  
 19 of Justice, and he says he joined the Prison Service in  
 20 1996, he was governor of Grendon, which I think is  
 21 probably where you came across him?  
 22 A. That's right.  
 23 Q. And then he went to Long Lartin, which was a category A  
 24 prison, and then he was — I think after that he went  
 25 into the Ministry of Justice as the deputy director for

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1 security, order and counter—terrorism.  
 2 Now, can we just go to paragraph 5 of that witness  
 3 statement?  
 4 A. May I add, Mr Armstrong, another thing that might be  
 5 relevant: he was deputy governor, I believe, at  
 6 Whitemoor Prison, so some of our conversations about the  
 7 roll out of the programme from Whitemoor stem from  
 8 a conversation with him about its suitability.  
 9 Q. That's all very helpful, and what I am asking about is  
 10 if you look at what he says about you, paragraph 5:  
 11 "I had regular contact with Ruth Armstrong and Amy  
 12 Ludlow as part of the Learning Together programme...  
 13 I met with them regularly in order to review progress  
 14 informally and to discuss possible developments at the  
 15 prison."  
 16 That's the first point.  
 17 Can I now do paragraph 10 {WS5007/2}, I'll put these  
 18 to you and then ask you a question about them at the  
 19 end. Paragraphs 10 where it says:  
 20 "... they listened carefully to issues around risk  
 21 and security. They developed an induction programme in  
 22 order to set security expectations for programme  
 23 participants ..."  
 24 And he gives the example there of somebody being  
 25 excluded.

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1 Now, underneath that you've got paragraph 11:  
 2 " ... there was informal feedback... to maintain  
 3 appropriate boundaries..."  
 4 Do you see?  
 5 A. (The witness nodded).  
 6 Q. Now, he was talking about informal feedback. Did Mr --  
 7 I think it's Dr Bennett, isn't it?  
 8 A. It is.  
 9 Q. Did he give you, at any stage, in any of those  
 10 conversations, any warning about moving from Grendon to  
 11 category A, moving into high risk category A or dealing  
 12 with people who were about to be released from high  
 13 security conditions?  
 14 A. So at the time when we just had those conversations with  
 15 him, he was governing Grendon, so it wouldn't probably  
 16 be appropriate for him to deal with that as a question,  
 17 it would be appropriate for the governor of Whitemoor to  
 18 make the decision about whether or not partnership was  
 19 right.  
 20 Q. At any other stage did he say: Amy, be careful, these  
 21 guys are different?  
 22 A. No, and I wouldn't have expected him to say that.  
 23 Q. You wouldn't?  
 24 A. Had he -- and largely because Jamie is a very  
 25 experienced operational leader, and he is used to

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1 dealing with people across the high security estate, and  
 2 he probably recognises that many of the men at Grendon,  
 3 he had met previously in the high security estate.  
 4 Q. No doubt he can be inspirational, but here I want him to  
 5 be hard-edged, Dr Ludlow.  
 6 Can we just deal next with Governor Styles, who was  
 7 the governor of the category A prison --  
 8 A. Whitemoor.  
 9 Q. -- of Whitemoor. Can we have his witness statement, his  
 10 is {WS5010/1} and can we go to paragraph 9 of that  
 11 {WS5010/3}. He talks there about:  
 12 "Usman Khan applied to take part in  
 13 Learning Together. That application needed support, or  
 14 at least no substantial objection, from [CT] managers."  
 15 He then says this:  
 16 "Mr Khan was mentioned during a number of  
 17 discussions as being someone who could benefit greatly  
 18 if he were to engage with the programme, although there  
 19 were some doubts, given his offence, as to whether he  
 20 would do so. The discussions were between myself, Steve  
 21 Machin... Gina Butler... Ruth Armstrong and Amy Ludlow.  
 22 The discussions were focused on the risk involved,  
 23 public perception, safeguarding students, possible gains  
 24 for Mr Khan in taking part and ethical issues of denying  
 25 someone an educational opportunity because of their

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1 offence history."  
 2 What was the public perception concern?  
 3 A. I don't recall any specific conversation, so I think  
 4 that's probably a question that's better answered by  
 5 Mr Styles.  
 6 Q. Yes. He talks about ethical issues of denying someone  
 7 an educational opportunity; is that something you  
 8 recognise?  
 9 A. Not from those particular discussions, I am afraid not.  
 10 Q. Right. Did he at any stage say to you that this is --  
 11 you have to be very careful because category A, high  
 12 risk, all of that, needs to be treated differently? You  
 13 can't take the same approach to him as you take in  
 14 Grendon?  
 15 A. Mr Styles was governing the prison. He's responsible  
 16 for safety of everybody who works in there so he, of  
 17 course, cared very much that this was a programme of --  
 18 a partnership that was safe. He relied significantly on  
 19 his staff, of course he is running the prison, but he  
 20 has a wide staff of --  
 21 Q. I am interested in his conversations with you.  
 22 A. I don't recall a specific conversation, but in all of my  
 23 conversations with Mr Styles, I have understood that he  
 24 cares very much, and sees himself as entirely  
 25 responsible for the safety of everyone in Whitemoor.

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1 Q. But what I'm interested in is something very specific,  
 2 Dr Ludlow. What is astonishing about this case is  
 3 Mr Khan, "High Risk Khan", category A, 0.1% of the  
 4 prison population, was doing something very unusual: he  
 5 was coming out of prison directly from those specialist  
 6 conditions. That made him a very, very particular case  
 7 and very unusual. Did Mr Styles at any stage, who knows  
 8 what Learning Together do, who comes to your events,  
 9 knows where they are, knows what kinds of things they  
 10 are, say to you: be careful with this guy?  
 11 A. He wanted there to be care taken and that's why he asked  
 12 his security department to do their job.  
 13 Q. All right. And that was done by -- well, can I just  
 14 finish off with paragraph 10 of this witness statement.  
 15 The consequence of these conversations were, fourth line  
 16 down:  
 17 "There would need to be exceptional risks and  
 18 reasons to justify denying someone access to education."  
 19 Was that the threshold that was being applied:  
 20 exceptionality?  
 21 A. I am afraid you're going to have to ask Mr Styles.  
 22 That's not my evidence and I can't speak to it.  
 23 Q. Mr Machin, who we'll hear from next week, who was the  
 24 head of security, counter-terrorism and  
 25 counter-corruption, he did the sift, is what I think his

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1 evidence will be, and he was the person who has access  
 2 to all the material you do not have access to, which is  
 3 the security information?  
 4 A. Yes.  
 5 Q. Did Mr Machin have this kind of conversation with you,  
 6 that said: be very careful of this guy, he's different?  
 7 A. Mr Machin did the sift. He shared any information with  
 8 us that was relevant. There was no specific  
 9 conversation that I recall about Usman, and that's  
 10 perhaps largely because Usman wasn't that distinct  
 11 within the Whitemoor population.  
 12 Q. As Mr Hough alluded to this yesterday, and we will be  
 13 dealing with it with other witnesses, very shortly  
 14 before he was released, before Mr Khan was released,  
 15 around 29 October, he came into the prison about a week  
 16 later, there was intelligence that suggested that he  
 17 was, and the expression is, going to, intending to,  
 18 return to his old ways on release, which was interpreted  
 19 as meaning a terrorist threat.  
 20 Now, I'm not suggesting at all that that would be  
 21 given to you, because it's intelligence, but was there  
 22 any warning or any indication of enhanced scrutiny or  
 23 anxiety from Mr Machin to you in around November 2018?  
 24 A. No.  
 25 Q. Thank you. Now, these are all senior people who know

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1 these things, but it goes beyond that because you were  
 2 supported, weren't you, by an innovation grant from the  
 3 Ministry of Justice?  
 4 A. We were.  
 5 Q. So you had very high level, including financial support,  
 6 from the Ministry of Justice?  
 7 A. Yes, through that grant. We were given a grant, yes.  
 8 Q. Can I just pull up Mr Vince's witness statement, which  
 9 is {WS5067/27}, which is paragraph 84. That says there:  
 10 "Learning Together were awarded an Innovation Grant  
 11 for the period... April 2018 to... March 2020... new  
 12 initiative, run as an open competition funding activity  
 13 with the objective of enabling the voluntary sector to  
 14 contribute to better outcomes..."  
 15 And then it is funded for a total of just shy of  
 16 £214,000 over those two years.  
 17 I just want to go to some features of that.  
 18 Firstly, {WS5067/81} of this witness statement, which is  
 19 one of the exhibits, if we can go to that. You were  
 20 being paid that money for these things, these were the  
 21 agreed outputs and outcomes:  
 22 "1. [The] offenders can access an imaginative and  
 23 wide-ranging curriculum which covers a range of subject  
 24 areas and academic ability.  
 25 "2. Offenders' interest in and commitment to the

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1 learning process is sustained.  
 2 "3. There are improved rates of  
 3 retention/completion in prisoner education."  
 4 That is the way you measure the success of your  
 5 courses? These are the outcomes you are seeking?  
 6 A. So for this particular grant we were saying those are  
 7 the things that we will be interested in to try and  
 8 achieve, yes.  
 9 Q. It's very general?  
 10 A. Yes, in the way of these things. This is very common  
 11 for grants to require those sorts of outputs and  
 12 outcomes.  
 13 Q. Can we also just look briefly at page 64 of this  
 14 {WS5067/64} because, as I've already touched on, you  
 15 were very clear, both to Mr Hough and also to  
 16 Mr Pitchers yesterday, and you have been again clear  
 17 about it this morning, that this is only about  
 18 education, you are not rehabilitation. The background  
 19 and purpose of this grant, see the final line of  
 20 paragraph 1.1 is:  
 21 "We are now inviting applications for one-off  
 22 grants... to support offender rehabilitation."  
 23 The purpose of this grant was rehabilitation; it's  
 24 not pure education?  
 25 A. No, the purpose of the grant funding was for HMPPS to

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1 support things that they thought had rehabilitative  
 2 outcomes. We have been clear that we are an educational  
 3 organisation, we are providing education, and we are  
 4 also clear that education can have rehabilitative  
 5 outcomes, but if your focus is education, it doesn't  
 6 necessarily follow that my focus is also rehabilitation.  
 7 I'm open to the possibility and I'm very interested in  
 8 the possibility that it promotes desistance of course.  
 9 Q. You were being funded for rehabilitation purposes?  
 10 A. This funding was to support rehabilitation, and we  
 11 applied for it on the basis that education can support  
 12 rehabilitation, but that doesn't take away from the  
 13 point that what we were doing was education; it wasn't  
 14 an intervention to reduce criminal risk.  
 15 Q. Okay. I want to finish this section by just emphasising  
 16 this: you told Mr Pitchers yesterday that you, at the  
 17 time of this event, you had only 20 or so released  
 18 prisoners and only one of those was a TACT offender?  
 19 A. Yes.  
 20 Q. So this was the first time Learning Together had ever  
 21 done anything like this?  
 22 A. It was the first time we had a TACT -- a person with  
 23 a known TACT conviction in the community working with  
 24 us.  
 25 Q. And still nobody said to you, all of these senior people

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1 said: be careful, watch this guy very closely?  
 2 A. So partly I think the care comes through the fact that  
 3 he's supervised by MAPPA, so unlike many of our other  
 4 people who are released under normal probation  
 5 supervision, Usman is released to MAPPA supervision  
 6 which incorporates --  
 7 Q. I understand.  
 8 A. -- the feedback from the security services and the  
 9 police.  
 10 Q. Dr Ludlow, I absolutely will have questions for MAPPA  
 11 too, but you also have your responsibility to those you  
 12 work with. That's the point I'm putting.  
 13 Can I just ask about this. I'm wondering why that  
 14 happens and how this process happens and I wonder about  
 15 how it works in the context of where we want, on your  
 16 approach, individualised case assessment is very  
 17 careful, often difficult, because it is dealing with  
 18 people who might be deceptive, very sober, hard-edged  
 19 decision-making, and I ask about that is there may be  
 20 a tension between wanting to move somebody like  
 21 Usman Khan on, wanting to believe in him, hoping that he  
 22 will achieve things, but also holding him back against  
 23 his interests, against what he is saying, because there  
 24 are security reasons for doing so. There is a tension  
 25 there. That's not an easy thing always to do, is it?

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1 A. It's not an easy thing and that's why I would say it's  
 2 very important that distinct groups of people with  
 3 distinct responsibilities and power manage those things.  
 4 Q. Indeed. And you say that they are distinct from you:  
 5 you are doing a learning thing and they are doing  
 6 a security thing?  
 7 A. Yes.  
 8 Q. I want to be clear about that, though. You and Ruth  
 9 Armstrong both have security clearance,  
 10 counter-terrorist clearance within the prison, you can  
 11 take keys and you tell us you can go to meetings and  
 12 discuss sensitive matters?  
 13 A. The latter I would phrase more carefully --  
 14 Q. Those are the words in Ruth Armstrong's witness  
 15 statement.  
 16 A. They're not my words.  
 17 Q. All right.  
 18 A. That I can draw keys is absolutely true and  
 19 I'm a trusted outsider, that is also true of the  
 20 Samaritans, who do listening for self-harm and suicide  
 21 protection, it's also true of volunteers through the  
 22 chaplaincy and many other educational organisations.  
 23 Q. I can't deal with it in great detail this morning, but  
 24 we will deal with the extent to which many witnesses  
 25 describe their friendly relations with you and with

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1 Ruth; yes?  
 2 A. Yes, we have warm and supportive relationships with our  
 3 students.  
 4 Q. Governor Styles was doing his masters degree at the  
 5 Institute of Criminology at Cambridge at the time?  
 6 A. He was.  
 7 Q. He was writing his thesis on the importance of hope at  
 8 the time?  
 9 A. Yes.  
 10 Q. Who supervised that thesis?  
 11 A. I don't recall.  
 12 Q. It wasn't you?  
 13 A. It wasn't me, no.  
 14 Q. Was it Dr Armstrong, do you know?  
 15 A. No.  
 16 Q. Gina Butler was also doing her masters degree, the other  
 17 person involved in the sift process, doing her masters  
 18 degree at the Institute of Criminology, and you were her  
 19 supervisor?  
 20 A. No, I wasn't her supervisor.  
 21 Q. I think she says that you were in her witness statement.  
 22 A. I was the director of the course of which she was part;  
 23 I wasn't supervising her.  
 24 Q. All right, well I'll come back to that because there is  
 25 a reference in a moment to that.

23

1 A. My colleague Lucy Willmott was her supervisor, just to  
 2 be clear.  
 3 Q. Okay, but you were involved in the supervision?  
 4 A. I was director of the course, so I was running the whole  
 5 programme.  
 6 Q. You said yesterday in response to some criticisms I put  
 7 to you about the articles and their language, that all  
 8 of that was academically rigorous and refereed?  
 9 A. Yes.  
 10 Q. That was in the context of an article in the Prison  
 11 Service Journal?  
 12 A. Yes.  
 13 Q. The editor of whom is Jamie Bennett?  
 14 A. Yes, he is --  
 15 Q. And you and Ruth are on the editorial board?  
 16 A. We are.  
 17 Q. Isn't this all just a bit close to do this rigorous  
 18 exercise? Aren't you all just too close to each other?  
 19 A. So other articles that you could have mentioned are  
 20 published in other journals, and you are right, of  
 21 course, that the field in which I work is highly  
 22 networked. That is one of its strengths, as much as  
 23 perhaps one of its weaknesses, as you are suggesting,  
 24 but many senior leaders have taken the MST programme in  
 25 penology across prison and probation services, and

24

1 overall I would characterise that as a huge strength,  
 2 because what we're trying to do is bridge the gap  
 3 between practice, policy and research to enable us to  
 4 have better joined up conversations.  
 5 Q. I'm putting to you that there are fairly serious risks  
 6 associated with this. There may be benefits, but there  
 7 are risks that come with it?  
 8 A. It's important that everybody is clear on what job  
 9 they're doing and are not corrupt, yes.  
 10 Q. I'm getting to the end. I'm just going to put one  
 11 particular example of this because what I'm concerned  
 12 about here, so we're clear, are blurred boundaries and  
 13 people do know where their functions begin and end. Can  
 14 I just have {DC6384/1}, and can we just be at  
 15 {DC6384/152}. This is from January 2019, this is  
 16 an email that you're involved with, Ruth Armstrong is  
 17 also involved with it, and it comes out of a course that  
 18 was run, it was one of the Writing Together courses at  
 19 Whitemoor, Dr Ludlow, and it's around the time, because  
 20 you can see in the email chain, it's around the time  
 21 that they're talking about Madingley Hall, which  
 22 Mr Pitchers asked you about yesterday.  
 23 A. Yes.  
 24 Q. So it's around about the time that they're thinking  
 25 about putting Mr Khan out on an in-person hearing, but

1 this is not about him. What you have got is you've got  
 2 an email comes in to you from someone who says that they  
 3 have been on a course with another student -- sorry,  
 4 they are reporting something that another student has  
 5 said, a concern, that if you look:  
 6 "She told me that one of the students from  
 7 Whitemoor, whose name neither of us can remember..."  
 8 Then there is a redacted section:  
 9 "... took out a poem that he had been writing  
 10 independently to show to her and another Whitemoor  
 11 student at their table. The first stanza of the poem,  
 12 which my friend read before he hid it away, having been  
 13 told by the other Whitemoor student that it was  
 14 'disgusting' and to 'put it away' appeared to be a first  
 15 person account of someone watching children in  
 16 a playground with the intention of raping them."  
 17 Now, you will remember this because it's very heavy?  
 18 A. Yes.  
 19 Q. If we then look above this at {DC6384/151}, please, to  
 20 see how you deal with this, firstly at the bottom half  
 21 of that page, as I understand it, and tell me if  
 22 I don't, you say:  
 23 "Would be great to discuss this [and I think this is  
 24 with Ruth] when you have a minute. Have arranged a call  
 25 with the student first things tomorrow. Haven't shared

1 with anyone else yet. Just looked a participant list  
 2 and suspect this is ..."  
 3 Because at this stage you don't know who the  
 4 prisoner is:  
 5 "... matches this description ... Gina [which is Gina  
 6 Butler] stressed to the max and is taking the rest of  
 7 this week off. Have needed to grant her a week  
 8 extension for her MSt essay..."  
 9 And that's partly why I asked you about your  
 10 involvement with Gina Butler: you do seem to be involved  
 11 in supervising or giving her an extension?  
 12 A. So as director of the course I would review and approve  
 13 routinely requests for extensions.  
 14 Q. But Gina can't discuss this with you and as I understand  
 15 it you weren't able to talk about it with Steve Machin  
 16 yet, but at {DC6384/154} you write your response, and  
 17 what you say there is this:  
 18 "I explained that I will need to share the content  
 19 of your email with our colleague, Steve..."  
 20 So you have not done it yet:  
 21 "... in security. I will do this in person, so that  
 22 Steve and I can talk it through. As I mentioned,  
 23 I suspect that the person who shared this poem did so,  
 24 in part, because he is processing his own sexual abuse  
 25 trauma, in other part because of sadness and anxiety

1 that the course (which is one of the only educational  
 2 activities in which he has engaged positively) is ending  
 3 and therefore perhaps self-sabotaging because he is more  
 4 used to exclusion and failure than success..."  
 5 Et cetera.  
 6 Now, you are writing this email -- I know this is  
 7 sensitive stuff, I want to be careful about it -- you  
 8 are writing this email in order to reassure a student on  
 9 one of the courses that she is okay and, in fact, if we  
 10 go further down, that she's okay to come back to the  
 11 course.  
 12 Now, you interpret what that man is doing when you  
 13 don't know who that man is at the moment, you may  
 14 suspect, but you don't know, you haven't spoken to  
 15 Steve Machin yet and you haven't spoken to Gina Butler  
 16 yet. How are you able to come to the view that this is  
 17 all okay because it's part of his own sexual abuse  
 18 trauma and he's a bit sad at the end of the course?  
 19 A. So reading on in that paragraph I can see that it says:  
 20 "None of this is to condone what your friend has  
 21 experienced but I hope it provides some hopeful and  
 22 reassuring context."  
 23 So what I am clearly not doing is condoning that  
 24 behaviour. What I'm trying to do, because the context  
 25 of that email, I think, is that the friend is very

1 worried about breaching the trust of her other friend ,  
 2 and I feel very pleased that our processes seem to be  
 3 working, that she's reaching out and sharing this ,  
 4 I think that's the first important thing to acknowledge,  
 5 and then I am passing on this information. So I have  
 6 made the assessment that there's no immediate threat to  
 7 her safety .  
 8 Q. I understand that.  
 9 A. I then have liaised closely with the tutors at the  
 10 college to provide welfare support and then I've sent  
 11 this very carefully drafted email following discussion  
 12 with Ruth.  
 13 Q. I see that, and I'm going to be clear about why I am  
 14 putting this to you. I am worried about blurred lines,  
 15 blurred boundaries, and you stepping into areas where  
 16 you should not be. You are not in a position to know  
 17 whether this man is risk or not risk because of his own  
 18 sexual abuse trauma or whether this is about sadness at  
 19 a course ending, but you say that to a student in  
 20 a sensitive context. What does this tell us about your  
 21 personal approach to risk and your alignment with  
 22 prisoners?  
 23 A. I think it shows us that I escalate it appropriately to  
 24 the people who can take the decision about his safe,  
 25 continued participation . I think it shows that I am

1 very alive and sensitive to the challenges, and  
 2 I'm very -- I take a very careful approach to supporting  
 3 students to navigate some very difficult issues .  
 4 Q. All right . One last thing . We know that Mr Khan was  
 5 escorted on June -- now, this is an easy  
 6 issue -- June 2019 he goes to Whitemoor with two police  
 7 officers . He's going to a high security environment and  
 8 he's still given two police officers by  
 9 Staffordshire Police . We know that Mr Gallant, on  
 10 29 November, despite being a category D prisoner by this  
 11 point, is also escorted to the Learning Together event  
 12 by Adam Roberts; yes?  
 13 A. Yes. It was his first ROTL after 14 years of a prison  
 14 sentence, whereas Usman Khan is, of course, free in the  
 15 community, but yes.  
 16 Q. Yes. So it is absolutely possible to have escorts to  
 17 your events. You're very happy to have prisoners there?  
 18 A. Yes.  
 19 Q. Can I just have, this is my final point, {DC6695/131}  
 20 up, please. I hope this is the right reference.  
 21 I think this may be below that section. If I need to  
 22 check this, I will . The point is, you would have been  
 23 perfectly happy to have these officers in there, and  
 24 what this email tells us, in fact, if I've got the right  
 25 email --

1 A. It's the bottom paragraph of that email.  
 2 Q. It's the bottom paragraph of that email, where you  
 3 say: absolutely perfectly fine to have two officers in,  
 4 and indeed in Fishmongers' Hall as Adam Roberts was?  
 5 A. Yes, we would have added him to the list.  
 6 MR ARMSTRONG: No difficult with that.  
 7 Thank you very much, Dr Ludlow, I have no further  
 8 questions.  
 9 A. Thank you.  
 10 JUDGE LUCRAFT: I'm just going to check if there are any  
 11 others. Ms Whitelaw, do you want to come forward?  
 12 Questions by MS WHITELAW  
 13 MS WHITELAW: My name is Francesca Whitelaw and I ask  
 14 questions on behalf of HMPPS.  
 15 A. Thank you.  
 16 Q. I only have a few questions for you, please.  
 17 First of all, yesterday, earlier in your evidence  
 18 you were asked some questions by Mr Hough about risk  
 19 assessment when Learning Together operates in  
 20 HMP Whitemoor, which, as we know, is a high security  
 21 category A prison, and you confirmed in your answers to  
 22 Mr Hough that there would be prison guards in  
 23 attendance, emergency alarms, and staff had radios?  
 24 A. Yes.  
 25 Q. It may be obvious to you, but in order to get anywhere

1 in the prison, you have to get through locked doors and  
 2 gates; is that right?  
 3 A. Many, many times.  
 4 Q. And there's CCTV all over the prison?  
 5 A. There is.  
 6 Q. And are you also aware of searching procedures so that  
 7 prisoners are searched, for example, coming off the  
 8 wings?  
 9 A. Yes, and also at the entrance to our learning centre  
 10 well .  
 11 Q. And are you also aware through your work that a whole  
 12 range of educational and meaningful activities take  
 13 place in HMP Whitemoor every day?  
 14 A. Very much so.  
 15 Q. We're going to hear more evidence about that.  
 16 For now, then, when the prison assessed the risk of  
 17 a prisoner attending the Learning Together course at  
 18 Whitemoor, the context of that risk is an educational  
 19 activity within a high security setting?  
 20 A. Yes, it is .  
 21 Q. Secondly, you were asked yesterday, also by Mr Hough,  
 22 about whether you had known about negative intelligence  
 23 concerning Usman Khan. As you're not a member of  
 24 Whitemoor's prison staff and certainly not the security  
 25 and intelligence departments, would you expect that you

1 wouldn't be told of prison intelligence unless perhaps  
 2 there was a specific credible risk against you or --  
 3 A. Absolutely.  
 4 Q. Were you aware of a change in Usman Khan's behaviour  
 5 over the time he was in prison?  
 6 A. No. If anything, in an upward direction, I would say.  
 7 Q. Well, I was going to ask you next: you were asked about  
 8 negative intelligence, but were you aware of positive  
 9 reports about Usman Khan?  
 10 A. I was aware that he was doing well with a library group.  
 11 I was peripherally aware of his work with the Sycamore  
 12 Tree course. Every feedback that I had informally from  
 13 all colleagues at Whitemoor, and residents, was  
 14 positive.  
 15 Q. And is it your experience working with offenders that  
 16 their behaviour can change over their time in prison,  
 17 including within high security prisons?  
 18 A. It can.  
 19 Q. And is that one of the purposes of education, to try and  
 20 encourage that?  
 21 A. It is.  
 22 Q. A third area I wanted to ask you about. You have  
 23 indicated in your evidence obviously it's a prison's  
 24 role to assess risk while Usman Khan was in prison, and  
 25 I think you were also aware that MAPPA took over risk

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1 management of Usman Khan on his release from prison?  
 2 A. I am, indeed. Jo Boulton connected us with Kenneth for  
 3 that purpose.  
 4 Q. We have heard a lot about all of those people, but  
 5 perhaps not breaking it down slowly, so MAPPA, as  
 6 Mr Hough mentioned, you understand it to stand for the  
 7 Multi-Agency Public Protection Arrangements?  
 8 A. Yes.  
 9 Q. And in broad terms, it's a process through which  
 10 agencies such as probation, the police, prisons and  
 11 other bodies work together to gather and share  
 12 information and combine expertise and resources; is that  
 13 right?  
 14 A. That's right.  
 15 Q. And that's to manage risk?  
 16 A. That's my understanding.  
 17 Q. And you mentioned Jo Boulton, who was the offender  
 18 supervisor for Usman Khan when he was in prison?  
 19 A. Yes.  
 20 Q. And Kenneth Skelton was the offender manager who was the  
 21 probation offender manager for Usman Khan when he was  
 22 released from prison?  
 23 A. Yes.  
 24 Q. And am I right that as an education provider, the  
 25 contact you had with MAPPA would be through

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1 Kenneth Skelton?  
 2 A. That's right.  
 3 Q. Were you aware that Kenneth Skelton took part in the  
 4 MAPPA process?  
 5 A. I was.  
 6 Q. Fourthly, over the 11 months between Usman Khan's  
 7 release from prison in December 2018 and November 2019,  
 8 did you personally, or were you aware of anyone at  
 9 Learning Together at any time having cause for concern  
 10 about his risk to the public?  
 11 A. No, and had I had those concerns, I knew exactly where  
 12 to escalate them and would have done so.  
 13 Q. That was my next question: what would you have done if  
 14 you had?  
 15 A. I would have escalated them immediately to Kenneth, if  
 16 not to the police, if that was required.  
 17 Q. Thank you. And finally, it was suggested to you by  
 18 Mr Armstrong that on 23 December 2018, Usman Khan was  
 19 a category A prisoner, and on 24 December he was, in  
 20 Mr Armstrong's words, free. I just wanted to ask you,  
 21 were you aware that he was subject to an electronic tag?  
 22 A. I was.  
 23 Q. Were you aware that he was subject to onerous licence  
 24 conditions?  
 25 A. I wasn't aware of the detail, but my assumption had

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1 been, given the nature of his offence and his MAPPA  
 2 supervision, that he would be.  
 3 Q. Were you aware that he was required to reside at  
 4 an approved premises on release?  
 5 A. I was aware of that.  
 6 Q. Were you aware that he was subject to a curfew?  
 7 A. Yes, I think I was.  
 8 MS WHITELAW: Thank you, those are all my questions.  
 9 A. Thank you.  
 10 JUDGE LUCRAFT: Thank you, Ms Whitelaw.  
 11 We have one further advocate. We will just clean  
 12 the space again.  
 13 Questions by MR MORLEY  
 14 MR MORLEY: Thank you, sir. My name is Stephen Morley and  
 15 I am counsel for the City of London Corporation.  
 16 Good morning, members of the jury.  
 17 Good morning, Dr Ludlow, I just have four short  
 18 topics to ask you, please. The City of London  
 19 Corporation has an interest in these proceedings because  
 20 of its role and responsibility with regards to licensed  
 21 premises and health and safety in the City of London.  
 22 The first topic I want to ask you about, please, is  
 23 the previous alumni event that you told us about in  
 24 2018 --  
 25 A. Yes.

