

# OPUS2

Fishmongers' Hall Inquests

Day 14

April 30, 2021

Opus 2 - Official Court Reporters

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Friday, 30 April 2021

(9.30 am)

(In the absence of the jury)

JUDGE LUCRAFT: Mr Hough, just whilst the jury are coming in. We've got quite a busy morning but I hope as Mr Moss went round and got some time estimates, people will do their very best to stick to them, but we will take a break mid-morning at a convenient stage.

MR HOUGH: Yes, sir.

(In the presence of the jury)

JUDGE LUCRAFT: Good morning, ladies and gentlemen. Nice to see you all.

Mrs Boulton, good morning to you, and over to you, Mr Rule.

MS JOANNA BOULTON (continued)

Questions by MR RULE

MR RULE: Ms Boulton, my name is Philip Rule and I ask questions on behalf of Saskia Jones' family.

You dealt yesterday with your experience and I don't want to go back into that, and we recognise the lack of experience you had had in certain respects to do with matters that come up in this case, but could I just ask you about your more usual role, your more usual function inside the prison. Did that involve sentence planning?

A. Yes, it did.

1

Q. By which you would have people on your caseload who you would be sequencing for interventions for courses, education, things like that?

A. Yes, that's right.

Q. And in a category A prison where most of the offenders are at the start of a sentence progression and they will move through the system later on in other places, there's a significant amount of your time will be spent on that element of the sentence, won't it?

A. Yes.

Q. And for that you're trying to motivate prisoners?

A. Absolutely, yes.

Q. And your job is to encourage good behaviour?

A. Yes.

Q. Engagement?

A. Yes.

Q. And to try and build a rapport, I would imagine, with the prisoners?

A. Yes.

Q. So you are there as an individual who is supposed to take an interest in them, to build relations, and to use that to help them to rehabilitate themselves?

A. That's correct.

Q. And that's a large part of your daily mindset, isn't it?

A. Yes.

2

Q. That's what you're about?

A. Yes.

Q. Now, I turn to Mr Khan. You took over in November 2016. Do you recall now -- and I appreciate time has moved on -- but do you recall now that when you would have taken over his case you would have seen that he had been conducting certain educational courses?

A. Yes, I believe when I took over he had started GCSEs.

Q. And he had also already completed in February 2016, an award for living in a diverse society?

A. I don't recall that, sorry.

Q. I won't take you to it, there is a certificate that we have, but you were aware he had some education in doing that?

A. He had done some education.

Q. And my other question about that is, you were aware, no doubt, that the system means that if you do these courses you are paid to do them?

A. Yes, you are.

Q. So there is an advantage to a prisoner signing up to these, incentivising them?

A. Absolutely.

Q. And some may sign up for good reasons?

A. Yes.

Q. And others may sign up for --

3

A. For financial reasons, yes.

Q. Now, Mr Khan and your discussions with him, we've been through certain detail with other witnesses and I don't want to belabour points, all right, but can I take it in a general way, he explained to you his claim about his childhood experiences that had shaped his offending behaviour?

A. He spoke about an attack on one of his friends, and also spending time in Pakistan.

Q. Yes, I think there may have been a teacher being racist to him?

A. There was a teacher, yes, that's right.

Q. And various other things.

Now, the point about all of that, the jury will understand as I do that we have been through that in some detail, so I would just take this point, really --

A. Yes.

Q. -- you personally and your service within the prison, you were not able to investigate the truth of what prisoners told you about their childhood or background?

A. Only what he tells me, but no, I wouldn't have investigated it further.

Q. Thank you. So the information that feeds into the system which you're involved in directly will have come from the prisoner, from Mr Khan.

4

1 A. Yes.  
 2 Q. Now, one of the things that you told us about yesterday,  
 3 I think, is intelligence can be used to challenge  
 4 a prisoner.  
 5 A. Yes.  
 6 Q. Now that means, doesn't it, that part of your role,  
 7 building this relationship with the prisoner, might be  
 8 if you receive intelligence that it's not  
 9 non-disclosable, that you are able to use, so it's not  
 10 so secret that you're not able to bring it up with the  
 11 prisoner --  
 12 A. Sure.  
 13 Q. -- but you have a piece of information, you're able to  
 14 confront the prisoner with it in a conversation?  
 15 A. Yes.  
 16 Q. And you would take their -- they would have the  
 17 opportunity to comment on it with you, you would have  
 18 the opportunity to make any points about it with them?  
 19 A. Yes.  
 20 Q. Now, is this essentially the position with Mr Khan --  
 21 I appreciate you are dealing with him for two years or  
 22 so -- but the position is, if you ever brought up any  
 23 piece of intelligence with him, he denied it and  
 24 discredited it?  
 25 A. Generally, yes.

5

1 Q. Can you think of a single example where he admitted what  
 2 had been said about him?  
 3 A. Not in terms of -- well, the taqiyya, he was very  
 4 unhappy about, the accusations of radicalisation, he was  
 5 very unhappy about, he acknowledged some of the poor  
 6 behaviour, jumping on the netting is something that he  
 7 shouldn't have done, but in terms of the taqiyya and the  
 8 radicalisation, he was always adamant he was never  
 9 involved in that.  
 10 Q. So if I leave aside the things where 50 prisoners and  
 11 staff have seen you doing it because you were shouting  
 12 at the top of your lungs for 30 minutes, walking  
 13 dangerously across netting --  
 14 A. Yes.  
 15 Q. -- other things which were, without him knowing whether  
 16 he had been seen or not seen, he denied it?  
 17 A. Denied it, yes.  
 18 Q. That was his default position?  
 19 A. Yes.  
 20 Q. Denied, minimised, and criticised, said: oh, it's  
 21 worthless, valueless; tried to negate the intelligence?  
 22 A. He would minimise it and try and give a different  
 23 explanation.  
 24 Q. You've given various examples of that in your witness  
 25 statement but we can deal with it in a generality, and

6

1 I'm grateful.  
 2 A. Okay.  
 3 Q. So one example of that is in July 2017, you were asked  
 4 to investigate with him his intentions regarding  
 5 Pakistan?  
 6 A. Yes.  
 7 Q. And he dismissed that, didn't he?  
 8 A. Yes, he did.  
 9 Q. So he denied any intentions that he would like to live  
 10 in Shari'a law --  
 11 A. That's right.  
 12 Q. -- or in a country other than the UK, et cetera.  
 13 You would later become aware, I think, through the  
 14 processes in 2018, that he was having conversations with  
 15 his mother about that?  
 16 A. Yes.  
 17 Q. So inconsistent? What he's told you could well be  
 18 a lie; what we're seeing is, converse, a recorded  
 19 transcript that tells you something different than what  
 20 he tells you when you ask him?  
 21 A. Yes.  
 22 Q. Now although he denied every single piece of  
 23 intelligence so far as we gather, unless it was the  
 24 NOMIS entries that relate to what was seen on the wing  
 25 in terms of netting, et cetera, nonetheless there was,

7

1 you would accept, wouldn't you, a pattern of  
 2 intelligence?  
 3 A. Yes, there was a pattern.  
 4 Q. And it was a strong pattern? It didn't go in different  
 5 directions but it was a pretty consistent theme through  
 6 different prisons, through different wings, through  
 7 different spurs of intelligence coming forward from  
 8 different sources that this is somebody involved in the  
 9 extremist side of gang culture in the prison?  
 10 A. Yes.  
 11 Q. And that pattern was clear over many, many years?  
 12 A. It was from the beginning, I understand, of his prison  
 13 sentence.  
 14 Q. Now, you mentioned yesterday that there was a meeting,  
 15 you were taken to the point of the meeting on 19 April  
 16 at which you were present, where he was challenging the  
 17 intelligence that was behind or part of the ERG that had  
 18 been conducted by Ieva, and I am using her first name  
 19 for good reason.  
 20 A. Yes.  
 21 Q. You know who I mean?  
 22 A. Yes.  
 23 Q. So that's appendix 6 to that document, and we have  
 24 a reference to it, but I don't need to take you to it,  
 25 but within there we'll also find reference to Mr Machin

8

1 explaining the pattern --  
 2 A. Yes.  
 3 Q. -- in answer to Usman Khan and really saying it doesn't  
 4 wash when there's this much info about you?  
 5 A. Yes.  
 6 Q. Another example of him denying things is in November  
 7 2017, and the jury have heard about different years when  
 8 this happens, but the 11/11 month -- 11 November 2017 he  
 9 once again disrupted the two-minute Armistice silence?  
 10 A. Yes, and he gave an explanation of he was talking on the  
 11 telephone, so he minimised, yes.  
 12 Q. This is the point I wanted to raise with you, thank you.  
 13 So he told you: it 's because I was on the phone  
 14 actually?  
 15 A. That's what he told us, yes.  
 16 Q. But you will remember, I'm sure, in the record itself  
 17 the officer has written that he and another prisoner  
 18 were shouting and afterwards he went on the phone. So  
 19 the information coming from the records suggested he's  
 20 deliberately disrupting something in November 2017 --  
 21 A. Yes.  
 22 Q. -- consistent with his behaviour throughout, and we can  
 23 go back to 2012, I think, for an example of that, but  
 24 when he is confronted again, he is lying, he is  
 25 minimising: oh no, I was just on the phone.

1 A. Yes.  
 2 Q. You reported, and you were shown this yesterday with  
 3 Mr Hough, you reported for the category A dossier in  
 4 late 2017. Your report was 13 September. We saw your  
 5 conclusion, you were not able to recommend a downgrade,  
 6 and the Category A Team agreed subsequently, and the  
 7 local advisory panel had recommended at the prison and  
 8 by December 2017 we have the decision that he has made  
 9 no substantial progress?  
 10 A. Yes.  
 11 Q. And again, we have seen that document, I'm not going to  
 12 ask you to look at it, I know you will be familiar.  
 13 By 2018, late 2018, you've explained to us that the  
 14 new review is coming up, you're providing a report, and  
 15 this time the thinking really is that we're very  
 16 proximate to his release, he's going out in December?  
 17 A. He's going out whatever, yes.  
 18 Q. You know how long these processes take?  
 19 A. Yes.  
 20 Q. A review that's taking place late 2018 is going to have  
 21 no effect?  
 22 A. No, absolutely.  
 23 Q. So on that basis, we're able to give him a little bit of  
 24 encouragement again, putting your hat on as the  
 25 encouraging relationship-builder?

1 A. Yes.  
 2 Q. May I just be clear about your role in the prison system  
 3 providing information in these types of reports on risk  
 4 assessment.  
 5 Your report, and we can look at it if you want, but  
 6 I think you can, again, help me with the general point,  
 7 yours doesn't include the security intelligence?  
 8 A. No, it doesn't.  
 9 Q. That's not your job?  
 10 A. No.  
 11 Q. There is an entirely separate report from the security  
 12 or the counter-terrorist unit provided to the category A  
 13 dossier?  
 14 A. Yes.  
 15 Q. Along with the psychologist's one?  
 16 A. Yes.  
 17 Q. But you're fulfilling one particular function and your  
 18 focus with those reports is how is he behaving in terms  
 19 of education, how is he behaving to you, is he saying  
 20 things that are encouraging to you, is he disengaged,  
 21 has he been rude, things like that, that you're aware  
 22 of?  
 23 A. Yes, and also about his sentence plan, is he working  
 24 towards the objectives that we've set?  
 25 Q. Thank you.

1 Now, so far as, then, security and intelligence is  
 2 concerned, you are involved in meetings that take place  
 3 in order to bring people up to date with what you can  
 4 input?  
 5 A. Yes.  
 6 Q. But you're aware that somebody else is keeping  
 7 a security record, somebody else is dealing with the  
 8 analysis of security?  
 9 A. Yes.  
 10 Q. And that's your role so far as the reports during  
 11 somebody's time in Whitemoor are concerned?  
 12 A. Yes.  
 13 Q. There's always security as another department --  
 14 A. There's a separate department that provides that  
 15 information.  
 16 Q. Thank you. All right, I'm going to ask us to look at  
 17 one document, please, which is the high risk  
 18 classification, the ERC decision of 14 August 2018, so  
 19 this is towards the end, still, of his sentence at  
 20 Whitemoor. This is {DC5353/1}, please.  
 21 So as late as August 2018, we have a review coming  
 22 for the high escape risk element of his category status:  
 23 "The panel were encouraged that you have shown  
 24 a willingness to engage in education and offending  
 25 behaviour work, however, you are yet to demonstrate

1 a reduction in risk ."

2 And if we carry on down the page:

3 "It was noted that there are concerning reports with

4 regards to your behaviour and promoting your extreme

5 interpretation of Islam. This demonstrates the ethos

6 that underpinned your offence remain.

7 "It was concluded that the nature of your offending

8 together with the lack of risk reduction work means that

9 high escape risk remains appropriate."

10 So that's an assessment which you wouldn't disagree

11 with in any way, would you?

12 A. No.

13 Q. That's 14 August 2018. Could I just invite the jury,

14 and I promise, sir, it's only one reference I make to

15 this document today, but the document which is our

16 {DC7534/1} for the screen, it is the chronology the jury

17 have of the security intelligence material. So if

18 everyone would be kind enough to go to {DC7534/8}, thank

19 you very much. Now, I gave the date of the ERC

20 decision, that was 14 August, and we can see bottom left

21 there's an entry that bears the same date on a different

22 matter.

23 Now, your witness statement refers to "Overt

24 behaviour having improved over time", but you left

25 expressly open, didn't you, the question of internal

1 change?

2 A. Yes.

3 Q. So while outwardly you are seeing some improvements --

4 A. Yes.

5 Q. -- there's no way of knowing at this stage whether that

6 is actually genuine or embedded?

7 A. Absolutely.

8 Q. And we have an entry there about Mr Khan at the bottom

9 of that page, 14 August, concerning him and another high

10 risk category -- TACT offender, rather, as if they're

11 putting on trial another inmate, and then there's some

12 prayer at the end of that process. So that's something

13 he's involved in, seen with CCTV in August 2018. And

14 again, that goes with the point that you have already

15 accepted, there may be outward behaviour he knows is on

16 display?

17 A. Yes, overt.

18 Q. And then there's other behaviour that's picked up?

19 A. Yes.

20 Q. Could I ask you about Way Out TV, and I'll do that with

21 a reference to a document that comes up, please. If we

22 could have {DC6489/48}, please. Bottom of the page,

23 please. So this is someone within the Prison Service,

24 Karen Molloy, and what we have in this email is:

25 "Do you have an email address for the above please

1 as we have a prisoner being released at the end of the

2 year to the West Midlands who would like to do some work

3 assisting ex-offenders. He has a powerful story to tell

4 about how education has changed his life and is willing

5 to record something for Way Out TV..."

6 And there's another reference to the documents to

7 that interest from Way Out TV.

8 A. Yes.

9 Q. Now, so far as that entry is concerned, he has not yet,

10 this is October 2018, spent any time outside high

11 security prison or, in fact, high risk within it.

12 A. Yes.

13 Q. So the idea that he has changed his life, that is coming

14 entirely from him, isn't it?

15 A. Yes, it would be.

16 Q. That's his claim which someone within the Prison Service

17 responsible for Way Out TV providing documentation by

18 television means of good success stories, he is being

19 taken at his word as a success story in October 2018

20 within the prison system.

21 A. Yes.

22 Q. Thank you.

23 Now, your reports we talked about for the category A

24 process, not incorporating intelligence, and in fact you

25 didn't have to see the intelligence report before your

1 report was written, just separate?

2 A. Yes.

3 Q. Does your role change, and I appreciate the experience

4 with it, but from what you can tell us now, when you

5 begin to deal with MAPPA?

6 A. Does my role change?

7 Q. Yes, in terms of intelligence?

8 A. I get the intelligence that I -- I'm given a pack of

9 intelligence information that I would provide to MAPPA.

10 Q. Thank you. So it changes to the extent where before

11 it's somebody else's job to pass this on --

12 A. Yes.

13 Q. -- to whichever decision-making body is involved?

14 A. For category A, yes.

15 Q. And others within the prison, education activities,

16 et cetera?

17 A. Yes.

18 Q. On the other hand, once we get to the community

19 intelligence, the MAPPA planning, security drops out of

20 the picture, doesn't it?

21 A. They provide me the information which I then go on to

22 pass directly on to MAPPA.

23 Q. You get a written document which you copy and paste to

24 your MAPPA F?

25 A. Yes, which I copy and paste into my MAPPA F, and then in

1 Usman's case, Mr Machin attended a couple of MAPPA  
2 meetings with me.  
3 Q. Was that because you were unsure that you invited  
4 Mr Machin to assist with your role with intelligence and  
5 how to deal with it?  
6 A. Yes.  
7 Q. Because it was all very new to you and untested,  
8 untried.  
9 A. It was new to -- well, MAPPA wasn't new to me, but yes,  
10 a TACT case going out into the community, given at  
11 Whitemoor that we tend not to release, because I guess  
12 the usual length of sentence and the dangerousness of  
13 the people, and I guess they're indeterminate sentences,  
14 most of them, so we wouldn't ordinarily have a lot of  
15 MAPPA cases.  
16 Q. And so there's a pretty much unique concern in your mind  
17 about how you're going to manage this particular  
18 Mr Khan --  
19 A. Yes.  
20 Q. -- high risk TACT offender --  
21 A. He's a high risk --  
22 Q. -- direct release from Whitemoor?  
23 A. Absolutely.  
24 Q. So that's why Mr Machin, who is not minuted as  
25 attending, doesn't formally attend --

17

1 A. No.  
2 Q. -- but we know that he was (overspeaking) --  
3 A. But he was there in the room with me, yes.  
4 Q. He's there in the room with you. But in general terms,  
5 I think you're now aware that because security -- you  
6 become the middle person in that conduit of information?  
7 A. I share that, yes.  
8 Q. No longer is security directly inputting to the  
9 decision-making, but it goes via you?  
10 A. Yes.  
11 Q. So you're now wearing two hats, aren't you: one is build  
12 the relationship, encourage the prisoner, be positive?  
13 A. Yes.  
14 Q. The other is report the negatives?  
15 A. Yes.  
16 Q. Was that a particularly difficult thing to do, to wear  
17 both hats in that way?  
18 A. No, because you have to share both sides of the  
19 information. I guess the security information wasn't my  
20 information, so I'd share the security information. If  
21 any questions or queries came back, I wouldn't be able  
22 to necessarily answer them at that MAPPA meeting,  
23 I would go away and then come back with the information.  
24 Q. Because security has more information than you could  
25 ever have?

18

1 A. Security have much more information than I have any  
2 access to.  
3 Q. And we've heard about the frankness that can be given  
4 when it's not on documented form?  
5 A. Yes, yes.  
6 Q. So in the oral discussions there can be a definite  
7 impetus put or an emphasis put on concerns?  
8 A. Yes.  
9 Q. At the first MAPPA meeting, I don't want to look at the  
10 document, but we have seen that you were asked to look  
11 into his views on drugs.  
12 A. Yes.  
13 Q. And you did so?  
14 A. Yes.  
15 Q. And he claimed to have no issues with drugs?  
16 A. No issues. In fact, that I guess if people wanted to  
17 take drugs, that was their choice, that's what he said.  
18 Q. But from a personal point of view --  
19 A. But for personal --  
20 Q. -- he said: I'm not someone who would use drugs?  
21 A. He wouldn't use, no.  
22 Q. Was that the first time in June 2018 with the MAPPA  
23 request that you had had a discussion with him about  
24 drug use?  
25 A. Yes.

19

1 Q. And is that again because the function of your  
2 discussions with him had always been about education,  
3 engagement and those sorts of things --  
4 A. Yes.  
5 Q. -- rather than assessment of attitudes generally?  
6 A. Yes, although having said that, I can't remember when we  
7 did sentence planning, usually you would go through the  
8 main items on OASys, so there is one area which is, is  
9 drug misuse a problem, so it would be like a passing  
10 comment, it wouldn't be any detailed conversation with  
11 him.  
12 Q. Thank you. And we looked yesterday at some intelligence  
13 concerning Mr Sannoh, which I believe Usman Khan  
14 explained to you, didn't he, that he had moved away from  
15 Mr Sannoh and that element of the gang?  
16 A. Yes.  
17 Q. So that piece of information that he is moving away from  
18 Mr Sannoh and the gang, that's really him responding to  
19 the challenge about that?  
20 A. Yes.  
21 Q. If one goes back to the intelligence itself, however,  
22 he's not -- Mr Sannoh has come onto the particular spur  
23 on 19 July 2018 and is recorded in the Mercury, in the  
24 intelligence, as having upset the dynamics because he is  
25 another top dog?

20

1 A. He is.  
 2 Q. And the two top dogs are having arguments?  
 3 A. Yes.  
 4 Q. Within this very short time frame, there is some  
 5 disagreement and the only basis for Mr Khan saying that  
 6 that is him disengaging from the group really comes from  
 7 him saying that rather than the records?  
 8 A. Yes, as far as I'm aware, yes.  
 9 Q. Now, I come towards the end of my questions. Three  
 10 topics, please, to deal with: the first is his  
 11 intentions in relation to family and relationships as he  
 12 comes out. He needs to build relations -- rebuild  
 13 relations with his family, doesn't he?  
 14 A. Yes.  
 15 Q. Siblings, parents.  
 16 A. Yes.  
 17 Q. Because he has complained about that during your  
 18 discussions with him?  
 19 A. Yes.  
 20 Q. The restrictions have meant he hasn't had much  
 21 contact --  
 22 A. Not with his parents, yes.  
 23 Q. -- very few visits, et cetera. That is obviously  
 24 something he's going to have to deal with on release?  
 25 A. Yes.

