

# OPUS2

Fishmongers' Hall Inquests

Day 15

May 4, 2021

Opus 2 - Official Court Reporters

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Tuesday, 4 May 2021

(10.03 am)

(In the absence of the jury)

JUDGE LUCRAFT: Good morning.

(In the presence of the jury)

Good morning, everyone. Very nice to see you.

I hope you had a restful weekend.

Mr Hough.

MR HOUGH: Sir, the first evidence the jury will hear today is a statement from Michelle Jones, the mother of Saskia Jones. This is not a pen portrait, it is a substantive statement for the jury to consider, as any other piece of evidence. Michelle is, of course, sitting with us, but the statement is being read as a piece of uncontroversial evidence and Mr Moss will read it.

JUDGE LUCRAFT: Thank you.

MR MOSS: Sir, as with other statements, this is evidence which you are admitting under Rule 23 of the Coroners (Inquests) Rules 2013. Mr Hough has given the name of the maker of the statement. All interested persons have had the opportunity to see the statement on the electronic disclosure platform and could have objected to it being read, but have not done so.

Sir, the statement is dated 20 May, 2020, and

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Ms Jones says as follows.

MS MICHELLE JONES (read)

MR MOSS: "This statement is about my daughter, Saskia Jones and her involvement with an organisation called Learning Together, who in conjunction with Cambridge University organised the event at Fishmongers' Hall on November 29, 2019. I have been asked to comment on my understanding of Saskia's involvement with Learning Together. I make this statement based on conversations I had with my daughter between 2017 and 2019.

"I first became aware of Saskia's involvement with Learning Together in 2017, when Saskia was at Cambridge University. During a conversation, Saskia told me that she was going to be involved in visiting inmates at HMP Grendon, and explained the aims of the Learning Together programme. Saskia wanted to become involved with Learning Together because she believed in the principle of reeducating offenders, thus enabling them to rebuild their lives. Saskia's intentions at that stage were to explore the possibility of teaching in prisons, or working in rehabilitation with a linked organisation.

"I remember Saskia attending various Learning Together events during her time at Cambridge University. In December 2018, after Saskia had left

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Cambridge University, she attended a Learning Together event in Oxford. Saskia received an email from Amy Ludlow of Learning Together, dated 17 December 2018, mentioning that it had been good to see Saskia at the event the previous Saturday. Amy Ludlow also suggested in the email that Saskia may like to become more involved in working for Learning Together.

"Saskia supported the aims of Learning Together, and believed in its ethos of providing opportunities for ex-offenders to be given the chance to rebuild their lives. She found the visits with the inmates of HMP Grendon extremely rewarding, but she did not talk about the individual Learning Together staff. However, I do remember her referring to the travelling to and from HMP Grendon as being a little disorganised on occasions, which caused her some frustration.

"I was not aware that Saskia had any close relationships with any of the Learning Together staff. I am aware that she socialised on the odd occasion with Gareth Evans, who was a student at Anglia Ruskin University, and an ex-offender linked to the Learning Together programme. Saskia had little contact with Learning Together, having left Cambridge University. I'm aware of three emails, one from Amy Ludlow, one from Jack Merritt, and one from

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Gareth Evans, all referring to job opportunities within Learning Together and EXceptionals, which Amy and Jack were suggesting Saskia may be interested in. Saskia had also been in contact with Bounce Back in relation to an opportunity at HMP Brixton around August 2018. She did visit the prison to explore the job role, which was aimed at training and support of ex-offenders, and reconnecting them with the community through employment, but she decided not to pursue it.

"An email invitation was also received from Lisa Ghiggini regarding a Learning Together launch in London on 27 June 2019. I first became aware of the event at Fishmongers' Hall on 25 September 2019. Saskia told me that she had received an invitation to the event. I understood that the event was an anniversary event for Learning Together. Saskia was at first unsure if she wanted to go to the event at Fishmongers' Hall, and this uncertainty persisted up until the evening before the event, 28 November. Eventually, she decided that she should go, because it was an anniversary for the organisation.

"Saskia had arranged to be in Cambridge from 29 November until 5 December 2019, principally to attend an alumni event at Anglia Ruskin University on 4 December 2019. Saskia decided she should go to the

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1 event at Fishmongers' Hall, then travel on to Cambridge  
 2 from London after the event on the 29th. Saskia was  
 3 invited to the Learning Together event at  
 4 Fishmongers' Hall by way of email. The email came from  
 5 the admin team at Learning Together. The email arrived  
 6 on 25 September 2019. Because of her uncertainty in  
 7 attending, Saskia did not reply to this email, and  
 8 a reminder was sent on 9 October. Saskia applied for  
 9 a ticket to the event on 10 October. She received  
 10 a ticket by email on 27 November from Eventbrite.  
 11 "Saskia was not aware of who would be attending the  
 12 event. I asked Saskia the evening before, and she still  
 13 did not know, save for a few staff who were detailed on  
 14 the programme of events that Saskia had received.  
 15 Saskia did not, therefore, discuss exactly who would be  
 16 attending the event. Saskia was keen to maintain some  
 17 involvement with Learning Together, or at least to keep  
 18 informed of their activities. She knew she would not  
 19 have an active role in Learning Together if she  
 20 subsequently joined the police, which she applied for at  
 21 the end of October 2019. She wanted to still support  
 22 Learning Together, but her real passion was victim  
 23 support. Saskia wanted to make a real difference, and  
 24 instigate change in areas relating to policing  
 25 [policies] within this field. This passion was based on

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1 her research at Anglia Ruskin University where she  
 2 completed her BSC in criminology.  
 3 "I had several conversations with Saskia about her  
 4 feelings towards the treatment of ex-offenders. She  
 5 believed that there should be a distinction between  
 6 terrorists and other ex-offenders. Saskia thought that  
 7 different mindsets existed between the two categories,  
 8 and that the treatment of both should be approached  
 9 differently. Her view in relation to terrorist  
 10 offenders was that although they should be given  
 11 an opportunity to change, they should be more closely  
 12 monitored, with extreme caution. She was not naïve in  
 13 her approach, despite her desire to see the good in  
 14 people.  
 15 "To the best of my knowledge, Saskia had not been in  
 16 contact with any terrorist offenders through her work  
 17 with Learning Together prior to the event at  
 18 Fishmongers' Hall."  
 19 And, sir, that is the end of the statement.  
 20 JUDGE LUCRAFT: Thank you very much indeed, Mr Moss.  
 21 MR HOUGH: Sir, our next evidence is Mr Philip Bromley, to  
 22 be called.  
 23 JUDGE LUCRAFT: Thank you.  
 24 MR PHILIP BROMLEY (affirmed)  
 25 JUDGE LUCRAFT: Good morning, Mr Bromley. If you wish to

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1 take a seat whilst giving evidence, that's fine, there  
 2 is a seat just to your side. Whether you sit or stand,  
 3 there's a microphone to help amplify your voice. We all  
 4 have a natural tendency to talk more quietly when we're  
 5 sitting down, but if you can make sure you direct your  
 6 voice into the microphone, we will all be able to hear  
 7 what it is you have to say.  
 8 Thank you.  
 9 Questions by MR HOUGH QC  
 10 MR HOUGH: Would you please give your full name for the  
 11 court?  
 12 A. Phil Bromley.  
 13 Q. Mr Bromley, you understand I'm asking you questions  
 14 first on behalf of the Coroner, and then you will be  
 15 asked some questions by other lawyers?  
 16 A. Yes.  
 17 Q. You made a principal witness statement on  
 18 3 February 2021. We may refer to that as we go.  
 19 Beginning, then, with your background, what is your  
 20 occupation?  
 21 A. Senior probation officer now.  
 22 Q. Have you been employed by the Probation Service  
 23 since October 2007, joining initially as a trainee.  
 24 A. Yes.  
 25 Q. Did you become an offender manager, responsible for the

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1 management of individual offenders in October 2009?  
 2 A. Yes, correct.  
 3 Q. From that time, did you manage a caseload of mainly high  
 4 risk offenders?  
 5 A. Yes, correct.  
 6 Q. Have you, through that time, worked in Staffordshire  
 7 probation?  
 8 A. Yes.  
 9 Q. Is it right that you were offender manager for  
 10 Usman Khan from 2012 to May 2017?  
 11 A. Yes.  
 12 Q. Is it right that in May 2017, you were promoted to  
 13 senior probation officer in the same team?  
 14 A. Yes.  
 15 Q. As a result, you ceased to be offender manager for  
 16 Usman Khan; yes?  
 17 A. Yes.  
 18 Q. You handed over to Ken Skelton?  
 19 A. Yes.  
 20 Q. And you became at the same time his line manager?  
 21 A. Yes.  
 22 Q. Within your team, were there team meetings every month?  
 23 A. Yes.  
 24 Q. Were there also supervision meetings between you, as  
 25 senior probation officer, and each offender manager, at

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1 which their cases would be discussed?  
 2 A. Some of their cases, yes.  
 3 Q. Quite apart from those formal meetings, did you also  
 4 have regular discussions with the offender managers in  
 5 your team about the people they were handling and any  
 6 issues they had to raise?  
 7 A. Yes.  
 8 Q. Did you also work closely with a specialist  
 9 counter-terrorist probation team, managed by a lady  
 10 called Lois Gell?  
 11 A. Yes.  
 12 Q. Is it right that Mr Sumeet Johal, from whom the jury  
 13 will be hearing later today, was a member of that team?  
 14 A. Yes.  
 15 Q. And was the counter-terrorist probation officer with  
 16 responsibility for Usman Khan?  
 17 A. Yes.  
 18 Q. In a sentence or two, if you can, what is the function  
 19 of the counter-terrorist probation team?  
 20 A. Their main function an advisory capacity, so they will  
 21 advise and support and provide guidance for  
 22 practitioners who may be working with anyone who was  
 23 convicted of an extremist offence, and they would also  
 24 attend MAPPA.  
 25 Q. Is this right, then: the offender manager for

1 an offender in the community is the person primarily  
 2 responsible for managing that person from a probation  
 3 standpoint?  
 4 A. Yes.  
 5 Q. But that the counter-terrorist probation officer with  
 6 responsibility for that offender will give advice to the  
 7 offender manager?  
 8 A. Yes.  
 9 Q. May we then move to the period when you were offender  
 10 manager for Usman Khan. Did you become his offender  
 11 manager in February 2012 after he had been sentenced?  
 12 A. Yes.  
 13 Q. At that time, were terrorist or TACT offenders  
 14 relatively new to the caseload of Staffordshire  
 15 probation officers?  
 16 A. Yes.  
 17 Q. By that time, so 2012, had the counter-terrorist  
 18 probation team yet been established?  
 19 A. No.  
 20 Q. Can you recall when it was established?  
 21 A. I don't know, in all honesty.  
 22 Q. Now, did you, in managing Usman Khan, a relatively new  
 23 category of offender, use the skills you had built up  
 24 dealing with other high risk offenders?  
 25 A. Yes.

1 Q. Did you also put yourself forward for any training more  
 2 specifically useful for terrorist offenders?  
 3 A. Yes.  
 4 Q. What was that training?  
 5 A. They were known as the HII training, which stands for  
 6 Healthy Identity Intervention, and the ERG training,  
 7 which is Extreme Risk Guidance training.  
 8 Q. Now, the jury have heard about both of those programmes:  
 9 the HII programme being a means of trying to divert  
 10 offenders away from extremism?  
 11 A. Yes.  
 12 Q. And the ERG an assessment tool for assessing risk and  
 13 means of managing terrorist and other extreme offenders?  
 14 A. Yes.  
 15 Q. Early in your period as offender manager for Usman Khan,  
 16 in May 2012, did you prepare an OASys report?  
 17 A. Yes.  
 18 Q. Is this right, as the jury have heard: the OASys system  
 19 is a general system for assessing risk of offenders  
 20 according to a structured method?  
 21 A. Yes.  
 22 Q. If we can put your report on screen, it's {DC5652/1}.  
 23 We can see there the report with your name at the  
 24 bottom, at the bottom of the first page. Then if we go  
 25 to {DC5652/7}, please, do we see that in that report you

1 summarised Usman Khan's offences, which, as the jury  
 2 have heard, involved conspiring to establish a terrorist  
 3 training camp in Pakistan?  
 4 A. Yes.  
 5 Q. May we go to page 8, in the middle of {DC5652/8},  
 6 please. Do we see at section 2.7 you identified that at  
 7 the root of the offence were deeply held ideological and  
 8 religious beliefs which both the accused, Mr Khan, and  
 9 co-accused, were espousing in the public space?  
 10 A. Yes.  
 11 Q. And you identify the risk of Usman Khan having been  
 12 radicalised by propaganda material?  
 13 A. Yes.  
 14 Q. If we go to page 11, please {DC5652/11}, at the bottom  
 15 of the page, do we see here you record some information  
 16 which the jury have already heard about concerning  
 17 Usman Khan's education, information he gave to you about  
 18 having been expelled in his early teens, having no  
 19 further education, and his desire to obtain education in  
 20 the future?  
 21 A. Yes.  
 22 Q. Then {DC5652/13}, please, the middle of the page. Do  
 23 you also record information that you had obtained from  
 24 him about his family history, his number of siblings,  
 25 and the location of his family home?

1 A. Yes.  
 2 Q. This suggests that you had spoken to him in order to  
 3 gain a little bit of information about his background?  
 4 A. Yes.  
 5 Q. And then page 19, please {DC5652/19}. If we go to the  
 6 middle of the page, do we see at section 12.8 you note  
 7 that it was difficult to assess Mr Khan's attitudes  
 8 because he was unwilling to discuss the offence due to  
 9 an appeal he was then pursuing. The jury have heard  
 10 about that appeal.  
 11 A. Yes.  
 12 Q. And then you record again the points you have made in a  
 13 previous section about the ideological roots of the  
 14 offending?  
 15 A. Yes.  
 16 Q. Then {DC5652/31}, please. Did you carry out the risk  
 17 assessment according to the OASys system?  
 18 A. Yes.  
 19 Q. Do we see that for the public, when Usman Khan was  
 20 eventually to be released into the community, you  
 21 assessed his risk as very high, meaning an imminent risk  
 22 of serious harm, the potential harmful event more likely  
 23 than not to happen imminently, and the impact would be  
 24 serious?  
 25 A. Yes.

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1 Q. So no magic to that assessment: your view at the time  
 2 explained by the passages we've looked at was that  
 3 Usman Khan, if released at that moment, would be likely  
 4 to do something seriously harmful to the public?  
 5 A. Yes.  
 6 Q. We can take that off screen now.  
 7 I think also in May 2012 you prepared  
 8 a post-sentence report at the same time, which contained  
 9 much of the same information, I'm not going to go to  
 10 that.  
 11 Did you later in 2012, in August, prepare an initial  
 12 sentence plan?  
 13 A. Yes.  
 14 Q. Can we put that on screen. It's {DC5469/1}, and again,  
 15 did you complete many sections with the same information  
 16 as you had put in your OASys report?  
 17 A. Yes.  
 18 Q. And then at {DC5469/38}, please, if we look at the  
 19 entire page, please, do we see that you set out a number  
 20 of objectives at the end of that plan?  
 21 A. Yes.  
 22 Q. Was one of those to advance Usman Khan's education with  
 23 a view to assisting his employability?  
 24 A. Yes.  
 25 Q. Was a second to complete the ERG assessment process?

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1 A. Yes.  
 2 Q. Then over the page to {DC5469/39}, there's a third one,  
 3 to avoid adjudications while in prison, so effectively  
 4 to keep his nose clean while in prison?  
 5 A. Yes.  
 6 Q. We can take that off screen now.  
 7 While Usman Khan was in prison, which was the period  
 8 while you were his offender manager, how did you receive  
 9 information about both his conduct in prison and about  
 10 intelligence concerning his mindset and behaviour in  
 11 prison?  
 12 A. There would be different methods. It would generally be  
 13 from the offender supervisor in the prison at the time,  
 14 that might be via email, or potentially, if it was  
 15 a telephone call, it might get mentioned to me, but  
 16 I don't recall getting any sort of direct intelligence  
 17 sent to me by the security department, for example, it  
 18 was generally from the offender supervisor.  
 19 Q. The jury have heard that there was a probation system  
 20 calls the Delius system --  
 21 A. Yes.  
 22 Q. -- on which different officers could make notes. Did  
 23 you make notes of significant information you received  
 24 from the offender supervisor at the prison?  
 25 A. Yes, I will have done, yes.

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1 Q. If we can put on screen, please, the Delius notes,  
 2 {DC5632/24}. We'll look at some of the entries you  
 3 made. Now, do we see here an entry you made  
 4 in August 2012, 2 August 2012, where you record an email  
 5 you wrote stating that you understand that Usman Khan  
 6 had obtained a governor's address and was attempting to  
 7 get the governor's telephone number?  
 8 A. Yes.  
 9 Q. Is that information you would have obtained from the  
 10 offender supervisor or some such person at the prison?  
 11 A. Yes.  
 12 Q. Then {DC5633/5}, please. Do we see here an entry you  
 13 made the following year, 27 November 2013, again  
 14 recording an email you wrote saying that Khan had seemed  
 15 to be settling in well, but there had been an incident  
 16 in the wing in which he had become involved in  
 17 an assault, and a chaplain had been caught up in it?  
 18 A. Yes.  
 19 Q. So that came to your attention again from the prison?  
 20 A. Yes.  
 21 Q. Then page 14, please {DC5633/14}. Do we see here  
 22 an entry made on 31 March 2015 by another member of the  
 23 Stoke team, Ian Hodgkinson; who was he?  
 24 A. He was my line manager at the time.  
 25 Q. And do we see that he recorded that Usman Khan was at

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1 Long Lartin. He went through a number of prisons, as we  
 2 know, and quotes:  
 3 "... very much part of the TACT offenders group  
 4 there ie intent on pursuing an agenda as outlined by  
 5 Anwar Al—Awlaki among others."  
 6 A. Yes.  
 7 Q. Anwar Al—Awlaki was an extremist preacher, a hate  
 8 preacher?  
 9 A. Yes.  
 10 Q. Is this an entry which would have come to your attention  
 11 being put on the Delius system?  
 12 A. Yes, and that first line would have probably been put on  
 13 at the start of his sentence by my former line manager,  
 14 and then every so often, a line manager would have to  
 15 review that — it's called a flag — and would add to  
 16 it. So that first line was probably there all along,  
 17 and then the idea would be to add to that.  
 18 Q. Then if we go down the entry, it says that  
 19 in March 2014, Usman Khan had been moved prisons for the  
 20 sixth time because of an incident of fighting?  
 21 A. Yes.  
 22 Q. That he had initially displayed behavioural problems but  
 23 was now beginning to engage with the ERG assessment  
 24 process?  
 25 A. Yes.

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1 Q. And then do we see:  
 2 "Discussed in supervision with Mr Bromley... noted  
 3 the several moves in prison system but positive news  
 4 that he can now undertake [the] HII [process]."  
 5 A. Yes.  
 6 Q. So all that information was in your mind by that stage  
 7 in the process?  
 8 A. Yes.  
 9 Q. If we look at the bottom of the page, we can see another  
 10 entry you made in July 2015. Over the page, please, to  
 11 {DC5633/15}. Do you record information from the prison  
 12 that he was thought to be involved in heading a bullying  
 13 gang on HU4A, which I think is a small specialist unit?  
 14 A. Yes, I will have recorded that.  
 15 Q. So once again, information coming to you that he was  
 16 involved in extremist bullying?  
 17 A. Yes.  
 18 Q. And then page 24, please, we see another entry you make  
 19 on 17 March 2017 {DC5633/24}, and you refer to  
 20 an incident where Usman Khan was involved in blocking  
 21 a doorway during an assault on another inmate?  
 22 A. Yes.  
 23 Q. And that he had been reduced to the basic level of IEP,  
 24 that's the privileges regime?  
 25 A. Yes.

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1 Q. And that he had then jumped onto the spur netting in  
 2 protest?  
 3 A. Yes.  
 4 Q. We can take that off screen now.  
 5 After the initial OASys assessment you performed in  
 6 2012, did you perform further similar assessments and  
 7 produce reports in each following year, 2013, 2014, 2015  
 8 and 2016?  
 9 A. Yes.  
 10 Q. What was the risk level you ascribed to Usman Khan  
 11 regarding the general public in the community in each of  
 12 those assessments?  
 13 A. That was very high.  
 14 Q. You maintained it at very high in each one of those?  
 15 A. Yes.  
 16 Q. May we look at a couple of other entries in those  
 17 documents? First of all, {DC5655/17}, please. So this  
 18 is the report from March 2014, and if we go to the  
 19 bottom of the page, please. Do we see this entry made:  
 20 "Mr Khan stated that he is coping adequately in  
 21 custody and that there are no issues in regard to  
 22 emotional well—being/depression, et cetera. However  
 23 Mr Khan has been moved between several prisons now due  
 24 at least in part to his behaviour which has included  
 25 protests, accusations towards staff of racist behaviour

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1 and an assault although when discussing these issues UK  
 2 minimises or denies this behaviour. Despite some of  
 3 these issues, he does appear to still be coping in  
 4 a general manner with his current situation."  
 5 And then you refer to a care plan in place.  
 6 A. Yes.  
 7 Q. Did you obtain this reflection from Usman Khan directly?  
 8 A. From memory, if it was from the sentence planning  
 9 meeting, it would have been a combination of Mr Khan and  
 10 the offender supervisor as well, I imagine.  
 11 Q. Now, you tell me, because you were at the meeting, but  
 12 this entry suggests that when you confronted Usman Khan  
 13 with instances of his bad behaviour, he either tried to  
 14 play it down or deny it?  
 15 A. Yes.  
 16 Q. Given the various pieces of information you had  
 17 received, did you find those denials plausible?  
 18 A. A difficult question in the sense that it happens quite  
 19 a lot with offenders in custody to demonstrate positive  
 20 behaviour and negative behaviour, especially young men,  
 21 it's not that uncommon, but of course I remained  
 22 sceptical that — his account wasn't always necessarily  
 23 accurate, yes.  
 24 Q. Then may we look at the next OASys report you prepared  
 25 for March 2015. This is {DC5656/9}. If we maximise the

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1 bottom half of the screen, do we see you refer to  
 2 a series of sentence planning board meetings, as you've  
 3 said, dating the form with the most recent ones towards  
 4 the top?  
 5 A. Yes.  
 6 Q. And can we see that under the most recent  
 7 one, March 2015, you note that he has started the HII  
 8 programme, completed seven sessions out of 30, and  
 9 initial feedback was positive?  
 10 A. Yes.  
 11 Q. You note that his behaviour had improved over the last  
 12 12 months, so early 2014 to early 2015?  
 13 A. Yes.  
 14 Q. With no adjudications or negative comments, and  
 15 education being explored.  
 16 A. Yes.  
 17 Q. But then you say this at the very end:  
 18 "He is certainly saying all the right things but of  
 19 course time will tell the validity of this."  
 20 A. Yes.  
 21 Q. Does that reflect the caution or scepticism you were  
 22 just speaking about?  
 23 A. Yes.  
 24 Q. Let's now have a look at some of those sentence planning  
 25 boards, and let's first identify what purpose they

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1 served.  
 2 You were involved over these years in a sentence  
 3 planning board every year?  
 4 A. Yes.  
 5 Q. What was such a board? How did it take place and what  
 6 was its purpose?  
 7 A. So generally sentence planning meetings at that time  
 8 happened once a year, where the outside probation  
 9 officer, so me in this case, would meet with the  
 10 offender supervisor in prison and the offender,  
 11 primarily to discuss what sentence planning objectives  
 12 would be set. So that could be things like education or  
 13 a particular programme. And the idea would be to review  
 14 that objective every 12 months to see what progress had  
 15 been made.  
 16 In Mr Khan's case it was slightly different in that  
 17 it was led by the prison more so than myself, so they  
 18 would organise the sentence planning boards and set the  
 19 time frame. I think that was because it was a maximum  
 20 security prison, it was a little bit more difficult to  
 21 organise, but it was the same principle.  
 22 Q. Now may we look at the notes for the sentence planning  
 23 board of March 2015, the one we were just seeing  
 24 referenced in your OASys report, and the notes are  
 25 {DC5362/1}. Who would prepare these notes?

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1 A. That would be -- again, generally a lot of sentence  
 2 planning meetings wouldn't have those notes. I think in  
 3 Mr Khan's case because of, again, being in maximum  
 4 security and the seriousness of the offending was  
 5 perhaps why they were, and I think it was the offender  
 6 supervisor who produced those notes.  
 7 Q. If we look at page 4, please {DC5362/4}. If we look at  
 8 the second half, we can see that at that point Mr Khan  
 9 was located in a MCBS unit, as the jury have heard,  
 10 a specialist unit for challenging prisoners?  
 11 A. Yes.  
 12 Q. Then {DC5362/6}, focusing on the bottom of page 6 first  
 13 of all. Mr Khan gives his perspective:  
 14 "... stated that he feels he has made good progress.  
 15 He has completed all his targets, ie engaged with  
 16 psychology and is undertaking the... HII and he has  
 17 remained adjudication free. He said that he now  
 18 realises that his thinking at the time of the offence  
 19 was not based on Islam and that the people he was  
 20 hanging around with... were a negative influence."  
 21 {DC5362/7}.  
 22 Then further down the page:  
 23 "Mr Khan said that he has been able to think about  
 24 the perspective of his religion and the wider  
 25 environment. He said that through the authentic studies

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1 he is receiving from the Imam at HMP Woodhill he has  
 2 a greater understanding."  
 3 Then there is reference to his education.  
 4 A. Yes.  
 5 Q. Then if we go to the bottom of that page, please, we  
 6 move on to feedback from wing staff.  
 7 Before we discuss that, is that set of comments what  
 8 you were referring to in the OASys assessment when you  
 9 said that he was saying all the right things?  
 10 A. I don't remember exactly, but I would have assumed so,  
 11 yes.  
 12 Q. Then if we look at the feedback from wing staff, we see  
 13 reference to him having been fully compliant. No issues  
 14 reported from them.  
 15 A. Yes.  
 16 Q. Then at the bottom of page 10, please {DC5362/10}, do we  
 17 see that the meeting recommendations conclude that:  
 18 "Mr Khan has made positive progress ... keen to  
 19 engage and complete his targets. He expressed his  
 20 agreement and willingness to work with staff to achieve  
 21 and complete the objectives..."  
 22 Then over the page {DC5362/11}, no further detail  
 23 from that entry.  
 24 So the reports at that time were positive, and Khan  
 25 was saying very well motivated things about his attitude

24

1 to offending?  
 2 A. Yes.  
 3 Q. Now, as we have seen, and we can take that document off  
 4 screen, as we have seen, just a few months later you  
 5 were making an entry in the Delius notes, which we  
 6 looked at a little while ago, linking Khan to  
 7 an extremist group?  
 8 A. Yes.  
 9 Q. When you made that entry, did you reflect back on what  
 10 Khan had said and did that increase your scepticism?  
 11 A. It may have done. I think I probably had that sense of  
 12 scepticism, probably throughout, because it was mixed  
 13 behaviour, but that wasn't necessarily uncommon for all  
 14 types of offenders to fluctuate in their behaviour  
 15 throughout a sentence.  
 16 Q. Now, at the same time that you received — that you made  
 17 that Delius entry linking Khan to an extremist group, we  
 18 know that there was intelligence suggesting Khan was  
 19 inciting violence against another prisoner who had  
 20 disagreed with a plan to attack staff. Was that a piece  
 21 of information that came to your knowledge?  
 22 A. I don't recall that, no.  
 23 Q. Moving on to March 2016, the sentence planning board for  
 24 2016, may we please have on screen {DC5364/9}. Now,  
 25 these are the notes of the equivalent board

1 in March 2016, and we see that there had been no  
 2 adjudications in the last 12 months and that Mr Khan was  
 3 currently on the enhanced level of IEP, so positive  
 4 signs?  
 5 A. Yes.  
 6 Q. And then "Offenders perspective on progress":  
 7 "Mr Khan said that undertaking the HII has put  
 8 things into perspective ... he has questioned himself  
 9 and has matured. He ... doesn't now see conflict about  
 10 being Muslim and British. He ... 'sees this as my  
 11 country' ... he would not have said this 5/7 years ago.  
 12 He said the biggest benefit is feeling comfortable about  
 13 'who I am and who I identify with'.  
 14 "... he has a better understanding of ... the way he  
 15 comes across ...  
 16 "[And] That he has his own goals to focus on..."  
 17 A. Yes.  
 18 Q. Then {DC5364/10}, please. Again, was it reported that  
 19 Mr Khan had been compliant with wing rules and regime  
 20 and staff were again reporting no difficulties with  
 21 dealing with him?  
 22 A. Yes.  
 23 Q. Then {DC5364/14}, please, the bottom of page 14, did the  
 24 meeting agree that Mr Khan had made positive progress,  
 25 and note that he was keen to move on to a normal

1 location away from a specialist unit?  
 2 A. Yes.  
 3 Q. We can take that off screen. So that's March 2016.  
 4 We know that in December 2016 there was intelligence  
 5 naming Khan as a senior TACT offender grooming others  
 6 for use after release. Did you become aware of that  
 7 intelligence?  
 8 A. Not that I can recall, no.  
 9 Q. We also know that in February 2017, Mr Khan was involved  
 10 in an attack on another inmate followed by the protest  
 11 on the netting, and we saw from your Delius notes that  
 12 you did become aware of that?  
 13 A. Yes.  
 14 Q. When you did become aware of that, so 11 months or so  
 15 after that rather positive report, can you recall what  
 16 your reflection or thought process was?  
 17 A. Not exactly, but it would have caused concern. Again,  
 18 potentially not a huge surprise in terms of, again going  
 19 back to my comments about behaviour sometimes  
 20 fluctuating between positive and negative, but it would  
 21 have raised concerns, but part of our role is to carry  
 22 on working with people who do behave badly in prison as  
 23 well and we have to carry on working with them  
 24 regardless.  
 25 Q. Did it, however, strike you that Usman Khan was giving

1 textbook answers in the sentence planning boards about  
 2 positive identity and motivation for change?  
 3 A. Potentially, but in terms of how I remember it, although  
 4 I did remain sceptical, I didn't necessarily  
 5 automatically think sort of 100% he was being  
 6 superficial. It did seem to a degree to be genuine, but  
 7 again, there was a sense of scepticism as well.  
 8 Q. Did anything in your mind indicate the risk that this  
 9 might be somebody who was consistently manipulative and  
 10 deceitful?  
 11 A. I don't — I don't think I would have necessarily  
 12 thought of it in those terms. Again, you always do  
 13 maintain that sense that all this might not be as it  
 14 seems but, again, sometimes it's quite easy to spot if  
 15 someone's being manipulative or lying. Sometimes it's  
 16 a lot more difficult, and everywhere in between as well,  
 17 I guess.  
 18 But I think for me, because of the nature of the  
 19 index offences originally, and that it was new to me and  
 20 Staffordshire probation, we were always going to treat  
 21 him very seriously regardless, right from the index  
 22 offences.  
 23 So I think if Mr Khan's behaviour had been  
 24 impeccable throughout, for example, he would have still  
 25 had the most serious restrictions and licence conditions

1 anyway.