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1 Q. -- that you had organised. You didn't give us any  
 2 detail about that, and I wondered whether I could just  
 3 ask you, in a sentence or two, to tell us where that was  
 4 and what the arrangements were in comparison to the  
 5 Fishmongers' Hall event?  
 6 A. It was held within Cambridge, within  
 7 University of Cambridge facilities, and the arrangements  
 8 I would describe as broadly analogous to the  
 9 arrangements for this event: it had a technology focus,  
 10 so a slightly different substantive focus, it wasn't  
 11 a five-year celebration, obviously, but broadly  
 12 comparable.  
 13 Q. Thank you. A similar number of attendees?  
 14 A. I think fewer, is my memory.  
 15 Q. No -- I think you said earlier on, no TACT offenders  
 16 going, no convicted terrorists?  
 17 A. No, but other students with other convictions.  
 18 Q. Thank you. The event at Fishmongers' Hall, was that the  
 19 first event of this kind that you had organised in the  
 20 City of London?  
 21 A. No, we've held other academic conferences within  
 22 Leeds -- London South Bank University, for example,  
 23 we've held an event at HMP Brixton. So there have been  
 24 a few London-based events.  
 25 Q. The location of Fishmongers' Hall at the end of

1 London Bridge, was that of any significance to you in  
 2 organising this particular event?  
 3 A. No. Its significance as a venue was because of previous  
 4 support from Fishmongers' Hall, and because it was  
 5 a central London location that was fairly accessible  
 6 through public transport. I think those were the main  
 7 factors.  
 8 Q. No significance so far as London Bridge is concerned?  
 9 A. No.  
 10 Q. The second topic, please, is just a couple of questions  
 11 about information that you provided to  
 12 Fishmongers' Hall.  
 13 A. Yes.  
 14 Q. You have told the jury that a guest list was sent; would  
 15 that be, effectively, just a list of names?  
 16 A. I think it might have had organisations, I can't  
 17 remember, but yes.  
 18 Q. Yes. And that would help them, for example, or help you  
 19 with the production of name tags and things like that.  
 20 A. Yes.  
 21 Q. But it didn't identify ex-offenders or offences or  
 22 anything like that?  
 23 A. No.  
 24 Q. Did you tell anyone at Fishmongers' Hall that  
 25 a convicted terrorist was attending?

1 A. I didn't tell them, they didn't ask, and I had  
 2 understood that it was understood by them because of the  
 3 nature of what we do that people with criminal  
 4 convictions would be there, but I didn't tell them  
 5 specifically that someone with a TACT offence was there.  
 6 Q. Thank you.  
 7 Third topic, please, is in relation to information  
 8 given to others.  
 9 A. Yes.  
 10 Q. And you've told us about Mr Skelton in particular, you  
 11 have been telling us all about MAPPA, but the  
 12 information, for example, a guest list and who was  
 13 attending this event, was it sent to others, for  
 14 example, other probation teams dealing with other  
 15 ex-offenders, those sorts of things?  
 16 A. Yes, so certainly in relation to -- one of the guests  
 17 was also on ROTL, so anybody who is attending on release  
 18 from temporary licence from a prison we would engage  
 19 more closely with the inside decision-maker and share  
 20 information, and then in respect of others who were  
 21 under community supervision, we would have provided that  
 22 to probation officers as it was requested and needed.  
 23 Q. And, again, that was perhaps a list of names, answers to  
 24 questions, but you weren't drawing anybody's attention  
 25 to Khan?

1 A. No.  
 2 Q. What about other people attending the event? So I've  
 3 asked you about providing information to other  
 4 organisations; what about other people attending, other  
 5 attendees; were they given a list of other attendees,  
 6 a guest list?  
 7 A. No, I wouldn't routinely share names of a guest list.  
 8 Sometimes it's a bit sensitive, it feels like it's sort  
 9 of personal information to share. They were all aware  
 10 of the sorts of people who would be attending from our  
 11 invitation, so they were aware that other supporters  
 12 were attending, they were aware of some of our students  
 13 attending, so they knew the broad categories but not the  
 14 individuals.  
 15 Q. Yes. So as Mr Armstrong was suggesting to you, broad  
 16 categories of ex-offenders, ex-prisoners, would have  
 17 been known, for example, to Fishmongers' Hall and to  
 18 other people attending, but you didn't draw anybody's  
 19 attention to the fact that Khan, a convicted terrorist,  
 20 was attending?  
 21 A. No, that's right.  
 22 Q. For example, other attendees may have had their own  
 23 views about whether or not they wanted to attend the  
 24 event if they had that knowledge. Was that  
 25 a consideration?

1 A. That wasn't a consideration. I think I understood that  
 2 everybody who was there knew that people had criminal  
 3 convictions there, and I had — I make the assumption  
 4 that broadly you're happy to be there knowing that  
 5 somebody is convicted of a criminal offence and not  
 6 seeking to differentiate between types of offence.

7 Q. All right.  
 8 The last topic, please, is just in relation to your  
 9 evidence about relying upon HMPPS to conduct risk  
 10 assessments in particular in relation to this event.  
 11 I think you said to Mr Hough, it may have been to  
 12 Mr Pitchers, that there was nothing in writing, there  
 13 was no policy or document that dealt with your reliance  
 14 upon HMPPS, but was it something that was discussed with  
 15 them? Did they know that you were relying upon them to  
 16 conduct risk assessments?

17 A. Yes, most definitely, it's how we — it's implicit in  
 18 our application process and how we run that process.  
 19 We referred, I was referred yesterday to the  
 20 safeguarding policy, and at the time of the incident  
 21 that was sitting with our HMPPS colleagues in Whitemoor  
 22 for their input, and they had read a description of how  
 23 we divide responsibilities, so I have full confidence  
 24 that they would understand their responsibilities for  
 25 risk assessment.

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1 MR MORLEY: Dr Ludlow, thank you very much, that's all  
 2 I have. Thank you.  
 3 Thank you, sir.

4 JUDGE LUCRAFT: Thank you. Mr Griffin, you have sat  
 5 patiently in the front but, again, please, if you would  
 6 just introduce yourself and your role.

7 Questions by MR GRIFFIN

8 MR GRIFFIN: Thank you very much, sir. I am  
 9 Nicholas Griffin and I am representing Cambridge  
 10 University.

11 JUDGE LUCRAFT: Thank you.

12 MR GRIFFIN: I just want to cover a few areas with you, but  
 13 I'm not going to be very long.  
 14 You have been asked by Mr Hough about an essay that  
 15 Usman Khan wrote concerning radicalisation, and I just  
 16 want to look at one document with you, please, that may  
 17 explain how it came to be in your possession. Can we  
 18 go, please, to {DC6694/84}.

19 Can we have the whole document on the screen to  
 20 start, please. So can we see that this is a letter to  
 21 you and to Dr Armstrong from Usman?

22 A. Yes.

23 Q. And at the bottom can we see that he has written it from  
 24 the approved premises, and so after he has left prison?

25 A. Yes.

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1 Q. Can you please, now, expand the top half?  
 2 So this is what he has written, starting in the  
 3 second paragraph:  
 4 "... I'm sending the report I wrote while in  
 5 Woodhill. It's just in draft form and needs further  
 6 improvements, ie referencing and etc. I hope I could  
 7 get your feedback and help in improving it and making it  
 8 presentable.  
 9 "As I said the report was written without any  
 10 material, so it's purely from my own thoughts and  
 11 understanding of radicalisation and extremism.  
 12 I concluded this after reading books, reports, articles  
 13 and material you had sent me and what I read elsewhere.  
 14 It also is from my own and other's personal experiences.  
 15 On the long run I hope to get it publish[ed]..."  
 16 Was this the letter accompanying the essay when it  
 17 was provided to you by Usman Khan?

18 A. Yes.

19 Q. And so we can see that the essay itself was written  
 20 whilst he was in Woodhill?

21 A. That's right.

22 Q. And that he had plans to finish it and possibly to  
 23 publish it?

24 A. That's right.

25 Q. Can we move now to one of the Learning Together events

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1 that Mr Hough asked you about, which is the digital  
 2 innovations event at Whitemoor prison. You discussed  
 3 this with Mr Hough yesterday and explained that  
 4 Usman Khan had been invited to it.

5 A. He had.

6 Q. And you talked, in brief, about arrangements with  
 7 Usman Khan's probation officer, Mr Skelton, and the fact  
 8 that he looped in the police?

9 A. Yes.

10 Q. And that the application for him to attend was approved,  
 11 and that he had been escorted there by  
 12 Staffordshire Police.

13 A. That's right.

14 Q. Can we just look at a couple of documents concerning the  
 15 preparation for that event in respect of Usman Khan.  
 16 {DC6695/63}. Bottom half, please, the bottom email.  
 17 Can you just get the top of that email.

18 JUDGE LUCRAFT: It's at the top of the very bottom.

19 MR GRIFFIN: Sorry, what I mean is that there's an email  
 20 that is about a third of the way down the page.  
 21 I wasn't clear. There we go.  
 22 Can we see an email from Ken Skelton in fact to  
 23 Ruth Armstrong on 9 May?

24 A. Yes.

25 Q. And in the body of the email:

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1 "Could you please send me all the details regarding  
 2 timings and other relevant details for Usman's day at  
 3 the prison on the 12th of June, we have arranged for him  
 4 to be transported so we need timings so that all the  
 5 relevant preparations can be made in advance."  
 6 So that's an email from the probation officer to  
 7 your colleague.  
 8 A. Yes.  
 9 Q. Can we now go to {DC6695/61}. The top of the page to  
 10 start, please. Can we see now an email from you to  
 11 Ken Skelton, the probation officer, and we've heard  
 12 Calum Forsyth's name before, but who was he?  
 13 A. A police officer, I think he was a Prevent officer from  
 14 Staffordshire Police.  
 15 Q. And was he involved in the supervision of Usman Khan?  
 16 A. Yes. Yes.  
 17 Q. So this is 9 May, again. Can we now just see the body  
 18 of the email. It is you to both of those individuals:  
 19 "Lovely to be in touch with you both and many thanks  
 20 for your ongoing work..."  
 21 Then to the next paragraph:  
 22 "Please see attached for our 'agenda' for the day.  
 23 External visitors will need to arrive to the gate at  
 24 Whitemoor..."  
 25 And so on, and then can we see that you are posing

1 questions to both the probation officer and the police  
 2 officer:  
 3 "Ken --- will you travel with Usman?  
 4 "Calum --- are you joining us for the event?"  
 5 A. Yes.  
 6 Q. And then you talk about putting an invitation in the  
 7 post to Usman Khan.  
 8 {DC6695/74}, please. Thank you. Could you just  
 9 expand the email that we see about a quarter of the way  
 10 down the page, and in fact would you mind getting the  
 11 details about who it is being sent to, just a little bit  
 12 higher up. Thank you.  
 13 So can we see that this is 13 May, an email from  
 14 you, again to Ken Skelton and Calum Forsyth?  
 15 A. Yes.  
 16 Q. And we can now see also, copying in Stephen Machin?  
 17 A. Yes.  
 18 Q. "Dear Kenneth and Calum  
 19 "This email is to connect you with our colleague in  
 20 Security at Whitemoor, Steve Machin. I've just  
 21 discussed with Steve about Usman joining us for the  
 22 digital roundtable on 12 June. Steve is kindly going to  
 23 continue discussions with colleagues and will provide  
 24 wise counsel in terms of the selection of other ...  
 25 students..."

1 And then can we see questions towards the bottom of  
 2 the email to Kenneth Skelton:  
 3 "I have explained that the MAPPA team have signed  
 4 off on Usman's attendance... do you need anything  
 5 further from us?"  
 6 And to Calum Forsyth, the police officer:  
 7 "I have introduced you to Steve as the police  
 8 officer who is arranging for Usman's transport..."  
 9 And so on.  
 10 So is this the kind of contact you would be having  
 11 with probation, police and prison authorities in advance  
 12 of an event of this type?  
 13 A. In advance of every event, yes.  
 14 Q. Now, one more point that was raised with you, with  
 15 Mr Hough, was contact with the Timpson Foundation in  
 16 relation to possible employment for Usman Khan?  
 17 A. Yes.  
 18 Q. And in response to that, or in the context of that, you  
 19 spoke about an email from Ken Skelton, and I just want  
 20 to take you to that, please. So this is {DC5635/20}.  
 21 That's perfect, thank you very much.  
 22 So can we see that this is an email that has come on  
 23 28 November, we see that in the top left-hand corner,  
 24 from Ken Skelton, and it starts:  
 25 "Good morning to you both.

1 "I apologise for the late reply.  
 2 "Amy as you are aware..."  
 3 So that's a reference to you?  
 4 A. Yes.  
 5 Q. "Bernadette", now is Bernadette --- we don't need to use  
 6 her full name --- but is she a representative of the Alex  
 7 Timpson Trust and Foundation and is she a support  
 8 manager there?  
 9 A. Yes.  
 10 Q. And so she is someone that you had been in contact with?  
 11 A. Yes.  
 12 Q. "Amy as you are aware, Bernadette I have been  
 13 supervising Usman since 2014/15 and have noticed  
 14 a marked difference in his behaviour attitude and future  
 15 outlook since 2016 which coincides with his engagement  
 16 with Learning Together. He prior to release completed  
 17 all work around his offending behaviour and gained  
 18 positive post programme reports. Since his release  
 19 Usman spent a period in an approved premises, engaged  
 20 well with staff and other agencies involved with him.  
 21 He complied fully with all restrictions placed upon his  
 22 and he continues to do so with commitment and  
 23 enthusiasm. He has a very good relationship with myself  
 24 and other agencies responsible for his management."  
 25 And can we see just a bit further on in that

1 paragraph:  
 2 "He has and continues to present as self-motivated  
 3 to secure employment and applied for numerous posts but  
 4 due to the nature of his offence has immediately been  
 5 discounted, which I feel is a loss to the organisation  
 6 as he would prove a good worker and a positive addition  
 7 to any organisation if they were able to offer him  
 8 an opportunity."  
 9 Then just in the next paragraph:  
 10 "Mr Khan has undergone a comprehensive risk  
 11 assessment and myself and other agencies feel it  
 12 appropriate for him to undertake this type of employment  
 13 if offered and would expect him to make a positive  
 14 impact. He is a good communicator and engages well with  
 15 others."  
 16 So is this the kind of reference in relation to  
 17 Usman Khan that you were getting from probation,  
 18 including shortly before the event at Fishmongers' Hall?  
 19 A. Yes, it reflects every indication that we had.  
 20 Q. Finally, I just want to ask you a little bit more about  
 21 contact with The Fishmongers' Company. You have covered  
 22 this already so I'm not going to cover the same ground.  
 23 I just want to look at one document with you.  
 24 Can we please go to -- in fact two documents  
 25 {DC6696/75}. This is a very short email, maybe I'll

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1 just read this out and hope that my extra reference  
 2 works. So what I wanted to put up was an email from you  
 3 to Amy Spolton. Who was Amy Spolton?  
 4 A. She was the grants manager at Fishmongers'.  
 5 Q. On 2 October, and in the email you say that:  
 6 "Following up on our short conversation, please see  
 7 updated application attached with links to the Whitemoor  
 8 report."  
 9 I wanted to look at the application with you. So  
 10 this is {DC6696/76}.  
 11 JUDGE LUCRAFT: Just whilst we're waiting for that, just  
 12 remind me of the date of the email that we didn't see.  
 13 MR GRIFFIN: The date of the email was 2 October 2019.  
 14 If there is an issue with this, I have  
 15 an application form in front of me.  
 16 JUDGE LUCRAFT: Yes.  
 17 MR GRIFFIN: I could start just by reading a few entries,  
 18 and if the form could be found that would be great, but  
 19 I would like to progress.  
 20 MR HOUGH: I think the operator can actually speak to us.  
 21 Could the operator indicate whether this will be coming  
 22 in the next 30-60 seconds?  
 23 EPE OPERATOR: My apologies, but there has been an issue but  
 24 I'm trying to sort it out now.  
 25 JUDGE LUCRAFT: An issue with this document or an issue

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1 generally?  
 2 EPE OPERATOR: An issue generally.  
 3 JUDGE LUCRAFT: Right.  
 4 MR GRIFFIN: So may I proceed. If it's not a helpful way of  
 5 proceeding, I will stop and we can wait for the form,  
 6 but it may be that the points that I want to draw from  
 7 this are quite concise and it is possible to proceed in  
 8 this way.  
 9 JUDGE LUCRAFT: Yes. My only hesitation, Mr Griffin, is  
 10 that you've got the document in front you, the witness  
 11 doesn't, nor does -- the lawyers will, but the jury  
 12 won't, and I'm anxious that if there's a point that we  
 13 need to follow, it's rather better that we have the  
 14 document.  
 15 The only suggestion I was going to make is that  
 16 we've got other witnesses from Learning Together, if  
 17 it's in fact a point which could be made by putting the  
 18 question to the witness who is to follow, that's my only  
 19 question of you.  
 20 MR GRIFFIN: In fact, this is an application that Dr Ludlow  
 21 was responsible for.  
 22 JUDGE LUCRAFT: Yes.  
 23 MR GRIFFIN: So she is the appropriate witness.  
 24 But maybe the thing to do, I don't have anything  
 25 else after this form other than to ask Dr Ludlow whether

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1 she has any further points that she would like to make.  
 2 So it may be that I can ask her if she wants to do  
 3 that and then come back to this form if necessary.  
 4 JUDGE LUCRAFT: Yes.  
 5 MR GRIFFIN: Did you understand? So we may come back to one  
 6 document.  
 7 A. That's fine.  
 8 Q. But I just wanted to give you the opportunity if there  
 9 was anything further you wanted to say before you  
 10 conclude your evidence?  
 11 A. Yes, thank you.  
 12 I didn't want to leave giving evidence without  
 13 saying something to Jack and Saskia's families, but also  
 14 the families of Izzy and Steph and Lukasz who were  
 15 injured, and condolences doesn't really cut it.  
 16 Heartbreak, profound sadness and grief, deep sadness  
 17 at the abhorrent violence and devastation of this  
 18 tragedy. I want to say that I adored Saskia and Jack.  
 19 In my witness statement I said the world has been robbed  
 20 of some of its most compassionate, courageous and  
 21 brilliant people. I loved them. I was so proud of  
 22 them. I have no doubt that they would have continued to  
 23 make remarkable positive contributions to the world.  
 24 And the other thing I wanted to do was acknowledge  
 25 that many people's lives, my own included, were saved,

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1 or sought to be saved, on 29 November by people with  
 2 criminal convictions. The best of us, as the Prime  
 3 Minister put it, can and does include people with  
 4 criminal convictions, and I want to say thank you to  
 5 them, and thank you to everyone: the police officers,  
 6 the paramedics, my colleagues at Fishmongers' Hall, my  
 7 colleagues in criminal justice who do difficult work in  
 8 the most challenging of circumstances, and my colleagues  
 9 in Learning Together for all that they did. Their  
 10 bravery that day was astonishing, and I want to put on  
 11 record that I'm so grateful for it.

12 MR GRIFFIN: Just before I sit down, I will just check if  
 13 that form is available; otherwise I will put it to  
 14 a different witness.

15 JUDGE LUCRAFT: I'm just going to check, because I know  
 16 somebody...

17 MR GRIFFIN: Sir, I will do as you suggested, I will ask  
 18 someone else about that.

19 JUDGE LUCRAFT: Thank you.

20 MR HOUGH: Dr Ludlow, I have nothing more for you. Thank  
 21 you very much for your evidence.

22 A. Thank you.

23 JUDGE LUCRAFT: Thank you very much.

24 Mr Hough, I'm conscious we weren't going to take  
 25 a break, but if we've got a technical glitch that may

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1 force one upon us but shall we see how we get on?

2 MR HOUGH: I think at least the first part of my examination  
 3 of Dr Armstrong may not need much in the way of  
 4 documents, so we will see how we go.

5 JUDGE LUCRAFT: That's rather what I thought, so we'll carry  
 6 on for the moment.

7 DR RUTH ARMSTRONG (sworn)

8 JUDGE LUCRAFT: Dr Armstrong, either sit or stand, whichever  
 9 you would feel most comfortable doing.

10 A. Thank you.

11 JUDGE LUCRAFT: There's a microphone, as you see, at either  
 12 place. I notice you've got a file on the desk with you.  
 13 I'm going to ask you not to refer to that unless  
 14 Mr Hough or somebody asks you to.

15 A. It's only, sir, just because it has the witness  
 16 statements, so if I could open it at the witness  
 17 statements, that might be helpful.

18 JUDGE LUCRAFT: Thank you. As I say, either sit or stand,  
 19 whichever you would feel most comfortable doing.

20 A. Thank you.

21 Questions by MR HOUGH QC

22 MR HOUGH: Would you please give your full name for the  
 23 court record.

24 A. Dr Ruth Armstrong.

25 Q. Dr Armstrong, you understand that I'm asking you

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1 questions first on behalf of the Coroner and then you  
 2 will have some questions from other lawyers.

3 You made a substantial witness statement to the  
 4 police on 17 December 2019, and then another statement  
 5 through the University of Cambridge in January of this  
 6 year, and we may refer to those as we go.

7 Are you, along with Dr Ludlow, from whom we've just  
 8 heard, one of the co-founders of Learning Together?

9 A. I am.

10 Q. What is your post as an academic?

11 A. In October 2017 I became a senior research associate.  
 12 Prior to that, I was a part-time research associate.

13 Q. So a senior research associate in the  
 14 Institute of Criminology?

15 A. Correct.

16 Q. And that's a department within the Faculty of Law at the  
 17 University of Cambridge?

18 A. It is.

19 Q. That's the post you held in November 2019, is it?

20 A. It is.

21 Q. Now, we've covered a lot of ground with your colleague,  
 22 Dr Ludlow, and I'll try not to repeat her evidence  
 23 through you, but inevitably there will be a little  
 24 overlap.

25 Do you, like Dr Ludlow, have extensive academic and

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1 research experience in relation to prisons, penal  
 2 policy, and offenders?

3 A. I do.

4 Q. Like Dr Ludlow, are you CTC cleared and authorised to  
 5 move unescorted around prisons?

6 A. I am.

7 Q. Does that clearance and authorisation involve you having  
 8 had any training in risk assessment of prisoners or  
 9 security matters in prisons beyond physical security as  
 10 you move around?

11 A. I've not had risk assessment training in prisons, but  
 12 I have undertaken the security training that's relevant  
 13 to carry keys. I have undertaken Prevent training  
 14 within prisons, I've undertaken TCAT, which is the  
 15 therapeutic community training, and there is one more  
 16 training, just the general security training, which is  
 17 to do with things like corruption, that my colleague  
 18 mentioned.

19 Q. Is it right that you have a particular academic interest  
 20 in trust in the penal context?

21 A. My academic interest is in movements away from crime,  
 22 desistance and how people move away from crime. I do  
 23 teach and have published around the role of trust within  
 24 that.