21

1 Q. He also mentions to you an arranged marriage plan?  
 2 A. He did, yes.  
 3 Q. Firstly, did it strike you that that plan was consistent  
 4 with an unchanged ideology and preferred traditional,  
 5 very traditional, ultra traditional lifestyle?  
 6 A. Potentially.  
 7 Q. And were you aware that he had had no intimate  
 8 relationships with any significance in the background?  
 9 A. Yes, I was aware.  
 10 Q. There was a suggestion of a wife, but that was never  
 11 a real relationship?  
 12 A. Yes.  
 13 Q. Did you not think that it may be too soon for him to be  
 14 having these kind of expectations, that he would come  
 15 out and have an arranged marriage, enter a new  
 16 relationship, deal with the emotional strains,  
 17 disappointments, et cetera; were you concerned about  
 18 that?  
 19 A. I wasn't, no, at the time I wasn't concerned about that.  
 20 I thought maybe settling down and getting married would  
 21 be a good thing for him.  
 22 Q. All right. But the ultimate point is this: in relation  
 23 to polygraph testing, that is lie detectors, isn't it?  
 24 A. Yes, it is.  
 25 Q. Are you aware of that being used, that implement being

22

1 used for sex offenders since 2014?  
 2 A. I am aware it has been used.  
 3 Q. Is it used at Whitemoor, is there such a machine at  
 4 Whitemoor?  
 5 A. Not that I'm aware of.  
 6 Q. So this was your colleagues in the community and general  
 7 training rather than experience of Whitemoor?  
 8 A. Yes.  
 9 Q. All right, and that obviously, at the time, and there  
 10 are legislative reasons and other things about the  
 11 system that was in place, but at the time that we're  
 12 talking about Mr Khan --  
 13 A. Yes.  
 14 Q. -- there was no licence condition that added polygraph  
 15 testing, or...?  
 16 A. Not that I recall, no.  
 17 Q. And finally in relation to Learning Together, you've  
 18 referred to that as a protective factor in emails and  
 19 reports?  
 20 A. Yes.  
 21 Q. Did you appreciate that there were also some risks about  
 22 why he might be motivated to be involved with  
 23 Learning Together or because of its profile, et cetera?  
 24 A. No. No. He was really positive about working with --  
 25 he was very passionate about writing and, yes, the

23

1 Learning Together was a good thing for him at the time  
 2 when he was in prison.  
 3 Q. I appreciate he was very positive about it.  
 4 A. He was.  
 5 Q. Did it also, did you consider that it might also be  
 6 a risk factor?  
 7 A. No, I didn't.  
 8 MR RULE: Thank you very much.  
 9 JUDGE LUCRAFT: Thank you, Mr Rule.  
 10 MR RULE: I don't think I deserve a star, my apologies.  
 11 Questions by MR GRIFFIN  
 12 MR GRIFFIN: Mrs Boulton, my name is Nicholas Griffin and  
 13 I represent Cambridge University. There's just one area  
 14 that I would like to ask you about, and that relates to  
 15 the possibility of Usman Khan staying in contact with  
 16 Learning Together once he had completed his sentence at  
 17 Whitemoor.  
 18 A. Yes.  
 19 Q. What I would like to do is just look at four or five  
 20 documents with you, just to see what we learn from  
 21 those, if that's okay?  
 22 A. Of course.  
 23 Q. Can we go first, then, please, to {DC6489/36}. And just  
 24 expand the top. Can we see here an email from Gina  
 25 Butler, who we heard from yesterday, to yourself, and

24

1 Amy Ludlow of Learning Together, and also copying in  
 2 Ken Skelton, who was a probation officer?  
 3 A. Yes.  
 4 Q. And do we see the email says:  
 5 "Jo, thanks for sending on. Ken, nice to meet you."  
 6 And if we drop down to the third paragraph:  
 7 "We're very aware that Usman is due for release  
 8 shortly, and he has spoken with us about wanting to  
 9 upkeep his connections with Cambridge. Therefore,  
 10 I just wanted to put all key parties in contact so that  
 11 we can talk about ways of enabling, and therefore  
 12 supporting Usman with this."  
 13 So here we see approximately six months before he is  
 14 released contact concerning a possible ongoing  
 15 relationship with Learning Together after he leaves  
 16 prison?  
 17 A. Yes.  
 18 Q. Can we move on, please, to {DC6408/1}, and just the top  
 19 half, to see what this document is. So here we've moved  
 20 on a few months, it's 11 October, and can we see that  
 21 these are minutes of a MAPPA meeting?  
 22 A. Yes.  
 23 Q. Could we go now, please, to {DC6408/5}, at the bottom  
 24 half of page 5, and under "Prison", can you see that the  
 25 meeting received information from you that Khan is due

1 for conditional discharge on 24 December?  
 2 A. Yes.  
 3 Q. He has been selected to complete Hands on Probability,  
 4 Social Skills Reading Group and Study Skills Group, and  
 5 then he is keen to work with the Cambridge University  
 6 learning team or Amy Ludlow who he has the contact  
 7 details for, and who has been made aware of his  
 8 discharge. So the possibility of some form of ongoing  
 9 contact is being raised in the MAPPA meeting?  
 10 A. Yes.  
 11 Q. Can we move on, then, a few days to {DC5565/1}. Can we  
 12 expand the top? Thank you very much. Can we see here  
 13 a category A report for Usman Khan and local advisory  
 14 panel minutes and recommendations.  
 15 Just to get the date, can we go to the top half of  
 16 {DC5565/3}, please. Can we see that this is signed  
 17 22 November?  
 18 A. Yes.  
 19 Q. And back to the top half of the second page, please,  
 20 {DC5565/2}. Thank you. Can we see under "Protective  
 21 Factors", if we move down to the second half of that  
 22 paragraph:  
 23 "Mr Khan is also keen to improve his education and  
 24 is motivated to continue and has applied for a mentoring  
 25 role with the Learning Together team from the Cambridge

1 University. He is planning to maintain links with the  
 2 university team upon release in order to work with them  
 3 in the community."  
 4 And so do we see the same theme here in the context  
 5 of the category A report?  
 6 A. Yes.  
 7 Q. Can we move on, then, just a few more days, and go to  
 8 {DC6384/102}, the bottom half. Thank you. Would you  
 9 mind expanding just a little bit further up so we can  
 10 see the details of who this is from and to. Thank you.  
 11 Do we see that this is an email from you on 30 November  
 12 to Georgina Butler?  
 13 A. Yes.  
 14 Q. And can we see that you are saying that:  
 15 "Since Usman has been involved with  
 16 [Learning Together] there has been a huge change in his  
 17 behaviour and outlook, all for the better."  
 18 And can we see just sort of halfway through that  
 19 paragraph:  
 20 "Since completing the Writing Together course with  
 21 [Learning Together] and continuing to work with them he  
 22 is a very different person."  
 23 A. He was, yes.  
 24 Q. And then dropping down towards the end, can we see that:  
 25 "I believe that Usman's work with

1 [Learning Together] is a protective factor for him and  
 2 I hope that he will be able to continue his work with  
 3 them when he is released as this will help to keep him  
 4 busy and focus on something that he is really passionate  
 5 about."  
 6 A. Yes.  
 7 Q. And the last document I want to take you to, can we go  
 8 to {DC5634/20}. Now, can we just focus on the -- can  
 9 you expand the top there. That's perfect. Can we see  
 10 the second entry there is 6 December 2018? Do you see  
 11 the top left-hand corner we can see an entry, 6/12/2018  
 12 at 13.59?  
 13 A. Yes.  
 14 Q. What I want to do, I just wanted to fix that there so  
 15 you have an idea of what date we're talking about.  
 16 We'll come back to that.  
 17 Can we go to the next page, please, {DC5634/21} and  
 18 expand the bottom half. So this is the Delius record,  
 19 as I understand it?  
 20 A. Okay, yes.  
 21 Q. And do we see here at the bottom an email that starts:  
 22 "Hi Gina,  
 23 "Following our conversation this morning about Usman  
 24 maintaining contact with the Learning Together team from  
 25 Cambridge University as requested I have provided Ken's



1 contact details below. He is Usman's outside probation  
 2 officer and will be responsible for managing Usman in  
 3 the community."  
 4 So does that look like an email from you to  
 5 Gina Butler at the prison?  
 6 A. Yes.  
 7 Q. Thank you. Can we expand the top half now, please?  
 8 Thank you. Do we see here an email from Gina Butler?  
 9 A. Responding, yes, to my email.  
 10 Q. Responding:  
 11 "Jo, thanks for sending on. Ken, nice to meet you."  
 12 So Ken Skelton is part of this email too.  
 13 A. Yes.  
 14 Q. "I copy in my colleague Amy from Cambridge University."  
 15 Amy Ludlow?  
 16 A. Amy Ludlow, yes.  
 17 Q. And you say:  
 18 "We're very aware that Usman is due for release  
 19 shortly, and he has spoken with us about wanting to  
 20 upkeep his connections with Cambridge. Therefore,  
 21 I just wanted to put all key parties in contact so that  
 22 we can talk about ways of enabling, and therefore  
 23 supporting Usman with this."  
 24 Do the documents that we've looked at show us  
 25 a process of Usman Khan expressing an interest in

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1 maintaining contact with Learning Together when he  
 2 leaves prison?  
 3 A. Yes.  
 4 Q. With you and your colleagues considering that and  
 5 thinking that that's a good idea?  
 6 A. Yes.  
 7 Q. And you and Gina Butler and Ken Skelton beginning to  
 8 liaise about it in advance of Usman Khan leaving prison?  
 9 A. Yes.  
 10 MR GRIFFIN: Thank you. Those are my questions, thank you  
 11 very much.  
 12 JUDGE LUCRAFT: Ms Leek.  
 13 Questions by MS LEEK QC  
 14 MS LEEK: Thank you, sir.  
 15 Good morning, Ms Boulton. As you know I ask  
 16 questions on behalf of the Secretary of State for the  
 17 Home Department and the Ministry of Justice.  
 18 Ms Boulton, yesterday Mr Armstrong pointed out that  
 19 Usman Khan was your first TACT offender. I just want to  
 20 look a little at your experience prior to taking him on.  
 21 You completed your probation training in 2009?  
 22 A. Yes.  
 23 Q. And by the time you became Usman Khan's probation  
 24 supervisor in 2016, you already had seven years'  
 25 experience --

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1 A. Yes.  
 2 Q. -- on top of degrees in social science and community  
 3 justice?  
 4 A. Yes.  
 5 Q. And your diploma in probation studies?  
 6 A. Yes.  
 7 Q. And during those seven years, you had worked with cases  
 8 in the community assessed as high risk of serious harm?  
 9 A. Yes.  
 10 Q. You had worked with MAPPA?  
 11 A. Yes.  
 12 Q. So you were well acquainted, in fact, with the  
 13 difficulties of dealing with dangerous offenders in the  
 14 community?  
 15 A. Yes.  
 16 Q. And you would know very well what the MAPPA panel would  
 17 be looking for when considering how to manage him in the  
 18 community?  
 19 A. Yes.  
 20 Q. On arrival at Whitemoor, you had a handover of around  
 21 two months with an experienced offender supervisor?  
 22 A. Yes.  
 23 Q. Who was moving back to work in the community?  
 24 A. Yes.  
 25 Q. And your role as an offender supervisor was to organise

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1 offence-focused interventions?  
 2 A. Yes.  
 3 Q. Which aimed to reduce the offender's risk and aid their  
 4 progression?  
 5 A. That's correct.  
 6 Q. In many ways not dissimilar from the kind of work that  
 7 you had already done?  
 8 A. That's right.  
 9 Q. And this essentially involved completing a range of  
 10 reports and attending a range of meetings?  
 11 A. Yes.  
 12 Q. And as an offender supervisor, you liaise with partners  
 13 within the prison and within the community?  
 14 A. Yes.  
 15 Q. Your role as an offender supervisor, you undertook the  
 16 Healthy Identity Intervention training?  
 17 A. I did, yes.  
 18 Q. The extreme risk guidance training?  
 19 A. Yes.  
 20 Q. And the identity matters training?  
 21 A. Yes, I did.  
 22 Q. Your line manager was a senior probation officer?  
 23 A. Yes.  
 24 Q. And if you had any questions or concerns about your  
 25 role, would you have been able to talk to her and then

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1 later it became a him?  
 2 A. Yes.  
 3 Q. I don't mean the her became a him, I mean first of all  
 4 you had a female line manager and then a male line  
 5 manager.  
 6 A. Yes, that's right.  
 7 JUDGE LUCRAFT: Both are possible, of course.  
 8 MS LEEK: Both are possible, indeed.  
 9 And you quickly gained experience of how to work  
 10 with and manage TACT offenders?  
 11 A. Yes, I did.  
 12 Q. Leading to becoming OMU TACT lead?  
 13 A. That's right, yes.  
 14 Q. In questioning you yesterday, Mr Armstrong made  
 15 suggestions to you about the nature and quality of some  
 16 of the interventions that Mr Khan received, such as the  
 17 Healthy Identity, et cetera?  
 18 A. Yes.  
 19 Q. But were these Prison Service approved courses?  
 20 A. Yes, they are.  
 21 Q. And validated by the Prison Service?  
 22 A. Yes.  
 23 Q. And did you have any reason to doubt their validity and  
 24 effectiveness?  
 25 A. No.

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1 Q. I want to ask you about the decision—making in the  
 2 management of offenders. This is, as we have heard,  
 3 a multi—disciplinary process?  
 4 A. Yes, it is.  
 5 Q. First by reference to Pathfinder; you were present at  
 6 Pathfinder meetings?  
 7 A. Yes.  
 8 Q. Where there was input, as we heard again yesterday, from  
 9 security?  
 10 A. Yes.  
 11 Q. Psychology?  
 12 A. Yes.  
 13 Q. And standing invites to counter—terrorism police?  
 14 A. That's correct.  
 15 Q. And the probation counter—terrorism lead sometimes —  
 16 A. Sometimes.  
 17 Q. — attended?  
 18 A. Yes.  
 19 Q. You don't make decisions alone?  
 20 A. No.  
 21 Q. So input from numerous disciplines when you decide  
 22 within the Offender Management Unit on action with TACT  
 23 offenders?  
 24 A. Yes.  
 25 Q. And in the case of Usman Khan, you also worked closely

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1 with Phil Bromley and then Ken Skelton who we will hear  
 2 from next week who were his offender managers within the  
 3 community?  
 4 A. Yes.  
 5 Q. With regard to the decision for Usman Khan to attend  
 6 Learning Together, again, this was not a decision you  
 7 made?  
 8 A. No.  
 9 Q. That was made with input from the Offender Management  
 10 Unit?  
 11 A. Yes.  
 12 Q. And we heard from Mr Machin that Usman Khan was cleared  
 13 by security and by him for attendance on the course?  
 14 A. Yes.  
 15 Q. I think it's fair to say that you had some awareness of  
 16 security from Pathfinder and the CT department?  
 17 A. Yes.  
 18 Q. But it was not your role to assess the risk from  
 19 a security perspective?  
 20 A. No, that's right.  
 21 Q. So far as MAPPA Fs are concerned —  
 22 A. Yes.  
 23 Q. — how did you go about pulling together material that  
 24 made its way onto the MAPPA F?  
 25 A. So I would contact the CT analysts to ask for

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1 information in relation to the security information.  
 2 They also provide me with information around  
 3 correspondence, telephone calls and visits, then I would  
 4 look at NOMIS, how his behaviour's been, I would look at  
 5 adjudications, I would then look at post—programme  
 6 reports, and also the ERG, and then my general knowledge  
 7 of Usman.  
 8 Q. Did you also speak to wing staff?  
 9 A. I would speak to wing staff to see who he his main  
 10 associations were.  
 11 Q. And did you speak to imams within the prison?  
 12 A. I did make contact with the imams.  
 13 Q. And did you also include the risk factors from the OASys  
 14 assessment and the warning signs from the 2018 ERG?  
 15 A. ERG, yes.  
 16 Q. Now, you've said that you had an update from CT  
 17 analysts, and we've seen the updates that you have  
 18 provided in four separate MAPPA Fs?  
 19 A. Yes.  
 20 Q. By the time of his release from prison, is it right that  
 21 the intelligence about what he planned to do on release  
 22 was that he planned to return to his old ways, believed  
 23 to be related to terrorism?  
 24 A. Yes.  
 25 Q. There was no mention in any of the CT material that you

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1 had of attack—planning?  
 2 A. No.  
 3 Q. I just want to be precise about that, because there was  
 4 some suggestion in questioning yesterday that you may  
 5 have been aware of something to do with attack—planning?  
 6 A. No.  
 7 Q. If you had had questions about the content of the CT  
 8 material, you could have gone back to the CT analysts?  
 9 A. The analysts or Mr Machin.  
 10 Q. And if the MAPPA panel had raised queries or wanted more  
 11 detail about the CT position, the intelligence position,  
 12 they could have asked you — asked the prison through  
 13 you or Mr Machin —  
 14 A. Yes.  
 15 Q. — to provide more detail?  
 16 A. Absolutely.  
 17 Q. And as we see when MAPPA asked you to look at the drug  
 18 position, you went back and researched that —  
 19 A. Yes.  
 20 Q. — through the prison?  
 21 A. Yes.  
 22 Q. Mr Armstrong suggested yesterday that one has to be  
 23 consistently vigilant, but, in fact, is your role  
 24 actually to present a fair and accurate picture to the  
 25 MAPPA panel?

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1 A. Yes.  
 2 Q. That includes an update on current behaviour?  
 3 A. Yes.  
 4 Q. And an update on the security position, the intelligence  
 5 picture?  
 6 A. Yes.  
 7 Q. And after that, is it a matter for MAPPA then to manage  
 8 his behaviour in the community?  
 9 A. Yes, it is.  
 10 Q. By reference to historic intelligence, but considering  
 11 his conduct and behaviour?  
 12 A. Yes.  
 13 Q. And is it very difficult to assess whether good  
 14 behaviour is genuine?  
 15 A. It is. You never, unless you're that person, you never  
 16 know.  
 17 Q. We've just heard about your role in connecting  
 18 Learning Together with Ken Skelton. You were well aware  
 19 of the negative behaviour of Usman Khan as well as the  
 20 positive behaviour —  
 21 A. Yes.  
 22 Q. — through your involvement with the 2018 ERG process?  
 23 A. Yes.  
 24 Q. And that was communicated with Ken Skelton —  
 25 A. Yes.

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1 Q. — who was aware of it —  
 2 A. Yes.  
 3 Q. — as were those dealing with him in the community. But  
 4 you were also aware of the overt positive behaviour?  
 5 A. Yes.  
 6 Q. The involvement with Learning Together?  
 7 A. Yes.  
 8 Q. Compliance with the sentence plan?  
 9 A. Yes, he did.  
 10 Q. Completion of Thinking Skills programme? Status on  
 11 enhanced IEP?  
 12 A. Yes.  
 13 Q. And removal from the Managing Challenging Behaviour  
 14 Strategy?  
 15 A. Yes.  
 16 Q. Previously Usman Khan had shown both negative  
 17 intelligence and negative overt behaviour?  
 18 A. Yes, he did.  
 19 Q. But by the time of his release, there had been  
 20 a sustained period of positive overt behaviour?  
 21 A. Yes, there was.  
 22 Q. And although one must always be aware of risk,  
 23 improvement in overt positive behaviour is not something  
 24 to be ignored?  
 25 A. Absolutely not.

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1 Q. Because this may be, or may demonstrate, the start of  
 2 rehabilitation?  
 3 A. The start of change, yes.  
 4 Q. And the start of change?  
 5 A. Yes.  
 6 Q. Because change has to start somewhere?  
 7 A. Absolutely.  
 8 Q. And was this in your mind when putting Mr Skelton into  
 9 contact with Ms Butler with regard to Learning Together?  
 10 A. Yes.  
 11 Q. And are protective factors in the community — you have  
 12 done an awful lot of work in the community, are  
 13 protective factors such as education and prosocial  
 14 activities incredibly important for the purpose of  
 15 reducing re—offending?  
 16 A. Yes, very important.  
 17 Q. And did you identify that if managed correctly,  
 18 Learning Together could be a significant protective  
 19 factor —  
 20 A. Yes.  
 21 Q. — in the community?  
 22 A. Yes.  
 23 Q. But at the same time were you aware, did you know, that  
 24 the MAPPA panel were aware of negative intelligence  
 25 because you prepared the MAPPA Fs?

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1 A. Yes.  
 2 Q. I'm just going to ask very briefly about your role in  
 3 the first couple of MAPPA meetings on the telephone.  
 4 A. Okay.  
 5 Q. Did you have any concerns ever that you weren't able to  
 6 get your point across over the telephone?  
 7 A. No.  
 8 MS LEEK: Thank you.  
 9 JUDGE LUCRAFT: Thank you very much.  
 10 Further questions by MR HOUGH QC  
 11 MR HOUGH: Ms Boulton, just a few points remaining from me,  
 12 first of all concerning the MAPPA meeting  
 13 of October 2018. May we have on screen, please,  
 14 {DC6408/5} and while that's being brought up, this is  
 15 concerned with the connection between Mr Khan and  
 16 another prisoner called Mr Sannoh.  
 17 A. Yes.  
 18 Q. And you will recall Mr Rule asked you some questions  
 19 about that.  
 20 You will recall it was suggested to you that Mr Khan  
 21 fell out with Mr Sannoh as one top dog bashing up  
 22 against another top dog?  
 23 A. Yes.  
 24 Q. Now, do you recall that when Mr Sannoh was moved onto  
 25 the wing, it was a disruptive influence?