2 Q. You explained in the OASys report that at the root of

3 his offending was a deeply held extremist ideology.

4 Taking account of all those planning board meetings, by

5 early 2017, when you were about to hand over to

6 Mr Skelton, did you think Usman Khan retained that

7 extremist ideology?

8 A. I didn't think he was a reformed character, so I would

9 have -- I would have thought that there was still some

10 potential -- some thinking along those lines that might

11 still be present, yes.

12 Q. So far as you can recall, when Mr Skelton took over from

13 you, did you have discussions about Usman Khan, the

14 person he was taking on, what sort of person he was,

15 what sort of risks he presented?

16 A. Yes.

17 Q. Can you recall in general terms what you said to

18 Mr Skelton about Usman Khan on those occasions?

19 A. Again, in general terms I would have highlighted the

20 good progress, because we did see it as progress,

21 although clearly it was mixed. We would have spoken

22 about the behaviour and the fluctuations in positive and

23 negative behaviour. The positive fact that he had

24 engaged with HII and eventually with ERG, so there was

25 some what seemed to be positive engagement with staff in

1 particular, but of course we would have remained

2 cautious.

3 Q. Did you specifically warn him that there was a chance

4 that this was a deceitful person?

5 A. Again, I don't think I would have specifically used

6 those terms, because I think by that stage I wasn't

7 sure, in all honesty, whether he was completely engaging

8 and it was all positive, or he was completely

9 duplicitous. I wasn't sure at that time.

10 Q. Did you ever say to Mr Skelton anything along the

11 lines: he's saying all the right things time after time,

12 but there is a chance that he could be entirely

13 superficial?

14 A. Again, obviously I don't know any exact words, but

15 I think that would have formed some of our

16 conversations, generally speaking.

17 Q. From May 2017, when you handed over to Mr Skelton, was

18 he primarily responsible for dealing with Khan directly?

19 A. Yes.

20 Q. As you've told us, you would have, as line manager,

21 spoken to him regularly about Usman Khan like all his

22 other cases?

23 A. Yes.

24 Q. Did you also attend MAPPAs meetings, or some of them?

25 A. Some of the MAPPAs meetings, yes.

1 Q. We'll come to those in a moment.

2 We know that six months or so after you handed over

3 to Mr Skelton, Usman Khan became involved with

4 Learning Together, the Cambridge University programme,

5 first engaging in one course with that programme, and

6 then more. Did you become aware of that?

7 A. At some point I became aware of it, yes.

8 Q. What did you gather, from Mr Skelton or otherwise, about

9 Usman Khan's connection with Learning Together and its

10 effects on him?

11 A. From recollection it all seemed very positive. They

12 were working closely with him in relation to education,

13 which of course was one of the sentence plan objectives,

14 so it seemed to fit in well with that, and I think they

15 were involved with the -- working closely with the

16 prison and other offenders, and I know that he had

17 an interest in creative writing and had done English and

18 things like that, so it seemed like a natural

19 progression for him to work with them.

20 Q. In July 2018, so a little over a year after you had

21 handed over to Mr Skelton, did he prepare the OASys

22 assessment for that year?

23 A. Yes.

24 Q. If we can put that on screen, {DC5659/1}. We can see

25 Mr Skelton's name at the bottom of the page, as the name

1 of the assessor?

2 A. Yes.

3 Q. And then over the page to {DC5659/2}, we can see that

4 it's counter-signed by you?

5 A. Yes.

6 Q. Now, was that in fact a first draft of that assessment?

7 A. Yes.

8 Q. After it had been prepared, did you speak to Mr Skelton

9 about it?

10 A. Yes.

11 Q. In brief, what did you say to him?

12 A. I mean, I don't recall the detail, but we have a system

13 where if an OASys assessment is sent to me, I sometimes

14 roll it back for some amendments. That was generally

15 about quality, or potentially some information wasn't

16 quite in the wrong -- wasn't in the right box, sorry.

17 So it wasn't to do with content or risk analysis as

18 such, so I would have rolled that back in terms of the

19 IT to Mr Skelton, and then had a conversation with him

20 about maybe tweaking it a little bit.

21 Q. If we could put on screen {DC5660/1}, is this the

22 revised version Mr Skelton produced after the tweaking

23 you've described?

24 A. Yes.

25 Q. Then {DC5660/2}, we can see it's got a different

1 counter—signer?  
 2 A. Yes.  
 3 Q. What's the explanation for that?  
 4 A. So John Mason is a senior manager within the office, so  
 5 any very high risk of harm assessments should be  
 6 counter—signed by a senior manager, whereas I was  
 7 I suppose what would be classed as a middle manager.  
 8 I signed the first one because it was kind of —  
 9 I was on autopilot, if you like, I knew the case  
 10 relatively well and signed a lot of OASys. Because I'd  
 11 asked Mr Skelton to make amendments, I could do that and  
 12 then knowing that it would go to the correct person next  
 13 time.  
 14 Q. And if we go to {DC5660/46}, please. Now, I'm going to  
 15 ask Mr Skelton about the detail of this assessment  
 16 because he was the one who prepared it, but can we see  
 17 that the risk rating for the general public once  
 18 Usman Khan was in the community remained very high?  
 19 A. Yes.  
 20 Q. Did you discuss that risk rating with Mr Skelton at the  
 21 time?  
 22 A. Not in any detail I recall.  
 23 Q. However, you knew that Usman Khan retained this very  
 24 high risk rating?  
 25 A. Yes.

1 Q. Did you also know that he was due to be released into  
 2 the community about five months later?  
 3 A. Yes.  
 4 Q. We can take that off screen now.  
 5 You've confirmed that you attended some MAPPA  
 6 meetings relating to Khan, not all of them?  
 7 A. Yes.  
 8 Q. Now, you're one of the first witnesses we will be  
 9 hearing about MAPPA meetings in detail with. Is a MAPPA  
 10 meeting a meeting including police, probation and other  
 11 relevant stakeholder organisations for the purpose of  
 12 managing a high risk offender in a joined up way?  
 13 A. Yes, exactly. Yes.  
 14 Q. In terms of format, will the MAPPA panel meet and  
 15 discuss a series of cases, a series of offenders,  
 16 producing minutes for each one?  
 17 A. Yes.  
 18 Q. Is it right that minutes of MAPPA meetings are produced  
 19 on a specified form after the meetings?  
 20 A. Yes.  
 21 Q. If we could put on screen, please, {DC6511/83}. Now,  
 22 this is a section from the formal MAPPA guidance of  
 23 2012. We see that at 13b.1, the guidance refers to the  
 24 importance of accurate minutes being kept, and the use  
 25 of the MAPPA B form for that purpose?

1 A. Yes.  
 2 Q. And do we also see that the guidance says that MAPPA  
 3 minutes must be written in a way to allow those not  
 4 present at a meeting to understand the nature of the  
 5 discussion and the issues?  
 6 A. Yes.  
 7 Q. And that the records must also demonstrate defensible  
 8 decision—making?  
 9 A. Yes.  
 10 Q. Was that your understanding of the purpose of MAPPA  
 11 minutes?  
 12 A. Yes.  
 13 Q. Then do we see that there are requirements for MAPPA  
 14 meetings to be distributed to attendees within a set  
 15 period of time after the meeting?  
 16 A. Yes.  
 17 Q. That the chair should confirm that the minutes are  
 18 correct at the next meeting?  
 19 A. Yes.  
 20 Q. And it makes provision for amendments and corrections to  
 21 be made?  
 22 A. Yes.  
 23 Q. And then at 13b.3, does it describe the process by which  
 24 minutes are sent, including by secure email and the  
 25 like?

1 A. Yes.  
 2 Q. Again, did that reflect your understanding of how MAPPA  
 3 minutes would be circulated and the facility to approve  
 4 or disagree with them?  
 5 A. Yes.  
 6 Q. We can take that off screen now. Did you attend a MAPPA  
 7 meeting concerning Usman Khan in December 2018, the  
 8 month of his release?  
 9 A. Yes.  
 10 Q. We can put on screen the minutes, {DC6409/1}. Now, this  
 11 is the MAPPA B form to which the guidance referred?  
 12 A. Yes.  
 13 Q. We can see that the date of the meeting is  
 14 5 December 2018, and these minutes relate to Usman Khan.  
 15 If we go to {DC6409/3}, if we blow up the bottom of the  
 16 page, we can see the various attendees, people from the  
 17 Probation Service, from West Midlands Counter—Terrorist  
 18 Unit, from Staffordshire Police, and Ms Boulton joining  
 19 by teleconference.  
 20 A. Yes.  
 21 Q. And you're identified as one of the attendees?  
 22 A. Yes.  
 23 Q. Then if we go, please, to {DC6409/6}, and if we could  
 24 maximise the middle of the page from about one third of  
 25 the way down.

1 Now, in this meeting the minutes record discussions  
 2 of intelligence suggesting that Khan was trying to  
 3 radicalise other Muslim prisoners, and that he had said  
 4 he would return to his old ways, believed to be related  
 5 to terrorism when he was released next year. Do you  
 6 remember that intelligence being discussed at that  
 7 meeting, appreciating it was a long time ago?  
 8 A. No, I don't recall it in any detail, no.  
 9 Q. Were you aware in more general terms that there was  
 10 concern about intelligence about Khan's motivations  
 11 after leaving prison?  
 12 A. From memory, I think it was difficult in the sense that  
 13 we were aware of some of this information coming  
 14 through, but didn't always necessarily have a bit more  
 15 context and detail for us to do anything with, as such.  
 16 Q. Did you ask for more context and detail?  
 17 A. I don't think -- I personally didn't, but from memory,  
 18 I think around the table at the MAPPA panel, that will  
 19 have been asked for on occasion, yes.  
 20 Q. Was it asked for on this occasion in relation to  
 21 intelligence about Khan's intentions after release?  
 22 A. I don't recall.  
 23 Q. We can take that off screen now.  
 24 Now we know that in December 2018, on Christmas Eve,  
 25 Usman Khan was released on licence and placed initially

1 in an approved premises in Stafford, Staithford House.  
 2 Were you aware of his release and accommodation at the  
 3 time?  
 4 A. Yes.  
 5 Q. Is it right that Mr Skelton was dealing with the details  
 6 of his release, seeing him on the day, handling the  
 7 logistics?  
 8 A. Yes.  
 9 Q. Shortly after he was released, we have heard that  
 10 Usman Khan was invited to a Learning Together event in  
 11 Cambridge due to take place in March 2019. Was that  
 12 an issue you became aware of?  
 13 A. Yes.  
 14 Q. How did you become aware of it, so far as you can recall  
 15 now?  
 16 A. As I recall, it would have been a discussion with  
 17 Mr Skelton.  
 18 Q. What did Mr Skelton say?  
 19 A. Again, I'm going from memory so I don't know the exact  
 20 details, but it would have been a discussion, perhaps in  
 21 supervision, about a potential event that Mr Khan could  
 22 attend run by Learning Together, and we would have been  
 23 discussing whether we thought he should go or not.  
 24 Q. What was your view?  
 25 A. Again, from memory we thought it was a little bit too

1 early, and also, if I remember rightly, it might have  
 2 involved an overnight stay, so he would have been away  
 3 for, I think, two days, which seemed like perhaps too  
 4 long.  
 5 And also when someone's in an approved premises,  
 6 generally we would only give permission for an overnight  
 7 stay if it was to a resettlement or accommodation, so in  
 8 other words, the address he would eventually be moving  
 9 onto after the approved premises, we would allow  
 10 an overnight stay. This particular event wouldn't have  
 11 fit that criteria.  
 12 Q. If we put on screen {DC6062/20}. Now, do we see in the  
 13 middle of the page an entry by Mr Skelton in the Delius  
 14 notes, 6 February 2019, Mr Skelton sending  
 15 a communication to Lois Gell, I think that is?  
 16 A. Yes.  
 17 Q. She was from the counter-terrorist probation team?  
 18 A. Yes.  
 19 Q. "Lois apart from this, I have had a conversation with  
 20 Phil and following much deliberation we have decided to  
 21 refuse permission for Usman to go to Cambridge  
 22 University at this time. It is with reluctance but feel  
 23 it is the better decision. However if anything comes up  
 24 in the future and he is maintaining his positive  
 25 behaviour and attitude we will seriously look at giving

1 permission."  
 2 Does that fairly reflect the conclusion you and he  
 3 reached in that discussion?  
 4 A. Yes.  
 5 Q. Now, in your witness statement -- and it's your  
 6 paragraph 24 -- you refer to two aspects of the  
 7 rationale. First of all, you say that more time was  
 8 needed to assess his progress over a longer period  
 9 before a visit to Cambridge could be permitted?  
 10 A. Yes.  
 11 Q. But you also say that you had his prison conduct, his  
 12 negative prison conduct, in the back of your minds; is  
 13 that also right?  
 14 A. Yes.  
 15 Q. And putting it bluntly, the reason that would be  
 16 significant is that you might be sending a potentially  
 17 dangerous person into a new environment with less  
 18 control over him?  
 19 A. Yes, I think we just felt he needed to be tested  
 20 a little bit longer in the community before giving that  
 21 chance.  
 22 Q. In the months that followed, did you continue to have  
 23 your occasional discussions with Mr Skelton?  
 24 A. Yes.  
 25 Q. As far as you can recall, what was his view about

1 Usman Khan's progress?  
 2 A. Generally speaking that he was making good progress. He  
 3 was abiding by his licence conditions, which were  
 4 numerous. He was engaging with staff quite well. There  
 5 was quite a lot of people involved with him, and he  
 6 seemed to be engaging with all of them quite well.  
 7 There was the odd little hiccup in terms of practical  
 8 arrangements and frustration potentially about what  
 9 accommodation might look like and things of that nature,  
 10 but that was quite typical for offenders coming out of  
 11 prison into an approved premises.  
 12 So the overall impression was that he was doing  
 13 well.  
 14 Q. Did you attend a MAPPA meeting concerning Usman Khan on  
 15 17 April 2019?  
 16 A. Yes.  
 17 Q. If we put on screen part of the minutes for that  
 18 meeting, {DC6412/5}, and if we could maximise the middle  
 19 of the page. Now, Usman Khan had mentors allocated to  
 20 him under the government's desistance and disengagement  
 21 programme?  
 22 A. Yes.  
 23 Q. And they saw him very regularly, a couple of times  
 24 a week, I think?  
 25 A. Yes.

1 Q. And do we see in the middle of the page this comment  
 2 noted:  
 3 "[Usman Khan] has now had a change of mentor, there  
 4 were some concerns noted about possible aggressive  
 5 behaviour towards the new mentor but no other agency has  
 6 reported any similar behaviour. Checks have taken place  
 7 and it was understood that [Usman Khan] was unhappy  
 8 about the mentor accompanying him to the gym. It is  
 9 understood that [Usman Khan] has become frustrated about  
 10 the mentor's lack timekeeping..."  
 11 Et cetera.  
 12 So was that an example of the flashes of frustration  
 13 which you were detecting and being told about?  
 14 A. I don't recall specifically being told about that event,  
 15 but yes, I suppose it was a sort of mild frustration  
 16 with things, yes.  
 17 Q. We can take that off screen now.  
 18 In May 2019, did you take a view about Usman Khan's  
 19 risk level according to that OASys categorisation of  
 20 risk?  
 21 A. Yes.  
 22 Q. What was your decision?  
 23 A. So in discussion with Mr Skelton, we reduced him from  
 24 very high risk to high risk.  
 25 Q. If we put on screen, please, {DC6063/9}, if we look at

1 the middle of the page. Do we see a reference to  
 2 a supervision discussion between you and Mr Skelton?  
 3 A. Yes.  
 4 Q. On 15 May 2019, you record that:  
 5 "[Usman Khan] continues to make good progress,  
 6 working with a practical mentor twice a week although  
 7 this may reduce to once a week. Also engages with  
 8 a religious mentor once a month. Keen to find  
 9 employment and continues to apply, but so far has been  
 10 unsuccessful. Disclosure of offences is proving a  
 11 barrier ..."  
 12 And you refer also to a planned move out of approved  
 13 premises?  
 14 A. Yes.  
 15 Q. So that's the supervision. Then if we go back to  
 16 {DC6063/7}, please, the middle of page 7, and the entry  
 17 in the middle of the page, can we see that you recorded  
 18 that Usman Khan was to be reduced in assessment to high  
 19 risk rather than very high risk?  
 20 A. Yes.  
 21 Q. That to be reviewed by Mr Skelton on an ongoing basis?  
 22 A. Yes.  
 23 Q. So the report which you gave for 15 May informed your  
 24 thinking behind this decision?  
 25 A. Yes.

1 Q. Was there any discussion about that change of risk  
 2 rating with any other agency so far as you can recall?  
 3 A. Not as far as I can recall, but I do know that  
 4 Mr Skelton worked very closely with the police and the  
 5 probation officers and the Counter-Terrorism Unit on  
 6 a weekly basis and had an awareness that the feedback  
 7 from everyone was that he seemed to be making good  
 8 progress. So that did feed into our discussion.  
 9 Q. Now, your colleague, Mr Johal, mentions in his witness  
 10 statement -- and we'll ask him about this -- that there  
 11 was some resistance to the change of risk rating from  
 12 West Midlands Police Counter-Terrorism Unit; do you  
 13 recall any such resistance?  
 14 A. No.  
 15 Q. In the entry we just looked at on 15 May 2019, I think  
 16 you refer to a planned event at Whitemoor Prison which  
 17 Usman Khan was attending, and a police escort?  
 18 A. Yes.  
 19 Q. I will now ask you about that, and we can take the  
 20 present document off screen. We know that that was  
 21 a digital innovation event at the prison, which  
 22 Usman Khan was invited to by Learning Together, and  
 23 which he attended with a police escort. Were you made  
 24 aware of that when it was being planned?  
 25 A. Yes.

1 Q. Do you recall discussions about whether he should be  
 2 permitted to attend that meeting?  
 3 A. Yes, I have a recollection of the discussion, yes.  
 4 Q. Who did you have that discussion with?  
 5 A. I would have spoken to Mr Skelton about it, I believe.  
 6 Q. And what was the view you took about whether he should  
 7 attend and any measures for his attendance?  
 8 A. Again, it's — I think it seemed like a good opportunity  
 9 of testing, I suppose, in terms of working with  
 10 Learning Together, it was in a relatively secure  
 11 environment, in the prison. I think in terms of the  
 12 police, it was more the police would accompany him  
 13 rather than escort him, in so much he wasn't be escorted  
 14 because we thought he would be a problem or dangerous in  
 15 some way. It was more because it was such a long  
 16 journey and the police were willing to support him more  
 17 than escort him, if that makes sense.  
 18 Q. In making a decision of this kind, were you balancing  
 19 the risks and benefits?  
 20 A. Yes.  
 21 Q. In July 2019, do you recall that there was further  
 22 discussion about an employment opportunity for  
 23 Usman Khan?  
 24 A. I don't recollect, but if you remind me, I may do.  
 25 Q. Let me show you an entry you made on the Delius system

1 which may jog your memory {DC6063/19}. If we look at  
 2 the entry in the middle for 5 July 2019, we see you made  
 3 an entry in which you discussed Usman Khan's employment,  
 4 and you suggested that he may have obtained employment  
 5 in a construction job. Did you later discover that he  
 6 hadn't obtained any long-term employment but he may have  
 7 been initially accepted?  
 8 A. Yes.  
 9 Q. You then refer to the fact that he had applied to do  
 10 a dumper truck training course, but that you had some  
 11 concern about that course?  
 12 A. Yes.  
 13 Q. What was the nature of your concern?  
 14 A. Again, my recollection I think — I think there had been  
 15 some things in the media around that time to do with  
 16 vehicles being used in possible attacks and I wasn't  
 17 quite sure what a dumper truck was, frankly, in terms of  
 18 the size of it, so it just seemed an idea to suspend it  
 19 until we perhaps knew a bit more.  
 20 Q. And you decided according to this entry to suspend the  
 21 course until Mr Skelton had undertaken an ERG  
 22 assessment?  
 23 A. Yes.  
 24 Q. That was, I think, planned for later that year?  
 25 A. Yes.

1 Q. Then if we move onto the MAPPA meeting that followed on  
 2 11 July, {DC6414/6}, please. This was, I think, another  
 3 MAPPA meeting that you attended in mid-July?  
 4 A. Yes.  
 5 Q. And if you look at the lower part of the page under  
 6 "Panel Discussion", do we see that the MAPPA panel  
 7 discussed the potential dumper truck course?  
 8 A. Yes.  
 9 Q. Do you see under "Panel discussion"? And do we see then  
 10 at the bottom of the page there also being some  
 11 discussion about whether Usman Khan should remain  
 12 restricted from entering train stations.  
 13 A. Yes.  
 14 Q. I think that was in the context of him needing to use  
 15 the train to get to work if he got a job?  
 16 A. Yes.  
 17 Q. And then over the page, please {DC6414/7}. That's the  
 18 end of that discussion. So is this right: at that  
 19 stage, careful consideration was being given to each of  
 20 these potential activities and any relaxations or  
 21 permissions in relation to his licence conditions?  
 22 A. Yes.  
 23 Q. We can take that off screen now. Is it right that  
 24 in August 2019 you had to go back onto the Delius system  
 25 and re-categorise Usman Khan from very high risk to high

1 risk?  
 2 A. Yes.  
 3 Q. You had done that previously, as we saw, in May 2019.  
 4 Why did you have to do it again in August?  
 5 A. It was actually — it was an IT sort of administrative  
 6 issue. So after the discussion with Mr Skelton, our  
 7 view was that he was high risk, so Mr Skelton would  
 8 actually complete an OASys assessment to reflect that.  
 9 We made the decision just to wait until Mr Skelton had  
 10 completed the ERG, which was quite a long process,  
 11 especially since it was the first one that he was done,  
 12 that we would wait until that was done to better inform  
 13 the OASys.  
 14 What happens from an IT point of view, if an OASys  
 15 document is left open, the IT system will lock it  
 16 automatically, and then that links in with our other  
 17 system, which is called Delius, where we register people  
 18 as very high risk or high risk, and because it  
 19 automatically locks, he was still down very high in that  
 20 assessment because we essentially hadn't done it, so it  
 21 reverted automatically back to very high risk, so I put  
 22 another entry on because for someone looking at it might  
 23 have thought he'd gone from very high risk to high risk  
 24 back to very high risk and then to high risk again. So  
 25 it looked a little clumsy, so I was just trying to

1 explain that.  
 2 Q. But from your view, in practical terms, his correct  
 3 assessment from May onwards was high risk rather than  
 4 very high?  
 5 A. Yes.  
 6 Q. If we put on screen {DC6063/25}, we can see entries you  
 7 made at the start of August recording that, and  
 8 explaining that Usman Khan had made good progress, no  
 9 issues around his attitudes and behaviour, engaging well  
 10 with Mr Skelton?  
 11 A. Yes.  
 12 Q. So that's early August 2019.  
 13 Then {DC6063/28}, please, the top of the page, do we  
 14 see two weeks later you make an entry saying that after  
 15 discussion with Mr Skelton, you note that Mr Khan was  
 16 continuing to comply and engage relatively well, he was  
 17 on the cusp of moving out of the approved premises into  
 18 his own flat?  
 19 A. Yes.  
 20 Q. And then you refer to his choice of accommodation?  
 21 A. Yes.  
 22 Q. We can take that off screen now.  
 23 We know that in August 2019, Usman Khan was invited  
 24 by Learning Together to an alumni event in London  
 25 in November 2019. Did you become aware of that at the

1 time?  
 2 A. No.  
 3 Q. Did you become aware of that a little later on?  
 4 A. No.  
 5 Q. When did you become aware of that?  
 6 A. In terms of the actual specific event, was on the day,  
 7 the event took place and the incident happened.  
 8 Q. Did you become aware in advance that Usman Khan had been  
 9 invited to an event in London?  
 10 A. I had had discussions with Mr Skelton previously and  
 11 I knew that there was a plan for Mr Khan to attend  
 12 a Learning Together event in the future and that it  
 13 would likely be in London, so I was broadly aware of  
 14 that. I didn't know the specific details.  
 15 Q. Did you have any discussion with Mr Skelton about  
 16 whether Usman Khan should attend this event?  
 17 A. Yes, I was broadly in support that -- I was in support  
 18 of that.  
 19 Q. When you expressed that support, what did you know of  
 20 the arrangements for the event, where it would be, what  
 21 people would be attending, that sort of thing?  
 22 A. Well, again, I wasn't aware of any -- that specific  
 23 event, so I didn't know anything about that.  
 24 Q. How could you express a positive opinion about him  
 25 attending if you didn't know where it was taking place

1 or who would be attending?  
 2 A. I think it was the principle of attending an event with  
 3 Learning Together rather than the sort of location.  
 4 Q. Why did you think it was a good idea for him to attend a  
 5 Learning Together event?  
 6 A. The feedback and information that I was getting, that he  
 7 seemed to be getting a lot out of the work with them and  
 8 enjoying it, and it was helping with his education, and  
 9 it seemed to me to be making good, sort of constructive  
 10 use of his time, which is not always easy to do with  
 11 high risk offenders when they've come out of prison, so  
 12 the feedback I was getting that this was a positive  
 13 protective factor.  
 14 Q. In August 2019 there was a MAPPA meeting concerning  
 15 Usman Khan which did mention, according to the minutes,  
 16 the proposed trip to London. Were you told anything  
 17 about the discussion that had happened at that MAPPA  
 18 meeting?  
 19 A. Not that I recall, no.  
 20 Q. In August 2019, Usman Khan's mentoring arrangement  
 21 ceased. So he had had these mentors coming to see him  
 22 once or twice a week --  
 23 A. Yes.  
 24 Q. -- and then it stopped, I think because of a contract  
 25 issue between the company that provided the mentors and

1 the Home Office; is that right?  
 2 A. Yes, I wasn't aware of the detail because I didn't deal  
 3 with them, but I was aware that the mentoring was  
 4 potentially going to stop.  
 5 Q. Now, one of the effects of that was that Usman Khan  
 6 could no longer go to the library for supervised use of  
 7 the internet. He couldn't use the internet, for  
 8 example, in job search. Was that something you became  
 9 aware of?  
 10 A. Yes.  
 11 Q. Was there any concern about that: that his means of  
 12 searching for work was now being impeded?  
 13 A. Yes.  
 14 Q. What was done about that, if anything?  
 15 A. From memory we were looking at a solution because, you  
 16 know, using the internet is -- it's a part of everyday  
 17 life now, so stopping someone from using it can be  
 18 problematic for lots of reasons, but of course he needed  
 19 to be supervised. I don't think we came up with  
 20 a solution, again because of the time and what happened,  
 21 so that action never concluded, but from memory we were  
 22 looking at potentially either Mr Skelton or potentially,  
 23 I think it was Ixion, who are an agency that were  
 24 working with Mr Khan to do with his education, could  
 25 have potentially supervised him whilst looking at the

1 internet , but we never got there, from memory.  
 2 Q. In the entries we looked at a few moments ago, in the  
 3 Delius notes, it is evident that you were aware that  
 4 Mr Khan was looking for accommodation outside the  
 5 approved premises?  
 6 A. Yes.  
 7 Q. We know that he moved into a private let flat on  
 8 24 September 2019; did you become aware of that at the  
 9 time?  
 10 A. Yes.  
 11 Q. What was your view of that development, him being  
 12 permitted to move out and moving out into a private  
 13 flat?  
 14 A. Yes, I was supportive of that. It seemed — again, from  
 15 memory, it seemed like the natural time for him to  
 16 progress to accommodation from the approved premises.  
 17 Q. Did you consider that there were any additional risks as  
 18 a result of him not having that on-hand supervision that  
 19 one gets in an approved premises?  
 20 A. We do consider things like that but I think he had been  
 21 there around nine months which, you know, potentially  
 22 longer than that can become counterproductive in terms  
 23 of that reliance on staff, and from what I remember,  
 24 although it was very useful having that staff support  
 25 there for Mr Khan, I'm not sure how much he utilised it,

1 and the good thing about approved premises and the fact  
 2 that Mr Khan moved to the Stafford area, was that he  
 3 could go back there any time. You know, it's — I think  
 4 most residents who leave, especially if they remain in  
 5 the local area, there is an invitation for him to go  
 6 back if he wanted to. He wasn't required to. And there  
 7 were still other professionals and people involved  
 8 working with Mr Khan outside of the approved premises.  
 9 Q. There was a MAPPa meeting, is this right, on  
 10 3 October 2019, which you did attend?  
 11 A. Yes.  
 12 Q. We can put on screen the minutes of that, {DC6416/4}.  
 13 If we look at the bottom half of the page, I'm not going  
 14 to go through every detail of Mr Skelton's presentation,  
 15 because we're hearing from him tomorrow, but we can see  
 16 that he referred in his presentation to the meeting to  
 17 Usman Khan's involvement with various people who were  
 18 seeking to help find him work?  
 19 A. Yes.  
 20 Q. There's discussion of how Usman Khan was using his time,  
 21 and over the page, please {DC6416/5}. So discussion of  
 22 how he is using his time in the paragraph that begins:  
 23 "Calum would like to see [Usman Khan's] day being  
 24 more proactively occupied."  
 25 A. Yes.