25 Q. So you have a particular interest in desistance. Is

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1 that strategies for moving offenders away from  
 2 offending?  
 3 A. It's the understanding of the processes through which  
 4 people move away from crime.  
 5 Q. Do you or have you ever had training, research  
 6 experience or other experience in extremism and  
 7 radicalisation, specifically in the context of Islamist  
 8 extremism?  
 9 A. No.  
 10 Q. Have you had training in the Prevent programme, which is  
 11 part of the government's counter-terrorism strategy?  
 12 A. Yes.  
 13 Q. In a sentence or two, what did that training cover?  
 14 A. That training covered the — how you identify people who  
 15 might be at risk of radicalisation, and what you need to  
 16 do about it in terms of your Prevent duty, statutory  
 17 duties.  
 18 Q. When you say people who might be at risk of  
 19 radicalisation, is that people who might be at risk of  
 20 radicalising others, or being radicalised?  
 21 A. Both.  
 22 Q. May we move on to your founding and development of  
 23 Learning Together. We've heard that you founded  
 24 Learning Together with Dr Ludlow initially as a teaching  
 25 and research project at the University of Cambridge; is

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1 that right?  
 2 A. Correct.  
 3 Q. And that it began as a project in conjunction with one  
 4 prison, HMP Grendon, after which it was developed to  
 5 projects at Warren Hill and Whitemoor?  
 6 A. It was always conceived as a multi-site project, so it  
 7 was funded initially by the University of Cambridge and  
 8 then under the British Academy research fund and it was  
 9 also a multi-site project.  
 10 Q. We've heard this from Dr Ludlow in her words, but in  
 11 your words, again in a sentence or two, what is the idea  
 12 behind or mission statement of Learning Together?  
 13 A. Learning Together is an educational organisation that  
 14 seeks to provide access to higher education in ways  
 15 that's standardly available to people, including people  
 16 who live and work within our criminal justice system.  
 17 Q. We've also heard through Dr Ludlow that  
 18 Learning Together has developed so that there is now  
 19 a network involving a number of universities operating  
 20 similar projects, and that your team has a role in  
 21 providing guidance and toolkit documents and so on to  
 22 those other universities?  
 23 A. We work with other people who deliver other prison and  
 24 university partnerships. We collect documents together  
 25 and together, we have, yes, compiled a toolkit under the

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1 HMPPS grant.  
 2 Q. And is it right that following that grant, and as part  
 3 of the work of the network, Learning Together  
 4 established two corporate entities, Learning Together  
 5 Network CIC, and Cambridge Justice Limited?  
 6 A. Correct.  
 7 Q. Is it also right that those entities had not been put to  
 8 very much substantive use before the attack?  
 9 A. The limited company is entirely dormant, it's never been  
 10 used; the CIC had a very limited use and was not in any  
 11 way related to the work that we were carrying out.  
 12 Q. Thank you. We heard from Dr Ludlow that the division of  
 13 responsibility between you and her in Learning Together  
 14 is that you are focused more on the research side of the  
 15 project, and she tends to take the lead in prison  
 16 education courses; is that a fair summary?  
 17 A. That's correct.  
 18 Q. She has also told us about the team of staff who work  
 19 for Learning Together, typically employed by the  
 20 University of Cambridge.  
 21 A. All of them are employed by the University of Cambridge,  
 22 including myself and Dr Ludlow.  
 23 Q. In a nutshell, what has been the nature of your research  
 24 within the Learning Together project?  
 25 A. We seek to understand — so there's lots of good

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1 research evidence that education is correlated with —  
 2 and when I say correlated with, what I mean is  
 3 associated with, people who take part in education,  
 4 including higher education, are more likely to move away  
 5 from crime, less likely to cause future harm.  
 6 What we do in Learning Together is to try to  
 7 understand some of the mechanisms through which that  
 8 happens, so we are wanting to understand when and how  
 9 those things might take place.  
 10 Q. Has your research involved considering the efficacy of  
 11 programmes like Learning Together, or Learning Together  
 12 itself in moving people away from crime?  
 13 A. At this point it has not. We had just applied for  
 14 a research grant, which unfortunately was decided the  
 15 week after the tragic incident that has brought us here,  
 16 and that project was in partnership with the Department  
 17 for Education and with the Ministry of Justice, and it  
 18 was to look at outcomes.  
 19 So by now, five years in, we have enough  
 20 participants. You need, in order to do an outcome  
 21 study, a certain number, a certain sample number of  
 22 students, so we had enough students who had taken part  
 23 to be able to do a comparison with people who had not  
 24 taken part who are similar to our students so that we  
 25 could look at outcomes. So we were interested in those

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1 outcomes but we hadn't yet done that piece of work.  
 2 Q. I'm going to ask you briefly about a couple of your  
 3 academic writings to consider your approach to dealing  
 4 with ex-prisoners, and I hope I'll do so in a way which  
 5 will be fair to the articles, without going through them  
 6 absolutely fully.  
 7 Is it right that in January 2014 you published  
 8 a chapter entitled "Ethics to Real World Research:  
 9 Supervising Ethical Reflexivity when taking Risks in  
 10 Research with 'The Risky'."  
 11 A. Correct.  
 12 Q. We can put that on screen I think now {DC6577/1}.  
 13 Now, in that chapter, did you recognise that  
 14 research with recently released prisoners was often  
 15 accompanied with safeguards?  
 16 A. Can I just say that this is a draft of that chapter, so  
 17 this relates to work from 2006/2007, so that's 15 years  
 18 ago, and this is not the published version of that  
 19 chapter. So I'm not sure how this is... but this is  
 20 a draft.  
 21 Q. Let me ask you whether you agree with this proposition.  
 22 A. Mm-hm.  
 23 Q. In the chapter, both as drafted and I think as  
 24 published, did you recognise that research with recently  
 25 released prisoners was often accompanied by safeguards

1 for the researchers, physical and other?  
 2 A. Yes, it's probably helpful to provide some context to  
 3 this chapter. So this relates to my fieldwork, which is  
 4 in the United States of America, so the safeguards that  
 5 I'm discussing are not the safeguards that relate to  
 6 Learning Together, because that's in the UK. These are  
 7 to do with the safeguards that were in the United States  
 8 of America, and it's to do with safeguards that are  
 9 relevant to ethnographic research. So ethnographic  
 10 research, for the benefit of the jury, is like  
 11 anthropological research, it comes from, it is like when  
 12 people go, maybe to other cultures, and spend time  
 13 living with other people, so it's a particular kind of  
 14 research. That's not the kind of research we were doing  
 15 in Learning Together.  
 16 So yes, it does have things about safeguards in it,  
 17 but the safeguards are relating particularly to the  
 18 American context, and to ethnographic living alongside  
 19 kind of research.  
 20 Q. Thank you.  
 21 Did you recognise in this article, or comment in  
 22 this article, that safeguards, including physical  
 23 safeguards for researchers, could sometimes undermine  
 24 the quality of research?  
 25 A. I think my main aim here was to do with -- in this

1 article was to do with how safeguards, so regulatory  
 2 frameworks, might sometimes not encourage honesty and  
 3 transparency, but instead lead to deception. So there's  
 4 similar work done by Onora O'Neill about financial  
 5 markets where she talks about how they are regulated and  
 6 how it is really important to think about regulations,  
 7 so that they encourage people to be honest about  
 8 challenges and difficulties they face, and I think  
 9 that's what this article is doing.  
 10 Q. Do you consider that safeguards for researchers dealing  
 11 with recently released prisoners, including physical  
 12 safeguards, can affect the trust of the relationship and  
 13 undermine quality of research?  
 14 A. Sorry, can you repeat the question so I can be sure  
 15 I have understood it?  
 16 Q. Do you consider that in research with recently released  
 17 prisoners, safeguards, including physical safeguards for  
 18 researchers, can damage the trust of the relationship  
 19 and undermine the quality of research?  
 20 A. I think that safeguards are vitally important. I think  
 21 that safeguards need to be negotiated in real world  
 22 research, which is what I'm saying here, and I think  
 23 that they should be negotiated transparently in order  
 24 that you don't damage trusting relationships, because  
 25 trust is very important that you place it well, that you

1 don't misplace trust or misplace mistrust, because they  
 2 can have difficult consequences. So I think my answer  
 3 is that safeguards are recognised, and I think I  
 4 recognise here that safeguards and transparency are  
 5 vitally important to safety.  
 6 Q. Developing that point, may we look at the summary at the  
 7 head of another article you published. {DC6578/2},  
 8 please. This is the published copy of an article  
 9 entitled "Trusting the Untrustworthy", from the journal  
 10 "Studies in Christian Ethics", and the abstract states:  
 11 "This article analyses the nature of trust ... in  
 12 mentoring ex-prisoners. Literature outlines  
 13 understandings of well-placed trust as dependent upon  
 14 the motivations of the trust parties, placed in those  
 15 who are perceived to be trustworthy or placed in those  
 16 who have the potential to be trust-responsive. This  
 17 article [and it's focusing on faith-based volunteer  
 18 mentors] describes how faith-based volunteer mentors'  
 19 motivations to serve God rather than save man  
 20 facilitated their bestowal of unearned trust on their  
 21 ex-prisoner protégés and how this gift of trust was  
 22 capable of potentiating a trustworthy response. It also  
 23 describes how this proactive trust was well-placed in  
 24 some who failed to be trustworthy because it encouraged  
 25 open and honest communication of this failure. As

1 a result, it [which I think is the article] argues in  
 2 some circumstances it could be intelligent to place  
 3 trust proactively without evidence of trustworthiness,  
 4 and that trust of this kind could be especially  
 5 important to people released from prison.”  
 6 Now, that’s the abstract at the head of the article,  
 7 no doubt a short summary of an article which  
 8 I acknowledge is detailed and complex. But is it fair  
 9 to say that one theme of this article is that effective  
 10 mentoring can benefit from placing trust without  
 11 evidence of trustworthiness?  
 12 A. I think it’s important to contextualise that. What this  
 13 article is not talking about is placing trust in people  
 14 who are untrustworthy. What it is talking about is that  
 15 there is a gap between misplaced trust, which would be  
 16 trusting someone who is untrustworthy, and misplaced  
 17 mistrust, which would be not trusting somebody who is  
 18 trustworthy, and in the middle of that section what you  
 19 have is a lack of evidence of trust. What this article  
 20 highlights is that often people who have criminal  
 21 convictions are treated as categorically untrustworthy.  
 22 So an example that might be helpful to the jury is  
 23 that if I trust my 2-year-old to cross the road, that  
 24 would be misplaced trust. If I don’t trust my  
 25 12-year-old to cross the road, that would be misplaced

1 mistrust. All of the evidence around trust suggests  
 2 that both of those things are likely to have bad  
 3 consequences.  
 4 So this article is about how you place trust well,  
 5 and saying that sometimes you might want to think about  
 6 in that middle section where you don’t yet have evidence  
 7 of trust, placing trust, and it does so because it draws  
 8 on the work of several authors, but one of them is  
 9 Philip Pettit, and what he shows through his research is  
 10 that when you place trust in people, they are likely to  
 11 be trust-responsive, so that if you want people to be  
 12 trustworthy, placing trust in that middle section, not  
 13 with people who are untrustworthy and you have evidence  
 14 of that, not not placing trust in people who there is  
 15 evidence they’re trustworthy, but when you are in that  
 16 middle section, if you place trust, it might be well  
 17 placed.  
 18 Q. Thank you. As part of Learning Together do you follow  
 19 that through and consider it important to place  
 20 proactive trust in people for whom there is not evidence  
 21 of either trustworthiness or untrustworthiness?  
 22 A. Within Learning Together we follow all of the safeguards  
 23 that are available to us to the letter, which I think  
 24 has been shown.  
 25 What I would say about this paper is that it is also

1 based on evidence from the 2006/2007 fieldwork, so it’s  
 2 also about ethnography. The Learning Together  
 3 environment is a very different environment, it’s not  
 4 an everyday interaction environment: it’s an educational  
 5 context environment.  
 6 But I do lecture senior probation officers, so  
 7 within my role at the University of Cambridge, I don’t  
 8 just run Learning Together, I teach undergraduates,  
 9 I teach masters students and I teach senior prison  
 10 officials and senior probation officers, and I lecture  
 11 them on trust and offender management, and when I do so  
 12 yes, we talk about within the bounds of what people do  
 13 in their role, how it is that you might place trust, and  
 14 there is good evidence that that can be helpful to  
 15 people moving away from crime, having appropriate areas  
 16 of trust.  
 17 Q. Thank you. May we now move to Usman Khan and his  
 18 joining Learning Together.  
 19 Now, we’ve heard from Dr Ludlow about his  
 20 application to Learning Together in November 2017 and  
 21 the various courses he did in Whitemoor after that.  
 22 I’m not going to ask you about all of that. But I would  
 23 like to ask you about this: what was your understanding  
 24 of what steps were taken by Prison Service employees to  
 25 clear inmates to participate in Learning Together

1 classes?  
 2 A. My understanding is that applications went out to people  
 3 and they would fill out those applications, they would  
 4 be gathered in by the head of learning and skills, they  
 5 would then be sifted by the security department, by the  
 6 OMU department with relevant input from psychology and  
 7 any other programmes, education maybe, for a lack of  
 8 conflicts, and then once there was an agreement that  
 9 there was a group of people who were safe to  
 10 participate, that’s not just participate in terms of  
 11 their own individual risk factors but also in concert  
 12 with all of the other people who were being cleared to  
 13 participate, only then would we consider the  
 14 applications. We would then interview those people and  
 15 then we would select from that group, so that we were  
 16 only ever engaging in an interview with someone who we  
 17 had been told could participate in the course.  
 18 Q. Now, you’ve told us the process and you’ve also told us  
 19 that the litmus test in the security checking was  
 20 safety, both as individuals and as individuals mixing  
 21 with the other people on the course so that you didn’t  
 22 have difficult relationships, but beyond simply knowing  
 23 that the Prison Service was assessing these individuals  
 24 for safety, were you aware of any criteria, thresholds  
 25 or standards that were being applied by the Prison

1 Service in making the security check?  
 2 A. No.  
 3 Q. Were you aware whether or not anyone was being excluded  
 4 on the basis of offence type?  
 5 A. No.  
 6 Q. You thought they weren't being or you just didn't know?  
 7 A. I would assume that they were not, because I would  
 8 assume that within the prison that we're working, people  
 9 would be -- people who applied would be looked at by  
 10 security relating to their individual risk, but that  
 11 would be up to the security department.  
 12 Q. So you didn't know whether people were being excluded  
 13 based on offence type, but it would have surprised you  
 14 if you had been told that they were?  
 15 A. Yes.  
 16 Q. Were you aware whether any criteria or threshold was  
 17 being applied based upon the person's conduct in prison?  
 18 A. I didn't have that specific discussion, but, again, it  
 19 wouldn't have surprised me if that was something that  
 20 people looked at.  
 21 Actually, that's not entirely true, because there  
 22 was one person who I know was excluded on the basis of  
 23 escape risk, so that was fed back to that student, and  
 24 then they were told they needed to do certain things,  
 25 which they did over the next year, and then they applied

1 successfully the year after once that risk had reduced.  
 2 So in that sense that was communicated.  
 3 Q. Were you then told sometimes that people had been  
 4 prevented from joining your course on security grounds?  
 5 A. Yes.  
 6 Q. Were you ever told why?  
 7 A. I tended not to deal with that side of the work.  
 8 Dr Ludlow did.  
 9 Q. I'll ask you this: would it have concerned you to know  
 10 that somebody participating in your course had been  
 11 convicted of a very serious terrorism offence?  
 12 A. It would -- let me be clear that I find very serious  
 13 terrorism offences very difficult to deal with, as  
 14 I find every kind of serious offence very difficult to  
 15 deal with, so certainly it concerns me, but absolutely  
 16 I would be relying on my colleagues in HMPPS to be doing  
 17 the risk assessments so that -- people who commit  
 18 serious offences we know actually move away from crime  
 19 in the same ways as other people. We also know they're  
 20 much less likely to re-offend, so 1% of people released  
 21 by the Parole Board re-offend, 4-7% of people convicted  
 22 of serious offences. So what I would be expecting is  
 23 that the security department are looking at people who  
 24 can take part in our courses based on the fact they  
 25 think at that moment in time they are safe to do so.

1 Q. Would you have been concerned to know that somebody  
 2 cleared to participate in your course had, during their  
 3 time in prison, been the subject of many reports  
 4 associating them with radicalisation and bullying on the  
 5 wing?  
 6 A. I think it's quite common for people to have very  
 7 difficult prison histories, and to decide at a moment  
 8 when they reach rock bottom that they want to move and  
 9 decide to do life differently, so I wouldn't have been  
 10 surprised that people who have been judged safe have  
 11 previous histories of very difficult behaviour, no.  
 12 Q. Moving on from previous histories, would it concern you  
 13 to know that somebody participating in your course was  
 14 the subject of prison intelligence from recent months  
 15 linking them to radicalisation and bullying?  
 16 A. I would have expected that any concerns that any of the  
 17 people who were managing that risk had that they felt  
 18 were relevant to the Learning Together environment would  
 19 have been communicated. So if they had not been  
 20 communicated with me, I would be assuming we could carry  
 21 on, that they felt that those risks were not relevant.  
 22 Q. Suppose that you had been told by someone like  
 23 Steve Machin: we have somebody who is going to be on  
 24 your course, he's a TACT offender, and he's been linked  
 25 over the course of his time in prison to radicalisation

1 and bullying. We've still got some reports of that sort  
 2 of thing going on about him at the moment, but don't  
 3 worry, we think he's safe to attend. What would your  
 4 reaction have been?  
 5 A. I would definitely question why they would think that  
 6 was safe to attend. I want to be very clear that had we  
 7 had -- we had absolutely no indication of any  
 8 concerns --  
 9 Q. So if you were told --  
 10 A. -- regarding Usman Khan, and if we had, we of course  
 11 would have made different decisions.  
 12 Q. Of course, yes. Are you okay to go on?  
 13 A. Yes.  
 14 Q. Dr Armstrong, you'll understand what I'm trying to get  
 15 at is how Learning Together would have responded if they  
 16 had been told certain things, and that then the Prison  
 17 Service people will be asked about why information  
 18 wasn't passed to you?  
 19 A. Correct.  
 20 Q. If you were told that there were this information now,  
 21 would you be disappointed that you hadn't been told it  
 22 at the time?  
 23 A. I would expect, and it's clearly communicated, that any  
 24 risks relevant to the Learning Together environment  
 25 would have been shared with us, if they were appropriate

1 to be shared with us. Actually my expectation is just  
 2 that a decision would have been made to remove him,  
 3 because sometimes it might not be appropriate to tell  
 4 an educator what the risk is, but certainly we have had  
 5 examples of students who have been removed from the  
 6 classroom for security reasons, so I would have expected  
 7 that that would have happened. If they needed to  
 8 communicate it with us in order to keep us safe, that's  
 9 what I would have expected, but that's for the  
 10 professional judgment of security colleagues.  
 11 Q. Thank you.  
 12 Can I move on to the period after Usman Khan was  
 13 released from prison, which we know was at the end  
 14 of December 2018. Now, we know that he was on licence,  
 15 subject to numerous licence conditions, that he had to  
 16 live in approved premises, not travel outside Stafford,  
 17 have regular contact with probation officers and police.  
 18 Were you aware in general terms of those  
 19 restrictions on his life?  
 20 A. I was aware that Usman was supervised by MAPPA, which  
 21 tells me that he has been released as someone that is  
 22 considered to be high risk. I was aware that he had  
 23 some licence conditions, but I wasn't aware of the  
 24 details of them. I was aware of the internet, because  
 25 that related to educational activity, and aware that he

1 didn't have a smartphone, but I was not aware of the  
 2 detail of his licence conditions, no.  
 3 Q. Is it right that you and other members of the  
 4 Learning Together team maintained some contact with both  
 5 Usman Khan directly and with his probation officer?  
 6 A. Correct.  
 7 Q. If we can put on screen, please, {DC6695/13}. Can we  
 8 see here that on 2 January 2019 you emailed Mr Skelton,  
 9 the probation officer, noting that Usman had been  
 10 released and providing contact details to enable Usman  
 11 to be put in contact with you?  
 12 A. Correct.  
 13 Q. Then page 14, please {DC6695/14}, do we see that on  
 14 11 January 2019, you emailed Mr Skelton with details of  
 15 Learning Together events, identifying in particular in  
 16 the second main paragraph, one on 12 March 2019, the  
 17 Madingley Hall event in Cambridge?  
 18 A. Yes, so I say there it's a Madingley Hall event in  
 19 Cambridge, the vice chancellor of the university would  
 20 be attending, what it's for, and that we would be  
 21 delighted to welcome both Kenneth and Usman to that  
 22 event, and what we are looking for is Usman to share his  
 23 experiences in relation to Learning Together.  
 24 Q. Yes. And then {DC6695/18}, please. Can we see that  
 25 Mr Skelton raised a series of questions which you

1 answered in different coloured typescript?  
 2 A. Yes.  
 3 Q. And down towards the bottom of the page, can we see that  
 4 in the last paragraph on the page you said you hoped  
 5 that Usman would give a five-minute speech about his  
 6 experiences of Learning Together?  
 7 A. Yes.  
 8 Q. And page 19, please {DC6695/19}. In answer to  
 9 a question about whether you knew of Usman's offences,  
 10 you say that you are aware to the extent that the  
 11 information is in the public domain, but not aware of  
 12 specific risk factors and happy either to be told or not  
 13 told those.  
 14 A. Yes, what I'm communicating there is that we are aware  
 15 that is convicted of a TACT conviction, but we are  
 16 unaware of his specific risk factors and that we would  
 17 need to know them to the extent they are relevant to  
 18 Learning Together activities, and that it's  
 19 transparently shared with him that that's being told to  
 20 us, which was our standard practice, to try to have  
 21 transparent meetings with probation officers and with  
 22 people post-release so that there was information  
 23 sharing between everybody.  
 24 Q. Do you think on reflection that it was important for you  
 25 to know if there were any risk factors if you were

1 inviting him to an event with students and the vice  
 2 chancellor and so on?  
 3 A. I don't just think it on reflection; I think I thought  
 4 it at the time. I think looking at this email now  
 5 I would want to state it much more clearly and much more  
 6 specifically, but I think it's very clear what  
 7 I'm saying, and actually what I would like to say is  
 8 that this reflects standard practice. So another of the  
 9 things that I have done for many years is been  
 10 an advisor on community-led initiatives, which works  
 11 with lots of people mentoring people post-release, and  
 12 so a lot of their mentors are university students, and  
 13 what I know from their practices in the ways that they  
 14 liaise with probation is that probation officers will  
 15 not routinely tell mentors what offences people have  
 16 been convicted of. But what they do share is specific  
 17 risk factors that are relevant to the activity that's  
 18 being undertaken, and they mentor people up to MAPPA  
 19 level 3. So the same level that Usman was being  
 20 supervised at.  
 21 So that's what I'm referring to in that email, is  
 22 that standard practice for probation of relevant  
 23 information sharing with third sectors in order to  
 24 safely carry out your activities.  
 25 Q. What that was in the public domain did you know of

1 Usman's offences?  
 2 A. I knew that Usman was convicted of a TACT offence, and  
 3 I think that is probably all I knew at that stage.  
 4 Q. So you hadn't done a Google search and found out about  
 5 the specifics of the offence?  
 6 A. I do not rely on Google to find out specifics of  
 7 offending. So if you have — if I'm going to do  
 8 a research interview with a burglar and I rely looking  
 9 at Google to see if there's even any information about  
 10 that person and don't relate to their probation officer,  
 11 what I might not know is that that person also has risks  
 12 to women, and that would be very important for me to  
 13 know. So it's important that we communicate to  
 14 probation what activities are, and that they communicate  
 15 to us any risks that are relevant to those activities.  
 16 Q. I'm not suggesting a superficial approach. You refer to  
 17 knowledge in the public domain.  
 18 A. Mm—hm.  
 19 Q. A simple search in relation to Usman Khan would have  
 20 brought up, for example, the sentencing remarks of  
 21 Mr Justice Wilkie, which were not superficial or  
 22 limited. You hadn't obtained anything like that?  
 23 A. I hadn't, and I wasn't aware that Justice Wilkie, who  
 24 was a previous colleague of mine, had been his  
 25 sentencing judge. I shall now look at those comments.

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1 Q. Following these exchanges, did it turn out that  
 2 Usman Khan's attendance at the Cambridge event wasn't  
 3 permitted?  
 4 A. It did.  
 5 Q. Were arrangements then made for you, Ms Ghiggini and  
 6 Mr Larmour to travel to Stafford on 5 March and film  
 7 a short clip with Usman Khan?  
 8 A. It was.  
 9 Q. If we look at {DC6695/34} of this file, do we see that  
 10 at the bottom of the page that Usman was going to be  
 11 providing a draft of what he was to say, which was going  
 12 to be a three to five—minute speech, and following on  
 13 from that email did Mr Skelton ask for a copy of any  
 14 film of that speech?  
 15 A. Yes. So it's probably helpful to provide some context  
 16 to this email, which is that this email followed  
 17 a conversation with Kenneth on the telephone, and  
 18 Kenneth — and in fact probation officers in general —  
 19 often work on the telephone rather than by email. And  
 20 Mr Skelton, I had a discussion with him. So the  
 21 discussion originally was that he would do the filming  
 22 and film it and he would then send us the film via  
 23 WeTransfer. He didn't like the technological parts of  
 24 that arrangement, so he asked could we go and film it —  
 25 well, he asked me to call him, so I did call him, and in

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1 that telephone conversation we discussed the fact that  
 2 I didn't have budget to come up to do this film. Then  
 3 we discussed the fact that it could be a research  
 4 interview, and if we had a research interview that there  
 5 would be budget, an allocated budget from which we could  
 6 cover the costs of that visit.  
 7 So we had that conversation, and he then asked me,  
 8 he said that he didn't have any concerns about the  
 9 research interview in terms of risks, but that there  
 10 would be concerns around the film. So he asked me to  
 11 draft this email to him on the back of that call that  
 12 outlined the matters in relation to the film, so that  
 13 this email could be forwarded to MAPPA. What you'll see  
 14 is that I suggest that we would be having an hour and  
 15 a half with Usman. Obviously we would not have needed  
 16 an hour and a half to film a five—minute speech. So  
 17 that's the context to that email.  
 18 Q. So just to be clear about your evidence, you are clear  
 19 that you told Mr Skelton that there would be a research  
 20 interview on this occasion as well?  
 21 A. Correct.  
 22 Q. Did you tell him that that research interview would be  
 23 recorded?  
 24 A. I don't know if I would have mentioned that it would be  
 25 recorded. I said — I told him what the research was

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1 about, which was to do with people's experiences of life  
 2 post—release, so context, and especially their  
 3 experiences of Learning Together with reference to life  
 4 post—release.  
 5 I think it would be assumed, just to say that  
 6 criminal justice colleagues are fairly used to research,  
 7 so it would not be a surprise to him, I think, that it  
 8 would be a recorded interview. But I don't know that  
 9 I mentioned it.  
 10 Q. Did Mr Skelton ask for a copy of any recording or notes  
 11 of that interview?  
 12 A. No. So he would understand there is an HMPPS process of  
 13 clearance for research, which we have gone through  
 14 meticulously for all of our research projects, and  
 15 within those authorisations to conduct research, the  
 16 confidentiality of research interviews is clearly  
 17 agreed. So no, Mr Skelton never made any request for  
 18 that interview.  
 19 Q. Did you volunteer to provide him with any recording or  
 20 notes of that interview given that he had also wanted  
 21 a copy of the short video clip?  
 22 A. No. I think the copy of the short video related to the  
 23 fact that it was going to be shown publicly and that  
 24 there was concern that there wasn't anything  
 25 offence—focused within that, obviously because of the

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1 Prevent Duty; and the same concerns did not apply to the  
 2 research interview, which is anonymous, confidential and  
 3 not shared.

4 Q. Did you consider that if there was anything in the  
 5 research interview indicative of Usman Khan's mindset,  
 6 that it might be helpful once you had finished it to  
 7 send it to his probation officer to help him in his  
 8 task?

9 A. The only reason I would have shared a research interview  
 10 would be for reasons that are agreed in the British  
 11 criminological standards, society standards, which are  
 12 any risks of harm to self, risks of harm to other. Any  
 13 indication of offences that are admitted to that have  
 14 not -- you've not been found guilty of, and within  
 15 prisons also risks to prison security. There were none  
 16 of those concerns so I would not have shared that, which  
 17 is not to say that I didn't have a follow-up call with  
 18 Kenneth Skelton, which I did following this, and we did  
 19 discuss in general terms Usman's well-being. So I was  
 20 able to feed back to him how I thought he was, which  
 21 related to some of the content of our discussion, but  
 22 I did not know -- share any specifics because it would  
 23 have been unethical of me in terms of the ethics  
 24 standards that regulate my profession.

25 Q. We'll come back to what you said to Mr Skelton

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1 afterwards, but it's right to say that you went to  
 2 Stafford on 5 March 2019, and met with Usman Khan at his  
 3 approved premises?

4 A. Correct.

5 Q. While there, did you film the short clip and conduct  
 6 an interview which you recorded?

7 A. Yes.

8 Q. May we please --

9 A. We recorded the interview on a voice recorder, just to  
 10 say, so the film --

11 Q. Yes.

12 A. -- it's a different recording.

13 Q. May we please show on screen the clip of Usman Khan  
 14 speaking about Learning Together, which was filmed that  
 15 day. I hope this will be {AV0001}, and we will hope the  
 16 technology works.

17 (Video played)

18 I'm sorry, can we stop. Stop. This should be  
 19 a video recording and at the moment we don't have the  
 20 image. If we can get the image on screen and go to the  
 21 beginning of it.

22 If we can go to the beginning and play from the  
 23 beginning, please.

24 (Video played)

25 Now, just one question before we break,

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1 Dr Armstrong, and I appreciate how hard that must have  
 2 been to watch. Right at the start of the video  
 3 Usman Khan said that he had spent most of his prison  
 4 time in segregation and that his level of segregation,  
 5 his amount of time in segregation, was unheard of in the  
 6 United Kingdom. Did you know at the time that those  
 7 were lies?