1 A. I don't recall, but it would likely have been  
 2 a disruptive influence.  
 3 Q. And if you see in the top part of this page, about the  
 4 second main paragraph down, it was recorded initially  
 5 that Mr Khan associated with Mr Sannoh as one of his  
 6 principal associates?  
 7 A. Yes.  
 8 Q. And then over the page, please, to page 6, towards the  
 9 top of that page, {DC6408/6}, now do we see it's noted  
 10 that Khan lived in an area with surrounding gang  
 11 activity, appeared to be part of the group but acted  
 12 independently, mixed with a wider group, including some  
 13 enemies of the gang. Yes?  
 14 A. Yes.  
 15 Q. And that caused some friction between himself and  
 16 Sannoh, who is the group or gang influencer, and  
 17 Usman Khan regularly goes against him.  
 18 A. Yes.  
 19 Q. So I just want to press this, so far as you can recall.  
 20 Was the falling out because Usman Khan wanted to be top  
 21 dog, or was it because, as suggested here, Mr Sannoh was  
 22 unhappy about Usman Khan having other friends, friends  
 23 and associates, outside the group? Can you remember  
 24 which it was?  
 25 A. I honestly really can't remember, I'm sorry.

1 Q. But certainly in these minutes the suggestion is that  
 2 Mr Sannoh was put out by Khan having a wider group of  
 3 friends, including non-Muslim friends?  
 4 A. It's possible, yes.  
 5 Q. And if that was true, that would be a positive for  
 6 Mr Khan?  
 7 A. Absolutely.  
 8 Q. We can take that off screen.  
 9 Ms Leek asked you some questions about your prior  
 10 experience as an offender supervisor, and your ERG  
 11 training.  
 12 A. Yes.  
 13 Q. You have obviously, over the last few years, developed  
 14 experience in handling extremists as an offender  
 15 supervisor?  
 16 A. Yes.  
 17 Q. Have you detected differences in the way you need to  
 18 handle extremists, for example, in the fact that they  
 19 may have a fixed ideology which justifies them in, for  
 20 example, dishonest behaviour and other behaviour which  
 21 you might not see in quite the same way with other  
 22 offenders?  
 23 A. You still see dishonest behaviour in other offenders  
 24 too, lots of manipulation and similar behaviours.  
 25 Q. Now, I'm asking this as an entirely open question to you

1 as the criminal justice professional: have you noticed  
 2 a difference in the way you need to treat and handle  
 3 extremist terrorist offenders as against other serious  
 4 offenders?  
 5 A. They're all different. I treat all of them -- my people  
 6 on my caseload individually. It depends on their  
 7 characters. They're all treated differently.  
 8 Q. And then the old ways intelligence, Ms Leek asked you  
 9 about that as well, as did Mr Armstrong. Now, the  
 10 intelligence that came through in the Mercury  
 11 Intelligence record for 29 October 2018 said that Khan  
 12 had said that on release he was going to return to his  
 13 old ways, and that was understood or interpreted to  
 14 relate to terrorism; yes?  
 15 A. Yes.  
 16 Q. The intelligence in the MIR that fed through to the  
 17 MAPPA meetings did not say that Khan had specifically  
 18 attack-planning in mind?  
 19 A. Yes, that's right.  
 20 Q. Now, the jury may hear in due course about other  
 21 intelligence that came in to other people --  
 22 A. Okay.  
 23 Q. -- that did refer to attack-planning?  
 24 A. Okay.  
 25 Q. But that didn't come through to you?

1 A. I wasn't aware of any attack—planning.  
 2 Q. And is this right: Khan's background in terrorism was  
 3 not a background involving him personally planning and  
 4 participating in attacks?  
 5 A. Yes.  
 6 Q. So is this fair: a reference to him returning to old  
 7 ways might, for example, be a reference to him wanting  
 8 to travel to another country —  
 9 A. Yes.  
 10 Q. — Pakistan, or set up a training camp or, indeed,  
 11 proselytise, go on the da'wah stalls as he had before?  
 12 A. Yes.  
 13 MR HOUGH: Thank you very much, those are my questions.  
 14 JUDGE LUCRAFT: Thank you very much, Mrs Boulton, you are  
 15 free to go. Thank you very much.  
 16 MR HOUGH: The next witness is Mr Styles.  
 17 JUDGE LUCRAFT: Yes.  
 18 MR WILLIAM STYLES (sworn)  
 19 JUDGE LUCRAFT: Mr Styles, you can either sit or stand,  
 20 whichever you would be happiest doing —  
 21 A. Thank you.  
 22 JUDGE LUCRAFT: — whilst giving evidence. The important  
 23 thing to remember, we all do it when we sit down, is  
 24 perhaps talk more quietly, but the microphone will help  
 25 to amplify your voice. You may be shown some documents

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1 which appear on the small screen in front of you, they  
 2 are also on the larger screen if that's easier to look  
 3 at.  
 4 A. Thank you, sir.  
 5 Questions by MR HOUGH QC  
 6 MR HOUGH: You've already given your name as William Joseph  
 7 Styles. Mr Styles, you understand that I am asking you  
 8 questions first on behalf of the Coroner, and then you  
 9 will receive some questions from other lawyers. You're  
 10 nodding.  
 11 You've made a witness statement on 8 December last  
 12 year, we may refer to that as we go.  
 13 What is your current occupation?  
 14 A. I'm currently deputy director in the long-term high  
 15 security estate in HMPPS.  
 16 Q. When did you join HMPPS?  
 17 A. 1992.  
 18 Q. In your long career in the service, have you served as  
 19 governor in three prisons?  
 20 A. I have.  
 21 Q. Just so the jury understand, some people may be referred  
 22 to as being of governor grade, and there will be, in all  
 23 likelihood, more than one of those in a prison, quite  
 24 a number of those in a prison, but there will be one  
 25 governor who is the most senior official in the prison?

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1 A. It can be quite confusing, but a prison has a governing  
 2 governor, a deputy governor, and a number of department  
 3 heads, which are commonly referred to as governors, but  
 4 they are, in fact, junior governors, operational  
 5 managers, rather than being governing governors.  
 6 Q. So when you say that you have served as governor at  
 7 three prisons, is that governing governor of three  
 8 prisons?  
 9 A. I've been governing governor of three prisons, that's  
 10 HMP Whitemoor, HMP YOI Norwich and HMP YOI Wetherby.  
 11 Q. For what period did you hold that role at HMP Whitemoor?  
 12 A. From June 2016 — sorry, from October 2016  
 13 until June 2019.  
 14 Q. That, therefore, covered much of the period when  
 15 Usman Khan was at the prison?  
 16 A. Yes, sir.  
 17 Q. Around what number of prisoners were at Whitemoor while  
 18 you were governing governor?  
 19 A. The operational capacity of Whitemoor Prison is 458, but  
 20 typically the population there would be between 440 and  
 21 450.  
 22 Q. Is it right that a significant number of those were  
 23 category A prisoners?  
 24 A. Typically 30% of the population of HMP Whitemoor are  
 25 category A prisoners.

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1 Q. Among those, some high risk category A prisoners?  
 2 A. During the time I was at Whitemoor, that figure would  
 3 vary between something like 13 and 22, as I recall.  
 4 Q. And also a number of terrorist or TACT offenders?  
 5 A. Correct.  
 6 Q. Was there, while you were governor there, a significant  
 7 Muslim population at Whitemoor?  
 8 A. In my time at Whitemoor, the Muslim population at  
 9 Whitemoor varied from 40% to 44%.  
 10 Q. So materially higher than at many prisons?  
 11 A. I wouldn't say it's uniquely high, because I believe  
 12 there are one or two other establishments in the country  
 13 that have that level of Muslim population in their  
 14 prison, but certainly it's unusually high population of  
 15 Muslim men.  
 16 Q. And therefore your staff would have gained experience in  
 17 the population that you've just described?  
 18 A. Yes.  
 19 Q. As the governing governor, you of course would have had  
 20 a high level of responsibility for the direction of the  
 21 prison strategically?  
 22 A. Yes, that is the — fundamentally, that is the role.  
 23 Q. Would you necessarily be familiar with the detailed  
 24 conduct history of particular prisoners?  
 25 A. No.

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1 Q. So with a population as large as that, there may be  
 2 prisoners doing some quite seriously disruptive things  
 3 without you necessarily knowing every detail?  
 4 A. That's correct.  
 5 Q. Turning to Usman Khan, we know that he was a category A  
 6 high risk prisoner, one of less than 100 such prisoners  
 7 in the entire estate but, as you've told us, one of,  
 8 perhaps, 20 or so such prisoners at Whitemoor?  
 9 A. Correct.  
 10 Q. We also know that he was convicted in quite a high  
 11 profile terrorist trial which featured others who had  
 12 plotted an attack on the London Stock Exchange. What  
 13 knowledge of him and his offending did you have while  
 14 you were governor at Whitemoor?  
 15 A. I knew of his offence.  
 16 Q. So you knew of the trial and what he was alleged to have  
 17 done?  
 18 A. Well, I'm not saying I have an in-depth understanding of  
 19 what happened at the trial, but I knew of his offence.  
 20 I'd become aware of that because the discussions around  
 21 his placement on the Learning Together programme. But  
 22 I would not — possibly not routinely have become aware  
 23 of that level of detail.  
 24 Q. Now we understand that while in a series of prisons, he  
 25 had a history involving some very disruptive behaviour,

1 some incidents of direct involvement with violence, and  
 2 persistent intelligence linking him to groups of  
 3 extremists in prisons.  
 4 Before you came to the time where he was considered  
 5 for the Learning Together programme, were you aware of  
 6 that profile of him in general terms?  
 7 A. No, sir.  
 8 Q. In September 2016, did you participate in a local  
 9 advisory panel for a category A review of Khan?  
 10 A. I did participate.  
 11 Q. If we put on screen {DC5349/17}, we can see that you are  
 12 listed as one of the attendees of a meeting dated  
 13 3 November 2016, so very shortly after your arrival at  
 14 Whitemoor?  
 15 A. Yes.  
 16 Q. If we go to {DC5349/16}, we can see under paragraph 9.2  
 17 that the discussion at that meeting involved identifying  
 18 Khan's risk as being of serious — Khan's risk of  
 19 serious harm in the community as being assessed as high  
 20 under the OASys system. Would you have known that that  
 21 signified a probability of imminent harm on release?  
 22 A. Well, if I could just give some context. That meeting  
 23 was, I think, December 2016. I arrived at Whitemoor in  
 24 mid-October 2016, so my attendance at that meeting —  
 25 and I'm sure you've noted, I didn't chair that meeting,

1 even though I was governor. That was part of  
 2 an induction process to familiarise myself with the  
 3 processes and meetings at Whitemoor, and I would also  
 4 add that although that was one case discussed at that  
 5 meeting, every category A prisoner has their case  
 6 reviewed every year, so that may well have been one of  
 7 ten cases discussed at that meeting and another ten the  
 8 next month and the next month and the next month.  
 9 Q. So while this level of risk was identified at the  
 10 meeting, it may not be something that would have stuck  
 11 in your head in relation to Usman Khan in the months  
 12 that followed?  
 13 A. Correct.  
 14 Q. We can take that off screen now.  
 15 By mid to late 2017, so by the time you had been at  
 16 the prison for about a year, had you developed any  
 17 understanding of Usman Khan's background and his conduct  
 18 history?  
 19 A. Not a deep understanding, no.  
 20 Q. Now, turning to Learning Together. We know that  
 21 Learning Together began courses at Whitemoor from late  
 22 2016/early 2017, that they were rolled out with a notice  
 23 in November 2016, just after your arrival at the prison,  
 24 and that they began in earnest through 2017?  
 25 A. Yes.

1 Q. When you arrived at the prison, what was your  
 2 understanding of Learning Together and its work?  
 3 A. My recollection is that shortly after I arrived at  
 4 Whitemoor — although I have to say my memory of those  
 5 events is not entirely clear — I was contacted by  
 6 either Dr Armstrong or Dr Ludlow by telephone, we had  
 7 a conversation. One of them then sent me some  
 8 literature and an explanation of more about the  
 9 programme, and I wrote back to one of them and that  
 10 began a process whereby they came into the prison to  
 11 meet with us, and that's how Learning Together got  
 12 started at Whitemoor.  
 13 Q. So Learning Together first got started at Whitemoor  
 14 because Dr Armstrong or Dr Ludlow contacted you and  
 15 proposed that the programme be extended to the prison?  
 16 A. I wouldn't necessarily say they proposed.  
 17 Q. They floated the idea?  
 18 A. They presented the idea for discussion.  
 19 The other thing I would also add is that, as far as  
 20 I'm aware, Dr Ludlow and Dr Armstrong had had previous  
 21 engagement with HMP Whitemoor and had been to the  
 22 prison, so I'm not absolutely able to say that they had  
 23 not delivered any activities in any way, shape or form  
 24 prior to that, but my understanding is that  
 25 Learning Together actually started after I arrived

1 there.  
 2 Q. Had you come into contact with Dr Ludlow and/or  
 3 Dr Armstrong before you arrived at Whitemoor?  
 4 A. Yes.  
 5 Q. How was that?  
 6 A. Because they were part of the tutorial staff at  
 7 Cambridge University where I was studying a master's  
 8 degree in penology and criminology.  
 9 Q. Had you therefore discovered what Learning Together was  
 10 as a programme before you came to Whitemoor as governor  
 11 in October 2016?  
 12 A. I think that is very possible, sir, but I cannot  
 13 specifically recall.  
 14 Q. Certainly by the time that Dr Ludlow or Dr Armstrong  
 15 spoke to you and floated the idea of a Learning Together  
 16 programme at Whitemoor, you knew broadly what  
 17 Learning Together was by the end of that conversation?  
 18 A. Yes.  
 19 Q. We know that Learning Together operated and operates,  
 20 when any pause is removed, as a course involving roughly  
 21 an equal number of prison-based students and university  
 22 students studying together within the prison?  
 23 A. Yes.  
 24 Q. Is that how the course was presented to you when  
 25 first — when the idea was first floated?

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1 A. Yes.  
 2 Q. Were you aware at that stage of the prison or prisons  
 3 where Learning Together had previously run courses?  
 4 A. My understanding is that it had been running at Grendon  
 5 very successfully, and I can't say with absolute  
 6 certainty, but I do recall having a telephone  
 7 conversation with the governor at Grendon, Dr Jamie  
 8 Bennett, to discuss some of the benefits of the  
 9 programme, but I cannot recall in detail that  
 10 conversation.  
 11 Q. As an experienced Prison Service senior employee, you  
 12 would have understood the basic profile of Grendon as  
 13 a prison?  
 14 A. I've never worked at Grendon or had any professional  
 15 involvement with Grendon. My understanding is that it  
 16 is a secure category C establishment that runs  
 17 therapeutic programmes.  
 18 Q. Did you know at the time that it was a therapeutic  
 19 community prison, a complete therapeutic community  
 20 prison, with an element of democratic decision-making in  
 21 its governance?  
 22 A. I did.  
 23 Q. And that it had special reception criteria so that in  
 24 order to get into Grendon you had to fulfil criteria not  
 25 entirely common through the prison system?

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1 A. Yes.  
 2 Q. Whitemoor, therefore, had a different profile in that it  
 3 had a significant number of category A offenders held in  
 4 different high security conditions?  
 5 A. That's correct.  
 6 Q. As you were considering the development of  
 7 Learning Together into Whitemoor, was consideration  
 8 given to how the programme might be adapted or how  
 9 safeguards might be added for the circumstances of  
 10 Whitemoor?  
 11 A. Yes, but that may require some expanded conversation.  
 12 Q. I was going to ask you to expand. What discussions did  
 13 you have with the people from Learning Together about  
 14 how the programme might be rolled out to the particular  
 15 situation at Whitemoor?  
 16 A. So in the initial discussions with the Learning Together  
 17 staff, we involved colleagues from the reducing  
 18 re-offending and learning and skills posts. Assessing  
 19 risk and controlling environments and controlling risk  
 20 is absolute bread and butter stuff for us, so that is  
 21 business as usual, so those discussions would have been  
 22 very much about can it be run safely, in what  
 23 environment, et cetera.  
 24 Q. And what was the conclusion reached about whether the  
 25 course could be run safely?

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1 A. My recollection of our first meeting is vague, but  
 2 I think that Ruth and Amy came into the — sorry,  
 3 Dr Ludlow and Dr Armstrong, came into the establishment,  
 4 met myself and others. I think that included the head  
 5 of reducing re-offending, Craig Nethercott, and  
 6 Gina Butler, who is the head of learning and skills who  
 7 worked for Craig Nethercott, and possibly others.  
 8 We talked about the programme and Gina and possibly  
 9 Craig then took Amy and Ruth round to scope the  
 10 possibilities of running the programme at Whitemoor.  
 11 Q. Were you involved in those more detailed scoping  
 12 discussions?  
 13 A. Not that I recall.  
 14 Q. Were you aware where in the prison the course was going  
 15 to be held, Workshop 9?  
 16 A. I would have been aware, yes.  
 17 Q. What would you have understood about that as a place in  
 18 the prison and its physical features?  
 19 A. As in every workshop at Whitemoor a highly controlled  
 20 and secure environment with CCTV coverage and facilities  
 21 for staff to supervise.  
 22 Q. Now, we know that Learning Together, as well as having  
 23 a mission to bring education to prisons, also had  
 24 a mission to maintain contacts with inmates after their  
 25 release, and to assist them post-release as academic

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1 peers. Were you aware of that element of  
 2 Learning Together's mission?  
 3 A. I was vaguely aware of it, however, it wasn't a huge  
 4 consideration for us, and I am afraid Usman Khan was  
 5 an exception to this, but because of the nature of  
 6 Whitemoor Prison, I think in all the time I was there,  
 7 we released one prisoner from Whitemoor. So for 99% of  
 8 men there, they were at the beginning of what would  
 9 probably be a very long custodial journey and would be  
 10 at several other prisons before they were released.  
 11 So the element of remaining in contact with men  
 12 after they'd been released didn't feel hugely relevant  
 13 for us.  
 14 Q. So, is this right: consideration wasn't specifically  
 15 given to whether there needed to be safeguards  
 16 concerning links between inmates and Learning Together  
 17 after the release of those inmates?  
 18 A. I think that is right, yes.  
 19 Q. Now we know that Usman Khan applied for the  
 20 Learning Together course, Writing Together,  
 21 in November 2017. Did you discover about his  
 22 application at the time?  
 23 A. I was aware, yes.  
 24 Q. How did you become aware of that?  
 25 A. It was brought to my attention, I think, by

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1 Steve Machin, who I know has already been here. There  
 2 was a discussion that was felt to be appropriate about  
 3 whether or not Usman Khan should be allowed to join the  
 4 Learning Together programme.  
 5 Q. Was that a discussion between just you and Mr Machin or  
 6 were other people involved?  
 7 A. I don't recall if it was a single discussion or whether  
 8 there was more than one discussion, but my general  
 9 recollection is there was a discussion that involved  
 10 myself, Steve Machin, I think it was Amy, I don't know  
 11 about Ruth, and learning and skills staff and possibly  
 12 others. But I don't think there was one single  
 13 discussion; I think there were several discussions and  
 14 sub-discussions involving several people about the  
 15 appropriateness of Usman to join the programme.  
 16 Q. What were the views expressed in that discussion?  
 17 A. So the concern was, he was a TACT offender.  
 18 Consideration was given to risk, opportunity, benefit.  
 19 Part of Learning Together — as part of the  
 20 Learning Together programme, some of the coursework  
 21 involved ethics, and there was discussion about whether  
 22 or not somebody who had a history of extremist ideology  
 23 would be able to participate effectively in a respectful  
 24 discussion about ethics, so I think that was one element  
 25 of the discussion.

