

OPUS2

Fishmongers' Hall Inquests

Day 22

May 13, 2021

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1 Thursday, 13 May 2021
 2 (9.45 am)
 3 (In the presence of the jury)
 4 JUDGE LUCRAFT: Good morning, everyone. Very nice to see
 5 you all.
 6 Mr Hough.
 7 MR HOUGH: Sir, today's witness is Witness A, an officer of
 8 the Security Service. May I first check that she is
 9 either within the booth or is being brought through to
 10 the booth?
 11 THE WITNESS: Yes, I'm here.
 12 MR HOUGH: Sir, may I first summarise the orders you made in
 13 your directions dated 1 April 2021. This witness is to
 14 be referred to as "Witness A". No question may be asked
 15 which might lead to her identification. She is, as we
 16 see, being screened from all in court. Electronic
 17 devices in court and in the overflow court are to be
 18 switched off, except for devices required for official
 19 transcription, devices required for the Opus system, and
 20 laptops and tablets used by lawyers for purposes other
 21 than recording or noting Witness A's evidence. No
 22 recording may be made of Witness A's evidence save for
 23 the official recording of the court. Her evidence is
 24 not to be publicly disclosed until we, Counsel to the
 25 Inquest, give confirmation. Links may be disabled when

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1 she enters and leaves court, and you have made an order
 2 under section 11 of the Contempt of Court Act 1981 that
 3 there may be no publication of her name or identifying
 4 information about her in connection with these Inquests
 5 or their subject matter.
 6 Sir, you have also made supplementary orders that
 7 live video links and any live audio feed to locations
 8 outside this building are to be discontinued during
 9 Witness A's evidence and that the live link to the
 10 overflow court is limited to a non-internet-based
 11 connection.
 12 The effect of these orders is that nobody may make
 13 notes on computer of Witness A's evidence while it is
 14 being given, however, anyone may make manuscript notes.
 15 The purpose of the order that Witness A's evidence is
 16 not to be publicly disclosed, including by journalists
 17 until we confirm, is that if this witness were to reveal
 18 some sensitive information in error, steps could be
 19 taken to ensure that it would not be published. That is
 20 why there is to be no live reporting during each period
 21 of evidence.
 22 We shall try to give confirmations quickly at or
 23 after each break to assist with early recording, and
 24 transcripts of evidence will be provided to the press at
 25 the half-day point to enable them to report.

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1 JUDGE LUCRAFT: Thank you very much, Mr Hough.
 2 People will notice that I normally type on
 3 a computer myself, and I am doing that which I have
 4 directed everyone else to do, which is to make
 5 a handwritten note, so that's just to make sure that we
 6 all abide by the same things.
 7 I know that occasionally I will see people using
 8 a keyboard in front of me, but I know that's probably
 9 just to access, or should only be to access documents on
 10 the Opus system.
 11 Mr Hough, we will take the same process that we have
 12 with other witnesses, which is to take a break at
 13 a convenient stage. It really goes without saying, but
 14 I ought to just say that obviously if Witness A required
 15 a break at any time, she just needs to let us know and
 16 we will rise. I would say that to any witness, but
 17 I'm conscious that there are particular arrangements
 18 that will need to be made, should that arise.
 19 MR HOUGH: Can the witness please be sworn?
 20 Witness A, do you have an oath card and if
 21 necessary, any holy book?
 22 A. I do, yes.
 23 MR HOUGH: Could you please give the oath or affirmation.
 24 WITNESS A (sworn)
 25 Questions by MR HOUGH QC

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1 MR HOUGH: Can you confirm that you are the witness being
 2 referred to in this case as "Witness A"?
 3 A. Yes, I can.
 4 Q. I'm asking you questions first on behalf of the Coroner
 5 and then you will have questions from other lawyers; do
 6 you understand?
 7 A. Yes.
 8 Q. I'm going to ask you to confirm various things before we
 9 get into the body of your evidence. Can you confirm
 10 that you are an officer of the Security Service, MI5?
 11 A. I am.
 12 Q. Can you confirm that the purpose of your evidence is to
 13 explain the background to MI5 investigations generally,
 14 and more specifically, MI5's investigations into
 15 Usman Khan in the years before the attack?
 16 A. Yes.
 17 Q. Can you confirm that you're giving evidence to these
 18 Inquests as a representative of the Service and about
 19 investigations in which you weren't personally involved?
 20 A. That's correct.
 21 Q. Can you confirm that you have with you in the booth
 22 a copy of your witness statement, annotated only with
 23 some brief notes which I have seen to help you navigate
 24 your evidence and to ensure you avoid disclosing
 25 anything inappropriate?

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1 A. That's correct.
 2 Q. To be clear, is it possible that you may respond to some
 3 of my and others' questions by saying that for security
 4 reasons, you can't give an answer or can only give
 5 a limited answer, or would need to consult others before
 6 giving an answer?
 7 A. That is correct. I will do my very best to be as open
 8 as I possibly can, but that might be a limitation.
 9 Q. May there also be some questions that you can't answer
 10 for legal rather than national security reasons?
 11 A. Yes.
 12 Q. As regards security concerns, can you confirm that in
 13 particular you need to be careful not to reveal
 14 intelligence methods or compromise investigations in
 15 such a way as to harm national security?
 16 A. That's correct.
 17 Q. Is this also right: that it's a policy of the service to
 18 respond to some questions by neither confirming nor
 19 denying, for example, any questions about whether
 20 particular persons are currently under investigation?
 21 A. That's correct.
 22 Q. And, to be clear, is it right that such an answer isn't
 23 code for yes or code for no, but reflecting a policy
 24 approved by the courts?
 25 A. That's correct.

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1 Q. However, as you've indicated, have you done a great deal
 2 of work with colleagues to ensure that you can be as
 3 open and helpful to this [Inquest] as possible?
 4 A. Yes.
 5 Q. Can you also confirm that the Security(?) has given full
 6 cooperation to the Inquest team and has provided the
 7 original investigation documents to security—cleared
 8 members of the Coroner's legal team?
 9 A. Yes, that's correct.
 10 Q. With that long introduction, may I ask you a little
 11 about your personal background. For how long have you
 12 worked for MI5?
 13 A. I've worked for MI5 for 16 years.
 14 Q. Have you worked in a variety of roles?
 15 A. I have worked in a variety of roles, from investigations
 16 to human resources to strategy.
 17 Q. What's your current position?
 18 A. I'm a deputy director.
 19 Q. What was your position between 2013 and 2015, which may
 20 be of relevance to us?
 21 A. I was a senior manager in the counter—terrorism
 22 division.
 23 Q. May I turn now to MI5's functions, its tools, and the
 24 legal framework which you address from pages 4—6 of your
 25 statement. Is it right that the Security Service Act of

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1 1989 puts MI5 on a statutory footing?
 2 A. That's correct.
 3 Q. Does section 1 of that Act specify the function of the
 4 Service as the protection of national security in
 5 various particular respects?
 6 A. Yes.
 7 Q. One being protection against threats from espionage,
 8 terrorism and sabotage?
 9 A. That's correct.
 10 Q. Is MI5 guided by the government's national security
 11 strategy, identifying threats to national security?
 12 A. Yes.
 13 Q. Is one of those terrorism?
 14 A. That's correct.
 15 Q. Does MI5, in the pursuit of those aims, have a range of
 16 tools and techniques to support its investigations?
 17 A. We do, yes.
 18 Q. You address them at paragraph 18 of your statement, but
 19 can you confirm that they include the following, in
 20 general terms. First of all, surveillance, including
 21 observing individuals and intrusive surveillance, such
 22 as by eavesdropping devices?
 23 A. That's correct.
 24 Q. Secondly, interception of communications, including
 25 emails and phone calls?

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1 A. Yes.
 2 Q. Thirdly, equipment interference, such as covertly
 3 accessing computers and other devices?
 4 A. Yes.
 5 Q. Fourthly, the use of agents who provide information,
 6 sometimes called covert human intelligence sources, or
 7 CHIS?
 8 A. Yes.
 9 Q. Fifthly, obtaining communications data from service
 10 providers, including the use of bulk data?
 11 A. That's correct.
 12 Q. And, sixthly, the monitoring and reviewing of bulk
 13 personal data about large numbers of people in
 14 a targeted way to discover information?
 15 A. That's correct.
 16 Q. Looking at your paragraph 19, what is the governing
 17 principle for the use of these powers?
 18 A. The governing principle is that we will use our powers
 19 only when they are absolutely necessary, and in
 20 proportion to the threat posed.
 21 Q. Is the use of the powers governed by statutes, in
 22 particular, the Regulation of Investigatory Powers Act
 23 2000, and the Investigatory Powers Act 2016?
 24 A. That's correct.
 25 Q. Under those acts, does the use of quite a number of

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1 those powers, notably the more intrusive ones, have to
 2 be authorised within MI5 with an explanation as to why
 3 the action is necessary and proportionate?
 4 A. That's correct.
 5 Q. Do certain powers, such as interception of
 6 communications, also have to be authorised by warrant
 7 from the Secretary of State?
 8 A. That's correct.
 9 Q. And since relevant parts of the 2016 Act came into
 10 force, do judicial commissioners also have to approve
 11 such warrants?
 12 A. They do, yes.
 13 Q. In addition, is MI5 subject to oversight by the
 14 executive in the form of the Home Secretary and the
 15 legislature, notably in the form of the Intelligence and
 16 Security Committee of Parliament?
 17 A. That's correct, yes.
 18 Q. And, in addition, is the judicial oversight by the
 19 Investigatory Powers Tribunal considering any complaints
 20 about the conduct of the intelligence services?
 21 A. That's correct.
 22 Q. May I now ask you about investigative processes of the
 23 service, your pages 7–15. First of all, subjects of
 24 interest at paragraph 26. What is the definition of
 25 a subject of interest?

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1 A. A subject of interest is someone or something that has
 2 been investigated because they're being suspected of
 3 being a threat to national security.
 4 Q. Does each subject of interest have a record called a key
 5 information store?
 6 A. That's correct.
 7 Q. For each active subject of interest, is there a lead
 8 investigator who is responsible for reviewing and
 9 grading intelligence which comes in, and maintaining
 10 that record?
 11 A. Yes.
 12 Q. How many subjects of interest or SOIs are there under
 13 active investigation?
 14 A. At the time there were around 3,000.
 15 Q. You say "at the time": is that at the time of the attack
 16 or a time before that?
 17 A. Over the course of 2019.
 18 Q. Over the same time period, how many closed subjects of
 19 interest were there, that's to say people who — people
 20 and things who were subjects of interest but have been
 21 subject to closure?
 22 A. Over 40,000.
 23 Q. Does closure, in this context, mean the closure of
 24 investigation into that SOI?
 25 A. That's correct.

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1 Q. May I now ask you about prioritisation of intelligence
 2 and investigations in the particular context of
 3 terrorist investigations. Paragraph 29. When
 4 intelligence comes into the service, is it subject to
 5 triage?
 6 A. Yes, it is.
 7 Q. Just some terms, first, please. What is a lead in this
 8 context?
 9 A. A lead is a piece of information that comes in which
 10 requires further work to understand whether it's likely
 11 to pose a threat or not.
 12 Q. What is a trace?
 13 A. A trace is where we check against our records to see
 14 whether there's anything that we already hold on that
 15 bit of information.
 16 Q. When intelligence is received, is it taken forward as
 17 a lead or a trace?
 18 A. It's usually traced first and then potentially taken
 19 forward as a lead, and then that might be further
 20 developed into an investigation if it warrants it.
 21 Q. If information is linked to an existing investigation,
 22 would it usually be passed to the relevant investigative
 23 team?
 24 A. That's correct.
 25 Q. And if not, is the intelligence assessed with the

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1 possibility of a new investigation being initiated?
 2 A. Yes, that's correct.
 3 Q. Where new counter-terrorist lead intelligence and threat
 4 reporting is received which isn't linked to an existing
 5 investigation, is it managed through something called
 6 the intelligence handling model?
 7 A. Yes, that's right. That's a joint model we have with
 8 our CT policing colleagues.
 9 Q. How, in simple terms, does that operate?
 10 A. So we will review the piece of information looking at
 11 risk to national security, credibility, actionability,
 12 and proportionality, and then we'll decide whether or
 13 not further work is required.
 14 Q. Now, is it right that at any time, MI5 has a number of
 15 active investigations into individuals and groups linked
 16 to or suspected of terrorist activity?
 17 A. Yes.
 18 Q. Are these prioritised in accordance with four priority
 19 categories?
 20 A. That's correct.
 21 Q. May we put on screen, please {WS5052/9}, and the upper
 22 part of the page. This is part of your witness
 23 statement. Can you summarise what the priority levels
 24 are?
 25 A. So a Priority 1 is where there would be credible and

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1 actionable intelligence of significant or smaller scale
 2 attack—planning, that's probably the most at—risk
 3 investigations that we run.
 4 Priority 2, 2H and 2M, cover the extremist activity
 5 linked to attack—planning, it might be travel overseas
 6 to undertake fighting, or large—scale fundraising.
 7 A P2M is the medium—size, slightly smaller scale
 8 activity. A P3 is where you have individuals or
 9 networks that might require some further work to
 10 determine whether they pose a threat, and then our
 11 Priority 4 category, which is our lowest category of
 12 investigations, that's for individuals who have
 13 potentially previously posed a threat to national
 14 security, such as a released terrorist prisoner, who are
 15 judged not currently involved in this kind of activity,
 16 but there is judged to be a risk of potential
 17 re—engagement.
 18 Q. Are these priority levels, as assigned, tested regularly
 19 at senior management level?
 20 A. They are, yes, through our quarterly review process.
 21 Q. May they be changed at any time during an investigation?
 22 A. They can, at any time.
 23 Q. On a weekly basis, are investigations of the highest
 24 priority identified in something called a grid?
 25 A. That's correct.

1 Q. Is that done in a meeting led by the head of
 2 investigations?
 3 A. Yes, that's correct.
 4 Q. Without any sensitive detail, is it fair to say that
 5 a modest number of investigations within the grid
 6 inevitably take up a fair amount of MI5's resources?
 7 A. Inevitably our highest priority resources do take up
 8 a large proportion of resources.
 9 Q. When we talk about resources, is it right that we're not
 10 only, or even primarily, talking about money?
 11 A. That's correct.
 12 Q. Are we primarily talking about matters such as trained
 13 and experienced staff?
 14 A. That's one aspect. It might also be the tools and
 15 techniques that we need to use.
 16 Q. Next, please, prioritisation of subjects of interest,
 17 and we can take the page off screen.
 18 First of all, holding codes. Can you tell us what
 19 a holding code is and what purpose it serves?
 20 A. A holding code is a category of information to describe
 21 why MI5 is holding an information on an individual.
 22 It's an information management tool rather than a risk
 23 tool, as such.
 24 Q. Next, please, may I ask you about the system of
 25 allocating subjects of interest to tiers, and for this

1 purpose may we again put on screen your witness
 2 statement, {WS5052/10}, and paragraph 35, and maximise
 3 paragraph 35. Can you explain to us how subjects of
 4 interest are categorised into tiers?
 5 A. So tiers are a way of determining the difference between
 6 different individuals within an investigation. It's
 7 a way, if you like, of prioritising individuals within
 8 a particular investigation, because not everybody would
 9 be treated in the same way. A tier 1 would be the main
 10 target of an investigation, and then working through the
 11 tiers, down to tier 3, which would be contacts of
 12 potential SOIs within an investigation.
 13 Q. So, for example, with a counter—terrorist investigation
 14 into a group, you may have core members of the group who
 15 may be in higher tiers, and then loose associates who
 16 may be in lower tiers?
 17 A. That's correct.
 18 Q. What's the practical effect of an individual being in
 19 a tier or being moved from one tier to another?
 20 A. The practical effect is that resources are more likely
 21 to be dedicated towards the main targets of
 22 investigation.
 23 Q. We can take that off screen now.
 24 You've told us about how investigations are opened:
 25 a lead initiating an investigation. While

1 an investigation is running, is it right that the
 2 operational officers use their various powers to pursue
 3 the investigation into the targets of the investigation
 4 who may be one or multiple individuals?
 5 A. Yes.
 6 Q. Is it right to say that week by week, decisions get made
 7 about how resources are to be used in the investigation?
 8 A. That's correct.
 9 Q. Now, because the investigation into Khan was closed
 10 between February 2015 and August 2018, and because there
 11 was a possibility of it being closed towards the end of
 12 the period we're concerned with, we need to hear from
 13 you about procedures for closure of investigations.
 14 What does the closure process involve?
 15 A. So SOIs are closed where they no longer meet the
 16 threshold for an investigation such as where it is
 17 assessed that they are not or no longer engaged in
 18 activities of national security concern. We will, if
 19 there is police colleagues involved, we will have
 20 a conversation with our police colleagues to decide
 21 whether or not that is the case, and if that is the
 22 case, we will close the investigation.
 23 Q. After closure of an investigation, do the SOIs within
 24 that investigation become closed SOIs?
 25 A. They do, yes.

1 Q. Are continued investigative tools applied against them
 2 for any purposes, in general terms?
 3 A. No, there is no proactive work done against a closed
 4 subject of interest .
 5 Q. May it be that further intelligence comes in regarding
 6 that person from a range of sources?
 7 A. Yes, that's definitely the case, and it would still be
 8 triaged in the normal way, and then should we decide
 9 that a threshold was met, then we could re-open
 10 an investigation if we felt it was necessary.
 11 Q. Next I'm going to ask you about internal reviews, and
 12 your paragraph 46. Is it right that investigations are
 13 subject to a range of internal review processes to
 14 ensure quality and keep an eye on the investigations
 15 from a management perspective?
 16 A. Yes, that's correct.
 17 Q. First of all, is there something called the Strategic
 18 Intelligence Group, a group outside the investigative
 19 team?
 20 A. Yes, they work alongside our investigative team and can
 21 provide assessments.
 22 Q. Secondly, each week is there a meeting involving the
 23 head of counter-terrorism reviewing developments
 24 including updates from leading operations and that
 25 leading into the identification of the investigations in

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1 the grid?
 2 A. Yes, that's correct.
 3 Q. Is there also a weekly senior management team for
 4 counter-terrorism who meet to consider a dashboard of
 5 wider resourcing issues?
 6 A. Yes, that's right .
 7 Q. Is the director general of the service briefed weekly on
 8 main developments and risks?
 9 A. Yes, he is .
 10 Q. Every three weeks, so every quarter, is there a review
 11 of counter-terrorism casework by senior investigative
 12 managers and their teams?
 13 A. Yes, that's right .
 14 Q. What are the subject of discussions at such reviews in
 15 general terms?
 16 A. In general terms we would look at levels of coverage,
 17 assurance, prioritisation , gaps across the
 18 investigations , and whether we were meeting our
 19 objectives for the investigation .
 20 Q. Looking externally, is there a regular weekly briefing
 21 from MI5 to the Assistant Commissioner for Special
 22 Operations of the Metropolitan Police?
 23 A. Yes.
 24 Q. And, finally, are discussions held each month between
 25 the Director of Counter-Terrorism in MI5 with the two

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1 other intelligence services , the Secret Intelligence
 2 Service and GCHQ, about strategic matters?
 3 A. Yes.
 4 Q. May I now turn to MI5 and counter-terrorist policing,
 5 your paragraph 47. Over the years, is it right that
 6 close working arrangements have developed between MI5
 7 and counter-terrorist police?
 8 A. Yes, that's correct .
 9 Q. In simple terms, how do counter-terrorist police support
 10 MI5 investigations?
 11 A. The role of counter-terrorism policing includes
 12 gathering evidence, intelligence , to help prevent,
 13 disrupt and prosecute terrorist-related activities .
 14 They carry out arrests and other executive action in
 15 conjunction with us.
 16 Q. In a priority investigation , are there a series of means
 17 and structures by which MI5 and the counter-terrorist
 18 police work together?
 19 A. Yes, there are .
 20 Q. So at the highest level , can something be convened
 21 called an Executive Liaison Group?
 22 A. Yes, that's right . That's the senior level that sets
 23 the strategy for an investigation that's likely to
 24 result in a disruptive action. There isn't always
 25 an Executive Liaison Group meeting, but it can be put in

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1 place if required .
 2 Q. Is this the position: during an investigation , if MI5
 3 and/or the counter-terrorist police consider that it's
 4 necessary to form one of these groups to look at
 5 disruptive action or prosecution -- charging and
 6 prosecution, that an ELG, an Executive Liaison Group,
 7 can be formed?
 8 A. Yes, that's correct .
 9 Q. Just to be clear , to get this out of the way, was such
 10 a group ever formed in the case of Usman Khan after his
 11 release from prison?
 12 A. No.
 13 Q. In a priority investigation , will there often be
 14 meetings called JOT or joint operations team meetings?
 15 A. Yes, that's correct .
 16 Q. Will those meetings be chaired by the team leader of the
 17 MI5 operational team responsible for the investigation ?
 18 A. Yes.
 19 Q. Who else will attend typically ?
 20 A. Usually the police senior investigating officer will
 21 attend, together with other parties from
 22 the Security Service who are involved in the
 23 investigation .
 24 Q. Will there also be regular communication and
 25 information-sharing between the MI5 team and the