8 A. I didn't know at the time. We filmed that video before  
 9 we did the research interview. In the research  
 10 interview he talked a lot about his time in segregation,  
 11 and that's when I became aware of the amount of time  
 12 that he spent there. I'm aware of lots of other people  
 13 who have done lots of work in high security prisons have  
 14 spent a lot of time -- I think of someone in particular  
 15 that I think won a case because of the amount of time  
 16 they had spent in segregation, so I would have been  
 17 aware from the content of the video that that would not  
 18 have been true, because I know of people who have spent  
 19 a lot of time in segregation.

20 MR HOUGH: Thank you very much.

21 Sir, would that be a convenient time for our break?

22 JUDGE LUCRAFT: It will. We will pause there and, Mr Hough,  
 23 we will pick up at 2 o'clock. Thank you very much,  
 24 ladies and gentlemen.

25 (In the absence of the jury)

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1 MR HOUGH: Sir, just to be clear, for Dr Armstrong's  
 2 benefit, although she obviously knows about the rules  
 3 around not discussing her evidence over lunch, that  
 4 doesn't prevent her in any way from speaking to friends  
 5 and colleagues more generally and taking their comfort.

6 A. Thank you.

7 JUDGE LUCRAFT: I'll rise.  
 8 (12.57 pm)

9 (The short adjournment)

10 (2.03 pm)

11 JUDGE LUCRAFT: Mr Hough.

12 MR HOUGH: Dr Armstrong, before lunch we had been speaking  
 13 about your visit to Stafford on 5 March, and we had seen  
 14 the video of Usman Khan which was filmed to be played at  
 15 the Madingley Hall event.

16 That was followed, I think you said, by the research  
 17 interview, which was voice-recorded?

18 A. Correct.

19 Q. May we have a quick look at some parts of the transcript  
 20 of that interview so the jury can see a flavour of it  
 21 {DC6690/1}, please, and if we may go to page 3 towards  
 22 the bottom of the page {DC6690/3}. I'm just going to  
 23 take a few excerpts so that the jury get a feel before  
 24 we ask some questions.

25 The question is:

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1 "Does it matter if it is in some ways not purposeful  
 2 in terms of thinking coming off high risk or getting  
 3 out? Does it matter?"  
 4 And this is asking about the high risk category  
 5 which Usman Khan was concerned he remained on until  
 6 release. And the answer he gives is:  
 7 "Yes, it matters because I am not high risk no more.  
 8 I might be whatever, but this is the thing. It matters  
 9 in the sense of — look, I can be myself. In Woodhill,  
 10 at the time I didn't even have my... you know when you  
 11 arrive there, you don't have nothing. This goes to  
 12 security there. I thought, let me put pen to paper and  
 13 I wrote that little ... that was me just writing, just  
 14 ideas. That is why it matters. I can sit there and  
 15 write something. If I need a reference, yes. I have  
 16 got some references from this year I can use. I think  
 17 the progression ... in prison, prisoners want to  
 18 progress. People might call them opportunities to  
 19 whatever. It is difficult. They want to get to a B cat  
 20 or a C cat to meet their families. That is what it is  
 21 about. Most prisoners, I don't care ... obviously I am  
 22 talking about long term prisoners. They have got  
 23 families, they are family men. Okay, they might have  
 24 done things unjustifiable or whatever, but they are  
 25 family people, they are family orientated, they are

1 older. That is why I feel sad, because I have seen that  
 2 side of it. There is a Muslim family day. Normally  
 3 I am in the high risk group so I don't get to see it but  
 4 I went to the room and wow, all these families there.  
 5 That's when it becomes emotional."  
 6 Then if we can look at another answer, {DC6690/7} at  
 7 the bottom of the page. There's a question about MAPPA:  
 8 "How do you engage with all the MAPPA people because  
 9 you have got fairly tight restrictions post-release? Do  
 10 you think it has made a difference, being able to  
 11 interact with staff inside to how you are interacting  
 12 with people outside?"  
 13 Answer:  
 14 "I think it has made a big difference. This is what  
 15 it is. They are reading a piece of paper about my  
 16 prison history. When you read it, obviously you know my  
 17 conviction where you have to deal with the police to do  
 18 with terrorism and stuff like that, but what I am  
 19 realising in the process is that there has been new  
 20 legislation, that a lot has changed. If I came out  
 21 10 years ago, it would have been a pretty different  
 22 story. Now it is pretty much... I appreciated it more  
 23 even though it has happened to myself. I appreciate why  
 24 there may be a need to have that response there, but  
 25 then there is ... the people I communicate with are my

1 probation officer and the police officers. I can just  
 2 be how I am to them and it is for them to go across to  
 3 the MAPPA and to say why his restrictions need to be...  
 4 obviously there has to be basic supervision, then it has  
 5 to be looked at on an individual basis. I reacted  
 6 better because of that reaction, what I have had before  
 7 because in prison ... imagine the police officers said  
 8 'I don't care' or the guy is looking and going 'it makes  
 9 no difference to me, mate'. I actually like it that you  
 10 won't come here because I don't want to be around them  
 11 when I am on the outside, mate. That is the reality,  
 12 but before I would have been like, what's that person  
 13 thinking? It happens. Having that communication in  
 14 prison, I think ... a lot of people come from  
 15 a particular background. That is the only people they  
 16 have ever chatted to."  
 17 And so on. And then down, please, to {DC6690/12},  
 18 again towards the bottom:  
 19 "What about since you got out? Who has been your  
 20 friends since you got out?"  
 21 Answer:  
 22 "That is what it is. I haven't got no friends. You  
 23 guys are my friends. The truth of the matter is I have  
 24 got a family. I have got a big family I am coming from.  
 25 It is a sad fact, but the need of friendship, it has

1 gone beyond that. I will talk to anyone, anybody who  
 2 give me the time, but emotionally I have got my family  
 3 there."  
 4 Then over the page {DC6690/13}. Question:  
 5 "I am just wondering — who would you go to for  
 6 support if you had a problem tomorrow?"  
 7 "This is what I am saying. I have got many people  
 8 to go to. That is the thing ... if I had financial  
 9 support — I can go to my family. Say I am talking  
 10 about housing. I am waiting for you guys. Once you  
 11 give me the clear, I will get a house. Business-wise,  
 12 my family are business owners. Some of them are  
 13 millionaires. Emotionally I have got ... imagine for  
 14 those eight years, I never used to communicate with my  
 15 family. From the age of 16 I have lived on my own. 14,  
 16 15 I kind of lived on my own, done my own thing. Prison  
 17 gave me the opportunity to make the relationship with my  
 18 family. I never spoke to them. Now I speak to every  
 19 day one of them."  
 20 Then he goes on to talk a little more about his  
 21 family.  
 22 We can take that off screen now. I have given those  
 23 examples, it's obviously a long interview, but is it  
 24 fair from those examples to say that this interview  
 25 involved some long, often rambling monologues?

1 A. Yes, that's correct.  
 2 Q. That A number of times Usman Khan settles on grievances  
 3 from prison life , often without being particularly  
 4 pointed to them?  
 5 A. Yes.  
 6 Q. And it also shows a particular concern about the level  
 7 of supervision he had, both in prison and outside.  
 8 A. I don't know that he mentioned the level of supervision.  
 9 He mentioned difficult --- in my memory, he mentioned  
 10 difficult relationships within the prison. He talked  
 11 about them getting much better towards leaving the  
 12 prison. He talked about engaging with security  
 13 departments in new ways, and how that put him at risk  
 14 within the prison from people he was moving away from,  
 15 and I think he talked then about good relationships with  
 16 the police and probation post-release. That's my  
 17 memory.  
 18 Q. But in the extract that we looked at about MAPPA ---  
 19 A. Mm-hm.  
 20 Q. --- you remember the question and answer about MAPPA.  
 21 A. Mm-hm.  
 22 Q. As I understand it, and you can tell me if I'm wrong  
 23 because you were there, his answer was suggesting that  
 24 under legislation which had come in over the previous  
 25 10 years, supervision was tighter than it would have

1 been previously?  
 2 A. I understood that the other way round, actually, but  
 3 I don't know --- you could be right in your  
 4 interpretation , but my understanding is that he was  
 5 saying: I'm now able to be managed individually, and so  
 6 if I'm doing things different --- so I understand that  
 7 the other way.  
 8 Q. Having got to the end of that interview, and again, you  
 9 were there hearing him rather than looking at  
 10 necessarily extracts, what did you think of his mental  
 11 state and how settled he seemed?  
 12 A. The interview felt to me fairly standard for somebody  
 13 who had been released from closed conditions straight to  
 14 the street. He was definitely --- it was --- the  
 15 interview wasn't in any way about his time in prison, it  
 16 was meant to be about what life was like now. It was  
 17 very difficult to pull him into those questions, he kept  
 18 going back to the prison, so that's one thing I would  
 19 notice.  
 20 He was very hopeful, so he had --- one of the things  
 21 I remember thinking during the interview is that in  
 22 research on desistance there is something called tragic  
 23 optimism, and Shadd Maruna writes about it, and that was  
 24 correlated with --- so people who had this tragic  
 25 optimism were more likely to do better post-release from

1 prison than people who didn't in his research in terms  
 2 of moving away from crime.  
 3 So there was a lot of --- despite very difficult  
 4 circumstances, he was evidently lonely , what I heard  
 5 from the interview was that he had hope, he had  
 6 optimism.  
 7 Q. Were you troubled at all by his comment that he hadn't  
 8 any friends and that you, from Learning Together, who  
 9 were seeing him only very occasionally , were his only  
 10 real friends?  
 11 A. That's very standard for people who get out of crime.  
 12 The work of Marguerite Schinkel establishes that when  
 13 people move away from crime they often move away from  
 14 delinquent peers and that often leaves them very lonely  
 15 and isolated, so it felt standard, and I think yes it is  
 16 a concern that we in general in Learning Together  
 17 understand.  
 18 Q. Before lunch you told us that during the course of this  
 19 interview you realised that some of the things that he  
 20 was saying about having been in segregation for a high  
 21 proportion of his time in prison weren't true?  
 22 A. So I don't think at the time, I have to say, that  
 23 I didn't think about that. You saying to me now that he  
 24 had claimed that; I didn't remember that claim, I didn't  
 25 recognise it at the time, but I do recognise now that

1 that claim would not be true.  
 2 Q. Okay. As somebody who works in the criminal justice  
 3 system ---  
 4 A. I work in a university .  
 5 Q. Yes, but in a role which takes you into the criminal  
 6 justice system with your CTC clearance and so on, do you  
 7 know how common it is for somebody genuinely to spend  
 8 the majority of their sentence in segregation, as he  
 9 claimed?  
 10 A. No.  
 11 Q. You have no idea?  
 12 A. No.  
 13 Q. Well, we may hear a little more about this, but what  
 14 would you say if it was suggested that it was almost  
 15 unheard of for somebody to spend the majority of their  
 16 sentence in segregation? True segregation?  
 17 A. I would not think that was true.  
 18 Q. How did you come to know that Usman Khan's claim to have  
 19 spend the majority of his time in segregation was  
 20 untrue?  
 21 A. Only because --- I've never thought about that, because  
 22 you just asked me it now and I thought no, I know of  
 23 people who have --- who have spent a long time, so having  
 24 just thought about it now. I have to say I did not  
 25 think about it at the time.

- 1 Q. Before, or at the time that you recorded this interview,  
2 in the immediate aftermath, did you have any view on  
3 whether Usman was telling the truth when he made those  
4 claims about his time in prison?
- 5 A. It feels an odd thing to say in these environments, but  
6 when you're doing a narrative interview, you're not  
7 concerned with whether someone is telling the truth or  
8 not. It's not a truth-finding interview. What you're  
9 doing is understanding how someone is narrating their  
10 life, because you're going to analyse that alongside 200  
11 other interviews and certain themes will be extracted,  
12 and how -- so, for example, in the tragic optimism  
13 example I gave you, what was found that from a large  
14 sample of people giving interviews, people who had  
15 places where they're talking about tragic optimism, when  
16 you then split those people aside and say who  
17 reoffended, who desisted and moved away from crime, you  
18 would find that theme much more prevalent in the  
19 interview of the people who moved away from crime, so  
20 I wasn't listening to the interview thinking is it true  
21 or not.
- 22 Q. When you were taking the video, were you concerned about  
23 the accuracy of what he was saying in a video that would  
24 be played publicly at a Learning Together event?
- 25 A. It was played in a private event, so that was one of the

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- 1 conditions with probation, and there were a very select  
2 number of people there, and I had no reason to think  
3 that the things he was saying about his experience of  
4 Learning Together were not true.
- 5 Q. We'll move on to events after the March 2019 visit. Is  
6 it right that you had text communications with him,  
7 including from April 2019, about both general matters  
8 and also about job opportunities?
- 9 A. It is.
- 10 Q. We can look at some of those. {DC6694/18} so we can  
11 see, for example, a text to you. First of all ...
- 12 JUDGE LUCRAFT: I think before we all rush to an opticians,  
13 Mr Hough, we should explain that it's fuzzy on the  
14 screen. It's not that you have special powers to read  
15 something which many of us might otherwise struggle  
16 with.
- 17 MR HOUGH: First of all, is this a set of texts that came  
18 after the March 2019 interview?
- 19 A. I don't know.
- 20 Q. If we can go a previous page please and we may see a  
21 date. And previous {DC6694/16}, and previous  
22 {DC6694/15}. So we see that these are messages  
23 from April 2019?
- 24 A. If that relates to all of the thread, then that would be  
25 correct.

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- 1 Q. I think it does. If we go down to {DC6694/18} again.  
2 Can we see that there's an exchange about a job  
3 interview in which Usman Khan is talking about the need  
4 to stay optimistic?
- 5 A. Yes.
- 6 Q. And then {DC6694/20}. Do we also see there's general  
7 discussion, I think, here there's Usman Khan likening  
8 himself to the lead character in Les Miserables. If we  
9 go to the previous page we'll see, I think, the context:  
10 "One of my favourite books is Les Miserables, that  
11 ... summarises ... like me an ex-con and the challenges  
12 they face when they turn their lives around".  
13 Does this give a flavour of the sort of  
14 communications you were having with him?
- 15 A. I think I had few communications with Usman, I think he  
16 texted occasionally and I think this is one example of  
17 him texting some things about what is going on in his  
18 life and what he's thinking. So this feels not  
19 uncharacteristic but also sometimes he sent things like  
20 this, sometimes he might have sent something different.  
21 But I don't think I had very many communications with  
22 him.
- 23 Q. Did you sometime after this put him in touch with  
24 a gentleman called Richard James, a former police  
25 officer who might be able to help with his employment?

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- 1 A. Yes. It wasn't about employment, I don't think, but the  
2 police officer was working with community-building and  
3 especially things around de-radicalisation which Usman  
4 was keen to get involved in. I don't think it was  
5 employment.
- 6 Q. If we look at {DC6694/28} I think we can see the text.  
7 JUDGE LUCRAFT: We can see a text, certainly.
- 8 MR HOUGH: We can see a text, it refers to Richard, a police  
9 officer who is involved in community-building work.  
10 We can take that off screen now. We know that  
11 arrangements were made around this time for  
12 a non-networked Chromebook to be made available to  
13 Usman Khan by Learning Together. Yes?
- 14 A. Yes. It was June.
- 15 Q. I'm sorry?
- 16 A. I think it was June that the Chromebook --
- 17 Q. The Chromebook was provided, I think, at  
18 a Learning Together event which Usman attended on  
19 12 June 2019, that was at Whitemoor?
- 20 A. Mm.
- 21 Q. I think you provided him with the computer at that  
22 event?
- 23 A. The computer was, yes, given -- I handed it over to the  
24 police officers who escorted him to that event.
- 25 Q. And in the aftermath of that visit, did you continue to

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1 communicate with Usman occasionally by text?  
 2 A. Yes.  
 3 Q. If we look at {DC6694/34}, another slightly hazy text, a  
 4 text from July 2019, saying that he has been busy  
 5 sorting things out with employment and housing and so  
 6 on, and then {DC6694/36}, there are some next  
 7 communications in September 2019 when you are asking if  
 8 he has moved into his new place, and he says yes, and  
 9 all is good.  
 10 A. Mm—hm.  
 11 Q. We can take that off the screen.  
 12 Moving on to then to arrangements for the  
 13 Fishmongers' Hall event, we have heard that Learning  
 14 Together built a relationship with The  
 15 Fishmongers' Company, its charitable trust?  
 16 A. Correct.  
 17 Q. Did you meet Ms Spolton, the grants officer for The  
 18 Fishmongers' Company, as part of those — as part of  
 19 that relationship?  
 20 A. Yes.  
 21 Q. Now, we've heard from Dr Ludlow about the grant  
 22 applications that were made and the grants that  
 23 followed, and about the organisation of the event at  
 24 Fishmongers' Hall.  
 25 Did you attend the visit to the hall on

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1 4 September 2019 when Dr Ludlow viewed it and checked  
 2 that it was suitable?  
 3 A. Yes.  
 4 Q. What did you think of the venue?  
 5 A. I thought it was a beautiful, well located venue which  
 6 was suitable for our purposes because there were several  
 7 rooms where we could do breakout sessions, there was the  
 8 capacity to have some food, so it seemed very good, and  
 9 very generous of the Fishmongers'.  
 10 Q. Did you, or anyone to your knowledge at  
 11 Learning Together, have any discussions with The  
 12 Fishmongers' Company about security for the event?  
 13 A. No.  
 14 Q. To your knowledge, did The Fishmongers' Company and  
 15 their personnel know what sorts of people would be  
 16 attending, ie that they would be including some serving  
 17 and released offenders?  
 18 A. Yes. At the Madingley Hall I sat next to someone who  
 19 was impressed with the three people from prison who took  
 20 part within that event, and also the event at which  
 21 Usman's video was shown, so that person was aware.  
 22 Q. Was that David Robertson, the former prime warden?  
 23 A. I believe it was.  
 24 Q. To your knowledge, did the people from  
 25 Fishmongers' Company know that those attending would

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1 include people who had been convicted of very serious  
 2 offences?  
 3 A. Yes, they had been present with us in Whitemoor, so they  
 4 knew that we worked with people with very serious  
 5 offences.  
 6 Q. So if it was said to you now by somebody from The  
 7 Fishmongers' Company that they didn't know specifically  
 8 that current or recently released offenders would be  
 9 attending, you would disagree with that, would you?  
 10 A. It would depend who was speaking. I would know that  
 11 there were some people who I would expect to have been  
 12 aware.  
 13 Q. But if somebody from The Fishmongers' Company were to  
 14 say that nobody in the senior reaches of that  
 15 organisation had any idea that current offenders might  
 16 be — current serving offenders might be attending, or  
 17 recently released offenders might be attending, would  
 18 you disagree with that?  
 19 A. I would find it unlikely.  
 20 Q. You would think it was wrong?  
 21 A. I would think it was unlikely. So I ...  
 22 Q. Now, did you, in these various discussions about  
 23 organising the event, see it as any part of your role to  
 24 discuss the level of security, given the profile of  
 25 people attending the event?

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1 A. I was not organising the event.  
 2 Q. And why not?  
 3 A. Because my colleague, Amy Ludlow, was organising the  
 4 event.  
 5 Q. I'm sorry, I didn't hear that?  
 6 A. My colleague, Amy Ludlow, was organising the event.  
 7 Q. May we move on to the day of the attack. You, I think,  
 8 that day travelled from Cambridge to London by train  
 9 with a colleague, arriving a little later than the rest  
 10 of the Learning Together group?  
 11 A. I was in a sharing assembly with my daughter so I didn't  
 12 arrive to London until 11.30, and I do know there has  
 13 been some evidence of people who have thought they met  
 14 me or I met them. I think they are confused about who  
 15 met them, it was not me. I arrived very late.  
 16 Q. We have heard about the various sessions that took place  
 17 from the opening session and the breakout sessions, and  
 18 we've heard that there was then a break at shortly after  
 19 1.30 that afternoon.  
 20 During that break, I think you spoke to both  
 21 Saskia Jones and Jack Merritt?  
 22 A. I did.  
 23 Q. We have seen a photograph of you with Jack Merritt  
 24 shortly before 2 o'clock.  
 25 After that, did you remain in the Banquet Hall until

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1 the events of the attack began?  
 2 A. I did.  
 3 Q. While you were there, what did you see or hear to tell  
 4 you that something very wrong was happening?  
 5 A. At first I heard screams and I thought they were  
 6 schoolchildren, and I thought why on earth have the  
 7 Fishmongers' got a school tour when we have got this  
 8 event on. And I left the hall immediately thinking  
 9 I was going to go to say to them "This is not suitable".  
 10 Q. As you left the hall, that would take you onto the  
 11 balcony.  
 12 A. Mm.  
 13 Q. Looking down from the balcony, what could you see?  
 14 A. I don't think I looked over the balcony, I think I went  
 15 down the stairs and I saw Saskia who laid herself down,  
 16 going up the stairs. I could see she was injured, and  
 17 somebody went to her.  
 18 Q. What did you --  
 19 A. I'd heard another scream. Sorry, I should say that in  
 20 between there was a second set of screams as I was  
 21 leaving, that sounded much more difficult, as I was  
 22 leaving the hall.  
 23 Q. Then you have described going down the stairs and seeing  
 24 Saskia obviously injured.  
 25 A. Mm--hm.

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1 Q. You have told us that somebody went to her. What did  
 2 you do?  
 3 A. I was running back to get my mobile phone to dial the  
 4 police and I saw Amy coming out and I said to her "Dial  
 5 999".  
 6 Q. Did you then seek to get some medical assistance?  
 7 A. I went into the hall and said "Is there a medic?" There  
 8 had been a medic who had been thinking of coming, and so  
 9 I went to say "Is there a medic?"  
 10 Q. What did you then do?  
 11 A. So I want to say -- the exact sequence of events is  
 12 difficult, I know that things have come back in flashes.  
 13 I left the hall and went -- I think I went back down the  
 14 stairs. I can't decide which bit came first of this,  
 15 whether I went back down the stairs and found Stephanie  
 16 on the stairs and took her with a colleague to the  
 17 toilets to keep her safe, or whether I -- there was  
 18 a point at which I stood at the top of the stairs and  
 19 I was making sure the guests were being evacuated out  
 20 the hall, that they didn't go down the stairs, so I was  
 21 standing at the top, directing people out, and making  
 22 sure that -- and I don't know which one of those  
 23 happened first.  
 24 Q. In the time that followed, in any event, at one point  
 25 you saw Ms Szczotko injured and you helped her to

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1 a position where she could get some help, and you also  
 2 helped in directing people out of the room as part of  
 3 the evacuation?  
 4 A. Correct.  
 5 Q. Now, in your statement you say that when you were down  
 6 the stairs, you were aware of shouting and fighting  
 7 going on, but your concentration was on Saskia; is that  
 8 right?  
 9 A. Yes. I didn't see any of the fighting. I find it  
 10 really odd that I didn't, but I -- I think I focused on  
 11 Saskia first and then I think I focused on Stephanie,  
 12 and I just haven't -- I did hear things going on, but  
 13 I really saw nothing. I think there's something of  
 14 tunnel vision, maybe, in these moments.  
 15 Q. Is it also right that in that early period, as we've  
 16 heard from Dr Ludlow, you went to provide first aid  
 17 assistance to Saskia?  
 18 A. Yes. So after people had got out and Stephanie was in  
 19 the toilets, I was in the toilets with Stephanie and we  
 20 saw she was injured, got her stable, and someone was  
 21 with her. I think maybe two people were with her.  
 22 I think it was my colleague Lisa Ghiggini, and the  
 23 police officer, Ann-Marie, and I went back down the  
 24 stairs. I remember coming out of the -- I remember  
 25 coming out of the toilets because -- I have maybe an odd

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1 personal history of Northern Ireland involvement, and as  
 2 a child, I used to run up the stairs and hide myself in  
 3 case an IRA person came through and I remember thinking:  
 4 I'm safe here, I have to go back out because of Saskia.  
 5 So I left the toilet and went down the stairs to where  
 6 Saskia was.  
 7 Q. Are you okay to go on? I know you want to get this over  
 8 with.  
 9 A. (The witness nodded).  
 10 Q. Once you got back to Saskia, did you provide her with  
 11 some assistance with some first aid?  
 12 A. Yes. When I'd seen Saskia and people with her, she was  
 13 responding at first. This is before, I think, going  
 14 with Stephanie. When I came back to her I think she was  
 15 not responding, and there was Adam, the prison officer  
 16 who was with her, Amy who was on her phone, and it was  
 17 decided that we would move her. So we moved her from  
 18 the stairs to a flat place at the bottom of the stairs,  
 19 and we started to do -- I started to do CPR. In my  
 20 memory I'm the only person who gave rescue breaths and  
 21 did compressions before the police arrived, and that was  
 22 not for a very long period of time. It was for,  
 23 I think, maybe about three rounds of compressions and  
 24 breaths and compressions and breaths.  
 25 Q. Now, you say that police arrived and took over, we have

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1 heard the evidence of those officers , I won't go through  
 2 that. Did you become aware after a time of armed police  
 3 entering the building?  
 4 A. So when the police arrived and we were with Saskia,  
 5 I got off her, and I want to say that we were speaking  
 6 words of love to her the whole time, and I got off her  
 7 and the police carried on doing the compressions.  
 8 I helped with some of the removal of her clothes, and  
 9 then the police asked us to get upstairs. They said: go  
 10 away, this is dangerous. So I went upstairs and then,  
 11 yes, a lot of armed officers arrived and it felt very  
 12 chaotic and really terrifying. There was a lot of  
 13 shouting and gunshots.  
 14 Q. Then after a time you were escorted from the building?  
 15 A. Yes, there were some excellent police officers who  
 16 really calmed a very difficult situation and kept us  
 17 safe, and then, yes, we were at some point told we could  
 18 be escorted out.  
 19 Q. That's all I intend to ask you about the events of the  
 20 day. I've just got a few more questions for you, and  
 21 these are concluding questions, very similar to those  
 22 I asked of your colleague, Dr Ludlow.  
 23 Looking at the history of matters that we've been  
 24 discussing, do you think that Learning Together has work  
 25 to do in improving its risk assessment and its risk

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1 management procedures either for events in prisons or  
 2 for events in the community?  
 3 A. I think that we are doing work with the university, so  
 4 I think it's hard to talk about Learning Together  
 5 because we worked within the risk management framework  
 6 of the University of Cambridge, and we worked together  
 7 with our colleagues in HMPPS. So together with the  
 8 University of Cambridge there has been an advisory body  
 9 who has reviewed risk management, and we will be doing  
 10 work with that advisory body moving ahead, and I also  
 11 think or know with HMPPS we have a working group that's  
 12 looking at risk management. So yes, is the answer, we  
 13 are doing that work with both prison colleagues and  
 14 probation colleagues on HMPPS side, and with the  
 15 university.  
 16 Q. I will be asking these questions of prison officers as  
 17 well --  
 18 A. Mm--hm.  
 19 Q. -- but you must have your own views of what practical  
 20 steps you could take to improve risk assessment and risk  
 21 management.  
 22 A. I think the -- within the university it would be very  
 23 appropriate to have a risk management process that  
 24 applies to extramural education activities which I think  
 25 extends beyond Learning Together, but would include it.