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1 Public perception was also part of the discussion,  
 2 and we also discussed — we also had a discussion around  
 3 kind of the ethical issues of denying somebody  
 4 an education opportunity based solely on their offence.  
 5 Q. In the course of those discussions when you were having  
 6 those discussions, were you aware of the intelligence  
 7 profile within the prison concerning Khan, what was  
 8 being recorded in the Mercury Intelligence record  
 9 generally about his conduct?  
 10 A. No.  
 11 Q. Would you, therefore, have known at the time that there  
 12 was a significant body of intelligence suggesting that  
 13 he remained a radicalising influence and was a senior  
 14 figure within Muslim gangs in the prison?  
 15 A. Not specifically, although I am confident that in my  
 16 discussions with Steve Machin and his line manager, who  
 17 was the head of CTCP, Paul Benson, I would have been  
 18 given a picture, if not the detail, that Usman was  
 19 a difficult and risky character within the population.  
 20 Q. Now, we can all understand the view being expressed that  
 21 somebody shouldn't be excluded from education because of  
 22 their offending years ago. But was it discussed in  
 23 those discussions about clearing Usman Khan to  
 24 participate in the course, was it discussed that he  
 25 might be excluded not because of the nature of his

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1 offending, but because of that intelligence picture that  
 2 made him, as you put it, a risky character?  
 3 A. I don't think so, but just in terms of the context, as  
 4 I'm sure you've already heard, Whitemoor is a high  
 5 security prison with a population — a very difficult  
 6 and challenging population of men who are serving  
 7 sentences for very significant — sorry, serving  
 8 sentences for very significant offences.  
 9 So every prisoner had to work and we — you know, it  
 10 was fairly routine for us to have to make employment  
 11 decisions for all of the men, and many of whom presented  
 12 various risk factors. It was a highly controlled  
 13 environment. It was something we were very good at.  
 14 Q. What, then, was the conclusion of those discussions?  
 15 A. The conclusion was that Usman Khan should be allowed to  
 16 join Learning Together.  
 17 Q. Was that a view in which you shared?  
 18 A. Yes.  
 19 Q. And in brief, why did you share that view?  
 20 A. Because I thought the risks that were presented were  
 21 controllable and the potential benefits for Usman, given  
 22 his fairly imminent release, were — I thought it was  
 23 a positive opportunity for Usman and for us.  
 24 Q. Did it occur to you that because he did have a fairly  
 25 imminent release, there may be some further risks to

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1 consider about his continued contact with the  
 2 Learning Together community or family after release?  
 3 A. I don't think it did.  
 4 Q. Now, we have heard about the process whereby others  
 5 played a role in clearing him for the course, I won't  
 6 ask you about those elements, but I will ask you this:  
 7 since November 2019, has the Prison Service in general,  
 8 or Whitemoor in particular, introduced any further or  
 9 different procedures for clearing inmates to participate  
 10 in courses of this kind?  
 11 A. Well, firstly, I would ask -- I would suggest that might  
 12 be a question for the corporate witness in terms of  
 13 talking about prisons policy, but I would say there has  
 14 been a broader response to several incidents, this  
 15 incident being one of them, in terms of HMPPS increasing  
 16 our capability and capacity regarding TACT offences.  
 17 Q. I'll certainly ask the corporate witnesses about that  
 18 generally, but as far as you're aware, just focusing on  
 19 the question of clearing people to participate in  
 20 courses, have there been any changes in the systems in  
 21 that regard?  
 22 A. Not that I'm aware of, although I would say  
 23 Learning Together is not running at Whitemoor Prison.  
 24 Q. We're aware of that from Dr Armstrong and Dr Ludlow.  
 25 A. Okay.

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1 Q. Looking beyond Usman Khan and the terrible facts of this  
 2 case, what experience and feedback have you had about  
 3 the effects of the Learning Together course on inmates  
 4 who have participated?  
 5 A. Would you ask the question again, please?  
 6 Q. Of course. Setting aside Usman Khan and the terrible  
 7 facts of this case, what experience and feedback have  
 8 you had about other inmates who have participated in  
 9 Learning Together and the effects on them?  
 10 A. It's very difficult to set aside the impact of the  
 11 Fishmongers' Hall attack, but if I were able to do that,  
 12 I would say the feedback from everybody involved in  
 13 Learning Together at Whitemoor, that is staff, the  
 14 Learning Together attendees and prisoners, was  
 15 absolutely outstandingly positive, overwhelmingly  
 16 positive. Amazing, actually.  
 17 MR HOUGH: Thank you very much. Those are all my questions.  
 18 Sir, would that be a convenient time for the  
 19 mid-morning break?  
 20 JUDGE LUCRAFT: It would, Mr Hough. We'll break there.  
 21 Mr Styles, we're going to take our mid-morning  
 22 break, just so we can all have 15 minutes to have  
 23 a comfort break and come back refreshed, and we'll sit  
 24 again in 15 minutes' time.  
 25 A. Thank you.

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1 JUDGE LUCRAFT: Thank you very much.  
 2 (In the absence of the jury)  
 3 I'll rise.  
 4 (10.50 am)  
 5 (A short break)  
 6 (11.07 am)  
 7 JUDGE LUCRAFT: Do you want to come forward, Mr Armstrong.  
 8 (In the presence of the jury)  
 9 Mr Armstrong.  
 10 Questions by MR ARMSTRONG  
 11 MR ARMSTRONG: Mr Styles, my name is Nick Armstrong and  
 12 I ask questions on behalf of Jack Merritt's family.  
 13 I want to ask you about the Learning Together  
 14 process and how it comes to Whitemoor. We know that you  
 15 start at Whitemoor in October of 2016 and Gina Butler  
 16 told us that it rolled out at pace, was her expression,  
 17 and we can see that, I'll come to a document later which  
 18 shows, as Mr Hough has said, a November 2016 activity,  
 19 and it's firmly in place in 2017 and Mr Khan is on it by  
 20 the end of 2017. Now just to help me understand how  
 21 this works: around this time you are doing a master's  
 22 degree at the University of Cambridge?  
 23 A. Yes, sir, I am.  
 24 Q. Just tell us, when did that start?  
 25 A. At the beginning of 2016 I attended three residential

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1 two-week blocks throughout 2016, the last one  
 2 being September.  
 3 Q. I see. And is that a two-year course, or...?  
 4 A. It is.  
 5 Q. So it goes from 2016 through to the end of 2017, or?  
 6 A. That's correct.  
 7 Q. So over this period?  
 8 A. Yes.  
 9 Q. And that's done on residential weekends, is it, and it  
 10 requires work in between?  
 11 A. Three residential blocks each year over the two years.  
 12 Q. Each year. And how long are those blocks?  
 13 A. Two weeks.  
 14 Q. So two weeks times three each year?  
 15 A. Yes.  
 16 Q. I see. And presumably you're working in between?  
 17 A. Yes.  
 18 Q. I see. And you carve that time out. I mean, that's  
 19 quite busy, you have to do that alongside your  
 20 operational duties as the governor of a prison?  
 21 A. So the two-week blocks are -- yes, that requires  
 22 commitment and own time invested, but most of the work  
 23 is done in our own time between the residential blocks.  
 24 Q. Including things like thesis writing, which we know you  
 25 did?

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1 A. That's correct.  
 2 Q. Right. And that's how you first come across, I think,  
 3 possibly, Ruth Armstrong and Amy Ludlow; is that right?  
 4 A. Yes.  
 5 Q. I see. You also know Jamie Bennett, who is another  
 6 champion of Learning Together, and who was at Grendon?  
 7 A. Yes.  
 8 Q. And you've told Mr Hough that there was a conversation  
 9 with him. Was he still at Grendon when you had that  
 10 conversation?  
 11 A. I believe so.  
 12 Q. Because he goes onto Long Lartin, doesn't he?  
 13 A. He does --  
 14 Q. A category A prison?  
 15 A. That's correct.  
 16 Q. And then he goes on and he becomes a deputy director for  
 17 security, order and counter-terrorism at the Ministry of  
 18 Justice?  
 19 A. Yes.  
 20 Q. And you now work for the Ministry of Justice as well,  
 21 I mean directly within central MoJ rather than at  
 22 a prison?  
 23 A. I would not say that was correct. I work for the Prison  
 24 Service. I work for HMPPS.  
 25 Q. But centrally you go to work not every day in a prison

1 now; is that right?  
 2 A. I work frequently in prisons, but yes, I -- essentially  
 3 I have a headquarters role, yes.  
 4 Q. Yes. Thank you.  
 5 Now, that conversation with Dr Bennett, he tells you  
 6 it's successful at Grendon?  
 7 A. Yes.  
 8 Q. Now I just want to press a little bit on that. Can you  
 9 remember the language of that? Was that very  
 10 successful? Was he being enthusiastic about it,  
 11 saying: Will, this is great, we need to do this?  
 12 A. To be honest with you, I don't remember the detail of  
 13 the conversation other than that Jamie Bennett was  
 14 positive about Learning Together.  
 15 Q. All right. I'm going to come onto some of the  
 16 enthusiastic language about this a little bit later, but  
 17 can I -- are you aware at that stage, do you remember,  
 18 there has been -- there is no published even academic  
 19 evaluation of Learning Together. That's not done until  
 20 2020; do you know that?  
 21 A. No.  
 22 Q. There seems to have been some informal pilot study work  
 23 but nothing published at the time that it's rolled out  
 24 from Grendon to Whitemoor; do you know that?  
 25 A. No.

1 Q. Okay. And you agree, I think, that it's a big step,  
 2 there are a lot of differences between the therapeutic  
 3 community of Grendon and the high security estate?  
 4 A. There are a lot of differences between Grendon and  
 5 Whitemoor, I agree.  
 6 Q. Do you have any idea why they chose Whitemoor from your  
 7 point of view? Why it was coming to Whitemoor rather  
 8 than a category B prison, for example?  
 9 A. I believe location was part of it: Whitemoor is in  
 10 Cambridgeshire --  
 11 Q. Yes.  
 12 A. -- so you know there's a close proximity to Cambridge.  
 13 Q. To the university, so it's partly a geographical thing.  
 14 So Grendon is about an hour and a half drive from  
 15 Cambridge, Warren Hill is about an hour and a half drive  
 16 from Cambridge, but Whitemoor is about an hour, isn't  
 17 it?  
 18 A. Yes.  
 19 Q. Now, this is in 2016, moving into 2017. We've been  
 20 through this with another witness, but we know that by  
 21 6 July 2018, that's the date of the grant,  
 22 Learning Together had money directly from the Ministry  
 23 of Justice; there was a grant dated 6 July 2018 for  
 24 £214,000 over two years; did you know that?  
 25 A. I don't recall the detail of that, I am afraid.

1 Q. But do you remember there being what's called  
 2 an innovative grant?  
 3 A. I don't recall.  
 4 Q. You weren't part of that process?  
 5 A. I don't recall.  
 6 Q. I'm just asking you that -- you say that you were  
 7 a champion of Learning Together, and you say that's the  
 8 word you use in your witness statement.  
 9 A. Yes.  
 10 Q. But you weren't part of the support for that  
 11 application?  
 12 A. Not that I recall.  
 13 Q. Okay. You did do a couple of things. Can I just ask  
 14 about this. Can I bring up a witness statement  
 15 {WS0444A/1}, please. This is an Amy Spolton, and then  
 16 I'm going to go -- this is Amy Spolton of the  
 17 Fishmongers' Company, and she's got an exhibit to this  
 18 witness statement, which is {WS0444A-7/2}, if this  
 19 works. Yes.  
 20 So what she's exhibiting to her statement here is  
 21 an application to the Fishmongers' Company by  
 22 Learning Together, so I'm not suggesting you're part of  
 23 this process, but if we just go to the second half of  
 24 this page. Can we go back to the first half of this  
 25 page? Sorry, I might just need to refine this

1 reference. Sorry, can I go to the next page  
 2 {WS0444A-7/3}, sorry, this is my referencing,  
 3 I apologise, and then if you look at "Our application"  
 4 where Learning Together talk about that to the  
 5 Fishmongers':  
 6 "An especially exciting development this year has  
 7 been a decision by Will Styles, Governor at HMP  
 8 Whitemoor, to turn an industries workshop in the prison  
 9 into a Learning Together Study Centre."  
 10 Then in the next paragraph down you say:  
 11 "With the Governor's support, Richard Vince [and we  
 12 will hear from him at some point], Executive Director of  
 13 the Long Term and High Security Estate within HM Prison  
 14 and Probation Service, has invested £30,000 to cover the  
 15 costs of an initial refurbishment of the new  
 16 Learning Together Study Centre."  
 17 Now, I'm assuming all of this is available by the  
 18 time courses start running, this refurbished centre?  
 19 A. No, I don't believe so. I actually think the courses  
 20 started running in a different workshop and once we'd  
 21 established that Learning Together was working very  
 22 well --  
 23 Q. I see.  
 24 A. -- my recollection is at that point there was enthusiasm  
 25 to expand the provision and create a dedicated

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1 workspace, work area.  
 2 Q. I see. So are you able to help us with when this had  
 3 been done, then? When -- I mean, let's just establish  
 4 this: it's factually true that you helped with this and  
 5 got a £30,000 grant to get it refurbished; is what  
 6 Learning Together say about this factually true?  
 7 A. I think -- well, my recollection is that the workshop  
 8 that we were moving into, or the Learning Together  
 9 provision was going to move into, required -- it had  
 10 been used as a storage area for quite some time and  
 11 required significant work in terms of toilets, so there  
 12 was some investment required in order to refurbish and  
 13 maintain parts of that room.  
 14 I recall that that did require a substantial sum of  
 15 money. I don't recall the absolute detail of how that  
 16 funding was sourced, but that information will be  
 17 available through the finance department at  
 18 HMP Whitemoor.  
 19 Q. To the best of your recollection, two questions, to the  
 20 best of your recollection, the fact that this was your  
 21 decision to turn the workshop into a study centre and  
 22 the £30,000 grant, does that sound about right?  
 23 A. It was my decision --  
 24 Q. Yes.  
 25 A. -- with others, but ultimately that's my stamp on that

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1 decision to turn that workshop into a Learning Together  
 2 centre. The £30,000, I'm not sure that would be  
 3 factually correct to refer to that as a grant.  
 4 Q. Well, okay, but does the amount of money sound about  
 5 right?  
 6 A. It does.  
 7 Q. All right. And are you able to help us with the date  
 8 that you make this decision?  
 9 A. To be honest with you, I'm not.  
 10 Q. All right.  
 11 Now, so that's -- you're plainly supporting this  
 12 process. I just want to ask you a question, I've asked  
 13 other witnesses about this, you don't know about  
 14 research evaluation before it comes to Whitemoor.  
 15 Learning Together carry out research evaluation that  
 16 basically consists of interviewing the people on  
 17 Learning Together programmes, and asking them how they  
 18 feel about the programme and whether it's benefited  
 19 them. It's very subjective and it doesn't attempt to  
 20 cross-reference the truth of what they are being told.  
 21 Now, I've put to other witnesses that that carries  
 22 risks when you're dealing with particularly terrorist  
 23 offenders, because you are validating feelings and  
 24 attitudes that may be distorted.  
 25 Now, do you know in 2016 or 2017 that that is the

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1 way Learning Together works and evaluates? Do you know  
 2 that level of detail of their research?  
 3 A. I am afraid I'm not able to tell you about  
 4 Learning Together research techniques.  
 5 Q. Okay. Gina Butler I asked about this yesterday, and she  
 6 said she thought there was some kind of approval process  
 7 which might be partly a University of Cambridge process,  
 8 but might also be a Prison Service process with  
 9 potentially psychologists involved. Do you know  
 10 anything about that kind of process?  
 11 A. I recall at some point being involved in discussion  
 12 about research into Learning Together with Ruth and Amy,  
 13 but I don't recall the detail.  
 14 Q. Now, that discussion was you and Ruth and Amy or anybody  
 15 else?  
 16 A. I don't recall. All I can say is that I'm aware that  
 17 the Learning Together programme, there was an evaluation  
 18 element involving it, but I cannot remember any more  
 19 detail.  
 20 Q. But by whom?  
 21 A. I can't recall.  
 22 Q. And do you remember psychologists being involved in it?  
 23 A. I don't recall.  
 24 Q. Because I'm suggesting to you this is a peculiarly  
 25 psychological point, which is that you may not be

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1 helping distorted thinking or distorted thinkers by  
 2 carrying out this process, and it's the  
 3 leva Cechaviciute people in the universe who might know  
 4 about that. You don't recall any process involving her  
 5 or any other forensic psychologist?  
 6 A. No.  
 7 Q. Okay. You have told Mr Hough that there wasn't any  
 8 discussion also, it wasn't on the radar, any discussion  
 9 about the risks associated with Learning Together  
 10 because it has a mission statement that extends beyond  
 11 the prison walls and into release. Now, Mr Machin said  
 12 he didn't remember a discussion about that, and he  
 13 thinks that there should have been, and he would change  
 14 things now. You don't remember a conversation about  
 15 that either?  
 16 A. No.  
 17 Q. And you tell us, frankly, you had only had one release  
 18 from Whitemoor in the whole of your time as a governor  
 19 there?  
 20 A. Yes.  
 21 Q. Was that Mr Khan?  
 22 A. Mr Khan wasn't released from Whitemoor.  
 23 Q. Right, so only one person goes out from Whitemoor, but  
 24 that doesn't --  
 25 A. To my best recollection, I can only recall one prisoner

1 being released directly from Whitemoor while I was  
 2 governor there.  
 3 Q. Remind us how long you were a governor at Whitemoor?  
 4 A. Over three years.  
 5 Q. Doesn't that mean when you are looking at somebody who  
 6 is -- I mean, I know he is not released from Whitemoor,  
 7 but he is transferred to Woodhill ten days before he is  
 8 released; doesn't that mean that someone like Khan is so  
 9 exceptional you should be having a conversation about  
 10 these sorts of matters?  
 11 A. I'm not entirely clear I understand your question.  
 12 Q. Doesn't the exceptionality of somebody coming out from  
 13 Whitemoor or proximate to their time in Whitemoor mean  
 14 that you should be thinking about release and the  
 15 programmes they're on on release? So you're telling us  
 16 that you weren't thinking about it because it's so  
 17 exceptional. I'm putting it to you that it's so  
 18 exceptional you should be talking about it.  
 19 A. In terms of generally setting up Learning Together at  
 20 HMP Whitemoor, as I believe I said earlier, it didn't  
 21 feel of huge relevance at the time in terms of the  
 22 overall programme because we didn't release prisoners  
 23 from Whitemoor. 99.5% of prisoners moving from  
 24 Whitemoor would move to another prison and probably  
 25 another prison after that. If the question is

1 specifically about whether there should have been  
 2 discussion about Learning Together's involvement with  
 3 Mr Khan after his release, that -- I would see that as  
 4 a separate question.  
 5 Q. Well, let me put it to you this way, and we'll come back  
 6 to your knowledge of Mr Khan in a moment, but you know  
 7 what Learning Together is doing reasonably well?  
 8 A. Yes.  
 9 Q. You know that it has a mission statement for beyond the  
 10 prison walls?  
 11 A. Yes.  
 12 Q. You know that release from a high security estate is  
 13 extremely rare and carries lots of management risks?  
 14 A. Yes.  
 15 Q. And you know that there are particular boundaries and  
 16 difficulties around terrorist prisoners and distorted  
 17 thinking and policing boundaries with them and not  
 18 taking at face value things they say?  
 19 A. Would you rephrase the question?  
 20 Q. You know that there are particular risks around  
 21 terrorists and the need to be vigilant and when you are  
 22 entering into relationships with them you need to police  
 23 those boundaries with them, remind yourself at all times  
 24 who they are?  
 25 A. Yes.

1 Q. You know that Learning Together is run by academics, not  
 2 security specialists?  
 3 A. Well, Learning Together, if we're talking about  
 4 Dr Armstrong and Dr Ludlow, they are people with  
 5 a significant level of experience with prisons.  
 6 Q. They have no operational experience of risk assessment,  
 7 do they? They're not security specialists?  
 8 A. You would have to ask them.  
 9 Q. We have, they say they're not.  
 10 A. Okay.  
 11 Q. And they don't have access to things like prison  
 12 intelligence. They don't have training on OASys or ERG  
 13 or anything like that, do they?  
 14 A. You would have to ask them, but not that I'm aware of.  
 15 Q. They don't have the kind of 20 years of hard experience  
 16 that somebody like Steve Machin has, do they?  
 17 A. Clearly not.  
 18 Q. And the people they are being assisted by are people  
 19 like Saskia Jones and Jack Merritt, a 23-year-old, a  
 20 25-year-old, first job out of university, all those  
 21 sorts of things, who also don't have great experience of  
 22 the world and the fact they're dealing with people who  
 23 are very dangerous and may be lying to them. You know  
 24 that it's run by people of that age, or being assisted  
 25 by people of that age, don't you, Mr Styles?

- 1 A. Well, I would probably separate two of the things you  
2 have implied there. So firstly, I wouldn't suggest  
3 their age makes people less than competent in working in  
4 a prison environment, so I would put the age to one  
5 side, but I do take your point in terms of their  
6 relative lack of experience in working in that  
7 environment, yes.
- 8 Q. Well, I am going to press you on that. We know, all of  
9 us, don't we, that experience teaches you important  
10 things about dealing with people, and it teaches you  
11 important things about the risks that you take.  
12 I imagine you know more about this than you did when you  
13 were 25?
- 14 A. Yes.
- 15 Q. You also know that when you're looking at somebody like  
16 Usman Khan, just as he might be somebody who is  
17 deceptive or gaming the system or seeking an opportunity  
18 for any kind of ill doing, he might be somebody who is,  
19 even if he is changing, his change is very fragile, very  
20 new, and very susceptible to being reversed, isn't he?
- 21 A. Well, I think that's a little bit of a sweeping  
22 statement. I'm not sure I'm able to talk about the kind  
23 of extent of the reversibility of Usman Khan's  
24 behaviour.
- 25 Q. Well, I'm just going to put this to you in general

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- 1 terms: we have looked in this Inquest at his childhood  
2 history and his extremism and his radicalism at 19. He  
3 then spends almost all of his adult life not just in  
4 prison but in category A, and in high security  
5 category A, where he does only limited offending  
6 behaviour work, certainly not enough to take him off  
7 high risk category A, and where all the structured  
8 decision-making that is done on him, the ERG and the  
9 OASys, speaks with one voice and says he remains a high  
10 risk of imminent harm, as you accepted to Mr Hough.
- 11 A. Oh, pardon me, sorry.
- 12 Q. Now, in those circumstances, even if we have cause for  
13 a bit of optimism at this moment of release, even if  
14 there is some behavioural change at this stage, there is  
15 a very real risk, and you know, that any change is  
16 fragile and recent and susceptible to being reversed,  
17 isn't it?
- 18 A. I would just come back on two points. First of all, in  
19 terms of the experience of the Cambridge students  
20 attending Learning Together and the Learning Together  
21 staff, I do think it's important to make the point that  
22 they were supported in that work by a very substantial  
23 team of over 550 staff at HMP Whitemoor and Gina Butler  
24 and her line manager and Steve Machin and the head of  
25 reducing re-offending, so they weren't left on their own

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- 1 to do that work, they were supported by the highest  
2 levels of control in the Prison Service estate.
- 3 Q. But what I'm asking you about is something slightly  
4 different.
- 5 A. Yes.
- 6 Q. I understand the point that is made, that if you are  
7 risk assessing in relation to the prison and the work  
8 that's been done within the prison, you are in a high  
9 security environment with nine CCTV cameras and a host  
10 of officers and alarms and the rest of it, but you do  
11 know that this is an organisation with a — and you know  
12 that this is an organisation with a mission statement to  
13 carry on beyond the walls, and you know all of the risks  
14 that I've just taken you through. Both of those things  
15 are in your head?
- 16 A. I'm sorry, you're telling me what I know, but  
17 I apologise, but I'm not entirely clear of the actual  
18 question you're asking me.
- 19 Q. I'm just putting to you — I'm not sure — you're being  
20 very resistant to this. He is very high risk, all of  
21 the materials tell us that. He is going to be going out  
22 and be involved in this programme, which is run by  
23 a couple of people who are academics and not security  
24 specialists, and a load of 23 and 25-year-olds and  
25 people like that in their first job out of university.