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1 counter—terrorist police colleagues?
 2 A. Yes.
 3 Q. In practice, may that be communications by email or by
 4 phone?
 5 A. Yes.
 6 Q. And between, either at the high level, the MI5 head of
 7 the investigation and the counter—terrorist police
 8 senior investigating officer, or at lower level, between
 9 members of the teams?
 10 A. That's correct.
 11 Q. So is this right, if we envisage it in this way: that
 12 for an investigation there will be an MI5 operational
 13 team with its own head, and a counter—terrorist police
 14 investigation with a senior investigating officer at the
 15 top?
 16 A. Yes, that's right.
 17 Q. And they will work alongside each other; yes?
 18 A. Yes, I would say it's very joint.
 19 Q. With the MI5 team using their tools to pursue the
 20 investigation?
 21 A. Yes.
 22 Q. Calling on the police in particular where action may be
 23 needed using police powers?
 24 A. Yes.
 25 Q. But also communicating with them to keep them up to

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1 speed?
 2 A. Yes.
 3 Q. In the context of a live investigation into a subject of
 4 interest, such as Usman Khan, who leads the joint
 5 investigation?
 6 A. MI5 is in the lead.
 7 Q. What does that mean in practice?
 8 A. It means that we set the strategy and we're responsible
 9 for managing the investigation right up until the point
 10 at which we might seek to effect a disruption, but we
 11 work very, very closely with our police colleagues in
 12 making sure that we've got the right sort of coverage in
 13 place for an investigation.
 14 Q. We'll hear about risk assessments that were made by MI5;
 15 in practice, are those made jointly with police
 16 colleagues, or made by MI5 on their own and then
 17 considered by police colleagues?
 18 A. So we will make risk assessments in an investigation,
 19 and we will share them with our police colleagues and
 20 discuss them. I would say it is a joint process but
 21 ultimately until the point of disruption, MI5 are in the
 22 lead.
 23 Q. Typically, how regular will the contact be between the
 24 MI5 team and the police team?
 25 A. It really depends from investigation to investigation,

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1 but typically it would be almost on a daily basis
 2 through phone calls, emails, and meetings.
 3 Q. Are there any constraints, in general terms, on what
 4 information and intelligence can be shared with the
 5 senior investigating officer and the members of his or
 6 her police team?
 7 A. There would be very little by way of constraints, other
 8 than the strict need—to—know information, but there is
 9 generally not that much of that.
 10 Q. Where a subject of interest is an inmate in prison, what
 11 information—sharing generally takes place between MI5
 12 and the Prison Service, including the counter—terrorism
 13 and security departments at the prison?
 14 A. So we would generally receive a regular stream of
 15 intelligence relating to a subject of interest for
 16 an open investigation.
 17 Q. Will you also have access routinely to documents such as
 18 intelligence reports from the prison?
 19 A. So we receive a range of intelligence. I can't comment
 20 on the detail of exactly what form they might take.
 21 Q. Would you also, as a matter of routine, receive
 22 documents such as OASys assessments and ERGs which
 23 comment on the risk posed by an SOI?
 24 A. As I say, I am afraid I can't comment on the detail of
 25 the types of information and intelligence that we

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1 receive from the Prison Service, but we do receive
 2 a fairly steady stream.
 3 Q. Where a subject of interest is a released prisoner on
 4 licence, what information—sharing takes place in
 5 practice between the MI5 and counter—terrorist police
 6 team on the one hand and the Probation Service and their
 7 officers on the other?
 8 A. So MI5 wouldn't have direct contact with the Probation
 9 Service. All contact would be done through our CT
 10 policing colleagues.
 11 Q. Would you expect those CT policing colleagues to have
 12 reasonably direct and regular communications with the
 13 probation officers responsible for the released
 14 prisoner?
 15 A. Yes.
 16 Q. Where an SOI is a released terrorist offender subject to
 17 part 4 notifications, we have heard that that person
 18 would be subject to overt management by a police team,
 19 in this case, the Staffordshire Prevent Team headed up
 20 by Sergeant Forsyth. Typically, does
 21 information—sharing take place directly between MI5 and
 22 such an overt management team?
 23 A. No, it doesn't.
 24 Q. Is there indirect information—sharing?
 25 A. There is the possibility for information—sharing if it's

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1 appropriate to do so. We share our information with CT
 2 police colleagues, and they would decide what required
 3 onward transmission.
 4 Q. Would the MI5 team also have a view or an input into
 5 what was shared with the overt management team of the
 6 police?
 7 A. If we were asked for a view, we would certainly give
 8 one. The idea is to avoid any inadvertent disclosures
 9 by bringing those who are dealing directly with
 10 an offender too close to the covert investigative
 11 strategy. It's not to say that it's a totally permanent
 12 barrier, but it's carefully there to manage any
 13 inadvertent disclosure.
 14 Q. Is that, in simple terms, because those overtly managing
 15 the offender will have regular contact with them and
 16 that you want to avoid the risk that a person in that
 17 position discloses anything about the covert
 18 investigation?
 19 A. That's correct.
 20 Q. We have heard that many subjects of interest, after
 21 release from prison, would be subject to MAPPAs
 22 processes, with regular MAPPAs meetings to assess risk,
 23 and make decisions about the management of that
 24 offender. Are you familiar with those processes?
 25 A. Yes.

1 Q. Does any information—sharing take place, directly or
 2 indirectly, between the MI5 investigation team and the
 3 MAPPAs meetings?
 4 A. Not directly, no, we don't play a formal part in MAPPAs,
 5 but if there is information to be shared, our CT police
 6 colleagues do attend the MAPPAs meetings and can share
 7 that information where they see fit to do so.
 8 Q. Are you able to say whether MI5 officers sometimes,
 9 always or never attend MAPPAs meetings?
 10 A. I'm able to confirm that we did attend some meetings,
 11 but I'm not able to confirm which meetings that we
 12 attended.
 13 Q. Now, as your answers so far have indicated, the MAPPAs
 14 procedure is quite distinct from the procedure of the
 15 joint investigation team with its JOT meetings. Are you
 16 aware that the serious case review of MAPPAs in this case
 17 expressed concerns about there being these two parallel
 18 processes for managing the offender: the JOT process
 19 involving the covert investigation teams, and the MAPPAs
 20 process?
 21 A. I'm aware of those comments, yes.
 22 Q. What's your view on them?
 23 A. I think that the two processes are quite different. The
 24 JOT process is to manage a covert investigation into
 25 whether somebody is going to engage in terrorist-related

1 activities, whereas the MAPPAs process is about managing
 2 the overt offender in the community. Obviously there
 3 needs to be a point at which those two processes come
 4 together, and in 2019 that process, or 2018/2019, that
 5 point at which they came together was played by our CT
 6 policing colleagues who, if you like, formed the bridge
 7 from the covert world into the overt world.
 8 Q. Now, you've confirmed also that there was another bridge
 9 into the overt world, which is MI5 officers attending
 10 some MAPPAs meetings, although you can't confirm which.
 11 Are you able to say whether MI5 officers attending
 12 MAPPAs meetings would be in listening mode or in speaking
 13 mode, whether they would simply be receiving information
 14 or contributing to the discussions?
 15 A. We were in receiving mode.
 16 Q. However, if something arose from a MAPPAs meeting, either
 17 which you received directly from the officers attending,
 18 or indirectly through CT police attending, and MI5 was
 19 concerned about a view being taken or a decision being
 20 proposed, what would you do about it?
 21 A. So we would have a route through our CT police
 22 colleagues through which we could pass information and
 23 they could pass information back to us, so that there
 24 was definitely a sort of conduit, if you like, through
 25 CT policing colleagues.

1 Q. So if you heard that something was being decided in
 2 a MAPPAs meeting, you, MI5, heard that something was
 3 being decided in a MAPPAs meeting which posed a risk to
 4 the public or to national security, would the means of
 5 you doing something about that be to tell your CT police
 6 colleagues and have them feed back to the MAPPAs
 7 participants?
 8 A. If we had any intelligence of concern, we would
 9 definitely have fed it through to our CT policing
 10 colleagues who would be able, in turn, to pass that on
 11 to the MAPPAs.
 12 Q. And they may not be able to say what the intelligence
 13 is, but they may be able to say: for goodness' sake,
 14 don't do this?
 15 A. They would definitely be possible of finding a way.
 16 Q. Now, this is a slightly different question: after
 17 an attack such as that at Fishmongers' Hall, there will
 18 be an investigation by a counter-terrorist team, here
 19 the Operation Bemadam team led by DCI Brown. Is such
 20 a police investigation team given access to all the
 21 intelligence and material held by MI5?
 22 A. So we do share absolutely everything with them. They
 23 don't have access, necessarily, to our full systems, but
 24 through the ELGs, through the JOTs, through regular
 25 communications, through daily, if not hourly meetings in

1 that kind of situation , we would be sharing all the
 2 necessary and relevant information with policing
 3 colleagues.
 4 Q. Next, please, disruptive powers, your paragraph 53.
 5 You've referred to disruptions by police. Is it right
 6 that disruptive powers, to dissuade or prevent SOIs from
 7 engaging in terrorist activity , can also be used by
 8 other government departments in some circumstances?
 9 A. Yes, that's correct.
 10 Q. May disruptive powers be used in particular where
 11 there's insufficient evidence to prosecute, but a need
 12 to try to impede what an SOI is doing?
 13 A. Yes, that's correct.
 14 Q. Is it right that decisions about disruptive action
 15 require careful judgment, because they may antagonise
 16 a subject of interest or, indeed, may make them more
 17 surveillance –aware?
 18 A. Yes, it can have the opposite effect , if you are not
 19 careful.
 20 Q. Now, where intelligence reveals an intent on the part of
 21 an SOI to travel overseas for extremist purposes, are
 22 there various options available to the authorities for
 23 preventing or disrupting travel plans; is this a form of
 24 disruption?
 25 A. Yes, that's right , there are a range of tools available .

1 Q. During the investigation into Khan, as we'll hear, there
 2 were various comments he made that caused concern that
 3 he might want to relocate to Pakistan. Can you say
 4 whether disruptive tools were ever considered in his
 5 case?
 6 A. We didn't get to the stage where we needed to consider
 7 disruptive tools , because he didn't have the means by
 8 which he could actually travel . He was under very
 9 strict licence conditions. He didn't have a travel
 10 document and he likely didn't have the funds to travel
 11 either . So we didn't get to the point at which we
 12 needed to actually disrupt or consider disruptive tools .
 13 Q. Next, please, reviews relevant to the attack, your
 14 pages 16 and following. Is it right that after the
 15 attack, MI5 engaged in a number of reviews?
 16 A. That's correct.
 17 Q. First of all , was there something called a post–attack
 18 review, internal to MI5?
 19 A. Yes, that's right .
 20 Q. What was the purpose of that review?
 21 A. The purpose of the review is to identify what was known
 22 about the attacker prior to the attack, it's to review
 23 all of our assessments, our actions, our decisions made
 24 prior to the attack in relation to the intelligence that
 25 we actually held. It's to identify and review any

1 contextual information that might have had a bearing on
 2 actions and decisions made, and it's to identify any
 3 lessons learned.
 4 Q. Is it right that you weren't personally involved in the
 5 post–attack review, but you're very familiar with its
 6 report and conclusions?
 7 A. That's correct.
 8 Q. And can you confirm that the Inquest team, including me,
 9 have seen the report on that review?
 10 A. Yes.
 11 Q. Who conducted the post–attack review?
 12 A. This was conducted by a review team drawn from
 13 specialists from across MI5 who had had nothing to do
 14 with the original investigation .
 15 Q. Was there cooperation from the sister intelligence
 16 services , SIS and GCHQ?
 17 A. Yes, there was.
 18 Q. And by the Metropolitan Police Service?
 19 A. Yes, that's correct .
 20 Q. Why were the sister intelligence services involved?
 21 A. As a matter of course, we asked them to review their
 22 intelligence holdings to see whether they have any
 23 intelligence that might be helpful to a post–attack
 24 review.
 25 Q. What, in short and simple terms, was the method of

1 review?
 2 A. There were several stages. The first stage was to
 3 identify all of the relevant material; the second stage
 4 was to look at all of the documents analysed by that
 5 search, to check their relevance, and they prepared
 6 a factual narrative of the assessments, actions and
 7 decisions made; and then the third stage was to evaluate
 8 those assessments, decisions and actions taken, plus
 9 looking at all of the contextual information, so our
 10 policies , our processes, to see whether they had been
 11 properly adhered to, and right at the very end,
 12 an expert review panel meeting was convened where they
 13 took stock at various sort of key points in the course
 14 of the investigation to really drill into the detail, to
 15 check their understanding of the decisions that had been
 16 made at the time, and then a final classified report was
 17 produced.
 18 Q. Did those meetings that you have just referred to by the
 19 expert team involve something called "Pause point
 20 meetings" where the team would effectively say: pause
 21 here, was everything done right around this stage?
 22 A. Yes, that's correct .
 23 Q. Your paragraph 62, please. What were the principal
 24 conclusions for the post–attack review?
 25 A. The post–attack review team concluded that MI5 could not

1 have taken any actions or made any decisions which would
 2 have materially changed the outcome of this case.
 3 Furthermore, the conclusion was reached that the
 4 investigative and operational decisions taken by MI5 in
 5 this case were sound.
 6 Q. In addition to the internal post-attack review, which of
 7 course was MI5 policing itself, were there also
 8 independent reviews of MAPPA in the form, first of all,
 9 of a general review carried out by Jonathan Hall QC, the
 10 Independent Reviewer of Terrorism, and a MAPPA serious
 11 case review?
 12 A. Yes, that's correct.
 13 Q. Did your service contribute to both reviews?
 14 A. We did, yes.
 15 Q. May we now turn to the MI5 investigations about
 16 Usman Khan, and your page 18, beginning with the threat
 17 context. First of all, the jury have heard about
 18 something called JTAC; is that the Joint Terrorism
 19 Analysis Centre?
 20 A. Yes.
 21 Q. What is it and what does it do?
 22 A. It's a self-standing organisation comprised of
 23 representatives from 16 government departments, and the
 24 assessments made by JTAC include threat levels for the
 25 whole of the UK and for a number of specific sectors,

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1 such as the government estate or military facilities.
 2 Q. Are those assessments informed by intelligence and
 3 current information about the intelligence and
 4 capacities of terrorist networks and groups?
 5 A. Yes, alongside a range of geo-political factors.
 6 Q. Now, at the time of the attack, was the national threat
 7 level graded as substantial?
 8 A. Yes, that's correct.
 9 Q. What does that mean?
 10 A. That means an attack is a strong possibility.
 11 Q. For most of the time before early November 2019, what
 12 had been the assessment?
 13 A. It had been severe.
 14 Q. Meaning?
 15 A. Meaning an attack is highly likely.
 16 Q. Now, your paragraph 73, is it right that there's
 17 a diverse range of terrorist threats to the UK,
 18 including Islamist terrorism?
 19 A. Yes, that's correct.
 20 Q. What is the most likely form of Islamist terrorism
 21 attack in the view of the Service?
 22 A. The most likely form of attack at the moment is a low
 23 sophistication attack carried out at short notice.
 24 Q. By lone actors or by actors within networks?
 25 A. Most likely by lone actors.

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1 Q. At the time of the Fishmongers' Hall attack,
 2 approximately how many investigations was MI5 running
 3 into individuals or groups linked to Islamist terrorism?
 4 A. We were running around 600 investigations into
 5 individuals and groups.
 6 Q. About how many active SOIs did you have on your radar?
 7 A. Around 3,000.
 8 Q. Was there a larger pool of closed SOIs?
 9 A. Yes, around 40,000.
 10 Q. Now, a colleague of yours in the Westminster Bridge case
 11 in 2018 put that at 20,000, so is it right that that
 12 figure has been growing over the years?
 13 A. Yes, that's correct.
 14 Q. You have been a member of the Service for many years.
 15 How does the scale of investigative work now compare
 16 with the position over the course of your career?
 17 A. It has significantly increased over the course of my
 18 career.
 19 Q. Your paragraph 75, please. Does one aspect of this
 20 threat concern those travelling overseas for extremist
 21 purposes?
 22 A. Yes, that's correct. Around 850 such individuals have
 23 travelled for terrorist-related purposes overseas, with
 24 around half of whom are now thought to have returned to
 25 the UK, which we need to investigate and understand

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1 whether they pose a threat on their return.
 2 Q. Since around 2012, has the casework seen an increase in
 3 high-risk casework?
 4 A. Yes, that's correct.
 5 Q. What does that mean in practical terms?
 6 A. I think it refers to the type of casework involving
 7 individuals who might have received terrorist training,
 8 who had been overseas to fight themselves, so they come
 9 with additional capability, and potentially have the
 10 means to carry out an attack on return.
 11 Q. Does that work dealing with those who have received
 12 training and maybe trying to procure the means to carry
 13 out an attack, involve more intensive investigation,
 14 typically?
 15 A. That's correct.
 16 Q. Some further questions, please, about the threat
 17 context. In his first public address in October of last
 18 year, the current Director General, Mr McCallum,
 19 commented that the task of the Service has:
 20 "... become sharper in recent years, as more
 21 terrorists have gone for basic attack methods requiring
 22 little preparation, meaning ... fewer clues ... and less
 23 time to find [them]."
 24 Obviously that comment finds resonance in the case
 25 of Usman Khan. How has that development affected the

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1 approach of MI5 to assessing risk?
 2 A. It's very much at the heart of our work: we realise that
 3 attacks can be potentially very short notice and it's
 4 part of our training, how we approach investigations,
 5 and very much at the forefront of our minds when we are
 6 setting an investigative strategy and putting the
 7 coverage in place.
 8 Q. Does that mean, in practice, that whereas in the past it
 9 may have been possible to expect clues in the form of
 10 overt attack—planning for sophisticated attacks, now you
 11 often have to deal with individuals who leave no similar
 12 clues?
 13 A. Yes, that's correct.
 14 Q. Is it the experience of the Service that attacks are
 15 more likely to occur at locations where previous attacks
 16 have occurred, copycat attacks geographically?
 17 A. Copycat attacks are possible, but because of the very
 18 small number of successful attacks, it's actually quite
 19 difficult to establish a pattern of whether particular
 20 sites or places are likely to be used by a terrorist in
 21 their targeting thoughts.
 22 Q. However, is it possible to take a view about the
 23 attractiveness of targets to terrorists on other
 24 grounds, for example, their being in a major city, the
 25 centre of a city, close to or at an iconic building, or

1 at an event featuring high profile individuals?
 2 A. I think certainly we assume that a so-called iconic site
 3 would more likely have greater impact for a terrorist if
 4 they were to be successful in conducting an attack
 5 there, but these types of sites also tend to be the most
 6 protected, as it were, and therefore they're not
 7 necessarily the ones that we see terrorists look for in
 8 order to conduct their attacks. There tend also to be
 9 a whole range of personal motivations which vary from
 10 case to case, that might inform where an individual
 11 might choose to target their attack.
 12 Q. Now, a layman in the UK might say that experience tells
 13 us that terrorists tend to target events and sites in
 14 major city centres rather than in smaller or less well
 15 known towns; is that the experience of assessment of the
 16 Service?
 17 A. I think there isn't a clear pattern, actually, of
 18 successful terrorist attacks. There are a variety of
 19 motivations, but I would agree that an iconic location
 20 would have greater resonance for a terrorist.
 21 Q. Next, please, ALM, AI—Muhajiroun, which you address at
 22 paragraph 77. This is an organisation which is banned
 23 and to which Khan was linked in 2008 to 2010. Is it
 24 right that it was formed in the UK in the mid-1990s and
 25 has been a banned organisation since 2006?