1 Q. And then a contribution from Lois Gell, that Usman Khan  
 2 was on the list to get a new mentor but he might not be  
 3 a priority .  
 4 A. Yes.  
 5 Q. And so a reasonably wide—ranging discussion. There is  
 6 no reference in those minutes to a discussion of the  
 7 visit to London in the following month, November 2019.  
 8 So far as you can recall, was there any discussion in  
 9 this meeting of a potential visit by Usman Khan to this  
 10 Learning Together event?  
 11 A. Not that I recall .  
 12 Q. If there had been a discussion of a visit to London and  
 13 the arrangements for such a visit, would you have  
 14 expected it to be in the minutes, given what we saw in  
 15 the MAPPa guidance?  
 16 A. Yes.  
 17 Q. Now, there was a further — we can take that off screen  
 18 now — there was a further MAPPa meeting  
 19 in November 2019. Is it right that you yourself did not  
 20 attend that meeting?  
 21 A. Correct, yes.  
 22 Q. Following that meeting, did you have any discussions  
 23 with any of those who did attend it?  
 24 A. Not that I recall .  
 25 Q. Did you discover by any means whether there had been any

1 discussion of the London visit at that meeting?  
 2 A. No, because I wasn't aware of the event.  
 3 Q. So before the day of the event itself, what did you  
 4 understand about the planned Learning Together event,  
 5 first of all, when it would be taking place?  
 6 A. As I say, I wasn't aware of the event altogether, so  
 7 I didn't know anything about it.  
 8 Q. All you knew was that there was some vague plan for  
 9 Usman Khan to attend a Learning Together event at some  
 10 point in the future?  
 11 A. Yes.  
 12 Q. Are you able to say whether there was any discussion  
 13 between anyone about the risks of such an event?  
 14 A. I — I'm not in a position to say that, no.  
 15 Q. You see, what you say in your witness statement is this:  
 16 "I didn't attend the MAPPa meetings on 22 August or  
 17 14 November. I don't believe that I knew the date and  
 18 precise location of the event in advance, although  
 19 I knew it was in London. I can only speak for the MAPPa  
 20 meetings I attended, but based on those, there would  
 21 have been healthy discussion of the event at the MAPPa  
 22 meeting."  
 23 A. Yes.  
 24 Q. Now, is it fair to say that that is speculating based on  
 25 what you think should happen or ought to happen at

1 a MAPPA meeting?  
 2 A. Yes.  
 3 Q. Over this final couple of months' period, did you have  
 4 any further discussions with Mr Skelton about  
 5 Usman Khan's progress and behaviour?  
 6 A. Yes, I will have done, yes.  
 7 Q. Do you remember anything about what was said in those  
 8 discussions?  
 9 A. I don't remember the detail. They all were of a similar  
 10 vein in so much he continued to make good progress, he  
 11 wasn't breaching any of the licence conditions. There  
 12 was nothing coming to me that kind of caused any  
 13 concern.  
 14 Q. Now, we shall hear from others, we're likely to hear  
 15 from others, that some of those involved in monitoring  
 16 Usman Khan, in particular DS Stephenson of Staffordshire  
 17 Special Branch, had concerns about him being socially  
 18 isolated, and that was raised both in the MAPPA meeting  
 19 of November 2019 and in some email communications. Did  
 20 you become aware of those concerns?  
 21 A. It's always a difficult problem with -- not always, but  
 22 a lot of the time when high risk offenders come out of  
 23 custody and then leave approved premises, they can be  
 24 socially isolated, and it's difficult, frankly, to put  
 25 something in place, but in terms of Mr Khan, I was aware

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1 that he had a lot of contact with Mr Skelton, with the  
 2 police, the mentor, I think, was still in place at that  
 3 point and, again, I suppose Learning Together and  
 4 Cambridge University would form a part of that plan, and  
 5 then working with employment agencies. So there were  
 6 still quite a lot of people involved with Mr Khan but,  
 7 yes, it is a problem sometimes, isolation.  
 8 Q. Well, let me correct one thing: the mentoring  
 9 arrangements ceased in August.  
 10 A. Oh, sorry, okay.  
 11 Q. And the move out of approved premises was  
 12 on 24 September.  
 13 A. Okay.  
 14 Q. But setting that to one side, we are likely to hear that  
 15 seasoned professionals in this field had concerns and  
 16 expressed concerns about Mr Khan being socially  
 17 isolated. So not simply a business as usual matter, but  
 18 specific concerns.  
 19 Did those specific concerns come through to you?  
 20 A. Not that I recall, it was as you said, pardon the  
 21 expression, but the norm where someone does become  
 22 a little bit isolated, because we were aware that  
 23 Mr Khan's family were in Stoke-on-Trent, which wasn't  
 24 too far away as well, so I don't recall being  
 25 specifically concerned, more than the ordinary, if that

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1 makes sense.  
 2 Q. Finally this: we have heard and we will hear a little  
 3 more that there was a police visit to Usman Khan on  
 4 14 November, at which the officers photographed his  
 5 substantial collection of Xbox games and DVDs and he  
 6 became a bit upset about this. Was that something you  
 7 became aware of?  
 8 A. Yes.  
 9 Q. Again, how did you become aware of that?  
 10 A. It was a discussion with Mr Skelton.  
 11 Q. Did you have any particular concern about that  
 12 information coming through?  
 13 A. No, from what I recall, Mr Khan was a little irritated  
 14 by it, but it didn't seem anything disproportionate,  
 15 a sort of disproportionate reaction to that.  
 16 Q. Very finally this: you told us that you became aware on,  
 17 I think, the day of the attack that Usman Khan's  
 18 attendance was at an event in London, at  
 19 Fishmongers' Hall. When and how did you become aware of  
 20 that?  
 21 A. On the day itself.  
 22 Q. How?  
 23 A. Mr Skelton came into my office -- it was late on  
 24 a Friday, about 4 o'clock -- and informed me about it.  
 25 Q. And told you what had happened about the attack?

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1 A. Yes, I think someone had contacted him from  
 2 Fishmongers' Hall.  
 3 Q. What did he say? What was his immediate reflection?  
 4 A. I honestly don't remember, it seems like a blank now,  
 5 but he was extremely shocked and surprised. From  
 6 memory, and Mr Skelton will be able to tell you himself,  
 7 I think he was initially concerned about sort of -- he  
 8 knew there had been an incident in London but he didn't  
 9 necessarily know that Mr Khan was involved so he was  
 10 concerned about how Mr Khan might get back, such was the  
 11 surprise, I suppose, that he felt, and the shock.  
 12 Q. Did you share that surprise and shock?  
 13 A. Yes.  
 14 MR HOUGH: Thank you very much, sir. Those are all my  
 15 questions, and that may be a convenient time for  
 16 our break.  
 17 JUDGE LUCRAFT: It's probably a very good time for our  
 18 mid-morning break.  
 19 We are going to take a break, Mr Bromley, for about  
 20 15 minutes, just so we can all have a comfort break, all  
 21 right? Thank you.  
 22 (In the absence of the jury)  
 23 I'll rise.  
 24 (11.32 am)  
 25 (A short break)

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1 (11.50 am)  
 2 (In the presence of the jury)  
 3 JUDGE LUCRAFT: Yes, Mr Pitchers.  
 4 Questions by MR PITCHERS QC  
 5 MR PITCHERS: Mr Bromley, I'm Henry Pitchers, I ask  
 6 questions on behalf of the family of Saskia Jones.  
 7 Can I just start by asking about your own direct  
 8 professional dealings with Usman Khan. As we've heard,  
 9 you were the offender manager between 2012 and 2017?  
 10 A. Yes.  
 11 Q. As I understand it from reading your written evidence,  
 12 you had about six discussions with Khan in that period?  
 13 A. I think it was about that, yes.  
 14 Q. But these, I don't believe, were face-to-face  
 15 discussions in person?  
 16 A. Some were.  
 17 Q. Some were, were they?  
 18 A. Some were, yes.  
 19 Q. But were some by video link and some by phone?  
 20 A. I think there was maybe one or two by phone, but there  
 21 were some in person.  
 22 Q. This is not a criticism, but that's obviously quite  
 23 a limited face-to-face involvement with him over the  
 24 course of five years?  
 25 A. Yes. Yes.

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1 Q. And am I right that you never met him subsequently?  
 2 A. That's correct. I didn't meet him subsequently, yes.  
 3 Q. So in the period after you handed over to Mr Skelton,  
 4 you never met him?  
 5 A. No.  
 6 Q. You never met him after he had been released from  
 7 prison?  
 8 A. No.  
 9 Q. And, again, inevitably, therefore, you must have been  
 10 heavily reliant upon the information that others  
 11 provided to you --  
 12 A. Yes.  
 13 Q. -- to gain your insights and understandings as to how he  
 14 was getting on?  
 15 A. Yes.  
 16 Q. And in terms of the nature of your supervision of  
 17 Mr Skelton, we will be hearing from him, but my  
 18 impression is that he is an experienced probation  
 19 officer?  
 20 A. Yes.  
 21 Q. Can you give us a sense as to how long, to your  
 22 knowledge, he has been a probation officer?  
 23 A. I don't know exactly, but it's certainly well over  
 24 20 years, and I've known Mr Skelton, working in the same  
 25 office as him for a number of years as well, so very

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1 experienced.  
 2 Q. Approximately how many years do you think you spent  
 3 working alongside each other?  
 4 A. About five, six years, maybe.  
 5 Q. And I don't think you had any concerns about his  
 6 competence or his experience?  
 7 A. No.  
 8 Q. And you obviously had other probation officers, offender  
 9 managers to supervise. Am I right that there's about  
 10 nine or ten in total --  
 11 A. Yes.  
 12 Q. -- in 2019?  
 13 A. Yes.  
 14 Q. So he would be one of nine or ten?  
 15 A. Yes.  
 16 Q. And each of those would have about 30 cases, is that  
 17 right?  
 18 A. Yes.  
 19 Q. So if you like, under your supervision there were about  
 20 300 cases?  
 21 A. Yes.  
 22 Q. In 2019 specifically?  
 23 A. Give or take, yes.  
 24 Q. And by cases, we mean individual offenders?  
 25 A. Yes.

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1 Q. Some of whom will be in custody, some of whom will be in  
 2 the community?  
 3 A. Yes.  
 4 Q. Can you help us with this: in 2019, how many TACT  
 5 terrorist offenders were there amongst that cohort of  
 6 about 300?  
 7 A. Three.  
 8 Q. Three, and that included Usman Khan?  
 9 A. Yes.  
 10 Q. Were any others in the community in 2019?  
 11 A. Not in 2019, no. I'm just trying to make sure  
 12 I remember rightly. I think -- because they were the  
 13 co-accused.  
 14 Q. Right.  
 15 A. They were the co-accused in Mr Khan's case, they were  
 16 released later.  
 17 Q. Were they released before the attack?  
 18 A. I'm struggling to remember. I don't think so, no.  
 19 Sorry, yes, they were, sorry, yes.  
 20 Q. They were?  
 21 A. Yes. One of them was, sorry.  
 22 Q. One of them was, right. Don't worry, it's difficult.  
 23 A. Yes.  
 24 Q. One of them was released; was he released within months  
 25 of Usman Khan being released?

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1 A. Yes.  
 2 Q. Can you help us with when? We may need to get this from  
 3 other witnesses?  
 4 A. Again, I'm struggling to remember the date, but I think  
 5 he was released maybe six months after Mr Khan?  
 6 Q. Right.  
 7 A. Again, give or take.  
 8 Q. But there's no evidence, is there, that they had any  
 9 contact with each other?  
 10 A. No.  
 11 Q. Would you be able to say you're confident they didn't  
 12 have any contact with each other?  
 13 A. To the best of my knowledge, yes, they didn't have any  
 14 contact.  
 15 Q. So given the scale of the numbers you're supervising,  
 16 your confidence in Mr Skelton, would it be fair to say  
 17 that you largely left Mr Skelton to get on with his job  
 18 unless either he sought your input or it was one of  
 19 those periodical supervision sessions?  
 20 A. Yes.  
 21 Q. You had the confidence in him to do that?  
 22 A. Yes.  
 23 Q. And in relation to the Delius system, again, as  
 24 I understand it from reading your evidence, you would  
 25 aim to record if you discussed a case with an offender

1 manager?  
 2 A. Sometimes, yes.  
 3 Q. And you say, and I think fairly, that not every brief  
 4 conversation would be recorded on Delius, but presumably  
 5 conversations of any significance should be recorded on  
 6 Delius?  
 7 A. Yes. Yes.  
 8 Q. So conversations that would be relevant to risk  
 9 management should be recorded on Delius?  
 10 A. Generally, yes.  
 11 Q. And conversations, exchanges in relation to any  
 12 significant decision-making again should be recorded  
 13 on --  
 14 A. Yes.  
 15 Q. -- Delius.  
 16 Would it be reasonable to conclude in 2019 that any  
 17 supervision session -- that's the periodical discussion  
 18 you would have with offender managers -- would be and  
 19 should be recorded on Delius?  
 20 A. Yes. Or, sorry, just to correct, it would depend on  
 21 which cases were discussed. So not every case would be  
 22 discussed within that supervision session. So  
 23 depending, it may be three or four might have been  
 24 discussed, and then I would potentially, or Mr Skelton,  
 25 put a record on Delius to reflect that. So not every

1 case would be discussed each time.  
 2 Q. So just to be clear, this is perhaps stating the  
 3 obvious, you would be having supervision sessions with  
 4 offender managers but you wouldn't discuss each of their  
 5 cases?  
 6 A. That's correct, no, I wouldn't.  
 7 Q. But those you did discuss with them, that should be  
 8 recorded on Delius under that particular case?  
 9 A. Yes, again, depending on the nature of the discussion,  
 10 but yes.  
 11 Q. But if it was a supervision session where you discussed  
 12 a specific offender?  
 13 A. Yes.  
 14 Q. That certainly should be recorded on Delius?  
 15 A. Yes.  
 16 Q. And could we have up, please, {DC6063/28}. I think we  
 17 see here 16 August, you might have to go up one page,  
 18 actually, just to catch the date {DC6063/27}, so we see  
 19 the date right at the bottom there, 16 August 2019, and  
 20 this is -- can we just go, please, to the top of  
 21 {DC6063/28}, and this is an entry that you made, isn't  
 22 it?  
 23 A. Yes.  
 24 Q. And the contact type is described as "oversight"?  
 25 A. Yes.

1 Q. Would I be right to conclude that this was a supervision  
 2 session?  
 3 A. It could well have been, yes. It does look like that,  
 4 yes.  
 5 Q. It certainly looked like that when I read it, and you're  
 6 familiar with the entry, aren't you?  
 7 A. Yes.  
 8 Q. And would you agree that this was a supervision  
 9 session --  
 10 A. Yes.  
 11 Q. -- with Mr Skelton, at which Usman Khan was discussed?  
 12 A. Yes.  
 13 Q. And have you had the opportunity to look through the  
 14 Delius records, certainly for 2019, in preparation for  
 15 giving evidence at this Inquest?  
 16 A. I've been able to look at some of them, yes.  
 17 Q. And am I right that this is the last entry that you made  
 18 on the Delius records for Usman Khan?  
 19 A. I think it could have been, yes.  
 20 Q. You certainly have no recollection of there being  
 21 subsequent entries made by you prior to the attack?  
 22 A. No, but I -- I might be misremembering, but not to my  
 23 knowledge, no.  
 24 Q. So that would suggest, wouldn't it, that there were no  
 25 subsequent supervision sessions after 16 August at which

1 you discussed Usman Khan?  
 2 A. It would suggest that, yes.  
 3 Q. Yes. Just so we put this in context, so this is  
 4 obviously -- it is about three months before the attack,  
 5 and it's about a month or so before he moved into his  
 6 own premises; yes?  
 7 A. Yes.  
 8 Q. Does it surprise you, on reflection, that you didn't  
 9 discuss Khan in that supervisory way --  
 10 A. Yes, I mean --  
 11 Q. -- in that period?  
 12 A. -- to a degree, I mean, I would have thought that we may  
 13 well have discussed him since then, whether it was more  
 14 -- because as I say, sometimes we would discuss him but  
 15 it wouldn't be in the formal setting, necessarily, of  
 16 supervision, or perhaps we may have had supervision and  
 17 either potentially not mentioned Mr Khan or may have  
 18 mentioned him, but I -- potentially there was nothing of  
 19 note to record. So I suppose what I'm trying to say is  
 20 there could have been another supervision session, we  
 21 could have discussed Mr Khan, but it might have been  
 22 a relatively short conversation so I wouldn't have  
 23 necessarily recorded it.  
 24 Q. But we can safely conclude that there were no  
 25 significant discussions between you and Mr Skelton after

1 this about Usman Khan?  
 2 A. Yes.  
 3 Q. Could we just, please, move on to MAPPA, and we're all  
 4 trying to understand the role of MAPPA. Could you just  
 5 do your best to explain in layman's terms what the role  
 6 of MAPPA is in the management of a TACT offender who has  
 7 been released from prison?  
 8 A. So the general idea is that MAPPA is a forum where it  
 9 brings together different agencies, so probation,  
 10 police, maybe social services and mental health  
 11 services, it brings them together round the table at  
 12 regular meetings to discuss high or very high risk of  
 13 harm offenders that -- not every high risk offender, but  
 14 those that need a multi-agency approach, so that  
 15 information can be shared and there's a sort of  
 16 coordinated action plan for that offender.  
 17 Q. If is obviously, as you have described, not simply a  
 18 forum where probation provide reports; there is input  
 19 from the other agencies?  
 20 A. Yes.  
 21 Q. And presumably it's an opportunity for probation to  
 22 receive information?  
 23 A. Yes.  
 24 Q. And also to receive expert guidance and input as to --  
 25 A. Yes.

1 Q. -- the best way to manage the particular offender?  
 2 A. Yes.  
 3 Q. And in relation to any significant decisions of offender  
 4 management, did MAPPA have a veto over decisions made at  
 5 probation?  
 6 A. It's a difficult question to answer in the sense that  
 7 I don't recall ever it coming to that point, so  
 8 generally decisions would be made, people would share  
 9 their opinions and views around the table. Generally  
 10 speaking people would be on the same page and  
 11 a consensus decision would be reached, of course not  
 12 everyone agreed all the time, but in terms of -- I don't  
 13 recall there ever being a veto as such, but I think that  
 14 that could potentially happen.  
 15 Q. Yes. And it would certainly be fair to say, wouldn't  
 16 it, that the input from the MAPPA panel outside of  
 17 probation certainly should be very influential --  
 18 A. Yes, absolutely, yes.  
 19 Q. -- on offender management. Their views wouldn't be  
 20 dismissed lightly, would they?  
 21 A. Not at all, no.  
 22 Q. And you've already been taken to some of the minutes of  
 23 MAPPA meetings; I'm just interested now in the ones that  
 24 took place after Usman Khan had been released from  
 25 prison, so these were all in 2019. Am I right that --

1 were you invited to all of them?  
 2 A. Generally speaking, at a MAPPA level 3, representatives  
 3 from probation are at senior management level whereas  
 4 I'm, again, sort of middle manager level, so I wasn't  
 5 necessarily obliged to be at any of them, but because  
 6 I knew a little bit about the case and because we wanted  
 7 to show support to Mr Skelton and to show a sort of real  
 8 willingness to actually work together to supervise this  
 9 person, I wanted to go, or my line manager asked me to  
 10 go in that capacity, so that's why I went to some but  
 11 not necessarily all of them.  
 12 Q. Right. But were you aware when each one was taking  
 13 place?  
 14 A. Yes.  
 15 Q. And if we see in the minutes that your apologies were  
 16 given to the meeting, would that suggest that it was  
 17 a meeting to which you had been invited?  
 18 A. Yes.  
 19 Q. But for whatever reason had been unable to attend?  
 20 A. Yes.  
 21 Q. And just to run through, so we have a broader view of  
 22 this, the first meeting was in January 2019 and you  
 23 didn't attend that and you gave your apologies; does  
 24 that fit with your recollection?  
 25 A. Yes.

1 Q. The second was in March of 2019, and again, you didn't  
 2 attend that meeting ---  
 3 A. Yes.  
 4 Q. --- you gave your apologies. As we've heard, you did  
 5 attend in April 2019, in person, and in May, at the end  
 6 of May 2019 you attended by phone?  
 7 A. Yes.  
 8 Q. July 2019 you were present; yes?  
 9 A. Yes.  
 10 Q. August 2019, you didn't attend but you gave your  
 11 apologies.  
 12 A. Yes.  
 13 Q. We know that you attended on October 2019, but that was  
 14 by telephone?  
 15 A. Yes.  
 16 Q. November 2019, you didn't attend, and no apologies were  
 17 recorded but I don't know if there's any significance in  
 18 that?  
 19 A. I don't know, to be honest.  
 20 Q. So there were eight MAPPAs meetings in 2019, and you  
 21 attended half of them?  
 22 A. Yes.  
 23 Q. Two of those by phone, two in person; yes?  
 24 A. Yes.  
 25 Q. And, as we've heard, at none of the ones you attended

1 was there any discussion about the Fishmongers' Hall  
 2 event?  
 3 A. No.  
 4 Q. Does the fact you only attended half of those  
 5 meetings --- and I'm not meaning this necessarily as  
 6 a criticism --- reflect really a light-touch supervision  
 7 that you were providing to Mr Skelton in 2019?  
 8 A. No. It's --- as I say, it's potentially the opposite in  
 9 so much as I wasn't obliged to go to any of those MAPPAs  
 10 meetings, I wouldn't have had to go because there was  
 11 a lot of probation representatives already at that  
 12 meeting, but I wanted to go because I was obviously  
 13 interested and also to support Mr Skelton, but it wasn't  
 14 just about supporting Mr Skelton, it was about us,  
 15 again, having quite a robust approach to MAPPAs and being  
 16 present and being interested in coordinating the case.  
 17 Q. Was it not an impediment to effective supervision to  
 18 miss half the meetings?  
 19 A. No, I don't think so, because I would have regular  
 20 supervision with Mr Skelton and, as we've discussed,  
 21 some more informal discussions, so I would be kept up to  
 22 date potentially from that.  
 23 Q. Let's move on, please, to the question of risk  
 24 assessment, and you've been taken to a number of the  
 25 OASys risk assessments, and this is, as far as I can

1 tell, a pretty long, complicated form?  
 2 A. Yes.  
 3 Q. It's a rigorous approach, isn't it, to the assessment of  
 4 risk?  
 5 A. Yes.  
 6 Q. I think it runs to about almost 60 pages; doesn't it?  
 7 A. Yes.  
 8 Q. Am I right that the process of completing an OASys risk  
 9 assessment is not just a form-filling exercise?  
 10 A. Yes.  
 11 Q. So, if you like, it's by going through that process that  
 12 you should end up with the best possible, the most  
 13 accurate assessment at the end.  
 14 A. Yes.  
 15 Q. It's by going through the process that you get the right  
 16 conclusions?  
 17 A. Yes.  
 18 Q. So you shouldn't start with a conclusion and then start  
 19 the assessment?  
 20 A. Generally, yes, although you would have an idea of what  
 21 it was going to be when you started the OASys  
 22 assessment. Not always; potentially.  
 23 Q. Let's look at that. So yes, you might have a sense, if  
 24 you've done them before, as to where it will end up, but  
 25 that will be based upon impressions, wouldn't it?

1 A. Yes.  
 2 Q. And in a sense, the reason for doing the rigorous  
 3 assessment is to ensure that the conclusion of that  
 4 assessment isn't impressionistic?  
 5 A. Yes, and I suppose it depends on the reason you're  
 6 completing the OASys as well. For example, if you were  
 7 reducing someone's risk level, then you would have  
 8 effectively made that decision before you do the OASys.  
 9 Q. I just want to ask you a little bit about that. Isn't  
 10 there a danger in reducing the conclusion as to the  
 11 level of risk without having gone through the process?  
 12 A. Well, no, because I suppose in theory as a probation  
 13 officer completing the OASys you would have that  
 14 knowledge already, and the OASys would be reflecting  
 15 your thinking.  
 16 Q. Well, that seems --- that doesn't fit with what I was  
 17 suggesting to you earlier about the importance of going  
 18 through the process to get the answer rather than  
 19 starting with the answer before you go through the  
 20 process.  
 21 A. Yes, sorry, I think the OASys is more, I guess,  
 22 a reflection, then, if you've had those thoughts and  
 23 you're thinking about the assessment, then the OASys  
 24 would, I suppose, guide that, rather than it  
 25 automatically coming up with the conclusion.

1 Q. Now, am I correct that, if you like, the last OASys,  
 2 completed OASys assessment was the one that was done  
 3 in December 2018?  
 4 A. Yes.  
 5 Q. So that was never redone, was it?  
 6 A. No.  
 7 Q. And as we've seen, that assessment concluded that  
 8 Usman Khan remained at a very high risk of harm to the  
 9 general public?  
 10 A. Yes.  
 11 Q. Just before we come on to look at what happened in May  
 12 of 2019, could we just pause to look at the definitions  
 13 of risk, and could I have, please, {DC5663/47}, and it's  
 14 the bottom half. So we've heard quite a lot about very  
 15 high risk of serious harm, it's:  
 16 "... an imminent risk of serious harm. The  
 17 potential event is more likely than not to happen  
 18 imminently and the impact would be serious."  
 19 A. Yes.  
 20 Q. That's actually the OASys definition that remained in  
 21 place throughout Usman Khan's time after release from  
 22 custody, until the attack?  
 23 A. Yes.  
 24 Q. So there's actually a probability of serious harm?  
 25 A. Yes.

1 Q. And you've given some evidence about reduction to high  
 2 risk of harm, and we see it defined here, don't we:  
 3 "There are identifiable indicators of risk of  
 4 serious harm. The potential event could happen at any  
 5 time and the impact would be serious."  
 6 A. Yes.  
 7 Q. So, in a sense, we can agree or disagree about whether  
 8 there should have been a reduction to high risk, but  
 9 a high risk of harm, that's still a very alarming  
 10 definition, isn't it?  
 11 A. Yes, it's still very serious, yes.  
 12 Q. It's a definition that would mandate very cautious  
 13 offender management?  
 14 A. Yes.  
 15 Q. It certainly should do, shouldn't it?  
 16 A. Yes.  
 17 Q. So, as we've heard, May 2019, there was a decision that  
 18 was made between you and Mr Skelton to reduce the  
 19 categorisation of harm from very high risk to high risk?  
 20 A. Yes.  
 21 Q. Can you just explain what was the process for that? Was  
 22 that Mr Skelton's idea that you approved? Was it your  
 23 suggestion? Was it done in collaboration? How did it  
 24 come about?  
 25 A. It would have been more in collaboration, it would have

1 been a discussion that maybe Mr Skelton came to me  
 2 about, or whilst we were discussing the progress of  
 3 Mr Khan. The assessment of risk is obviously ongoing,  
 4 it's very fluid, so we wouldn't necessarily expect  
 5 someone to stay very high risk for a long period of time  
 6 or even high risk, the idea that it could fluctuate, so  
 7 it is an ongoing assessment.  
 8 Q. So you wouldn't necessarily expect people to remain  
 9 a very high risk, but they will sometimes?  
 10 A. Potentially, yes.  
 11 Q. Yes.  
 12 A. Yes.  
 13 Q. And therefore you need rigour and evidence, don't you,  
 14 before you --  
 15 A. Yes.  
 16 Q. -- change a risk assessment.  
 17 This might be unfair, but from the way you describe  
 18 it, it doesn't sound like you have a clear recollection  
 19 of the discussions between you and Mr Skelton that led  
 20 to this downgrading of risk; is that a fair comment?  
 21 A. I don't remember the detail, but I do remember having  
 22 the discussion with Mr Skelton because, again, it was  
 23 about reflecting Mr Khan's progress, he seemed to be  
 24 doing very well and he was complying with the licence  
 25 conditions and with staff, and again, we were looking at

1 the definitions. It can be a little bit tricky in so  
 2 much if you're talking about imminence, you know, if  
 3 someone is released from prison who is very high risk,  
 4 imminent, does that mean within weeks or days of it  
 5 happening, so as time progresses it becomes a bit more  
 6 difficult to justify, in my opinion, that very high risk  
 7 assessment.  
 8 Q. But at that time and at the time when you amended the  
 9 system in August 2019, he was still in the approved  
 10 premises?  
 11 A. Yes.  
 12 Q. So he is, if you like, still under a fair amount of  
 13 agency observation and control, just by virtue of the  
 14 fact he is living in approved premises?  
 15 A. Yes. Yes.  
 16 Q. So, as we've heard, this change in the categorisation of  
 17 risk didn't flow from an updated OASys risk assessment?  
 18 A. No, again, it would have started with that discussion  
 19 between myself and Mr Skelton.  
 20 Q. Now, I can't see that it was ever reported into MAPPA.  
 21 To your knowledge, was it ever reported into MAPPA for  
 22 their objection or approval or consideration?  
 23 A. No, I think generally it would have been discussed  
 24 potentially at the next MAPPA, or at the end of each  
 25 MAPPA they normally ask what the OASys assessment is,

1 and then we would have -- or whoever was there or  
 2 Mr Skelton would have said high and that could have  
 3 potentially ...  
 4 Q. Do you remember any discussions at MAPPA meetings --  
 5 A. No.  
 6 Q. -- about this change?  
 7 A. No.  
 8 Q. Do you think you would remember if there had been that  
 9 sort of discussion at a meeting that you attended?  
 10 A. Yes, I would have remembered.  
 11 Q. You would have remembered it?  
 12 A. Yes, because I would have assumed they would have been  
 13 asking, potentially asking me about it.  
 14 Q. They might have asked for justifications?  
 15 A. Potentially, yes.  
 16 Q. And I was a little unsure about your evidence about  
 17 whether this change was discussed with any police  
 18 officers, and let's just pause there. There was  
 19 an involvement by Staffordshire Prevent officers.  
 20 A. Yes.  
 21 Q. That's Mr Forsyth and his team?  
 22 A. Yes.  
 23 Q. Now, do you have any recollection of them being  
 24 consulted about this change in the categorisation of  
 25 risk?