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- 1 Now, that does give rise to some pretty serious risks,  
2 doesn't it, Mr Styles?
- 3 A. The level of involvement that Usman Khan would or would  
4 not have had once he left prison would have been in the  
5 hands of the agencies who were managing his risk and his  
6 case in the community.
- 7 Q. I know that.
- 8 A. I do understand the point you are making.
- 9 Q. I understand that. But Mr Styles, what I'm putting to  
10 you is, you know, because of your relationship with  
11 Learning Together — I mean, I put this to — I'll put  
12 it another way. I put this to Mr Machin yesterday: you  
13 cannot work in silos; you have to have some regard as to  
14 what happens when he goes off your patch, don't you?
- 15 A. Yes.
- 16 Q. And you know that in this particular context, which is  
17 a high risk individual hitting this organisation, that  
18 is a particularly serious need, isn't it?
- 19 A. I would respond to that, that that is precisely why it  
20 was so important that we did everything we possibly  
21 could to reinforce the protective factors that Usman was  
22 starting to develop, precisely because we were trying to  
23 reduce the risk that he would pose to the public after  
24 he left our custody. That's exactly why it was  
25 important that we worked with Usman.

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1 Q. I see. All right. I will come back to this.  
 2 Just before I do, just to take a step back and look  
 3 at how he ends up on Learning Together in the first  
 4 place. Mr Hough asked you some questions about the  
 5 conversations that you had and you told him that there  
 6 were conversations and they were multi-layered  
 7 conversations. Can I just look at what you say about  
 8 this in your witness statement. {WS5010/1}, please.  
 9 Now, first of all, paragraph 3, because I think your  
 10 position is that you have some knowledge but not a deep  
 11 knowledge of Usman Khan; yes?  
 12 A. Yes.  
 13 Q. And you say here, fourth line up from the bottom of  
 14 paragraph 3:  
 15 "Whilst he was at ... Whitemoor I was aware of  
 16 Usman Khan's offending history. I was also aware of his  
 17 involvement with Learning Together and the progress he  
 18 was perceived to have made in terms of the risk he posed  
 19 of extremist, radicalised or terrorist offending."  
 20 So you knew or believed that he was making  
 21 progression? So you knew at least in some terms?  
 22 A. Yes.  
 23 Q. Paragraph 9, please {WS5010/3}, this is where you talk  
 24 about this:  
 25 "Usman Khan applied to take part in

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1 Learning Together. That application needed support, or  
 2 at least no substantial objection, from  
 3 counter-terrorism managers, learning and skills managers  
 4 and the offender management team..."  
 5 So that's basically Steve Machin, Gina Butler and  
 6 Jo Boulton, isn't it?  
 7 "... within the prison as well as from the Learning  
 8 Together team who managed the applications. Mr Khan was  
 9 mentioned during a number of discussions as being  
 10 someone who could benefit greatly if he were to engage  
 11 with the programme, although there were some doubts,  
 12 given his offence, as to whether he would do so."  
 13 Then you talking about the discussions you talked  
 14 about with Mr Hough:  
 15 "The discussions were focused on the risk involved,  
 16 public perception ... and the ethical issues of denying  
 17 someone an educational opportunity because of their  
 18 offence history. We were all aware of Mr Khan's  
 19 application and his offending history."  
 20 So that suggests that you were having a discussion,  
 21 more than one discussion, and you are seeking in that  
 22 witness statement to communicate to this Inquest that  
 23 you were all fully aware of Mr Khan's application and  
 24 his -- and his offending history?  
 25 A. I was aware of his application and his offending

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1 history. Fully aware, I think that is open to...  
 2 Q. All right.  
 3 A. (Overspeaking).  
 4 Q. This is an important conversation to have, isn't it,  
 5 I mean, you're telling us this is multi-factorial, there  
 6 are many people involved in this conversation, whether  
 7 he can do this programme, whether we can put a terrorist  
 8 on this programme?  
 9 A. Yes.  
 10 Q. There is no document of this conversation, no record of  
 11 it, no minutes, nothing.  
 12 A. There is a context there, that although we are talking  
 13 about Mr Khan, we are actually also talking about  
 14 a prison where, as we've already described, there were  
 15 probably 130 category A prisoners, almost every prisoner  
 16 there presents a very significant risk, almost every  
 17 prisoner has to go to some kind of employment or  
 18 activity. It's a highly controlled environment with  
 19 highly controlled processes, so risk assessment  
 20 procedures are very well established at Whitemoor.  
 21 So we're talking about Mr Khan going to  
 22 an educational programme, but all of the other  
 23 category A prisoners at Whitemoor also had to go to some  
 24 kind of work activity or employment.  
 25 Q. But, Mr Styles, you're able to tell us in your witness

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1 statement some detail about the level of conversation,  
 2 and your reason why you're doing that in some detail is  
 3 because you can see that this conversation matters?  
 4 A. Yes.  
 5 Q. And it obviously matters, doesn't it, because you're  
 6 putting a high risk category A prisoner on a very new  
 7 programme, so you want to think about that?  
 8 A. So when Mr Khan applied, I believe Steve Machin actually  
 9 brought it to my attention, or it may have been Steve's  
 10 line manager, brought it to my attention.  
 11 The thing that was different about Mr Khan applying  
 12 for Learning Together as opposed to other category A or  
 13 TACT or Pathfinder cases applying for some kind of  
 14 educational activity was that Learning Together was  
 15 quite new, so that's why he felt there should be  
 16 a discussion.  
 17 Q. Mr Machin told Mr Rule yesterday that he regrets there  
 18 not being a record of the process that he carried out.  
 19 You must regret that a conversation as important as this  
 20 one isn't documented anywhere?  
 21 A. Well, in the circumstances that we are in right here  
 22 today, I do regret that there isn't a record of that  
 23 discussion but, again, I would put into context, we  
 24 don't have a risk record of every decision we make about  
 25 allocating a prisoner to an employment activity or

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1 a programme.  
 2 Q. But he is not just any prisoner, and it's not just any  
 3 programme, Mr Styles, is it? This is not routine stuff.  
 4 A. Elements of it are routine, elements of it are not. So  
 5 I absolutely accept that if there hadn't been some kind  
 6 of exceptional factors in this discussion, then that  
 7 particular — or those discussions referencing Mr Khan  
 8 and Learning Together wouldn't have taken place.  
 9 Q. Let me ask you about ethics. You talked, and you told  
 10 Mr Hough a moment ago, the ethical issues of denying  
 11 someone an educational opportunity because of their  
 12 offence history. Now, as I understand it, that's  
 13 a conversation that you're having with Ruth and Amy that  
 14 basically says: can we deny an educational opportunity,  
 15 is it moral to deny an [educational] opportunity to  
 16 anybody?  
 17 A. I think my statement may have given the impression there  
 18 was more emphasis on that discussion than there actually  
 19 was, but yes, I do recall in the discussion we talked  
 20 about whether it was right or wrong to deny somebody  
 21 an opportunity to attend education based solely on their  
 22 offence.  
 23 Q. Now, there is no legal issue, I'll put to you, with  
 24 denying somebody access to an educational programme or  
 25 potential education programme, you know that, right?

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1 You can do it in the prison, you can say no?  
 2 A. You could say no.  
 3 Q. Rule 32 of the prison rules is quite light on this,  
 4 Governor Styles:  
 5 "Every prisoner able to profit from the educational  
 6 facilities provided at a prison shall be encouraged to  
 7 do so. Educational classes shall be arranged at every  
 8 prison and subject to any directions of the Secretary of  
 9 State, reasonable facilities shall be afforded to  
 10 prisoners."  
 11 So there shall be classes, you can have access, but  
 12 that's qualified by directions, which includes security,  
 13 don't they?  
 14 A. Yes.  
 15 Q. And also there is no guarantee anywhere in the law of  
 16 any particular form of education. Mr Rule again asked  
 17 questions yesterday pointing out GCSEs, A-Levels are all  
 18 available within the prison as well. There's no  
 19 particular entitlement to go on the Learning Together  
 20 programme, is there?  
 21 A. No.  
 22 Q. Even the Human Rights Act, just before anybody gets the  
 23 wrong idea, doesn't require that either, it's all only  
 24 about access to things that are otherwise available and  
 25 it's a qualified right; you know that?

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1 A. Not specifically, no.  
 2 Q. All right. But where you get to with this, paragraph 10  
 3 is, you end up with a system — can I just bring 10  
 4 up — following the conversation that you have about  
 5 ethics, your approach is, fourth line down:  
 6 "There would need to be exceptional risks and  
 7 reasons to justify denying someone access to education."  
 8 That's the rule you tell us you apply. You get on  
 9 unless there's an exceptional reason not to?  
 10 A. I think that might be a slight misrepresentation of the  
 11 point I was making, which is that in a high security  
 12 prison, almost every prisoner is there for something  
 13 very, very serious. Education activities are generally  
 14 regarded as the lowest risk activity because of tools  
 15 and supervision levels. So to deny a prisoner access to  
 16 the lowest risk activity would be exceptional unless  
 17 they were segregated or there were specific reasons in  
 18 their case related to their behaviour and their  
 19 institutional risk.  
 20 Q. You don't think that Mr Khan, even against that  
 21 background, was an exceptional prisoner?  
 22 A. I don't think that the circumstances that we were  
 23 dealing with with Mr Khan at that time represented  
 24 an exceptional case to stop him attending education  
 25 activities.

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1 Q. Do you think he is an exceptional prisoner as he begins  
 2 to approach release?  
 3 A. Exceptional relative to —  
 4 Q. No, exceptional —  
 5 A. No, I'm asking you — just so I understand the  
 6 question —  
 7 Q. Let me put it to you, Mr Styles, I am going to put to  
 8 you that he is astonishingly exceptional. He is now  
 9 somebody who has spent the whole of his adult life  
 10 pretty much —  
 11 MS LEEK: Sir, I hesitate to interrupt, but I wonder if my  
 12 learned friend could explain what he means by  
 13 "astonishingly exceptional".  
 14 JUDGE LUCRAFT: Yes.  
 15 MR ARMSTRONG: Well, exceptional within exceptional.  
 16 MS LEEK: I'm really sorry to interrupt, but exceptional in  
 17 what way: exceptionally high risk? Exceptionally  
 18 difficult? Exceptionally manipulative? A precise  
 19 question in order to gain a proper answer.  
 20 MR ARMSTRONG: I rely on all of those as going to  
 21 exceptionality.  
 22 JUDGE LUCRAFT: Yes. You are looking at his offending  
 23 history, the offence which has led to him being there,  
 24 and the fact of — the thing I'm not clear about is  
 25 whether you are also saying it is exceptional that his

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1 period — the time he's about to be released is coming  
 2 up, because Governor Styles has said a couple of times  
 3 that actually the period he's dealing with, he knows  
 4 when he's likely to be released is not that far ahead in  
 5 the future.  
 6 MR ARMSTRONG: Yes, and I was about to break that down for  
 7 you.

8 The circumstances are, as he approaches release, he  
 9 is still high risk category A, so 0.1%, the top 0.1% of  
 10 the adult male prison population. He is very unusually  
 11 going to be released. He is going to be released in  
 12 circumstances where he is going to continue having  
 13 a relationship with this programme, and there are other  
 14 factors including concerns about him false-complying,  
 15 about his deception in that respect, and there are  
 16 concerns that he is going to return to his old ways,  
 17 which means terrorism.

18 Now, the cumulation of all of that means, whether  
 19 he's exceptional or not in this sense in 2017 when he  
 20 goes on to Learning Together, he's massively  
 21 exceptional, isn't he, come November/December 2018?

22 A. It depends on which aspect of exceptional that you're  
 23 asking me to answer.

24 So what I can say is, the fact that he was being  
 25 released from Whitemoor via Woodhill as a high risk

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1 category A prisoner, that was exceptional, yes.

2 Q. But all of those things taken — so I get to exceptional  
 3 on that thing alone, but taking those other factors  
 4 together, that's why I used the word "Astonishingly  
 5 exceptional", because I'm now accumulating it with  
 6 another three or four factors; do you see?

7 Do you accept from me that in those circumstances he  
 8 needed — I'll take this in stages — he needed very  
 9 careful, very well calibrated, structured  
 10 decision-making and risk management and thought?

11 A. I accept that.

12 Q. And he needed that — do you accept that he needed that  
 13 not just about custody, but he particularly needed it as  
 14 he was going out into the community?

15 A. I believe we had a duty to do everything that we could  
 16 within HMP Whitemoor to reduce the risk of Usman Khan  
 17 offending after release. Part of that was to do all we  
 18 could to develop the protective factors that were  
 19 emerging, and a part of that was Learning Together. So  
 20 having subsequently looked at the MAPPA documentation  
 21 and the ERG documentation, I recall that reference is  
 22 made to risk factors related to unemployment and  
 23 boredom.

24 Q. Yes.

25 A. So I understand the point you are making, but at the

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1 stage in time we were talking about prior to his  
 2 release, I would suggest that there was a rationale  
 3 around his engagement with Learning Together, and his  
 4 continued engagement with Learning Together after  
 5 release, although I would add, after his release from  
 6 custody, he went from my supervision to the supervision  
 7 of others in the community.

8 Q. Let me see if I can lighten it slightly: he does need  
 9 hard-headed, structured, complex, balanced risk  
 10 assessment generally?

11 A. Yes.

12 Q. You accept you can't silo it off, you are contributing  
 13 to that to the extent that you can?

14 A. Yes.

15 Q. And there's a particular role for the prison in that,  
 16 isn't there, because you know him because he has been  
 17 with you for the last couple of years?

18 A. Well, our role is to do everything that we reasonably  
 19 could to work with Usman to — we knew he was going to  
 20 be released on 24 December, we had no discretion on his  
 21 release date —

22 Q. I understand that.

23 A. — we had to do all we could to reduce the risk he  
 24 presented after release. Learning Together, we felt,  
 25 was part of that process.

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1 Q. My final question is, I'm going to go through a few  
 2 things now, just so everybody doesn't get carried away,  
 3 I'm going to be a little bit longer, but I want to look  
 4 at whether or not there was that hard-headed sober  
 5 decision-making in relation to Mr Khan from you, and  
 6 your contribution to it, after his release.

7 Can I just start, first of all, with when he comes  
 8 out, there is a discussion about going to one event at  
 9 Cambridge in January 2019, but that is declined, but he  
 10 then — and then there is the March 2019 event, again  
 11 declined, but he makes — there is then a video and  
 12 a research interview at that stage; are you aware of  
 13 those things?

14 A. Yes.

15 Q. And then June 2019, however, he goes back to Whitemoor,  
 16 and I want to just focus on that because I think you  
 17 were at that event?

18 A. I was.

19 Q. Can I just look at, there were some photographs taken at  
 20 this event, and Mr Khan getting a Chromebook. Can  
 21 I just go back to some of these? These are  
 22 Learning Together documents that show Mr Khan  
 23 {DC6695/95}, please. Now, I'm not suggesting these are  
 24 your documents. This is Ruth Armstrong to Kenneth  
 25 Skelton, but it's just an illustration of what's

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1 happening in June 2019:  
 2 "Hi Kenneth  
 3 "Just following up on this and your call earlier  
 4 with Amy..."  
 5 Then third paragraph:  
 6 "Am sending the pictures we took yesterday to Lisa  
 7 now, who will edit them and send one to you and Calum  
 8 for your revision ahead of using it on a story about  
 9 what we have done with the money we raised through  
 10 Running Together."  
 11 Okay, so this is part of the Learning Together  
 12 programme and they've got some pictures to be used to  
 13 show that sponsorship money is being used properly; all  
 14 right?  
 15 A. Yes.  
 16 Q. If we then go to {DC6695/98} you see more on this,  
 17 Kenneth and Calum, so that is Kenneth Skelton of  
 18 probation and Calum of Staffordshire Police. Then we  
 19 see at the bottom of that page:  
 20 "As promised, I have attached a picture Lisa has  
 21 edited and some examples of the kinds of stories we like  
 22 to produce for the use of the money from the fund that  
 23 paid for the Chromebook."  
 24 So they again want to show: look at the good work  
 25 we've done, that's why we should have the sponsorship

1 money. Now we go to {DC6695/101}, please. This is then  
 2 the picture that they are helping to use and they want  
 3 to use the story, and that is Usman Khan with his  
 4 Chromebook on Learning Together documentation; you've  
 5 seen that before?  
 6 A. I haven't seen that specific photograph, but yes.  
 7 Q. You can see the enthusiasm they have for wanting to show  
 8 this as a story and as a good news story saying: look,  
 9 we're providing laptops for prisoners?  
 10 A. Chromebooks, yes.  
 11 Q. Chromebooks. Okay.  
 12 Now also in June 2019, around the time of that  
 13 event, and I'm going to suggest to you that this is all  
 14 quite celebratory and enthusiastic, we have this. Can  
 15 I have up, this is the Metropolitan Police's  
 16 investigation report, Bemadam report, can I have  
 17 {DC6502/31}, please.  
 18 Now, Mr Styles, you are at that event, yes?  
 19 A. The Chromebook event?  
 20 Q. Yes.  
 21 A. Yes.  
 22 Q. And Bemadam records a conversation that it attributes to  
 23 you, and we'll come on to this in a moment, but this  
 24 attributes a conversation between you and somebody  
 25 called Julia Nix who is involved in trying to find Usman

1 a job in the community at this stage. If we look at  
 2 paragraph 4.62 {DC6502/30} and expand that, please:  
 3 "Khan also met Julia Nix, Department of Work and  
 4 Pensions, at the event and spoke about the difficulties  
 5 he was having in finding employment. Julia sits on the  
 6 Norfolk Rehabilitation and Re-offending board and works  
 7 with prisons to get prisoners back into work. Khan  
 8 explained how he had turned his life around with the  
 9 learning from Learning Together and was now looking for  
 10 work, but was struggling to do so. The prison governor  
 11 told Julia that Khan was a completely reformed prisoner  
 12 and welcomed her help to get Khan a job. Julia  
 13 volunteered at the meeting to personally help Khan find  
 14 a job."  
 15 Is that you?  
 16 A. I would have to go back to the attendee list, which  
 17 I have seen at some stage, but I believe it may not have  
 18 been me. I believe at that stage I had moved on to  
 19 another post, or it may be that Julia believed that  
 20 I was still the governor because I was at that event.  
 21 Q. Do you remember -- well, it says at the end of that.  
 22 The police say:  
 23 "It is believed the prison governor Julia spoke to  
 24 is Will Styles who is the prison governor of HMP  
 25 Whitemoor and who is listed as attending the event."

1 Do you have a recollection of speaking to Julia Nix  
 2 at that event?  
 3 A. I may have.  
 4 Q. You may have. Is it fair to say that you may have had  
 5 to conversation that says: he is a completely prisoner,  
 6 can you get him some help finding a job?  
 7 A. I don't recall that conversation, but I may have.  
 8 Q. Could I suggest to you that you did, and also that using  
 9 that language, "completely reformed prisoner", as  
 10 a prison governor at a high risk category A is  
 11 completely inappropriate in circumstances where the last  
 12 structured risk assessment is the ERG and the OASys  
 13 which says he is essentially unreformed? Would you  
 14 accept that?  
 15 A. I am not -- I don't recognise "completely reformed" as  
 16 language I would have used in that context, but what  
 17 I accept is, if Julia Nix had been at that event, and  
 18 she was, having known her for some time, I would have  
 19 spoken to her, and I think it's quite possible I had  
 20 a conversation with her in which Usman was at that  
 21 event, I indicated that I thought that he was a reformed  
 22 character, and any support we could get or he could get  
 23 in securing a job would be a good thing --  
 24 Q. Could we just have up her witness statement --  
 25 A. -- which it would have been.