1 A. Yes, that's correct.
 2 Q. Is it right that a number of those tried in relation to
 3 serious terrorist plots have been linked authoritatively
 4 to ALM, including a number involved in the fertiliser
 5 bomb plot and the murderers of Lee Rigby?
 6 A. Yes.
 7 Q. Has any change been seen in recent years in the threat
 8 posed by ALM and its members?
 9 A. The activity of the group, the levels of activity has
 10 varied quite significantly with various disruptions that
 11 have taken place over the course of the last sort of
 12 five or ten years or so, and individuals will go in and
 13 out of membership over that time, so it's not
 14 a consistent picture.
 15 Q. However, did the leadership declare allegiance to IS?
 16 A. They did, in 2014.
 17 Q. Did that mark any increase in their threat or concern
 18 about them?
 19 A. I think it was, from our perspective, an increase in the
 20 threat posed by them.
 21 Q. Without being precise, how many people might be linked
 22 to ALM at any one time? Are we speaking of dozens?
 23 Hundreds? Thousands?
 24 A. Hundreds.
 25 Q. Is it right that ALM members, as well as having engaged

1 in attacks themselves, have been known to engage in
 2 support for the planning of attacks?
 3 A. Yes.
 4 Q. And also participating and encouraging travel to fight
 5 for extremist purposes overseas?
 6 A. Yes, but I would stress that the numbers of those
 7 involved in the planning and carrying out of terrorist
 8 attacks are relatively small compared to the numbers
 9 involved in, say, encouraging travel to fight or
 10 fundraising or radicalising others.
 11 Q. Does MI5 regard a person's membership of ALM or past
 12 membership or association as a particular risk factor?
 13 A. I think it's indicative of an extremist mindset. It's
 14 not necessarily indicative of an indication that they
 15 will go on to conduct an attack. This is because we've
 16 also seen intelligence to suggest that some individuals
 17 actually decide to leave ALM because it's not actually
 18 violent or activist enough.
 19 Q. Does the Service regard active membership or involvement
 20 with leadership figures like Anjem Choudary as a risk
 21 factor?
 22 A. It would be of concern, yes.
 23 Q. So against that threat picture, may we turn to the
 24 investigations into Usman Khan, your paragraph 79. When
 25 did Khan first come to the attention of MI5?

1 A. He first came to our attention in 2008.
 2 Q. Did you assess at that time that he was a member of ALM?
 3 A. Yes.
 4 Q. Was he later investigated by MI5, as well as by the
 5 police, in Operation Guava?
 6 A. That's correct.
 7 Q. Was that the investigation we've heard about, into
 8 a network of mainly dual British Bangladeshi nationals
 9 with groups in Stoke, Cardiff and London?
 10 A. That's correct.
 11 Q. As we've heard, did that investigation reveal plots in
 12 late 2010 to attack the London Stock Exchange and other
 13 symbolic targets in London?
 14 A. Yes, that's correct.
 15 Q. Were those plots primarily by the Cardiff and London
 16 groups as distinct from the Stoke group?
 17 A. That's correct.
 18 Q. Was Khan a member of the Stoke group?
 19 A. Yes.
 20 Q. What did the Service assess that group to be involved
 21 with and intending?
 22 A. So we assessed that the intention of that particular
 23 part of the group was to send members to receive
 24 extremist training overseas in the medium term, and then
 25 potentially for them in the longer term to return to the

1 UK where they would conduct an attack.
 2 Q. Now, we have heard about evidence in the trial of
 3 operational meetings of the group, and groups
 4 during November and December 2010, and in that context,
 5 a covert listening device identifying Khan and two
 6 others discussing plans for an attack in a pub with
 7 an IED. Is that information the Service obtained at the
 8 time?
 9 A. Yes, that's correct.
 10 Q. We've also heard about Khan having discussed a pipe bomb
 11 recipe from an Al Qaeda in the Arabian Peninsula
 12 magazine, Inspire; again, did that come to the attention
 13 of the Service?
 14 A. Yes.
 15 Q. Did you assess that those discussions affected long-term
 16 risks posed by Khan, either as a matter of intent or
 17 capability in connection with the IED?
 18 A. Certainly they were the elements that led to him being
 19 charged under the Terrorism Act.
 20 Q. When later the Service came to investigate Khan, was it
 21 fed into the thinking of the team that this was somebody
 22 who had thought about an attack with an IED in the past?
 23 A. Absolutely.
 24 Q. We have heard that following that investigation, Khan
 25 was arrested and convicted of acts preparatory to

1 terrorism. Some questions arising out of that, please.
 2 What assessment did MI5 make of Khan's access to finance
 3 or a network of associates, given that the basis of plea
 4 was that the Stoke plan had established -- the Stoke
 5 group had planned to establish a training facility
 6 overseas?
 7 A. We assessed that he didn't have much access to finance
 8 at that particular time. He was seeking ways and means,
 9 both legal and illegal, to try and raise money as
 10 quickly as he possibly can to leave the country.
 11 Q. When later MI5 received information that Khan had hopes
 12 of relocating to Pakistan, did that previous information
 13 that he had wanted to establish a militant facility
 14 there affect your assessment of risk?
 15 A. It was obviously part of the intelligence picture that
 16 we had at the time, but during the course of the open
 17 investigation, when we heard that he was considering
 18 relocating to Pakistan, we had no intelligence to
 19 suggest that he was looking to relocate for nefarious
 20 purposes at that time and, indeed, at any time during
 21 the open investigation post the Guava conviction.
 22 Q. Now, as I've said, the basis of his plea was simply that
 23 he'd been involved in a plan to establish the training
 24 camp overseas, but did the Guava teams find any
 25 intelligence or evidence linking him more directly to

1 imminent plans to commit attacks on UK soil?
 2 A. So he was certainly in direct conversation with both the
 3 London and the Cardiff subjects of interest who were
 4 directly considering attack--planning. We assessed at
 5 the time that his primary aim, though, was to go
 6 overseas and to set up the madrassa, where we assessed
 7 that he was going to manage terrorist training.
 8 Q. May we move on to the period Khan spent on remand in
 9 prison, between December 2010 and February 2012. Was
 10 an investigation opened by MI5 over this period
 11 following up on Guava for the purpose of supporting the
 12 prosecution?
 13 A. That's correct.
 14 Q. In that context, in early 2011, did MI5 become aware of
 15 Khan engaging in violence in prison?
 16 A. We did, yes.
 17 Q. Did you obtain information around the same time,
 18 suggesting that he may have access to weapons?
 19 A. That's correct.
 20 Q. Were any weapons ever found?
 21 A. No.
 22 Q. Was there also intelligence suggesting that he wanted to
 23 die and go to paradise?
 24 A. There was information to that effect.
 25 Q. In May 2011, was MI5 aware of a search of Khan's cell,

1 revealing documents by the extremist preacher,
 2 Anwar Al-Awlaki?
 3 A. That's correct.
 4 Q. Around that time, what assessment did MI5 make about
 5 Khan's position in the Muslim inmate community?
 6 A. We saw that he was an influential figure within the
 7 extremist Islamist inmate community, where he was
 8 preaching and potentially holding influence over other
 9 prisoners, some degree of radicalisation.
 10 Q. So that's from the very start of his time in prison?
 11 A. That's correct.
 12 Q. Did you obtain intelligence about the kind of people he
 13 was maintaining contact with?
 14 A. We did, yes.
 15 Q. Did that include his co-defendants and extremists
 16 outside prison?
 17 A. That's correct.
 18 Q. Did you also obtain intelligence suggesting that his
 19 interest in relocating to Pakistan was being expressed?
 20 A. Yes.
 21 Q. Now, at this early stage of the investigation, was the
 22 MI5 team aware of Khan's previous brushes with the
 23 police in 2004 and 2009 involving assaults?
 24 A. Yes, we were aware of that.
 25 Q. We'll hear that Khan's involvement in violence in prison

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1 continued, and you had this knowledge of Khan's
 2 involvement in violence in the past. Was it assessed on
 3 this basis: that Khan was somebody who presented a risk
 4 of direct physical violence?
 5 A. Certainly there was intelligence that we were receiving
 6 to suggest that he was violent during this period of
 7 time.
 8 Q. May I now turn to 2012, when Khan was in HMP Wakefield,
 9 then transferred to HMP Belmarsh. Was he, over this
 10 period, assigned his own P4, Priority 4 level
 11 investigation?
 12 A. Yes, that's right, Priority 4, an individual who had
 13 previously posed a serious threat to national security
 14 and we judged that potentially there was a risk of
 15 re-engagement in such terrorist-related activities.
 16 Q. What was the purpose of maintaining such
 17 an investigation while he was in prison?
 18 A. I think it really was to understand whether or not he
 19 was going to seek to continue in those terrorist-related
 20 activities, ie was he going to reach out to people
 21 outside of prison and fundraise, was he going to reach
 22 out to people outside of prison and plan an attack, and
 23 we wanted to understand whether that was going to be the
 24 case or not.
 25 Q. Over this period, 2012, did MI5 understand that Khan

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1 maintained his profile in the prison inmate community
 2 and continued to associate with extremists?
 3 A. Yes, that's correct.
 4 Q. And did you understand that he maintained his desire to
 5 move to Pakistan?
 6 A. Yes, that's correct. He had familial links there.
 7 Q. Now, we know in 2012 that Khan became involved in
 8 an incident of disorder, and that it came to light that
 9 he had an address of a senior member of staff in his
 10 possession, and that he was involved in a demonstration
 11 in the prison. Was that information that came to MI5 at
 12 the time?
 13 A. We were made aware contemporaneously of the incident
 14 where he held an address of a senior member of staff.
 15 The information about a demonstration came to us
 16 a little bit later in the investigation.
 17 Q. Was that in November 2014?
 18 A. That's correct.
 19 Q. And did you discover the detail of that investigation,
 20 that he'd jumped on the netting and recited a poem
 21 including the words "Cut off the kuffar's head"?
 22 A. That's right.
 23 Q. Did you at the same time become aware of information
 24 we've heard that Khan had been attempting to dig through
 25 his cell wall?

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1 A. Yes.
 2 Q. How did these incidents bear on the assessed risk that
 3 Khan posed?
 4 A. I think for us it confirmed that he still maintained
 5 an extremist mindset, and that there was still
 6 a propensity towards violence.
 7 Q. Also in November 2014, did MI5 become aware of
 8 information we've heard that Khan had been breaking up
 9 a radio, such that the exposed wires could have been
 10 used as a charger?
 11 A. Yes, that's correct.
 12 Q. And did that raise concerns that he retained an interest
 13 in constructing a device of some kind?
 14 A. I think no, not directly. There was an assessment by
 15 the prison authorities, a plausible explanation that it
 16 could have been used as a charger for other items, and
 17 we accepted that explanation at the time.
 18 Q. Looking at your paragraph 91, during this period in
 19 2012, what intelligence did MI5 receive about Khan's
 20 associations and intended associations?
 21 A. So he continued to interact with other TACT offenders,
 22 including in Belmarsh, where he attempted to get moved
 23 to a special unit where apparently he could be closer to
 24 Abu Hamza and Abu Qatada.
 25 Q. Next, 2013, your paragraphs 92 to 93. In early 2013,

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1 Khan was transferred to HMP Long Lartin. In March 2013,
 2 was there an MI5 quarterly case review?
 3 A. Yes, that's correct.
 4 Q. What assessment was made at that time and why?
 5 A. We judged that it was likely that Khan would re-engage
 6 in Islamic extremist activity. I think we hadn't seen
 7 anything in his behaviour yet to give us assurance that
 8 he wasn't going to turn away from those types of
 9 activities: it was still fairly early on into his
 10 sentence, in fact he was still waiting for the outcome
 11 of his appeal at that stage.
 12 Q. Did the MI5 team form any view about the type of
 13 extremist activity he might be engaged in and when, in
 14 prison or in the community?
 15 A. We didn't form a view as to timescale. We did think
 16 that those types of activities could include
 17 fundraising, it could include support for others
 18 intending to travel overseas for terrorist-related
 19 purposes, it could potentially include attack-planning.
 20 Q. Later in spring 2013, did MI5 become aware of
 21 intelligence we've heard about concerning a search of
 22 Khan's cell where various items, including bottles
 23 filled with liquids, were obtained?
 24 A. That's correct.
 25 Q. We've heard that during that search, anhydrol forte was

1 found, containing chemicals which can be used in an IED.
 2 Did that come to MI5's attention?
 3 A. Yes, it did.
 4 Q. Was there any assessment of that intelligence?
 5 A. There is, unfortunately, no record of an MI5 assessment
 6 of this intelligence, although that doesn't necessarily
 7 mean that an assessment didn't take place.
 8 Q. Should there have been an assessment of intelligence of
 9 this kind?
 10 A. I think there would have been an assessment of
 11 intelligence of this kind. Although there was
 12 a plausible explanation for the possession of the
 13 anhydrol forte, which had been prescribed for Khan by
 14 Healthcare. There was a possible explanation for the
 15 bottles of liquid that were found, believed to be
 16 washing-up liquid and shampoo. It's worth highlighting
 17 that together those items would not have been able to be
 18 used within a prison environment to form an IED.
 19 Q. Nevertheless, did this make MI5 consider that there was
 20 a possibility that Khan retained an interest in an IED
 21 as demonstrated by his reading of the Inspire recipe?
 22 A. I haven't got a record of an assessment made at that
 23 particular time.
 24 Q. In July 2013, Khan was moved to HMP Frankland, and later
 25 that year, he was involved in a fight within the prison.

1 Was that discovered at the time?
 2 A. We became aware of this in early 2014.
 3 Q. Your paragraph 95, what was the overall intelligence
 4 picture of Khan at this time? So late 2013?
 5 A. So I think at this time we assessed that Khan continued
 6 to hold an extremist mindset. He was seen as a senior
 7 figure within the extremist Islamist community in the
 8 prison, and that he may have been having a radicalising
 9 influence on other prisoners.
 10 Q. Moving, then, to 2014. In January 2014, Khan
 11 transferred to HMP Manchester. Was there a quarterly
 12 case review by MI5 in March of that year?
 13 A. Yes, there was.
 14 Q. What was the objective and conclusion of that review?
 15 A. The objective of the investigation remained the same,
 16 and that was to ensure that indicators in re-engagement
 17 in extremism by Khan could be identified.
 18 Q. Was any view taken about whether he posed a threat to
 19 national security where he was?
 20 A. So although we definitely had intelligence that he was
 21 displaying an extremist mindset, there was no suggestion
 22 at the time of this quarterly case review that he was
 23 posing a threat to national security while in prison.
 24 Q. Presumably that took into account the restraints on him
 25 physically in prison?

1 A. That's correct. Prison is a very controlled
 2 environment?
 3 Q. Especially for a category A high risk prisoner?
 4 A. Correct.
 5 Q. In August 2014, Khan moved to HMP Woodhill. Later in
 6 2014, did MI5 receive further intelligence suggesting
 7 that Khan retained his desire to move to Pakistan?
 8 A. That's correct.
 9 Q. This, I think, a regular theme of his time in prison?
 10 A. Yes.
 11 Q. In October 2014, did MI5 become aware of Khan's
 12 potential involvement in a plot by another prisoner to
 13 kill a prison psychologist?
 14 A. Yes, that's correct.
 15 Q. At a further quarterly case review in December 2014,
 16 what was considered and decided?
 17 A. So we needed to understand whether or not Khan was
 18 involved in that attack plot on a prison psychologist,
 19 and it was also recorded at that time that it still
 20 remained likely that Khan would seek to re-engage in
 21 Islamist extremist activity.
 22 Q. Throughout 2014 generally, had Khan maintained
 23 an interest to move to Pakistan?
 24 A. That's correct.
 25 Q. And had he continued to associate with his co-defendants

1 while in prison?
 2 A. Yes.
 3 Q. What was the basis of the assessment that he was likely
 4 to re-engage in extremist activity?
 5 A. I think it was still that he -- he had moved to several
 6 different prisons where he was engaging with different
 7 groups of extremist prisoners, and we were not entirely
 8 confident at that stage of his -- whether he would
 9 continue to -- or whether he would re-engage in
 10 extremist-related activities at that stage, so we
 11 assessed that it was still likely that he would.
 12 Q. Likely that he would do so while in prison or likely
 13 that he would do so on release?
 14 A. Likely that he would do so while he was in prison.
 15 Q. Moving on to 2015, your paragraph 102. Was a decision
 16 made in February 2015 about the investigation into Khan?
 17 A. Yes, it was decided that we would close the
 18 investigation into Khan at that stage.
 19 Q. What was the reasoning behind that decision?
 20 A. We'd been investigating him at that stage for the past
 21 four years, having been in prison for that period of
 22 time, and we'd also assessed that he wasn't involved in
 23 the plot to kill the prison psychologist, and over the
 24 course of that period of four years, we had received no
 25 intelligence to suggest that he was engaging in

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1 activities of national security concern, so whilst, yes,
 2 we'd seen indications that he still maintained
 3 an extremist mindset, and a propensity towards violence,
 4 we didn't see him engaging in the sorts of activities
 5 that I mentioned before, like fundraising, like
 6 attack-planning.
 7 Q. In that context, considering activities of national
 8 security concern, was your assessment of the involvement
 9 in the plot to kill the prison psychologist particularly
 10 important, because that would, of course, have been
 11 planning an attack?
 12 A. Yes, that was important.
 13 Q. What was the practical effect of the decision to close
 14 the investigation?
 15 A. The practical effect of closing the investigation was
 16 that we no longer sought to proactively gain
 17 intelligence on Khan. It didn't mean that we didn't get
 18 intelligence on him: we still continued to receive
 19 a steady stream of information about him even though the
 20 investigation was closed, but we no longer proactively
 21 tasked for information.
 22 Q. When that steady stream of intelligence was coming in,
 23 was it being considered and assessed, or simply put into
 24 an information bank?
 25 A. It was continuously being assessed. It was being looked

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1 at using the information-handling model that we talked
 2 about earlier, which looks at the risk, the
 3 actionability, the credibility and the proportionality
 4 of each piece of information that comes in. This
 5 enables you to make an assessment as to whether
 6 an investigation needs to be re-opened or not.
 7 Q. What's the threshold for that decision to re-open the
 8 investigation?
 9 A. I think there's no exact threshold, it really depends on
 10 the piece of information at the particular time.
 11 Q. In February 2015, when the decision was made to close
 12 the investigation, what was the assessment of the
 13 prospect of Khan re-engaging in extremism?
 14 A. At that stage it was assessed that the residual risk of
 15 Khan re-engaging in extremist activity was low.
 16 Q. Now this was a change from likely in 2014; correct?
 17 A. Correct.
 18 Q. What had changed and were you confident in this change?
 19 A. So I think what had changed was that we had investigated
 20 him by the time we got to February 2015 for some four
 21 and a half years, and we had not seen any activities of
 22 national security concern. So we felt that it was the
 23 right time to close the investigation. We hadn't seen
 24 him being involved in the plot to kill the prison
 25 psychologist, and we can't investigate people forever,

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1 we have to make a decision at what point we have to
 2 close an investigation, and if there is no intelligence
 3 to suggest that somebody is engaging in national
 4 security activities of concern, then we can close
 5 an investigation.
 6 Q. Looking back from the perspective of somebody who wasn't
 7 directly involved but has seen all the papers and
 8 considered the investigation with the team, do you
 9 consider that the closure decision was appropriate?
 10 A. I do consider it was appropriate.
 11 Q. And why is that?
 12 A. Excuse me a minute. A frog in my throat; apologies.
 13 I do consider it was appropriate because we had
 14 carried out quite a significant period of investigation
 15 while he was in prison. We had received a steady stream
 16 of reporting which gave us intelligence about his
 17 activities while he was in prison, and we saw no
 18 activities of national security concern over the course
 19 of that time, therefore it was the right decision, in my
 20 view, to close the investigation at that time.
 21 Q. Did it remain closed until 8 August 2018?
 22 A. That's correct.
 23 MR HOUGH: Sir, would that be a convenient moment for our
 24 mid-morning break?
 25 JUDGE LUCRAFT: I think we've been going for just under

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1 an hour and a half, Mr Hough, so we will break there and
 2 have a 15-minute break.
 3 MR HOUGH: I think the procedure is that the jury will
 4 leave.
 5 JUDGE LUCRAFT: Yes.
 6 MR HOUGH: The lawyers will stay in the room to allow
 7 Witness A to leave if she wishes.
 8 JUDGE LUCRAFT: Thank you very much.
 9 (In the absence of the jury)
 10 I'll rise.
 11 (11.05 am)
 12 (A short break)
 13 (11.21 am)
 14 (In the presence of the jury)
 15 JUDGE LUCRAFT: Mr Hough.
 16 MR HOUGH: Witness A, we had reached the point
 17 in February 2015 where the investigation into Khan was
 18 closed. We're at your paragraph 103. During the
 19 remaining months of 2015, did MI5 continue to receive
 20 intelligence suggesting that Khan was still exercising
 21 influence among Muslim extremists in the prison?
 22 A. Yes, that's correct.
 23 Q. Did the themes of contact with co-defendants and
 24 terrorist offenders also continue over that period?
 25 A. Yes.