1 A. I don't remember that that happened, I was just aware  
 2 that, from Mr Skelton's feedback, that they were on the  
 3 same page, so to speak, in terms of they thought Mr Khan  
 4 was complying and doing well, so I don't know that they  
 5 were consulted specifically about us reducing his risk.  
 6 Q. It's quite a different thing, isn't it, to be on the  
 7 same page in general terms and approving a change in the  
 8 categorisation of risk?  
 9 A. It is, although it's --  
 10 Q. So you've got no recollection, you can't give any  
 11 evidence to suggest that they were actively consulted  
 12 about the change from very high to high?  
 13 A. Again, they may have been, but I don't know that for  
 14 a fact, no.  
 15 Q. Is the same answer applicable to any discussions with  
 16 any counter-terrorism police: you don't remember them  
 17 being consulted but they might have been?  
 18 A. Yes, again, the same answer, yes.  
 19 Q. But you say you don't remember any pushback from any  
 20 police agency?  
 21 A. No, again, through attending some of the MAPPAs and  
 22 feedback from Mr Skelton, I was aware that police,  
 23 again, had the same opinion, as far as I was aware,  
 24 about good compliance and engagement.  
 25 Q. Now, is it correct that the OASys risk assessment should

1 be reviewed when there's any significant change?  
 2 A. Yes.  
 3 Q. And is an example of such significant change when  
 4 an offender such as Khan leaves approved premises, so  
 5 goes out of the hostel --  
 6 A. Yes.  
 7 Q. -- and goes into privately rented, perhaps,  
 8 accommodation?  
 9 A. Yes.  
 10 Q. And if we could have up, please, {DC6717/1}, which is  
 11 an email dated 3 September 2019, and this is from you,  
 12 and you sent it to Calum Forsyth, Lois Gell and  
 13 Kenneth Skelton, and you copied in some others,  
 14 including Mr Johal, from whom we'll be hearing later,  
 15 and this was sent on 3 September 2019, wasn't it?  
 16 A. Yes.  
 17 Q. And you say this, just starting in that first line:  
 18 "We are at a point of transition for Usman given he  
 19 will be moving on from the AP [approved premises] soon  
 20 which is always a critical stage so the timing isn't  
 21 great so I would certainly support him being assigned  
 22 another mentor if possible."  
 23 For context, I believe you were responding to the  
 24 news that the mentoring contract had been terminated?  
 25 A. Yes.

1 Q. So at this point, 3 September, you knew that the move  
 2 out of approved premises was coming up?  
 3 A. Yes.  
 4 Q. We know it happened on 24 September.  
 5 A. Yes.  
 6 Q. So isn't this exactly the sort of situation where there  
 7 should be a review of the OASys risk assessment?  
 8 A. Yes.  
 9 Q. So there clearly should have been, by your own  
 10 definition, and it didn't happen, did it?  
 11 A. It was on course to happen and I believe we -- a review  
 12 of the case is about the OASys, but it's about  
 13 everything else as well so, as I said before, the case  
 14 is always under a constant review really, but the idea  
 15 was Mr Skelton was going to complete the ERG assessment  
 16 to better inform that OASys, so the decision was made to  
 17 delay the OASys a little bit until the completion of  
 18 that to potentially better inform the OASys.  
 19 Q. Well, we can ask him about the ERG, but am I right in  
 20 understanding that by this point he had had the  
 21 interviews that he used for the preparation of that ERG?  
 22 A. I'm not sure, to be honest I don't know.  
 23 Q. But do you think that's acceptable for there to be  
 24 essentially a three-month delay with no updating of the  
 25 OASys risk assessment?

1 A. Ordinarily I would say no, but in this case I do think  
 2 it's defensible, because of the reasons to do with the  
 3 ERG and also I think the important thing is how Mr Khan  
 4 is being managed and that delay in completing the OASys  
 5 didn't have any bearing in terms of how he was  
 6 supervised or his licence conditions; they would remain  
 7 exactly the same.  
 8 Q. So is it your evidence that he was managed on the basis  
 9 of him being high risk until the attack at  
 10 Fishmongers' Hall?  
 11 A. Yes, and in reality, whether he was assessed as very  
 12 high risk or high risk, the management of him would have  
 13 been exactly the same. There was no dropping of  
 14 conditions or restrictions because of that reduction in  
 15 risk, it would have been exactly the same.  
 16 Q. Now, I appreciate that you may have been somewhat out of  
 17 the loop, but I'm sure you have familiarised yourself  
 18 with what happened in October and November of 2019?  
 19 A. Yes.  
 20 Q. Do you not think that an updated risk assessment might  
 21 have picked up this isolation that was being noted by  
 22 some of the professionals involved with him?  
 23 A. Well, I think that had already been noted that there was  
 24 potential isolation.  
 25 Q. Well, it was noted; it might have fed into the

1 assessment of risk and therefore fed into the way that  
 2 he was managed?  
 3 A. Potentially.  
 4 Q. Also that he seems to have been lacking any great  
 5 purpose in his day-to-day life, spending time in the gym  
 6 but perhaps more time playing his Xbox; that would be  
 7 picked up, wouldn't it, and would feed into a risk  
 8 assessment?  
 9 A. Yes, potentially, yes.  
 10 Q. Wouldn't the fact that he was still unemployed, despite  
 11 lots of efforts to get him work, and the effect that  
 12 might have on him psychologically, that would be picked  
 13 up, wouldn't it?  
 14 A. Yes.  
 15 Q. And the absence of mentoring, again, if you like, that  
 16 loss of a potentially protective factor, that would be  
 17 picked up, wouldn't it, and fed into the risk  
 18 assessment?  
 19 A. Yes, although I don't think -- we weren't particularly  
 20 clear whether another mentor might be actually assigned  
 21 at that point, or there was --  
 22 Q. Well, we know that no mentoring took place  
 23 in September, October and November.  
 24 A. Okay.  
 25 Q. And that lack of mentoring would have meant the absence

1 of a potentially protective factor?  
 2 A. Yes.  
 3 Q. So do you think it's reasonable to say that even if the  
 4 impression had been formed, rightly or wrongly, that  
 5 things were going well earlier in the year, the first  
 6 half of 2019, a critical look at those last few months  
 7 would have given rise to a very different picture?  
 8 A. I'm not sure about a very different picture. From what  
 9 I understand, he was -- with lots of serious offenders  
 10 when they move on from approved premises they  
 11 potentially face difficulties of isolation and  
 12 employment, so we were putting things in place, so far  
 13 as I'm aware, to try and counter that, so his work with  
 14 Ixion, for example, and DWP, so we were -- as far as my  
 15 understanding is those issues we were aware of and we  
 16 were trying to counter those problems.  
 17 Q. Obviously you weren't involved in those, were you?  
 18 A. No.  
 19 Q. And you weren't involved in significant discussions  
 20 in September, October or November?  
 21 A. No.  
 22 Q. Now, we will be hearing about the ERG that was prepared  
 23 by Mr Skelton with some input from Mr Johal. Am I right  
 24 before the attack you had not read the draft?  
 25 A. No.

1 Q. And you had no input into the contents of that report?  
 2 A. No.  
 3 Q. Did you become aware subsequently of the ultimate  
 4 conclusion of what seems to be a low risk of harm?  
 5 A. Again, yes, I hadn't read it, but again, that would have  
 6 been my understanding, yes.  
 7 Q. You would have disagreed with that if you had seen that,  
 8 wouldn't you?  
 9 A. With low level, did you say, sorry?  
 10 Q. Yes.  
 11 A. Yes, I wouldn't have described him as a low level of --  
 12 low risk of serious harm.  
 13 Q. Your evidence is at the very least he remained at high  
 14 risk of serious harm up until the attack?  
 15 A. Yes.  
 16 Q. Were you content as a supervisor that there was no  
 17 expert psychological input into the ERG assessment?  
 18 A. Yes.  
 19 Q. It didn't concern you that it was really all put on  
 20 Mr Skelton's shoulders, he's having to work day-to-day  
 21 with Khan and build relationships, did you not see the  
 22 benefit of having someone with that expertise, someone  
 23 outside of the day-to-day management to give their  
 24 input?  
 25 A. Yes, and that's why Mr Johal was helping the ERG and we

1 wanted to afford Mr Skelton some time to complete it,  
 2 because we were aware, although he's a very experienced  
 3 officer, it is a lengthy process.  
 4 Q. So you felt that Mr Johal, if you like, was providing  
 5 that more arm's length input into the process, did you?  
 6 A. I think, yes -- yes.  
 7 Q. And did you rely upon him to do that, to assist  
 8 Mr Skelton in that way?  
 9 A. It was collaborative, yes.  
 10 Q. Now, you have been asked questions about the  
 11 Fishmongers' Hall event itself. Would you accept that  
 12 it's remarkable that Mr Skelton's supervisor would be so  
 13 ignorant about an event such as this at the time?  
 14 A. I think because he was being managed at level 3 --  
 15 perhaps if I give you some context. In the other cases  
 16 in my team, a lot of decisions would be made by me in  
 17 conjunction with the probation officer. With this  
 18 particular case, because he was MAPPA level 3, that was  
 19 almost -- obviously myself and Mr Skelton were a part of  
 20 that process, but decisions were generally made at  
 21 MAPPA. So myself and Mr Skelton might discuss things,  
 22 but ultimately the conclusion was always: this needs to  
 23 go to MAPPA, we'll get people's opinions and we'll reach  
 24 a consensus decision, so that's what I would have  
 25 expected Mr Skelton to do and that's what happened,

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1 I understand.  
 2 Q. So really in relation to that event, it wasn't for you  
 3 to supervise whether he went or under what conditions,  
 4 that was a matter for MAPPA?  
 5 A. Well, had I been at the -- I was still part of it, you  
 6 know, I'm Mr Skelton's SPO, and had I been at MAPPA,  
 7 I would have been part of those discussions as well.  
 8 Q. And we know that you weren't part of it, were you, and  
 9 we know that there was no documented discussion with  
 10 Mr Skelton about it either?  
 11 A. No.  
 12 Q. So you didn't know -- you had no idea about the scale of  
 13 the event so that there could be over 100 people  
 14 attending?  
 15 A. I didn't know.  
 16 Q. No. You didn't know the location and its proximity to  
 17 London Bridge?  
 18 A. No.  
 19 Q. You had no idea whether or not Usman Khan was going to  
 20 be escorted by police to the event?  
 21 A. No, I didn't know that.  
 22 Q. Or even searched the night before the morning?  
 23 A. No.  
 24 Q. You didn't know whether or not any of the local police  
 25 force, the City of London Police, Metropolitan Police

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1 were going to be notified?  
 2 A. No.  
 3 Q. Or if there were any discussions with the owners of the  
 4 hall?  
 5 A. No.  
 6 Q. Or the organisers of the event?  
 7 A. No.  
 8 Q. You knew nothing about whether there was any security  
 9 whatsoever in place?  
 10 A. No.  
 11 Q. Whether Mr Khan would be able to walk in without his  
 12 bags being checked?  
 13 A. Well, again, I didn't know the event was taking place.  
 14 Q. All right. It's just important, though, to pick out  
 15 what you didn't know.  
 16 A. Yes.  
 17 Q. If you had known those things, not knowing the event  
 18 took place, but known the things that you might have  
 19 known, you would have objected to him going, wouldn't  
 20 you?  
 21 A. No, again, the impression I was getting was that he was  
 22 doing well and Learning Together was a particularly  
 23 valuable part of that release plan, so I think it would  
 24 have been difficult to keep refusing Mr Khan to do  
 25 things because that could be counterproductive and could

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1 potentially increase his risk as well, it might  
 2 potentially increase that grievance thinking. So,  
 3 again, this seemed to be a good -- this seemed to be  
 4 a protective factor.  
 5 Q. Well, we can agree to disagree about whether he should  
 6 have attended at all, but would you accept that he could  
 7 get the benefits of attending but with much greater  
 8 security via a large number of other steps being taken,  
 9 the ones that I ran through, for example?  
 10 A. Again, with hindsight, yes.  
 11 Q. I mean hindsight: if you had known he was going, if you  
 12 could properly conclude it was good for him to attend,  
 13 you could easily have taken any of the steps that I just  
 14 ran through to provide a level of security that might  
 15 have prevented(?) this attack?  
 16 A. Potentially that could have been discussed at MAPPA,  
 17 yes.  
 18 Q. Do you accept that there was a failure in your  
 19 supervision of Mr Skelton in relation to Mr Khan?  
 20 A. No.  
 21 MR PITCHERS: Thank you. I have no further questions.  
 22 JUDGE LUCRAFT: Thank you very much.  
 23 Questions by MR ARMSTRONG  
 24 MR ARMSTRONG: Thank you, Mr Bromley.  
 25 My name is Nick Armstrong and I ask questions on

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1 behalf of the family of Jack Merritt.  
 2 Can I just pick up a couple of things that Mr Hough  
 3 and Mr Pitchers have both asked you about. Just one  
 4 thing: you just told Mr Pitchers that you -- there were  
 5 three TACT offenders on your list in the period that  
 6 we're concerned about.  
 7 A. Yes.  
 8 Q. And you referred to them being co-defendants?  
 9 A. Yes.  
 10 Q. Because he was sentenced in a group and then a number of  
 11 them were then released?  
 12 A. Yes.  
 13 Q. Just to be clear about one of them. One of them was  
 14 Mohibur Rahman and he came out ahead of Mr Khan, he was  
 15 the first released, wasn't he?  
 16 A. Yes.  
 17 Q. Because he received a five-year sentence, so a shorter  
 18 sentence?  
 19 A. Yes.  
 20 Q. But he was then recalled and re-sentenced for terrorism,  
 21 wasn't he?  
 22 A. Yes. Yes.  
 23 Q. Arrested in August 2016, convicted in August 2017, and  
 24 then given a life sentence?  
 25 A. Yes.

1 Q. So having gone through that experience, first one out,  
 2 recalled, re-sentenced, life sentence, you would have  
 3 wanted to be extremely cautious in the approach that you  
 4 took when somebody else was released in December 2018?  
 5 A. Yes, I mean I wasn't personally involved in that case,  
 6 but I was aware of it, yes.  
 7 Q. I imagine it would have been difficult to be in  
 8 Staffordshire probation without being aware of it?  
 9 A. Yes.  
 10 Q. Now, however, when you hand over to Mr Skelton in 2017,  
 11 in May 2017, I'm just going to press you a little on  
 12 this, Mr Hough asked you your offence formulation for  
 13 this case was that this was a man who had deeply held  
 14 extremist ideology, he had had that since he was  
 15 a teenager, he had had it throughout his prison  
 16 sentence, and Mr Hough asked you: did he, in your  
 17 assessment, retain that extremist ideology, and you  
 18 said:  
 19 "I didn't think he was a reformed character, so some  
 20 potential for that might still be present".  
 21 It's a bit more than that, isn't it? A bit more  
 22 than "some potential" for extremist ideology: he is, at  
 23 that time, still in the top 0.1% of the prison  
 24 population for dangerousness; do you agree?  
 25 A. I don't know about the statistics but yes, I take the

1 point that there were still --  
 2 Q. Not just cat A, but high risk cat A. There were only 70  
 3 of them in the country at the time; do you understand?  
 4 A. Okay, yes.  
 5 Q. You told Mr Hough that when you were handing over to  
 6 Mr Skelton, you were highlighting his good progress  
 7 because he had engaged with HII and ERG?  
 8 A. Yes.  
 9 Q. We have seen the HII and we have seen the ERG in some  
 10 detail. The HII said that his progress was  
 11 questionable, and that was in 2015. All of the entries  
 12 that Mr Hough took you to in that 2017 -- and there are  
 13 more -- post-date that, so that doesn't suggest much  
 14 progress, does it?  
 15 A. Maybe not -- well, it's a scale, isn't it? I think we  
 16 thought there was some progress but, again, we didn't  
 17 think it was all that -- you know, it was all completed.  
 18 Q. I'm just sort of -- I want to press you a little bit on  
 19 "some progress". I mean, whatever progress he has made,  
 20 he has remained in the 0.1 category. He has remained at  
 21 the very high risk of harm end of the OASys scale. That  
 22 is not much progress?  
 23 A. I think, again, it was looking at other types of  
 24 offenders, and some offenders won't engage at all with  
 25 their sentence plan. I think the fact that Mr Khan was,

1 at least seemed to be willing to undertake some of  
 2 these, whereas he didn't, I suppose, technically have to  
 3 in terms of once the IEP had been appealed he was going  
 4 to be released at that date anyway, so I think that was  
 5 an encouraging sign that he was still engaging with HII  
 6 and ERG even though perhaps the progress wasn't as good  
 7 as we might have liked, it was -- we saw that as  
 8 positive.  
 9 Q. I do need to press you a little bit more on that,  
 10 because you're saying the fact that he had done any  
 11 engagement at all was seen as progress?  
 12 A. To a degree, yes.  
 13 Q. That's pretty de minimis?  
 14 A. And again, I suppose, it was seen as a work in progress,  
 15 this was a starting point and that he was working  
 16 towards, and it seemed as though he was working with  
 17 professionals and it was going to be a journey, so to  
 18 speak.  
 19 Q. It's going to be very long journey from high risk cat A  
 20 and from very high risk of harm?  
 21 A. Potentially.  
 22 Q. All right. Now, Mr Pitchers has asked you about your  
 23 entries in Delius and the fact that there aren't any  
 24 after August 2019, so I just put that back to you as  
 25 part of the context for this. In May 2019 you're part

1 of this reduction from very high risk to high, and we  
 2 know that high is still alarming, as you accepted to  
 3 Mr Pitchers?  
 4 A. Yes.  
 5 Q. But you know that this is the first time that he dropped  
 6 below very high risk for seven years; yes?  
 7 A. Yes.  
 8 Q. You know his history, you know about the Managing  
 9 Challenging Behaviour Unit, you know about the ERG, you  
 10 know about the continued poor behaviour. You also knew  
 11 about the intelligence that he was going to return to  
 12 his old ways on release; yes? Which is in  
 13 November 2018?  
 14 A. Something like that, yes.  
 15 Q. Because that went to MAPPAs and you knew that.  
 16 Now, you said to Mr Hough that yes, you knew that,  
 17 but you didn't know what to do about it, it wasn't quite  
 18 sure what to make of it?  
 19 A. Well, it was more about, I suppose more context in terms  
 20 of where that intelligence came from and, I suppose, how  
 21 credible it was, and at that time, again, going back to  
 22 Mr Khan's restrictions, these conditions and the work  
 23 that we were doing with him, that was never going to  
 24 change in the sense that the index offences, we knew  
 25 they were serious, and we were treating him as such

1 anyway.  
 2 Q. Can I just ask you this, I mean you're saying you didn't  
 3 know how credible it was: it had been subject to  
 4 a credibility check and it was regarded as being  
 5 reliable in the sense that it couldn't be discounted; do  
 6 you know that?  
 7 A. I didn't realise that.  
 8 Q. You didn't realise that.  
 9 But when you see intelligence of that kind, the  
 10 answer as to what you do about it is now take Mr Khan  
 11 even more seriously when he is released than you  
 12 otherwise would. I mean, everything about this case,  
 13 Mr Bromley, at this point is screaming: be very, very  
 14 careful, isn't it?  
 15 A. Yes.  
 16 Q. Now, that's the context about which I just need to put  
 17 this to you: you downgrade him from very high to high,  
 18 and you do it, as you've explained to Mr Pitchers,  
 19 without an OASys. There's no fresh OASys done at that  
 20 stage?  
 21 A. Yes.  
 22 Q. And that's why -- and the fact that you hadn't done that  
 23 is why the IT system defaults back to very high.  
 24 A. Yes.  
 25 Q. Because it doesn't want you to do that without carrying

1 out an OASys assessment?  
 2 A. It was a technical thing, but yes.  
 3 Q. But that's an indicator that you shouldn't change the  
 4 OASys until you have completed a new OASys?  
 5 A. Yes.  
 6 Q. The reason you do that is you want to wait for the ERG,  
 7 but that is not complete, is it?  
 8 A. No.  
 9 Q. Now, we will see, and we'll deal with it with others,  
 10 but this was a request from MAPPAs in July 2019 to do it.  
 11 Do you have any idea why it took until July to complete  
 12 a new ERG, because we're now eight months on from  
 13 release and now we're more than a year after the last  
 14 one?  
 15 A. As far as I'm aware, it's -- an ARMS would be completed  
 16 when there's a significant event such as -- I think we  
 17 spoke about moving on from the approved premises so, it  
 18 was tying in with that, really.  
 19 Q. All right. We know and we will hear, and we'll see it  
 20 in aspects of Mr Skelton's evidence, that interviews  
 21 took place in July and August 2019. Can I just also  
 22 just show you this, because things were beginning to  
 23 drag, and I know this isn't your document, this is  
 24 a note of somebody who attended one of the MAPPAs panels  
 25 in August, can I just see {DC7490-T/1}, please. This is

1 a police note from Staffordshire Police, as you can see,  
 2 and I just want to go to {DC7490-T/10}, if I may.  
 3 MR HOUGH: It's actually a different document, it's a  
 4 transcript, but it is that prefix plus T and then 10  
 5 {DC7490-T/10}.  
 6 MR ARMSTRONG: Sorry, thank you. So T/10. If you just look  
 7 about a third of the way up from the bottom, this is a  
 8 note. This is the panel, and we will see other entries  
 9 in a minute, but the ERG -- and I know you are not there  
 10 and I know it's not your document but it is just to make  
 11 this point:  
 12 "ERG -- started -- [and is] being written up.  
 13 "Comp[lete] [is what 'comp' I assume means] [for]  
 14 the next panel."  
 15 This is on 22 August 2019, there wasn't a MAPPAs  
 16 panel in September 2019, it hadn't been completed by  
 17 3 October or by 14 November, and it wasn't done by the  
 18 time of the attack on 29 November. Any idea why that  
 19 was dragging?  
 20 A. I can only assume it was probably two reasons in so much  
 21 Mr Skelton's workload, which is -- most probation  
 22 officers are working at a very difficult workload, over  
 23 100%, and the ERG, from what I understand of it, it's  
 24 quite a long document and it was Mr Skelton's first time  
 25 he had produced it, so I think we were probably

1 affording him a bit more time to do it and try and get  
 2 it right.  
 3 Q. Well, Mr Bromley, I know you didn't see this document  
 4 and I will do the detail of this with other people,  
 5 including Mr Skelton, but Mr Skelton's document is  
 6 15 pages long. So this seems to have taken him four  
 7 months to produce a draft of 15 pages, as compared with  
 8 the one from April 2018 which was 54 pages long. Can  
 9 you help us with why that would have taken four months?  
 10 A. Again, in terms of the workload for a community-based  
 11 probation officer is such that Mr Skelton had quite  
 12 a lot of other cases as well that he would have had to  
 13 deal with, so I can only imagine that that was at least  
 14 in part, he had other responsibilities as well, and  
 15 I think if Mr Johal was helping him, there might have  
 16 been issues with coordinating diaries and things like  
 17 that, potentially.  
 18 Q. I will go through the detail of this with others, but  
 19 I'm putting this to you as the line manager, because  
 20 what I'm putting to you is, we have a man who comes out  
 21 in extraordinary circumstances from very high risk cat  
 22 A, in circumstances where you accept from me you need to  
 23 be very, very careful and you want to be even more  
 24 careful because the first guy out did it again.  
 25 We are now going through fairly serious stages here.

1 I mean, we are now heading into the patch where he comes  
 2 out of approved premises. We're going to get into  
 3 issues with the mentor stopping, that Mr Pitchers asked  
 4 you about, and we're going to get into some reports of  
 5 concerns that Mr Hough asked you about as we head  
 6 into November 2019. But we go through the whole of that  
 7 period without either of the significant structured  
 8 decision-making tools, OASys or ERG, being completed.  
 9 All of it is done without that. That has to be  
 10 a significant failure, doesn't it?  
 11 A. It's not ideal, I accept that it's not ideal, but I go  
 12 back to the point that, at least as far as I was  
 13 concerned, that there was still a top level of oversight  
 14 and restrictions around him from the licence and from  
 15 MAPPA, so I accept that it should have been completed  
 16 sooner, but for me I think the bottom line was  
 17 always: are the licence conditions still in place, is he  
 18 being monitored by us, by probation and by police, and  
 19 is there still that oversight from MAPPA.  
 20 Q. But it's more difficult than that, isn't it, I'm going  
 21 to put that to you, it's not just about licence  
 22 conditions --  
 23 A. No.  
 24 Q. -- and making sure he complies with curfews and make  
 25 sure he turns up to the right address and uses the

1 internet or doesn't. What this is about is this: you  
 2 said to Mr Hough, again, that the feedback that you were  
 3 receiving, and this is the reason why things were  
 4 relaxed, was he seemed to be making good progress. So  
 5 seemed to be making good progress. Now that is because  
 6 he has basically remained compliant and quiet for those  
 7 months?  
 8 A. That's certainly part of it.  
 9 Q. Which is the absence of a negative?  
 10 A. Yes.  
 11 Q. What we are interested in in a case of this kind,  
 12 I'm going to suggest to you, is proper intensive  
 13 analysis of has he actually done any work, has he  
 14 actually done any change on the things that caused his  
 15 offending, so his ideology, his rigid thinking, his  
 16 teenage-like behaviour, his need for status, his  
 17 deception, his minimisation of his behaviour on talking  
 18 about things like -- there's no sign at all that he has  
 19 done any of that work, is there?  
 20 A. Again, from some of the work he did in custody I think  
 21 perhaps some of those might have been addressed, but  
 22 maybe not all of it.  
 23 Q. April 2018 raises concern, the ERG raises concern about  
 24 those matters. We don't have another structured tool  
 25 that works through those things to track progress

1 against what leva Cechaviciute finds in April 2018.  
 2 That structured decision-making, so important in a case  
 3 of this kind, absent for a year. That's a significant  
 4 failure.  
 5 A. In terms of -- I mean, Mr Skelton would have been  
 6 working with Mr Khan on lots of different things to do  
 7 with accommodation, to do with employment, as well as  
 8 exploring some of this work to do with his attitudes and  
 9 thinking, that was always going to be a work in  
 10 progress.  
 11 Q. We don't have in Delius any entries that tell us when  
 12 the ERG interviews were conducted. Mr Skelton's witness  
 13 statement tells him they were done in July and August  
 14 and that's consistent with the document saying he was  
 15 just writing up in August, which means there aren't even  
 16 any ERG conversations, never mind any written down ones  
 17 or an analysis, after he leaves approved premises. Do  
 18 you see, again, you see why I'm putting these points to  
 19 you?  
 20 A. Yes.  
 21 Q. It looks bad?  
 22 A. It doesn't look ideal, yes.  
 23 MR ARMSTRONG: Thank you, Mr Bromley, I don't think I can  
 24 take it any further.  
 25 JUDGE LUCRAFT: Thank you very much.

1 Questions by LEEK QC  
 2 MS LEEK: Mr Bromley, as you know, I ask questions on behalf  
 3 of the Ministry of Justice --  
 4 A. Yes.  
 5 Q. -- and the Home Office. I just want to ask you  
 6 questions about your working together with Ken Skelton  
 7 and the CT probation team. A few questions about MAPPA,  
 8 and then I want to talk to you about licence conditions.  
 9 First of all, we've heard that you've worked closely  
 10 with Ken Skelton, you spent quite a lot of time working  
 11 with him. Did you find him a conscientious offender  
 12 manager?  
 13 A. Very much so, yes.  
 14 Q. Was he measured?  
 15 A. Yes.  
 16 Q. Was he considered?  
 17 A. Yes.  
 18 Q. Did you ever have any concerns at all about his approach  
 19 to Usman Khan?  
 20 A. No.  
 21 Q. You've said that when you took on the case of  
 22 Usman Khan, you had dealt with high risk serious  
 23 individuals. Did you feel that you were equipped to  
 24 deal properly with him?  
 25 A. To a degree, yes.