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1 I think that there needs to be a level of  
 2 accountability as to who owns that process. I think  
 3 there needs to be an agreed level of oversight as to who  
 4 reviews it. I think in relation to HMPPS it would be  
 5 very helpful to have a memorandum of understanding,  
 6 whereby the practice which I think already exists is  
 7 documented, so that we can ask them explicitly: this is  
 8 the activity that's happening on a form, this is  
 9 everything that's involved, we know that that  
 10 information has been communicated, and that we expect  
 11 communication of any risks that are relevant, and  
 12 I think we could include in that something like a check  
 13 box that says "Has there been any intelligence about  
 14 this person?" We don't need to know what that is, but it  
 15 could be communicated to us if that existed, so I think  
 16 we could do work with them to have some kind of a form  
 17 which would mean that there was open and transparent  
 18 communication to the extent it gave us the information  
 19 we needed.  
 20 Q. Now, looking back, do you consider that any of the  
 21 practical improvements you might identify, including  
 22 those, would have caused you and your colleagues at  
 23 Learning Together to deal at all differently with the  
 24 case of Usman Khan?  
 25 A. If we had been told that Usman, the information, the

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1 intelligence that is available, Usman Khan would not  
 2 have been invited to that event. Let me be clear: if we  
 3 had been told of those risks, of course he would not  
 4 have been invited.  
 5 MR HOUGH: Thank you very much. Those are all the questions  
 6 I have for you. Thank you, Dr Armstrong.  
 7 JUDGE LUCRAFT: Mr Pitchers.  
 8 Questions by MR PITCHERS QC  
 9 MR PITCHERS: Dr Armstrong, I'm Henry Pitchers, I ask  
 10 questions on behalf of the family of Saskia Jones.  
 11 I can say, I'm not going to ask you any questions  
 12 about the attack itself or the emergency response.  
 13 Could I just take you back to the question of  
 14 Prevent.  
 15 A. Mm--hm.  
 16 Q. And you confirmed in your evidence earlier that you have  
 17 undertaken Prevent training.  
 18 A. Correct.  
 19 Q. And I think at least once you actually referred to the  
 20 Prevent Duty in one of your answers to questions from  
 21 Mr Hough?  
 22 A. Mm--hm.  
 23 Q. Am I right that the training that you did was in January  
 24 of this year?  
 25 A. I undertook training in HMP Feltham, which was in --

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1 that was probably back in 2014. I have gone through the  
 2 Prevent Duty as a school governor, which would have been  
 3 in — and I've done it at the university, I've done it  
 4 more recently, which is when it became — I was asked to  
 5 do it, because now it's — you have to do it now.  
 6 Q. It's mandatory.  
 7 A. That's right, mandatory is the word I was looking for,  
 8 thank you.  
 9 Q. So the university Prevent training that you have  
 10 undertaken, that was in January of this year?  
 11 A. Correct.  
 12 Q. And I believe that you did module 1?  
 13 A. Correct.  
 14 Q. Could we please have up {DC5075/1} and perhaps — that's  
 15 it, just zoom in at the top there. The document that  
 16 we're looking at, as I understand it, it's a briefing  
 17 from Cambridge University in relation to the Prevent  
 18 Duty. Is it a document with which you're familiar?  
 19 A. No.  
 20 JUDGE LUCRAFT: Mr Pitchers, do we know the date of this  
 21 document?  
 22 MR PITCHERS: That was honestly to be my next point.  
 23 JUDGE LUCRAFT: Right.  
 24 MR PITCHERS: I suggest it's October 2016, but we can see  
 25 that if we turn to {DC5075/5} of this document.

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1 JUDGE LUCRAFT: Thank you.  
 2 MR PITCHERS: So we can see, I think, there the Prevent  
 3 Committee, a date of October 2016. Would I be right in  
 4 concluding that this briefing note was circulated  
 5 amongst staff of Cambridge University, either  
 6 in October 2016 or shortly thereafter?  
 7 A. I don't know.  
 8 Q. You don't remember?  
 9 A. No.  
 10 Q. But that doesn't seem like a wrong assumption on my  
 11 part?  
 12 A. I don't know.  
 13 Q. You don't know. Okay.  
 14 Could we go to the bottom of {DC5075/4}, so just up  
 15 one page, and here we have a subheading in this document  
 16 in relation to training, and it says there:  
 17 "All staff should be aware of the process of  
 18 radicalisation, definitions of extremism and how to  
 19 raise concerns in this context, and training is a key  
 20 part of the University's effort to raise awareness of  
 21 these issues. All staff are requested to complete  
 22 Module 1 — The Prevent Duty..."  
 23 Can you explain why, then, there is a delay to early  
 24 2021 in you undertaking this module?  
 25 A. Because I'd already undertaken Prevent training and

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1 because this is a request to complete it. So I was  
 2 aware of the process of radicalisation, I was aware of  
 3 the definitions of extremism, and also how to raise  
 4 awareness in those contexts.  
 5 Q. So you concluded that you were already trained and you  
 6 didn't need to do the training that was being mandated  
 7 by the university?  
 8 A. At that point I did not complete the training because it  
 9 was — I had already completed training and I was aware  
 10 of what I needed to be aware of, and it was a request,  
 11 so it was not required of me.  
 12 Q. Okay, so you didn't think it was required, but you also,  
 13 I think you're agreeing with me that you did consider  
 14 that you had been adequately trained in these matters?  
 15 A. Yes.  
 16 Q. Could we look, please, at document {DC6384/5}. It may  
 17 be the bottom half of that. Thank you.  
 18 So this on my reading is an email exchange between  
 19 you and a Loraine Gelsthorpe. Is that  
 20 Professor Gelsthorpe?  
 21 A. Yes, Loraine Gelsthorpe was the supervisor of the  
 22 research that I was undertaking.  
 23 Q. So at that point was she your line manager?  
 24 A. We don't tend to use those terms in academia, but that  
 25 makes sense.

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1 Q. Yes. But in terms of training and HR matters, she is  
 2 the person that you would report to?  
 3 A. Yes.  
 4 Q. And as I read this exchange, she emailed you with,  
 5 perhaps, two others, 13 November 2017, asking you to  
 6 complete the Prevent online training?  
 7 A. She does.  
 8 Q. And we can see in blue, at the top as we look at it  
 9 there, your response was the following day, in the  
 10 morning, and you asked to have a chat with Loraine and  
 11 you said:  
 12 "I feel somewhat of a conscientious objector. As  
 13 a school governor I also refused to take part in this.  
 14 I don't want to get you in a pickle but I really do feel  
 15 very uncomfortable about it. It's not just  
 16 an oversight..."  
 17 A. Correct.  
 18 Q. Now that doesn't fit with the answers you just gave,  
 19 does it?  
 20 A. Well, I can explain, if that's helpful?  
 21 Q. I think that's a reasonable response.  
 22 A. Thank you. I — as a school governor it's a statutory  
 23 duty that you have to go through the Prevent Duty, which  
 24 I did. When you are a school governor they have  
 25 requests to — if you want to, so they might have

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1 a special educational needs lead, you might have a --  
 2 you know, a lead in safety and security, you might have  
 3 a lead in the Prevent Duty. So I took part in a meeting  
 4 which is minuted where the Prevent Duty was discussed,  
 5 so that my statutory obligation was fulfilled that  
 6 I'm aware of it, I said that I did not want to do the  
 7 further training and be the Prevent lead, and I objected  
 8 and asked it to be noted in the minutes to some of the  
 9 conversation that took place as the Prevent Duty was  
 10 discussed, because I found the conversation  
 11 unacceptable, and I -- that relates to my conscientious  
 12 objections which is that I share some of the concerns  
 13 which are part of the government's current review of the  
 14 Prevent Duty, because of some of the ways that it is  
 15 sometimes used, but that does not mean that I did not  
 16 comply with my statutory obligations.

17 Q. Well, let's be clear, you were being asked by the person  
 18 who was senior to you, and was managing you, to complete  
 19 the Prevent online training, and that presumably is the  
 20 modules to which we've been referred earlier in this  
 21 case.

22 A. Correct.

23 Q. And you didn't say: I don't need to do that training,  
 24 I've already had training in this area, did you?

25 A. No, I voiced my concerns about the Prevent training.

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1 When I completed it in January, I completed it with  
 2 100%. There is no doubt that I'm well aware of the  
 3 Prevent Duty and have responded it to appropriately  
 4 within the --

5 JUDGE LUCRAFT: I think the point you are being asked, with  
 6 great respect, is why didn't you put in this email:  
 7 well, I went on a course at HMP Feltham?

8 A. Because I was raising my objections with Loraine about  
 9 this and we did have a chat about it.

10 JUDGE LUCRAFT: But you're making a rather different point  
 11 there.

12 A. Sorry.

13 JUDGE LUCRAFT: In your email response you're making  
 14 a rather different point. In answer to a question just  
 15 now you said: well, I went on training at HMP Feltham,  
 16 I felt I had had my Prevent training. Why not simply  
 17 say to Loraine Gelsthorpe: I did a training course at  
 18 HMP Feltham. Unless you tell me, I don't think I need  
 19 to do any further training. Why not simply say that?

20 A. Because I was raising the point with her that I had some  
 21 objections and I had some concerns around the Prevent  
 22 Duty, and that was what I wanted to discuss with her.

23 MR PITCHERS: As I say, it doesn't fit with the evidence you  
 24 gave earlier, and your explanation doesn't really fit  
 25 with what you said. You make a very strong proposition

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1 that you are a conscientious objector, a term that most  
 2 people are familiar with. What did you mean by the  
 3 phrase "conscientious objector"?

4 A. What I meant was that I share some of the concerns which  
 5 are within the current review that the government is  
 6 doing of the Prevent Duty and how it operates.

7 Q. That's all you meant by the words "conscientious  
 8 objector"?

9 A. That's right, that I had some objections --  
 10 conscientious objector, I think, is that I shared some  
 11 of those concerns. I do share some of those concerns,  
 12 but can I be clear that I am a -- I am a state-educated  
 13 working class northern lass and I work in one of the  
 14 most elite universities in the world, and I work and  
 15 involve myself to get the good from things. So  
 16 in March 2020, myself and my colleague, Dr Amy Ludlow,  
 17 had a meeting with the head of the Prevent Duty and with  
 18 Cressida Dick, and we were discussing with them about  
 19 how some of our work might contribute to some things in  
 20 Prevent. So because I have objections to some things  
 21 doesn't mean that I can't see the good in them and that  
 22 I can't work towards --

23 Q. I'm not asking you whether you see the good in it, but  
 24 I just want to be clear about your evidence, and the  
 25 reasons that you gave for seemingly refusing to undergo

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1 the training on the basis of being a conscientious  
 2 objector.

3 A. So the training was not at this time mandatory, and so  
 4 I did not --

5 Q. When did it become mandatory?

6 A. I don't know, but it is now mandatory, and that's why  
 7 I have completed it.

8 Q. You also say that as a governor that you refused to take  
 9 part in this. Not that you did the training and you  
 10 expressed some reservations about some details relating  
 11 to it?

12 A. I did refuse to do the further training. I was in the  
 13 meeting where the Prevent Duty was discussed with all of  
 14 the school governors and I did also in those minutes ask  
 15 to note my objections in the minutes.

16 Q. But you would accept that's not -- that doesn't fit  
 17 neatly with your response?

18 A. It's not -- it's a very quick email that I'm drafting  
 19 quickly and saying "can we chat about this", so I'm not  
 20 giving all of the detail in the email.

21 Q. No.

22 A. What I'm saying is: I think this would be better in  
 23 a conversation.

24 Q. But you would accept that this is contrary to the  
 25 evidence that you gave earlier, isn't it, as to why you

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1 were late doing the Prevent training?  
 2 A. I accept that it is — that I don't give all of the  
 3 information in this email, correct.  
 4 Q. Well, let's move on, if we can, to questions of risk  
 5 assessment and risk management.  
 6 Now, I think it's clear that there was in place no  
 7 risk assessment that governed community-based  
 8 Learning Together events in 2019, so there was no  
 9 Cambridge University Learning Together risk assessment  
 10 governing that?  
 11 A. Correct. Learning Together doesn't do risk assessments.  
 12 Just to say, there's no Cambridge University one. We  
 13 would comply with the risk assessments that were within  
 14 the university.  
 15 Q. We'll come on to talk whose responsibility it was, but  
 16 there wasn't one, was there?  
 17 A. No.  
 18 Q. And am I right that there still isn't one?  
 19 A. At the moment, all of Learning Together's activities are  
 20 paused, so it is correct to say that we have not yet  
 21 done that work, but also that until that work is done,  
 22 Learning Together's activities at the  
 23 University of Cambridge will not be resumed.  
 24 Q. I'll come on to deal with the question of suspension of  
 25 activities.

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1 Is there any timeline within which it is expected to  
 2 complete a risk assessment for these sort of  
 3 community-based events?  
 4 A. I'm sorry, I didn't understand your question.  
 5 Q. Is there a timeline by which it is expected to have  
 6 completed a risk assessment in relation to these  
 7 community-based events? Is there a plan as to when is  
 8 it going to happen? When is it going to happen?  
 9 A. Oh, so I would imagine — I would say before activities  
 10 resume, so we are still negotiating a lot of things with  
 11 the university, but before activities resume, yes,  
 12 I think those risk assessments — risk management  
 13 processes will be in place.  
 14 Q. Right. So it will be before activity is resumed, but at  
 15 this point you've no idea when those activities will  
 16 resume?  
 17 A. Correct.  
 18 Q. And is the reason that you didn't ensure that such  
 19 a risk assessment was carried out in 2019, because you  
 20 hadn't thought of it, or because you considered it and  
 21 considered it to be unnecessary or inappropriate?  
 22 A. I think it's because there wasn't a process for it.  
 23 Q. So because there was no Cambridge University protocol  
 24 for preparing these risk assessments, that's why neither  
 25 you nor Dr Ludlow did any work on such a risk

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1 assessment?  
 2 A. I want to say that it wasn't that we didn't think about  
 3 safety, it's that there wasn't — so I think  
 4 substantively we did, but I think there wasn't a process  
 5 to write that down on.  
 6 Q. Right. And had you given any thought to whether there  
 7 was an obligation that there should be a risk assessment  
 8 in place? Is that a thought that had occurred to you  
 9 before this attack?  
 10 A. I was aware that my other colleagues within the —  
 11 within their universities had risk assessment processes  
 12 and I was aware that Cambridge did not, and yes, we were  
 13 looking at matters of governance, and seeking to  
 14 establish our work within a more appropriate framework  
 15 of governance.  
 16 Q. Right. So had you actually discussed any plan to carry  
 17 out such a risk assessment for these community-based  
 18 events?  
 19 A. I think our discussions were much more about having the  
 20 overarching governance and risk framework, so I think  
 21 the safeguarding document that you looked at with my  
 22 colleague yesterday gives the framework for where our  
 23 thinking was around that.  
 24 Q. Right. And did you consider at that time that given  
 25 that Learning Together now had a number of employees,

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1 that that might, again, bring with it some obligation to  
 2 carry out risk assessment for work-related activities?  
 3 A. I think I was aware of the risk assessments that existed  
 4 for work-related activities that had been circulated  
 5 around my department.  
 6 Q. Did the fact that Learning Together had employees in  
 7 2019 make you consider that there was, if you like,  
 8 an extra need to ensure that there were proper risk  
 9 assessments in place for all activities?  
 10 A. I think that I realised that I had a duty to operate in  
 11 ways that did not put my employees at risk of harm, or  
 12 the University of Cambridge's employees who were working  
 13 with me.  
 14 Q. But that didn't necessarily include preparing risk  
 15 assessments for events such as the one at  
 16 Fishmongers' Hall?  
 17 A. No.  
 18 Q. No. And did you consider — we've heard about  
 19 employees, but of course there were lots of other people  
 20 attending the event. Did you not consider that as the  
 21 organisers of the event you had an obligation to ensure  
 22 that there was proper risk assessment?  
 23 A. Sorry, which event now?  
 24 Q. Well, certainly the event at Fishmongers' Hall.  
 25 A. So I believe we had completed any risk assessments that

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1 were relevant to that event. I'm aware now of the  
 2 university policy, which we have completed for being  
 3 here today, but I was not aware of that at the time.  
 4 Q. So I think the answer is that you didn't consider that  
 5 as organisers you should have a risk assessment for that  
 6 event?  
 7 A. With any other events that we have organised, what  
 8 happens is that the venue does the risk assessments  
 9 related to that event, and actually I have not, in terms  
 10 of any academic conferences that I've organised -- and  
 11 I have organised many -- ever done a risk assessment,  
 12 no.  
 13 Q. It would be fair to say that the venue itself didn't  
 14 have access to all of the knowledge that you had about  
 15 the event?  
 16 A. I can't speak to that because I was not organising it.  
 17 Q. Well, it goes without saying, doesn't it, that you knew  
 18 much more about the profile of people who were invited  
 19 and who were attending than The Fishmongers' Company?  
 20 A. I wasn't organising the event. I know that I knew who  
 21 was going to be going to that event, and I, in my  
 22 opinion, the Fishmongers' were aware of the nature of  
 23 people coming to that event, and they had a list with  
 24 us, and so in terms of high status people and people  
 25 being released from prison, I would imagine that they

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1 would have had that information.  
 2 So I think in general terms I agree with you,  
 3 I think -- sorry, I'm getting confused between my  
 4 generals and specifics.  
 5 Q. You can agree with me, you're allowed to agree with me.  
 6 A. I think in general, so I think there's something between  
 7 general and specific. I have lost my thread of thought,  
 8 apologies.  
 9 Q. I suspect we are not really at odds here. They had  
 10 a list of names of those who were attending?  
 11 A. Mm.  
 12 Q. Your evidence is that your previous discussions with  
 13 people from The Fishmongers' Company should have led  
 14 them to understand that there may well be serving or  
 15 former prisoners attending?  
 16 A. Yes.  
 17 Q. But you would agree, wouldn't you, that there's no  
 18 reason to think they would know anything like as much as  
 19 Learning Together did about further details of the  
 20 attendees?  
 21 A. Can I ask what kind of further information you think we  
 22 know that they don't know?  
 23 Q. Well, how about this one: that one of them was  
 24 a convicted terrorist?  
 25 A. I know that David Robertson was at that event in March.

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1 I know that he listened to Usman, so he knew the name  
 2 Usman Khan, I knew the name Usman Khan was on that list,  
 3 so I don't know that that is necessarily true.  
 4 Q. So you think that Fishmongers' Company may have known in  
 5 advance there was -- (overspeaking) --  
 6 A. What I'm saying is I don't think it occurred to me  
 7 before the incident that that was the case.  
 8 Q. No. Well, do you accept the general proposition that  
 9 Learning Together certainly knew more about those who  
 10 were attending than did Fishmongers' Company?  
 11 A. Yes.  
 12 Q. Which would put you in a much better position, wouldn't  
 13 it, to contribute to the risk assessment process?  
 14 A. I think we could have contributed to a -- if we'd known  
 15 there was a risk assessment process, we could have done  
 16 it, and I think we could have contributed.  
 17 Q. Yes.  
 18 A. Yes.  
 19 Q. Now they may have been in a better position to assess  
 20 risk of tripping over wires and knowing where the  
 21 emergency exits are, but in terms of any risks to do  
 22 with the personnel who are attending, Learning Together  
 23 was in a much better position to assess those risks,  
 24 wasn't it?  
 25 A. I disagree about the "much better".

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1 Q. You disagree with that?  
 2 A. The "much better", yes.  
 3 Q. Sorry?  
 4 A. With the "much better", I think "Learning together was  
 5 in a much better position..."  
 6 Q. How would you want to frame your answer to that?  
 7 A. That it could have been helpful if the -- if  
 8 Learning Together and the Fishmongers' had had a process  
 9 of a risk assessment that we went through.  
 10 Q. Now, we've heard that your knowledge of Khan's offending  
 11 history up to the point of the attack was really just  
 12 that he had been convicted of a terrorist offence?  
 13 A. Correct.  
 14 Q. So you knew no further details about it prior to the  
 15 attack?  
 16 A. So I knew, from his offending history, I obviously knew  
 17 what was in the content of the interview, but that was  
 18 more to do with behaviour within prisons, but that  
 19 obviously includes offences.  
 20 Q. So that extra knowledge might be what he volunteered in  
 21 the interview?  
 22 A. Correct.  
 23 Q. Could we please call up {DC6695/19}. Now, this is  
 24 a document that you have already been taken to by  
 25 Mr Hough, and as we established earlier, this is

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1 an exchange of emails, I think in January 2019, between  
 2 you and Mr Skelton, the probation officer?  
 3 A. Correct.  
 4 Q. And just so we're clear, it was Mr Skelton that asked  
 5 you to confirm that you were aware of his offences?  
 6 A. That's correct.  
 7 Q. And we can see your reply, which was that you were aware  
 8 of them to the extent that that was public knowledge,  
 9 essentially.  
 10 A. Mm—hm.  
 11 Q. And then you move on to say this:  
 12 "We are unaware of his specific risk factors."  
 13 You would agree, wouldn't you, that risk factors is  
 14 a broader matter than his offending history?  
 15 A. It's — it's a more specific matter, for sure.  
 16 Q. And risk factors that might have been identified at the  
 17 point that he was released from custody would be based  
 18 upon information gathered during the course of his time  
 19 in prison, the work done with him?  
 20 A. Yes, on his whole life that the probation officers would  
 21 have information on.  
 22 Q. And in a sense in terms of trying to understand his  
 23 offending in the future, probably the risk factors might  
 24 be more important than his historic offending history?  
 25 A. I think that's correct. It could be — I mean, I can

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1 see the offending history and the risk factors might be  
 2 linked.  
 3 Q. Oh, I'm sure they would be linked, yes.  
 4 A. Yes, but I think what I'm saying here is that what we  
 5 need is for information that is relevant to what we're  
 6 doing to be shared with us.  
 7 Q. Yes. So you said very clearly to Mr Skelton that you  
 8 were unaware of any specific risk factors?  
 9 A. Correct.  
 10 Q. And that's the only sensible way of reading that email,  
 11 isn't it?  
 12 A. Yes.  
 13 Q. And you then said:  
 14 "... and [we] are happy not to know this..."  
 15 A. "... not know, or to know ... to the extent this is  
 16 helpful, and he is happy for this information to be  
 17 shared with us."  
 18 So what I'm asking is if it is helpful for us to  
 19 know anything, then please share that with us.  
 20 Q. But you certainly were quite content to proceed, as you  
 21 did, without learning of those specific risk factors?  
 22 A. If I did not need to know them, yes.  
 23 Q. Well, you said you would be happy to know it to the  
 24 extent that it was helpful and he is happy for the  
 25 information to be shared.

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1 A. Can I be clear that I would rephrase this email  
 2 a million times now. But this email, I think, was  
 3 communicating one, we don't know, two, please share on  
 4 a need to know basis, which is that if I need to know  
 5 it, please share it with me. That's what I think  
 6 I'm communicating here. I understand that it is not the  
 7 best language. I regret that it is not the best  
 8 language.  
 9 Q. And what is it that you would have wanted to have  
 10 conveyed differently than you did here, because it reads  
 11 clearly, looked at in isolation, so it's interesting to  
 12 understand what it is you wish you had expressed  
 13 differently?  
 14 A. I wish I had said — well, at that time, so let me say  
 15 what I wish at that time I had said, and let me say what  
 16 I wish I would say — or what I would say now.  
 17 At that time I wish I had said "please do inform me  
 18 of any risk factors that are relevant to any activities  
 19 in which Usman might be taking part with us".  
 20 Right now, what I would hope is that we can work  
 21 with our colleagues to actually get some agreed  
 22 processes through which there is an understanding of  
 23 relevant information being shared between agencies that  
 24 are working with people with risks.  
 25 JUDGE LUCRAFT: Whilst with we've got this open —

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1 I'm sorry, Mr Pitchers — when you say about rewriting,  
 2 what about the very first sentence that Mr Hough asked  
 3 you about this morning, when he said what information in  
 4 the public domain. So it reads:  
 5 "We are aware of Usman's offences to the extent this  
 6 knowledge is in the public domain."  
 7 A. So I think what I'm communicating there is that I am not  
 8 aware of anything that is not public. I have not been  
 9 communicated anything by any of the HMPPS colleagues  
 10 relating to his risk.  
 11 JUDGE LUCRAFT: One of the points that Mr Hough asked you  
 12 about that is that a Google search — I appreciate you  
 13 took issue with a Google search — but an internet-based  
 14 search would produce fairly quickly the sentencing  
 15 remarks of Mr Justice Wilkie, which would, if you did  
 16 that, it would tell you the facts of the offences that  
 17 had led to his conviction.  
 18 A. Mm—hm.  
 19 JUDGE LUCRAFT: So one way of reading that first sentence is  
 20 "We are aware of Usman's offences to the extent this  
 21 knowledge is in the public domain". But that might give  
 22 to a reader the impression that you know what offences  
 23 as opposed to simply that it's a TACT offence, and what  
 24 the nature of the case was that went beyond just his  
 25 involvement.

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1 A. I can see that, and I think that is not -- that's  
2 correct, I can see it would communicate that and I think  
3 when I'm writing that sentence I was not thinking about  
4 law reports, but I take your point.  
5 Q. So in one sense, and I'm sure you didn't in any way  
6 intend to do this, it might have misled Mr Skelton to  
7 think you had a better understanding or a deeper  
8 understanding than you actually did, because you  
9 certainly didn't have knowledge to the extent that it  
10 was in the public domain; you just knew he had  
11 a conviction for a terrorist offence?  
12 A. My intention was not to mislead Mr Skelton.  
13 Q. Of course.  
14 A. And that question might be better for Mr Skelton, but  
15 I can see that this might suggest that I knew more than  
16 I did.  
17 Q. Yes. So would you agree that on an objective reading,  
18 and I am not suggesting you meant to mislead him, but on  
19 an objective reading, it would suggest that you had more  
20 knowledge than you actually did about him?  
21 A. It could suggest that.  
22 Q. Well, it does suggest that, doesn't it?  
23 A. I would be interested in what Kenneth Skelton thought  
24 that I knew.  
25 Q. Right, well we can ask him in due course.

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1 Just one last point on this. Would you also want to  
2 rephrase this response so that the provision of  
3 information wasn't dependent upon Khan giving his  
4 consent to it being disclosed?  
5 A. So yes, I think my answer is that it is -- what I would  
6 say is that transparent communication --  
7 Q. Yes.  
8 A. -- is generally best, and there is good evidence around  
9 that. I definitely can think of and know of times when  
10 it has been important for people to communicate in ways  
11 that are not transparent, so yes, I would rephrase that.  
12 Q. You wouldn't want to leave him with an ability --  
13 A. No.  
14 Q. -- to veto --  
15 A. An idea, exactly.  
16 Q. -- concerning information being provided?  
17 A. Yes.  
18 Q. Thank you. Can that come down from the screen, please.  
19 We have heard that there was an event in March 2019  
20 at Madingley Hall in Cambridge. Were you, if you like,  
21 taking the lead on organising that event?  
22 A. I was certainly --  
23 Q. Between you and Dr Ludlow?  
24 A. I was taking the lead on liaising with Kenneth and Usman  
25 around that event.