1 Q. And also the theme of Khan wishing to move to Pakistan.
 2 A. Yes, that's correct.
 3 Q. During 2016, while the investigation remained closed,
 4 did intelligence continue to flow in suggesting that
 5 Khan remained influential among Islamist extremists?
 6 A. Yes.
 7 Q. And at this time that he may have been involved in
 8 inciting others to violence?
 9 A. Yes.
 10 Q. Was any view taken about whether he had become more or
 11 less extreme since entering prison?
 12 A. I think there was a suggestion -- well, certainly we
 13 assessed that he continued to hold an extremist mindset.
 14 We received some reporting which suggested that perhaps
 15 he had become more extreme, but there was a whole range
 16 of reporting, a whole spectrum, if you like, and I think
 17 that was one moment in time.
 18 Q. Did the themes of him associating with co-defendants and
 19 terrorist offenders and intending to relocate to
 20 Pakistan also continue to feature in the intelligence
 21 over this time?
 22 A. It did, yes.
 23 Q. Next, to January to December 2017, did intelligence
 24 continue to come in over that period confirming that his
 25 radicalising influence continued and that his

1 associations with terrorist offenders continued?
 2 A. Yes, that's correct.
 3 Q. And the final period before reopening of the
 4 investigation, January to August 2018, was the continued
 5 intelligence suggesting association with terrorist
 6 offenders?
 7 A. That's correct, yes.
 8 Q. Now, we have received evidence of considerable prison
 9 intelligence between, in that period from February 2015
 10 to August 2018, including intelligence that Khan was
 11 a senior figure in the various wings he inhabited among
 12 the Muslim offender population, and that he was at times
 13 involved in violence or inciting violence. Did that
 14 information in general terms come through to MI5?
 15 A. In general terms, yes.
 16 Q. We have seen intelligence that that theme continued
 17 during 2018. So, for instance, in January 2018, Khan
 18 being reported as the emir on C wing; in June 2018, Khan
 19 being identified as one of a group with links to
 20 religious bullying and the gang culture; and July 2018,
 21 Khan and another being overheard apparently discussing
 22 potential revenge on a "snitch".
 23 Was that consistent with the intelligence picture
 24 and understanding of MI5 in those latter months before
 25 the investigation was re-opened?

1 A. It was consistent with the picture that we had of him.
 2 We didn't make a formal assessment at that time because
 3 the investigation was closed, but certainly I would say
 4 it was consistent with the picture that we had, and not
 5 particularly unusual for any TACT offender who would
 6 usually group together in a prison-type situation.
 7 Q. Now, some others who dealt with him in the prison, such
 8 as his offender supervisor and the offender manager,
 9 detected an improvement in Khan's reported behaviour in
 10 prison between late 2017 and late 2018.
 11 Was that a view which came through to the MI5
 12 investigation team?
 13 A. I can't comment on the detail of the information that we
 14 received from our Prison Service colleagues. We
 15 received a variety of reporting over the course of that
 16 time. I would say the overriding summary was that he
 17 retained an extremist mindset.
 18 Q. In general terms, can you say this: was the perspective
 19 of MI5 that this was somebody who remained a concerning
 20 extremist, or was your perspective that of some others
 21 who have given evidence; that he had shown real strides
 22 towards change of mindset?
 23 A. Our perspective was that he was a convicted TACT
 24 offender and, as such, on his release we would need to
 25 open an investigation to manage the potential risk to

1 national security .
 2 Q. During the period when the investigation was closed, was
 3 consideration given at any time to reopening it?
 4 A. No, it was not.
 5 Q. With the benefit of the post-attack investigation, were
 6 any intelligence –gathering opportunities lost due to the
 7 closure of the investigation ?
 8 A. It 's very difficult to comment on that one because
 9 I don't know what information we would have received had
 10 we been proactively investigating during the course of
 11 that time. It 's almost impossible to speculate on which
 12 way an investigation may have taken. All I can say is ,
 13 on the basis of the information that we did receive ,
 14 none of those pieces culminated in a requirement --
 15 meeting a threshold, if you like , to re-open the
 16 investigation over the course of that period.
 17 Q. This may be a difficult question to answer, but what
 18 sort of activity on Khan's part would have triggered the
 19 reopening of the investigation ?
 20 A. It is in the realms of speculation, but it could, for
 21 example, have been him reaching out to individuals
 22 outside a prison and attempting to fundraise for
 23 terrorist –related purposes.
 24 Q. Turning, then, to the reopening of the investigation ,
 25 your paragraph 107. That took place in August of 2018.

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1 What was the reason?
 2 A. We re-opened the investigation in anticipation of his
 3 forthcoming release.
 4 Q. By that stage, it would have been known to the team that
 5 Khan was to be released directly from the high security
 6 estate as a category A high-risk prisoner. We've heard
 7 that that's very unusual, even among terrorist
 8 offenders. Was that a reason for concern for the MI5
 9 team?
 10 A. I think our primary concern was that he was a TACT
 11 offender. It was less about what type of prison he
 12 would be released from, it was the fact that he was
 13 a TACT offender and he would be being released from
 14 a very controlled environment into a much less
 15 controlled environment.
 16 Q. We've heard that for many offenders there is a progress
 17 through their time in prison in which they go down the
 18 categories and therefore are assessed at least by the
 19 prison authorities as posing less risk . That didn't
 20 happen with Khan. Wasn't that a reason for concern for
 21 the team?
 22 A. So I can't comment on the detail of the assessments that
 23 we may or may not have received from the Prison Service
 24 authorities , unfortunately. We remained concerned that
 25 he was a convicted TACT offender and we needed to open

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1 an investigation to manage his release.
 2 Q. Was there any other trigger for the reopening of the
 3 investigation , or any other reason for it , other than
 4 his release being imminent?
 5 A. No, there was not.
 6 Q. Was the practical effect of the investigation being
 7 re-opened, as you have said, that from this point,
 8 proactive investigation work would be done?
 9 A. That's correct. We would work with our police
 10 colleagues to identify the aims of the investigation ,
 11 the risks that we thought that Khan might pose, and to
 12 put in place the right kind of coverage, a proportionate
 13 amount of coverage to manage those risks and to meet
 14 those aims of the investigation .
 15 Q. What priority rating was Khan and the investigation
 16 given at first ?
 17 A. It was given a Priority 4.
 18 Q. What was the reason for that rating rather than any
 19 higher rating?
 20 A. This was because it was to gain a better understanding
 21 and manage the potential threat from him. We hadn't
 22 seen any intelligence to indicate activities of national
 23 security concern during his time in prison , therefore he
 24 met the Priority 4 criteria .
 25 Q. Based on your answer, do you consider that was a correct

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1 rating to give?
 2 A. I do, yes.
 3 Q. Your paragraph 108. Was there a quarterly review by MI5
 4 of the investigation in September 2018?
 5 A. Yes, there was.
 6 Q. Did that validate the decision to set the case as
 7 a Priority 4 investigation ?
 8 A. It did, yes.
 9 Q. What specific risks were identified in connection with
 10 Khan at that review?
 11 A. So he was still in prison at that time, so one key risk
 12 was that he might seek to radicalise individuals in
 13 prison, and second, that he may seek to re-engage in
 14 extremist-related activity on release .
 15 Q. Was a view taken about what form of extremist activity
 16 he might re-engage in?
 17 A. I think we were open minded as to what form that might
 18 take, from fundraising, to attack-planning, to seeking
 19 to travel overseas for terrorist –related purposes.
 20 Q. Was any view taken about the level of that risk?
 21 A. I think that we categorised it as "may seek to re-engage
 22 in extremist activity upon release". There isn't
 23 an exact science for this risk determination, but we
 24 thought he may.
 25 Q. Might you assess, for example, with another SOI, that

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1 they were likely or very likely to?

2 A. I think it would very much depend on the intelligence

3 that we had in front of us at that time. So with Khan

4 we hadn't seen any sort of run-up which indicated he had

5 been engaging in activities of national security

6 concern. At that point we had looked at all the prison

7 intelligence, and whilst we were concerned that he

8 maintained an extremist mindset, we hadn't seen anything

9 to illustrate that he was taking it beyond a mindset, if

10 you like, into actual activity, or planning.

11 Q. Next your paragraph 109. May we put that on the screen,

12 please {WS5052/26}. If we just focus on it so it can be

13 seen, your witness statement says this:

14 "During this period [so late 2018] Khan continued to

15 associate with TACT offenders. Information received

16 in November 2018 suggested that Khan was continuing in

17 his attempt to radicalise other Muslim prisoners and he

18 intended to re-engage in terrorism-related activities

19 when he was released, including carrying out an attack.

20 This information was of unknown validity and

21 uncorroborated."

22 How many strands of intelligence does this, in fact,

23 reflect?

24 A. There were in fact two strands of intelligence: one

25 suggesting that Khan was intending to return to his old

1 ways, believed to be terrorism, and a second strand

2 which suggested that he intended to conduct an attack on

3 release.

4 Q. Now, in his case, returning to old ways might not mean

5 involvement in immediate attack—planning because, of

6 course, he was convicted of seeking to set up a facility

7 overseas?

8 A. That's correct.

9 Q. Taking those strands in turn, first of all, the

10 "old ways" strand, if I can put it in those terms. What

11 was the validity and corroboration of that strand?

12 A. It remained uncorroborated and it was of unknown

13 validity.

14 Q. You have said that was only one strand. Was there any

15 period when it was considered to be more than one

16 strand?

17 A. There was a short period of time where we received

18 another piece of very similar intelligence which talked,

19 again, about old ways, returning to old ways. We

20 realised fairly soon after we had done a little bit of

21 work that it was, in fact, a duplicative bit of

22 intelligence, the same intelligence, so it did not, in

23 fact, corroborate the first piece.

24 Q. Are you able to be more specific about the period for

25 which that thought of corroboration was present, for

1 example, whether it had passed by the end of 2018?

2 A. I think that by the end of 2018, we were fairly sure

3 that it was a duplicative piece of information.

4 Q. So that there was one source or strand for the

5 intelligence?

6 A. One strand of intelligence relating to old ways.

7 Q. Now, the second strand you've identified, that Khan said

8 he aspired to carry out an attack when released, what

9 was the validity and corroboration of that?

10 A. It was also of unknown validity and it was

11 uncorroborated.

12 Q. What does "unknown validity" mean in this context?

13 A. It means that we don't know whether we can trust it or

14 whether we can distrust it.

15 Q. What would you say to the suggestion that there is some

16 degree of corroboration between the two pieces of

17 intelligence, in that both suggest that Khan has been

18 speaking about re-engaging in some form of terrorism on

19 his release?

20 A. I think we would regard them as quite separate pieces of

21 information and not necessarily corroborating each

22 other.

23 Q. Didn't they, though, corroborate each other to the

24 extent that Khan was speaking to others and declaring

25 an intention to commit illegal acts after he was

1 released?

2 A. I can't comment in detail about the origins of the

3 intelligence without risk to national security. It was

4 quite clear to us that they were quite different pieces

5 of information.

6 Q. Thank you. Are you able to say what level of

7 credibility was attached to each piece of intelligence

8 or their constituent elements, based on the broader

9 intelligence picture?

10 A. Both pieces were of unknown validity, I think that's

11 what I would say about credibility. We didn't know

12 whether we could trust them, we didn't know whether we

13 could distrust them.

14 Q. Now, DCI Ryan Chambers, who we'll hear was the

15 counter-terrorist SIO, in his statement describes the

16 intelligence as corroborated, but in his major incident

17 policy document as uncorroborated. Are you able to say

18 how the intelligence would have been first described to

19 him and other police colleagues?

20 A. I think this may be the distinction that I was referring

21 to before. So with the "old ways" intelligence, we

22 received it twice, in effect, but I think that between

23 the two times that we received it, we had a conversation

24 with the police whereby we may have assessed at that

25 time that it had been corroborated, but in fact when we

1 realised the "old ways" intelligence was a duplication,
 2 that changed its status to uncorroborated.
 3 Q. May we now have on screen, please, {DC6503/2242}. Now,
 4 we see here -- thank you very much -- an entry from
 5 Khan's Mercury Intelligence record, dated
 6 29 October 2018, from Whitemoor, and at the bottom of
 7 the page, please, we see that this was intelligence
 8 recorded that:
 9 "Khan has said that he will return to his old ways,
 10 believed to be related to Terrorism when he is released
 11 next year."
 12 Are you able to say, is this the same intelligence
 13 as the first strand you're referencing, or is it
 14 a separate strand which might have corroborated that?
 15 A. It's the same.
 16 Q. Thank you very much. We can take that off screen now.
 17 What steps, if any, did MI5 take to assess the
 18 validity of either of these strands of intelligence?
 19 A. So we did take steps. I am afraid -- I have looked to
 20 see whether there's anything else I can add as to what
 21 exactly we did, but I'm unable to do that, but we did
 22 take steps to try and validate and corroborate both
 23 pieces of intelligence, but unfortunately, we were
 24 unable to do that for either strand.
 25 Q. Can you say whether those steps were only taken in the

1 immediate aftermath of receiving the intelligence, or
 2 also later during the investigation?
 3 A. The main steps were taken in the immediate aftermath of
 4 receiving the intelligence, but they remained at the
 5 forefront of our mind in the quarterly review process
 6 throughout the course of the investigation over the next
 7 11 months or so.
 8 Q. Did MI5 take any view, either based on the intelligence
 9 itself or the broader picture, as to the potential
 10 timescale for a potential attack?
 11 A. There was no indication at all of timescale.
 12 Q. With which agencies did MI5 share each strand of
 13 intelligence? First of all, the "old ways"
 14 intelligence.
 15 A. We shared it with our counter-terrorism policing
 16 colleagues.
 17 Q. Secondly, the attack aspiration intelligence?
 18 A. The same.
 19 Q. With the benefit of the post-attack investigation, do
 20 you consider that any more could have been done to carry
 21 out further investigations prompted by this
 22 intelligence?
 23 A. I don't believe so. We took all the steps that we could
 24 to try and validate and corroborate both strands of
 25 intelligence, and we were unable to do so.

1 Q. After Khan's release from prison, as we'll see, some
 2 further intelligence was received by MI5 that before
 3 release, Khan had remained a radicalising figure in
 4 prison. That intelligence therefore supported one part
 5 of the intelligence we've seen that referred to old
 6 ways, because that intelligence referred to
 7 radicalisation as well as old ways. Did that make you
 8 think -- MI5 think -- that the other part of the
 9 intelligence might also be corroborated?
 10 A. No, it did not. I think you have to bear in mind the
 11 context of which this kind of intelligence and
 12 information emerges from a prison environment where TACT
 13 prisoners are far more likely to boast about aspirations
 14 of extremist nature than they are to boast about how
 15 rehabilitated they may or may not have become, and this
 16 was the context in which we viewed that intelligence.
 17 It didn't mean that we didn't take it seriously.
 18 Q. So is this right: even if the intelligence was entirely
 19 accurate and Khan was saying these things, it may have
 20 been that he was saying these things among other
 21 extremist offenders to whom he would hardly say that he
 22 intended to become a valuable member of society?
 23 A. That's correct, and I think I would also add that
 24 there's a world of difference between an aspiration and
 25 actually starting to actually do the planning and the

1 type of activity that would be required.
 2 Q. Nevertheless, though, concerning intelligence from the
 3 perspective of your investigators with their experience?
 4 A. Absolutely.
 5 Q. Then may we have on screen {DC6422/5}. This is
 6 a section from a MAPP A F information-sharing form
 7 provided to the participants in a MAPP A meeting
 8 for December 2018. This emanated from the
 9 counter-terrorism and security departments of the
 10 prison, and was provided by them to the offender
 11 supervisor who completed this form; do you understand?
 12 A. Yes.
 13 Q. If we look a little down the page, so we can see the
 14 full entry under "Security information", thank you. Do
 15 we see that the last part of that contains the "old
 16 ways" information?
 17 A. Yes.
 18 Q. Now, there is an entry at the bottom saying:
 19 "Please note this is low graded [information]."
 20 Were you aware, was MI5 aware, that that grading had
 21 been given in this MAPP A F form?
 22 A. Not until after the attack. We're not party to MAPP A
 23 papers or minutes, and we only saw them after the attack
 24 took place.
 25 Q. In the view of MI5, would that have been an accurate

1 description of that intelligence ?
 2 A. I think it would be along the same lines of our grading
 3 of intelligence being of unknown validity.
 4 Q. Do you see, though, that there is a difference between
 5 your description of the intelligence as unknown validity
 6 and not corroborated, and the meaning that these words
 7 would convey to a layman, which might suggest that the
 8 intelligence was positively unreliable?
 9 A. I can't really comment on the grading apportioned to
 10 this, because it was not MI5's grading.
 11 Q. If MI5 had become aware that this was the description
 12 given to that intelligence in the MAPPA process, would
 13 you not, as a service, have wanted to replace this
 14 description because of its propensity to mislead?
 15 A. I think it would depend on the type of conversation that
 16 was actually held at the MAPPA meeting. I am afraid
 17 I'm not able to confirm which meetings we were at and
 18 which we were not at, but our CT policing colleagues
 19 would be regular attendees where this kind of
 20 intelligence was discussed, and they would be able to
 21 provide that colour, if you like, to the description if
 22 there was any cause for concern.
 23 Q. Now, we can see that that intelligence was fed into the
 24 MAPPA process, but the separate intelligence, that Khan
 25 aspired to carry out an attack, or rather had said so,

1 was not fed into the MAPPA process. Was that something
 2 that MI5 knew?
 3 A. We did not know that.
 4 Q. Would you have approved of that decision, namely to feed
 5 in the "old ways" intelligence but not the attack
 6 aspiration intelligence ?
 7 A. So I don't think I can really comment on what
 8 intelligence was fed in to a process that we were not
 9 formally part of. I think it was for our policing
 10 colleagues to decide what was appropriate to share at
 11 that time.
 12 Q. If you had been asked, if MI5 had been asked, would they
 13 have approved providing this intelligence and not the
 14 other piece?
 15 A. We would have given agreement to both pieces of
 16 information being provided.
 17 Q. Now, can you see that from the perspective of laymen
 18 without security information in the MAPPA process being
 19 told about one low graded piece of intelligence, the
 20 "old ways" intelligence, and not being told that there
 21 are two pieces of intelligence, "old ways" and attack
 22 aspiration, neither of which is known to be unreliable,
 23 that there's a big difference between those situations?
 24 A. So I can see the potential for a difference to emerge,
 25 but I do note from having reviewed the MAPPA minutes for

1 that December meeting where this was discussed that they
 2 did acknowledge the potential risks of Khan as a TACT
 3 offender, that he may need to be under potential
 4 investigation and with a high degree of vigilance on his
 5 return to the community. So from my reading of those
 6 minutes, at least, it looked like there was a fairly
 7 good understanding of the potential risk he posed.
 8 Q. But can you not see that the additional information
 9 would have had the propensity to make people like the
 10 offender manager and the overt management police
 11 officers, PS Forsyth and colleagues, more guarded in
 12 their dealings with Khan?
 13 A. I can't comment on that.
 14 Q. May we move on from that, take that document off screen.
 15 Paragraph 110 in your witness statement. On
 16 22 November 2018, did MI5 notify both the West Midlands
 17 Counter-Terrorism Unit and Staffordshire Special Branch
 18 team of the reopening of the investigation and its P4
 19 designation?
 20 A. Yes, we did.
 21 Q. What further information was provided to the police
 22 teams at that point?
 23 A. We noted that the investigation had been closed back
 24 in February 2015, because he had shown no signs of
 25 undertaking activities of national security concern at

1 that time.
 2 Q. And you've told us that you also provided the police
 3 teams with both the "old ways" intelligence and the
 4 attack aspiration intelligence ?
 5 A. That's correct.
 6 Q. Did you also tell them that each piece was of unknown
 7 validity and uncorroborated?
 8 A. Yes.
 9 Q. At that stage, did MI5 expect the police forces to take
 10 any particular action as a result of that information?
 11 A. So we were working with them jointly to see whether it
 12 was possible to validate and corroborate those two
 13 pieces of intelligence. The next stages were to plan
 14 for Khan's release, and to decide what investigative
 15 steps we needed to take, including what proportionate
 16 coverage we might put in place on release.
 17 Q. May we put on screen, please, {DC7478/5}. Now, this is
 18 the day book of DI Ryan Chambers from 28 November 2018,
 19 a JOT meeting that we will be looking at shortly. If we
 20 go down to about six entries down, this transcript of
 21 the day book states:
 22 "Recent prison intel -- intending return to old ways
 23 and will conduct attack on release. Low credibility."
 24 We'll obviously ask Mr Chambers about this, but
 25 would it have been an imprecise description, at least,

1 to describe the intelligence as being of low
 2 credibility ?
 3 A. I don't believe so, no.
 4 Q. Well, can you see that there's a distinction between
 5 something being of unknown validity and uncorroborated
 6 on the one hand, and positively being of low credibility
 7 on the other?
 8 A. I don't think there is a huge distinction, actually,
 9 I think the two are fairly similar. Where you don't
 10 know whether something is credible or not, you don't
 11 know whether you can trust it or not. You can neither
 12 trust it nor distrust it, therefore it remains of
 13 unknown validity.
 14 I know it is quite complicated, but in
 15 an intelligence professional world, the two definitions
 16 are not too far apart from each other.
 17 Q. At this stage, did MI5 give the police teams a current
 18 assessment of the likelihood of Khan re-engaging in
 19 extremist activity?
 20 A. We did. We said that we thought there was a risk that
 21 he may re-engage in terrorist-related activity.
 22 Q. We can take that document off screen at the moment.
 23 Was DCI Chambers from the start the senior
 24 investigator on the police side?
 25 A. That's correct.