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1 Q. You say "to a degree". What makes you say that?  
 2 A. Because I had experience with dealing with high risk  
 3 offenders in custody and in the community, so there were  
 4 some parallels, but of course it was a different type of  
 5 offending, I appreciated that, and I certainly wasn't  
 6 an expert in those first couple of years, but I was  
 7 intent on -- I wanted to be involved with this area of  
 8 work so I was looking for opportunities to undertake  
 9 training and to gain more understanding and experience  
 10 as I went along.  
 11 Q. We've heard, haven't we, that there were very few TACT  
 12 offenders in Staffordshire at that point?  
 13 A. Yes.  
 14 Q. Did there become more over time?  
 15 A. Not that I'm aware of.  
 16 Q. But did you and your colleagues develop your TACT  
 17 experience and understanding over the time that  
 18 Usman Khan was in custody?  
 19 A. Yes.  
 20 Q. You've been asked about receiving information with  
 21 regard to intelligence from the offender supervisor. Is  
 22 it right that the system has actually now changed and  
 23 there is a system now where there is an offender manager  
 24 in custody?  
 25 A. Yes, that's quite a significant change in the last

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1 12 months where, at the time of Mr Khan's sentence, he  
 2 would have had a probation officer in the community.  
 3 Now anyone sentenced to a long custodial sentence over  
 4 10 months has a probation officer based in the prison so  
 5 they will be able to have a lot more time and input with  
 6 them.  
 7 Q. And it's important that the jury hear about changes that  
 8 have taken place since; is that a radical change since  
 9 2019?  
 10 A. Yes.  
 11 Q. And does that have an effect on the ability to obtain  
 12 and share information?  
 13 A. I don't actually know. I would have hoped so, but  
 14 I don't know.  
 15 Q. Coming to MAPPA, we've heard something about MAPPA  
 16 already, and you were asked to describe what MAPPA  
 17 actually means. Is it right that MAPPA arrangements  
 18 require local criminal justice agencies and other bodies  
 19 dealing with offenders to work together in partnership  
 20 in dealing with the offenders?  
 21 A. Yes.  
 22 Q. And there is something called the responsible authority,  
 23 which is the primary agency for MAPPA?  
 24 A. Yes.  
 25 Q. And the responsible authority is the police, prison and

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1 probation trust in each area working together?  
 2 A. Yes.  
 3 Q. And it is the responsible authority which has a duty to  
 4 ensure that the risks are assessed and managed  
 5 appropriately?  
 6 A. Yes.  
 7 Q. And we've heard that Usman Khan was managed at MAPPA  
 8 level 3. That means that there will be regular meetings  
 9 of the responsible authority agencies?  
 10 A. Yes.  
 11 Q. And that it is managed at this level if senior  
 12 representatives of the relevant agencies attend with the  
 13 authority to commit resources or finances?  
 14 A. Yes.  
 15 Q. You've been asked why you weren't at every meeting, and  
 16 it's right, because at MAPPA level 3, senior  
 17 representatives are required to be present?  
 18 A. Yes.  
 19 Q. More senior than you?  
 20 A. Yes.  
 21 Q. But you went in any event because of your ongoing  
 22 involvement with the case?  
 23 A. Yes.  
 24 Q. The MAPPA agencies, responsible authority, together have  
 25 to assess the risk that the offender poses, and then

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1 have to manage the risk between them?  
 2 A. Yes.  
 3 Q. And that entails the preparation of a risk management  
 4 plan?  
 5 A. Yes.  
 6 Q. So far as risk assessment is concerned, the MAPPA  
 7 guidance sets out that risk assessment is a dynamic  
 8 process?  
 9 A. Yes.  
 10 Q. That requires ongoing re-evaluation in the context of  
 11 the offender's changing circumstances?  
 12 A. Yes.  
 13 Q. Does that include having regard to intelligence?  
 14 A. Yes.  
 15 Q. Considering whether it is historic or current?  
 16 A. Yes.  
 17 Q. Looking at evidence of conduct?  
 18 A. Yes.  
 19 Q. Current and historic?  
 20 A. Yes.  
 21 Q. And looking at compliance with licence conditions?  
 22 A. Yes.  
 23 Q. The risk management plan will include four aspects:  
 24 supervision, monitoring and control, interventions and  
 25 treatment, and victim safety.

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1 A. Yes.  
 2 Q. Is that right?  
 3 A. Yes.  
 4 Q. And those are the matters that the MAPPA agencies will  
 5 consider when determining how to manage risk in the  
 6 community?  
 7 A. Yes.  
 8 Q. Supervision can include a number of matters, such as  
 9 home visits by police and probation?  
 10 A. Yes.  
 11 Q. Interaction with staff at approved premises?  
 12 A. Yes.  
 13 Q. Help finding work, education, and actions to build on  
 14 protective factors?  
 15 A. Yes.  
 16 Q. Monitoring and control; are these strategies aimed at  
 17 reducing opportunities for harmful behaviour?  
 18 A. Yes.  
 19 Q. And we have to bear in mind here that we are not dealing  
 20 with somebody within the confines of a prison, but you  
 21 are managing them in the community?  
 22 A. Yes.  
 23 Q. The use of licence conditions comes under monitoring and  
 24 control?  
 25 A. Yes.

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1 Q. Restriction on association, activities and movements?  
 2 A. Yes.  
 3 Q. And that might also include surveillance and electronic  
 4 monitoring, for example?  
 5 A. Yes.  
 6 Q. And does the MAPPA guidance state --- we don't need to  
 7 take it up on screen --- that restrictions such as  
 8 licence conditions must be necessary and proportionate?  
 9 A. Yes.  
 10 Q. In other words, licence conditions must be restricted or  
 11 limited to the minimum necessary for effectively  
 12 managing the risks presented by the offender?  
 13 A. Yes.  
 14 Q. But clearly this should not take precedence over  
 15 protecting the public?  
 16 A. Yes.  
 17 Q. The proportionate protection of the public, it is said  
 18 in the MAPPA guidance, outweighs all other  
 19 considerations when constructing a risk management plan?  
 20 A. Yes.  
 21 Q. Just looking at licence conditions. We've heard little  
 22 about licence conditions so far, but just to set the  
 23 scene, are licence conditions the set of rules that  
 24 prisoners must follow if they are released from prison  
 25 but still have a part of their sentence to serve in the

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1 community?  
 2 A. Essentially, yes.  
 3 Q. And are the aims of a period on licence to protect the  
 4 public, to prevent re-offending, and to secure the  
 5 successful reintegration of the individual back into the  
 6 community?  
 7 A. Yes.  
 8 Q. Licence conditions are not a form of punishment; is that  
 9 right?  
 10 A. Yes, they're not punishment, yes.  
 11 Q. And they have to be reasonable, proportionate and  
 12 necessary?  
 13 A. Yes.  
 14 Q. And is that sometimes described as "defensible"?  
 15 A. Yes.  
 16 Q. If you retain the most stringent licence conditions,  
 17 might it frustrate the process of reintegrating the  
 18 individual back into the community?  
 19 A. Yes, it can be a difficult balance.  
 20 Q. Because they couldn't access education, for example?  
 21 A. Yes.  
 22 Q. Couldn't get a job?  
 23 A. Yes.  
 24 Q. Couldn't go into shops, for example?  
 25 A. Yes.

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1 Q. And might it also, if retaining the most stringent  
 2 licence conditions, fuel personal grievance?  
 3 A. Yes.  
 4 Q. And can that increase rather than decrease the risk of  
 5 re-offending?  
 6 A. Yes.  
 7 Q. Just explain to the jury the difficult balance that you  
 8 have to carry out here between protecting the public and  
 9 reintegrating somebody back into the community?  
 10 A. Yes, in Mr Khan's case the priority is of course  
 11 protecting the public with those licence conditions, and  
 12 he had quite a lot -- we have generally seven standard  
 13 licence conditions that every offender who comes out of  
 14 prisons will have, which is sort of to be of good  
 15 behaviour, to receive home visits, not to leave the UK,  
 16 things like that. Then we can also apply additional  
 17 licence conditions, more bespoke ones, depending on the  
 18 nature of the offence. I would say that most high risk  
 19 offenders have probably between, I would say four and  
 20 maybe ten additional licence conditions, but Mr Khan had  
 21 about 16 or 17, I think.  
 22 So that makes it a lot of restrictions on him, for  
 23 obvious reasons, but of course the other part of our job  
 24 is to try and support someone in gaining education or  
 25 employment and reintegrating back into the community,

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1 which can be a difficult balance.  
 2 Q. As we've heard, in Usman Khan's case, the most stringent  
 3 conditions were initially imposed and then reviewed  
 4 regularly?  
 5 A. Yes.  
 6 Q. And the balance is so difficult because the future  
 7 intentions of offenders are never clear?  
 8 A. No.  
 9 Q. From the time of Usman Khan's release from prison until  
 10 he moved out of the approved premises, did anything  
 11 about his behaviour give any cause for concern?  
 12 A. No.  
 13 Q. Was he complying with his licence conditions?  
 14 A. Yes.  
 15 Q. And those conditions included not accessing the internet  
 16 without supervision?  
 17 A. Yes.  
 18 Q. Not having a phone, for example, with internet access on  
 19 it?  
 20 A. Yes.  
 21 Q. And did it mean adhering to a strict curfew?  
 22 A. Yes.  
 23 Q. And did it mean signing on at the approved premises at  
 24 various times of day?  
 25 A. Yes.

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1 Q. How did you and Mr Skelton view his compliance?  
 2 A. We viewed that it was good compliance. With such a lot  
 3 of licence conditions it can be difficult to follow all  
 4 of those, and there might have been -- offenders  
 5 sometimes get a little bit annoyed about them and  
 6 there's a little bit of pushback, that's fairly common.  
 7 So I think Mr Khan would have had those conversations  
 8 with Mr Skelton, but we would have remained, you know,  
 9 firm, firm on them.  
 10 Q. And during that time, he would have been allowed, for  
 11 example, to go into a supermarket or go to the gym or go  
 12 into a café without restriction?  
 13 A. Yes.  
 14 Q. Could he have gone to a different city without  
 15 restriction?  
 16 A. Depending on the mode of transport, he could have done.  
 17 So he couldn't have entered a railway station or a port  
 18 or an airport, but, for example, he could have got on a  
 19 bus or a coach or in a car; he wasn't prohibited from  
 20 doing that.  
 21 Q. How did you view his engagement overall with  
 22 Learning Together?  
 23 A. From what I understood, as I have said, it did seem a  
 24 positive step and a protective factor. It seemed like  
 25 a good opportunity for him, as I understood it.

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1 Q. I just want to ask you about OASys. Mr Pitchers asked  
 2 you a series of questions about issues that he suggests  
 3 might have been picked up by an OASys assessment.  
 4 First of all, is it right that an OASys assessment  
 5 and Extremism Risk Guidance are two factors which will  
 6 feed into MAPPA's overall management of the case?  
 7 A. Yes.  
 8 Q. One is not entirely reliant on one or the other?  
 9 A. No.  
 10 Q. But Mr Pitchers suggested to you that the fact that he  
 11 was still unemployed would have been picked up by  
 12 an OASys assessment. Was the fact that he was still  
 13 unemployed known to MAPPA?  
 14 A. Yes, everybody knew that. Yes.  
 15 Q. And the fact that there were issues surrounding  
 16 mentoring, was that known to MAPPA?  
 17 A. Yes.  
 18 Q. The fact that his life may have been lacking purpose,  
 19 was that also known to MAPPA?  
 20 A. Yes.  
 21 Q. And the fact of his perceived risk in the community was  
 22 also known to MAPPA?  
 23 A. Yes.  
 24 Q. So despite the fact that the ERG and OASys had not yet  
 25 been completed, was each of these individual factors

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1 known to the group that was responsible for the  
 2 management of Mr Khan within the community?  
 3 A. Yes.  
 4 Q. And had they wanted to know anything else, then could  
 5 individual probation staff have made further enquiries?  
 6 A. Yes.  
 7 Q. And provided that information back to the MAPPA panel?  
 8 A. Absolutely, yes.  
 9 MS LEEK: Thank you.  
 10 Sir, I've no further questions.  
 11 JUDGE LUCRAFT: Thank you very much.  
 12 Further questions by MR HOUGH QC  
 13 MR HOUGH: Just one matter. You were asked about risk  
 14 management in the context of MAPPA. Is it right to say  
 15 that each set of MAPPA minutes will record the current  
 16 OASys risk assessment levels, including an assessment of  
 17 very high risk or high risk to the general public?  
 18 A. Yes.  
 19 Q. With a summary of some of the rationale behind that  
 20 assessment?  
 21 A. Yes.  
 22 Q. Is it also right that there will be a separate section  
 23 in the MAPPA minutes setting out the MAPPA risk  
 24 management plan to which Ms Leek just referred in her  
 25 questions?

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1 A. Yes.  
 2 Q. So the participants in the MAPPA meeting will be able to  
 3 look at both aspects of the risk management assessment,  
 4 and because of their function in checking minutes, would  
 5 be expected to do so?  
 6 A. Yes.  
 7 MR HOUGH: Thank you very much.  
 8 Sir, those are all my questions.  
 9 JUDGE LUCRAFT: Thank you very much, Mr Hough.  
 10 I think, just on the dot of 1 o'clock, or just  
 11 after, Mr Bromley, thank you very much indeed for  
 12 coming. Thank you.  
 13 We'll sit again, members of the jury, at 2 o'clock.  
 14 Thank you.  
 15 (In the absence of the jury)  
 16 I'll rise.  
 17 (1.04 pm)  
 18 (The short adjournment)  
 19 (2.03 pm)  
 20 JUDGE LUCRAFT: Yes, Mr Hough.  
 21 MR HOUGH: The next witness is Mr Sumeet Johal.  
 22 MR SUMEET JOHAL (sworn)  
 23 JUDGE LUCRAFT: Good afternoon, Mr Johal. If you wish to  
 24 take a seat to give evidence, that's fine. Sit or  
 25 stand, whichever you prefer.

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1 A. I'll take a seat, thank you.  
 2 JUDGE LUCRAFT: The important thing is, the microphone in  
 3 front of you will help to amplify your voice. We all  
 4 have a tendency to talk a bit quieter when we sit down,  
 5 but if you can make sure you keep your voice nice and  
 6 loud and clear so we can all hear.  
 7 A. Yes, thank you.  
 8 Questions by MR HOUGH QC  
 9 MR HOUGH: Would you please give your full name.  
 10 A. Sumeet Singh Johal.  
 11 Q. Mr Johal, you understand I'm asking you questions first  
 12 on behalf of the Coroner and then you will be probably  
 13 be asked questions by others. You made a witness  
 14 statement about these matters on 10 February this year,  
 15 and we may refer to that as we go along.  
 16 In November 2019, what was your occupation?  
 17 A. I was a counter-terrorism probation officer.  
 18 Q. By way of background, had you studied a degree in  
 19 criminology and a master's degree in terrorism, security  
 20 and policing as your academic career?  
 21 A. That's correct.  
 22 Q. Had you then joined HM Prison and Probation Service  
 23 initially as a prison officer?  
 24 A. Yes.  
 25 Q. Had you become an offender manager in the Probation

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1 Service in February 2015?  
 2 A. That's correct.  
 3 Q. Within that role, did you have any specialisation in  
 4 terrorist cases?  
 5 A. Yes.  
 6 Q. I think you held a semi specialisation in those sorts of  
 7 cases for between 6 and 12 months, holding a total of  
 8 three terrorist offenders?  
 9 A. That's correct.  
 10 Q. Did you then become a specialist counter-terrorism  
 11 probation officer in December 2018?  
 12 A. Yes.  
 13 Q. In your own words, what is the role of  
 14 a counter-terrorism probation officer? What do you do?  
 15 A. So as a counter-terrorism probation officer we have kind  
 16 of two main functions. So first there are the TACT  
 17 cases that are held by probation officers within the  
 18 divisions that we cover, so I worked within the West  
 19 Midlands and Staffordshire teams, so I would have  
 20 covered Staffordshire and Coventry, Solihull and parts  
 21 of Warwickshire.  
 22 There would be semi specialists, such as Mr Kenneth  
 23 Skelton who held the case, and as counter-terrorism  
 24 probation officer, my role is to provide support to  
 25 them, to assist them in any key decision-making, and

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1 assist wherever required. In that function we obviously  
2 assist with desistance and disengagement programme, and  
3 if there's any issue with their tagging, again, that's  
4 another area we're able to assist probation officers .

5 In — the second part of our job is you will have  
6 regular probation officers holding regular cases, so  
7 individuals that have been convicted of, let's say  
8 robbery offences, or other types of offences. If any of  
9 those individuals start to engage in extremism or start  
10 to evidence any behaviour of concern, it is our role to  
11 then go and support that probation officer in managing  
12 that case. We would then go and do assessments and  
13 interventions as required. We are ERG and HII—trained.  
14 We oversee the completion of those in the community or  
15 support probation officers who are also ERG and  
16 HII—trained as they complete those interventions and  
17 assessments in the community.

18 Q. So focusing on the first of your strands of  
19 responsibility , assisting offender managers working with  
20 terrorist offenders, you identified three aspects to  
21 that strand of responsibility . First of all , helping  
22 with decisions, secondly, helping with the desistance  
23 and disengagement programme; is that the programme under  
24 which mentors are appointed?

25 A. That's correct.

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1 Q. And thirdly, helping with the GPS tagging and the  
2 monitoring of GPS tagging?

3 A. That's correct.

4 Q. You said that as a CT probation officer you would be  
5 trained in the Healthy Identity Intervention, that  
6 programme, and the ERG, Extremism Risk Guidance  
7 assessment tool?

8 A. Yes, that's correct.

9 Q. When were you personally trained in both those aspects?

10 A. I believe it was in 2018, the earlier stages of 2018.

11 Q. Now, you had, of course, taken responsibility for  
12 terrorist offenders before you came to work in relation  
13 to Usman Khan, but you had not been doing the job of  
14 a counter—terrorism probation officer for very long  
15 before you became involved in his case, had you?

16 A. That's correct.

17 Q. But based on what you've told me, the training that you  
18 received in HII and ERG would also have been relatively  
19 shortly before you took responsibility for him; is that  
20 right?

21 A. That's correct.

22 Q. Is it right that you, like other probation staff, would  
23 record your decisions and significant information on the  
24 Delius system?

25 A. Yes, so if we had any interventions with the case

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1 specifically around any actions in terms of our job  
2 role, we would apply an entry on Delius.

3 Q. When did you first become involved as  
4 a counter—terrorism probation officer with the case of  
5 Usman Khan?

6 A. So as soon as I'd taken over, I had a handover from my  
7 colleague, Michelle Thompson, and the very first stages  
8 were to discuss the cases that we had either in the  
9 community or in custody coming up for release, so that's  
10 when I first came across Usman Khan.

11 Q. How many other TACT offenders came into your caseload at  
12 that time when you took over responsibility?

13 A. It would have been Mr Khan, all of his co—defendants.  
14 But in Staffordshire alone there was an additional two  
15 or three other TACT cases, and then in the other parts  
16 of the Midlands there was at least another three cases  
17 there as well .

18 Q. So how many is that in total, about 10 or a dozen?

19 A. Potentially, yes. There are additionally a lot of cases  
20 that are on long term, life sentences, et cetera, so  
21 that's my accurate recollection of how many cases there  
22 were, but there may be a few more.

23 Q. So your job involved both assisting the offender  
24 managers in relation to those cases and providing this  
25 further element of work which you've described,

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1 assisting in non—terrorist cases where there was a risk  
2 of the offender engaging with extremism?

3 A. That's correct.

4 Q. Is it right that your predecessor in the role of CT  
5 probation officer for Usman Khan was a lady called  
6 Michelle Thompson?

7 A. That's correct.

8 Q. At the time of you taking over, what did you do to  
9 prepare and arm yourself with information about  
10 Usman Khan?

11 A. So at the point of taking over, I can't recollect  
12 specifically what I did, but I recall for all cases  
13 I would have read through all the available assessments,  
14 such as OASys and ERGs, HII post—programme reports, as  
15 well as having a shadowing of cases, shadowing of MAPPA  
16 meetings, and in—depth kind of handovers and discussions  
17 with the semi—specialist probation officers where  
18 possible .

19 Q. Would you have read the Delius notes on that particular  
20 offender up to that point in time?

21 A. I would have read as much as possible at that time and  
22 what I would have considered as pertinent to understand  
23 and get a good grasp of the case.

24 Q. You said you would have done some shadowing of MAPPA  
25 meetings; would you have also read minutes of any MAPPA

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1 meetings which were available up to that point in time?  
 2 A. I think my primary source of updates would have been  
 3 from Lois Gell who was the PCTL, and Michelle Thompson,  
 4 so I had updates of where we were with actually each  
 5 case in MAPPA. I don't believe I read the MAPPA  
 6 minutes.  
 7 Q. Did you, as well as speaking to Ms Thompson, also speak  
 8 to Mr Skelton, the offender manager?  
 9 A. Yes.  
 10 Q. As a result of those discussions, you would have become  
 11 aware of Usman Khan's offences?  
 12 A. At the point of Michelle Thompson highlighting each case  
 13 that we were covering in every TACT case I would have  
 14 become aware of those offences at that point, yes.  
 15 Q. You were responsible for him, and, as you have said, his  
 16 co-defendants. Did you read the Court of Appeal  
 17 judgment which summarised their offences?  
 18 A. I was aware of that, yes. What I would say is that the  
 19 word "responsible" is quite a difficult word to use  
 20 because ultimately only the offender manager is  
 21 responsible for the case. It's an area that I supervise  
 22 and case that I have an interest in, but we don't tend  
 23 to have any real responsibility over decision-making.  
 24 Q. Understood, but perhaps half of the terrorist offenders  
 25 with whom you worked, or in relation to whom you worked,

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1 were the group of defendants convicted alongside  
 2 Usman Khan?  
 3 A. Yes.  
 4 Q. Had you read the judgment of the Court of Appeal  
 5 describing their offences?  
 6 A. I believe I had, yes, at that time.  
 7 Q. Had you read the sentencing remarks of Mr Justice Wilkie  
 8 outlining their offences?  
 9 A. I'm not sure if I would have read it at that specific  
 10 time of taking on the case, but I had had sight of those  
 11 prior to this offence occurring.  
 12 Q. Is it fair to say that you knew from the start that  
 13 Usman Khan's offending had involved, by his own  
 14 admission, conspiring to establish a militant training  
 15 camp in Pakistan which might, in due course, send  
 16 fighters back to commit outrages in the UK?  
 17 A. Yes, I recall reading the basis of plea.  
 18 Q. Did you also become aware from your reading that  
 19 Usman Khan was being released into the community as  
 20 a category A high risk prisoner?  
 21 A. I was aware that he had an upcoming release and I would  
 22 have been aware that he was still in a cat A  
 23 establishment.  
 24 Q. Did you know that he himself was classified as category  
 25 A and high risk?

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1 A. I believe so, yes.  
 2 Q. Did you know at the time that that placed him in  
 3 an unusual and small proportion of the prison  
 4 population?  
 5 A. By virtue of knowing that, yes, I would have known that.  
 6 How much of a small proportion, probably not fully aware  
 7 of, but I would have been aware that it was very  
 8 uncommon for someone to be released in that and  
 9 there wouldn't be that many high risk cat As.  
 10 Q. Did you become aware that there had been numerous  
 11 instances of disruptive behaviour, including some  
 12 violence, over his time in custody?  
 13 A. I think as part of the handover I was aware that there  
 14 had been some significantly problematic behaviour, yes.  
 15 Q. Did you become aware that consistently over his time in  
 16 prison there had been prison intelligence which linked  
 17 him to extremist gangs, radicalisation, and the like?  
 18 A. I think in terms of when -- significantly problematic  
 19 behaviour, I think that was part of that as well, yes.  
 20 Q. Had you become aware that there were signs noted by the  
 21 prison authorities of improvements in his overt  
 22 behaviour in the last two years of his time in prison,  
 23 so 2017 to 2018?  
 24 A. I recall that, yes, there was better engagement with  
 25 authorities and with prison regime type, in terms of

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1 what was available to him in education, yes, but  
 2 I believe I was still aware that there were some  
 3 problems based on his engagement with ERGs and the like.  
 4 Q. Well, set aside for the moment whether he had been  
 5 engaging with assessors.  
 6 A. Yes.  
 7 Q. Did you become aware that even in 2017 and 2018 there  
 8 were quite a number of pieces of intelligence flowing  
 9 into the prison security and counter-terrorist  
 10 departments linking him with organised bullying and  
 11 extremist Islamic gangs in prison?  
 12 A. So from what I can recall, yes, there was a flow of  
 13 information concerning intelligence, yes.  
 14 Q. Were you aware that from 2012 through to 2018 he had  
 15 been the subject of an OASys assessment every year,  
 16 which on every occasion had graded his risk as very high  
 17 to the public at large and the community?  
 18 A. Yes, so I was aware that he was very high risk over that  
 19 period of time.  
 20 Q. Were you aware of a specific piece of intelligence from  
 21 late October 2018 reporting that Usman Khan had said  
 22 that he would return to his old ways, understood to be  
 23 terrorism, after release?  
 24 A. I can't specifically remember that piece of  
 25 intelligence, but I was aware that there was concerning

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1 intelligence .

2 Q. Had you read the MAPPA F forms which fed into the MAPPA

3 meetings in the second half of 2018?

4 A. Yes, so we would receive MAPPA F forms prior to the

5 meeting and as part of MAPPA preparation I would have

6 a read through all of the MAPPA Fs for that day.

7 Q. Now, we know that MAPPA F forms, for the latter half of

8 2018, acknowledged in terms the risks that Usman Khan's

9 improved behaviour may be deceptive compliance, so

10 compliance in order to deceive the authorities .

11 Do you recall that warning being given by the

12 MAPPA F forms?

13 A. I recall concerns around the motivation for his

14 compliance, yes.

15 Q. You had that information, and you've told us about the

16 research you did. Coming to the case anew,

17 in December 2018, what was your view as

18 a counter-terrorism specialist about Usman Khan's risk

19 of both re-offending in general and re-engaging in

20 terrorist activity ?

21 A. So I can recall from taking on those cases and then

22 taking on a number of cases at that point, I didn't

23 physically sit there and prioritise one case over

24 another, or think one case that's coming out is

25 significantly more concerning than another. I treated

1 every case as there is always a risk of re-offending.

2 Given the nature of the index offence, any further

3 re-offending would be significantly severe in nature,

4 given the ideology. So when it comes to Usman Khan, it

5 was the same principles underpinning my attitude towards

6 that release. I was also aware of the decision around

7 the previous IPP sentence and the appeal, so that did

8 cause some concerns.

9 Q. You refer to his appeal, his successful appeal against

10 the sentence of Imprisonment for Public Protection. Was

11 that a concern because it meant he had been released

12 without satisfying a board that he had made real

13 progress?

14 A. Yes, because from my experience at that point in

15 relation to all offenders, if you have a violent

16 offender engaging in violence in custody, when they go

17 before a Parole Board and that intelligence is put

18 before a Parole Board, there's significantly more

19 scrutiny over offence-parallel behaviour, which is

20 when an individual engages in behaviour that they were

21 engaging in at the time of committing the index -- the

22 main offence that they're in prison for. Violence,

23 resorting to violence, would be concerning to any Parole

24 Board and would have had more scrutiny and

25 accountability. So when I'm aware that we now have

1 an individual being released who hasn't been subject to

2 that scrutiny, you have a heightened sense of concern

3 with that individual .

4 Q. Thank you. Dealing with MAPPA meetings in general

5 terms, first of all . There were eight MAPPA meetings

6 between January and November 2019; did you attend all of

7 them?

8 A. I believe I did, yes.

9 Q. What was your role in attending those meetings?

10 A. So part of our role is to stay on top of these cases to

11 understand what's going on, because a probation officer,

12 and certainly in the case of Kenneth Skelton, may not

13 need your support immediately, and if you're not on top

14 of these cases and understanding what decisions are

15 being made, what's going on, you can very quickly kind

16 of fall behind, so we always prioritise MAPPA in our

17 team to be there. Not necessarily to dictate anything

18 or to encourage specific decisions, but just to have

19 a good level of oversight over that case. So we would

20 prepare for that MAPPA meeting, sit in those MAPPA

21 meetings, and where necessary, give our advice around

22 decision-making based on other cases, previous

23 precedents, understanding the risks a little bit

24 further, because probation officers that are

25 semi-specialist may only have one or two cases, amongst

1 the caseload of 30-odd other cases.

2 We had the benefit of, within our team, being aware

3 of all of the TACT cases within the Midlands. There was

4 another two CTPOs in the West Midlands and one CTPO

5 covering all of the East Midlands. So between us as

6 a team we were very experienced in understanding what

7 actions can and can't be taken, what actions are

8 proportionate and defensible in terms of risk management

9 so we were there to provide that support and guidance.

10 Q. So during a MAPPA meeting, if a decision came to be made

11 which involved risk management and which you thought

12 would benefit from your expertise and experience in

13 counter-terrorism specifically, you would chip in and

14 offer your view?

15 A. Yes, it was a constructive environment where everyone's

16 view was valued, so I felt comfortable making, kind of,

17 my views heard.

18 Q. We'll look at some specific minutes a little later, but

19 is it right that in general terms, the minutes discussed

20 or recorded the discussion of a wide range of subjects,

21 Khan's search for employment, his accommodation, his

22 involvement with educational providers like

23 Learning Together, and his attendance at events?

24 A. Yes.

25 Q. Is it right that minutes of those MAPPA meetings would

1 be circulated to participants afterwards and  
 2 participants could object if there was any misrecording  
 3 or omission?  
 4 A. That's correct.  
 5 Q. Is it also right, as we saw from the guidance this  
 6 morning --- we probably don't need to go back to it ---  
 7 that the procedures required significant or important  
 8 decision-making to be recorded in the minutes?  
 9 A. That's correct.  
 10 Q. In mid-May of 2019, as we've heard from Mr Bromley,  
 11 there was some consideration of changing Usman Khan's  
 12 OASys risk level from very high to high; do you remember  
 13 that?  
 14 A. I believe I remember a discussion where there was  
 15 disagreement around a decision being made around risk,  
 16 but I think I made the point in my statement that  
 17 I don't remember details beyond that.  
 18 Q. First of all, in what forum or on what occasions were  
 19 you involved in discussions about the changing of  
 20 Usman Khan's risk level?  
 21 A. So what we used to tend to find was that with me and  
 22 Kenneth, what would happen is prior to a MAPPA meeting  
 23 I would always kind of touch base with him and have  
 24 a general chat where possible, if we were crossing paths  
 25 or if I was in the Stoke office doing the other part of

1 my role dealing with other probation officers, so we  
 2 would always have a chat about anything that he was  
 3 potentially propose at MAPPA or any decisions he wanted  
 4 to raise at MAPPA for the panel to discuss and explore.  
 5 I don't specifically remember anything around that  
 6 risk and change to risk, that's not to say it didn't  
 7 happen, it's just a case that on a day that a MAPPA  
 8 would be held, our team would be listening to a range of  
 9 MAPPA cases for Terrorism Act offenders on a day, so in  
 10 a day we could be having seven or eight different MAPPA  
 11 discussions. I would be sitting on my cases, which  
 12 would be at least three or four on one day, so there was  
 13 multiple discussions.  
 14 So that recollection around a discussion around risk  
 15 I believe happened in relation to Mr Usman Khan and his  
 16 risk reduction but, again, it's very difficult to  
 17 remember now this many months on.  
 18 Q. Let's take this in stages, if we may. You had the MAPPA  
 19 meetings which you attended every five or six weeks or  
 20 so?  
 21 A. Correct.  
 22 Q. And you saw Mr Skelton, as you've told us, in advance of  
 23 those meetings, and spoke to him about the cases?  
 24 A. Where possible, yes.  
 25 Q. Where possible. Did you also speak to him in the period

1 between MAPPA meetings on other occasions?  
 2 A. If there was anything that he was struggling with, yes,  
 3 but out of all of the semi-specialists that I was  
 4 dealing with, Kenneth was very competent, he had good  
 5 working relationships with the police, all of the things  
 6 that we try to build between semi-specialists and the  
 7 agencies that we work with, so he was competent,  
 8 skilled, and pretty much got on with the job without the  
 9 need of any additional support.  
 10 Q. In your statement, you said that it would be normal for  
 11 you to speak to him perhaps once or twice between MAPPA  
 12 meetings?  
 13 A. That's correct.  
 14 Q. Would that be face-to-face discussions or over the  
 15 phone?  
 16 A. It could be both, but it most tended to be kind of  
 17 informal discussions as our paths crossed, just to check  
 18 in.  
 19 Q. Now, based on what you have told us, at some point you  
 20 became aware of discussions about Usman Khan's risk  
 21 rating being changed, or at least consideration of that.  
 22 A. I believe so, yes.  
 23 Q. Can you remember whether that was something you became  
 24 aware of in these discussions with Mr Skelton, or in the  
 25 context of the formal MAPPA meeting?