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1 Q. And as I understand it, the invitations went or  
2 certainly were mooted to at least one MP?  
3 A. Correct.  
4 Q. I think, is it Daniel Zeichner MP was invited. There  
5 was some talk of Heidi Allen possibly being invited.  
6 Was she actually invited?  
7 A. I can't remember.  
8 Q. And David Gauke whose name also appears, who was then  
9 the Lord Chancellor, was he invited?  
10 A. I have no recollection of David Gauke being invited.  
11 Q. I should say, and Daniel Zeichner did in fact ultimately  
12 accept the invitation and asked if he could bring his  
13 partner?  
14 A. He did.  
15 Q. Could we bring up, please, {DC6384/145}. Thank you.  
16 I'm not sure if you were in court yesterday to hear --  
17 A. I was.  
18 Q. Right, so I can probably get to the chase a little bit  
19 quicker. So you understand the context of this. It's  
20 an email thread, extra complicated because you're  
21 replying to questions that have been asked by someone  
22 else, the questions in blue, and what's in black here is  
23 what you typed in response.  
24 You'll see at the top that there had been a request  
25 for clarity as to the exact list of invites that had

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1 been sent out, and your response, which was to  
2 Dr Ludlow --  
3 A. Mm-hm.  
4 Q. -- was:  
5 "As per the document in the file under  
6 stewardship -- the one they have seen. Also sent to  
7 Heidi Allen and Daniel Zeichner. They may not be...  
8 there because removed them to send to probation for  
9 Usman... but they were on when cuidar saw list, so we  
10 can just say sent to invite list as discussed with  
11 them."  
12 Now, you heard the question yesterday that Dr Ludlow  
13 couldn't help me with. This does, on its face, suggest  
14 that there was a list sent to probation, presumably  
15 Mr Skelton, and that the two MPs had been removed from  
16 that list before it was sent to him. Is that what  
17 happened?  
18 A. I think that's what the email is saying had happened.  
19 What I would like to clarify is that we would not be  
20 working in any way non-transparently. So in the first  
21 email that is sent around this, which I think was pulled  
22 up earlier this morning, I am identifying upfront that  
23 the vice chancellor -- when I suggest to Kenneth that we  
24 could do this, I am saying the vice chancellor is  
25 present, so straightaway there are high status people

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1 who are communicated.  
 2 My memory is that we were having discussions with  
 3 CUDAR, who is the fundraising body of the university,  
 4 and they had opinions about who we could invite and who  
 5 we couldn't invite, and that we didn't know yet that we  
 6 could invite these people, so I think that's why they  
 7 have not been included at the time that it is sent to  
 8 probation, and actually, I think that we knew that  
 9 Usman -- I think had Usman been given permission to  
 10 come, obviously, as happened in the Fishmongers' event,  
 11 a full list of everyone who was attending would have  
 12 been sent.  
 13 Q. But at the time the list was sent to Mr Skelton, it was  
 14 the intention to invite an MP, whether it was going to  
 15 be two or one it maybe doesn't matter. That was the  
 16 intention. It may be it needed to be cleared?  
 17 A. I think we wanted to, I think that it was not clear that  
 18 we were going to be permitted to.  
 19 Q. Why not just provide the list as it was to Mr Skelton?  
 20 Why remove those names?  
 21 A. I think because we felt like -- I think underneath there  
 22 is a message, it's some messages from CUDAR that they  
 23 were frustrated with us because we were wanting to  
 24 invite these people and they weren't wanting us to. So  
 25 I think it's more to do with not getting in trouble with

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1 CUDAR than it is -- I can see it's difficult, but  
 2 I honestly can say that this was not a matter of taking  
 3 out names in order to somehow con probation, and you can  
 4 see clearly from the ways that we have worked in terms  
 5 of the Fishmongers' event that that is not the way that  
 6 we work with probation.  
 7 Q. It wasn't, if you like, to get the green light for Khan  
 8 to attend and then later on give the precise list of  
 9 attendees?  
 10 A. Absolutely not.  
 11 Q. I'm not suggesting he would have been sent along with  
 12 Mr Skelton still having a misleading list, but it wasn't  
 13 an attempt to manipulate the information to get the  
 14 green light?  
 15 A. That would have put not only the people who were  
 16 attending at risk but it would also have put Usman at  
 17 risk of breach of licence conditions. It would have  
 18 been unconscionable and no, it was not for that reason.  
 19 Q. I don't want to re-cover ground unnecessarily in  
 20 relation to the Fishmongers' Hall event, just to ask in  
 21 relation to an escort for Khan to attend the event and  
 22 come back to Stafford, as we know, that was how he was  
 23 transported to the event at Whitemoor in June of 2019,  
 24 and is it right that actually you were rather surprised  
 25 that there was no escort for Khan?

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1 A. Correct.  
 2 Q. And that's -- we will be hearing, I think, from her in  
 3 due course, and that also a sense of surprise that Lisa  
 4 Ghiggini shared with you?  
 5 A. Mm--hm.  
 6 Q. Can you explain why your reaction was one of surprise  
 7 when you realised he wasn't being escorted?  
 8 A. Yes, because Usman had been escorted to the event by two  
 9 police officers in Whitemoor. Whitemoor is  
 10 an environment with which he is familiar. He was being  
 11 met by security staff from Whitemoor, so the officers  
 12 were not needed to go into Whitemoor. They sat outside  
 13 while he was in that event.  
 14 This was an event where someone who has been in  
 15 prison for eight years is going to London, to travel  
 16 across London, and so my assumption was that in some  
 17 ways that resource would have been much better allocated  
 18 to that trip.  
 19 Q. Yes. So that in a sense you were surprised that  
 20 security measure that was a matter for the police and  
 21 probation hadn't been implemented by them to get him to  
 22 the event safely and to stay with him during the event?  
 23 A. My lens was more about support, but I think obviously  
 24 support and security go hand in hand.  
 25 Q. Yes. So just to turn to matters that post--date the

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1 attack itself, or come after the attack itself, could we  
 2 have, please, {DC6380/33}. The bottom half, please.  
 3 I think it may be {DC6380/34}. If we could just pause,  
 4 perhaps, we can see then an email sent by you to  
 5 Peter Dawson in the afternoon of 29 November 2019, and  
 6 if you can just go to {DC6380/34}, I think we then see  
 7 what you...  
 8 And, as I interpret it, Peter was asking after  
 9 your -- I think at that stage he hadn't realised the  
 10 extent of the involvement at Fishmongers' Hall, and you  
 11 explained to him that it, of course, had been at your  
 12 event.  
 13 Then you went on in the second and third line to  
 14 say:  
 15 "We may need your help to shape the narrative."  
 16 Can you explain what you had in your mind at this  
 17 point, why you felt that you were going to need to shape  
 18 a narrative?  
 19 A. Because there were a lot of people with criminal  
 20 offences involved, and that it would be important that  
 21 people like Peter Dawson, who have got relevant  
 22 experience, were speaking publicly, we were obviously  
 23 not going to be speaking publicly, and it felt helpful  
 24 to have his voice, which is a very trusted voice, as  
 25 someone who has been a governor of a prison and now

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1 works in the third sector, to speak to the issues which  
2 were all over the press.

3 Q. So it wasn't because you really immediately realised  
4 that Learning Together had got things very wrong in  
5 relation to Khan and very wrong in relation to the  
6 Fishmongers' Hall event?

7 A. This is 29 November. You have no idea about the state  
8 of my mind on 29 November. I'm not trying to do --  
9 I got home at 4.00 in the morning after being in the  
10 hospital meeting Jack's parents for the first time, and  
11 at 9 o'clock the next morning I was in Amy Ludlow's  
12 house assisting the police. No. I was not thinking  
13 that.

14 Q. Can we just look at some other emails where we get  
15 a sense as to how you responded to what had taken place,  
16 and if we could turn, please, to {DC6380/3}.

17 What you say then in relation to Khan is this:  
18 "Usman was a valued member of our community and we  
19 want to understand why his desire to die (which makes  
20 absolute sense in the abject lack of much hope and good  
21 in his life) played out in this way, and how we could  
22 work together to support people better as they love out  
23 of prison. We will do better in the future. Pray for  
24 all of our students in prison and beyond as we fathom  
25 this together."

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1 I appreciate that was still early on, but does that  
2 assessment as to what was going through Khan's mind, and  
3 you there expressing that it made absolute sense that he  
4 had this desire to die, does that remain your assessment  
5 as to what happened here?

6 A. Just to say that that should have been "move" out of  
7 prison, I think that's a typo.

8 Q. Sorry, which is the...?

9 A. The "love out of prison", I think should be "move out of  
10 prison".

11 Q. Oh right.

12 A. "... support people better as they move out of prison",  
13 is what it probably should say. It's a typo.

14 Q. Right, that makes a bit more sense.

15 A. I think that immediately after the incident my opinion,  
16 yes, obviously I had no information of any of the  
17 intelligence that has come to light since then.

18 Q. Yes.

19 A. And the only way that I could understand it, especially,  
20 I think, because of the fake suicide vest, was that it  
21 was -- that he was determined to be killed and that this  
22 was perhaps the only respectable way for him to do it --  
23 respectable, I have to say, in his -- in my  
24 understanding of his mind rather than in my mind.

25 Q. Of course.

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1 And then if we look at, I think it's {DC6380/27} of  
2 the same document, so the same day. And, look,  
3 I completely accept the turmoil you would have been  
4 going through, but it's just useful for the family to  
5 understand what your assessment was then and whether it  
6 has changed, because what you said in this email, was  
7 that:

8 "It was a 'fuck it' moment of the highest order from  
9 a man who tried so hard but there was no positive future  
10 for him. None. We are devastated but together we will  
11 forge ahead and honour Jack and our other students who  
12 have died. In love and solidarity."

13 A. I should explain the language in this, Mark Halsey is  
14 the first author on a paper that I co-authored with him  
15 with another academic. And the paper is called "Fuck  
16 it".

17 Q. Right.

18 A. It's an academic paper which is about moments of  
19 fatalism, so it draws on theories of Matza who has from  
20 1964 been talking about when people commit offences.  
21 The paper particularly looks at when people have been  
22 moving away from crime and desistance and when they then  
23 re-offend. So we know that most people who commit  
24 criminal offences move away over their life course, and  
25 we also know that that doesn't go from A to B like this

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1 (indicates), it sort of -- people go like this  
2 (indicates) and they often re-offend in ways as they  
3 move further away from crime.

4 Q. Yes.

5 A. Within that paper, one of the things that Matza says is  
6 that people need to understand themselves as cause in  
7 their life, and one of the things that his theory says  
8 that when you can't understand yourself as cause of your  
9 success, that one way to psychologically calm yourself  
10 is to be the cause of your own failure, even though  
11 that's only a temporary relief of the fatalism, the  
12 fatalist mindset.

13 So we in that paper draw on data from Australia,  
14 from the United States and from England, and at that  
15 point, yes, that was my analysis of the situation which  
16 is that everything we had been told was that Usman was  
17 trying very hard and doing very well and certainly that  
18 was our interactions with him. So that was my analysis  
19 at that point.

20 Q. Yes, and I should say I wasn't implying any criticism  
21 for using coarse language. Barristers are the worst for  
22 using coarse language.

23 So, again, would I be right in understanding that  
24 that early snapshot is not your current view as to what  
25 happened with Khan: that this was a "fuck it" moment,

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1 because we know about the planning that went on, don't  
2 we, now?  
3 A. I have to say that I know that there was security  
4 intelligence that was not shared ---  
5 Q. Yes.  
6 A. --- with us, but I don't know the content of that  
7 intelligence .  
8 Q. Right.  
9 A. So I don't know the --- so that's what I'm saying.  
10 Q. So although you know a little bit more about the  
11 intelligence , you still don't know enough to conclude  
12 whether this in fact was something that he had been  
13 planning whilst he was in prison?  
14 A. I have certainly heard that and it is very upsetting.  
15 Q. And in terms of the suspension of Learning Together  
16 activities , obviously in the early weeks and months,  
17 I'm sure that no one was really in a position to carry  
18 out the work that you were doing, for understandable  
19 reasons. What's the reason for it being suspended  
20 still , as we're about 18 months post? Why are matters  
21 suspended? Is it to do with the Inquest?  
22 A. It 's partly to do with the Inquest, I think the  
23 university wants to hear back from the Inquest so that  
24 we can feed recommendations into what's going forward.  
25 I think it 's partly to do with that and partly wanting

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1 to make sure that we do a very good job of finding the  
2 right institutional home within the university with the  
3 right governance. So it's those things. We've been  
4 working very carefully .  
5 Q. From your perspective, what is it that you hope to learn  
6 from your involvement in this Inquest hearing?  
7 A. I am here to give my evidence and I hope when we get  
8 everything back, we can learn what happened and learn  
9 the lessons of how to make sure we keep making chances  
10 for good for people and do so in a way that absolutely  
11 minimises the risks of ill .  
12 Q. Now, the reflections group that was established by the  
13 University of Cambridge to reflect on matters that have  
14 happened, and to come up with recommendations, as  
15 I understand it, they came up with two quite specific  
16 recommendations. Am I right, the first one was to  
17 convene an advisory board?  
18 A. Mm--hm.  
19 Q. And that that board would comprise an independent  
20 auditor and academic, ideally external to Cambridge  
21 University?  
22 A. Mm--hm.  
23 Q. And the second was to install an interim chief  
24 executive?  
25 A. Correct.

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1 Q. Have either of those steps happened as thoughts turn to  
2 restarting Learning Together events?  
3 A. The advisory body on risk has reported back and there's  
4 a lot more work to do on the basis of their report,  
5 which is a very helpful report.  
6 The second step that happened was that a strategic  
7 advisor was appointed, and yes, they have reported back  
8 in a very helpful report which actually sets out steps  
9 to take over the next 12 months, and actually recommends  
10 that the programme remain paused for the next 12 months  
11 while we put the steps in place.  
12 Q. No chief executive appointed?  
13 A. There was a problem with that recommendation, because  
14 you can't appoint a chief executive within the  
15 University of Cambridge. It was a misunderstanding,  
16 I think, from my academic colleagues, because within the  
17 University of Cambridge there wasn't an entity over  
18 which a chief executive could be appointed, so I think  
19 it was a slight misunderstanding.  
20 Q. Is that a corporate law question that's beyond me?  
21 A. Yes. I guess it's a little bit like if you have  
22 an inquiry or an inquest but you appoint a coroner  
23 before you have decided if you are having an inquiry or  
24 an inquest, and so they had to decide what happens first  
25 before they can decide that question.

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1 Q. I think you and Dr Ludlow did push back, in any event,  
2 against this suggestion of having a chief executive  
3 appointed?  
4 A. I think what we said is we would like --- if you have the  
5 document we could look at it, but I think what we said  
6 is we absolutely recognised the need for governance and  
7 oversight, but that we felt that it was putting the cart  
8 before the horse for the exact reasons that I've just  
9 explained.  
10 Q. Yes. And as I read it also, you did push back somewhat  
11 in relation to the question of risk assessment; would  
12 you agree with that?  
13 A. I have no recollection of that. You would need to ---  
14 Q. Isn't it right, we can call that if we need to, it is  
15 just one sentence ---  
16 A. Is it okay, I have that document in here, can I have a  
17 look at it in my ---  
18 Q. If we're going to look at it, we should all have a look  
19 at it. I think it's {DC6728/1}. I think it's the  
20 bottom half, I'm going to try and find it now.  
21 I think it's the last --- I'll read the sentence and  
22 then I'll try and find it. In relation to safety and  
23 well-being you write:  
24 "We nevertheless highlight the considerable resource  
25 implications of individually assessing each and every

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1 activity ."

2 A. So I think what we are asking for there is a standard

3 framework that we can use. I think that there was

4 again, a misunderstanding about the nature of the work,

5 because we work across lots of different colleges within

6 Cambridge. So we are saying, I don't know where you

7 are, but under the heading "Safety and well-being".

8 Q. It might be the top half, actually .

9 A. We say:

10 "It will be imperative for the university to provide

11 clear and consistent guidance about risk assessment so

12 that colleagues from a wide range of different

13 disciplines can follow an appropriate proportionate

14 process to ensure safety and well-being."

15 Q. So, just so we're clear, because of course the family

16 need to understand what changes might happen and whether

17 there's a chance of this sort of event happening again,

18 you weren't seeking to suggest that there should be --

19 there are cost implications in relation to risk

20 assessment that ought to --

21 A. I think -- and the advisory report that has been done on

22 risk absolutely notices the cost implications, and we

23 were meaning to say that because absolutely what we are

24 saying is that to do this well, we need to understand

25 that it needs to be funded appropriately. So absolutely

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1 we were saying yes, let's think about doing this well

2 and let's think about the resource that it needs to do

3 it well.

4 Q. So is it a request for further resources for the risk

5 assessment process itself?

6 A. It wasn't a request for further resources for the risk

7 assessment process, it was a request to understand that

8 if we are going to do something well, it needs to be

9 resourced appropriately.

10 MR PITCHERS: Sir, those are all my questions.

11 JUDGE LUCRAFT: Thank you.

12 Mr Hough, I'm going to suggest we take a break

13 there, simply because we've been going for an hour and

14 a half, but we will have a short break, I think.

15 MR HOUGH: Sir, yes.

16 JUDGE LUCRAFT: We'll literally just have a quick comfort

17 break, I think, everyone, just 10 minutes, please, if we

18 can. Thank you.

19 (In the absence of the jury)

20 MR HOUGH: Sir, it's not that I have an arid concern about

21 the timetable, it's that Lisa Ghiggini has been waiting

22 all day and we would like to get through her evidence if

23 possible. We will have about an hour after our break --

24 JUDGE LUCRAFT: Yes.

25 MR HOUGH: -- assuming that you are prepared to sit a little

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1 late.

2 JUDGE LUCRAFT: Yes.

3 MR HOUGH: I don't know how long each other advocate wishes

4 to be with, first of all, Dr Armstrong, and

5 Lisa Ghiggini. I anticipate that I shall be about

6 20 minutes with Lisa Ghiggini and I shall not cover the

7 events of the day, because I think that we have covered

8 her participation in those sufficiently, and that I can

9 bring out the other material to do with her in

10 20 minutes or less.

11 It may assist, in order to get through her evidence,

12 if everyone can identify whether they wish to question

13 Dr Armstrong or Lisa Ghiggini, and if so, for how long.

14 JUDGE LUCRAFT: Yes.

15 MR PITCHERS: For what it's worth, I don't anticipate having

16 questions for Lisa Ghiggini if the core matters in her

17 witness statement are adduced by Mr Hough.

18 JUDGE LUCRAFT: Thank you.

19 Mr Armstrong, I suspect you have some questions for

20 the current witness?

21 MR ARMSTRONG: I do, sir, I'm trying to keep them down, but

22 I think I'm half an hour.

23 JUDGE LUCRAFT: Right.

24 MR ARMSTRONG: I don't have much for Lisa Ghiggini. I've

25 got one issue, a very specific thing that I want to ask

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1 about. If Mr Hough doesn't cover that then I will want

2 to cover that but it is one thing.

3 JUDGE LUCRAFT: Yes, but certainly the approach I know that

4 Mr Hough has taken thus far is to be as comprehensive as

5 he can in relation to all of the witnesses, quite

6 properly. So it may be, Mr Armstrong, that that point

7 is covered.

8 What I'm going to suggest, Mr Hough, is that we --

9 I'm going to, whilst the jury are having their comfort

10 break, I'm just going to ask that an enquiry is made of

11 them that if we sit a bit late, does that put any of

12 them at inconvenience, because at least if we've got

13 that, the answer to that question being it doesn't, then

14 we will sit to complete what we can.

15 MR HOUGH: Yes, sir. Thank you.

16 JUDGE LUCRAFT: I'll rise.

17 (3.33 pm)

18 (A short break)

19 (3.44 pm)

20 JUDGE LUCRAFT: Yes, Mr Armstrong.

21 Questions by MR ARMSTRONG

22 MR ARMSTRONG: Thank you.

23 Dr Armstrong, I'm Nick Armstrong, I act on behalf of

24 the family of Jack Merritt.

25 Can I -- I'm going to try and take this as quickly

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1 as I can, I know you have been on the stand a while.  
 2 Can I just go to the evaluation process because  
 3 I just want to cover something off on that. Could  
 4 I have Dr Obsuth's witness statement, which is  
 5 {WS5068/3} up, please, and page 3 of that. So at the  
 6 bottom, please, and then going over to page {WS5068/4}.  
 7 Thank you very much.  
 8 So she says, and I'm just checking with you,  
 9 Dr Armstrong, that the dates are right:  
 10 "I mentioned above that in 2016 I became involved in  
 11 research aimed at evaluating the effectiveness of  
 12 Learning Together. Our first goal was to develop a  
 13 rigorous methodology for measuring the effects of the  
 14 programme, so as to assess whether it was delivering on  
 15 its potential".  
 16 If you then just go over the page:  
 17 "... [begins] to develop a battery of measures ...  
 18 the measures we identified included self-esteem,  
 19 perspective taking, self-efficacy, interpersonal  
 20 efficacy and social inclusion ... we began collecting  
 21 data on our chosen measures in 2017. For the first year  
 22 after I left the university for my job in Edinburgh..."  
 23 And then it goes on:  
 24 "... 2019 we were... [beginning] data analysis with  
 25 the goal for dissemination. We have recently reached

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1 the point of publishing our first analysis in a research  
 2 paper..."  
 3 Then there's a reference to the article which is in  
 4 fact the article that I went to with Dr Ludlow, which is  
 5 the 2020 article, in the Prison Service Journal.  
 6 Firstly, are you happy with those dates, those dates  
 7 are accurate?  
 8 A. She doesn't explain the -- so what she's talking about  
 9 is the quantitative data which is what she's worked on  
 10 with us, but the research includes more than  
 11 quantitative data.  
 12 Q. I'm not sure I understand the significance of --  
 13 A. Sorry, so quantitative data would be questionnaires.  
 14 Q. Certainly.  
 15 A. And the statistics that we gather from questionnaires,  
 16 and Ingrid has specifically worked with us in that  
 17 aspect and so the dates are correct to that aspect.  
 18 But, no, the research and the practice has always been  
 19 hand in hand, so it's been from the very start in 2015  
 20 was the research process.  
 21 Q. What I'm understanding -- what I'm interested in here is  
 22 simply that the first data analysis and the work that is  
 23 being done in relation to the -- at this stage I think  
 24 it's based on Grendon -- is done some time after the  
 25 decision is taken to roll out to Whitemoor in 2017?

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1 A. So the data analysis has happened from the start of the  
 2 project.  
 3 Q. Yes.  
 4 A. What we were -- the grant that we got from the British  
 5 Academy to evaluate is a process evaluation. The  
 6 process evaluation is evaluating the process of learning  
 7 and so what there is is a qualitative component in which  
 8 you thematically analyse qualitative data, which could  
 9 be field notes and it can be interviews, and then you  
 10 develop ways to measure what it is that you are  
 11 observing.  
 12 Q. Yes.  
 13 A. So it was in fact one of the publications you brought my  
 14 colleague to yesterday, the first publication was a  
 15 thematic analysis, so that qualitative analysis, out of  
 16 which we have then worked to develop the measures that  
 17 Ingrid is talking about here.  
 18 Q. I understand, but am I entitled to say that the first  
 19 analysis that's published analysis on this programme is  
 20 the 2020 article?  
 21 A. No, that's wrong.  
 22 Q. So was there --  
 23 A. That's just using the quantitative data that she's  
 24 talking about.  
 25 Q. Well, tell us then, what evaluation of the Grendon

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1 programme had been done before 2017? So 2017 this  
 2 programme is in Whitemoor and Usman Khan is on it.  
 3 A. So from the start in Whitemoor it was evaluated, as well  
 4 as -- so there's always the option for every student to  
 5 be involved in research. Actually, that's not entirely  
 6 true. There is always the option for students on some  
 7 courses to be involved. So there will be some courses  
 8 that have not been through the evaluation. Partly  
 9 that's to do with length of course and methodological  
 10 reasons. But certainly since 2014, the work has been  
 11 evaluated in Grendon and in Whitemoor.  
 12 Q. Right. Is it done before 2017 when it's introduced into  
 13 Whitemoor? Do you take the time to evaluate --  
 14 A. It was introduced into Whitemoor, let me correct  
 15 yesterday -- because yesterday some information wasn't  
 16 correct, and that is that Whitemoor was the second  
 17 prison we went to. So it started in Grendon, it went to  
 18 Whitemoor in 2016, and then it progressed into Warren  
 19 Hill after that.  
 20 Q. Right. Can I just put this to you, this is the reason  
 21 why I'm going -- and I know that Warren Hill, it's there  
 22 by 2017 --  
 23 A. Mm-hm.  
 24 Q. -- so it's all -- and we know that 2019 is the five-year  
 25 anniversary, so Learning Together starts in 2014, we've

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1 seen that in the material.  
 2 A. Yes, the first recruitment happened in 2014. The first  
 3 course started in January 2015.  
 4 Q. What I'm looking for is this, and perhaps the dates  
 5 don't --- perhaps they don't help very much, is there are  
 6 real issues --- and I don't want to get into a to and fro  
 7 about the detail of how you evaluate a programme like  
 8 this, but there are some of it I need to go to --- there  
 9 are real issues about taking a programme from somewhere  
 10 like Grendon into somewhere like Whitemoor because the  
 11 risk issues and the demographics of the prisoner  
 12 population you are dealing with are very different; can  
 13 you and I agree on that?  
 14 A. I disagree on that. There's another thing I'd like to  
 15 correct on that, and that is that a dispersal prison is  
 16 called a dispersal prison not because people are --- not  
 17 only because people are dispersed around the country,  
 18 but because high risk people are dispersed among lower  
 19 risk people, so there are many cat B prisoners within  
 20 dispersal prisons and Grendon is a cat B prison, so you  
 21 might get people of a very similar risk in Grendon as  
 22 you do in Whitemoor.  
 23 Q. But in Grendon, which is a B and a C prison, there it is  
 24 a therapeutic community?  
 25 A. Correct.

1 Q. And a therapeutic community has ---  
 2 A. I don't think Grendon is a C, I think it's just a B cat.  
 3 Q. We have heard evidence, I think we heard evidence,  
 4 I think we'll get evidence from the Prison Service that  
 5 it's B and C in Grendon.  
 6 A. Okay, well Rich and Vince would be ...  
 7 Q. But in any event, it's an entirely therapeutic  
 8 community?  
 9 A. It is.  
 10 Q. Which means that people have been tested and they are  
 11 settled and they have committed to therapeutic work and  
 12 they are adjudication free for I think the last three  
 13 months, all of those things. They look very different  
 14 to Usman Khan?  
 15 A. I know of people convicted of terrorist offences very  
 16 similar to Usman Khan who have been to Grendon.  
 17 Q. But they won't have --- they won't be high risk  
 18 category A prisoners in Grendon?  
 19 A. Their risk would have been reduced by the time they were  
 20 transferred to Grendon.  
 21 Q. Absolutely, but not just reduced in the way that they  
 22 have gone down the categories, not that they have gone  
 23 from --- I mean, he would have go high risk cat A, cat A,  
 24 B, and into a therapeutic community within all the  
 25 criteria that they have. That's a very, long way away

1 from Usman Khan's position in 2017?  
 2 A. That feels correct.  
 3 Q. Okay. Can I put this to you as well: there are issues,  
 4 and we've talked a little bit about them today, about  
 5 the extent to which a programme like yours, which is  
 6 drawing out feelings, is drawing out issues of self  
 7 identity and self-efficacy, and the process of research  
 8 that we've looked at with the video that you did with  
 9 him in March 2019, and the research paper afterwards,  
 10 how suitable is that for somebody who might be someone  
 11 who is gaming the system, being deliberately deceptive,  
 12 have status issues, have narcissism issues, there are  
 13 real issues about that, you and I would agree?  
 14 A. I would absolutely hope that my HMPPS colleagues would  
 15 identify people they thought too risky to take part in  
 16 the courses and they would not be admitted.  
 17 Q. Yes.  
 18 A. Can I be clear that I don't think that the category of  
 19 the prison is a good way to make that analysis, and  
 20 I don't think about it because of good research evidence  
 21 by Alison Liebling, and Alison Liebling did research  
 22 evidence within the high security estate specifically  
 23 looking at the kinds of environments where you might  
 24 develop radical --- the kinds of stories that radicalised  
 25 people develop, black and white thinking, and political

1 charge, and what she found was that there were some very  
 2 good high security prisons where political charge was  
 3 much less because they were high trust environments  
 4 where risk was policed relationally, and she found that  
 5 there were some high security prisons where the risk was  
 6 much more, so there is a way that --- what she calls then  
 7 "failed state prisons" as the prisons where people are  
 8 more likely both to be involved in radicalisation and to  
 9 be involved in violence linked to radicalisation, and  
 10 I make this point because her research also looks at  
 11 better prison environments and reduced risk of  
 12 re-offending, and shows links between those. She's done  
 13 research for many, many years and so it's really  
 14 important that we think about really good prison  
 15 environments, I absolutely agree with you, but that we  
 16 don't think about it in terms of which category of  
 17 prison, because you could have a very good high security  
 18 prison and a very bad local B cat.  
 19 Q. The problem is this: if you extend into a place like  
 20 Whitemoor, you are more likely to encounter people like  
 21 Usman Khan who are complicated high risk individuals?  
 22 A. That's true.  
 23 Q. There are complicated issues including ethical issues  
 24 for you and risk issues for the Prison Service about how  
 25 you do that, and I'm going to suggest to you that we

1 have seen that in stark terms in the video and the  
2 research interviews, all right, and let me just --  
3 I don't want to be too mean to you about this, but that  
4 video, as Mr Hough has put to you, he absolutely tells  
5 lies in that video. He absolutely says things that are  
6 wrong in that video.