1 Q. Could we have up her witness statement, {WS0369/1}, so  
 2 this is Julia Nix, this is a witness statement she  
 3 gives, fairly contemporaneously, it's 19 December 2019,  
 4 and if we go, I think it's the bottom of this page, she  
 5 says this:  
 6 "I volunteered at the meeting to personally help  
 7 Usman get a job and at the end of the meeting  
 8 I witnessed Khan greet one of the prison governors at  
 9 Whitemoor."  
 10 So you know each other. If it's you, this is  
 11 a greeting:  
 12 "The way they greeted one another, led me to believe  
 13 they knew each other well from before. As I approached  
 14 them, the prison governor said to me 'Usman Khan is  
 15 a completely reformed prisoner and if you could help him  
 16 get a job he would be very grateful'."  
 17 Now, Julia Nix has got a clear recollection of that,  
 18 she is giving it on 19 December which is relatively  
 19 contemporaneously and in the circumstances where this  
 20 atrocity has just happened, so presumably she wants to  
 21 be accurate, and she's using that language very  
 22 precisely. You did use that language, Governor Styles,  
 23 to her?  
 24 A. My recollection is such that I can't refute that and  
 25 I would have to ask you to speak to Julia Nix about it,

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1 but I would say two things: I didn't know Mr Khan  
 2 particularly well, which does leave some doubt in my  
 3 mind as to whether it is actually me that was being  
 4 referred to.  
 5 Q. All right.  
 6 A. And I'm not sure, I think, if you review the attendee  
 7 list, I was not the prisoner governor at Whitemoor at  
 8 that point.  
 9 Q. But you were at the event?  
 10 A. I was at the event.  
 11 Q. And you would have spoken to Julia Nix and you may have  
 12 said it?  
 13 A. I may have said that Usman Khan is a reformed character,  
 14 or words to that effect.  
 15 Q. All right, let's look at some other examples of language  
 16 that may be -- first of all, do you know at this point  
 17 in 2019, have you read the ERG or the OASys?  
 18 A. No.  
 19 Q. Would you agree that if you don't know those key  
 20 documents, and what they say about a complex man, you  
 21 shouldn't be expressing a view at all?  
 22 MS LEEK: Sir, I hesitate to interrupt again but we're going  
 23 to be hearing from Julia Nix next who will give  
 24 a description of the person --  
 25 JUDGE LUCRAFT: Yes.

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1 MR ARMSTRONG: That's fine.  
 2 MS LEEK: -- that she thought she was talking to and before  
 3 we go down the route of: you shouldn't have said this  
 4 and might you have said it, perhaps we will hear who --  
 5 that description.  
 6 JUDGE LUCRAFT: I was going to ask Mr Armstrong if he can  
 7 simply put the attendee list up because that may help  
 8 cure some of these issues. I am conscious --  
 9 Mr Armstrong, I'm not saying you can't look at this  
 10 area, but I am just conscious that the witness has made  
 11 it very clear, first of all, that he may not be the  
 12 governor that is being referred to, and in fairness to  
 13 him, he ought to have a chance to see that document.  
 14 MR ARMSTRONG: I'm happy, I don't have the reference for the  
 15 attendee list.  
 16 JUDGE LUCRAFT: I'm sure somebody, it looks like Mr Rule.  
 17 MR RULE: {DC6695/78} to {DC6695/79}.  
 18 MR ARMSTRONG: I am grateful to Mr Rule, I think that was  
 19 page -- 6695, page...?  
 20 JUDGE LUCRAFT: 78.  
 21 MR RULE: (off-microphone -- inaudible).  
 22 JUDGE LUCRAFT: I think if we go to the next page.  
 23 MR ARMSTRONG: So that has you down, confirmed attendee,  
 24 "Will Styles -- Governor, HMP Whitemoor."  
 25 A. Okay.

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1 Q. So that may be how you're described?  
 2 A. Yes.  
 3 Q. Did you have a name badge that has that on it, possibly?  
 4 A. Yes.  
 5 Q. Which may be why she thinks it's you?  
 6 A. Yes.  
 7 Q. And if we just look on that list briefly, there's nobody  
 8 else with the title "Governor" on that list.  
 9 A. It was the date of the meeting which I wasn't entirely  
 10 clear of.  
 11 Q. All right. I mean, the question I'm just actually  
 12 putting to you is, and I'll deal with Julia Nix as to  
 13 whether it is you, but you're accepting, I think, that  
 14 it may have been, if you express in that capacity, as  
 15 head of -- as a governor of a high security jail, that  
 16 they -- use the word "completely reformed", they are  
 17 likely to take that seriously?  
 18 A. Well, I would say I think there's a danger of  
 19 misrepresentation, or at least a slight unfair  
 20 representation of that conversation, if it took place.  
 21 I'm not sure I would have used the terminology  
 22 "completely reformed", but what I would say is  
 23 Usman Khan had had a prison experience in which the  
 24 majority of the beginning of his time was difficult and  
 25 challenging, which I'm sure you've already encountered.

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1 He came to Whitemoor on the MCBS programme, which  
 2 I'm sure you've already talked about, as a very  
 3 challenging prisoner, and by the time he left, he had  
 4 engaged with the Learning Together, and a few months  
 5 after his release, this very difficult challenged person  
 6 was actually coming back to a prison attending an event  
 7 in a very, very positive narrative. So if I had  
 8 a conversation with Julia Nix, I don't think it would  
 9 have been completely unreasonable or outrageous to say,  
 10 to make reference to somebody being a reformed  
 11 character.  
 12 Q. But not "completely reformed"? Somebody outside is  
 13 going to --  
 14 A. I cannot confirm that I used "completely reformed".  
 15 Q. I'll move on from this. I want to look at -- to be open  
 16 with you, what I'm putting to you is that some of the  
 17 language that you used or may have used would be  
 18 inconsistent with hard-headed, sober risk assessment of  
 19 this man even after release, okay, just so you know  
 20 where I'm going to that.  
 21 A. If you're referring to the conversation I had with  
 22 Julia Nix, I would say again, relatively speaking,  
 23 a TACT offender who had been through several years of  
 24 difficult prison experience who then came to Whitemoor  
 25 and, relatively speaking, improved significantly, and

1 then several months after his release came back to the  
 2 prison in a really positive context, in a really engaged  
 3 and positive optimistic context, I don't think it is  
 4 unreasonable to use terminology about somebody being  
 5 reformed. That's a relative term.  
 6 Q. Anything you say at about this time is based on your  
 7 understanding of prison. You don't know what he's done  
 8 in the community?  
 9 A. That is true.  
 10 Q. Let me just look at some other examples of your  
 11 language, or things that might be your language, let me  
 12 be clear that it is not completely clear in some of  
 13 these cases. Can I have {DC6719/1} up, please, this is  
 14 more Learning Together materials, and can I go to  
 15 {DC6719/72}. This is an application, and I think it's  
 16 a draft, I don't expect you to know, and others can  
 17 comment on it, but I'm going to put to you that it may  
 18 be a draft for an application for an award from --  
 19 called the Robin Corbett award from the Prison Reform  
 20 Trust. This is an application form:  
 21 "Please use as much space as you need to fully  
 22 answer the questions and note word limits when  
 23 specified".  
 24 And this, I think, is completed by Learning Together  
 25 but, as you will see if we go to the second half, it

1 contains a quote from you which says:  
 2 "Will Styles, Governor, HMP Whitemoor".  
 3 I'm just going to read this:  
 4 "In their work in a high security prison, the course  
 5 directors for Learning Together, Drs Amy Ludlow and Ruth  
 6 Armstrong, have focused their efforts on partnering with  
 7 the establishment to deliver an inclusive learning  
 8 environment that brings together students from inside  
 9 and outside of the prison walls, in a wide-ranging  
 10 assortment of courses. The primary focus at all times  
 11 has been to develop learning environments and cultures  
 12 that are inclusive, challenging, supportive and  
 13 enjoyable, increasing opportunities for active  
 14 citizenship and contributing towards individuals'  
 15 pathways to desistance."  
 16 And then this:  
 17 "However, the unusual circumstances of the imminent  
 18 release of a high risk offender have presented  
 19 opportunities to reflect upon engagements that have  
 20 contributed towards enabling students to prepare to go  
 21 out into the community and make positive contributions  
 22 to it. The testimonials below from an individual  
 23 Learning Together student who will shortly be released  
 24 and his offending supervisor highlight that one of the  
 25 strongest contributors in this individual's

1 transformation has been his engagement with the  
 2 Learning Together programme..."  
 3 Et cetera, and then it quotes the offender  
 4 supervisor in language similar to that which we have  
 5 heard from Jo Boulton yesterday.  
 6 Now, can I just unpick that a bit. That is talking  
 7 in the context of an award, so seeking money from the  
 8 Prison Reform Trust, it is using Khan's imminent  
 9 release, and then we'll see from other bits of this it's  
 10 Khan, and then it says it regards that as being  
 11 an opportunity to show what Learning Together has been  
 12 able to achieve, and because it's so good, you should  
 13 give us some money, that's what that means. Is that  
 14 your language; did you give them that quote?  
 15 A. Yes.  
 16 Q. Mr Styles, this is a man -- this is written around the  
 17 time of, I think, February 2019, so only two months  
 18 after he has been released, and this is a man who is  
 19 still assessed as being an imminent risk of very serious  
 20 harm. He is hugely risky, and this is you using,  
 21 I'm going to suggest to you, very giddy language about  
 22 how successful he has been and what an exciting prospect  
 23 his release is, isn't it?  
 24 A. And I believe it. I stand by --  
 25 Q. You stand by that language?

1 A. I stand by the spirit of that statement.  
 2 Learning Together --  
 3 Q. Do you think --  
 4 A. Sorry, I interrupted you.  
 5 Q. Yes.  
 6 A. Learning Together, or Mr Khan's engagement with  
 7 Learning Together, I believe the MAPPA and the ERG  
 8 documentation, which I'm sure you have already seen, has  
 9 demonstrated that that did more, probably, than anything  
 10 else in his time at Whitemoor to start developing  
 11 factors, protective factors, that might encourage him to  
 12 desist and disengage from extremist attitudes and  
 13 behaviours.  
 14 So I think, based on the information we had then --  
 15 obviously at that stage the tragic events at  
 16 Fishmongers' Hall hadn't occurred -- the  
 17 Learning Together interaction with Usman Khan at that  
 18 point I absolutely felt that it had been a very, very  
 19 positive engagement.  
 20 Q. A very positive engagement for Usman Khan, in the  
 21 context of his release into the community?  
 22 A. Based on the information we had at that point, I think  
 23 it was reasonable to conclude that Learning Together had  
 24 been a very, very positive experience in developing  
 25 protective factors for Mr Khan?

1 Q. He is, at this stage, still a very high risk of imminent  
 2 harm. He's very high risk, in OASys terms?  
 3 A. Are we talking about February --  
 4 Q. 2019, yes, I mean, he's still assessed as being -- we've  
 5 got an 27 December 2018 OASys to that effect, so he's  
 6 still a very high risk of harm?  
 7 A. He was still in prison at that stage but I'm not  
 8 disputing what you're saying.  
 9 Q. Yes, but two months later he will be the same  
 10 presumably?  
 11 A. Yes.  
 12 Q. And the ERG has fed into that, which also contains a lot  
 13 of concerning things. Do you think it's appropriate to  
 14 be celebrating in this kind of language that kind of  
 15 opportunity, that kind of process and the opportunity it  
 16 has for Learning Together when what is needed for  
 17 somebody like him is hard-headed, sober risk analysis?  
 18 Do you think you're helping with that kind of language?  
 19 A. The Fishmongers' Hall attack, which was terrible, had  
 20 not occurred at the point that nomination was submitted.  
 21 What I can tell you is, that comment, those comments,  
 22 accurately reflect my feelings about Learning Together  
 23 at that point, which were hugely positive. I felt it  
 24 had made a hugely positive contribution to Mr Khan and  
 25 other prisoners at Whitemoor.

1 Q. All right, can I go to another example of something that  
 2 you have said. Can I go to your witness statement,  
 3 please, {WS5010/4}, paragraph 11, and again this is all  
 4 in the context of trying to bring about hard-headed  
 5 security-orientated, safe assessment, at the bottom here  
 6 you talk about -- in this paragraph you're talking  
 7 about, and you're expressing again your enthusiasm for  
 8 this programme. You say:  
 9 "Cambridge students... the feedback I received ...  
 10 simply amazing. External students considered it a  
 11 privilege to work with people from such different  
 12 backgrounds, and the prisoners described it as a huge  
 13 source of hope for them and confidence that they could  
 14 learn and accomplish academic achievements and be  
 15 something better than criminals. Learning Together  
 16 brought hope, respect and unique opportunities to men at  
 17 HMP Whitemoor and it played a meaningful role in  
 18 creating a safer and more hopeful prison."  
 19 Then you cite in support of the importance of this:  
 20 "In 2017 I carried out research at HMP Full Sutton,  
 21 HMP Long Lartin and HMP Whitemoor [all category A  
 22 prisons] as part of a dissertation for my master's  
 23 degree. The topic of the research was hope. In my  
 24 interviews with approximately 30 prisoners, one of the  
 25 activities that was most mentioned as giving them hope

1 for the future and relief from the demotivating despair  
 2 associated with serving 18-40 year sentences, aside from  
 3 family contact, was taking part in Learning Together  
 4 activities ."  
 5 Now, I just want to suggest to you that we get  
 6 plenty of this lofty language from Learning Together.  
 7 What we need from you, as the governor of the prison,  
 8 Mr Styles, is some hard-headed reality that says: but  
 9 he's also potentially very dangerous. Is you writing  
 10 dissertations about hope and this sort of matter  
 11 consistent, do you think, do you think it helps bring  
 12 that discipline to bear on this difficult subject?  
 13 A. That is a statement of fact. I did carry out that  
 14 research. Those were the findings.  
 15 Q. Mr Styles, Amy and Ruth needed reining in, I suggest to  
 16 you, they needed a reminder of the harsh realities of  
 17 what they were dealing with, and the person best placed  
 18 to provide that, was you, but instead you're off writing  
 19 a master's degree thesis on hope.  
 20 A. Is that a question?  
 21 Q. Yes. I'm saying it's not appropriate.  
 22 A. I still don't understand the question, I'm sorry.  
 23 Q. Do you accept that this wasn't appropriate? Do you  
 24 accept that this isn't helpful to hard-headed risk  
 25 analysis?

1 A. I'm not seeing that this is contrary to hard-headed risk  
2 analysis. I think research, information and knowledge  
3 on motivation for prisoners is very relevant to managing  
4 their risk in a custodial environment and helping reduce  
5 their risk after release, so I'm not sure I do agree  
6 with your point, I am afraid.

7 Q. Can I just ask you about this on the research you did.  
8 I think you were the governor of Whitemoor at the time  
9 that you did this research?

10 A. Yes.

11 Q. And you went around the high security estate of which  
12 you are now the deputy director?

13 A. I didn't go around it, I went to three establishments as  
14 I think is outlined in paragraph 11 of the document in  
15 front of you.

16 Q. Well, that's half of the estate, isn't it, because  
17 there's six?

18 A. Well, it's three establishments.

19 Q. And you asked high security prisoners, you as a governor  
20 go around and ask high security prisoners whether hope  
21 is important to them, and they say "Yes"?

22 A. I didn't carry out the research as — although I was  
23 a governor, I did it in a research capacity, and that  
24 was made clear to the prisoners engaging.

25 Q. But they would have known who you were?

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1 A. Some of them would have, yes.

2 Q. And you asked them whether the programme, which you are  
3 championing, is contributing to their hope, and they say  
4 yes to that too?

5 A. No, I think that's a misrepresentation. The research  
6 was primarily focused on understanding what the concept  
7 of hope means to category A prisoners, and asking them  
8 to identify the factors that develop hope or extinguish  
9 it, and the important of that for me was two-fold: one,  
10 to understand how prisoners psychologically survive the  
11 experience of a 40-year prison sentence, and two, to  
12 understand how hope can be built or extinguished in the  
13 context of release and reducing risk.

14 Q. All right. Let me just see if I can speed up a bit.  
15 Can I just put a couple of other references. Can I have  
16 {WS0444A/3} up, please.

17 Then page 3, this is Amy Spolton, can I go to the  
18 bottom of this, please. We have heard of her before,  
19 she is part of Fishmongers' Company, she is at an event  
20 in April 2019 where she meets people including you and  
21 they talk about the work that they were doing, she was  
22 struck by how enthusiastic Gina Butler and Will Styles  
23 were. So again, you are spreading your enthusiasm  
24 around, including now to Fishmongers' Hall; do you  
25 accept that?

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1 A. Absolutely.

2 Q. In November 2016, so this is only a month after you  
3 became governor, you write this document. Can I have  
4 {DC6505/1} up, please. This is the notice to colleagues  
5 which starts this, and you will see your name at the  
6 bottom left-hand corner.

7 A. I didn't write it.

8 Q. Okay, but you've got —

9 A. That was written by Gina Butler. It's just a process of  
10 communicating, they are notices to staff and to  
11 prisoners. In order to have some governance around that  
12 those notices are approved by and signed off by the  
13 governor, but I didn't write it.

14 Q. But you presumably agree with the contents, or?

15 A. I did.

16 Q. And if you go to the second page of this, this is lots  
17 of very lofty academic language:

18 "Humans are fundamentally ethical, trying to do what  
19 they consider right or good. But what constitutes the  
20 human good? Historically, ethics has been closely tied  
21 to religion and to questions of theodicy and the problem  
22 of evil ... the idea of bringing together people in  
23 universities and criminal justice organisations to learn  
24 from each other has a long history in the UK."

25 Et cetera. This is all Learning Together language

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1 and you happily sign up to it?

2 A. Yes.

3 Q. Lots of religious language. Can I just check a point on  
4 that, please. Next page. {DC6505/3}. This is then  
5 a session that goes on about this which is to take place  
6 in January, can I just check this —

7 A. Could I just interject and say and that is, of course,  
8 part of the relevance of the discussion about Usman Khan  
9 being able to engage in these sorts of programmes given  
10 his background.

11 Q. All right. Can I just check this, just in case anybody  
12 is confused about this, there is a religious element to  
13 this, but I am assuming that the session on Wednesday 25  
14 January on empathy is not delivered by the former  
15 Archbishop of Canterbury, but is delivered by somebody  
16 called Ryan Williams, not Rowan Williams.

17 A. I don't recall.

18 Q. Because there is a Ryan Williams referred to in the text  
19 there as well, before he gets dragged into this.

20 You see what I'm putting to you, Mr Styles, is that  
21 where this gets to, there's been some discussion in  
22 these proceedings about Usman Khan being used as a good  
23 news story for Learning Together and I'm putting to you  
24 that all of this gets a bit giddy and loses its way on  
25 the hard-headedness and you contribute to that. That's

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1 what I'm putting to you. Do you accept that criticism?  
 2 A. I don't.  
 3 Q. Can I use this expression as well, because where it gets  
 4 to is this: can I have document {DC7490-T} --  
 5 JUDGE LUCRAFT: Just before we do, I'm just conscious of the  
 6 time, Mr Armstrong, because we've got another witness to  
 7 get through and I think you have overshot your time  
 8 estimate by quite some distance.  
 9 MR ARMSTRONG: I've lost my gold star, haven't I?  
 10 JUDGE LUCRAFT: I think you have probably lost them both  
 11 actually, but there we are. As I say, I'm conscious  
 12 there is material you can put to Mr Styles, but I think  
 13 we have got the thrust of the point you are making, so  
 14 if I could ask you to draw your matters to a --  
 15 MR ARMSTRONG: Yes, there are just two references I should  
 16 put, firstly, can I just do {DC7409-T/23} and can we go  
 17 to page 23 of this, please. There has been some  
 18 discussion about where this comes from because  
 19 Learning Together denied this when it was put to them.  
 20 If we go to the second half of this, please  
 21 {DC7490-T/23}. This is the special branch -- I don't  
 22 think this is the right entry. Can I have the... oh  
 23 yes, it is right.  
 24 This is an entry from DC Stephenson, who we will  
 25 hear from in a week or so's time, a couple of weeks'

1 time, and he is talking about the June 2019 event. Now,  
 2 we don't know where he has got this from and we will  
 3 have to ask him about that, but do you see about eight  
 4 bullet points down:  
 5 "[Cambridge University] -- Learning '2gether  
 6 programme' HMP Whitemoor 12/6/19 ... tech stakeholder  
 7 [event]".  
 8 That's what that is. Then he is referred to as  
 9 "poster boy". So that's where we've got to, that's  
 10 where he's now being seen as a poster boy, and you can  
 11 see why, can't you?  
 12 A. Yes, I can.  
 13 Q. He is being used for grants and applications?  
 14 A. Well, what I would say is, Learning Together had been  
 15 a hugely positive experience for HMP Whitemoor and the  
 16 prisoners, and at that point in time, I think it's  
 17 reasonable to say that Usman Khan had been seen as  
 18 a success story. I wouldn't use the term "Poster boy".  
 19 Q. But success story?  
 20 A. A success story, yes. At that point in time.  
 21 Q. And you've got the point I'm putting about losing  
 22 hard-headedness. Can I just finally show you this --  
 23 A. Sorry, I did make the point that I don't agree with the  
 24 point about losing hard-headedness --  
 25 Q. I know you don't.