1 A. I can't recall.  
 2 Q. What you say in your witness statement is:  
 3 "I do remember in mid-May that there was  
 4 a discussion with Mr Skelton and his SPO, Mr Bromley,  
 5 about reducing the risk of serious harm from very high  
 6 to high."  
 7 And then you explain what those terms mean. And  
 8 then you say:  
 9 "This was discussed with the police, including those  
 10 within the West Midlands CT Unit. There was a belief  
 11 from Mr Skelton, Mr Bromley and PS Forsyth, who was part  
 12 of the Prevent Team..."  
 13 He was a Staffordshire officer?  
 14 A. Yes.  
 15 Q. "... that the risk should be reduced, but the WM CTU  
 16 police raised issues with this. I can remember the  
 17 difference of opinion but I'm not confident of the  
 18 specific details and can't remember anything more than  
 19 this."  
 20 You seem there to recall reasonably clearly  
 21 a difference between two groups of people: Mr Skelton,  
 22 Mr Bromley and Mr Forsyth on one hand, and some people  
 23 from West Midlands on the other hand. Are you now  
 24 saying that you have no recollection of such  
 25 a difference of opinion?

1 A. No, sir. I have recollection of that discussion  
 2 occurring in a MAPPA. What I can't recollect was  
 3 whether I discussed that risk reduction with  
 4 Mr Kenneth Skelton prior to that MAPPA meeting  
 5 happening. I specifically recall that split in  
 6 decisions, which wasn't uncommon in MAPPA meetings and  
 7 was, again, similar — not in terms of who was saying  
 8 what, but when we were talking about the employment,  
 9 which we may get onto later, and the dump truck, again,  
 10 there was always going to be a slight differing of  
 11 opinions, but overall, MAPPA always came to a consensus.  
 12 So on this occasion, there was a consensus reached. If  
 13 a consensus wasn't reached, it would have been so  
 14 significant that I would have remembered the details.  
 15 Q. So just to summarise this so we have it absolutely  
 16 clear, you are not sure whether and to what extent you  
 17 discussed this proposed change of risk level with  
 18 Mr Skelton before a MAPPA meeting, but you do remember  
 19 there was a MAPPA meeting in which this split occurred,  
 20 at least initially, between Mr Skelton, Mr Bromley and  
 21 Mr Forsyth on one hand saying the risk level should be  
 22 reduced, and people from West Midlands Police CTU  
 23 expressing the opposite view?  
 24 A. I believe so, yes.  
 25 Q. Can you recall anything about the reasoning given by the

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1 two sides of the divided opinion?  
 2 A. No. I can't — I can't recall the specifics of  
 3 obviously who specifically said what about that  
 4 decision.  
 5 Q. Are you able to recall how the discussion ended, what  
 6 consensus was reached?  
 7 A. Again, I can only go off the subsequent decisions, which  
 8 isn't my first-hand account of what happened.  
 9 Q. Is that reference to Mr Bromley confirming the  
 10 reduction?  
 11 A. Yes.  
 12 Q. May we now turn to mentoring arrangements. Usman Khan  
 13 was provided with mentors from a company called The  
 14 Unity Initiative under a contract with the Home Office,  
 15 is that right?  
 16 A. That's correct.  
 17 Q. And that was part of the DDP programme?  
 18 A. Yes.  
 19 Q. What, in broad terms, were the practical mentors who  
 20 assisted Usman Khan in sequence, what were they tasked  
 21 to do?  
 22 A. So the practical mentors didn't have any kind of risk  
 23 management responsibility; they were ultimately there to  
 24 provide that practical mentoring. The broad areas that  
 25 we tended to go through with them was a kind of

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1 prosocial activity, because we want this reintegration  
 2 into society, so prosocial activity is engagement within  
 3 society of any kind of group or activity that increases  
 4 Mr Khan's sense of belonging to society.  
 5 Then we have accommodation support, and employment  
 6 support, but ultimately with accommodation and  
 7 employment support we're also aware that we used  
 8 specialists for those, so people who have local  
 9 knowledge of accommodation and knowledge of obviously  
 10 what's available in line with Universal Credit, and  
 11 employment support, again, those that work in the area  
 12 of employment provision. So it's three broad areas that  
 13 we look at to assist Mr Khan.  
 14 Q. I think a tasking document was produced for the  
 15 practical mentors in this case. If we put on screen  
 16 {DC5639/1} that's a document from late 2018, which  
 17 identifies the probation counter-terrorism lead,  
 18 Lois Gell, yourself as CTPO, and Mr Skelton as probation  
 19 officer. Do we see that document sets out the offence,  
 20 and if we go down the page, the current situation with  
 21 Mr Khan?  
 22 A. Yes.  
 23 Q. Do we see that the current situation section refers to  
 24 bad behaviour in prison, but recent improvement and  
 25 positive reports both from the imam and from

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1 Learning Together?  
 2 A. That's correct.  
 3 Q. If we look at the very bottom of the page, do we see  
 4 this recorded:  
 5 "Since completing HII and TSP [that's the  
 6 Thinking Skills programme] Mr Khan has demonstrated  
 7 a level of insight into how this poor behaviour might  
 8 parallel some of the behaviours he was demonstrating at  
 9 the time of the index offence. However, assessments  
 10 within custody would indicate that his attitudes and  
 11 beliefs have not changed greatly since he was  
 12 imprisoned, and that the completion of HII has not had a  
 13 significant impact upon the risks he poses of  
 14 re-offending in this area."  
 15 Do you know who drew that document up?  
 16 A. I believe that was Lois Gell.  
 17 Q. Can you tell us who it went to?  
 18 A. So that document would go to The Unity Initiative, and  
 19 then the Joint Extremism Unit as well who oversee the  
 20 desistance and disengagement programme. I am not aware  
 21 of if it went to police colleagues, but my understanding  
 22 is at the time I would expect it to go to the offender  
 23 manager, but because the programme was so early on, and  
 24 there has been a number of changes in terms of who gets  
 25 what, I can't say for sure that Mr Kenneth Skelton got

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1 a copy of this.

2 Q. Did you get a copy?

3 A. I believe I did, yes.

4 Q. {DC5639/2}, please, at the top. Do you see the document

5 refers to "The most recent ERG assessment" which was the

6 one in the prison in April 2018. It says that suggests

7 that:

8 "... Mr Khan's current engagement with extremism is

9 medium but that this could increase on release, due to

10 potential need for status, having friends that share

11 extreme views and the need for identity and belonging."

12 And then there are high risk situations identified

13 including situations of prejudice or struggling to

14 establish a healthy identity in the community. So

15 that's drawing upon the most recent ERG assessment to

16 inform the mentoring process?

17 A. That's correct.

18 Q. Then if we go to {DC5639/4}, please, we see three areas

19 for intervention: employment and training; accommodation

20 and prosocial activities, like hobbies. Is it these

21 three areas for intervention which the practical mentors

22 were supposed to be helping with?

23 A. Yes.

24 Q. And in entirely practical terms, did the mentoring

25 process involve the practical mentor going to see

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1 Mr Khan at his approved premises once or twice a week?

2 A. That's correct.

3 Q. Speaking to him about matters of employment, training,

4 accommodation and hobbies and so on?

5 A. Yes.

6 Q. Helping him at the library with supervised internet use?

7 A. That's correct.

8 Q. And also spending some time with him, whether at a café

9 or a gym or wherever?

10 A. That's correct.

11 Q. Did you receive reports from the mentors once the

12 mentoring process had got going?

13 A. That's correct.

14 Q. And did you then pass them on to others?

15 A. Yes, so initially I believe Lois assisted in the sharing

16 of reports and then it was my role to ensure that

17 everyone that needed to have the reports received the

18 reports.

19 Q. Could you contact the mentors directly about anything in

20 the reports?

21 A. No, that was one of the problems with The Unity

22 Initiative.

23 Q. Did you have to go through somebody at The Unity

24 Initiative, I think called Mr Greenough, in order to

25 make any communications with the mentors?

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1 A. That's correct.

2 Q. You said that was one of the problems; how did it

3 manifest itself, this problem, what difficulties did it

4 create?

5 A. It creates — it reduces the accountability of the

6 mentor to a certain extent, because the mentor should be

7 acting in accordance with the tasking agreement that we

8 have set. Now, if there's any issues with the nature of

9 that session, what they've done and then the subsequent

10 reporting of that session, the role of Mr Greenough is

11 an additional layer that in our opinion and from our

12 experience now is not required. The mentor should have

13 contact with ourselves and we should be able to very

14 quickly identify any issues and alert them.

15 Q. In the reports that you received from the mentors over

16 the months when you were responsible for Usman Khan,

17 were the reports of the sessions generally positive,

18 speaking of Usman Khan being upbeat and polite and

19 engaged with the mentor?

20 A. Yes, so generally they were good and the point I'd like

21 to highlight here is that although the mentor was

22 assisting with these activities such as supervising

23 internet, a key part of the mentor's role was to really

24 pick up an understanding of what his attitude was in the

25 process.

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1 So as he oversees internet access, not only do we

2 want to know what he has visited and how it's going, but

3 we also want to know what his mood is, how he responds

4 to set-backs and positives, to really get a feel of how

5 genuine he was about seeking employment, et cetera, and

6 generally the feedback we got from the mentor was that

7 it was positive.

8 Q. But is it right that the reports did not engage in,

9 really, critical analysis of Usman Khan's mindset or

10 attitudes?

11 A. So the quality of the reports were not — in comparison

12 to the reports that we now get — would be considered to

13 be substandard.

14 Q. In what respects were they substandard?

15 A. In terms of the assessment quality. So not only being

16 descriptive in nature, but really providing a more —

17 better understanding of his assessment, of the mentor's

18 assessment. Now, that's not risk assessment, but just

19 their views in terms of how that progress is going and

20 what the attitudes are. So yes, they reported what was

21 happening in the mentor's view, but we could have had

22 a bit more detailed assessment.

23 Q. Do you recall, we can look at some examples if need be,

24 but do you recall that in some of the reports coming

25 back from the mentors there are signs of frustration,

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1 anger or rudeness from Usman Khan at times?  
 2 A. I recall that there was some issues. I don't know  
 3 whether that was primarily aimed at the mentor in terms  
 4 of their working relationship which again compared to  
 5 other working relationships that mentors have built with  
 6 Terrorism Act offenders wasn't the greatest. It wasn't  
 7 the worst either, but it wasn't the greatest.  
 8 Q. If we put on the screen some minutes from a MAPPA  
 9 meeting of 30 May 2019, {DC6413/6}, we'll see some  
 10 discussion of the mentoring sessions. If we look at the  
 11 last paragraph under section 9, so just above  
 12 section 10:  
 13 "Phil [I think that's Mr Bromley] advised that they  
 14 need to review HII and look at some developing dialogues  
 15 work as [Usman Khan] is not making much progress outside  
 16 of the AP [approved premises] he is not achieving a lot.  
 17 Not a lot can be taken from the mentor's reports, he  
 18 appears to just be accompanying [Usman Khan] to the gym  
 19 and supermarket. It is felt that the mentor could offer  
 20 a lot more in relation to assisting [Usman Khan] in  
 21 developing his level of social interaction. There is  
 22 also no mention of [Usman Khan's] unrealistic job  
 23 applications in the mentor's reports, however, [Usman  
 24 Khan] may not always be showing the mentor what roles he  
 25 has applied for. An action was given for the mentor's

1 work with [Usman Khan] to be reviewed."  
 2 So that entry suggests that in the MAPPA meeting  
 3 of May 2019 there were some concerns voiced about a lack  
 4 of value from the mentoring sessions; do you recall  
 5 that?  
 6 A. That's correct, and I think that's an accurate  
 7 reflection around the concerns we had.  
 8 Q. And based on what you've just said, you shared those  
 9 concerns?  
 10 A. Yes.  
 11 Q. What was done about those concerns?  
 12 A. So this is where the problem of having an additional  
 13 layer was, so instead of being able to pick up the phone  
 14 to the mentor like we can now, we would have to then  
 15 report those issues to Shaun Greenough, who would then  
 16 relay them to the mentor, the mentor and Shaun would  
 17 have a discussion, then Shaun would feed back to me how  
 18 that progress had gone, which was a slower process and  
 19 not always, in my view, as accurate or as efficient as  
 20 I would have preferred, and different to how we now  
 21 operate.  
 22 Q. On this occasion, how did the discussion with  
 23 Mr Greenough go?  
 24 A. I can't remember the specific details of that  
 25 discussion.

1 Q. As far as you can recall, were there any suggestions for  
 2 improvement? Did you come away from the discussions  
 3 with any hopes that things would get better?  
 4 A. Yes, so my discussions with Shaun would be around what  
 5 needs to change and what the concerns were and how we  
 6 would like improvements to go. So Shaun would obviously  
 7 reassure us that they would make those relevant changes  
 8 or address those problems, and we would come away from  
 9 the discussion hoping that that would then be reflected  
 10 in future reports.  
 11 Q. What were the changes you really wanted to see most?  
 12 A. For me, it was the descriptive nature of the reports.  
 13 Good mentoring for me, especially around that social  
 14 interaction, is — the Terrorism Act offenders have  
 15 a problem whereby they struggle because they shouldn't  
 16 be associating with old friends and associates because  
 17 if they continue to associate with those individuals we  
 18 see a repetition of that behaviour, so they need new  
 19 social circles and prosocial individuals that don't  
 20 despise society and everything that we stand for.  
 21 But that's difficult to build because no one wants  
 22 to be friends with a terrorist offender. No one wants  
 23 to be — they see Usman Khan, the protest at da'wah  
 24 stalls and everything that he stood for, and no one  
 25 wants to befriend that individual.

1 So mentoring should be about finding interests and  
 2 hobbies that they can engage in and actually meet  
 3 a variety of people from society and slowly and  
 4 naturally developing friendships in line with those  
 5 hobbies. It isn't and shouldn't be just about going to  
 6 the gym and then going for food.  
 7 Q. Now, the mentoring of Usman Khan ended at the end  
 8 of August 2019. What was the reason for that, as far as  
 9 you understood it?  
 10 A. So from my understanding, the contract for The Unity  
 11 Initiative wasn't renewed. I know there's reference to  
 12 it being terminated. I don't know the specifics, but  
 13 the message that we got was that the contract wasn't  
 14 renewed. I'm not sure whether it was a case of a new  
 15 contract wasn't offered or the new contract that was  
 16 offered wasn't accepted by The Unity Initiative, but it  
 17 was a relatively sudden set of circumstances.  
 18 Q. What was your view about the importance or otherwise of  
 19 getting Usman Khan a new mentor?  
 20 A. So with The Unity Initiative ceasing to provide  
 21 mentoring, there was a requirement for us to consider  
 22 all of the cases, because it wasn't just in Usman's  
 23 case, it was for a number of Terrorism Act offenders in  
 24 the community, some of whom were more recently released  
 25 and demonstrating significantly concerning behaviour as

1 well.

2 So my view was yes, we would like a mentor for

3 Usman Khan because it does more -- it is better than --

4 it doesn't do any additional harm; it's just

5 an additional layer, and it would assist with the social

6 isolation concerns that we were starting to see

7 manifest. But at the same time we were, especially in

8 our team, aware of the number of cases we had in the

9 community who had also lost their TUI mentors. So it

10 was a very difficult position to be in.

11 Q. Turning to Learning Together, did you become aware in

12 the early months of your time working on Usman Khan's

13 case that he'd become involved with the

14 Learning Together programme while in prison?

15 A. Yes, I did.

16 Q. What was your view of the effect of the -- of his

17 participation in the Learning Together programme on

18 Usman Khan?

19 A. So initially my interest was why he was involved in

20 terms of was there a celebration that he was a terrorist

21 offender that's now changed his life, and because from

22 my kind of academic understanding and background,

23 I didn't want him to then take on this identity of

24 ex-terrorist, like many people do, and then go on the

25 speaking circuit and academic writing books as

1 ex-terrorist.

2 For me I was reassured when I was made aware of

3 creative writing and that he was going down an avenue

4 where he was able to express himself in a more effective

5 way through his creative writing as opposed to his

6 involvement in da'wah stalls where he was able to

7 demonstrate concerning political and religious views

8 that were designed to shock and infuriate other members

9 of the public, so it was seen as a positive.

10 And then on top, it actually being Cambridge

11 University, my initial reaction was that is

12 a prestigious institution, and my reaction was not many

13 people from his ethnic and socioeconomic background are

14 fortunate enough to get into the universities like

15 Cambridge, so this would potentially do a lot of

16 positives for his sense of and belonging to our society.

17 Q. We know that in January 2019, Usman Khan was invited to

18 a Learning Together event in Cambridge, and that it was

19 decided, primarily by Mr Skelton and Mr Bromley, that he

20 shouldn't attend that event. Were you aware of that

21 decision being made at the time?

22 A. I believe I was, yes.

23 Q. Did you participate in that decision?

24 A. I don't think I had any specific verbal input but

25 I would have agreed at the time to that decision and the

1 decision made by Kenneth Skelton.

2 Q. What was the reasoning with which you would have agreed?

3 A. It would have required a variation -- not a variation,

4 but his licence conditions say such things as you have

5 to reside as directed, unless you have permission of

6 your responsible officer. It would have involved

7 Mr Kenneth Skelton providing permission on a licence

8 condition, which he would have been able to breach --

9 a breachable licence condition if he hadn't abided by

10 it, and that was too soon in his kind of release from

11 custody for us to be providing permissions on licence

12 conditions.

13 Q. Just to be clear, what's the risk of letting somebody go

14 to an event at Cambridge too soon?

15 A. Unrealistic expectations around reintegration into

16 society, and then also it was a case of he was -- in

17 terms of status, in custody he had built up a sense of

18 status and a sense of achievement. We also needed to

19 manage that because he was now coming out into society

20 as not only an ex-offender but as an ex-terrorist

21 offender with significant limitations on what he was

22 capable of doing and achieving. So we had to manage it

23 from both perspectives in terms of his own expectations

24 around what he can and can't achieve in society, but

25 also how we manage that licence from an enforcement

1 perspective.

2 Q. Wasn't there also another rather more practical risk,

3 that you would be sending somebody who still had that

4 very high risk rating attached to them to a prominent

5 event, which I think it was planned that the

6 vice-chancellor should attend, when you hadn't had much

7 chance to observe them?

8 A. To a certain extent, yes, that, again, going to any

9 event involves that licence condition that I was saying,

10 not to attend meetings without permission of your

11 responsible officer. So it wasn't -- that licence

12 condition is there for a reason, to manage that risk

13 that you've mentioned, and it was far too soon for us to

14 provide permission on that licence condition, because

15 that licence condition manages that risk, but at the

16 same time we also understood that there is freedom to

17 move around and travel within his existing conditions as

18 well. So it wasn't just a case that he is too dangerous

19 to go, but ultimately it's managing all of those

20 different aspects and elements which is, again,

21 a difficult task.

22 Q. But danger is an element to it, isn't it?

23 A. Pardon?

24 Q. Danger is an element to the decision-making?

25 A. It is, yes.

1 Q. The licence conditions aren't there just to give  
 2 somebody a comfort zone; they're also there to prevent  
 3 somebody engaging in extremist activity and  
 4 attack—planning or attack—perpetration?  
 5 A. That's correct, so any kind of permission on those  
 6 licence conditions does require him to continue to  
 7 demonstrate good behaviour.  
 8 Q. And a change of mindset?  
 9 A. And where possible where we can evidence that, yes,  
 10 that's also a key factor.  
 11 Q. We also know that Usman Khan was invited to and attended  
 12 a Learning Together event at Whitemoor Prison  
 13 in June 2019, accompanied by police officers, and that  
 14 that was approved by the MAPPa panel; were you aware of  
 15 that at the time?  
 16 A. Yes, I was.  
 17 Q. Do you recall discussion of that at the relevant MAPPa  
 18 meeting?  
 19 A. I do, yes.  
 20 Q. What do you recall of that discussion, what was said?  
 21 A. I recall discussing it in the context of not permitting  
 22 him to go to the earlier event, and then a discussion  
 23 around what the positives of it would be and how we were  
 24 going to manage his engagement with Learning Together in  
 25 the community, I believe.

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1 Q. Now, in your witness statement you say this about those  
 2 discussions:  
 3 "I felt that the event was manageable. It was  
 4 reassuring that there would be an escort, and was held  
 5 in the prison."  
 6 Is that how you looked at it?  
 7 A. Yes, because an escort in the sense that police officers  
 8 would be there to observe how he engages, so we have  
 9 another professional agency giving us feedback beyond  
 10 Learning Together. They would have had that time to  
 11 drive to Whitemoor Prison to have meaningful discussions  
 12 in a positive way, because here are police officers  
 13 driving him to something that he believes is bettering  
 14 his own situation, and with Whitemoor, it is  
 15 a controlled environment as well, so there's that  
 16 additional kind of reassurance of where the event  
 17 actually is, but primarily it was the police support  
 18 that was positive.  
 19 Q. You say specifically in your statement that one of the  
 20 things that reassured you was the fact that it was in  
 21 a prison, ie a secure environment; correct?  
 22 A. That's correct, yes.  
 23 Q. So, once again, part of your thinking was about managing  
 24 risk, not simply risk in terms of not getting good  
 25 feedback, but managing risk in terms of the risk of

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1 an offender engaging in some sort of terrorist activity?  
 2 A. That's true, yes, so in terms of — if we're looking at  
 3 how we're going to integrate and kind of sequence his  
 4 engagement with these activities, that was a step, and  
 5 a lot of the work that we do is around progressing  
 6 individuals and slowly easing them in. So the first  
 7 event, not appropriate; second event, controlled  
 8 environment, police presence to oversee that and the  
 9 risk can be managed in that decision.  
 10 Q. Can we now turn to the ERG process, the Extremism Risk  
 11 Guidance process of late 2019. As we've heard, it was  
 12 decided that an ERG process would take place in the  
 13 latter half of 2019?  
 14 A. That's correct.  
 15 Q. Did Mr Skelton take the lead on that process with your  
 16 assistance?  
 17 A. Yes.  
 18 Q. Is it right that the process involved you and Mr Skelton  
 19 engaging in interviews of Usman Khan?  
 20 A. That's correct.  
 21 Q. Over what period did those interviews take place?  
 22 A. I believe it was a... I can't recall the specific month  
 23 that it occurred, but the interviews were completed in  
 24 succession of one another within a timely manner in  
 25 terms of between sessions, so we didn't leave too long

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1 of a delay between sessions.  
 2 Q. How many interviews were there?  
 3 A. I believe there were two.  
 4 Q. How long were they each?  
 5 A. They were lengthy in nature, hence why we have to split  
 6 them up over two, so from my recollection, at least  
 7 an hour.  
 8 Q. Were they at the approved premises?  
 9 A. Yes, they were.  
 10 Q. In general terms, how did Usman Khan present in those  
 11 interviews?  
 12 A. He presented as motivated to engage, he presented as  
 13 someone that wanted to share what he believed to be his  
 14 newly learnt views and his progress.  
 15 Q. May we look at some of the MAPPa minutes in relation to  
 16 the ERG process. First, {DC6415/6}, and at the bottom  
 17 of the page, please. These are the MAPPa minutes from  
 18 22 August 2019 meeting. We see you are recorded as  
 19 confirming that:  
 20 "... during the ERG interviews Usman Khan  
 21 demonstrated that he had moved away from his previous  
 22 ideology. He wants to find accommodation and a job —  
 23 he just doesn't know how to achieve this."  
 24 And then there is reference to the fact that  
 25 Usman Khan can present as child—like and stubborn, but

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1 you say that this behaviour has never transferred into  
 2 anger towards yourself or Mr Skelton?  
 3 A. That's correct.  
 4 Q. So is it right that based on the interviews, you  
 5 considered that Usman Khan had moved away from his  
 6 previous extremist ideology?  
 7 A. So from the range of explorative questions I was raising  
 8 with him, trying to explore what his current views were,  
 9 he was verbally demonstrating that he had not only  
 10 distanced himself from those views, but as part of his  
 11 account, he was really latching onto this sense of  
 12 understanding that he was foolish and that he had learnt  
 13 more. So not only was it compliance, there was a degree  
 14 of impression management going on, and a sense that his  
 15 kind of personal agency of who he was was increasing, so  
 16 he was keen to demonstrate that he had moved away from  
 17 those views, yes.  
 18 Q. So are you telling us that you thought he was keen to  
 19 demonstrate that he had moved away from previous  
 20 ideology, or that he had moved away from it?  
 21 A. So it was — he was keen to demonstrate that he had  
 22 moved away from that ideology, and from my explorative  
 23 questions with him, there was nothing I could pick up on  
 24 there that was inconsistent. That's not to say that  
 25 I believed that he had moved definitely away from the

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1 ideology, because one ERG or two ERG interviews are not  
 2 enough to confidently say that, but in terms of how he  
 3 expressed his political views, his views around  
 4 religion, and his views towards society, he was keen to  
 5 demonstrate a distinct difference between then and now.  
 6 Q. May we go to the MAPPAs minutes for 3 October 2019,  
 7 {DC6416/5} towards the top of the page. These, as  
 8 I say, are the minutes from 3 October 2019. Now, if we  
 9 look at the paragraph beginning "Jo enquired", then at  
 10 the bottom of the paragraph you are recorded as adding  
 11 that:  
 12 "... [Usman Khan]'s mindset is that he is moving  
 13 away from his extreme views, but after completing ERG  
 14 has got views on why he thinks people become  
 15 terrorists."  
 16 Again, were you saying that he had in fact moved  
 17 away from extreme views or that he was keen to present  
 18 himself as such?  
 19 A. So what I was meaning by that is he was keen to present  
 20 that he had, but it was a sense of self belief that now  
 21 he had engaged in academia, not only had he bettered  
 22 himself in terms of his own independent critical  
 23 thinking, but he felt like he had something to share  
 24 around his understanding as to why people engage in  
 25 terrorism.