7 Now, it's not the only place -- I'm just going to  
8 put that to you, and I think you accept that. It's not  
9 the only place that he does that. I don't want to go  
10 into the detail of this, but one of your colleagues,  
11 Ellie Brown, has given a statement that I think may be  
12 used or read into the proceedings in due course, he  
13 talks to her about segregation at around the same time,  
14 and he talks about things like the physical implications  
15 of being in segregation: my speech, my eyesight, my  
16 sensitivity to noise, all of those things have changed  
17 as a result of this long period of time in segregation.  
18 That's all delusional. None of that happened. There's  
19 no evidence of any of that, okay?

20 After the video he is rewarded for the video.  
21 Simon Larmour has told us about the fact that the video  
22 was played at the event, there was feedback to Usman,  
23 and Usman was told "This is all brilliant, you've done  
24 really well, congratulations", and Usman was happy about  
25 that.

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1 You would agree, wouldn't you, that there are issues  
2 with doing that for somebody who is the kind of prisoner  
3 that Usman Khan was?  
4 A. I think it is vitally important that people, especially  
5 people like Usman Khan, who have risks like that, can do  
6 positive things and can be praised for them, and in our  
7 understanding with the information that was given to us  
8 at that time, that is exactly what that looked like.  
9 JUDGE LUCRAFT: But I think the point Mr Armstrong is making  
10 is that this information was false.  
11 A. I know that now.  
12 JUDGE LUCRAFT: Yes.  
13 A. I did not know that at the time.  
14 JUDGE LUCRAFT: But I think the question is about  
15 verification of it.  
16 A. Sorry, maybe I have misunderstood the question.  
17 JUDGE LUCRAFT: You present it in this way as his video  
18 interview.  
19 A. Sorry, I think I might have misunderstood the question.  
20 MR ARMSTRONG: Well, what I'm essentially putting to you is  
21 this: there are these issues, and these issues, as the  
22 learned coroner is putting, where you may be told things  
23 that are false, that may be used by him as part of  
24 fulfilling a narrative, encouraging him to fulfil  
25 a false narrative, and feeding into his distorted world

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1 view, which is a dangerous thing to do.

2 Now, the concern that I put to you about this, and  
3 I'm asking you whether this was wise, is that whatever  
4 the dates of where the evaluation is done and what kind  
5 of evaluation is done at what stage, you're into  
6 Whitemoor with all of those risks in 2017, only  
7 three years after Learning Together starts.

8 Now, that evaluation must have been limited or  
9 incomplete at that stage?

10 A. The evaluation is always ongoing, so -- so -- but what  
11 I would say is that going into Whitemoor, everything  
12 that we have done through Learning Together has been  
13 approved by superiors at the University of Cambridge at  
14 every step and has been approved through negotiation  
15 with HMPPS, but I can tell you that we have at times not  
16 gone to prisons where we have gone and had meetings,  
17 HMP Manchester is an example, and have felt that the  
18 prison was not safe for us to be operating there, and so  
19 have said we will not, under these conditions, come and  
20 run a Learning Together community.

21 So I absolutely take your point that we need to make  
22 sure that there is effective safeguards and we should  
23 not go into a prison if we don't think that they are  
24 there, but that was not the experience with  
25 HMP Whitemoor.

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1 Q. Well, what was the thinking -- when you had done -- when  
2 you were doing Grendon, which as I have said is a very  
3 specialist kind of place, and you were looking  
4 presumably at this stage at Warren Hill, which is a very  
5 specialist sort of place, why jump directly to  
6 category A Whitemoor from those two prisons? Why not  
7 just try a local prison in cat B or something at that  
8 stage?  
9 A. There were long term, long-standing research  
10 relationships between the Institute of Criminology and  
11 HMP Whitemoor.  
12 Q. What were those?  
13 A. Alison Lieblich has carried out research over many, many  
14 years and I think is actually heading back there at the  
15 moment to do more research there, including lots of  
16 dialogues groups, so there was a long history of work at  
17 Whitemoor that we were moving into. We weren't starting  
18 something new in terms of that research relationship, it  
19 pre-existed us.  
20 Q. And so that's why you jumped from Grendon to Whitemoor  
21 because there was a pre-existing relationship?  
22 A. And because of conversations with HMPPS colleagues who  
23 encouraged that.  
24 Q. You see the point though: this is gone into -- Grendon  
25 to Whitemoor is a very big leap, and it has gone

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1       horribly wrong. Would you accept you may have been  
 2       a bit swift in rolling this out --  
 3       A. No, we were not swift in rolling it out. It took about  
 4       a year to negotiate the partnership with Whitemoor, it  
 5       was done very carefully. And I want to also tell you  
 6       that there are -- I have known of people released from  
 7       high security conditions and then supervised by the CRC,  
 8       not by the National Probation Service. CRC, Community  
 9       Rehabilitation Companies, are lower risk people; NPS is  
 10       higher risk. So it's not true that everybody who comes  
 11       out and is released from Whitemoor would be at that  
 12       level. Khan was very highly supervised, but that's not  
 13       always true.  
 14       Q. But when you're doing this process, and I don't want to  
 15       spend too much longer on this, because I think the jury  
 16       has the point in relation to this, is that it's not just  
 17       the fact that it's cat A, it's not just the fact that  
 18       it's terrorism, it's the fact that it's high risk cat A  
 19       and he is somebody who is about to be released, hugely  
 20       unusually, from those conditions onto a programme or  
 21       involved in a programme like yours which is expressly  
 22       about release as well as custody. Now, that required  
 23       time and care, and what I'm inviting you to reflect on  
 24       is whether you were a bit fast. You're saying no.  
 25       A. Absolutely not. We planned meticulously with HMPPS

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1       colleagues to go into the prison, and obviously Usman  
 2       didn't come onto the course until -- I think we'd  
 3       already been in the prison for a year before that time,  
 4       so it's not like we were going in for that.  
 5       Q. But you say planned meticulously. We haven't got any  
 6       documented discussions about high risk cat A prisoners  
 7       and whether they should be on Learning Together  
 8       programmes, and we don't have, at the moment -- we'll  
 9       wait to hear what kind of security sifting was done.  
 10       Are you sure this wasn't a bit swift and a bit cursory,  
 11       at least from your point of view?  
 12       A. Can I say that prison and university partnerships were  
 13       already operating in HMP Full Sutton, and had been  
 14       operating, I think, since 2015, and in HMP Frankland  
 15       from 2015, maybe 2014 in Frankland. So it is not that  
 16       we were doing something that was not already done in  
 17       lots of other places.  
 18       Q. It went wrong very quickly though, in the first five  
 19       years?  
 20       A. If you look at the British Academy application, it  
 21       always planned to do multi-site action and research.  
 22       Q. They may have been wrong.  
 23       A. The idea was to understand learning of people in prisons  
 24       and to understand context, and we were interested and  
 25       are interested in the kinds of environments that mean

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1       that learning does the good that you would hope it would  
 2       do. So we wanted to measure individuals and we wanted  
 3       to measure different contexts, and it's important that  
 4       we know that for prisons.  
 5       Q. All right. The reason why I'm slightly pressing you on  
 6       this is I was pressing Dr Ludlow yesterday, at the end  
 7       of yesterday, about why not introducing  
 8       category-specific exclusions, and Dr Ludlow's answer  
 9       very clearly to me at the end of yesterday was: I'm not  
 10       doing it without a clear research base and some  
 11       principled reason.  
 12       But your answer to this is, you're not prepared --  
 13       she says you're not prepared to introduce  
 14       category-specific exclusions without a clear research  
 15       base, but you are moving on from Whitemoor -- from  
 16       Grendon to Whitemoor when research is still ongoing, to  
 17       use your word. You are prepared to take risks in that  
 18       direction but not the other?  
 19       A. I don't think that was taking a risk, and it's not --  
 20       Q. Well, it obviously was.  
 21       A. If I've gone to a prison -- nothing has happened within  
 22       HMP Whitemoor. I think I would agree with you that it  
 23       is not helpful for public safety for people to be  
 24       released from high security prisons to the street,  
 25       I absolutely agree that. But within HMP Whitemoor,

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1       that -- I don't think that there is evidence of ...  
 2       Q. But the chances of that -- it's also not helpful if that  
 3       is happening to put them on a programme where they go to  
 4       London to a high security, high profile event?  
 5       A. It is certainly not helpful that information was not  
 6       shared with us.  
 7       Q. All right.  
 8       A. Can I say something to you. Prior to Learning Together,  
 9       in previous research, I have taken part, I have done  
 10       research in high security estate before. There has been  
 11       someone who was released from a high security prison and  
 12       was coming to an event at Cambridge, not  
 13       a Learning Together event, prior to Learning Together,  
 14       and we did get a telephone call from the prisoner  
 15       governor that said there was police intelligence about  
 16       that person and that person was not invited, he was  
 17       uninvited, to not come.  
 18       Q. Yes, I mean, I will be asking a number of other  
 19       witnesses why they didn't make that call to you more  
 20       than once.  
 21       A. Thank you.  
 22       Q. And let me go on to that issue, because this is where  
 23       your answer has been slightly different to your  
 24       colleague's, because you have told Mr Hough and  
 25       Mr Pitchers that if you had known what is known now,

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1 your actions would be different, and I just want to  
 2 flesh that out a little bit, and I saw also your answers  
 3 to my learned friend Mr Pitchers about the email that  
 4 you had written --  
 5 A. Mm--hm.  
 6 Q. -- about security information and you wish it had been  
 7 different, and I can see -- tell me if I've got this  
 8 wrong -- that you are somebody who is desperately  
 9 wishing you had had more information?  
 10 A. Absolutely.  
 11 Q. Yes. So the way I'm reading that is, you do want to  
 12 satisfy yourself, you don't just want to leave it  
 13 completely to others, because you do have your own  
 14 responsibilities?  
 15 A. We have a responsibility to keep people safe and in  
 16 order to do that we need to know any risks that are  
 17 relevant to that activity, and I think yes, we could  
 18 have a memorandum of understanding and a documented  
 19 process through which we do that more effectively.  
 20 Q. Well, can I just take the opportunity to explore what  
 21 that might be and how that might have been different.  
 22 What I want to understand is, the information that  
 23 you would have wanted, first of all.  
 24 A. Mm--hm.  
 25 Q. Now, you know already that he's a convicted terrorist,

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1 you know already that he's category A, and you know  
 2 already that he's high risk category A.  
 3 A. Mm--hm.  
 4 Q. And you know what that means. Is it just the  
 5 intelligence?  
 6 A. So I have to say, I would definitely want to design that  
 7 form with HMPPS colleagues, because I think what I --  
 8 Q. Sorry, which form?  
 9 A. So if there were a form, that's in my mind, and  
 10 I'm speaking off the hoof now, right, so I have to say  
 11 that I'm not a risk manager, and when we talked about  
 12 resource and risk managers earlier I thought to  
 13 myself: yes, one of the resources I'd like is that I'd  
 14 love to have training in risk management, because that  
 15 would be helpful. I -- so just thinking on the stand,  
 16 literally --  
 17 Q. I know.  
 18 A. -- I would say that a form that would -- where we could  
 19 write out exactly what the event is and exactly what is  
 20 happening and so that colleagues could say to us what is  
 21 it that they need to know, the colleagues in the HMPPS,  
 22 and then where we have agreed information--sharing  
 23 relevant to that: these are the things that you need to  
 24 know in order to do that safely, and I think we could  
 25 have a check box that says: is there intelligence

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1 relating to this person that would be relevant to this.  
 2 It's not that we then do the risk assessment about  
 3 whether they can take part or not, it's that we know  
 4 that we can take care of those risks, any risks that  
 5 they think don't preclude someone taking in, so I'm not  
 6 saying we would ever make that decision, they say they  
 7 can take part or they can't take part, but if they took  
 8 part, these are the things you might want to be aware  
 9 of. So, you know, for example, it might be on that that  
 10 someone would say: we are concerned about grandiose  
 11 ideas, and so therefore if you are doing this video --  
 12 when I went to do that video the only things that I was  
 13 told was to be very careful about having any filming  
 14 things outside so that Usman wasn't -- the AP, the  
 15 approved premises wasn't identified, and to be inside,  
 16 to go into the room that was allocated to us and so that  
 17 he wasn't sort of picked out amongst his friends.  
 18 I was not told: be careful about grandiose  
 19 narratives, I was not told: make sure you are  
 20 fact-checking. So I could have been told those things,  
 21 if that was identified as a risk. It was never  
 22 communicated to me.  
 23 Q. But can I put this to you: because those things are  
 24 difficult, it may be unrealistic to say to somebody --  
 25 if we're going to have research of this kind done in the

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1 world, it may be unrealistic to say to somebody like  
 2 you: think about grandiosity, think about narcissism,  
 3 think about grievance thinking, thinking about this,  
 4 that and the other, it may just be better to say: we  
 5 know that there is a particular problem with that kind  
 6 of issue in this kind of context, have a category  
 7 exclusion?  
 8 A. But that is -- I see your point and I wish it were true,  
 9 because it would be easy, but unfortunately it is not  
 10 true, and the reason it's not true is because what you  
 11 do there is you get a whole group of people, let's say  
 12 ten of them -- let's say nine of them are going to  
 13 succeed and one of them would be excluded, but you're  
 14 going to exclude all ten, and actually what you're doing  
 15 is excluding them all from a protective factor that  
 16 could mean that they go on to do good things. So what  
 17 you want to do is trust HMPPS to say: we can identify  
 18 the risks and we're going to exclude this person or else  
 19 we think these risks can be managed.  
 20 So I go back to the example of community--led  
 21 initiatives and the work that they do in mentoring in  
 22 the community, that probation communicates to them the  
 23 risks that are relevant to that activity, because we  
 24 know that that activity, just as with education, is  
 25 really important to public safety.

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1 Q. But you say that if you knew now what you knew then, he  
2 wouldn't have been at the event.  
3 A. That's right, because that is a very relevant reason, so  
4 if we had been told: no, there is intelligence that he's  
5 planning another suicide attack --  
6 Q. Is it that that's the key for you? The planning the  
7 event in November 2018? The intelligence suggested --  
8 A. If any communication from a colleague in HMPPS -- you  
9 can see that with Madingley Hall, when they said he  
10 can't come, we said: okay. So I would expect that they  
11 would make a call on it. If they said to us: manage  
12 this risk, and we felt like it wasn't manageable, we  
13 would have to say: sorry, we can't mitigate that risk.  
14 So you're saying that you think we can, but we're saying  
15 we can't, so we could make a call on it then, but unless  
16 I know what the risk is, I'm assuming that they're going  
17 to say if they think that shouldn't happen, and then  
18 I am assuming I'm going to say, if they want me to do  
19 something and I think actually that's not something  
20 that --  
21 Q. But let me understand this. Is it the intelligence that  
22 suggested he was planning an event in -- that  
23 intelligence was in November 2018 -- is it that which  
24 triggers your reaction that says he wouldn't have been  
25 there if we had known that, or is it the other matters

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1 in the history that Mr Hough has taken you to? So, for  
2 example, radicalisation, bullying, there's evidence  
3 about grooming other prisoners for enforcement purposes  
4 on the wing, those sorts of matters?  
5 A. Risk is static and its dynamic, and so I would be taking  
6 the opinion of the probation officer at that moment,  
7 what they're communicating to me at that moment.  
8 I can't assess, you know, I'm not qualified to assess  
9 all of the history and all of the impact and how that  
10 is --  
11 Q. So that means you're back into some form of  
12 individualised risk assessment rather than a category  
13 exclusion?  
14 A. Absolutely, an individualised risk assessment.  
15 Q. And that means you run the risk of it going horribly  
16 wrong because a ball is dropped or because the risk  
17 assessment is too difficult?  
18 A. 1% of people with serious violent offences re-offend.  
19 4-7 -- sorry, 1% of people released by the Parole Board.  
20 4-7% of people with serious violent offences re-offend.  
21 It's very unlikely.  
22 Q. Those percentages are in the population as a whole, as  
23 you know, there's not a high risk category --  
24 A. No, no, that is the -- I take your point, it would be  
25 with serious further --

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1 Q. The risk with a 0.1% starting point is much higher.  
2 A. I don't know that that's true. What we do know from  
3 research is that people convicted of terrorist offences  
4 desist. So the age crime curve across the life course  
5 shows how people move away from crime and people  
6 convicted of terrorist offences also move away from  
7 crime. We're hearing about Usman Khan but there are a  
8 lot of people who have been released from prison with  
9 TACT offences who have not re-offended.  
10 Q. But you know that -- I'm not going to get into this  
11 debate in this venue, but you know that the nature of  
12 terrorism offences is that there is no particular  
13 standard and they are all different, and therefore the  
14 extent to which longitudinal research is done on them is  
15 limited.  
16 A. So I don't know the former part, but I absolutely agree  
17 on the latter part that more research is needed, that  
18 I do agree.  
19 Q. Can I just ask you about one other matter, which is just  
20 a very brief matter.  
21 Ellie Brown's witness statement says that when she  
22 was at Grendon there was a -- there was some training  
23 about boundary-setting, and for the lawyers in the room  
24 it's {WS5054/7}. She talks about some training in  
25 Grendon, about being a course facilitator, but then she

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1 talks about a session that says about boundary-setting  
2 for the duration of the course in Grendon. Do you  
3 happen to know anything about that course and what it  
4 involved, or that programme or that session?  
5 A. It's the session that you went through. I mean, I don't  
6 know specifically, but it would be the session that  
7 you've gone through with Amy yesterday, that's the  
8 security and boundary sessions.  
9 Q. The security session, all right.  
10 Thank you very much, Dr Armstrong, that's all  
11 I wanted to ask.  
12 A. Thank you.  
13 JUDGE LUCRAFT: Can I just check, Mr Griffin, there's no one  
14 else? No.  
15 Mr Griffin.  
16 Questions by MR GRIFFIN  
17 MR GRIFFIN: Sir, I'm going to be very quick.  
18 Just a few documents I want to take you to, please.  
19 First of all, can we put up on the screen, please,  
20 {DC6695/39}. Thank you. Could you go to the bottom of  
21 the page, please?  
22 Can we see there an email from you to Ken Skelton on  
23 6 March, so the day after you had been to the approved  
24 premises?  
25 A. Mm-hm.

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1 Q. Can we see that you are saying:  
 2 "Thank you so much for facilitating the meeting with  
 3 Usman last night. It felt really important. I will do  
 4 my best to process the video today and send over to you  
 5 ahead of your meeting tomorrow." {DC6695/40}.  
 6 Was the position then that you provided the video to  
 7 Ken Skelton to review before it was shown at the  
 8 Madingley Hall event?  
 9 A. Correct. And MAPPA reviewed it as well.  
 10 Q. Thank you. I just want to stick with the 5 March event  
 11 and just look at a couple of communications that you had  
 12 with Usman Khan shortly after the visit, please. Can we  
 13 put on the screen {DC6381/10}. This is in reverse  
 14 chronological order. Can we see at the bottom there,  
 15 these are texts between you and Usman Khan, to be clear.  
 16 Can we see at the bottom a text from you, outgoing, to  
 17 Khan:  
 18 "Just home. So good to see you too Usman and know  
 19 you are well. Worth the drive. Thanks so much for the  
 20 video. Can't wait to show Amy!"  
 21 And as we go up the page, can we see a series of  
 22 communications on 10 March. What is the significance of  
 23 10 March? Do you recall?  
 24 A. No.  
 25 Q. Well, maybe I can remind you: I think that's his

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1 birthday.  
 2 A. Okay.  
 3 Q. And can we see, for example, a communication on the 10th  
 4 at 22.35 from Usman Khan to you:  
 5 "No worries about missing the call. Yes, it was  
 6 a lovely day, seen all my nieces and nephews, they're  
 7 almost two whole football teams!"  
 8 And the top communication from Usman Khan to you:  
 9 "When I got back the chef at hostel had made a cake  
 10 with candles!"  
 11 So were these the kind of communications you were  
 12 having with Usman Khan shortly after attending in  
 13 Stafford?  
 14 A. Sometimes, I mean he often mentioned how well he got on  
 15 with the people at the AP in particular.  
 16 Q. Thank you.  
 17 The last thing I want to do is to take you to  
 18 a document I wanted to show to Dr Ludlow, but it wasn't  
 19 possible to put it on the screen.  
 20 Can we put up, please, {DC6695/75}. Just to set the  
 21 scene, top of the page, please. Sorry. {DC6696/75}.  
 22 Thank you. Just the top, thank you.  
 23 This is, just to set the scene, an email from Amy  
 24 Ludlow to Amy Spolton, who was the grants officer at  
 25 Fishmongers' Company, and we can see:

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1 "Following up on our short conversation, please see  
 2 updated application attached with links to the Whitemoor  
 3 report."  
 4 Can we now go to {DC6696/76}, and this is the last  
 5 document I want to ask you about. So, were you involved  
 6 in the drafting of this application, which is for the  
 7 community-builder role?  
 8 A. I would have read it but I wasn't involved in drafting  
 9 it.  
 10 Q. Can we just look at a couple of parts of it, right at  
 11 the top, can we see under "Background". You talk about  
 12 Learning Together as an initiative, and you move — if  
 13 we can move down to just expand the portion under "Our  
 14 work together with you so far", can you see just at the  
 15 start there:  
 16 "Earlier this year, Learning Together benefited from  
 17 the generous support of the Fishmongers' Charitable  
 18 Trust, through a donation of £10,000. This donation  
 19 enabled us to transform a disused industrial workshop in  
 20 one of the University of Cambridge partnerships with  
 21 HMP Whitemoor."  
 22 Then to the bottom of the page, please, yes, "What  
 23 we would like to achieve next":  
 24 "As a result of the new Study Centre, and a renewed  
 25 commitment from HMP Whitemoor to our partnership we have

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1 prepared even more ambitious plans for collaboration at  
 2 Whitemoor for the academic year ahead, an outline of  
 3 which is below."  
 4 Can we go now over the page to the bottom of the  
 5 page, please, so {DC6696/77}, "How we hope you might  
 6 help". So this is the most significant part of the  
 7 application:  
 8 "As part of Whitemoor's commitment to our  
 9 partnership working, we are delighted to share that the  
 10 prison has pledged an investment of £60,000 towards  
 11 running the curriculum of activities detailed above.  
 12 This will cover the non-staff costs of our activities  
 13 and will make a contribution of £20,000 towards staff  
 14 costs."  
 15 And there you can see in the final paragraph on that  
 16 page, they are talking about needing to extend capacity  
 17 to coordinate and manage the activities and to build  
 18 mechanisms to support students' continued positive  
 19 engagement, and, as it says:  
 20 "... between courses and as they move through their  
 21 sentences beyond Whitemoor."  
 22 And you go on there to talk about the role of  
 23 a community-builder, and then the key responsibilities  
 24 of the community-builder would be to, and can we just  
 25 have the top bullet point on the next page, please:

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1 "Develop and implement best practice systems and  
2 practices for keeping in regular contact with  
3 Learning Together students and alumni, including  
4 students who move through the prison estate and are  
5 released from prison."  
6 Then, sorry, there is one final document, can we  
7 move to {WS0444A-25/1}. I'm not going to wait for that.  
8 Are you aware that the deputy clerk at the  
9 Fishmongers' Company wrote to Dr Ludlow on  
10 25 October 2019, so that dates the application,  
11 informing her and Learning Together that the trustees of  
12 the Fishmongers' Charitable Trust have awarded the  
13 grant --  
14 A. Yes.  
15 Q. -- in the sum of a little over £30,000, and in principle  
16 for a further two years? So is this the kind of  
17 information that was being provided to  
18 Fishmongers' Company by Learning Together in the months  
19 preceding the event at Fishmongers' Hall?  
20 A. Correct.  
21 MR GRIFFIN: Sir, those are the questions I have.  
22 The last thing I wanted to do was just to ask  
23 whether you had anything you wished to say before  
24 I finish asking you questions?  
25 A. I would like to say three things. I would like to say

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1 that I grieve Jack and Saskia and will do so every day.  
2 I work with some of the most outstanding students in the  
3 world, and Jack and Saskia both sparkled within that  
4 group. I would like to say that I absolutely abhor and  
5 condemn the actions of Usman Khan and the damage that he  
6 has caused so many people, and I will do everything in  
7 my power to work well into the future so that we can  
8 maximise the chances for good, and minimise the risks of  
9 ill .  
10 And I want to finally, like my colleague, thank  
11 those who saved so many lives that day and acknowledge  
12 the police and the security services and the paramedics,  
13 and I want to especially name an officer called  
14 Caroline Fisk whose name I remember because she was  
15 outstanding in terms of professionalism, kindness and  
16 efficiency in the most difficult circumstances.  
17 MR GRIFFIN: Sir, those are my questions.  
18 JUDGE LUCRAFT: Thank you.  
19 MR HOUGH: Thank you very much, Dr Armstrong, that's all we  
20 have for you.  
21 JUDGE LUCRAFT: Thank you very much.  
22 MR HOUGH: Sir, the final witness is Lisa Ghiggini. Just  
23 before she is brought onto the stand, let me say  
24 something very quickly.  
25 JUDGE LUCRAFT: Yes.