1 A. -- if I could just say, I was enthusiastic about  
 2 Learning Together, I'm enthusiastic about any  
 3 opportunity we can bring into a prison which helps men  
 4 rehabilitate and reduce the risk of re-offending after  
 5 release, because most of those men at some point will be  
 6 living in your city, your town, your street, so we have  
 7 a duty to do all we can to help change their lives.  
 8 Q. But it has to be done very carefully?  
 9 A. It has to be done carefully, but it also has to be done  
 10 with enthusiasm and commitment and drive and energy  
 11 because it's very difficult --  
 12 Q. They get that from Learning Together, Mr Styles; what  
 13 they need from you is hard-headed reminders that there's  
 14 great risks being taken; do you see?  
 15 A. Well, I am --  
 16 Q. And I'm suggesting this language doesn't help.  
 17 A. -- I understand the assertion you're making, but if you  
 18 are asking me to agree with you, I would have to think  
 19 about that.  
 20 Q. One last point, just to show how you tend to get  
 21 regarded in that role, {DC6384/1}, this is just a small  
 22 example of how security gets lost, and if you just --  
 23 I need to see where the email is. This is an email from  
 24 Ruth Armstrong to somebody called Peter Atherton. You  
 25 can see from the email, we don't know who that is:

1 "Hi Pete  
 2 "Thanks for this. Think Amy and I said we can't  
 3 make this one..."  
 4 But he is somebody who wants to go to Whitemoor.  
 5 And Ruth says to him:  
 6 "... we need to get your full name, date of birth  
 7 and [National Insurance] number for Whitemoor..."  
 8 And those are presumably somebody else:  
 9 "We need this ASAP in order to get you into the  
 10 prison. We might also need full offence histories ... we  
 11 will ask the governor before offering this of course [so  
 12 they won't offer it up, but they will ask you about it]  
 13 but they may still ask for it. Governor is Will Styles,  
 14 second year MSt, so I think you'll be fine."  
 15 So this is Ruth saying: you may not need to give  
 16 your offending history because we know the governor, he  
 17 is one of us, he is on our academic course, so it will  
 18 all be fine. That is a small example, but nevertheless  
 19 a significant one, of security being lowered in the  
 20 context of all of these slightly giddy relationships?  
 21 A. Could I respectfully request that you explain to me who  
 22 this email is to and who it's from and what it's with  
 23 regard to?  
 24 Q. I don't know who that is, but I'm not sure I need to,  
 25 because it is an email that speaks for itself from Ruth

1 Armstrong and its the description of you rather than to  
 2 whom it goes that matters. It's a security matter and  
 3 it 's saying: don't worry about it because Will Styles is  
 4 one of our students on the MSt, so I'm sure it will be  
 5 fine.  
 6 A. Firstly, I'm still not clear who it's to and who it's  
 7 from, so it's difficult to comment on, but I would say  
 8 you're choosing an interpretation of that email which  
 9 may not be correct, because another interpretation of it  
 10 might be that: the governor is Will Styles, second year  
 11 MSt, so we have that relationship and an understanding  
 12 of the agenda.  
 13 MR ARMSTRONG: Thank you, Governor Styles, I have no further  
 14 questions.  
 15 A. Thank you.  
 16 MR HOUGH: Now, just before anyone else speaks, we now have  
 17 an hour.  
 18 JUDGE LUCRAFT: Yes.  
 19 MR HOUGH: I'm keen to get through Ms Nix, she has been  
 20 brought a long way, and her evidence is of limited  
 21 scope. Everyone will have to trim their estimates  
 22 a little after that.  
 23 JUDGE LUCRAFT: Thank you.  
 24 Questions by MR RULE  
 25 MR RULE: Mr Styles, my name is Philip Rule, I ask questions

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1 on behalf of Saskia Jones' family.  
 2 A. Hello, sir.  
 3 Q. I will be very short. There are four topics that I want  
 4 to cover, there should be no more than a couple of  
 5 questions on each.  
 6 The first is, you told us about the high security  
 7 prison of which you were a governor, at Whitemoor,  
 8 having a very high Muslim population, something over  
 9 40%. It's right that that meant that it was impossible,  
 10 as the system that you were dealing with, the facilities  
 11 you've been provided with, to actually keep the TACT  
 12 offenders, the terrorist offenders, away from one other;  
 13 it was just a physical impossibility?  
 14 A. It was certainly a challenge, yes.  
 15 Q. You couldn't, could you? Other witnesses have said  
 16 that, I would just like you to agree with a simple  
 17 point, if you can?  
 18 A. Yes, I agree.  
 19 Q. Yes. And that's why they weren't kept apart, wasn't it?  
 20 A. Yes.  
 21 Q. Thank you. There was also, I hope you will agree,  
 22 a significant problem with gang culture inside the  
 23 prison of an extremist Muslim nature?  
 24 A. Yes.  
 25 Q. Within the prison, it was, however, known who were the

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1 people pulling the strings in those gangs?  
 2 A. Well, we don't know what we don't know, but we had  
 3 significant intelligence and our systems were quite good  
 4 at identifying risks as they emerged, so yes.  
 5 Q. Thank you very much.  
 6 Second topic, there was at no stage in your  
 7 involvement with Learning Together a discussion about  
 8 you offering advice or any one of your organisation  
 9 within the prison offering advice on security for  
 10 external purposes to Learning Together?  
 11 A. For people coming into the prison from outside, or us  
 12 sending staff out to other agencies on the outside?  
 13 Q. I have taken for granted -- I'll make the question  
 14 clearer, sorry -- I've taken for granted that the  
 15 consideration of risk, according to your statement  
 16 paragraph 8, was all about the classroom inside the  
 17 prison. That was the security concerns of the prison  
 18 about running it inside.  
 19 We now know that Learning Together has this external  
 20 continuation, and my question to you is, were you asked  
 21 at any stage, or did you offer, advice about ongoing  
 22 security outside Whitemoor after Whitemoor?  
 23 A. After prisoners had been released from Whitemoor?  
 24 Q. Indeed.  
 25 A. No.

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1 Q. Thank you. The third topic, please, is just very  
 2 briefly to return to the discussions you were telling us  
 3 about from your witness statement, paragraph 9, which  
 4 were these ongoing discussions with Ruth Armstrong,  
 5 Amy Ludlow, yourself, and Steve Machin and Gina Butler,  
 6 those are the names that you give.  
 7 Now, your role in the prison was strategic  
 8 leadership as governing governor?  
 9 A. Yes.  
 10 Q. You would not, certainly, discuss every prisoner's  
 11 application for employment or activities, would you,  
 12 personally?  
 13 A. No.  
 14 Q. But you were personally involved in these ones?  
 15 A. I was. In this one.  
 16 Q. In this one, sorry.  
 17 A. Yes.  
 18 Q. In this discussion over time with the individuals about  
 19 Mr Khan.  
 20 Now, related to that, please, within the  
 21 discussions, you mentioned public perception in your  
 22 witness statement. Is another way of talking about that  
 23 reputational issues?  
 24 A. Yes, partly, and public acceptability, because -- well,  
 25 certainly the Prison Service and partially

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1 Learning Together, we provide a service on behalf of the  
 2 public, so we always have to be mindful about public  
 3 acceptability and trying to ensure that decisions we  
 4 make are generally compatible with what's the right  
 5 thing, given that we serve society.  
 6 Q. Thank you. And within the discussions, there were  
 7 concerns about a focus on the risk involved, of  
 8 involving Mr Khan, and of safeguarding students. So  
 9 there were concerns raised about risk in the course of  
 10 discussions?  
 11 A. Yes.  
 12 Q. Can you tell me how keen Amy and Ruth were that he  
 13 should be allowed to be participating?  
 14 A. I can tell you that Ruth and Amy were at every point  
 15 very, very mindful and respectful of security  
 16 considerations. My recollection is that they were  
 17 supportive of the idea of Usman joining the programme.  
 18 Q. And finally, I ask you, please, about documenting the  
 19 process, because I understood your answer earlier to be  
 20 some things are business as usual, some elements aren't,  
 21 et cetera, et cetera. I wasn't very clear about where  
 22 we stood on this particular process.  
 23 So as far as this process is concerned, what we're  
 24 clear about is there is no documentation, it wasn't  
 25 minuted, it wasn't formalised, it wasn't recorded?

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1 A. So any activity in a prison, or certainly in Whitemoor,  
 2 there is a general process of risk assessing the area,  
 3 risk assessing the activity, and risk assessing the  
 4 people --  
 5 Q. Can I cut you short, only because we know all of that,  
 6 so let me just return to my question, we have got the  
 7 context, thank you. My question is, in relation to this  
 8 procedure we're right, aren't we, there is no  
 9 documentation of the discussions about Mr Khan joining  
 10 Learning Together?  
 11 A. Not that I'm aware of.  
 12 Q. Thank you. Now, in other situations, however, there is  
 13 a documented process which doesn't involve you, it's  
 14 delegated to your head of learning and skills,  
 15 Gina Butler, who we've heard from, but that is  
 16 a documented process, isn't it, for certain external  
 17 involvement?  
 18 A. Yes.  
 19 Q. Could we just see that on the screen very briefly, it's  
 20 {WS5092-GB4/1}, please. This is a document that the  
 21 ladies and gentlemen of the jury have seen before, but  
 22 this, I think is what we're discussing, you and I now,  
 23 which is part of the Whitemoor processes here and you  
 24 have departments involved where there is suitability for  
 25 long-term plans and requirements for courses that might

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1 go into a day release or access to IT, other things that  
 2 might be risk-related, and this would apply to any  
 3 external distance-learning and higher learning?  
 4 A. I have to confess, I wouldn't get involved in that level  
 5 of detail.  
 6 Q. Thank you.  
 7 A. So Gina Butler even doesn't work for -- directly to me  
 8 as governor. She would have had a functional head who  
 9 was the head of reducing offending.  
 10 Q. Thank you, and indeed we can see that it is to her, if  
 11 we go down this page, please, that the decisions are  
 12 taken in all of these educational ones. We see HE3  
 13 there:  
 14 "The final decision will then be made by the  
 15 Governor's Appointed Representative.  
 16 "HE3, Approval by Head of Learning and Skills."  
 17 Gina Butler, who reports to the head of  
 18 re-offending, reduce and re-offending. And at  
 19 {WS5092-GB4/12} we can see the way in which this  
 20 document will be signed off. So it is return it to head  
 21 of learning and skills, and we don't need to see the  
 22 rest of the page, but that's the approval side for it.  
 23 So that you wouldn't become involved in, but you're  
 24 aware that that was the process in Whitemoor for higher  
 25 education?

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1 A. To be honest with you, I'm not particularly familiar  
 2 with that level of detail in terms of the process, so as  
 3 governing governor you're physically not able to be  
 4 involved in every activity allocation of every prisoner  
 5 it's a delegated responsibility.  
 6 MR RULE: Thank you.  
 7 JUDGE LUCRAFT: I think that just leaves Ms Leek.  
 8 Questions by MS LEEK QC  
 9 MS LEEK: Hello, Mr Styles.  
 10 A. Hello, ma'am.  
 11 Q. You've been asked questions about a term called  
 12 "astonishingly exceptional"; is this a term that is used  
 13 at all within the Prison Service?  
 14 A. No.  
 15 Q. In fact, within Whitemoor Prison, you have a population  
 16 that is dangerous?  
 17 A. Yes.  
 18 Q. Manipulative?  
 19 A. Yes.  
 20 Q. Dishonest? A lot of them.  
 21 A. Yes.  
 22 Q. Difficult to handle?  
 23 A. Yes.  
 24 Q. And involved in criminality of the most serious order?  
 25 A. Yes, they are the most serious offenders in the estate.

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1 Q. And it is a very difficult balance, is it not, between  
 2 keeping them secure, keeping them hopeful, and giving  
 3 them education and training for some kind of future?  
 4 A. So security is always our primary concern, that is  
 5 always our top priority .  
 6 Q. I was going to come to that.  
 7 A. But we also have to be mindful that most of the  
 8 prisoners at Whitemoor at some stage will be released to  
 9 live in our cities , our towns, our streets , or even next  
 10 door to us. So it's really important that we do have  
 11 some balance in terms of making sure we give people  
 12 a rehabilitative culture to live and work within.  
 13 Q. And you have a number of external providers coming into  
 14 the prison , some voluntary, some not, providing courses  
 15 and activities through which these offenders can further  
 16 themselves and learn skills for the future?  
 17 A. Yes.  
 18 Q. You don't necessarily go behind all of the academic  
 19 research that goes into each one of those courses?  
 20 A. No.  
 21 Q. You have music groups?  
 22 A. Yes.  
 23 Q. You have GCSEs?  
 24 A. Yes.  
 25 Q. You have cookery?

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1 A. Yes.  
 2 Q. You have a number of different types of activity . And  
 3 as we have heard, as far as you were concerned,  
 4 Learning Together played a meaningful role in creating  
 5 a safer and more hopeful prison?  
 6 A. Absolutely 100% yes.  
 7 Q. You say in your statement:  
 8 "I saw for myself how those taking part quickly  
 9 became more respectful of themselves and of others."  
 10 A. It was -- it -- I was really struck by it. Just the  
 11 change in a number of the men who had taken part in it,  
 12 yes.  
 13 Q. They were more willing to listen to the views of others?  
 14 A. Yes.  
 15 Q. And compromise, and they developed skills in  
 16 problem-solving.  
 17 A. That's right.  
 18 Q. You've said in paragraph 12 of your statement:  
 19 "In 29 years of prison work, I do not think I have  
 20 seen a better example of an activity that gives  
 21 prisoners more hope for the future, motivation to  
 22 change, self-respect, and inspiration than  
 23 Learning Together."  
 24 A. And I stand by that.  
 25 Q. And you said that:

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1 "The project at Whitemoor had a really positive  
 2 impact on the men taking part and positively influenced  
 3 the whole prison community."  
 4 A. Once Learning Together got started, it had a -- you  
 5 could really feel the difference in the environment in  
 6 the prison .  
 7 Q. And what you're trying to do is create a safer prison  
 8 environment?  
 9 A. Create a safer prison environment and create  
 10 an environment in which men will be more engaged in the  
 11 activities which ultimately will make them less likely  
 12 to offend after custody.  
 13 Q. Yet Mr Armstrong seems to be suggesting that an entire  
 14 class of prisoners should be excluded from this course.  
 15 Did you see any reason at any point from a risk  
 16 perspective to exclude TACT prisoners from  
 17 Learning Together?  
 18 A. Learning Together was an education activity working to  
 19 education risk assessments, therefore it was the lowest  
 20 level of risk of any activity in the prison, so no.  
 21 Q. And did you see anything for yourself, or were you  
 22 provided with any evidence or intelligence or  
 23 information to discuss that engaging in the  
 24 Learning Together programme might increase the risk that  
 25 a prisoner posed, either within the prison, or upon

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1 release?  
 2 A. Absolutely not.  
 3 Q. Did your support for the course ever undermine in any  
 4 way the security considerations?  
 5 A. No.  
 6 Q. Was the activity risk --assessed in the same way as other  
 7 classroom-based activities?  
 8 A. As far as I'm aware, yes.  
 9 Q. And were prisoners also assessed for their suitability ,  
 10 as we heard from Jo Boulton and Gina Butler?  
 11 A. Yes.  
 12 Q. Were there ever any incidents involving  
 13 Learning Together at HMP Whitemoor?  
 14 A. Not that I'm aware of.  
 15 Q. And was it in fact your view that the course was  
 16 a positive , protective and prosocial factor for many of  
 17 the prisoners who undertook it?  
 18 A. Absolutely, yes.  
 19 Q. Of course we are looking at the tragic events in 2019,  
 20 but we must not look at what happened in Whitemoor with  
 21 hindsight. At the time was there anything to suggest to  
 22 you that this Learning Together course and continued  
 23 involvement with it could cause any difficulties  
 24 whatsoever?  
 25 A. No.

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1 Q. Does your dissertation on hope in any way impact upon  
 2 the way in which you assess risk? Or in which those  
 3 involved in the assessment of risk in the prison assess  
 4 it?  
 5 A. Yes, I think it does, in so much the research process  
 6 I went through to write that dissertation gave me  
 7 a better understanding of the impact of hope and  
 8 relationships between staff and prisoners and  
 9 relationships between prisoners. So I think it gave me  
 10 a better understanding of institutional risk, which  
 11 I think helps me in understanding order and control  
 12 risks, and some security issues.  
 13 So I think it has had an impact, yes.  
 14 Q. But did it change in any way the way in which the  
 15 security department assessed the risk within the prison?  
 16 A. No.  
 17 Q. And in general, is it right that decisions, as we heard  
 18 from Mr Machin, decisions made within prisons as to what  
 19 prisoners are and are not permitted to do, are made on  
 20 a case-by-case basis?  
 21 A. Yes.  
 22 Q. And as we heard from Mr Machin, not just on  
 23 a case-by-case basis, but on a day-by-day basis?  
 24 A. Yes.  
 25 Q. And so, as we heard, is it right that if a prisoner who

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1 is permitted to undertake a course behaves in a way that  
 2 would suggest he would pose a risk, then his permission  
 3 would be withdrawn?  
 4 A. Immediately.  
 5 Q. And there was nothing to suggest that Mr Khan would pose  
 6 a risk within the prison environment, within the  
 7 classroom environment, to Learning Together staff or  
 8 other prisoners?  
 9 A. No.  
 10 Q. Your concern was risk within the prison?  
 11 A. Absolutely, yes.  
 12 Q. But did you simply ignore risks outside the prison?  
 13 A. Sorry, there were two questions there.  
 14 Q. Yes.  
 15 A. So my focus was, with Learning Together --  
 16 Q. Yes.  
 17 A. -- safety within the prison.  
 18 Q. Yes.  
 19 A. But I don't think it would be correct to say that we  
 20 ignored risks outside of the prison.  
 21 Q. And with regard to management of Mr Khan following his  
 22 release, that was a matter for MAPPA?  
 23 A. Yes.  
 24 Q. With input from the prison as to intelligence and  
 25 evidence of behaviour?

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1 A. Yes.  
 2 Q. They would be managing his licence conditions and they  
 3 would be managing those contacts that Mr Khan had after  
 4 his release?  
 5 A. Yes.  
 6 Q. That wouldn't be a matter for you?  
 7 A. No, absolutely not.  
 8 MS LEEK: Thank you sir, I have no further questions.  
 9 JUDGE LUCRAFT: Thank you.  
 10 Further questions by MR HOUGH QC  
 11 MR HOUGH: Just a couple of points very quickly, Mr Styles.  
 12 You were asked questions by Mr Armstrong about  
 13 hard-headed risk assessment by comparison with various  
 14 things you said in 2019. Just to confirm: you weren't  
 15 responsible for any assessment of risk for Usman Khan in  
 16 2019 after he had been released from prison?  
 17 A. I was not responsible, that's correct.  
 18 Q. And in 2018, indeed, while you had overall strategic  
 19 responsibility for the prison, including risks within  
 20 the prison, is it right that you weren't hands-on  
 21 responsible for assessing the risk of individual  
 22 prisoners, including Usman Khan?  
 23 A. That's right, sir, yes.  
 24 Q. You were asked a question by Ms Leek about consideration  
 25 of excluding individuals from the Learning Together

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1 course on the basis of offence category or type of  
 2 person, and you gave the answer that that wasn't  
 3 appropriate in circumstances where the activity was kept  
 4 very safe within the prison?  
 5 A. Yes.  
 6 Q. Now, you told me very frankly that consideration wasn't  
 7 given to the risks of admitting people to a course which  
 8 had longer term scholastic relationships post-release?  
 9 A. Yes, that's correct.  
 10 Q. If consideration had been given to that, would you agree  
 11 that that would have engaged a wider set of  
 12 considerations about whether people of a particular  
 13 profile could be trusted safely to engage in those  
 14 longer term relationships?  
 15 A. I'm not suggesting it necessarily would have changed  
 16 outcomes prior to November 2019, but yes, it may have  
 17 changed the process, the decision-making process.  
 18 Q. Certainly if you were looking at that question now, with  
 19 what we know, would that kind of decision about those  
 20 being permitted to engage in a course with longer term  
 21 relationships, would that engage such broader  
 22 considerations of whether it's safe to have certain  
 23 types of people engage with those longer term  
 24 relationships with academics?  
 25 A. Yes.

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1 MR HOUGH: Thank you very much. Those are all my questions.  
 2 I think that's all we have for you, Mr Styles.  
 3 JUDGE LUCRAFT: Thank you very much indeed for coming,  
 4 Mr Styles. Thank you.  
 5 A. Thank you, sir.  
 6 MR HOUGH: The next witness is Ms Nix.  
 7 MS JULIA NIX (affirmed)  
 8 JUDGE LUCRAFT: Good afternoon. Please sit or stand,  
 9 whichever you feel most comfortable doing, and you have  
 10 taken off your mask and you are happy to do so, that's  
 11 fine with us, thank you.  
 12 Questions by MR HOUGH QC  
 13 MR HOUGH: Would you please give your full name for the  
 14 court?  
 15 A. Julia Alice Nix.  
 16 Q. Ms Nix, you understand I'm asking questions first on  
 17 behalf of the Coroner, and then you may have some  
 18 questions from others?  
 19 A. Yes.  
 20 Q. Your witness statement was made on 19 December 2019, and  
 21 we may go to that if we need to.  
 22 By background, what was your occupation in the  
 23 latter half of 2019?  
 24 A. So I'm the district manager for the Department of Work  
 25 and Pensions, so I have responsibility for 26 jobcentres

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1 across Norfolk, Suffolk and Cambridgeshire, three  
 2 benefit offices and nine prisons.  
 3 Q. Have you developed a particular interest in the  
 4 rehabilitation and employment of ex-offenders?  
 5 A. I think it would be fair to say I've developed  
 6 an interest in the rehabilitation of anybody wanting to  
 7 reform and go into work, yes.  
 8 Q. In the course of developing and pursuing that interest,  
 9 have you engaged with charitable and other organisations  
 10 who work with ex-offenders?  
 11 A. A whole range. I would put them in the hundreds. Over  
 12 my 38 years' service, I've engaged with public, private  
 13 and voluntary bodies.  
 14 Q. Thank you. I'm going to begin with a Learning Together  
 15 event that took place at HMP Whitemoor on 12 June 2019,  
 16 which was a digital innovation roundtable event. Did  
 17 you attend that event?  
 18 A. Yes, I did.  
 19 Q. Had you had any previous connections or dealings with  
 20 Learning Together?  
 21 A. No.  
 22 Q. What caused you to attend that event?  
 23 A. James Tweed, who was developing the Chromebooks, had  
 24 worked with me a few months previously to explain the  
 25 technology of how we could support individuals who

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1 couldn't have access to the internet, and that was of  
 2 interest to me to see how we could use that and develop  
 3 that for other jobseekers.  
 4 Q. Now, were you aware either before that event or at that  
 5 event how Learning Together worked?  
 6 A. No.  
 7 Q. Did you attend, nevertheless, and see that both serving  
 8 and ex-offenders were attending the event?  
 9 A. I didn't until I was at the event and then realised that  
 10 there was both serving and ex-offender. It's unusual  
 11 that there's an ex-offender attending.  
 12 Q. We know Usman Khan attended the event. Did he speak at  
 13 the event, speak to the entire group who had assembled?  
 14 A. Yes, he did.  
 15 Q. What do you recall of what he said in his presentation  
 16 to everyone?  
 17 A. He said how much he had enjoyed the learning inside the  
 18 prison, how much he had benefited from it, but his  
 19 concern was that it may not be of any help if he  
 20 couldn't get work.  
 21 Q. Did he say anything more about his particular efforts to  
 22 find work and their success or otherwise?  
 23 A. He had mentioned that he had been trying, so he had then  
 24 been out of prison for five or six months and his  
 25 disappointment was that he wasn't getting anywhere.