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1 Now, I pointed out at the start of my testimony  
 2 around my concerns about him taking on this ex-offender  
 3 identity, and it's something that I personally would  
 4 never be keen — or professionally would never be keen  
 5 on anyone adopting, and it wasn't something that was  
 6 a positive in that sense, so I was highlighting there  
 7 that he now thinks he knows why people are radicalised  
 8 from his own experiences. In that he obviously thinks  
 9 he is now better than those that get radicalised, but  
 10 ultimately that isn't a positive or a negative, but yes,  
 11 he is demonstrating, or he is trying to demonstrate that  
 12 he has moved away from those extreme views and is  
 13 better.  
 14 Q. We can take that off screen now.  
 15 Is it right that a draft report at the end of this  
 16 ERG process was produced by Mr Skelton in November 2019?  
 17 A. That's correct.  
 18 Q. And we can go to the Delius record if necessary, but was  
 19 it discussed with you on 27 November 2019, a couple of  
 20 days before the attack?  
 21 A. Yes, I recall being in the Stoke office and reading  
 22 through that report. Ken was in the office as well.  
 23 Q. Having read through it, what was your view of it?  
 24 A. I think it was balanced. There was obviously — it  
 25 wasn't the final, final version because I believe there

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1 were some sections that needed additional work, however,  
 2 I primarily focused on the scoring and provided my  
 3 feedback to Ken. There's been a number of ERGs that  
 4 I've read and completed in that time, so it's difficult  
 5 to remember — recall specifics unless we go through it  
 6 line-by-line, but overall I felt like Ken had captured  
 7 the scoring very well and there were other sections that  
 8 were going to be changed going forwards as well.  
 9 Q. May we go to the draft report. It's {DC5323/3} if we  
 10 can go first to page 3, at the bottom of page 3,  
 11 paragraph 3.1 under the first engagement factor "Need to  
 12 redress injustice", an explanation by Usman Khan of his  
 13 offending is recorded, and it says:  
 14 "During interview Mr Khan discussed how he felt that  
 15 the police raids upon his own property was just part of  
 16 wider injustice in the world against Muslims. He also  
 17 suggested that the increasing impact of the English  
 18 Defence League... and their alleged involvement in the  
 19 murder of his friend was also an influencing factor  
 20 fuelling his anger."  
 21 Then there's reference to the da'wah stall, and over  
 22 the page, please {DC5323/4}:  
 23 "... he now having reflected upon his actions  
 24 recognises that this behaviour was more about himself  
 25 and how he felt personal injustice in that his own

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1 property had been raided by the authorities."  
 2 First of all, was it part of your function at all to  
 3 verify the facts, for example, to look into whether his  
 4 friend had in fact been killed in a racist murder?  
 5 A. So in response to your question, there's two areas to  
 6 this, the need to redress injustice, so this is the  
 7 correct section for that information to go into, and  
 8 when we look at redressing injustice, it's subjective,  
 9 and the individuals that we work with, the extremists,  
 10 they all have their own sense of reality and their own  
 11 perceived grievances. For us it's not to break down  
 12 specifically -- not in an ERG at least anyway, to break  
 13 down those perceived grievances. If you perceive to be  
 14 a victim of racism as he did, many of us would say he  
 15 had potentially a chip on his shoulder, but ultimately  
 16 if he perceives that he's a victim of racism, we have to  
 17 work with that and understand how does this grievance  
 18 function in terms of his engagement with the extremist  
 19 ideology.  
 20 So to a large extent, when we deal with ERGs we're  
 21 not verifying is there this injustice or not. What  
 22 we're looking at is how does this person perceive there  
 23 to be an injustice and how does that interact with this  
 24 ideology and what need does it fulfil.  
 25 So in terms of verifying information, if he said he

1 was part of a criminal act or a victim of a specific  
 2 criminal act, we would verify that. If it was something  
 3 that he perceives, we only take that on his actual  
 4 account, and this ERG is for professionals that work in  
 5 risk assessment, and all the professionals that get --  
 6 shared a copy of this will understand what is verifiable  
 7 and isn't verifiable.  
 8 So in answer to your question, sometimes we need to  
 9 verify certain things, other times we're talking about  
 10 perceived injustice and the perceived grievances and the  
 11 function it plays, so not always.  
 12 Q. If we look then at paragraph 3.3, there's "Identity,  
 13 meaning and belonging", that factor. We see that the  
 14 report again describes suggestions of racism experienced  
 15 in early years, and then he says his desire to construct  
 16 a mosque in Pakistan was as a result to find meaning and  
 17 purpose in life.  
 18 And then down the page, please, to paragraph 3.4,  
 19 under "Excitement/Comradeship and Adventure":  
 20 "His desire to construct a camp/mosque within  
 21 Pakistan was not Mr Khan says motivated by his need for  
 22 excitement. He claims that it was driven by his anger  
 23 aimed at the UK and the authorities for raiding his  
 24 property."  
 25 Then over the page, please, to {DC5323/5}. He

1 refers to the place -- the fact that weapons were  
 2 present at the camp being more about self-defence.  
 3 A. Yes.  
 4 Q. When you read that, did you not think: this is nonsense.  
 5 This man wasn't setting up a mosque. He didn't have  
 6 weapons there for self-defence. He'd admitted before  
 7 a criminal court that he was setting up an armed camp to  
 8 train terrorists. Didn't it occur to you that this was  
 9 nonsense?  
 10 A. We were fully aware of the facts of the investigation,  
 11 the basis of plea, and the findings of the court.  
 12 Ultimately this ERG is to be read in conjunction with  
 13 other ERGs and other material. So what we're looking at  
 14 here is his account of what he was doing. Particularly  
 15 given the fact that he hadn't engaged in previous ERGs,  
 16 the fact that we're reporting it here is to demonstrate  
 17 and identify potential inconsistencies and a lot of this  
 18 is his impression management that he's doing in relation  
 19 to professionals.  
 20 So yes, we know that's not consistent with what he  
 21 said. We're giving his account of why he thinks he  
 22 engaged in this offending.  
 23 Q. Didn't it also occur to you that, quite apart from it  
 24 being inconsistent with his own basis of plea, that it's  
 25 a rather implausible account to say, in effect: I became

1 cross with the police for searching my flat so I decided  
 2 to set up an armed terrorist training camp? Wouldn't  
 3 that strike most of us as a rather implausible account?  
 4 A. So in relation to that, ultimately what we're looking at  
 5 is it wasn't A causes B, it's his understanding and his  
 6 drivers for why he engaged in offending. We looked  
 7 beyond that, and again, this is why professionals that  
 8 work in our field that have access to this document,  
 9 it's an understanding of what feelings and what  
 10 grievances did that elicit with the police raid and how  
 11 did he then address those feelings and grievances and  
 12 what did this extremist ideology provide him in terms of  
 13 addressing that, and making him now feel like he now had  
 14 power or he could get back at authorities or the state  
 15 that he felt he didn't belong to.  
 16 Q. Isn't it any part of the ERG process when you are going  
 17 through these different factors to do a self check and  
 18 ask whether you're just being lied to?  
 19 A. Ultimately we are aware of inconsistencies in accounts.  
 20 What he's saying, no one that reads these documents  
 21 amongst us professionals take it at face value unless  
 22 it's verified or it's a fact that we can check. So what  
 23 we're dealing with here is his views, and we're fully  
 24 aware that they are his views and what he's dealing  
 25 with. We're looking at that engagement with extremist

1 ideology in his perception. So is it completely  
 2 accurate? No, it's not. Are we aware of that? Yes, we  
 3 are.  
 4 Q. But did you then draw upon these inconsistencies in the  
 5 interviews and warn your colleagues in the MAPPA  
 6 meetings that Usman Khan was being inconsistent,  
 7 implausible, very possibly lying to you?  
 8 A. So in terms of where we were there was an understanding,  
 9 so is he lying specifically? No, he's adjusting the  
 10 details to reflect a better self-image, and that was  
 11 reflected in terms of how he sees himself now, and where  
 12 he's going. So my feedback to MAPPA would have been  
 13 more detailed in the final ERG when feeding back. When  
 14 I fed back to MAPPA I wanted to give an indication of  
 15 where we were going with the scoring, because it was  
 16 important, given the delays, that if there were any  
 17 significant changes in any sections in terms of a factor  
 18 that was not previously present that was now present, or  
 19 a factor that was previously partly present that was now  
 20 strongly present, that that was reflected to input into  
 21 the MAPPA decision-making.  
 22 So the scoring that Ken had made was primarily what  
 23 we were looking at and trying to identify if there was  
 24 anything immediate. Now the final draft -- the final  
 25 version of the ERG would have been shared prior to

1 a MAPPA. That would have been discussed in detail at  
 2 MAPPA.  
 3 Q. But you had seen the MAPPA F forms which had raised the  
 4 specific risk that Khan was being deceptively compliant,  
 5 that he was lying to con the authorities. You were  
 6 seeing evidence in your discussions with him about  
 7 serious inconsistencies and implausible accounts. Did  
 8 you not see it as part of your responsibility to go to  
 9 your MAPPA colleagues and say: there is some more  
 10 evidence here of deception?  
 11 A. So the intelligence and information we're getting from  
 12 the prison concerns what is motivating his level of  
 13 compliance, and there were concerns that that compliance  
 14 was superficial and that he was obviously engaging and  
 15 complying to get beneficial -- the benefits of looking  
 16 like he's complying.  
 17 What we have in this ERG is inaccurate views of the  
 18 index offence and his own perceptions of why he's  
 19 engaged. He is speaking openly and frankly. There's no  
 20 paralleling behaviour to his problematic behaviour  
 21 whilst in custody in which he was disruptive and not  
 22 engaging with authorities and causing numerous forms of  
 23 intelligence reporting in relation to extremist  
 24 behaviour and influencing others. We didn't have those  
 25 parallels, so in terms of what I needed to raise to

1 MAPPA in relation to the ERG, the ERG scoring in those  
 2 sections was consistent with the direction of his  
 3 progress.  
 4 Q. Can we have {DC5323/9}, please, paragraph 4.4 towards  
 5 the top of the page:  
 6 "During interview Mr Khan stated that he used to  
 7 reference key ideologues..."  
 8 And there's reference to ideological preachers:  
 9 "... without having read it himself but having  
 10 a basic knowledge. His engagement with the imam and  
 11 having read various text he is now able to articulate  
 12 how religious texts can be taken out of context and  
 13 manipulated by those who wish to achieve a harmful aim.  
 14 He demonstrates a belief that some religious based  
 15 interpretations lack any real basis. The ERG dated  
 16 [I think that's the April 2018 ERG but Khan's date of  
 17 birth is inserted there by mistake] suggested that  
 18 Mr Khan was involved in negative behaviour on the wing,  
 19 that included the demonstration of extremist attitudes,  
 20 attempts to radicalise others and having the potential  
 21 to cause harmful disruption. Up to his release there  
 22 was no further negative reports regarding Mr Khan's  
 23 behaviour and I myself have recognised a positive change  
 24 in manner towards authorities and the supervision  
 25 process. Since his release ... Mr Khan has complied

1 fully whilst in the approved premises and also following  
 2 move on. There has been no demonstration of attitudes  
 3 supporting or justifying offending of any nature."  
 4 So the report references the previous detailed ERG  
 5 assessment, which acknowledged that Khan demonstrated  
 6 extremist views, but it goes on to suggest, in effect,  
 7 that he has abandoned those extremist views because he  
 8 has been compliant, doesn't it?  
 9 A. That's not my reading of that.  
 10 Q. Well, what's your reading of it?  
 11 A. So my reading of that is initially we've got  
 12 a discussion around his own religious knowledge, we have  
 13 a key difference, and apologies if this gets slightly  
 14 technical, I'm going to try to keep it as basic as  
 15 possible. Those that are theologically driven believe  
 16 to their core that the texts within the Koran and the  
 17 Hadiths is evidence and supportive of offending  
 18 behaviour. So all those actions around the  
 19 implementation of Shari'a is written theologically in  
 20 the text and it is the only way of functioning. So they  
 21 are vehemently theologically driven. They believe in  
 22 the theology and the arguments around the interpretation  
 23 of the Koran and that's what drives them.  
 24 Other individuals are driven more so by political  
 25 factors, that's what we saw with Usman Khan, that's what

1 we saw with the da'wah stalls and that's what we saw  
 2 with the drivers where it is primarily this thinking of  
 3 us and them, the fact that British armed forces are in  
 4 the Middle East and those political factors around  
 5 foreign affairs and this deluded view that every soldier  
 6 is in the Middle East raping and killing innocent  
 7 children, those factors driver individuals. When you  
 8 start to unpick Mr Usman Khan's views, it was very clear  
 9 that it was the latter, political issues that drive him,  
 10 as opposed to a core belief that the text of the  
 11 Koran -- there is only one core reading of that text and  
 12 that is the only way in which one should live.

13 They overlap because in the latter part of the us  
 14 and them thinking, part of that is encouraging others to  
 15 convert to Islam and encouraging people to join your in  
 16 group and your us, hence why you see that behaviour in  
 17 custody, and we see that reflected around that, but then  
 18 in that reading what we also see is that the approved  
 19 premises where he's surrounded by other offenders in  
 20 an environment that isn't as controlled as the prison  
 21 but reflects the prison slightly, there wasn't the same  
 22 concerns being raised.

23 Now, that raises some questions as to why that is,  
 24 and we obviously know that the consequences would be  
 25 significantly different, but we didn't see any

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1 demonstration of that us and them thinking whilst in the  
 2 approved premises, whilst there was probation staff  
 3 always on-site engaging in key work sessions, having  
 4 a degree of monitoring over his behaviour when he's not  
 5 in front of staff, via CCTV, et cetera, and feedback  
 6 from other residents, other offenders that are living in  
 7 the approved premises.

8 So it's not as simple as saying that he behaved in  
 9 an extremist way in custody and then now he's not  
 10 demonstrating anything else. It's complicated and it's  
 11 very difficult to explain.

12 Q. Let me take that in stages. First of all, you say that  
 13 it was your view that Usman Khan's motivation for  
 14 offending was politically, not theologically, driven?

15 A. At its core, yes, but there was an overlap of  
 16 interpretation of religion that did justify those  
 17 political values.

18 Q. Pause there. Usman Khan associated with Anjem Choudary  
 19 and took the stand at events with him. Usman Khan had  
 20 multiple extremist texts at various points during his  
 21 life. Usman Khan preached from stalls which advocated  
 22 Shari'a law in the UK. Was there anything beyond what  
 23 Usman Khan claimed his motivations were to tell that you  
 24 his motivations were political rather than theological?

25 A. Yes, so based on all of that, the exploration of

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1 actually core religious principles, and then  
 2 understanding that yes, he was besides the likes of  
 3 Anjem Choudary, but ultimately everyone that is involved  
 4 with these organisations have different drivers, and at  
 5 the core of it, it was politically driven.

6 Q. Why? Why did you accept his assertion it was  
 7 politically driven?

8 A. It wasn't his account that it was politically driven,  
 9 that was my assessment, my view, from explorative  
 10 questions around religion, around kind of the nature of  
 11 the index offence, around his views previously, at the  
 12 time, and on the information available. The fact that  
 13 he lacked any real theological understanding in any way,  
 14 so some people say that there's a core belief in terms  
 15 of how the world should be, and that core belief is  
 16 underpinned by their interpretation of religious  
 17 scriptures.

18 His interpretation and understanding of religious  
 19 scriptures was quite shallow and hollow. That was a  
 20 lack of any real depth this actual Islamic knowledge.  
 21 He wasn't interested in my view in that depth of  
 22 religious knowledge. He wasn't a student, studying, and  
 23 in terms of actual really deep diving into religious  
 24 texts and then interpreting the scriptures, it was  
 25 superficial understandings around the interpretation of

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1 the Koran that overlapped with politics.

2 Q. But haven't we seen time and time again in the criminal  
 3 courts and in the coroners' courts, people with a very  
 4 superficial understanding of Islam taking out knives and  
 5 using vehicles as weapons and killing people in the name  
 6 of Islam and in a search for martyrdom?

7 A. Yes, and I would agree with you that that is religiously  
 8 motivated. I think what is happening here is that we,  
 9 when we do our assessments, are looking at key,  
 10 underlying drivers. How they manifest themselves is  
 11 exactly how you describe, so by us saying it's  
 12 politically motivated isn't trying to take the religion  
 13 out of it, it is us looking at this extremism and the  
 14 engagement with extremism and understanding what part of  
 15 it resonates with the individual. How it manifests  
 16 itself is always in brutal violence in the name of  
 17 religion, we know that, we're not denying that, it's the  
 18 core drivers that we're looking at.

19 Q. May we finally on this document, before the break, look  
 20 at the section on risk assessment, {DC5323/12}, please,  
 21 at the top. Mr Skelton first of all assesses  
 22 Usman Khan's level of engagement with extremism as  
 23 medium. No current evidence of engagement with  
 24 an extremist cause. Then in relation to intent, he  
 25 assesses Usman Khan as having a low intent, no current

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1 evidence of intent to cause harm, and about capability,  
 2 he assesses Usman Khan's capability for harm as minimal.  
 3 Then at the bottom of the page, please, and over the  
 4 page {DC5323/12}, if we go right to the bottom, the  
 5 conclusion is that:  
 6 "... Usman Khan's likelihood of re-offending and  
 7 risk of extremist offending is low."  
 8 Obviously the timing is unfortunate, this document  
 9 is produced expressing these views very shortly before  
 10 Usman Khan perpetrated a terrible terrorist outrage.  
 11 Looking back, do you consider that in these  
 12 interviews, Usman Khan successfully deceived you and  
 13 Mr Skelton, or that something in him changed between the  
 14 interviews and the attack?  
 15 A. It's a difficult question to answer. Ultimately, upon  
 16 reflection, for me, in my professional judgment is that  
 17 Mr Khan was an individual that always struggled to  
 18 belong, struggled to fit in and didn't know where he  
 19 fit. Whether that is actually accurate and his own --  
 20 in the objective understanding, but that's obviously how  
 21 he felt in terms of how he engaged.  
 22 Was the entire interview deceitful and did he  
 23 consistently present himself as someone that had  
 24 changed? He always did impression management. Everyone  
 25 that we deal with manages how they present themselves to

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1 authorities. Everyone that complies is motivated to  
 2 comply for one reason or another, but in terms of the  
 3 evidence in front of us and available to us at the time  
 4 of that assessment being completed, that assessment and  
 5 those scorings are based on only the evidence that we  
 6 had in front of us and available to us, and that ERG was  
 7 completed in line with the guidance that's required for  
 8 that assessment to be completed.  
 9 So I'm not able to provide you an answer as to which  
 10 of the two it was: all I can say is that we had evidence  
 11 available to us, not just what he said, but in terms of  
 12 his behaviour and where he was going in terms of the  
 13 building of protective factors and social isolation, and  
 14 based on those, that's what the score was. I can't  
 15 answer whether he deceived us.  
 16 Q. And what would you say if it was suggested that too much  
 17 of that evidence came from one source: Usman Khan?  
 18 A. There's what Usman Khan says to us, there's what  
 19 Usman Khan -- and how he behaves in front of agencies,  
 20 and then there's also how he behaves around others.  
 21 So if he is a source of information, it's in  
 22 multiple ways, not just in what he says to us.  
 23 MR HOUGH: Thank you very much.  
 24 Sir, would that be a convenient moment for our  
 25 mid-afternoon break?

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1 JUDGE LUCRAFT: It would. We will take a break there. We're  
 2 going to take our 15-minute comfort break and we'll sit  
 3 again then.  
 4 A. Thank you.  
 5 (In the absence of the jury)  
 6 MR HOUGH: Sir, I can say that I'm very nearly finished,  
 7 only five minutes or so, but we may ask -- just check  
 8 time estimates with some of the other advocates just to  
 9 see if we can finish Mr Johal today.  
 10 JUDGE LUCRAFT: Thank you very much. I'll rise.  
 11 (3.29 pm)  
 12 (A short break)  
 13 (3.46 pm)  
 14 (In the presence of the jury)  
 15 MR HOUGH: Sir, based on time estimates, we're confident we  
 16 will finish Mr Johal today.  
 17 JUDGE LUCRAFT: Very good.  
 18 MR HOUGH: Mr Johal, now moving on to the Learning Together  
 19 event at Fishmongers' Hall, we have heard that  
 20 Usman Khan was invited to that event in August 2019, the  
 21 event to take place at the end of November 2019. When  
 22 did you first become aware of that invitation?  
 23 A. I believe it was a few months before the event itself.  
 24 I can't recollect specifically when. It would have been  
 25 either prior to a MAPPA meeting or during the MAPPA

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1 meeting.  
 2 Q. Well, in fairness to you, I'm going to show you the  
 3 minutes of each of the MAPPA meetings that followed.  
 4 First of all, {DC6415/4}. These are minutes of the  
 5 MAPPA meeting on 22 August, so if we can go to the  
 6 bottom of the page we can see this written:  
 7 "[Usman Khan] continues to have contact with  
 8 Cambridge University on an almost weekly based. He has  
 9 applied for a bursary to support his attendance on  
 10 a short course beginning next April. The course will  
 11 last 1-day and will entail an overnight stay. The  
 12 university are also hosting another 1-day event  
 13 in November -- [Usman Khan] will be invited however will  
 14 have likely moved on from the AP by this point and will  
 15 need to source his own means of travel."  
 16 Then it goes on to accommodation. So that was  
 17 a meeting which you attended and at which the event was  
 18 raised?  
 19 A. Yes.  
 20 Q. Then {DC6416/4}, please, bottom of the page.  
 21 These are minutes from 3 October 2019, the next  
 22 meeting when you were again present, and we see  
 23 reference to Usman Khan engaging with Cambridge  
 24 University, has registered for a two-day course:  
 25 "He has also been invited to go to London

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1 in April 2020 — the event is ... for one day but  
 2 requires him to be there the day before so does involve  
 3 an overnight stay.”  
 4 So there doesn't seem to be specific discussion of  
 5 the London visit in November 2019 in the course of that  
 6 meeting based on the minutes.  
 7 Then {DC6417/5}, these are, again, if we go to the  
 8 bottom of the page, minutes from 14 November 2019, the  
 9 last of the MAPPA meetings concerning Khan. We can see  
 10 in the penultimate paragraph:  
 11 “[Usman Khan] is scheduled to attend an event in  
 12 London on 29 November 2019 through Cambridge University.  
 13 He will be travelling via train from Staffordshire to  
 14 Euston, at which point he will be met by colleagues from  
 15 Cambridge whom will then take him in a taxi to the event  
 16 location. He will then be transported back to Euston  
 17 station via taxi, and from here he will catch the train  
 18 back to Staffordshire. Calum Forsyth noted that the  
 19 logistics for the trip need to be discussed and  
 20 confirmed.”  
 21 Then there is discussion about recent contact with  
 22 Cambridge University. So those are the MAPPA minutes  
 23 which suggest a brief discussion in August, no  
 24 discussion in October, and then a discussion of  
 25 logistics in November; do you see that?

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1 A. Yes.  
 2 Q. What is your own recollection of discussions during  
 3 these MAPPA meetings about the visit to London?  
 4 A. So I can't remember specific discussions, so I would  
 5 have to go by what the MAPPA minutes identify. The last  
 6 comment there, where Calum Forsyth talks about  
 7 logistics, I remember that that comment with  
 8 Nigel Byford confirming that the logistics of the trip  
 9 will be sorted out between Ken and Calum outside of  
 10 the meeting.  
 11 Q. Now, a striking feature of these sets of minutes seen  
 12 together is that there is no reference to any discussion  
 13 about the risks of Usman Khan being permitted to go to  
 14 London. As far as you can recall, was there any such  
 15 discussion in any of the MAPPA meetings of the risks of  
 16 Usman Khan being permitted to go to London, either to  
 17 confirm those risks, to say that they weren't  
 18 particularly high, or whatever?  
 19 A. So I don't recall any specific discussions around that  
 20 specific trip to London and the risks around that. From  
 21 my understanding, and my recollection is very much when  
 22 discussing Learning Together in general, we always  
 23 discussed — or when discussing the events that he was  
 24 not allowed to go to and how the sequencing would look  
 25 earlier, there was an understanding that there was no

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1 evidence of an increased risk at the Learning Together  
 2 events.  
 3 It was discussed prior to that that there was no  
 4 objections. Now if any agency had a specific problem  
 5 with the trip to London and the location of London,  
 6 I would expect an agency to have raised that. So  
 7 I again have to go off what's in the MAPPA minutes, and  
 8 I can't recall anything additional. That's not to say  
 9 it hasn't occurred, I just can't recall any  
 10 conversations.  
 11 Q. So you don't have any independent recollection of the  
 12 London visit having been discussed from a risk  
 13 perspective?  
 14 A. Not beyond the discussing the logistics of the comment  
 15 made around logistics being sorted out outside of the  
 16 meeting.  
 17 Q. A related and also striking feature is that there is no  
 18 reference in any of these minutes to a possible  
 19 accompaniment for Usman Khan or any other measures to  
 20 reduce risk. So, for example, some surveillance on him  
 21 at any stage, or having him met at any stage. As far as  
 22 you can recall, was there any discussion of that sort of  
 23 measure in any of these meetings?  
 24 A. So there was no discussion around specific tactics that  
 25 the police would be deploying around that visit. My

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1 understanding is when we're talking about logistics,  
 2 from my experience and having worked in the police  
 3 previously, my expectation, personal and professional  
 4 level, would be that police in London are notified of  
 5 that trip, and I would expect that between Staffordshire  
 6 and West Midlands Police colleagues that would be  
 7 arranged amongst themselves, as is normal police  
 8 practice for anyone.  
 9 In terms of the specific risk of going to London and  
 10 the accompaniment, the support that the police provided  
 11 him at the previous event, then the — it was managed in  
 12 the sense that if he goes to the next event, we've got  
 13 an overnight residency event coming up, so we have to  
 14 manage that from that perspective. The actual issue  
 15 with going to London itself is complex and quite  
 16 difficult to comprehend because ultimately we can't —  
 17 our licence conditions don't restrict him from going to  
 18 any big city whatsoever. If we felt that he is an  
 19 imminent risk or if we had any evidence or information  
 20 to suggest that he was engaged in any attack—planning or  
 21 event in relation to what occurred, he wouldn't have not  
 22 only been permitted to go but we would have been looking  
 23 at recalling him at the very least for not being of good  
 24 behaviour if we had the slightest evidence or  
 25 information, that's where we were with him, so it's not

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1 a case of we weren't conscious of risk , we are always  
 2 conscious of risk , we are always conscious of public  
 3 protection , and that supersedes his rehabilitation .  
 4 Q. Usman Khan remained somebody who , on any view ,  
 5 represented a significant risk of harm to the general  
 6 public at this point in time , didn't he?  
 7 A. That's correct .  
 8 Q. That's the assessment that was being made by all the  
 9 professionals ?  
 10 A. That's correct .  
 11 Q. With an extremist offender and that risk profile , surely  
 12 there was a risk of him going to an event in central  
 13 London , in an iconic location , attended by lots of  
 14 dignitaries ?  
 15 A. I would agree with that , yes , there is a risk , and you  
 16 can't reduce that risk to zero ever . Similarly though ,  
 17 he had the capacity and the capability to also visit  
 18 shopping centres , to visit places of significant public  
 19 population in a condensed area as well . We work in  
 20 a very difficult environment where these individuals  
 21 that present risk have the capacity to be in a multitude  
 22 of significant and prolific places .  
 23 Q. Would you accept , as somebody who has studied these  
 24 matters , that for a terrorist , an attack in central  
 25 London and the Fishmongers' Hall is more attractive than

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1 an attack on the streets of Stoke-on-Trent , as a general  
 2 proposition?  
 3 A. Symbolism of an offence is very important for  
 4 individuals , but we're not in the business of displacing  
 5 an attack or delaying attack , our focus is protecting  
 6 the public , and if we had any evidence of an attack in  
 7 any location , we would be looking to recall because we  
 8 could not manage that individual's risk in the  
 9 community , which is a threshold that we use when we're  
 10 looking at potentially recalling someone back to  
 11 custody .  
 12 Q. You've accepted a high risk individual , a location  
 13 attractive for terrorists . You've accepted that the  
 14 risk can't be reduced to zero , and that your focus  
 15 should be on protecting the public . Against that  
 16 background , are you able to explain why in none of these  
 17 MAPPAs meetings there was apparently any discussion of  
 18 risk ?  
 19 A. The whole focus of that MAPPAs meeting is underpinned by  
 20 his risk to the public , to a risk to staff , risk to  
 21 known individuals , and the general public . All  
 22 discussions are underpinned by risk , and if there is  
 23 evidence of imminent risk , if there is change to risk  
 24 factors , it is flagged up at MAPPAs , we would be talking  
 25 in the context of his position within the community in

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1 general , as well as his attendance at a specific event ,  
 2 like you said , that was prolific and was in a sensitive  
 3 location . However , we have to also accept that he had  
 4 access to a number of those within a closer geographic  
 5 location as well .  
 6 Q. But the MAPPAs minutes go into detail in discussion of  
 7 risk about some aspects of his life , for example , the  
 8 potential dumper truck training . There's detailed  
 9 analysis of that . Why , if the minutes are  
 10 comprehensive , was there no mention , no specific  
 11 discussion of the risks involved in the London trip or  
 12 any means of mitigating those risks?  
 13 A. So in relation to mitigating those risks , my  
 14 understanding is that that would be part of the  
 15 logistics that would be arranged between offender  
 16 manager and police in terms of what steps the police  
 17 would do if that information is shared . In terms of the  
 18 dumper truck , that was a specific activity that we had  
 19 to understand in line with a specific licence condition  
 20 that we were approving , and understanding what a dumper  
 21 truck actually is , and then also looking at if that  
 22 increases his capability .  
 23 Q. Capability to commit a terrorist outrage?  
 24 A. So when we look at capability in the context of ERGs ,  
 25 an individual , let 's say , for example , who has a science

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1 degree in chemistry , has increased capability .  
 2 An individual who has been in the military has increased  
 3 capability . An individual who has access to organised  
 4 crime financing and firearms has increased capability .  
 5 An individual who has access to —  
 6 Q. Can I just pause you there . It 's a capability to commit  
 7 an outrage , not a capability to dump silage?  
 8 A. No . When we talk about capability in the context of an  
 9 ERG , we are looking at what capability the individual  
 10 possesses in terms of skills and access to resources .  
 11 Q. But the only context in which a dumper truck and the  
 12 ability to access and use a dumper truck could increase  
 13 an extremist's capability is related to their capability  
 14 to commit an attack , surely?  
 15 A. No , because as part of being employed as a dumper truck  
 16 driver , there's the fact that he would be working on  
 17 a site whereby he would have keys to heavy machinery and  
 18 that would increase his capability because we know a  
 19 dumper truck can cause a significant level of harm . So  
 20 it 's similar to any employment that potentially  
 21 increases capability . That's why there was a specific  
 22 discussion around that . It 's slightly different to risk  
 23 and imminence of risk .  
 24 Q. Finally , what would you suggest — what would you say if  
 25 this was suggested to you : that the professionals in the

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1 MAPPA meetings appear to have a collective blind spot  
 2 about the London meeting and its risks?  
 3 A. I would say that we always had risk at the forefront and  
 4 there was no evidence to suggest that there was  
 5 increased risk or imminence around that event.  
 6 MR HOUGH: Thank you very much. Those are all my questions.  
 7 MR PITCHERS: Sir, I have no questions.  
 8 JUDGE LUCRAFT: Thank you.  
 9 Mr Armstrong.  
 10 Questions by MR ARMSTRONG  
 11 MR ARMSTRONG: Mr Johal, my name is Nick Armstrong and I ask  
 12 you questions on behalf of Jack Merritt's family.  
 13 Can I just deal with some short specifics first of  
 14 all. We have an entry from you in Delius on  
 15 27 November 2019 where you discuss with Mr Skelton the  
 16 content of the ERG.  
 17 A. That's correct.  
 18 Q. We have no other entries from you in Delius?  
 19 A. That's correct.  
 20 Q. Does that tell us something about the intensity of your  
 21 involvement with this process?  
 22 A. I think that's a reflection on the competency and skills  
 23 of Mr Kenneth Skelton. In other regions and areas when  
 24 I was dealing with other semi-specialist probation  
 25 officers, there's always -- there has been, from my

1 experience, significant difficulties whereby they  
 2 struggle in terms of multi-agency working, they struggle  
 3 to share information appropriately and efficiently, and  
 4 whereby there is far more involvement from our team  
 5 specifically.  
 6 In the case of Mr Kenneth Skelton, he was  
 7 a competent probation officer. He built good working  
 8 relationships, and ultimately his need of support from  
 9 myself wasn't that much because of his skill set.  
 10 Q. He had about 20 years of experience in the Probation  
 11 Service, didn't he?  
 12 A. Yes, he did.  
 13 Q. And when you were a trainee in 2015, I think, he was in  
 14 that team?  
 15 A. He wasn't in the same team. He worked in the same  
 16 office.  
 17 Q. Okay. One of the problems with the Delius, and the real  
 18 reason I ask you about this, is that we can't see other  
 19 ERG entries or ERG interviews in the Delius. Do you  
 20 see?  
 21 A. That's correct.  
 22 Q. And that means that we can't tell, we can't check what  
 23 you say about how many times Usman Khan was interviewed.  
 24 Now, you told us two, you think?  
 25 A. I believe so, yes.