1 Q. There are, in effect, three teams involved in the joint
 2 investigation, as I understand it: the MI5 team, the
 3 Staffordshire Special Branch team, including DI Hessel
 4 and DS Stephenson, and the West Midlands Police CTU team
 5 including DI, then DCI, Chambers. What were the
 6 respective roles of those three teams?
 7 A. So MI5 was the lead body for the investigation. We
 8 worked closely with our West Midlands CTU colleagues,
 9 who had the senior investigating officer,
 10 DCI Ryan Chambers, and with Staffordshire Special
 11 Branch, who supported the investigation, because Khan
 12 was based in Stafford.
 13 Q. What was the distinction in responsibilities, as you
 14 understood it, between the Staffordshire team and the
 15 West Midlands CTU team?
 16 A. The West Midlands CTU team would have been the senior
 17 police team responsible for the investigation on their
 18 side.
 19 Q. Did you understand it that the Staffordshire team would
 20 be receiving information directly from the Prevent
 21 officers involved in managing Khan?
 22 A. Yes.
 23 Q. During the investigation, was information shared between
 24 MI5 and the police teams in the way you've described in
 25 general terms: emails, phone calls, regular contact?

1 A. Yes, on a very regular basis.
 2 Q. Was that regular contact with both the Staffordshire
 3 team and the West Midlands team?
 4 A. That's correct, yes.
 5 Q. Your paragraph 111. On 28 November, did MI5 host
 6 a joint operation team meeting with the two police
 7 teams, attended by Mr Chambers, Mr Hessel and
 8 Mr Stephenson?
 9 A. Yes.
 10 Q. Was an intelligence update provided by MI5 at that
 11 meeting?
 12 A. It was, yes, that's the normal thing we do.
 13 Q. What principal risks were identified by the MI5 team?
 14 A. Well, the key risks were that firstly he may become
 15 involved in attack—planning on release; second, that he
 16 might seek to re-engage in other Islamist extremist
 17 activity, that could include the radicalisation or
 18 incitement of others; there was also a potential risk
 19 that he may attempt to abscond, but we assessed that to
 20 be relatively low.
 21 Q. What had led to this JOT meeting being arranged?
 22 A. It was in preparation for his release.
 23 Q. Was any decision made about further investigation into
 24 him?
 25 A. So the purpose of the meeting was to set the

1 investigative strategy and to agree the coverage that
 2 needed to be put in place. This was further discussed
 3 at the second JOT in December.
 4 Q. Are you able to say what threat level was attached to
 5 Khan to which the coverage was to be proportionate or
 6 appropriate?
 7 A. So we don't set threat levels for individual subjects of
 8 interest; we have a priority level for an investigation,
 9 and at the time of that JOT, it was a Priority 4.
 10 Q. Were any decisions at that point taken that you can say
 11 about the type and level of coverage?
 12 A. I've looked really carefully to see whether there is
 13 anything further that we can say about the types of
 14 coverage. You covered the types of coverage we might
 15 typically put in an investigation at the beginning of me
 16 giving evidence. I am afraid I can't say anything
 17 beyond that.
 18 Q. On 6 December 2018, was a decision made in relation to
 19 the investigation, your paragraph 112?
 20 A. It was. We decided that we would, having received the
 21 threat reporting, the two strands that we referred to
 22 earlier, that we would increase the priority of the
 23 investigation to a Priority 3.
 24 Q. Was that the decision solely of MI5 or did the police
 25 contribute?

1 A. That was MI5's decision.
 2 Q. What was the rationale for the decision?
 3 A. It was following an internal discussion where we
 4 discussed the threat reporting, and whether it was
 5 perhaps more appropriate to have a slightly higher
 6 prioritisation. The team leader, with whom the
 7 investigator discussed this, agreed that it was, and the
 8 priority was changed.
 9 Q. Was the effect of that decision that the resource or
 10 intensity of the investigation would or could increase?
 11 A. It would enable some further monitoring.
 12 Q. At that time, what was MI5's assessment of the
 13 reliability of the attack aspiration intelligence?
 14 A. It still remained of unknown validity and it was still
 15 uncorroborated.
 16 Q. Nevertheless, is it right that these two strands of
 17 intelligence did influence MI5 in its decision to
 18 regrade the investigation to P3?
 19 A. Absolutely.
 20 Q. So to that extent, the team expressed, in reasonably
 21 clear terms, concern about this intelligence?
 22 A. Yes.
 23 Q. Moving on in time, your paragraph 113. Was a quarterly
 24 review held in December 2018?
 25 A. Yes, that's correct.

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1 Q. Did that record that Khan would be subject to licence
 2 conditions on his release?
 3 A. Yes.
 4 Q. Did it say anything about what the consequence of those
 5 reasonably strict licence conditions was?
 6 A. It noted that it might pose a challenge in obtaining
 7 appropriate level of coverage of Khan's activities.
 8 Q. So that was a challenge identified at the outset:
 9 because he was subject to such strict conditions,
 10 getting useful coverage on him might be more difficult
 11 than on others in the community?
 12 A. That's correct. It just means that we need to
 13 complement the licence conditions with our
 14 investigation, so that they work in tandem with each
 15 other.
 16 Q. Was any view taken at that point about the need to
 17 understand Khan's mindset and intentions?
 18 A. It was absolutely an aim of the investigation to
 19 understand his mindset and intentions.
 20 Q. Are you able to say any more about how that was to be
 21 done?
 22 A. I am afraid I can't.
 23 Q. Your paragraph 114. Did MI5, on 18 December 2018,
 24 receive details of the specific licence conditions as
 25 well as confirmation of the part 4 notification

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1 requirements?
 2 A. Yes, we did.
 3 Q. In line with the decisions which have been outlined
 4 earlier, were steps then taken to ensure a degree of
 5 coverage?
 6 A. Yes, that's right, a proportionate level of coverage to
 7 the threat he was assessed to pose.
 8 Q. Are you able to say anything more than that about the
 9 level and type of coverage that was put in place?
 10 A. The only thing I can add to what I've already said was
 11 that we agreed that there would be an initial period of
 12 enhanced surveillance put in place.
 13 Q. Was there then a further JOT meeting held on
 14 19 December 2018?
 15 A. Yes.
 16 Q. Your paragraph 115. What was the purpose and effect of
 17 that meeting?
 18 A. It was really a further meeting just to make sure that
 19 we were all absolutely ready for Khan's release, and to
 20 describe the trigger plan to respond to any potential
 21 breaches by him post-release, so should he breach his
 22 licence conditions, everybody would know what to do.
 23 Q. That was, I think, a trigger plan originating in the
 24 police?
 25 A. That's correct.

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1 Q. Moving, then, on to his release from your paragraph 117.
 2 We know that he was automatically released on
 3 24 December 2018 with his compliance supervised by
 4 Staffordshire Prevent officers and managed through
 5 MAPPA. Can I take it from your previous answers that
 6 you were aware of all that at the time?
 7 A. Yes, that's right.
 8 Q. Was MI5 aware of the frequency and nature of the Prevent
 9 Team visits, what format they would take?
 10 A. Yes, we were.
 11 Q. Were you, therefore, aware that the Prevent Team were
 12 police officers without counter-terrorist investigation
 13 experience who would, on their own account, be seeing
 14 Khan for general chats and giving generalised updates?
 15 A. So what I would say is that we were in receipt of the
 16 reporting from those visits, so that we were able to
 17 understand Khan's mindset and his level of engagement.
 18 I would say that we didn't have full details of exactly
 19 how the meetings were taking place or how they were
 20 being managed. That would be for Staffordshire Police
 21 to manage internally.
 22 Q. We have seen the reports of those visits. On the basis
 23 that, as you've said, you received them -- you, MI5 --
 24 it would have been apparent that these weren't searching
 25 or critical conversations that took place; is that

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1 right?
 2 A. I can't comment on how we used that information that we
 3 received.
 4 Q. Did MI5 believe or understand that the Prevent Team had
 5 been informed about either the "old ways" intelligence
 6 or the attack—planning intelligence?
 7 A. We didn't have any direct contact with the
 8 Staffordshire Prevent Team, so we would not have been
 9 aware of what they may or may not have been told through
 10 the MAPPa construct.
 11 Q. Just to be clear, your team didn't even know that
 12 indirectly via the police teams involved in the covert
 13 investigation?
 14 A. I don't believe so, no.
 15 Q. We know that the police contributed to the discussion of
 16 licence conditions in the MAPPa meetings. Did MI5 play
 17 any part in that discussion indirectly?
 18 A. We were shared a draft in advance of the meeting, and
 19 asked if we wished to comment on it. We reviewed it and
 20 we had no comments to make.
 21 Q. Around this time, was it any part of MI5's strategy that
 22 the police should look for opportunities positively to
 23 return Khan to prison?
 24 A. So our strategy was about trying to identify whether or
 25 not he was going to engage in activities of national

1 security concern. If in the course of that
 2 investigation we identified activities which suggested
 3 he was breaching his licence conditions, then obviously
 4 we would have, with police colleagues, sought to
 5 intervene.
 6 Q. Your paragraph 119. Shortly before Khan's release, did
 7 MI5 receive information about interactions between
 8 Staffordshire Police and Khan?
 9 A. We did, yes.
 10 Q. What was that information?
 11 A. So we were made aware that he was saying to the police
 12 officers that he was seeing that he had been caught up
 13 in an ideology when he was convicted, that his Islamic
 14 knowledge was limited at a time.
 15 Q. And also, I think, that he had broken ties with old
 16 associates?
 17 A. Yes, that's correct.
 18 Q. What was MI5's assessment of the situation, ie Khan
 19 telling this to the Staffordshire Police officers?
 20 A. I think we remained sceptical, we assessed that
 21 potentially it could be him seeking to influence his
 22 licence conditions rather than necessarily a true
 23 intention of compliance.
 24 Q. Did MI5 share that view with any other agencies or
 25 police bodies?

1 A. I've got no record to suggest that that was specifically
 2 shared with any other authority at the time. It may
 3 well have been part of discussions with police
 4 colleagues, but I haven't got a formal written record of
 5 that.
 6 Q. In general terms, was it a theme in any of the
 7 discussions with police colleagues that Khan may be
 8 dishonest and manipulative in statements like this that
 9 he had made a change in his outlook?
 10 A. I think that it was fairly obvious in the risks that he
 11 may seek to re-engage in activities of national security
 12 concern, that in order to do so he would have to be
 13 either trying to avoid scrutiny from the authorities or
 14 trying to hide his true intentions.
 15 So I think to that end, it was a fairly sort of
 16 obvious part of our strategy to understand what his
 17 mindset was at the time.
 18 Q. Did the MI5 investigation team take any steps to
 19 discover whether those directly managing Khan, so the
 20 Staffordshire Prevent Team and the probation officer,
 21 were accepting this kind of statement or equally
 22 critical?
 23 A. I can't, unfortunately, comment on the detail of what
 24 exact investigative steps we took during the course of
 25 that early part of the investigation.

1 Q. Your paragraph 120. Immediately prior to Khan's
 2 release, did MI5 produce an internal note to assist
 3 officers working out—of—hours?
 4 A. We did, yes.
 5 Q. Did that include a summary of information, including the
 6 attack aspiration intelligence?
 7 A. It did, yes.
 8 Q. Is the production of such a note routine, or does it
 9 indicate a particular concern about the SOI that such
 10 a note is being produced?
 11 A. It's actually very routine, particularly if you think
 12 about the time that we were talking about, just before
 13 Christmas, where you might have different investigators
 14 in at different times over the Christmas period. And
 15 therefore it's an aide—memoire, if you like, for those
 16 working out—of—hours who can quickly sight themselves on
 17 the key pieces of intelligence and then they know where
 18 to go to find more should the need arise.
 19 Q. Your paragraph 121. Did you receive details from
 20 Staffordshire Police about Khan's release and what he
 21 had said to officers on that occasion?
 22 A. We did, yes.
 23 Q. What, in summary, were you told?
 24 A. We were told that on the journey to his approved
 25 premises, he had accepted his imprisonment and fault and

1 conviction. He had felt exploited by others. He
 2 expressed the desire to change. He showed an interest
 3 in Prevent, and he even stated that he wanted to become
 4 a mentor in de-radicalisation.
 5 Q. We've heard that on that occasion he said that he had
 6 felt deserted or let down by his co-defendants, who had
 7 done deals. Was that information that came through to
 8 MI5?
 9 A. Yes.
 10 Q. Did MI5 make an assessment of the honesty of these
 11 comments, because, of course, with the co-defendants he
 12 had maintained apparently good relations with them for
 13 a period of years?
 14 A. I think I would describe them as one piece of the
 15 intelligence that we were receiving. It is MI5's job to
 16 remain inherently sceptical, and we continued to do so.
 17 Q. Wasn't this a particular reason for scepticism: that you
 18 knew he was telling the officers that he felt betrayed
 19 by people he in fact had had continued and apparently
 20 good relations with?
 21 A. Sorry, can you just repeat that question, please?
 22 Q. Yes, I'm sorry, it was an overlong question.
 23 You had received a report suggesting that Khan said
 24 he felt betrayed by his co-defendants?
 25 A. Yes.

1 Q. You knew that over a period of years, he had actually
 2 maintained contact with them while in prison, suggesting
 3 at least reasonable and cordial relations?
 4 A. Yes.
 5 Q. Didn't you consider that this was a specific reason to
 6 think that Khan was being dishonest to those managing
 7 him?
 8 A. I think it's a very different perspective when somebody
 9 is released from prison to the types of behaviours and
 10 activities that you see while they're in prison, and one
 11 is not necessarily indicative of what will follow, ie
 12 the way someone behaves when they're in prison isn't
 13 necessarily how they will behave when they are out of
 14 prison. I think we saw this as one piece of
 15 intelligence in the overall jigsaw for Khan at that
 16 time.
 17 Q. Your paragraph 122. We know that in early January 2019,
 18 Staffordshire Police Prevent officers visited Khan and
 19 there was a problem about his mobile phone having
 20 internet connectivity. He raised this, said he hadn't
 21 accessed the internet, and another phone was provided.
 22 Was the information of that visit passed through to MI5?
 23 A. Yes.
 24 Q. Your paragraph 123. You have referred to a decision to
 25 carry out an initial period of heightened surveillance

1 on Khan. Did that take place in this early period?
 2 A. Yes, it did.
 3 Q. What information was produced by that heightened
 4 surveillance?
 5 A. I think it gave us information that he was visiting
 6 a number of shops in Stafford town centre, where he was
 7 located. He was making a number of purchases, including
 8 an Xbox. He didn't attempt to travel anywhere else by
 9 car or public transport, and he did not keep going back
 10 to the same location time and time again.
 11 Q. Your paragraph 124, please. Was an assessment made of
 12 Khan based on the intelligence and the surveillance at
 13 this time?
 14 A. We were assessing that he had been complying with his
 15 licence conditions and likely that he wanted to prove
 16 that he wasn't a danger to the authorities.
 17 Q. Did the team express any concern about his actual
 18 motivation?
 19 A. I think we continued to remain sceptical, whether
 20 compliance was an attempt to avoid scrutiny from the
 21 authorities, but we didn't see any actual intelligence
 22 to indicate that that was the case.
 23 Q. Did that concern, that Khan's motivation for compliance
 24 was to avoid scrutiny, did that concern recur on
 25 a number of occasions during 2018 and 2019 including in

1 formal documents produced by MI5 assessing risk and the
 2 justification for intrusive measures?
 3 A. Yes, it did.
 4 Q. So it wasn't a concern which passed; it was a concern
 5 which was restated multiple times during that period?
 6 A. I think it's fairly typical of an MI5 investigation for
 7 the investigators to remain very sceptical throughout,
 8 particularly when you're looking at an individual with
 9 Khan's terrorist background.
 10 Q. Looking back at your paragraph 124, what was done as
 11 a result of that concern?
 12 A. We maintained our coverage.
 13 Q. Was that with a view to getting a better understanding
 14 of his circumstances, any associations and his
 15 intentions?
 16 A. Yes, that's correct, and we deployed a number of
 17 capabilities against him to meet these requirements.
 18 Q. Do you describe these requirements in your witness
 19 statement as high priority?
 20 A. They were high priority.
 21 Q. Are you able to say anything more in open about the
 22 forms and level of coverage other than that it involved
 23 heightened surveillance?
 24 A. I am afraid I cannot, other than that it was
 25 proportionate to the threat that we assessed Khan posed

1 at the time.
 2 Q. Did the coverage indicate that Khan was or might be in
 3 contact with any former associates or any persons of
 4 concern?
 5 A. We saw no indication of that.
 6 Q. Was MI5 satisfied that its coverage was providing it
 7 with a reasonably complete picture of Khan's movements,
 8 communications and associations?
 9 A. I think we were content that the level of coverage in
 10 place was proportionate to the threat posed.
 11 Q. Did MI5 share that intelligence with any of the police
 12 teams or any other agencies?
 13 A. We shared all intelligence with our police colleagues.
 14 Q. That's the CTU and Special Branch teams?
 15 A. That's correct.
 16 Q. And was it then for them, as you have indicated earlier,
 17 to decide whether to pass that intelligence on to
 18 others?
 19 A. That's correct, yes.
 20 Q. Your paragraph 125, moving to March 2019. We know that
 21 Staffordshire Police around this time discovered that
 22 Khan would be attending Friday prayers at a particular
 23 mosque, which Staffordshire Police had approved, and
 24 that a disclosure of his offending had been made to the
 25 mosque committee. Did that information go through to

1 MI5?
 2 A. Yes.
 3 Q. We also know that the Prevent Team ascertained that he
 4 was attending a gym in Stafford and, again, that Khan
 5 had disclosed his conviction or, rather, on this
 6 occasion, Khan had proactively disclosed his own
 7 conviction to the gym manager?
 8 A. Yes, that's correct.
 9 Q. And that came through as well, did it?
 10 A. Yes.
 11 Q. Over this period, was there any intelligence suggesting
 12 that Khan was actually involved in any activities of
 13 national security concern?
 14 A. There was no intelligence.
 15 Q. Was any decision taken about investigation around this
 16 time in light of the previous intelligence about Khan's
 17 intention to move to Pakistan?
 18 A. So we were aware that that remained a desire on his
 19 part. We thought that it was important to be able to
 20 identify any indication that he was seeking to renounce
 21 his British citizenship or indeed that he might plan to
 22 take any action to travel.
 23 Q. Did any information emerge from work done in that
 24 regard?
 25 A. We saw that he had been taking some steps to obtain

1 a Pakistani passport and he was considering how and when
 2 he should renounce his British citizenship, but what we
 3 hadn't seen was any indication that he was planning to
 4 travel to Pakistan for nefarious purposes.
 5 Q. Did the intelligence indicate that he continued to wish
 6 to relocate to Pakistan in general terms though?
 7 A. Yes, that's correct.
 8 Q. Was there any concern about this intelligence given that
 9 it was consistent with previous information and, of
 10 course, would have represented a breach of licence?
 11 A. I think certainly we were mindful of the potential that
 12 should he seek to try to travel it would absolutely
 13 amount to a breach of licence, for which action would
 14 need to be taken, but we hadn't seen any intelligence to
 15 indicate that he wanted to travel for, as I said,
 16 nefarious purposes. The indications that we received
 17 were more that he didn't see a future life staying in
 18 the UK, and that he had familial links in Pakistan.
 19 Q. Wasn't it considered that he might have extremist
 20 purposes in mind given the nature of his previous
 21 offending and his desire to set up a militant facility
 22 there?
 23 A. That was definitely part of the picture.
 24 Q. Did MI5 assess at this time that his wish to move was
 25 sincere and that it was realistic?

1 A. I think certainly his desire to relocate was sincere;
 2 whether it was realistic, I think not. I don't think he
 3 had the means to travel and he was under very stringent,
 4 as you say, licence conditions which prevented him from
 5 travelling.
 6 Q. On 12 March 2019, DS Stephenson of Staffordshire Special
 7 Branch, according to his witness statement and his
 8 records, contacted the MI5 team to ask for a Behavioural
 9 Science Unit assessment of Khan, to understand, as he
 10 puts it, the mindset trajectory from the time of release
 11 to the time of request. Can you confirm that that
 12 request was made?
 13 A. I can confirm that he sought our views on whether it
 14 would be useful to have such an assessment.
 15 Q. What was the response given?
 16 A. So I can't find a record of an actual response back to
 17 him in writing, I'm absolutely sure that it was
 18 discussed with police colleagues because we would
 19 definitely have seen a follow-up request in writing had
 20 it not been. We decided not to do a BSU assessment at
 21 that time. The reason for that was that we, as part of
 22 our quarterly case reports, had been conducting a number
 23 of what we call potential lone actor assessments. These
 24 are assessments that decide whether or not someone has
 25 a propensity to be a potential lone actor. There are

1 two parts to these assessments, and forgive me for going
 2 into a little bit of detail here, but I think it might
 3 be useful.
 4 The first part is a triage, if you like, which is
 5 done by the investigation, which seeks to answer
 6 a number of questions, and if those criteria are met,
 7 then it proceeds to stage 2, which is a full behavioural
 8 science assessment.
 9 Now, on each of the occasions that the potential
 10 lone actor assessment stage 1 was carried out by the
 11 investigative team, it did not meet the criteria and
 12 therefore it did not move on to a full BSU assessment.
 13 Therefore, because we had been doing these potential
 14 lone actor assessments and the outcome was that a full
 15 assessment was not required, we did not do one at this
 16 time in response to this request. I hope that clarifies
 17 the position.
 18 Q. Can you say why the criteria were not satisfied at
 19 stage 1 on each of these occasions?
 20 A. Unfortunately I can't go into the detail of what the
 21 criteria were.
 22 Q. Are you able to say whether the reason was concerned
 23 with conduct, intent, capacity, or can you say nothing
 24 more?
 25 A. I am afraid I can say nothing more.