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1 MR HOUGH: A number of questions were asked of the last  
2 witness referring to intelligence .  
3 JUDGE LUCRAFT: Yes.  
4 MR HOUGH: We have all been referring to it compendiously so  
5 far. May I just say that the jury will hear about it in  
6 detail from next week, when each piece of intelligence  
7 was from, and to whom it was available.  
8 JUDGE LUCRAFT: Yes.  
9 MR HOUGH: For example, the piece of intelligence referring  
10 to Usman Khan returning to his old ways, believed to be  
11 terrorism, was intelligence from, I think,  
12 late October 2018, so his late months in prison, but the  
13 jury will hear about the timing and content of  
14 intelligence in detail from next week.  
15 JUDGE LUCRAFT: Thank you. I'm sure that's very helpful for  
16 the jury to hear that, Mr Hough. Thank you.  
17 MR HOUGH: Lisa Ghiggini, please.  
18 MS LISA GHIGGINI (affirmed)  
19 JUDGE LUCRAFT: Good afternoon. Please sit if you would  
20 prefer to sit, and if you are happy to, please feel free  
21 to remove your mask.  
22 Can I say, I'm very sorry you have been here all  
23 day, I know, waiting to give evidence, and we are --  
24 I'm very grateful to the jury who have said that they  
25 can sit a little bit later, and we all anticipate your

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1 evidence in fact will not take too long, but that's not  
2 to say that we're going to rush your evidence, all  
3 right. But as I say, my apologies you have been kept  
4 waiting a long time.  
5 Mr Hough.  
6 Questions by MR HOUGH QC  
7 MR HOUGH: Would you please give your full name for the  
8 court record?  
9 A. Yes, it's Lisa Ghiggini.  
10 Q. Ms Ghiggini, you understand I'm asking questions first  
11 on behalf of the Coroner and that there may be questions  
12 from other lawyers afterwards. You made a main witness  
13 statement for police on 2 December 2019, and a number of  
14 shorter witness statements, I think you have them there  
15 and you may refer to them as you wish.  
16 By way of background, in November 2019 were you  
17 employed as a part-time administrator in the  
18 Institute of Criminology at the University of Cambridge?  
19 A. Yes.  
20 Q. In that capacity, were you communications lead for  
21 Learning Together?  
22 A. Yes.  
23 Q. Is it right that you were involved in some of the work  
24 arranging the event at Fishmongers' Hall  
25 in November 2019?

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1 A. Yes.  
 2 Q. And also that you had some communications with alumni of  
 3 Learning Together courses?  
 4 A. Yes.  
 5 Q. In your role, were you involved in some communications  
 6 with and relating to Usman Khan?  
 7 A. Yes.  
 8 Q. I think it's right that you had had communications with  
 9 Usman Khan from shortly after his release  
 10 in December 2018, but you first met him at the event at  
 11 Fishmongers' Hall in November 2019?  
 12 A. Yes, that's right.  
 13 Q. When you first came into contact with him, shortly after  
 14 his release at the end of 2018, did you know anything  
 15 about his offending history, what he had been convicted  
 16 of?  
 17 A. I'm not -- I might have known that he had been in for  
 18 terrorist -related offences, but if I -- yes, I think  
 19 I might have known that actually, yes. Yes.  
 20 Q. Did you have a number of telephone calls with him over  
 21 the course of 2019?  
 22 A. Yes.  
 23 Q. As a result of those communications, what did you come  
 24 to know about his background?  
 25 A. Well, I found out that he was from Stoke and he -- well,

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1 quite a lot of things really. I found out that he was  
 2 from Stoke, he had a few brothers and sisters, I can't  
 3 quite remember now how many, he'd grown up in Stoke,  
 4 he'd -- he told me -- I mean, this is all from his  
 5 perspective, so I didn't know what was true and what  
 6 wasn't true.  
 7 He said that his family were originally from  
 8 Kashmir. He was Muslim. He told me about kind of  
 9 being -- what do you call, my mind's gone blank -- not  
 10 when you're expelled from school but when you're --  
 11 suspended.  
 12 Q. Suspended.  
 13 A. He got suspended from school and he was telling me that  
 14 he couldn't tell his family that he was suspended so he  
 15 was pretending to go to school still. He told me that  
 16 he lived on his own from a young age, I didn't really  
 17 understand this. He told me quite a lot of things...  
 18 do I need to carry on, or? Would you like me to carry  
 19 on?  
 20 Q. Let me focus on a couple of things. Did you have any  
 21 impression of his religious faith from these  
 22 communications?  
 23 A. Well, I knew he was a Muslim because obviously he had  
 24 been in for terrorism offences, but I got the impression  
 25 that he wasn't that religious, although I do remember

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1 that he had done Ramadan at some point and was quite --  
 2 and then after that, you know, but I did get the  
 3 impression that he wasn't that religious. He didn't  
 4 really say that he prayed that much. That's my  
 5 impression.  
 6 Q. What was your overall impression of his character and  
 7 his mood from your interactions?  
 8 A. Sorry, what was the last bit of the question?  
 9 Q. What was your overall impression of his character and  
 10 his mood from the conversations you had?  
 11 A. Yes, so at the beginning he was, like, really chatty,  
 12 really hopeful, he was happy to be out, he would sort  
 13 of, you know, talk a little bit about his time in prison  
 14 and he would talk about his family. He was generally  
 15 quite hopeful, I would say, and quite chatty. He had  
 16 restrictions on him. He -- so I remember he would --  
 17 he -- yes, he had restrictions on him, I remember now  
 18 what I'm trying to say, and he was supposed to go and  
 19 visit his family, but because of the restrictions, which  
 20 I didn't really know in great detail, he was scared to  
 21 go and visit his family in the beginning, so that kept  
 22 sort of -- you know, he kept saying: right, I'm going to  
 23 go and visit them on the Sunday, but then maybe he was  
 24 a bit too scared about the roads being closed or  
 25 whatever, so eventually he managed to see his family but

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1 that took some time, so there were restrictions there,  
 2 but he was quite happy, chatty, enthusiastic for  
 3 Learning Together.  
 4 He -- you know, he was sometimes troubled, he  
 5 referred back to the considerable time he spent in the  
 6 CSC unit in prison. He was in the CSC unit, I think, he  
 7 told me, for a long time and then in segregation for  
 8 a few months.  
 9 Q. Can I just pause you there a little?  
 10 A. Yes.  
 11 Q. So do we have the idea right, that you are having  
 12 telephone calls with him from time to time in which he  
 13 discusses life, the universe and everything?  
 14 A. Yes.  
 15 Q. And you hear a bit about his family, as you've  
 16 described, and his -- how he's getting along, and you  
 17 also discuss with him matters of life and religion, just  
 18 to discover what you've told us. You've told us that he  
 19 was generally happy and chatty and that he would also  
 20 sometimes revert to life in prison when discussing his  
 21 life.  
 22 These communications, it would appear, sometimes  
 23 didn't seem to be going anywhere in particular; they  
 24 were just catch-up conversations; is that right?  
 25 A. Yes.

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1 Q. Was there a development in those communications, or the  
2 lack of them, over the summer of 2019?  
3 A. Yes, that's right. I think he -- yes. The  
4 communications sort of petered out in the summer of  
5 2019.  
6 Q. Did you have any impression at the time about why they  
7 were petering out?  
8 A. No, I don't think I did, I just -- I was kind of quite  
9 glad to get on with my work in some ways.  
10 Q. When he did get back in touch, how long had passed?  
11 When was it the communications resumed?  
12 A. I'm not -- you know, it's probably --  
13 Q. If it helps you to look at your statement, it's towards  
14 the top of page 3 where you say the communications  
15 resumed in September of 2019. Page 3 of your main  
16 statement, about four or five lines down.  
17 A. Oh yes, thank you. Yes. In September the  
18 communications resumed, that's right, and he had become  
19 more withdrawn, so he was less chatty, more sort of  
20 direct, less sort of, you know, if I would phone him,  
21 for example, he would be like "I've got to go" which was  
22 fine, because I thought, well, he's obviously got things  
23 that he's doing, but yes, he was less chatty.  
24 Q. So there's a gap in communications. When they resumed  
25 he's more withdrawn, quicker to break off the calls.

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1 Now, I'm now asking you just to expand a little, so  
2 it's not in your statement necessarily, but thinking  
3 back to those calls from September 2019, did you notice  
4 anything other than that he was more withdrawn, less  
5 voluble?  
6 A. No. I don't think so, not that I can remember.  
7 Q. Did you also sometimes have communications with his  
8 probation officer or police officers managing him?  
9 A. Actually I had communication with them around the  
10 Chromebook that he was given, but I hadn't had  
11 communication with them after that, it was Amy that  
12 dealt with his probation officer and his police officer,  
13 but if you're referring to where it says --  
14 Q. At the moment -- just listen to the questions, I'm just  
15 asking you for the moment about what communications you  
16 had with them. You said you had some communications  
17 with them about the provision of the Chromebook, the  
18 jury have heard all about that, that was the run-up  
19 to June 2019, and I know you refer in your witness  
20 statement to a communication shortly before the London  
21 event. Were there any other communications of note that  
22 you remember with his police officers or probation  
23 officers?  
24 A. No. Not that I remember, because I didn't really  
25 communicate with them.

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1 Q. As you say in your witness statement, you refer to a  
2 communication with one of the police officers who was  
3 responsible for managing Usman Khan, which was a couple  
4 of weeks before the November 2019 London event.  
5 A. So the witness statement was when the police came round  
6 the day after the event, the attack, so I was still in  
7 shock, so it was actually when it -- I've written in my  
8 statement that a couple of weeks before Calum had  
9 asked -- said he was concerned, but that was actually  
10 what he had said to Amy, so it came from Amy, it was Amy  
11 that said to me that Calum had said that he --  
12 Q. Sorry, may I interrupt you. The jury obviously haven't  
13 seen your witness statement.  
14 A. No.  
15 Q. So I'm not asking you to describe how things are or  
16 aren't the way they are in your witness statement; I'm  
17 just asking for your recollection.  
18 A. Okay, so --  
19 Q. You had a conversation with a police officer involved in  
20 managing Usman Khan?  
21 A. I didn't have that conversation with him.  
22 Q. You didn't?  
23 A. No, that's what I mean, this statement was done when  
24 I was in shock and so it's not fully explained, but it  
25 was Amy that came to me and said: Calum has said that

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1 Usman seems like -- he's concerned because Usman's  
2 stopped going to the gym and he's sleeping in late, so  
3 can you phone him or can you get him to do something for  
4 the event so that you can engage him, so that we can  
5 engage him.  
6 Q. Okay, so you're sitting there in your office or  
7 whatever --  
8 A. Yes.  
9 Q. -- at the Institute of Criminology --  
10 A. Yes.  
11 Q. -- Dr Ludlow speaks to you and says she has heard  
12 something from PS Forsyth, one of the officers  
13 responsible for managing Usman Khan.  
14 Just to run through that again, Dr Ludlow tells you  
15 that PS Forsyth is concerned because Usman has stopped  
16 going to the gym and is sleeping in late. And what  
17 Dr Ludlow suggests is that you get Usman Khan to do  
18 something productive for the event, in order to boost  
19 his spirits --  
20 A. Yes, yes. Yes.  
21 Q. Please put it in your own words.  
22 A. Engage him, I think, it was so that they were engaging  
23 him in something positive, yes.  
24 Q. And did you do something to that effect?  
25 A. I did, yes. So I phoned Usman and asked him to produce

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1 something, and he wrote a poem, which he then dictated  
 2 back to me on the phone, and then I printed it out,  
 3 posted it to him so that he could see if it was all  
 4 okay, and then we went through some changes on the  
 5 phone.  
 6 Q. Were there any other communications that you had with  
 7 Dr Ludlow or Dr Armstrong or, indeed, Usman Khan, about  
 8 these concerns of PS Forsyth?  
 9 A. No.  
 10 Q. Now, finally, just a few questions about the  
 11 arrangements for the event at Fishmongers' Hall. You  
 12 assisted, I think, in the logistical arrangements for  
 13 that event?  
 14 A. Yes. Yes.  
 15 Q. In setting it up? In your dealings with The  
 16 Fishmongers' Company, were any questions raised about  
 17 what sorts of people would be attending the event?  
 18 A. Not that I can remember. I can't -- I don't think  
 19 I'm the best person to answer that question because the  
 20 communications that we had were a little bit more basic,  
 21 you know, like lists and things, but that didn't  
 22 necessarily have what people did, so no, I don't know.  
 23 Q. It didn't come up as a topic?  
 24 A. Not with me.  
 25 Q. Now, Usman Khan was invited to that event

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1 in October 2019. Do you remember that you received  
 2 a call from him expressing concern about how he would  
 3 get to the event?  
 4 A. Yes.  
 5 Q. And can you tell us about that call? What he said in  
 6 that call and how you responded?  
 7 A. Yes, he said: you've got to remember, Lisa, you know,  
 8 I've been in a high security prison for a long time and  
 9 it's, you know, quite scary to come to London, I've not  
 10 been there for a long time, I don't know what it's like.  
 11 So I said -- well, I don't know what I said to that,  
 12 but that's what I remember him saying. And so Amy came  
 13 into the office again at some point after, and I said to  
 14 Amy: Amy, Usman's quite anxious about coming into  
 15 London, can we get him to get a taxi from Euston, and  
 16 she said: oh, he'll just have to deal with it like  
 17 everyone else, which was, I guess, a fair ... I don't  
 18 know. Anyway, so yes, so that was what she said, so  
 19 then I texted him saying: I'm sorry, you're going to  
 20 have to get a tube, I think, or something like that.  
 21 Yes.  
 22 MR HOUGH: And the jury have heard about how it was  
 23 arranged, then, for him to travel by train and be met by  
 24 Mr Larmour.  
 25 Ms Ghiggini, you, as we've heard from others,

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1 attended the event and were caught up in the midst of  
 2 things. Because we've heard about what happened to you,  
 3 and a great deal about the detail of the attack, I'm not  
 4 going to ask you questions about that. It may be that  
 5 others will. Thank you very much for your evidence.  
 6 A. Okay. Thank you.  
 7 JUDGE LUCRAFT: Mr Pitchers.  
 8 Questions by MR PITCHERS QC  
 9 MR PITCHERS: Yes, Ms Ghiggini, I ask questions on behalf of  
 10 the family of Saskia Jones. Just a few things, just to  
 11 pick up on some of the matters that were in your witness  
 12 statement.  
 13 You have told us that you had telephone  
 14 conversations with Khan, and at the moment I'm talking  
 15 about those conversations that were before the summer  
 16 when it seems that things went quiet and, as  
 17 I understand it from reading your statement, the thing  
 18 he spoke about most was his time in prison?  
 19 A. Yes, I think every conversation would come back to when  
 20 he was in prison, when he was -- sometimes he would talk  
 21 about when he was in the segregation, which was,  
 22 I think, six months, but this is all from what he told  
 23 me. Yes, he would tell me stories about that, and then  
 24 sometimes he would tell me about the CSC unit he was in,  
 25 and people like Charles Bronson that he was with. So,

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1 you know, he was a bit...  
 2 Q. And as I understand it, you formed the impression that  
 3 he had been traumatised by his time in prison?  
 4 A. I formed the -- yes. Obviously I'm no expert.  
 5 Q. No.  
 6 A. I'm an administrator, but yes, I did -- I got the  
 7 impression that, you know, especially having been  
 8 through trauma recently, you know, you sort of get stuck  
 9 don't you, on certain things. But that was just  
 10 a non-expert opinion.  
 11 Q. A non-expert view?  
 12 A. Yes.  
 13 Q. And I think you also formed the impression that he was  
 14 rather lonely and isolated and wanted someone to talk  
 15 to?  
 16 A. Yes, I think I formed that impression also because of  
 17 the restrictions that were on him, I guess like inside  
 18 the prison he had been quite -- I don't know, I got the  
 19 impression that he had been quite isolated in prison  
 20 from the way that he talked, I don't know -- you know,  
 21 and then outside of prison he had quite a lot of  
 22 restrictions on him. So, yes.  
 23 Q. You have mentioned Charles Bronson, and just so we're  
 24 clear, I think there are perhaps two Charles Bronsons  
 25 that have some public presence. One of them, a movie

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1 star, but we're not talking about that one, are we?  
 2 A. No.  
 3 Q. There's another that goes by that name. He's a rather  
 4 notorious prisoner, we don't need to go into detail  
 5 about it. From your statement, I understand that Khan  
 6 had told you that Bronson had said to him words to the  
 7 effect of, "If you're going to do something, just do  
 8 it".  
 9 A. Yes, "Just do it big", or something like that, yes.  
 10 Q. I'm not suggest you should have realised the  
 11 significance of that at that stage.  
 12 A. Absolutely. Of course.  
 13 Q. When was it, doing the best you can, that you remember  
 14 Khan reporting that to you?  
 15 A. I think it was in the two weeks before the attack that  
 16 he said it. He had mentioned Khan -- he had mentioned  
 17 Bronson before a lot of times, but it was the first time  
 18 that he'd sort of quoted him in that way.  
 19 Q. Yes. In your statement you touch on his engagement with  
 20 creative writing, and, again, your impression, having  
 21 had this contact with him, was that he didn't seem to be  
 22 engaging with his writing after he was released from  
 23 prison?  
 24 A. Yes, it didn't seem to be that way, because he had,  
 25 I think, like -- you know, I think what happened was,

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1 like Ruth said to him: type up the -- or maybe she told  
 2 me to tell him type up his essay he'd written, and there  
 3 wasn't any sort of comeback on that, I don't -- but that  
 4 was the impression I got. Again, I don't know what  
 5 he was doing really.  
 6 Q. It seems that you were slightly surprised by that given  
 7 he had seemed more interested in the creative writing  
 8 whilst he was in prison?  
 9 A. Yes.  
 10 Q. And from what you could see, the interest seemed to drop  
 11 off after he was released?  
 12 A. Yes, I mean -- you know, I guess like in my head  
 13 I thought -- you know, I wondered if that was some sort  
 14 of family thing where there was an expectation to get  
 15 a certain job. But, you know, again, it's just me  
 16 speculating.  
 17 Q. And is that why in the statement you explain that,  
 18 unlike other students, he hadn't done anything to take  
 19 up any educational opportunities after his release from  
 20 prison?  
 21 A. Yes.  
 22 Q. He hadn't enrolled on any courses?  
 23 A. Yes. Yes. But at the same time I don't know what  
 24 restrictions he had, so I don't know if he tried to take  
 25 up other education opportunities like going to

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1 university, because I think he had some sort of interest  
 2 in that but I don't know if he was allowed to or did.  
 3 Anyway.  
 4 Q. And, as I understand it, you were surprised when  
 5 he arrived at the event at Fishmongers' Hall without any  
 6 sort of police escort?  
 7 A. I wasn't surprised then, because I knew that he wasn't  
 8 coming with a police escort already. I was -- I think  
 9 there is an email that I wrote where it says: oh,  
 10 Usman's coming to the event, and then I just put that on  
 11 his own. So I guess in that email, I think looking back  
 12 at it I must have been, like: oh that's, you know, like  
 13 kind of a little bit, you know, slightly jarring,  
 14 I guess. But again, I wasn't an expert, I didn't --  
 15 I just thought -- you know, I thought people were --  
 16 Q. No, and it wasn't your responsibility to ask.  
 17 A. No, of course not.  
 18 Q. So you weren't surprised on the day because you weren't  
 19 expecting him to be escorted?  
 20 A. No.  
 21 Q. But perhaps at some earlier point when you realised  
 22 he wasn't going to be escorted, at that point you felt  
 23 rather surprised?  
 24 A. Yes, just slightly surprised that -- yes, I did feel  
 25 surprised.

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1 Q. And in your role in administration, presumably you had  
 2 some involvement in sending and receiving invitations  
 3 for the event at Fishmongers' Hall?  
 4 A. Yes, I did.  
 5 Q. And am I right that the Lord Chancellor was invited to  
 6 attend the Fishmongers' Hall event?  
 7 A. Oh, I think that would have maybe been dealt with by  
 8 Ruth and Amy because it might have been a different  
 9 invite that they would have sent him.  
 10 Q. There is -- this is the last topic, and I can do it  
 11 briefly, {DC6384/353}.  
 12 A. Yes.  
 13 Q. And I think if we scroll down, we'll see there what  
 14 would seem to be an email sent from an Alex Roberts,  
 15 23 October 2019, which would suggest that he was  
 16 responding on behalf of the Lord Chancellor confirming  
 17 he would be unable to make this event?  
 18 A. Yes.  
 19 Q. So that would be rather an odd email to send if  
 20 he hadn't been invited.  
 21 So this is a fairly obvious point: if he had  
 22 accepted that invitation, one would have expected the  
 23 Lord Chancellor to have been present on 29 November?  
 24 A. Yes.  
 25 MR PITCHERS: Thank you. I have no further questions.

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1 A. Okay, thanks.  
 2 JUDGE LUCRAFT: Thank you, Mr Pitchers.  
 3 Questions by MR ARMSTRONG  
 4 MR ARMSTRONG: Ms Ghiggini, my name is Nick Armstrong,  
 5 I'm asking you questions on behalf of Jack's family,  
 6 I'm really not going to keep you very long.  
 7 A. Okay.  
 8 Q. You're having these conversations with Usman Khan,  
 9 they're slightly informal. Are you given any guidance  
 10 about reporting, when to report, what thresholds, what  
 11 to be worried about?  
 12 A. No.  
 13 Q. Are you given any guidance about how to police personal  
 14 boundaries, and are you told don't get too close?  
 15 A. No.  
 16 Q. You had some fairly dark exchanges with him; is that  
 17 fair?  
 18 A. Yes.  
 19 Q. You managed to have some exchanges with him about  
 20 poetry, amongst other things?  
 21 A. Mm—hm.  
 22 Q. Including his.  
 23 A. Yes.  
 24 Q. I just want to ask you a question — I'm not going to  
 25 ask you about TS Eliot and those sorts of matters, dark

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1 poem though that may be. But there was one where  
 2 he raised an issue with his, so he gave you his poem  
 3 that we've heard on the video, which is about a flower  
 4 blooming in winter.  
 5 A. Oh yes.  
 6 Q. And you raised a question with Jack about that.  
 7 A. Yes. That was before he came out of prison. That was  
 8 before I knew him.  
 9 Q. Okay. Do you remember when? I know it's 2018?  
 10 A. I do, it was just after the alumni event, I think, which  
 11 was the September alumni event, I think we had it in,  
 12 I can't quite remember the date, but it would have  
 13 been September or October — I think it's September 2018  
 14 and I think he had written something for it, so I was  
 15 making a quite bad video and was sort of typing it up  
 16 and I just sort of said to Jack, kind of half joking but  
 17 half sort of serious, I was like: you know, flowers  
 18 don't bloom in winter, and it just sounded a bit...  
 19 Q. It sounded a bit dark?  
 20 A. Yes, it sounded ... yes.  
 21 Q. Well, I'm actually interested — and I suspect I know  
 22 the answer to this but I'm interested in exactly what  
 23 Jack says, because you report in your witness statement,  
 24 you raise the question of whether a flower blooming in  
 25 winter is a bomb. That's the issue that you tell us

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1 that you're concerned about, and Jack says to you:  
 2 absolutely not, Khan has been de—radicalised and he has  
 3 been de—radicalised by somebody called Choudary, do you  
 4 remember that?  
 5 A. I mean he didn't say "absolutely not", he said: oh no,  
 6 like, you know, but yes, he said that.  
 7 Q. So he says: no, no, no, and he uses the word  
 8 de—radicalised?  
 9 A. Yes, he says he has been de—radicalised by whatever his  
 10 name is Choudary.  
 11 Q. You see, the reason why that just strikes a bit of  
 12 a chord with some of us in the room is because, first,  
 13 de—radicalisation is an intensive process and, as you  
 14 can probably tell by events, he had not been through it.  
 15 Equally, however, the reference to Choudary, he had  
 16 a co—defendant from his original offence called  
 17 Choudary, and there was a hate preacher who influenced  
 18 him called Choudary. Are you sure — neither of them  
 19 seem likely candidates for de—radicalisation.  
 20 A. You know, that's what Jack said, he said it was someone  
 21 beginning with A, Ansem Choudary, and he said that's  
 22 what someone had told him.  
 23 Q. All right.  
 24 A. So that's what he said, so I was like: right, okay,  
 25 fine. That was the conversation that I remember.

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1 Q. As I say, I think I — you don't know where Jack got  
 2 that?  
 3 A. Sorry?  
 4 Q. You don't know who told Jack that?  
 5 A. I do.  
 6 Q. You do?  
 7 A. Yes. Well, he said that Lorna had told him that.  
 8 Q. Oh, so Usman told him that he'd been —  
 9 A. No, Lorna.  
 10 Q. I'm sorry?  
 11 A. Someone called Lorna. Lorna Hackett had said that to  
 12 Jack, apparently.  
 13 Q. And who is that?  
 14 A. Just someone that — she's someone that — she's  
 15 a lawyer.  
 16 Q. Right. I see. Lorna Hackett. All right, that's all  
 17 I wanted to know. And that's all Jack said about it?  
 18 A. Yes, and, you know, I just — you know, that's what  
 19 he said, it was hearsay, and... Yes.  
 20 Q. Okay, no, that's fine, I understand it's hearsay, I just  
 21 wanted to see if we could get any further on it.  
 22 Thank you very much. I'm very sorry to have kept  
 23 you on a Friday afternoon.  
 24 A. Thank you.  
 25 JUDGE LUCRAFT: Thank you.

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1 Well, I think, Mr Hough, that brings us in slightly  
 2 shorter where we said we would finish.  
 3 MR HOUGH: Thank you very much, Ms Ghiggini.  
 4 A. Thank you.  
 5 JUDGE LUCRAFT: And again, my apologies you have been kept  
 6 waiting but at least we have concluded you today, so  
 7 thank you very much for doing that.  
 8 Mr Hough, we will all part company there. Just  
 9 before we do, ladies and gentlemen, can I, at the risk  
 10 of sounding like a cracked record, say what I said last  
 11 time we broke over a weekend: you've been listening to  
 12 some very different evidence particularly in the last  
 13 few days, and I have noted that you have been following  
 14 it very closely, a number of you have made, from what  
 15 I can see, making notes in your notebooks. But can  
 16 I just remind you of my rather bad analogy of just  
 17 pressing a pause button and getting about whatever you  
 18 would normally do at a weekend. It's very important we  
 19 all take a break, we come back on Monday refreshed, so  
 20 that we can then look at the evidence we're going to  
 21 hear next week.  
 22 So thank you very much, your timekeeping has been  
 23 absolutely impeccable, that is fantastic, thank you very  
 24 much. We will resume on Monday morning at 10 o'clock,  
 25 and I wish you all a pleasant, restful weekend.

1 Thank you.  
 2 (In the absence of the jury)  
 3 MR HOUGH: Sir, may I detain you for a minute longer.  
 4 I won't make a particular apology about delaying lawyers  
 5 for a minute longer.  
 6 With everyone's assistance, we have concluded the  
 7 evidence for this week timetabled, subject to the point  
 8 that Eleanor Brown and Jenny Fogarty, who were scheduled  
 9 to be called today, have not been called. They were  
 10 not. They were actually dewarned last night.  
 11 JUDGE LUCRAFT: Yes.  
 12 MR HOUGH: We have proposed that they not be called and that  
 13 any evidence from their statements which interested  
 14 persons wish to be adduced be read either under Rule 23  
 15 or as admissions.  
 16 We understand that Mr Griffin from the  
 17 University of Cambridge will be making some suggestions  
 18 from some excerpts of those two statements to be read.  
 19 Those will be — those suggestions will be circulated,  
 20 and we hope that some agreement can be reached in that  
 21 regard.  
 22 As to Monday of next week, we shall certainly be  
 23 hearing from Commodore Williamson and Dr Fegan—Earl, and  
 24 we will be reading the evidence of Dr Cirimele.  
 25 We'll make a decision this evening as to whether

1 Superintendent Robinson should be brought to court that  
 2 day.  
 3 JUDGE LUCRAFT: Yes.  
 4 MR HOUGH: Or whether he might be put off to a later stage  
 5 of the Inquests.  
 6 JUDGE LUCRAFT: Thank you very much indeed for the update.  
 7 We'll sit again on Monday at 10 o'clock. Thank you  
 8 all.  
 9 (4.58 pm)  
 10 (The court adjourned until 10.00 am on  
 11 Monday, 26 April 2021)  
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