1 Q. Mr Skelton tells us in his witness statements that he  
 2 thinks there were two or three. Can you give us any  
 3 help with that?  
 4 A. My understanding was two.  
 5 Q. And he thinks that you were present for maybe one?  
 6 A. Okay.  
 7 Q. Does that sound right to you?  
 8 A. Again, my recollection isn't -- I believe -- in my  
 9 statement I say one or two, but trying to remember back,  
 10 I believe it was closer to two than one.  
 11 Q. I'm asking you that because in the later MAPPA --  
 12 I'm not going to ask people to turn it up again -- when  
 13 you say that he has moved on from his ideological  
 14 offending, you do it on the basis in August of your ERG  
 15 interviews?  
 16 A. Yes, so at the time of me making that representation, it  
 17 was based on the line of questioning and the interviews  
 18 that we'd completed.  
 19 Q. Sure. But that interview might have been, if  
 20 Mr Skelton's right, that might have just have been one  
 21 interview?  
 22 A. Potentially, yes, but Mr Skelton was also present in  
 23 that meeting, able to pick up on anything that I'd  
 24 missed or didn't agree with.  
 25 Q. You were brought in to help Mr Skelton because it was

1 his first ever ERG?  
 2 A. That's correct.  
 3 Q. How many had you done?  
 4 A. I believe at that point I'd done two.  
 5 Q. You had done two other than this one?  
 6 A. I believe so, yes.  
 7 Q. You believe it was?  
 8 A. Since that time there's been a number of ERGs that I've  
 9 completed. There's strict rules around who can do ERGs  
 10 so I have not just done it for my area, there are other  
 11 areas.  
 12 Q. So at best this was your third?  
 13 A. That's correct.  
 14 Q. Now, I just want to have a look at the content of this,  
 15 and I'm asking you, I hope, some brief questions about  
 16 this. Mr Hough has asked you some of the detail of this  
 17 and I just want to look at some basics.  
 18 Firstly, just note this: we will have, and we've  
 19 looked at it a little bit and we may go back to it in  
 20 a moment, Ieva Cechaviciute's ERG from April 2018, all  
 21 right? That is 54 pages long. This ERG, in draft, is  
 22 15 pages long, and the last page is blank, so it's  
 23 14 pages long. You see that that gives rise to  
 24 an immediate concern about intensity of review, do you?  
 25 A. So there's two points to that. Initially, each ERG is

1 not written in isolation ; they are to be read in  
 2 conjunction and they build upon previous ERGs.  
 3 Secondly, in relation to that point, the ERGs that are  
 4 completed in the community are slightly different to  
 5 those that are completed in custody. In the community  
 6 you have the complexity of it not being in the same  
 7 controlled environment that the individual is in, which  
 8 we know prison is a controlled and potentially false  
 9 environment in terms of enforced interaction with  
 10 specific individuals and agencies. That's not the same  
 11 as the community.  
 12 Q. I understand that. But that might not go to length  
 13 because one of the things that you have in a secure  
 14 environment is you have eyes on him all the time, don't  
 15 you?  
 16 A. You do, but you also have enforced contact with other  
 17 TACT offenders, which impacts on impression management,  
 18 which also, again, is why I say it's false, because if  
 19 an individual doesn't wish to involve themselves with  
 20 Terrorism Act offenders, it is very difficult when  
 21 you're that category in that prison with that many  
 22 terrorism offenders to avoid that contact. So that's  
 23 why I say it is a somewhat false environment, because  
 24 there isn't the freedom to demonstrate what their  
 25 motivations are and how they manifest themselves.

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1 Q. I don't want to talk about hypotheticals. Let's  
 2 actually talk about documents.  
 3 Can I just mention some basics about what an ERG  
 4 should contain, and I mean very basic. Can we just pull  
 5 up, please, {DC7437/1}, this is the ERG guidance. And  
 6 can we just go to {DC7437/103} for the moment, and this  
 7 is just very basic things. This is the recommended  
 8 report headings: front page, purpose and context of the  
 9 assessment, details of report author, assessment process  
 10 and information used. I'll just go through this fairly  
 11 briefly.  
 12 Mr Skelton's draft ERG doesn't contain a section on  
 13 his experience; do you remember that?  
 14 A. So yes, on reflection I can see that that doesn't but it  
 15 is a recommended report heading.  
 16 Q. These are just examples, I will be going into this in  
 17 more detail with Mr Skelton because I just want to flag  
 18 this because you are coming at this from the point of  
 19 view of a quality assessor, essentially, aren't you?  
 20 A. No, sir.  
 21 Q. You are bringing your specialism to bear to ensure that  
 22 he complies with something he hasn't done before and  
 23 you've done a couple of times?  
 24 A. Yes, so initially my support was around interviewing  
 25 because based on experience you need a range of

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1 interview questions that you need to cover so the  
 2 support was for interviews. That report is for Ken, who  
 3 is trained.  
 4 Q. Another basic thing, section 3, assessment process and  
 5 information used, the second bullet, it should set out  
 6 the information sources used. Now it doesn't do that  
 7 either, Mr Johal; did you see that?  
 8 A. Again, so (a) it's a draft interview, (b) there's the  
 9 support of intervention services, so I'm not the quality  
 10 assessor, I'm there to assist him and give my views on  
 11 his scorings and the input specifically. I didn't have  
 12 the final draft ahead of me and he does have the support  
 13 of intervention services if he needs it; it's his ERG.  
 14 Q. Well, I'm going to suggest that this is more substantive  
 15 than that because -- there's no point in me showing this  
 16 to you because it is blacked out, but we can see it, the  
 17 lawyers in the room can see it, and I'll just summarise,  
 18 at page 22 of this document there is an unsurprising  
 19 paragraph that talks about the information that is  
 20 obtained, and it says that the quality of the assessment  
 21 is informed by the quality of the information going in,  
 22 and it directs the decision-maker to go through various  
 23 categories of document and record them. That isn't done  
 24 in the ERG, your ERG, Mr Skelton's ERG?  
 25 A. Again, it was a draft document, and it had --

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1 Q. I see. Well, it was a draft document in November 2019,  
 2 having been started in July 2019, he had spent four  
 3 months, and had four months to put this kind of detail  
 4 in, hadn't he?  
 5 A. I think that's a question for Kenneth Skelton.  
 6 Q. Well, it's also a question for you because I am  
 7 wondering whether it sets off alarm bells about the  
 8 quality of this assessment?  
 9 A. So what we find with ERGs is very much that in the  
 10 community, the CTPO tends to do those ERGs. You don't  
 11 get any additional time allowance for completing an ERG  
 12 and we know in custody psychologists tend to get up to  
 13 36 hours to complete an assessment.  
 14 Ken, Kenneth to his credit, actively sought to  
 15 complete an ERG for his professional development.  
 16 That's the type of professional that Ken was.  
 17 I assisted in the interview itself. Ken did not need to  
 18 do the Extremism Risk Guidance assessment, but he wanted  
 19 to and he was allowed to do this one. There's strong  
 20 rules around which ERGs can be completed so if he had  
 21 completed the Healthy Identity Intervention he would not  
 22 be allowed to a subsequent ERG because there will be  
 23 potential bias. There was nothing to stop Kenneth, the  
 24 offender manager, completing an ERG for a case that he  
 25 knows very well.

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1 So in terms of any delays in writing that ERG, it's  
 2 potentially workload-related and he is best placed to  
 3 explain why there was a delay.  
 4 Q. Let me take another point. Can I just have a quick look  
 5 at leva, as I think we will call her, her assessment,  
 6 which is {DC5322/22} and can we look at paragraph  
 7 6.4.3.3, I am sorry to give a paragraph number as  
 8 opposed to a page. Very efficient. Thank you very  
 9 much, 6.4.3.3 and you see this. So in her assessment,  
 10 when she's going through engagement factors, she's  
 11 talking about this at the bottom:  
 12 "Mr Khan's need for status has consistently been  
 13 seen as a significant risk factor and during the current  
 14 assessment Mr Khan did not appear to have clear insight  
 15 into this risk area."  
 16 Then the whole of the rest of that lengthy  
 17 paragraph, and there are other paragraphs about the  
 18 status.  
 19 Mr Johal, you talked about this in your answers to  
 20 Mr Hough. You said you were concerned about his  
 21 status-seeking, the prestigious university might be  
 22 building it up, how he might hit the real world and that  
 23 then might be lost to him. Mr Skelton records the same  
 24 concern, has the same score about status as  
 25 Ms Cechaviciute, you both score it as strongly present,

1 both ERGs score it as strongly present, but there is no  
 2 text at all anywhere in this document about status.  
 3 A. In which one?  
 4 Q. In your document, in the document you were looking at  
 5 with Mr Skelton. There's no equivalent paragraph to  
 6 that. There's no discussion of the things that you told  
 7 Mr Hough?  
 8 A. So in relation to that, again, I led on those interview  
 9 questions and Kenneth will be best placed to explain  
 10 where he was with each section in terms of the draft and  
 11 going into the final draft. I can't explain why there's  
 12 certain text specifically missing.  
 13 Q. This is a section, when you draft one of these you work  
 14 through in order of the factors, don't you?  
 15 A. The ERG has basic templates of how you structure it, but  
 16 there's flexibility in how you address it. So you can  
 17 either speak through every single factor and say whether  
 18 it's present or not present. Alternative styles look at  
 19 identifying the most present and working your way down,  
 20 or there's ones that just focus on the ones that have  
 21 changed. There's no specific rigidity in how you  
 22 present the information and it's all related to previous  
 23 ERGs and how the work's going.  
 24 Q. Mr Johal, what I'm putting to you is the ERG 22+ is  
 25 called the ERG 22+ because there are 22 factors?

1 A. That's correct.  
 2 Q. And they are all in a list, and I think one of the  
 3 status issues comes about fourth in the first section,  
 4 doesn't it?  
 5 A. That's correct.  
 6 Q. And it's a significant factor, on any view, for Mr Khan,  
 7 as you talked about with Mr Hough?  
 8 A. That is true, yes.  
 9 Q. And if it is, as I say it is, absent from this ERG after  
 10 four months of consideration, that would be a concern,  
 11 wouldn't it?  
 12 A. If it was absent from the final draft copy that has been  
 13 checked either by someone to support Kenneth, or if he  
 14 has taken it to intervention services to have additional  
 15 support, then it would be a significant oversight, yes.  
 16 Q. So you say there was going to be a further iteration of  
 17 this which would presumably contain that material?  
 18 A. What I'm saying is when I provided that support to Ken  
 19 I had a read through it and I looked at where scoring  
 20 was heading and I provided feedback. I can't now sit  
 21 here and recall the specific feedback that I provided  
 22 him on this assessment.  
 23 Q. Can I just stay with Ms Cechaviciute's assessment, can  
 24 I just go to paragraph 8.2.3, the jury has seen this  
 25 before?

1 JUDGE LUCRAFT: I think the mystery about the name will be  
 2 solved later this week, I think, Mr Armstrong, so we'll  
 3 find out whether leva is the right way of doing it for  
 4 short.  
 5 MR ARMSTRONG: I'm going to continue experimenting.  
 6 So 8.2.3 is where it says:  
 7 "The observable behaviour in pre-contemplation —"  
 8 So just above 8.2.3 please, 8.2.2. So this is the  
 9 section in her report on page 34 where she talks about  
 10 stages to change model, which you will be familiar with,  
 11 then at 8.2.2 and 8.2.4 she talks about the fact that he  
 12 is somewhere between pre-contemplation and action, so he  
 13 may not be thinking about it at all or he may be  
 14 beginning to think about it.  
 15 There is no stages of change paragraph, section or  
 16 analysis anywhere in Mr Skelton's ERG.  
 17 A. Again, that's Mr Skelton's ERG who has the flexibility  
 18 to raise that ERG and present it how he sees  
 19 professionally fit. You have to remember that both  
 20 psychologists and probation officers are permitted and  
 21 trained to deliver ERG but they come at it from  
 22 different angles. It works in complementing each other  
 23 so again, Mr Kenneth Skelton is best placed to explain  
 24 these answers.  
 25 Q. Well, he is coming to you in principle because you are

1 the specialist CT probation officer, you have got three  
 2 times the experience that he does, being three rather  
 3 than one, of writing an ERG, and isn't this something  
 4 you should be picking up?  
 5 A. So should I be picking up the specific ---  
 6 Q. The absence of these key sections, Mr Johal?  
 7 A. If I was doing the ERG, there's no guarantee that  
 8 I would have done it the exact same way that you have  
 9 outlined it should be done, because everyone is ERG  
 10 trained and they complete the document in line with  
 11 their training that they've received. So from my  
 12 perspective, should I be telling him how to write the  
 13 ERG, no. Should I be giving him advice and guidance,  
 14 yes. It is his ERG to complete. I provide my kind of  
 15 views. Ultimately otherwise then I would just do the  
 16 ERG which isn't the agreement that we had.  
 17 Q. You would agree that knowing where Mr Khan is on his  
 18 stages of change, ie has he begun to change, or has he  
 19 started doing some change, is critical?  
 20 A. Yes. It's important, yes.  
 21 Q. And understanding whether there has been any change in  
 22 that over the course of a year is very critical?  
 23 A. Yes. And I believe that's addressed in other ways, not  
 24 necessarily using the stages of change.  
 25 Q. But you don't alert Mr Skelton to the fact that the

1 section that might analyse that is missing from his  
 2 report?  
 3 A. It's a section that might analyse it. That analysis of  
 4 change isn't missing.  
 5 Q. All right.  
 6 Now, Mr Hough put to you as well, just put this to  
 7 you, see if you can accept this, that he was putting  
 8 things to Mr Skelton and to you, it is recorded in this  
 9 document, that were inconsistent with the facts as we  
 10 know them to be, and you accept that they were.  
 11 A. They're inaccurate, yes.  
 12 Q. And you talk about terms of presentation management and  
 13 you knew that he was doing that.  
 14 A. We're aware that there's a difference between what the  
 15 CPS documentation says and what his interpretation of it  
 16 was.  
 17 Q. And your answer to Mr Hough was that that's okay because  
 18 this document ought to be read with other documents and  
 19 other people and once that is done, people will see the  
 20 inconsistencies and will understand them and be able to  
 21 understand what that means?  
 22 A. Not that's okay, but it's a case of when he's making  
 23 these inconsistencies, it's being made clear that they  
 24 are his words and his views around his offending.  
 25 Q. And the words "presentation management" or "impression

1 management" do not occur at all at any stage in the ERG  
 2 draft?  
 3 A. So, again, it's a part of how we manage a case. It's  
 4 not specifically the assessment that we make.  
 5 Q. Nor, any of those that you were talking to Mr Hough  
 6 about, nor do those words appear anywhere in your  
 7 witness statement?  
 8 A. Again, so we look at impression management as  
 9 a behaviour that everyone engages in. It's not specific  
 10 to risk. It's a case of how he chose to present  
 11 himself.  
 12 Q. But if he is choosing to present himself in a way that  
 13 is status-seeking and that is false, that is relevant in  
 14 Mr Khan's case to his offending profile?  
 15 A. I would say that is an inaccurate use of how  
 16 status-seeking intertwines with impression management.  
 17 Q. Can I just now look at the way you deal with this. We  
 18 can get involved in that conversation and we can talk  
 19 about whether it's presentation management and whether  
 20 it's risk or not and people could have a healthy  
 21 disagreement about that, couldn't we. Can I just look  
 22 at how you put it to MAPPA on 14 November. Can I see  
 23 {DC6417/6}, please. I might need the bottom half of  
 24 that. No, sorry I think Mr Hough is directing me to ---  
 25 I'm losing myself within the document. Back to the top

1 of that. Oh yes, sorry, penultimate paragraph in that  
 2 section:  
 3 "Nigel Byford queried whether any concerns had  
 4 arisen from UK's ERG. Sumeet Johal confirmed that the  
 5 findings were consistent with what had been discussed by  
 6 the Panel today."  
 7 So you are simply saying that their discussion about  
 8 things progressing is consistent with what you saw in  
 9 the ERG?  
 10 A. No, what I'm saying is that the key issues that we've  
 11 been discussing in MAPPA around employment, isolation  
 12 and status, et cetera, around Learning Together, is  
 13 consistent with the key issues that we're raising in ERG  
 14 in terms of the actual issues. As I answered before,  
 15 that was my opportunity to identify any significant  
 16 change in any of the engagement factors. If there was  
 17 a previous factor that was not present that was now  
 18 strongly present, I would be raising it then. If there  
 19 was a significant drop in anything, I would raise it  
 20 then. I think the fact that status remains strongly  
 21 present identifies our position around where he was with  
 22 his academic ventures and how that was impacting on him.  
 23 We weren't saying that Learning Together is the answer  
 24 to a status, because otherwise we would be saying: well,  
 25 Learning Together has answered that and now his

1 status-seeking type behaviour is now answered and  
 2 reduced, so that's where we were.  
 3 Q. We could get into that conversation too. I can put it  
 4 to you that the problem with Learning Together, or  
 5 a possible problem with Learning Together, is it takes  
 6 one anti-social status-seeking and replaces it with  
 7 a potentially prosocial status which is about to be  
 8 removed as he hits the hard reality of the actual world.  
 9 Those are all possible risk factors but, Mr Johal, just  
 10 before you answer that, what I'm putting to you is that  
 11 you get nothing from that in the MAPPA minutes. There's  
 12 no qualification to this, there's no discussion, there's  
 13 nothing other than unalloyed positivity here.  
 14 A. I have to say (a) the status-seeking was not going to be  
 15 removed, the status-seeking was going to be positively  
 16 challenged when the hard reality sets and we saw that  
 17 with Ken's comments around obviously keeping him  
 18 occupied. Secondly, the ERG was going to be written and  
 19 completed. I was not going to go through the detail  
 20 around ERG because that would be discussed at a later  
 21 MAPPA meeting. I was ultimately giving the fact that  
 22 the issues raised were consistent so that nothing was  
 23 being missed by MAPPA, that there was nothing in the ERG  
 24 that was reported that was not shared with MAPPA. That  
 25 was the purpose of me making those comments.

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1 Q. And this is -- when you talk about the concerns arising  
 2 from the ERG, and when you say that you're confirming  
 3 that the findings are "consistent with what had been  
 4 discussed by the panel today", that's the panel today on  
 5 14 November, you have not seen him and you have not  
 6 carried out any interviews since at least August, at  
 7 least three months earlier?  
 8 A. That's correct, but I was aware of --  
 9 Q. Since when he has lost his mentors and moved out of  
 10 approved premises?  
 11 A. Yes, but I have been sitting in MAPPA meetings and  
 12 I have oversight -- not oversight, but I have access to  
 13 Delius records and I know what is going on with the  
 14 case.  
 15 Q. But you haven't done with the intensive analysis of his  
 16 motivating factors or his risk factors that the ERG  
 17 achieves?  
 18 A. But what we did have with me and Ken was again  
 19 discussions of how that interview -- so when he leaves  
 20 that interview room we have a discussion amongst  
 21 ourselves around to how we feel that went and what the  
 22 key issues are, so that feedback is in relation to that.  
 23 If at that point I had any concerns around  
 24 increasing or new factors on the ERG that need to be  
 25 raised, I would have raised them there with Ken and

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1 highlighted them. I specifically recall the key point  
 2 that I made was this change in terms of his new-found  
 3 view that it was a selfish desire for him to move to  
 4 Pakistan as opposed to what he was saying previously.  
 5 I specifically recall having a conversation with Ken  
 6 regarding this is new, this isn't something that we've  
 7 raised before. So when I'm giving that feedback,  
 8 I'm basing it off my presence in the interview and my  
 9 discussion around where we were with those factors.  
 10 Q. Mr Johal, all I'm putting to you is that after a year of  
 11 now release and the absence of any OASys or an ERG until  
 12 after this draft ERG comes along, what we have is  
 13 a 14-page document that misses the basics and misses the  
 14 substance.  
 15 Now, Inquests of this kind, as you will know, are  
 16 involved in learning and reflection; do you think you  
 17 have any learning and reflection to do about the quality  
 18 of this ERG that you were part of?  
 19 A. So everyone's got learning to do in terms of their  
 20 professional development and the quality of work we do.  
 21 The OASys was not invalidated. The OASys risk  
 22 assessment still stood, it was still a valid document.  
 23 We have suggested appropriate timing of ERGs as  
 24 12 months post-release. You don't want to do the ERG  
 25 too soon because you don't actually capture what's going

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1 on with the case.  
 2 Q. I'm going to stop you. Do you think this ERG was  
 3 an adequate document or an adequate process?  
 4 A. In its draft form, no, it's not an adequate document  
 5 because it's not been completed. If I have sight of the  
 6 final completed document I could make that decision and  
 7 I can make that kind of comment, but until I have the  
 8 final document, I can't comment on its status.  
 9 Q. So it's not good enough but the final document might get  
 10 there?  
 11 A. Potentially yes, but, like I said, it was a draft.  
 12 Everyone has draft copies of multiple documents, so...  
 13 Q. You don't put that qualification to MAPPA, Mr Johal, at  
 14 any stage?  
 15 A. I make the qualification that the report is not written  
 16 and I report on the actual factors, so if I was trying  
 17 to say to MAPPA that this is exactly what's going to be  
 18 in the ERG and these are all the issues and I was trying  
 19 to give a comprehensive update, I would agree with your  
 20 point.  
 21 MR ARMSTRONG: Thank you, Mr Johal, no further questions.  
 22 JUDGE LUCRAFT: Thank you.  
 23 Anyone else?  
 24 Questions by MR BAUMBER  
 25 MR BAUMBER: Sir, Kevin Baumber, counsel for

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1 Staffordshire Prevent officers .  
 2 A. Yes.  
 3 Q. Mr Johal, just very briefly , you were asked questions  
 4 about the attendance at the Learning Together event and  
 5 you said that there was nothing to stop Mr Khan from  
 6 going to a city as an example; do you remember?  
 7 A. I do, yes.  
 8 Q. As you understood it, was there anything stopping him  
 9 from a probation point of view from simply just  
 10 attending the event at Fishmongers' Hall without  
 11 consulting anyone?  
 12 A. No.  
 13 Q. Can we have {DC5644/1}, please. The document on the  
 14 screen is the — are the licence terms, if we go to the  
 15 last page we'll see the date of these ones. If we can  
 16 zoom in there. We can see this is as of  
 17 8 November 2019. The licence conditions as they began  
 18 when he was first released were changed or relaxed in  
 19 certain ways during that year, weren't they?  
 20 A. Yes, that's quite common.  
 21 Q. But as of 8 November 2019, can we go up two pages to  
 22 (xv), please, bottom of {DC5644/2}:  
 23 "(xv) Not to attend or organise any meetings or  
 24 gatherings other than those convened solely for the  
 25 purposes of worship without the prior approval of your

1 Supervising Officer /not to participate directly or  
 2 indirectly in organising and/or contributing to any  
 3 demonstration, meeting, gathering or website without the  
 4 prior approval of your Supervising Officer."  
 5 So we have there not to attend a meeting or  
 6 gathering without supervisory officer approval, nor to  
 7 participate directly or indirectly at a meeting or  
 8 gathering without approval. Wouldn't that stop him  
 9 going to Fishmongers' Hall without probation approval?  
 10 A. Yes, so that — in terms of — if he went to that  
 11 meeting without permission, that would be a breach of  
 12 his licence condition, but he could physically have gone  
 13 and done it or attempted to breach his licence. That  
 14 condition is what he was given permission for on that  
 15 day, so apologies for your previous question, my  
 16 interpretation of it was slightly different. So that  
 17 licence condition prevents him going to that meeting  
 18 without our express approval.  
 19 Q. And over the page to {DC5644/3}, condition (xviii):  
 20 "Not to enter any [reading forwards] ... railway  
 21 station ..."  
 22 It was known that he was travelling by rail, wasn't  
 23 it?  
 24 A. Yes.  
 25 Q. So there is another condition there that he needed

1 specific approval for in order to attend the event in  
 2 the way he was doing?  
 3 A. Yes, so in relation to that as well, his GPS tag would  
 4 get set off if he enters into a railway station, so not  
 5 only did he need approval to use a train station and  
 6 enter a train station, we needed specific details of  
 7 what train he was going on and what time.  
 8 Q. The status quo or the default position here was that he  
 9 could not go to the Fishmongers' event because of his  
 10 licence conditions?  
 11 A. That's the default position, yes.  
 12 Q. The only way that he can go without breaching his  
 13 licence and risking the consequences of a recall to  
 14 prison for that would be upon the terms that we've seen,  
 15 namely with supervisor approval; yes?  
 16 A. Yes, so all licence conditions are: you can't do this  
 17 unless you have got approval, so he would need that  
 18 approval.  
 19 Q. Can we go back to (xv), bottom of {DC5644/2}. Would you  
 20 say that the decision in this instance of whether he  
 21 should get that approval is one for probation alone or  
 22 for MAPPA?  
 23 A. So it's one for MAPPA to make that decision. Ultimately  
 24 the — technically the responsible officer could in  
 25 theory give that permission without the consent of

1 MAPPA, but that would be very bad practice and is  
 2 unheard of. It's always MAPPA in relation to these  
 3 decisions because that's the best forum for this kind of  
 4 risk management and decision-making.  
 5 Q. And the execution of that decision, the giving of the  
 6 approval, because you would never expect the probation  
 7 officer to disagree with MAPPA, I'm not suggesting that  
 8 he did, but the execution of that decision of MAPPA on  
 9 whether he has permission to attend is for the  
 10 supervising officer and the terms of the licence, isn't  
 11 it?  
 12 A. Yes, because if there's ever a breach, the person  
 13 responsible for enforcing that is also the responsible  
 14 officer so they need to be the one that allows him to,  
 15 in theory, make that variation or allow him to breach  
 16 that — with permission, breach that condition.  
 17 Q. Whose responsibility would you say it is to raise the  
 18 question for MAPPA's consideration of should Khan be  
 19 allowed to go and, if so, how?  
 20 A. So that works in two ways, so during sessions with  
 21 the — Mr Khan, Kenneth Skelton would raise any specific  
 22 requests that he may have for MAPPA, and also in terms  
 23 of if he has any requests that would require MAPPA  
 24 approval, it goes via the offender manager. So it would  
 25 have gone through Kenneth Skelton, either directly as

1 a result of a request from Mr Khan or by virtue of  
 2 a request to attend an event that requires a variation  
 3 or approval of licence .  
 4 Q. Because of the way the licence is worded, probation  
 5 needed an informed decision from MAPPA on whether  
 6 he could attend, didn't they?  
 7 A. So it's -- probation needed -- in order for effective  
 8 MAPPA, yes, they needed the views of everyone around the  
 9 table .  
 10 Q. And if an issue like attendance like at Fishmongers' was  
 11 brought up but not directly answered by MAPPA, then it  
 12 would revert to a probation decision under (xv)?  
 13 A. Yes, but on this occasion that decision wasn't made in  
 14 isolation .  
 15 Q. You say you're confident there was an informed decision  
 16 by MAPPA on the attendance at the event?  
 17 A. There was an awareness by all at MAPPA that he was going  
 18 to that event, hence why we had that comment about the  
 19 logistics where it would be made outside of a meeting by  
 20 the police. Now, if the police did not approve of that  
 21 decision, it wasn't raised because they knew that  
 22 variation of licence was going to be made. Therefore it  
 23 is my understanding and view that all parties were aware  
 24 that this condition was going to be permitted.  
 25 Q. An awareness of the event: do you say that's the same

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1 thing as an informed decision on whether he should  
 2 attend?  
 3 A. Can you repeat the question?  
 4 Q. Is an awareness of the event, certainly MAPPA is aware  
 5 that the trip is planned or he has been invited to the  
 6 event, but Mr Hough asked you questions about whether  
 7 the decision had been an informed one, the thing had  
 8 been looked at in any detail; you say that awareness  
 9 itself is enough?  
 10 A. Awareness of the event, awareness that it requires  
 11 travel via train, and the awareness of police colleagues  
 12 of what the licence conditions are because they've got  
 13 copies of his licence, are fully aware of licence  
 14 conditions, yes.  
 15 Q. And so is the probation default position that he can go,  
 16 and only will be stopped if MAPPA disagree?  
 17 A. No. The position is that the licence conditions prevent  
 18 him from going unless he has permission, and permission  
 19 will only be given if the probation officer, Kenneth  
 20 Skelton, is happy with the MAPPA decision and MAPPA are  
 21 happy to allow Ken to do that.  
 22 MR BAUMBER: No further questions, thank you.  
 23 JUDGE LUCRAFT: That looks, Mr Hough, as if -- you said  
 24 confidently we would finish by 4.30 -- give or take four  
 25 minutes, has proved to be right.

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1 MR HOUGH: Yes, thank you, sir. I have nothing further.  
 2 Thank you very much, Mr Johal.  
 3 JUDGE LUCRAFT: Thank you, Mr Johal.  
 4 Mr Hough, we will pause there. I think tomorrow  
 5 we've got Mr Skelton coming.  
 6 MR HOUGH: Yes.  
 7 JUDGE LUCRAFT: So the jury will see that certainly  
 8 Mr Armstrong indicated there were the details that he  
 9 would go through there, so we'll turn to that tomorrow  
 10 morning, ladies and gentlemen, at 10 o'clock. Thank you  
 11 very much.  
 12 (In the absence of the jury)  
 13 I suspect, Mr Hough, that you will in fact be going  
 14 through quite a lot of the detail, so it may well be  
 15 that some of that's going to be covered anyway?  
 16 MR HOUGH: Yes, there's obviously quite a lot of material to  
 17 cover with Mr Skelton.  
 18 JUDGE LUCRAFT: Yes, we're expecting him to last the day  
 19 tomorrow.  
 20 MR HOUGH: He is slated to last the day and that is, we  
 21 think, a realistic estimate.  
 22 JUDGE LUCRAFT: Thank you very much. I'll rise.  
 23 (4.35 pm)  
 24 (The hearing adjourned until 10.00 am on  
 25 Wednesday, 5 May 2021)

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