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1 Q. If a BSU, Behavioural Science Unit assessment had taken
 2 place, what sort of person would have been conducting it
 3 and what sort of assessment would it have been?
 4 A. So our Behavioural Science Unit consists of experts in
 5 the field of behavioural science, and they conduct
 6 assessments which look at a range of scenarios which aim
 7 to support an investigative team in terms of the
 8 decisions and the next steps that they might choose to
 9 take.
 10 And, sorry, what was your second part of the
 11 question?
 12 Q. I was asking about the sorts of person who might perform
 13 the assessment and what its content might be?
 14 A. Yes, so I think I've covered that.
 15 Q. I think you have.
 16 DS Stephenson also says that around this time he
 17 sent MI5 a copy of a video made by Usman Khan for the
 18 purposes of a Cambridge University event, and also
 19 a copy of a mentor report which referred to Khan
 20 displaying a flash of anger in dealings with the mentor.
 21 Can you confirm whether those were received by MI5?
 22 A. I can confirm that we received the video. I am afraid
 23 I can't confirm the detail of any other reports.
 24 Q. Was any assessment made of the video?
 25 A. We did view the video, and we concluded that it didn't

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1 add or detract from the current assessment of Khan at
 2 that time.
 3 Q. The video did contain some statements by Khan which were
 4 factually untrue, including that he had spent the
 5 majority of his prison sentence in segregation. Was
 6 that a point noted by the investigation team?
 7 A. I think it was noted as an exaggeration of the existing
 8 situation but, as I say, it didn't particularly add or
 9 detract to the assessment of him at that time.
 10 Q. Moving on to your paragraph 126 and May 2019. We know
 11 that Khan was invited to a Cambridge University event at
 12 Whitemoor Prison, and that he attended the event
 13 ultimately on 12 June 2019. Did MI5 become aware of
 14 this proposed event in May 2019?
 15 A. We did, yes.
 16 Q. What else did you become aware concerning the event?
 17 A. We became aware that he had -- about the event
 18 particularly that three of the attendees were associates
 19 of Khan during the time he had been in prison.
 20 Q. Did you become aware whether Khan would be visiting
 21 going to that event alone or accompanied?
 22 A. I don't believe we had that detail.
 23 Q. Paragraph 127, in June 2019 we've heard that Khan's
 24 licence conditions were amended to remove the daily sign
 25 on requirement and potentially to modify the curfew

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1 time. Was that information that came into MI5's hands?
 2 A. Yes, that's right.
 3 Q. We also know that he sought to and did attend
 4 a construction course for employment purposes and that
 5 he wanted to move out of the approved premises around
 6 that time?
 7 A. Yes, that's correct.
 8 Q. Did that also come into your hands?
 9 A. Yes.
 10 Q. Did you also receive any intelligence about whether he
 11 continued in his desire to relocate to Pakistan?
 12 A. We did, yes.
 13 Q. Just pausing here before we get to the quarterly case
 14 review in summer of 2019, were there any times over the
 15 period of early to mid-2019 that Khan would have been
 16 subject to a higher level of investigation but for
 17 limitations of resources, and in that I include the
 18 capacity of officers?
 19 A. No, that's not the case.
 20 Q. Paragraph 128, please. Was there a quarterly case
 21 review in the summer of 2019?
 22 A. Yes, there was.
 23 Q. What was recorded in the context of this review?
 24 A. It recorded the fact that he continued to comply with
 25 his licence conditions but it also recorded, maintained,

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1 if you like, the risk that we had identified before that
 2 based on the information prior to release, the "old
 3 ways" and the attack—planning reporting, that he could
 4 become involved in attack—planning.
 5 Q. Was the scepticism about his motivation for compliance
 6 reiterated?
 7 A. It was, yes.
 8 Q. That is to say that it was an attempt to avoid scrutiny
 9 rather than a change of mindset?
 10 A. Yes, but I have to just add that it was a judgment on
 11 behalf of MI5, it wasn't because there was actually any
 12 intelligence to indicate that he was trying to avoid
 13 scrutiny.
 14 Q. Thank you.
 15 What decision was made at this review?
 16 A. The decision that was made was that we would continue
 17 to — with a range of monitoring options against Khan.
 18 Q. Was that with a view both to understanding his current
 19 mindset and understanding whether any of his actions
 20 might be of national security concern?
 21 A. Yes, that's correct.
 22 Q. Now, you've told us that MI5's scepticism about Khan's
 23 motivation was its own judgment rather than based on
 24 intelligence?
 25 A. Yes.

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1 Q. Nevertheless, such scepticism on the part of experienced
 2 intelligence officers can be of use to other agencies,
 3 can't it?
 4 A. Yes.
 5 Q. Was it shared with any other agencies in fact?
 6 A. So I can't find a written record to suggest that it was
 7 shared with our police colleagues. Our police
 8 colleagues are invited to attend our quarterly case
 9 reports, which are internal MI5 meetings. We don't
 10 minute whether the police actually attend them or not,
 11 so I can't say whether they would have actually been
 12 party to those discussions.
 13 CT policing would have been the only people that we
 14 would have shared that information with. I'm fairly
 15 sure that from conversations with the investigators
 16 involved that we would have shared those views with our
 17 police colleagues but, as I say, I haven't got it in
 18 writing.
 19 Q. Is it right, though, that the investigation team
 20 wouldn't have known whether the offender manager and the
 21 officers doing the overt management were aware of that
 22 scepticism on the part of the intelligence officers?
 23 A. That's right. We wouldn't have known whether they knew.
 24 Q. Isn't that a matter of concern in itself: that there may
 25 be intelligence officers over here displaying

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1 an informed scepticism, and a probation officer and
 2 managing officers over there lapping it all up?
 3 A. Well, the MAPPAs construct is such that we liaise very
 4 closely with our police colleagues and our police
 5 colleagues act as the bridge into that overt management
 6 community. I'm absolutely sure that they would have
 7 shared the right kind of information at the right time
 8 with those people that needed to know it.
 9 Q. Does that then rely upon those officers in the MAPPAs
 10 meetings either sharing that scepticism or taking
 11 decisions informed by it?
 12 A. It would do, and I would note that having reviewed the
 13 MAPPAs minutes obviously received post—attack that
 14 from July onwards, manipulation was definitely recorded
 15 as one of the risks.
 16 Q. Can you on behalf of MI5 say anything more about the
 17 monitoring options used at this time?
 18 A. I am afraid I cannot.
 19 Q. Did MI5, however, take a view on how likely they were to
 20 yield useful intelligence?
 21 A. I think that we don't put monitoring options in place
 22 lightly. We obviously need to make sure that what we
 23 put in place is proportionate to the threat posed and is
 24 absolutely necessary in terms of the intrusion,
 25 therefore we were very hopeful that we might gain

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1 insight into mindset and to identify whether his actions
 2 were of national security concern.
 3 Q. July 2019, your paragraph 129, we know that
 4 Staffordshire Police became aware that Khan had attended
 5 the construction skills course, and that a MAPPAs
 6 discussion of Khan took place in this month. Did MI5
 7 become aware of that background and that discussion?
 8 A. Yes.
 9 Q. It was noted by MAPPAs at this time that Khan had been
 10 approached to speak about de—radicalisation and that the
 11 MAPPAs attendees agreed that it was too soon to do so.
 12 Was that information that came through to MI5?
 13 A. Yes.
 14 Q. The attendees also discussed at this time whether Khan
 15 could attend a dumper truck course. Did MI5 discover
 16 that discussion?
 17 A. Yes, we did.
 18 Q. What information did MI5 receive about that discussion?
 19 A. So police colleagues sought our views as to whether
 20 they — whether we thought that it would be
 21 an appropriate thing for Khan to do. We did not think
 22 that it would be a sensible course to allow him to go
 23 on. There had been a number of terrorist cases in the
 24 past with terrorists using large vehicles as weapons and
 25 we did not think that putting this capability into

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1 Khan's hands would be advisable.
 2 Q. In your witness statement you say -- this is towards the
 3 top of page 31:
 4 "The attendees [of the MAPPa meeting] also discussed
 5 whether Khan could attend a dumper truck course and
 6 highlighted the possible reputational damage as a TACT
 7 offender of having access to a large vehicle."
 8 Is that information that came through to you?
 9 A. Yes.
 10 Q. The MI5 perspective, though, as you've described it, was
 11 very different from reputational concerns: it was
 12 concerns about preventing a terrorist getting his hands
 13 on a potentially mass destructive weapon?
 14 A. Sorry, is that a question?
 15 Q. Yes.
 16 A. Yes.
 17 Q. I was just asking you to confirm that your officers had
 18 a very different view from that which was reported to
 19 you from the MAPPa discussion?
 20 A. Well, my understanding of the context of possible
 21 reputational damage was were he to go on and conduct
 22 an attack, so I believe that the potential use of
 23 a dumper truck as an attack weapon was discussed.
 24 Q. It's not, however, an ideal way of describing it, is it,
 25 that it would be reputationally damaging if somebody

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1 committed an atrocity?
 2 A. It is not ideal.
 3 Q. Was it also noted and passed on to MI5 at this time that
 4 Khan hadn't reconnected with old friends following his
 5 release and that he was, in fact, quite solitary?
 6 A. Yes.
 7 Q. Was it passed on to MI5 that the police managing Khan
 8 felt that he was happy in his own company, and that he
 9 had some family support?
 10 A. Yes, that's correct.
 11 Q. But was it also passed on that those officers thought
 12 that Khan was spending the majority of his time either
 13 in the gym or playing on computer games?
 14 A. Yes, that's right.
 15 Q. Was it also passed back that there had been discussion
 16 at MAPPa of Khan's possible intent to give up British
 17 nationality?
 18 A. Yes, that's right.
 19 Q. Now, your paragraph 130, we know it was later agreed by
 20 MAPPa that given the terrorist conviction and Khan's
 21 behaviour in the past, that the dumper truck course
 22 should be vetoed. Did MI5 become aware of that?
 23 A. Yes, that's right.
 24 Q. And was it considered that effectively the MAPPa panel
 25 had taken a decision in line with MI5's guidance to its

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1 police colleagues?
 2 A. Yes.
 3 Q. So is this an instance of where MI5 could influence
 4 a MAPPa decision by expressing its real concerns to the
 5 police attending that meeting?
 6 A. So I can't say whether the MAPPa decision was based on
 7 the advice that we provided to police colleagues or
 8 whether they would have come to that decision
 9 themselves, but I can confirm that we did provide that
 10 advice to police colleagues and they briefed that in to
 11 the MAPPa meeting.
 12 Q. Presumably the investigative officers would have been
 13 rather concerned if their advice and views had been
 14 ignored, and the dumper truck course had been allowed to
 15 go ahead?
 16 A. We would have been concerned.
 17 Q. Now, the intelligence, or information, that Khan had not
 18 re-engaged with his old friends on release, and that he
 19 was becoming, as a result, more isolated, was that
 20 a matter of concern, social isolation, or reassurance,
 21 he's away from bad influences?
 22 A. I think at the time it was the latter: that he was not
 23 engaging with associates of concern that could
 24 potentially be a bad influence on him, and increase his
 25 likelihood of re-engaging with activities of national

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1 security concern.
 2 Q. Paragraph 131, please. In August 2019, did MI5 become
 3 aware that Khan had become quite challenging towards the
 4 staff of his approved premises about problems with his
 5 eligibility for housing?
 6 A. Yes, we became aware that he was frustrated.
 7 Q. In the event, we know he did find a privately rented
 8 flat into which he moved in late September 2019. Was
 9 that something which MI5 became aware of at the time?
 10 A. Yes, that's right.
 11 Q. Was there then an October quarterly case review?
 12 A. Yes, there was.
 13 Q. What was the view taken and expressed in that review?
 14 A. The view was that Khan wasn't engaged -- we hadn't seen
 15 any intelligence to suggest that Khan was engaged in
 16 activities of national security concern. We did note
 17 that his move from a relatively strict approved premises
 18 to a privately rented flat was potentially an additional
 19 risk.
 20 Q. Was it also considered a limiting factor in coverage
 21 opportunities?
 22 A. I am afraid I'm not able to comment one way or the other
 23 in respect of that.
 24 Q. Did MI5 at this point positively form a view that Khan
 25 wasn't likely to be engaged in attack-planning, or

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1 simply that there was no intelligence that he was?
 2 A. It was the latter: no intelligence that he was.
 3 Q. Did it positively form the view that his intent or
 4 capability had changed from the previous assessments
 5 you've described?
 6 A. Certainly his capability had not altered or changed over
 7 the course of the period. He had been under very strict
 8 licence conditions. We hadn't seen anything to indicate
 9 that his intent was any different, but at that stage,
 10 some 10 months after release from prison, we were also
 11 looking at a quite prolonged period of no activities of
 12 national security concern, set against a period where he
 13 appeared to be engaging positively with his
 14 rehabilitation, seeking jobs, visiting his family, and
 15 we have to look at all of that in the round, and that
 16 was the picture at the 10-month period.
 17 Q. So you've described those positive features, but you've
 18 also said that the assessment was made that the move to
 19 the flat raised a particular risk of re-engagement in
 20 extremist activities?
 21 A. That's right. That's because he might have been under
 22 the impression that there was more freedom for him to
 23 engage in such activities without being under scrutiny.
 24 It was for our investigation to identify whether that
 25 was the case or not.

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1 Q. Were there any particular forms of extremist activity
 2 you had in mind in making that assessment?
 3 A. I don't think they were any different to the ones that
 4 we'd had right from the beginning, that he might seek to
 5 re-engage with old associates, fundraise for
 6 terrorist-related activities, et cetera.
 7 Q. Did MI5 share with any other agencies its assessment
 8 that the move to the flat raised a risk of re-engagement
 9 in extremist activities?
 10 A. Again, this was noted in a quarterly case report, which
 11 is an internal MI5 meeting. I can't say whether police
 12 colleagues did attend that meeting, for the reasons
 13 I have mentioned before. I can't see any -- I can't see
 14 it contained in any written documentation from us, but
 15 I'm fairly sure it would have been discussed with our
 16 police colleagues, as we had quite a lot of discussion
 17 around the move into the approved premises -- sorry, the
 18 move into the private flat.
 19 Q. Yes. In early November 2019, on 6 November 2019,
 20 according to DS Stephenson, he spoke with MI5 officers
 21 by phone to discuss his concerns that Khan appeared to
 22 be isolating himself. Can you confirm that that
 23 communication was made?
 24 A. So we don't routinely record phone conversations with
 25 police colleagues, so I don't have a note of that

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1 conversation. I don't doubt, though, that it did take
 2 place.
 3 Q. Can you say whether the investigative officers agreed
 4 with that concern?
 5 A. Given that I don't have a record of what the nature of
 6 the conversation was, I know that similar views were
 7 raised at the JOT in November, and they were similar to
 8 the ones that DS Stephenson is saying that he raised at
 9 that phone call.
 10 Q. Your paragraph 132. We know that in a visit on
 11 31 October 2019, the Staffordshire Prevent Team officers
 12 noted that Khan was going to the gym less, had stopped
 13 going to the mosque and overall was spending a lot of
 14 time in his flat playing DVDs and playing on computer
 15 games, but that he was continuing to see his family
 16 weekly. Did that information come through to MI5?
 17 A. It did.
 18 Q. Around this time, did MI5 consider that this social
 19 isolation increased the risk that Khan posed?
 20 A. So I would -- I would slightly rephrase the social
 21 isolation. Just to give a bit of context, following the
 22 release of Khan from prison, he did not have a very
 23 lively social circle with whom he engaged on a very
 24 regular basis. He was fairly solitary, right from the
 25 outset, but even so, he maintained visits to the gym, he

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1 went to the mosque, until at least the July time, and he
 2 continued to engage with the authorities that he was
 3 required to engage with.
 4 Therefore, I wouldn't describe it necessarily as
 5 a sort of massive step-change as such, because there
 6 wasn't a huge social circle from whom he was stepping
 7 away from, if you like. He was still seeing his family
 8 on a weekly basis, and he was still, right up until at
 9 least the October time, visiting the gym on a fairly
 10 regular basis.
 11 I would say also to bear in mind context-wise that
 12 it was the first time that he had had his own
 13 accommodation for some 10 years, and therefore, to be in
 14 his own flat in that time, perhaps it was slightly less
 15 surprising that he chose to spend more time there.
 16 We didn't not take the police's concerns seriously,
 17 but it was part of a picture.
 18 Q. Without going into details that you can't, was coverage
 19 continuing on Khan in this period?
 20 A. It was, yes.
 21 Q. Looking back, with your knowledge of the post-attack
 22 review and all the documents, do you consider that
 23 anything more realistically could have been done to
 24 increase coverage on Khan at this point, so autumn of
 25 2019?

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1 A. I think that the coverage at the time was proportionate
 2 to the threat that we were seeing Khan pose.
 3 Q. In November 2019, Mr Skelton, the offender manager,
 4 completed an ERG assessment concluding that Khan's risk
 5 of re-offending was low. Was MI5 aware of that?
 6 A. We're aware of the ERG assessment tool, but I am afraid
 7 I can't comment on whether or not we received individual
 8 ERG assessments.
 9 Q. Would it have agreed with the proposition -- would the
 10 investigative team have agreed with the proposition that
 11 Khan's risk of re-offending was low?
 12 A. I think at that time we were -- it's our responsibility
 13 to understand whether somebody is likely to re-engage in
 14 terrorism or not. At that stage we were looking at
 15 a period of 10, nearly 11 months of no activities of
 16 national security concern against the picture of where
 17 he was, seemingly, re being rehabilitated into the
 18 community, seeking jobs, et cetera. So that was our
 19 assessment at the time.
 20 Q. Although is this right: you've confirmed that in the
 21 formal documents assessing risk and justification for
 22 intrusive measures, concern continued to be noted
 23 through 2019 that Khan's motivation for compliance was
 24 to avoid scrutiny?
 25 A. So we remained sceptical throughout the period, yes.