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1 Q. Did you form any impression of him based on that  
 2 presentation to the group?  
 3 A. Only a frustration that he wanted to turn his life round  
 4 and he wanted to find employment.  
 5 Q. Admittedly it was just a snapshot, but did you get the  
 6 impression that he was entirely sincere in that?  
 7 A. At that time, yes.  
 8 Q. After he had spoken, did you see him during the course  
 9 of the event?  
 10 A. Yes, so once the event had finished, we were at opposite  
 11 ends of the table, it was a very large table, we were at  
 12 opposite ends of the table and I went towards him as he  
 13 went towards the buffet table.  
 14 Q. Did you speak to him?  
 15 A. Yes.  
 16 Q. What was the conversation?  
 17 A. I think this is really relevant, so he was just about to  
 18 speak to the governor that I mention in my statement.  
 19 That governor was not Will Styles. I know Will Styles.  
 20 As Will Styles mentioned, he and I do know each other  
 21 very well. This governor — it is confusion, we call  
 22 everybody governor, as Will Styles mentioned, so anybody  
 23 of any seniority in a prison is called a governor. In  
 24 DWP, in East Anglia, we call them governor number 1.  
 25 Will Styles would have been governor number 1 in my

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1 opinion; this was not Will Styles. So they were having  
 2 a conversation and I approached them and they stopped  
 3 their conversation to speak to me.  
 4 Q. As you approached, did either of them say anything?  
 5 A. Did either of them?  
 6 Q. Did either of them say anything to you as you approached  
 7 to welcome you into the conversation?  
 8 A. They did. So I believe, but it is a little vague, that  
 9 Usman would have introduced me to the governor, who  
 10 I mentioned, but I didn't catch his name and I then  
 11 offered my support and help and that is when the  
 12 conversation went with "Usman is a good man and has  
 13 completely reformed".  
 14 Q. Did he go on to say, as you say in your statement, if  
 15 you could help him get a job, he would be very grateful?  
 16 A. Yes, he did.  
 17 Q. If we could put on screen {DC6695/79} and go to the  
 18 bottom of the page, we see a list of confirmed  
 19 attendees. Are you able, looking at that list, and  
 20 there's just a couple of names on the following page  
 21 which we'll look at in a moment, but are you able,  
 22 looking at that page, to identify who the person you  
 23 identify as a governor might have been?  
 24 A. No, I can't, but I will observe that that does not seem  
 25 to be a full list. There seemed to be far more people

1 round the table than that list. But I'll also mention  
 2 that I don't think this governor sat round the table  
 3 that I'm speaking about, he came into the event  
 4 afterwards.  
 5 Q. If we go over the page, just to complete the list of  
 6 names {DC6695/80}, just so you have seen them all,  
 7 there's just a few on the last page which I don't think  
 8 would have included anybody described as a governor  
 9 anyway.  
 10 A. No.  
 11 Q. So you can't, with the assistance of that list, pick  
 12 somebody out. Is it right that even if we were able to  
 13 give you a longer list with every person who entered  
 14 that room, you still might not be able to identify them?  
 15 A. I wouldn't, no.  
 16 Q. Thank you. We can take that off screen now.  
 17 Did you then say anything about making arrangements  
 18 to help Usman Khan find a job?  
 19 A. Yes, I did. I said to him if he was serious about  
 20 wanting to find a job, I would do everything I could to  
 21 personally help him.  
 22 Q. Were contact details exchanged?  
 23 A. Yes.  
 24 Q. Was anything else said either by him or during the  
 25 course of that meeting that you recall as being notable?

1 A. No.  
 2 Q. After that event, in the days that followed, did you  
 3 have any discussions with Usman Khan over the telephone?  
 4 A. Yes. So quite quickly Usman made contact. I'd given  
 5 him my business card and I sought expert help from  
 6 Mary Scales, one of my ex-prison work coaches. She  
 7 spent 17 years inside Norwich prison, and that's where  
 8 we met Will Styles. But she has a real expertise of  
 9 dealing with ex-offenders and she and I had  
 10 a conversation together with Usman.  
 11 Q. What did you cover in the conversation?  
 12 A. That how was he -- how was his thinking around moving  
 13 forward and finding employment; did he have contact with  
 14 his family; and just sort of general terms about what  
 15 type of work he thought he might be interested in, but  
 16 all around employment.  
 17 Q. Can you recall anything about what he said?  
 18 A. Yes, he said that he was very keen to work. He would do  
 19 absolutely anything, which is always pleasing to me,  
 20 because it's easier to find somebody a job if they're  
 21 willing to do anything, and he would respond to whatever  
 22 requests I have asked of him.  
 23 Q. Was anything said about his offending?  
 24 A. He did mention that he had done something very serious,  
 25 but on a scale of -- I remember very clearly

1 he described -- nobody ever has described this to me  
 2 since, so that's why I remember it, on a scale of A to Z  
 3 he felt that although it was terrorism, it was on the A  
 4 scale because it was purely fundraising.  
 5 Q. Did you have any further discussions later in your  
 6 relationship with him in which you asked about his  
 7 offending?  
 8 A. Yes, I did. So I'd been working with him then again for  
 9 five or six months. I had planned, as I used to  
 10 describe it to Usman, there is a plan A, B, C and D. A  
 11 wasn't working quite as well, so I wanted to move to  
 12 plan B with him, keeping A still going, but at that  
 13 point I had to explain to him that I was then going to  
 14 engage other voluntary and community bodies to help, and  
 15 I would be giving a personal reference, therefore  
 16 I wanted to know whether he was either thinking now or  
 17 likely to think of terrorist thoughts again.  
 18 Q. What did he say?  
 19 A. He was quite articulate in his response in that he had  
 20 moved away from the individuals that he had been working  
 21 with previously in terrorist activity. He had purposely  
 22 put himself in a place that he wouldn't be influenced,  
 23 and he had no dark thoughts, as -- I described them as  
 24 dark -- he promised me that he would -- he hadn't had  
 25 any terrorist thoughts.

1 Q. In your witness statement, and this is towards the top  
 2 of page 2, you add:  
 3 "I also remember in our future conversations [so  
 4 this is after June 2019 or after mid-June 2019] I did  
 5 ask him 'did you make bombs or do anything really  
 6 serious?' and he did say 'no', he didn't elaborate any  
 7 further."  
 8 A. Correct.  
 9 Q. Do you know whether any of these descriptions he gave  
 10 about the seriousness of his offending were true?  
 11 A. No.  
 12 Q. Now, this isn't a criticism but did you make any  
 13 enquiries, any internet searches or other enquiries to  
 14 find out whether there was anything in the public domain  
 15 about his offending and whether, therefore, what he had  
 16 told you was true?  
 17 A. In my profession it's not helpful to look at Google or  
 18 any internet searches. We really do base ourselves on  
 19 evidence and we do work on the knowledge that on  
 20 a need-to-know basis is what we look at. So no,  
 21 I didn't.  
 22 Q. You didn't think that you could, albeit by an internet  
 23 search, find something that was an authoritative record  
 24 of his offences, like a judge's sentencing remarks or  
 25 anything like that?

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1 A. No, I would trust my HMPP colleagues and the Probation  
 2 Service if there was anything that I needed to know that  
 3 they would have told me.  
 4 Q. Did you then contact an organisation called Clean Sheet,  
 5 a charitable body which helps ex-offenders to find work?  
 6 A. Yes, I did.  
 7 Q. Did you, in addition, make contact with a lady called  
 8 Liz Young, who was working as a work coach for  
 9 Usman Khan at the Stafford Jobcentre?  
 10 A. Yes, I did.  
 11 Q. And did you also speak to his probation officer,  
 12 Ken Skelton?  
 13 A. On a regular basis, yes I did.  
 14 Q. And in the course of those conversations generally, what  
 15 did you seek to do for Usman Khan?  
 16 A. I felt my role was to offer perhaps additional expertise  
 17 to both Liz Young as a work coach and Ken of connections  
 18 with my employers that would be, as we call it,  
 19 ex-offender-friendly, so they would be open to  
 20 ex-offenders in their employment.  
 21 Q. In the course of your discussions with Mr Skelton, did  
 22 you speak about the possibility of getting Usman Khan's  
 23 licence restrictions looked at again in order to get  
 24 him, for example, internet access?  
 25 A. As time went on it was becoming clear that one of the

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1 unhelpful things to finding him employment was his lack  
 2 of restrictions on the internet or to be able to receive  
 3 or send his CV via email. So I did have a conversation  
 4 with Ken to say did he think it was a possibility of  
 5 ever getting those lifted.  
 6 Q. What was Mr Skelton's response to that?  
 7 A. That he would need to take that back to MAPPA.  
 8 Q. Did you press your own contacts in order to find work  
 9 for Usman Khan, as you have said you intended to do?  
 10 A. Yes.  
 11 Q. In that regard, did you, for instance, press a contact  
 12 called Paul Burns, who worked on the M6 motorway  
 13 project?  
 14 A. Yes.  
 15 Q. But in the event, was that contact, and that effort, put  
 16 on hold when Mr Burns' father sadly died?  
 17 A. Correct.  
 18 Q. Over the period from June to October 2019, how often did  
 19 you communicate with Usman Khan?  
 20 A. It did vary. It just depended (a) on how much time I'd  
 21 got in my busy working day, and to whether I'd had  
 22 responses from employers or contacts that I'd made. So  
 23 some weeks it may be a couple of times. It may have  
 24 been as long as a fortnight in between those contacts.  
 25 Q. Now, as we've heard, and as we'll hear in more detail as

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1 the days go past, he had a number of set-backs in his  
 2 search for employment over that period. Were you aware  
 3 of that through those discussions?  
 4 A. Yes.  
 5 Q. How was he coping with those set-backs, so far as you  
 6 could tell from those discussions?  
 7 A. That did vary. On occasions he was quite upbeat, that  
 8 that was to be expected; he realised that he had done  
 9 a very bad thing and it would be difficult for  
 10 an employer to overcome that. And then on other  
 11 occasions, his disappointment would be more obvious.  
 12 Q. In particular, did you receive a text message from him  
 13 on 22 October 2019?  
 14 A. Yes.  
 15 Q. What was the content of that text message?  
 16 A. If I remember rightly, it was the text message that said  
 17 he wanted to thank me very much for all my help and  
 18 support but he had to be realistic; that in spite of all  
 19 my efforts that he may never get a job.  
 20 Q. The way you put it in your witness statement is:  
 21 "... 'I've got to be realistic, I'm never going to  
 22 get a job'."  
 23 A. Correct.  
 24 Q. Did you then telephone him in response to that text  
 25 message?

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1 A. Yes, I did. I prefer to speak to him — he used to text  
 2 me because he knew how busy I was, but often or not  
 3 I would always respond with a telephone call, and at  
 4 that particular time I felt like the urgency was quite  
 5 great because I didn't know whether he was thinking of  
 6 any suicidal thoughts.  
 7 Q. How did he respond when you called him with that  
 8 concern?  
 9 A. He was extremely grateful to hear from me because  
 10 I think that was probably the longest that we hadn't  
 11 spoken, and I think he felt that, you know, perhaps  
 12 I had come to the end of my plans and I wouldn't be able  
 13 to find him employment. So he was very relieved to hear  
 14 my voice and I was very happy to re-engage with him and  
 15 to try and motivate him, and I think my words were: you  
 16 need to be able to trust me to move to plan B.  
 17 Q. Moving into November 2019, on 25 November, did you  
 18 attend an annual celebration event of the organisation  
 19 Clean Sheet?  
 20 A. I did.  
 21 Q. Did you do anything on Usman Khan's behalf at that  
 22 event?  
 23 A. It was following that conversation in my mind I'd felt  
 24 that I needed to give some extra effort and hard work  
 25 to, if I was going to find Usman, so I did speak to

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1 Lady Corbett; I just happened to bump into Lady Corbett,  
 2 explained Usman's situation, and she was very pleased to  
 3 try and help me.  
 4 Q. What did she then do to help?  
 5 A. She gave me her network — she runs a networking,  
 6 I suppose you would call it an organisation, but it's  
 7 an organisation of networks that helps and supports  
 8 ex-offenders. So she gave me access to everybody on her  
 9 network.  
 10 Q. Did she do that that afternoon, 25 November?  
 11 A. She did.  
 12 Q. And on the following day, 26 November, did you use that  
 13 contact list to send Usman Khan's CV to them with a view  
 14 to helping him find work?  
 15 A. I did.  
 16 Q. Later that day, 26 November, did you telephone  
 17 Usman Khan in the afternoon?  
 18 A. Yes, I did, to inform him what I'd done.  
 19 Q. I think that was between 3.30 and 4.30 in the afternoon.  
 20 How did that conversation go?  
 21 A. It was when I explained to him that I'd been fortunate  
 22 enough to go to this event and I'd met a huge range of  
 23 contacts, and I felt that if I sent his CV he needed to  
 24 know that so that he may be contacted by a range of  
 25 voluntary and community bodies that would want to help

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1 him.  
 2 Q. How did he respond?  
 3 A. He was absolutely delighted, grateful. He was so  
 4 respectful, every time he spoke to me he was  
 5 exceptionally respectful, and he always attended  
 6 whatever event or telephone call or programme that  
 7 I ever — so he continued to be massively respectful.  
 8 Q. Now, was it in this conversation that you spoke to him  
 9 about black thoughts?  
 10 A. Yes.  
 11 Q. In your statement you say:  
 12 "For the first time since I've been engaging with  
 13 him, I said to him, 'because all these people are now  
 14 helping you, can you now tell me that you are no longer  
 15 having terrorist or black thoughts'..."  
 16 And he confirmed he wasn't?  
 17 A. He did.  
 18 Q. Do you recall that —  
 19 A. I do.  
 20 Q. — as set out in your statement?  
 21 A. Yes.  
 22 Q. And you go on in your statement to say that  
 23 he responded:  
 24 "... 'that's why I have moved away from these  
 25 people, that's why I have chosen to move to Stafford,

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1 I am 100% positive that I do not have any terrorist  
 2 thoughts at all'..."  
 3 A. They were his words, in my recollection.  
 4 Q. I quote those to you from your statement because  
 5 obviously that was three weeks after the discussion  
 6 rather than 18 months.  
 7 On 28 November 2019, so a Thursday, shortly after  
 8 that discussion, did something happen to cause you to  
 9 contact Usman Khan?  
 10 A. I can't remember.  
 11 Q. Let me help you. It's towards the bottom of page 3 of  
 12 your statement. You say that you noticed from your  
 13 emails that an organisation called Prosper 4 Jobs had  
 14 emailed Usman Khan and copied you into the email,  
 15 explaining that they had put his CV onto their jobs  
 16 board?  
 17 A. Yes.  
 18 Q. When you saw that email, what did you immediately think?  
 19 A. I immediately thought that this was an opportunity that  
 20 he wouldn't want to miss, and I was thinking although  
 21 they think he's got access to emails he hasn't, so  
 22 I needed to alert him to it.  
 23 Q. Did you then send him a text message?  
 24 A. I did, because it was so late I didn't think a phone  
 25 call would be appropriate. I felt a text message was

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1 more appropriate.  
 2 Q. In that text did you ask whether he could pick up  
 3 an email, for example at a library?  
 4 A. I did.  
 5 Q. Did he respond that he couldn't?  
 6 A. He did. And I had forgotten, because he had mentioned  
 7 that when he had a mentor he could pick up emails from  
 8 the library, but he no longer had a mentor, and I had  
 9 forgotten that that was the case.  
 10 Q. Did you then respond by trying to take a photograph of  
 11 the Prosper 4 Jobs email and send it through to him by  
 12 text?  
 13 A. I did. He knew then that I wasn't IT literate and  
 14 he knew that would cause me some frustration, so it was  
 15 a little text message that: please bear with me, I'm  
 16 going to do my best to try and get this to you.  
 17 Q. Did you then ask whether you could forward that email to  
 18 Mr Skelton or Ms Young?  
 19 A. Because he had regular contact with them and he would be  
 20 able to collect it from there.  
 21 Q. And you have said that he spoke about the mentor. Did  
 22 you also have a conversation with him about having his  
 23 licence conditions reviewed in order to enable future  
 24 emails to get through to him?  
 25 A. I did. On, again, a professional basis where if we felt

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1 that it was hindering him seriously getting work, that  
 2 I would be asking Ken to consider it with MAPPA to give  
 3 access to things one at a time. I did explain to him  
 4 we were never going to get over — it would need to be  
 5 step-by-step.  
 6 Q. More generally, was there anything about his demeanour  
 7 in this conversation — recognising it was a telephone  
 8 conversation — that struck you as unusual or  
 9 concerning?  
 10 A. No. So this was a text conversation, the last one.  
 11 Q. I see. Sorry.  
 12 A. The previous one was a telephone conversation. So on  
 13 the evening of the Thursday, it was purely text.  
 14 I didn't speak to him.  
 15 Q. I see. So the conversation which we've gone through on  
 16 that evening about the emails and the means of reviewing  
 17 licence conditions, at that stage it was purely a text  
 18 message?  
 19 A. Purely text.  
 20 MR HOUGH: Thank you very much. Those are all my questions.  
 21 JUDGE LUCRAFT: I think, Mr Hough, I saw an email exchange  
 22 where I think Mr Armstrong indicated that if you asked  
 23 the questions which you have asked, he wouldn't have any  
 24 questions at all, and I think he has confirmed that.  
 25 Can I just check if there are any others?

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1 MR ARMSTRONG: (Off microphone — inaudible).  
 2 JUDGE LUCRAFT: Thank you.  
 3 MR HOUGH: It seems there aren't any further questions.  
 4 Thank you very much for your evidence, Ms Nix.  
 5 JUDGE LUCRAFT: Thank you very much for coming. Thank you.  
 6 MR HOUGH: Sir, I will resist the temptation to suggest that  
 7 we read some evidence to the jury for the next  
 8 15 minutes.  
 9 JUDGE LUCRAFT: We've got through quite a lot, and can  
 10 I simply thank those counsel who have — I was sorry to  
 11 interrupt Mr Armstrong, but I think he had got his point  
 12 across that he wanted to make.  
 13 We have, ladies and gentlemen, we're going to finish  
 14 there for the day. Can I just say that in terms of the  
 15 timetable, we started a bit early this morning, but the  
 16 good news is that so far we are on track for where we  
 17 hoped to be. I can't say any more than that because  
 18 I don't have a crystal ball to say what might happen,  
 19 but that's the good news: we are on track.  
 20 When we've parted company at the end of the week,  
 21 I sound like a cracked record, I've mentioned this pause  
 22 button in your minds, but can I just repeat that. We've  
 23 got a long weekend this weekend, it is a bank holiday  
 24 weekend. I know in this country bank holidays mean wet  
 25 weather, the last thing one wants when one wants to get,

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1 perhaps, outside and a breath of fresh air and something  
 2 different. Whatever you have got planned can I do two  
 3 things: please do press that pause button, don't think  
 4 about the issues we've been discussing through the  
 5 evidence this week, we'll all come back to it fresh on  
 6 Tuesday next week at 10 o'clock, and so please do have  
 7 a break, have a rest. Again I compliment you on your  
 8 timekeeping. Where I normally sit at the Old Bailey, if  
 9 I had jurors who turned up on time as you have done in  
 10 this way, believe you me, that court would run rather  
 11 more efficiently than it does sometimes. I appreciate  
 12 transport problems hit all of us, but your timekeeping  
 13 has been superb, particularly this morning where we  
 14 started at 9.30.  
 15 Enjoy the weekend, thank you very much.  
 16 (In the absence of the jury)  
 17 Mr Hough, I chose my words carefully, on track as  
 18 far as we've got, because I'm conscious we've got,  
 19 again, quite a heavy list of witnesses next week.  
 20 MR HOUGH: We'll rely upon the same helpful cooperation  
 21 we've had over the last few days.  
 22 JUDGE LUCRAFT: I'm sure we will. I'm sure we'll get it  
 23 too.  
 24 We'll meet again on Tuesday morning, thank you.  
 25 (1.05 pm)

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1 (The court adjourned until 10.00 am on  
 2 Tuesday, 4 May 2021)  
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