1 Q. Also in late 2019, PS Forsyth, the officer responsible
 2 for the overt management, completed his own assessment
 3 in a different form, again, presenting Khan as being
 4 a very low risk. Are you able to say whether that came
 5 into MI5's hands?
 6 A. I am afraid I can't.
 7 Q. Would the investigation team have agreed with that
 8 conclusion by PS Forsyth?
 9 A. I think my answer would be the same: we had seen no
 10 activities of national security concern over the sort of
 11 previous 10, 11 months.
 12 Q. On 14 November 2019, there was a MAPPa meeting in
 13 relation to Usman Khan. Are you able to say whether MI5
 14 received a report back from that meeting by any means?
 15 A. I'm not, I am afraid.
 16 Q. In the minutes, the panel noted that more investigation
 17 was needed into what Khan was doing at his home. Was
 18 that a view which was communicated to MI5 even if you
 19 can't say whether the contents of the discussion were?
 20 A. So that was a view that was communicated to us during
 21 the course of the JOT meeting, the joint operational
 22 team meeting, that was held on 18 November. Our police
 23 colleagues expressed concern about Khan's solitary
 24 behaviour, that we've just spoken about, and it was
 25 agreed at that meeting that the Prevent meetings would

1 be increased.
 2 Q. Turning, then, to the visit to London and events later
 3 in November 2019, is it right, your paragraph 133(e) on
 4 page 32, is it right that MI5 became aware that Khan was
 5 to travel to London for the event to be staged by
 6 Cambridge University?
 7 A. If I may, just a little bit of clarification .
 8 Q. Yes, of course.
 9 A. We first became aware that Khan had been invited to
 10 a Learning Together event in London in August. We then,
 11 in late October, had confirmation that he was actually
 12 going to be attending an event, but we didn't have
 13 confirmation of where the actual event was until
 14 22 November.
 15 Q. Are you saying that you didn't even know that it was
 16 going to be in London until 22 November?
 17 A. No, we knew it was London, but we didn't know the actual
 18 location until 22 November.
 19 Q. Are you able to say from which agency or source MI5
 20 obtained its initial information about the proposed
 21 visit, so the information in August and October?
 22 A. I'm not, I am afraid.
 23 Q. Did MI5 raise questions at either of those times, August
 24 or October, about precisely where the event would be
 25 taking place and what sorts of people would be

1 attending?
 2 A. No, we did not.
 3 Q. Why not? Wouldn't that be a matter of interest to
 4 an investigation team?
 5 A. I think we were waiting to see over that period of time
 6 whether or not his attendance would actually be
 7 confirmed or not, and then we would seek to manage any
 8 input required closer to the time.
 9 Q. Now, we've seen that in the context of the dumper truck
 10 discussion, MI5 fed into the discussion at MAPPa
 11 meetings, albeit indirectly, by letting the police know
 12 its concerns; you recall that?
 13 A. Yes.
 14 Q. Didn't the investigation team consider that
 15 a prospective visit to London might warrant a similar
 16 contribution by MI5 indirectly into the MAPPa meetings?
 17 A. At that time there was no intelligence of concern that
 18 he was engaging in anything that looked like
 19 terrorist-related activities, so there wouldn't have
 20 been any intelligence to feed in to that meeting.
 21 Q. Here you have a situation where a terrorist offender who
 22 has displayed all these concerning features in prison,
 23 and whose motivation for compliance is still suspect, is
 24 being invited to an event in London. Surely
 25 an investigation team wants to know what sort of event,

1 where, and who is attending?
 2 A. So we were waiting for those details to be provided to
 3 us, but the context at the time was a backdrop of no
 4 concerning activities on behalf of Khan at all. We knew
 5 it was a Learning Together event for the rehabilitation
 6 of offenders, we knew that Khan had a long-standing
 7 relationship of over two years with this organisation,
 8 and we had seen no intelligence to indicate that there
 9 was any concern around him maintaining contact with that
 10 organisation.
 11 Q. Just to press once again: didn't the investigation team
 12 think that as part of their responsibility for
 13 protecting the public, they needed to know where Khan
 14 might be attending an event in London, and who might be
 15 there?
 16 A. So we did receive that information from police
 17 colleagues in November.
 18 Q. But very late in the day, the 22nd, a week before the
 19 attack?
 20 A. It's not unusual in investigations to receive
 21 information relatively last-minute. It depends when it
 22 becomes available.
 23 Q. Was MI5 aware around this time that in practice the
 24 decision to permit Khan to attend an event of that kind
 25 might be taken by the offender manager, who wasn't

1 sighted on anything like the same set of intelligence
 2 information as the investigation team?
 3 A. So we would be aware that the decision to allow him to
 4 attend or otherwise would be taken through the MAPPA
 5 authorities, but whether and what information they were
 6 actually in possession of was not for us.
 7 Q. Why wasn't it? Wasn't it part of your function to make
 8 sure that people making that kind of critical decision
 9 were properly informed, even if indirectly?
 10 A. I think the issue was that we had got no intelligence to
 11 indicate any concern around the trip, so there was,
 12 unfortunately, no intelligence to feed in to that
 13 meeting, to suggest that he should not attend.
 14 Q. But wasn't part of the function of MI5 not just to feed
 15 in information, but to feed in their collective wisdom
 16 and experience that letting a convicted terrorist with
 17 this profile go to an event in central London might be
 18 a matter to consider very carefully with a view to risk?
 19 A. I think at that time there was no intelligence to
 20 suggest that he should not be allowed to attend. The
 21 flip side occasionally that you also need to bear in
 22 mind is that preventing somebody from doing something
 23 can also have ramifications, and that would have been in
 24 mind, I'm absolutely sure, of those who were managing
 25 him in the community. Plus the context that I've

1 already described, in that he had a very positive
 2 relationship with Learning Together, and there was
 3 nothing to indicate that that would be of concern.
 4 Q. From the perspective of a senior intelligence officer,
 5 though, would you not think that allowing somebody such
 6 as Khan to take their first trip outside of Stafford,
 7 other than to a prison, by going to London without
 8 an escort, posed some degree of risk that should be at
 9 least considered and discussed?
 10 A. I think the team at the time would have been viewing
 11 those decisions as being taking part in the MAPPA
 12 construct, and that had we had any intelligence of
 13 concern, then we would have been feeding it in through
 14 our CT policing colleagues. We did not have such
 15 intelligence.
 16 Q. I don't think that was quite the question I asked. The
 17 question I asked was whether you, with all your wisdom
 18 and experience, would accept that this proposed visit,
 19 given the kind of person concerned, the timing and the
 20 context, presented some sort of risk that ought to have
 21 been discussed by those in the MAPPA meeting?
 22 A. I think that those at the MAPPA meeting -- I think our
 23 view at the time, and my view now, would be that those
 24 at the MAPPA meeting would be discussing that kind of
 25 risk.

1 Q. So that they should have been discussing it?
 2 A. I don't think it's really for me to quality assure what
 3 decisions were discussed at a MAPPA meeting or not.
 4 They had the information that we had, we had no
 5 additional intelligence of concern at that time to feed
 6 in.
 7 Q. Moving on, then, to the joint operational team meeting.
 8 Was a JOT, a joint operational team meeting, convened at
 9 this time, so 18 November 2019?
 10 A. Yes, that's correct.
 11 Q. What was the reason or catalyst for arranging that
 12 meeting?
 13 A. So usually when we set up a JOT meeting it is when we
 14 are -- when we've either got an intelligence update or
 15 when there's some operational management that needs to
 16 be worked through with policing colleagues. I would say
 17 at that particular time, after sort of nearly 11 months
 18 of investigation, post-release, we were heading at that
 19 stage towards closure of the investigation, and we
 20 wanted to discuss that with police colleagues.
 21 We had also become aware of the visit to London and
 22 we were seeing that as a potential opportunity to seek
 23 enhanced coverage of Khan during that period of time to
 24 give us greater assurance before seeking to close the
 25 investigation.

1 Q. You say that the London visit was in the minds of the
 2 team at that point as a potential opportunity for
 3 coverage. Was it also in their minds as a potential
 4 source of risk?
 5 A. We had not seen anything to indicate that it was
 6 a potential source of risk.
 7 Q. Who suggested the joint operational team meeting; are
 8 you able to say?
 9 A. I haven't -- I haven't got details of who suggested it,
 10 whether it came from police colleagues or whether it was
 11 initiated by MI5. Either way, either party can suggest
 12 it.
 13 Q. We understand from other evidence that it was attended
 14 by Staffordshire Special Branch, including Mr Hessel,
 15 Mr Stephenson and Ms Hartill, and by West Midlands CTU
 16 officers, including Mr Chambers and Mr Jerromes; is that
 17 correct?
 18 A. Yes.
 19 Q. Were there any other agencies or bodies represented at
 20 the JOT other than MI5, Staffordshire Special Branch and
 21 West Midlands CTU?
 22 A. No, there were not.
 23 Q. We know that PS Forsyth did not attend the JOT. There
 24 is some evidence in Mr Jerromes' statement and
 25 Mr Stephenson's major incident disclosure book that that

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1 was proposed at one stage; are you aware of that?
 2 A. I'm aware that there was some suggestion that MI5 wished
 3 him to be present at the meeting. I spoke -- I've
 4 spoken to the investigative team about that, to seek
 5 clarification. In fact, it was their view that there
 6 must have been some crossed wires, because they would
 7 have always wished to maintain the firewall that
 8 I mentioned before, to avoid any inadvertent disclosure
 9 between those who were dealing directly with Khan, and
 10 the covert investigation. So it did not take place.
 11 MR HOUGH: I'm just about to move to the positive discussion
 12 at the JOT; would that be a convenient time for our
 13 lunch break, sir?
 14 JUDGE LUCRAFT: We will break there, Mr Hough, and we'll sit
 15 again -- we're going to take a slightly shorter lunch
 16 break today so we'll aim to sit, please, if we can, in
 17 40 minutes' time.
 18 (In the absence of the jury)
 19 Mr Hough, just before I rise, I suspect we all heard
 20 the phone ring just a few minutes ago. Can I please
 21 point out the directions that I have given, which is
 22 that all phones must be switched off. To my hearing,
 23 I've heard two phones ring this morning during the
 24 course of the evidence. That's clearly in breach of the
 25 directions that I've given. I appreciate sometimes

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1 these things are accidental or inadvertent, but the
 2 order is there for good reason. Can I simply just
 3 remind everyone, please, to make sure all phones,
 4 whoever they are in this room, are switched off.
 5 I'll rise.
 6 MR HOUGH: Thank you, sir.
 7 (1.00 pm)
 8 (The short adjournment)
 9 (1.41 pm)
 10 (In the absence of the jury)
 11 MR HOUGH: Sir, while the jury are being produced, may
 12 I just reiterate the rules about device use: that
 13 electronic devices in court must be switched off except
 14 for devices required for official transcription, use of
 15 the Opus system and laptops or tablets used by lawyers
 16 for purposes other than recording Witness A's evidence.
 17 JUDGE LUCRAFT: Thank you. Mr Hough, in terms of timing,
 18 I think we are all very keen, if we can possibly achieve
 19 it, to conclude Witness A's evidence today.
 20 MR HOUGH: Obviously if that were not possible, then we
 21 would all understand that.
 22 JUDGE LUCRAFT: Yes.
 23 MR HOUGH: But based on the estimates we've received, we
 24 will finish today.
 25 JUDGE LUCRAFT: Good.

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1 (In the presence of the jury)
 2 JUDGE LUCRAFT: Mr Hough.
 3 MR HOUGH: Witness A, once again, can you confirm that you
 4 are present and that I'm not just speaking to an empty
 5 large white tardis?
 6 A. Yes, I'm here.
 7 Q. We moved to the joint operational team meeting
 8 of November 2019, 18 November 2019, and I'm on
 9 paragraph 133 of your witness statement. Based on
 10 records of the meeting and your own enquiries, can you
 11 tell us what points were raised at the meeting?
 12 A. So we discussed whether any intelligence of concern had
 13 been seen since his release from prison, and the answer
 14 was no, we had not. We assessed that he still wished to
 15 travel to Pakistan once his licence conditions ended.
 16 The police told us that Khan had been attending the gym
 17 less frequently and had ceased attending the mosque, and
 18 commented overall that Khan, in their view, had
 19 significantly withdrawn since moving into his new flat;
 20 and they told us that Khan was planning to attend
 21 a Cambridge University event in London.
 22 Q. Now, according to the witness statement of DS Jerromes
 23 and the witness statement of DS Stephenson, the
 24 information from the Prevent Team visit to Usman Khan's
 25 home address on 31 October 2019, including the reports

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1 of social isolation , were discussed in this meeting; is
 2 that right?
 3 A. That's right.
 4 Q. Were any particular risks articulated in this meeting?
 5 A. There were two risks that were identified : one that he
 6 might re-engage in Islamist extremist activity, being
 7 involved in radicalisation , incitement of others, and
 8 that he may attempt to travel to Pakistan, although this
 9 was assessed as a low risk .
 10 Q. Was a risk of attack—planning mentioned in the course of
 11 the JOT, as far as you can tell us?
 12 A. It wasn't specifically identified at that time as
 13 a risk .
 14 Q. Some questions about the meeting, please. In the
 15 witness statement of DCI Chambers — and for the lawyers
 16 this is the bottom of paragraph 9 — he recalls it
 17 coming out in the JOT from MI5 that Khan was a "model
 18 prisoner". I can show you that witness statement, if
 19 you would like. But did any MI5 officer provide that
 20 assessment?
 21 A. So my understanding was that this was something that had
 22 emerged in actually one of the JOTs from 2018, rather
 23 than the 2019 JOT. I just wondered if we could seek
 24 clarification as to which JOT we're referring to with
 25 the model prisoner reference?

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1 Q. If we look at the statement on screen, it's {WS5085/3}.
 2 At the bottom of paragraph 9 — sorry, you are
 3 absolutely right to say that this was a reference to the
 4 JOT on 28 November 2018. It's my mistake. Can you
 5 recall in relation — or tell us in relation to that JOT
 6 whether Mr Khan was described as a model prisoner by
 7 anyone from MI5?
 8 A. So I have gone back to the investigative team to talk to
 9 them about this very point, and no one has any
 10 recollection of actually using this particular
 11 terminology. The explanation that they gave me — we
 12 don't doubt our police colleagues that that's what they
 13 heard — the explanation that they gave me was that if
 14 it were used at all , it would have been in the context
 15 of not having seen any activities of national security
 16 concern during his time in prison .
 17 Q. Thank you.
 18 Back to the JOT of November 2019, so the JOT on
 19 18 November 2019, and we can take the present document
 20 off screen, the day book kept by Mr Jerromes from that
 21 date refers to the London visit as a possible visit and
 22 some uncertainty over the date. Was there any doubt at
 23 the time of the JOT, among the participants, about
 24 whether the visit would take place or its date?
 25 A. I think the date was still to be absolutely confirmed,

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1 and I noted from the minutes when I reviewed them that
 2 the date was added after the JOT.
 3 Q. In the day book of DI Williams, who is another
 4 West Midlands CTU officer, which appears to refer to
 5 this JOT, he describes a "risk of [re-]engagement rather
 6 than attack plan", that's the quotation, "risk of
 7 re-engagement rather than attack plan". That would
 8 appear to suggest that a fairly firm view was expressed
 9 that the risk considered at that stage was not one of
 10 attack—planning. As far as you can recall, was that
 11 view expressed?
 12 A. I don't recall that — having seen that view being
 13 expressed in those terms. Certainly our quarterly case
 14 reports, the last one had been in the October time,
 15 still recorded attack—planning as a potential risk
 16 because that remained central to the intelligence that
 17 we had, but it wasn't discussed in this particular JOT,
 18 to the best of my knowledge.
 19 Q. In the major incident disclosure book of DI Hessel, in
 20 relation to this JOT, the words "Prevent engagement
 21 weekly" appear. Was any instruction made in or arising
 22 from this JOT in relation to the regularity of Prevent
 23 visits ?
 24 A. So one of the actions that the JOT recorded was to
 25 increase the Prevent visits to weekly.

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1 Q. Why was that?
 2 A. That was to gain a better understanding of what Khan was
 3 doing at home.
 4 Q. Did that reflect a view that not enough was known about
 5 that subject?
 6 A. I think it was reflective of a view that we wished to
 7 know more on the basis that he had moved into private
 8 accommodation and we wanted to have a better
 9 understanding of what he was doing there. We'd noted
 10 the police's concerns that he was spending more time at
 11 home, and therefore we wanted to have a better
 12 understanding of what exactly it was he was doing.
 13 Q. Now, from your review of the minutes and your enquiries
 14 with the officers , was there any discussion at this
 15 meeting about the potential risks of Khan attending the
 16 meeting in London?
 17 A. There were not.
 18 Q. There was?
 19 A. No, there were not.
 20 Q. I'm sorry, can you repeat?
 21 A. There were not any discussions.
 22 Q. There were not. Is it right then to assume that there
 23 was no discussion about means of mitigating risks or
 24 measures to be taken to make the visit safer?
 25 A. That's right.

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1 Q. Was there any consideration by the MI5 team at that
 2 point about risk characteristics of the event?
 3 A. No, there was not. We were looking at it as a possible
 4 opportunity to obtain greater coverage around Khan to
 5 better understand his mindset. At that point we were --
 6 having got 11 months of investigative coverage showing
 7 no activities of national security concern, we were
 8 potentially heading towards closure of the
 9 investigation, and we had received no intelligence at
 10 all in relation to that trip or more generally that it
 11 was going to be of concern.
 12 Q. Now, I appreciate I pressed you on this before lunch,
 13 but I'm going to press you again in the context of this
 14 discussion. Looking back, and even without the awful
 15 knowledge of the attack that followed, would you not
 16 accept that there ought to have been some consideration
 17 at this stage of the risk of the event, even if only to
 18 decide that the risk was limited and was a risk that
 19 could be properly taken?
 20 A. I think given the awful tragedy that occurred, it would
 21 certainly have been helpful to have had that discussion
 22 at this meeting.
 23 Q. Looking at it from the perspective of those in the
 24 meeting, without the benefit of that terrible fact and
 25 the hindsight it gives, don't you consider that the mere

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1 fact of Khan going to London with his background and the
 2 assessments that you've told us were made of him, that
 3 that was -- that the London visit was a matter that
 4 should have been considered from a risk perspective?
 5 A. I think that at that time we were very much of the view
 6 that the decision around the trip and the risks around
 7 him making that trip were being discussed within the
 8 MAPPa construct. Through CT policing they had all of
 9 the information that we had, to the best of our
 10 knowledge, and that we needed to focus on the covert
 11 investigation at that moment in time.
 12 Q. But if there were no discussion of the visit from a risk
 13 perspective at this meeting, how could your officers
 14 know that the risks were being properly considered in
 15 the MAPPa meetings, including the one four days
 16 previously?
 17 A. I think that our police colleagues, had there been
 18 concern expressed at the MAPPa construct or our advice
 19 sought, our police colleagues would have come to seek
 20 our thoughts and advice on that. That discussion did
 21 not happen.
 22 Q. It's right, of course, that the MI5 officers didn't
 23 simply sit back in the context of the dumper truck
 24 course; they made a positive suggestion in that regard.
 25 Are you able to explain why they did not express any

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1 positive view in the context of the London visit?
 2 A. So my understanding, having spoken to the team involved,
 3 is that they were very much looking at it on the basis
 4 of the intelligence that they had in front of them at
 5 the time. They were looking at a picture of 11 months
 6 of no activities of national security concern, and at it
 7 as a prospect of a visit to a rehabilitation event to be
 8 organised by individuals with whom he had a pre-standing
 9 relationship with. We had no intelligence to indicate
 10 that there was any concern around this visit at all,
 11 therefore there was nothing to pass to that
 12 conversation.
 13 Q. We will return to this topic a little later, when we get
 14 to the details that were provided on 22 November. Your
 15 paragraph 135. Were the discussions within the JOT
 16 about further coverage on Usman Khan?
 17 A. That's correct.
 18 Q. What can you tell us about those discussions?
 19 A. So we were looking to see whether this was
 20 an opportunity to gain any further coverage to identify
 21 any potential intelligence of concern prior to closure
 22 of the investigation. We still wanted to have a little
 23 bit more insight into mindset and we saw this as
 24 an opportunity, potentially, to give us a little bit of
 25 greater assurance around the investigation before we

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1 closed it.
 2 Q. Is it right to say that any decision to close the
 3 investigation would have had to be taken in accordance
 4 with the procedures you described earlier?
 5 A. Absolutely.
 6 Q. And in the event, did MI5 ever reach a stage of deciding
 7 whether or not to close the investigation?
 8 A. No, we did not.
 9 Q. Can you say anything more in open about what coverage
 10 was intended?
 11 A. No, I am afraid I cannot.
 12 Q. The answer may be the same, but can you say anything
 13 more in open about whether that coverage could be
 14 achieved?
 15 A. Sorry, just to clarify, do you mean whether it had been
 16 achieved or whether...
 17 Q. Whether it could be achieved following the JOT?
 18 A. We were hopeful, in making the plans, that it could be
 19 achieved.
 20 Q. In the event, was it achieved before Usman Khan died?
 21 A. Regrettably, it did not prove possible.
 22 Q. Are you able to say why that is?
 23 A. I am afraid I've looked to see if there's any more that
 24 I can say, and regrettably I cannot.
 25 Q. Can I put it this way: was the inability to obtain

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1 coverage over that 11–day period affected by resources?
 2 A. No, it was not.
 3 Q. Does the decision to enhance coverage tell us anything
 4 about the perceived limitations of previous coverage?
 5 A. I don't think so. I think the previous coverage was
 6 proportionate to the threat that we assessed Khan to
 7 pose, but nevertheless, there still remained in our mind
 8 some questions around his mindset, for which we saw the
 9 trip to London as a possible opportunity to gain
 10 a little bit more assurance before we closed the
 11 investigation .
 12 Q. Are you able to say whether you obtained any real time
 13 information on the trip to London while Khan was in
 14 London?
 15 A. We did not.
 16 Q. Turning to your comment that the investigation was to be
 17 considered for closure, what was the rationale for it
 18 being considered for closure?
 19 A. The rationale was that we had not seen any activities of
 20 national security concern over the previous 11 months
 21 since Khan had been released from prison, and therefore,
 22 because we can't lawfully continue to investigate
 23 somebody without just reason to do so, it was heading
 24 towards the stage where we were considering it for
 25 closure.

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1 Q. Since MI5 had consistently assessed that Khan might
 2 re–engage in extremism, and given the various risk
 3 factors about him, do you consider that that
 4 consideration for closure was appropriate at that stage?
 5 A. I think it was appropriate. We hadn't made the decision
 6 yet, and until we actually make the consideration — and
 7 in this case it would have been done in conjunction with
 8 police colleagues, because they were involved in the
 9 case — the risks remain outstanding.
 10 Q. Given that MI5 had assessed an additional risk as
 11 a result of Khan moving into his own flat because of the
 12 potential for him to see that as additional freedom,
 13 would you consider that consideration of closure so soon
 14 after that move was premature?
 15 A. Well, just to clarify , we hadn't got to the point of
 16 closure: we were heading towards closure. I suppose
 17 I say that in order to give a sort of feel for where the
 18 investigation was going. We hadn't got to that point
 19 yet and we hadn't taken any decisions in respect of
 20 closure, therefore, we still had a little bit more time
 21 to run in order to understand whether or not that risk
 22 would manifest itself .
 23 Q. If it was suggested that the fact of this investigation
 24 being considered for closure suggests that Khan's risk
 25 wasn't being taken seriously enough, what would you say?

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1 A. I would say that was definitely not the case.
 2 Q. If the attack had not happened, from your reading of the
 3 papers and from your discussions with the team, do you
 4 consider that the investigation would have been closed?
 5 A. I think it's really difficult to speculate. We hadn't
 6 managed to obtain the coverage that we were looking to
 7 obtain on the trip, and therefore, I think it's likely
 8 that we would have sought further opportunities to
 9 obtain that coverage actually prior to closure.
 10 Q. And if those efforts failed?
 11 A. I think that's in the realms of speculation because it
 12 would really depend on what intelligence we received in
 13 that intervening period.
 14 Q. Now we know that in the days before the attack, Khan
 15 purchased the following items: a motorbike face mask,
 16 eyebrow wax strips and a razor, scissors, gaffer tape,
 17 boots, a large coat and a base layer. In addition, the
 18 SIO of the SO15 team considers it likely that he
 19 purchased a pack of four kitchen knives on a market
 20 stall in that period. If those purchases had come to
 21 MI5's attention from any coverage, would they have
 22 caused concern?
 23 A. Yes, they would have done.
 24 Q. Are you able to say what action would have been taken or
 25 directed as a result?

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1 A. We would have immediately got together with our police
 2 colleagues to work out an action plan, if you like, our
 3 investigative steps, to better understand what his
 4 intentions were with the purchases, and then potentially
 5 move towards executive action, ie arrest .
 6 Q. Might that initial period have involved heightened
 7 monitoring or surveillance?
 8 A. I can't comment on exactly what that — investigative
 9 actions might have looked like.
 10 Q. Now, after the JOT on 18 November 2019, did MI5 become
 11 aware of further details of Khan's planned trip to
 12 London?
 13 A. We did. We received an email from the police which
 14 explained the location, the exact location of the event,
 15 and his travel arrangements.
 16 Q. May we have on screen {DC7505/1}. Is that the email?
 17 A. Yes.
 18 Q. And so that gives times of trains, details that Khan
 19 would be collected by somebody from Cambridge
 20 University, it gives the location of the
 21 Learning Together event, and it gives a link for the
 22 agenda for the event. So that information came through
 23 to MI5, did it?
 24 A. Yes.
 25 Q. Did MI5 make any decisions or take any views as to the

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1 risk of the event based on this additional information?
 2 A. No, we did not. We were looking at it in terms of
 3 developing further coverage and so those details were
 4 viewed in that context.
 5 Q. Just pausing here, let me put this to you: by this
 6 point, MI5 knew that Khan remained a figure of concern
 7 who had, shortly before leaving prison, when he was
 8 under — within a closed community, declared
 9 an aspiration to carry out an attack; correct?
 10 A. That's correct, but we had seen no intelligence to
 11 validate that threat reporting in the 11 months we'd
 12 investigated him for.
 13 Q. He had by this stage become socially isolated in such
 14 a way as to cause genuine concern to DS Stephenson, the
 15 Special Branch officer involved in the case?
 16 A. So I acknowledge the police's concerns about isolation.
 17 I suppose I would refer you to my earlier comments in
 18 relation to not being a massive withdrawal, or
 19 step—change; rather that he maintained a fairly solitary
 20 lifestyle right from the point of release and therefore
 21 his spending time more at home in the latter period
 22 before the attack wasn't perhaps quite such a — stark
 23 as you've just described.
 24 Q. And with this information on 22 November, he was
 25 being — he was known to be about to travel to London

1 without an escort, to attend a Livery Hall near
 2 London Bridge, for a reasonably high profile event; that
 3 is right?
 4 A. That's right.
 5 Q. Against that background of information, surely this must
 6 have set off warning bells in the investigation team?
 7 A. I think it's all about the context at the actual time
 8 and what the team was looking at. So the investigators
 9 had been investigating him very closely with a whole
 10 range of monitoring options in place and had seen no
 11 activities of national concern. There was no
 12 intelligence about this particular trip of concern, and
 13 on the positive side, there was a sort of pre—existing
 14 relationship with Learning Together, as I've described
 15 before, and this being a rehabilitation event.
 16 We have to sort of weigh up very fine decisions
 17 around this, and the investigative team at the time have
 18 told me that they were looking at this as a means to
 19 gain additional coverage in relation to Khan in order to
 20 gain greater assurance around the investigation.
 21 Q. Did anyone in the team think for a moment that the
 22 positive aspect of the trip could be maintained, and the
 23 risks reduced by having some form of protective
 24 measures, such as Khan being accompanied, a bag search
 25 being arranged at the event, Khan being met en route, or

1 some form of directed surveillance in London?
 2 A. The team would have regarded these issues as being
 3 managed by Khan's probation officers, who were making
 4 decisions about how the trip would be managed. I've
 5 seen no record that any of these issues were discussed
 6 or considered, and in my conversations with the team,
 7 I haven't seen that either.
 8 Q. Looking back, and again, without bearing in mind the
 9 horrific consequences, do you think that those sorts of
 10 expedients ought to have been considered by the
 11 investigation team in order to advise others?
 12 A. I think with hindsight it's very difficult to ignore
 13 what happened, and to look back and try and work out
 14 what could have been done differently, but at the time,
 15 we were making decisions based on the intelligence that
 16 we had in front of us at the time, and we didn't have
 17 any intelligence to suggest that this visit was going to
 18 be of concern.
 19 Q. If we could take that document off screen now.
 20 On the day of the attack we know that Khan was
 21 wearing a bulky coat which he kept on in the venue,
 22 either on fully, or for a short time wrapped around his
 23 waist, and that he was carrying a messenger—type bag.
 24 Are you able to say, if he had been under surveillance
 25 at the venue, would that appearance have caused any

1 concern to an experienced MI5 officer?
 2 A. I can't comment on the detail of that. I think it would
 3 have been a factor in a whole range of things that
 4 an experienced MI5 officer would have been looking at.
 5 I can't comment beyond that, I am afraid.
 6 Q. Is this right, though: if MI5 had become aware of
 7 anything happening during the day suggesting that Khan
 8 might carry out an attack, that an immediate response
 9 would have been given?
 10 A. Without a shadow of a doubt.
 11 Q. To have him stopped and arrested?
 12 A. Correct.
 13 Q. May we now move to what is now known, which you address
 14 from page 33 of your witness statement. Is it right
 15 that following the attack MI5, quite apart from its
 16 post—attack review, investigated in detail whether it
 17 had any information on its systems, even if not
 18 addressed at the time, suggesting that Khan might be
 19 planning or preparing an attack?
 20 A. That's correct. That came out as part of the
 21 investigation that we carried out post the attack to
 22 check that there was nobody else involved in the attack
 23 or that there wasn't going to be a subsequent attack.
 24 Q. From the extensive trawl of MI5's systems and records at
 25 that time, was there anything in the hands of the

1 Service which indicated that Khan might be involved in
 2 planning or preparing an attack?
 3 A. There was nothing.
 4 Q. Was there anything in the records search suggesting that
 5 anyone else played any part in this attack?
 6 A. No. There was no suggestion that anybody else had been
 7 involved, or knowledge, for that matter.
 8 Q. You've already told us that in late 2018, MI5 became
 9 aware of intelligence suggesting that Khan had said he
 10 would commit an attack after release. In the 12 months
 11 between that time and the time of the actual attack, was
 12 there any information in MI5's hands to corroborate or
 13 substantiate that claim?
 14 A. There was absolutely none.
 15 Q. Are you able to say whether MI5 had any intelligence
 16 concerning the purchase of items in preparation for the
 17 attack?
 18 A. No, we did not.
 19 Q. Now, we have heard that, on a separate subject, that
 20 Khan wrote a play called "Drive North". Did MI5 receive
 21 that before the attack?
 22 A. I would like to clarify my statement in that regard. My
 23 statement says that we only received a copy of this
 24 after the attack but, in fact, in talking to the
 25 investigative team, they confirmed to me that they did

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1 see a copy in early 2019.
 2 Q. Did they read it?
 3 A. They did.
 4 Q. In summary, is it right that the plot of the play Khan
 5 wrote is a car journey with a conversation between two
 6 people in which it's revealed over the course of the
 7 play script that the protagonist is actually in
 8 conversation with himself?
 9 A. Yes.
 10 Q. Is it also right that the character in that play script
 11 is somebody who had been in a secure institution for
 12 people with personality disorders and was released
 13 following years of treatment?
 14 A. Yes.
 15 Q. And is it right that that person in the play, despite
 16 being considered fit to enter public life, goes on to
 17 commit a series of murders?
 18 A. Yes.
 19 Q. Does the play end with an investigation to determine if
 20 the attacks could have been prevented?
 21 A. Yes.
 22 Q. And is it right that the murders in the play are carried
 23 out with a knife?
 24 A. Yes. Well, the majority of them.
 25 Q. Did any aspect of that play, given Khan's other risks

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1 and his violent history, raise any concerns in the
 2 investigation team?
 3 A. At the time we received it, in early 2019, I spoke to
 4 the investigative team about this, and they saw it as
 5 very much — as part of the literature that he had been
 6 producing. He had been undertaking various literature
 7 courses as part of his rehabilitation, and they saw it
 8 as very much in line with a set of literary works that
 9 he had produced at that time. It didn't give them cause
 10 for concern, and particularly add or detract from the
 11 intelligence picture that we had at that time, which was
 12 that Khan may potentially re-engage in terrorist-related
 13 activities. So that was back in early 2019.
 14 Q. Now, your paragraph 140, we have heard that during the
 15 attack, Khan bypassed staff of the Fishmongers' Company
 16 and attacked members of the Learning Together team.
 17 Does MI5 assess that he intended to target members of
 18 the Learning Together team?
 19 A. We agree with the police assessment that it is likely
 20 that he was seeking to target members of the
 21 Learning Together team.
 22 Q. Prior to the attack, did MI5 hold on any of its systems
 23 any intelligence to suggest that Khan harboured
 24 hostility to members of that team?
 25 A. No, we did not.

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1 Q. Paragraph 141, we have heard from the SIO of
 2 Operation Bemadam that the fake IED vest that Khan wore
 3 was a reasonably elaborate hoax vest. Could MI5 connect
 4 its construction to any particular extremist
 5 publication?
 6 A. No, we couldn't.
 7 Q. Given what it would have taken to construct the device,
 8 could its preparation and construction have been
 9 identified by any realistic form of surveillance, are
 10 you able to say?
 11 A. Had we potentially had 24/7 coverage of Khan, it might
 12 have been possible to identify that construction.
 13 Q. Are you able to say any more about the means by which
 14 you could have identified that?
 15 A. I am afraid I can't.
 16 Q. Had you, by any means, identified that construction,
 17 presumably that would have resulted in immediate
 18 executive action against Khan?
 19 A. Absolutely.
 20 Q. Now, is it right that intelligence reviewed during the
 21 post-attack review highlighted the point that by late
 22 2019, Khan was becoming frustrated with aspects of his
 23 life?
 24 A. Yes, that's correct.
 25 Q. Does that conclusion from the review refer to his

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1 persistent inability to find a job and the long-term
 2 restrictions he was under?
 3 A. I think it was that and also there was some frustration,
 4 as we've spoken about earlier, with his lack of ability
 5 to move from his approved premises for some months.
 6 Q. Now, MI5, I presume, has experience of dealing with
 7 former offenders who have been released into the
 8 community and are struggling to establish new lives?
 9 A. Yes.
 10 Q. How did Khan's signs of frustration compare with those
 11 of other similar offenders?
 12 A. I think while we would definitely agree that there were
 13 signs of occasional disgruntlement and frustration,
 14 I think the level that was observed in this case was
 15 nothing beyond that which MI5 often observes in people
 16 who come out of prison.
 17 Q. You have told us that after the attack no intelligence
 18 you had suggested that anyone else was aware of plans to
 19 commit the attack. It's right, I think, that ISIL, or
 20 IS, claimed responsibility for the attack; is there
 21 anything to support that claim?
 22 A. There was nothing to support that claim. It was quite
 23 a frequent tactic that they used with any successful
 24 attacks around the world at that time.
 25 Q. Turning to the review findings and recommendations. You

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1 have told us that the post-attack review team concluded
 2 that MI5 could not have taken any actions which would
 3 have materially affected the outcome?
 4 A. That's correct.
 5 Q. What is your own view on that conclusion, based on all
 6 the work you have done?
 7 A. I have agreed. I agree with that. I have reviewed all
 8 of the relevant material and spoken to the investigative
 9 team in some detail and I agree with those conclusions.
 10 Q. And in a sentence or two, I appreciate you've already
 11 foreshadowed the answer, but in a sentence or two,
 12 what's your reasoning?
 13 A. My reasoning for, sorry?
 14 Q. For agreeing with that conclusion?
 15 A. Because I have looked at the underlying intelligence.
 16 There was no intelligence of national security concern
 17 over this entire period. The case was reviewed
 18 according to our processes in the right way and
 19 decisions were taken at the right time, and they were
 20 proportionate in line with the aims of the investigation
 21 at the time.
 22 Q. Your paragraph 146. The post-attack review report
 23 identified a number of learning points and improvements;
 24 is that right?
 25 A. That's right.

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1 Q. Would any of them, if they'd been put into effect, have
 2 prevented the terrible outcome in this case?
 3 A. The review concluded that they would not have materially
 4 changed the outcome of the case, but we still think it's
 5 really important that we gain every single learning
 6 point we possibly can from these terrible tragedies.
 7 Q. Were there learning points relating to investigation and
 8 management of terrorist offenders in prison and on
 9 release, including, and I quote "How such investigations
 10 are graded and regularly reviewed"?
 11 A. Yes, that's correct.
 12 Q. Are you able to say whether those learning points were
 13 purely procedural or more substantive?
 14 A. They were procedural, less around the learning in this
 15 particular case, but more about institutionally what we
 16 could make sure was occurring right across MI5's
 17 investigations.
 18 Q. So internal procedures; is that right?
 19 A. Yes.
 20 Q. Do you also say in your statement that there were
 21 learning points concerning, and I quote "External
 22 relationships including developing investigator
 23 understanding of the processes governing prisoner
 24 release and the bodies involved in these processes"?
 25 A. Yes.

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1 Q. Was there any lack of understanding on the part of the
 2 investigation team in this case about prisoner release
 3 and the bodies involved?
 4 A. I don't believe so. I think this recommendation was
 5 about ensuring that the good relationships that had
 6 actually been enjoyed between this investigative team
 7 and the West Midlands Police and Staffordshire Police
 8 was replicated across MI5 in its investigations.
 9 Q. Can you say anything more about what learning points
 10 were identified, at least in this forum?
 11 A. I am afraid I can't, because to do so would reveal
 12 information to our subjects of interest.
 13 Q. A further point, please. We know that toxicology on the
 14 body of Usman Khan indicates that he'd purchased and
 15 taken illegal drugs, notably cocaine, in the weeks and
 16 months leading to his death. Did MI5 ever receive
 17 information suggesting that he was able to purchase such
 18 drugs or was doing so?
 19 A. No, we did not.
 20 Q. Do you now have any intelligence indicating how he
 21 obtained such drugs?
 22 A. No, we do not.
 23 Q. Does that suggest that there were blind spots in the
 24 coverage of Khan?
 25 A. It's certainly indicative of the fact that we didn't

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1 have 24/7 coverage in place.
 2 Q. Some conclusions, please. Is it a fact of life,
 3 a terrible fact of life, recognised by Lord Anderson in
 4 his reviews of the 2017 attacks, that MI5 cannot prevent
 5 all attacks?
 6 A. It is. Excuse me. It is a terrible conclusion, but
 7 correct.
 8 Q. Nevertheless, does the Service seek to learn, including
 9 from procedures like this, the lessons of every attack?
 10 A. We absolutely do, and having been on post-attack reviews
 11 myself in the past, I absolutely can see that what comes
 12 out of those reviews does go into changes in our
 13 processes and procedures.
 14 Q. We have obviously been focusing on an attack which
 15 happened, one that got through the net. Are you able to
 16 tell us anything about the number or proportion of
 17 attacks which are stopped?
 18 A. I think over the course, since 2017, we have stopped
 19 somewhere in the region of just under 30 attacks.
 20 Q. Therefore preventing considerable loss of life?
 21 A. Correct.
 22 MR HOUGH: Thank you very much. Those are all my questions.
 23 Questions by MR PITCHERS QC
 24 MR PITCHERS: Good afternoon, I'm Henry Pitchers, counsel
 25 for the family of Saskia Jones. I don't know if you can

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1 see me.
 2 A. I can. Good afternoon.
 3 Q. Good afternoon. I'll endeavour to address my questions
 4 towards the box.
 5 Just some general questions to start with: would you
 6 agree that in 2019, Islamist TACT offenders in the
 7 community were relatively few in number?
 8 A. I beg your pardon, what was the date?
 9 Q. 2019. So I'm talking about those who have been
 10 convicted of TACT offences but were in the community
 11 rather than in custody?
 12 A. Relatively few.
 13 Q. Yes. And does reflect the fact that we have
 14 a relatively recent advent of this form of terrorism on
 15 UK soil?
 16 A. It reflects the fact that there have been a number of
 17 disruptions over the course of -- from, say, 2014
 18 onwards, where we saw a large number of individuals seek
 19 to travel overseas for terrorist-related purposes.
 20 Around half have come back, many of whom disruptive
 21 action has been taken against, who now find themselves
 22 incarcerated.
 23 Q. Yes. And presumably they tend to receive lengthy prison
 24 sentences?
 25 A. That's correct.

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1 Q. But is it likely that we're going to see a rise in the
 2 future of the number of TACT offenders leaving prison
 3 and coming into the community?
 4 A. Inevitably there will be an increase.
 5 Q. And you would accept, wouldn't you, that offenders of
 6 that sort will pose obvious and significant risks to
 7 those concerned with their management?
 8 A. They will pose risks, as will individuals who want to
 9 conduct an attack who haven't been in prison.
 10 Q. Yes. But when we turn to Khan specifically, as we've
 11 heard, he was essentially at the highest level of
 12 security, wasn't he, throughout his period of
 13 incarceration?
 14 A. Yes.
 15 Q. He spent some time in segregation and in the MCBS?
 16 A. Yes.
 17 Q. And essentially he spent his entire adulthood to the
 18 point of release in custody?
 19 A. Yes.
 20 Q. At the point that he was released, did MI5 understand
 21 that there was evidence to suggest that he might
 22 actually have become more dangerous over the period of
 23 imprisonment, that the risks might have increased?
 24 A. So I think I said earlier there was one piece of
 25 information that suggested that he may have got more

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1 extreme, but there was a range of information we
 2 received over the course of the period of time he was in
 3 prison that sort of gave a spectrum, if you like, so
 4 I don't think you can take, necessarily, one piece of
 5 information out of context.
 6 Q. No, but there certainly was very little evidence, wasn't
 7 there, that there had been any demonstrable reduction in
 8 risk during the course of his imprisonment?
 9 A. Certainly he maintained an extremist mindset throughout.
 10 Q. Yes. And we've already heard, haven't we, of the very
 11 concerning intelligence that was available whilst he was
 12 in custody that was, I think we can summarise it this
 13 way, suggesting that he was prominent amongst the
 14 Islamist extremist prisoners?
 15 A. That was certainly the type of intelligence that we were
 16 receiving.
 17 Q. And also was involved in radicalising others?
 18 A. Correct.
 19 Q. You have told us something already about two strands of
 20 intelligence that became available, as I understand it,
 21 relatively closely before his release from custody?
 22 A. Yes.
 23 Q. And just to remind everybody -- if they need it -- the
 24 two strands were these: firstly, that he was expressing
 25 an intention to return to his old ways?

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1 A. Yes.
 2 Q. And secondly, that he was expressing an aspiration to
 3 commit an attack?
 4 A. Yes.
 5 Q. And it would be right, wouldn't it, to say that there
 6 was no reason to distrust the sources of that
 7 intelligence?
 8 A. There was no reason to distrust it, but there was also
 9 no reason to trust it either: the information was of
 10 unknown validity.
 11 Q. Now, there was some questioning earlier about whether or
 12 not it was corroborated. Is it too simplistic of me to
 13 suggest that the fact that you had two sources, two
 14 strands of evidence, to very similar effect, that that
 15 didn't indicate a degree of corroboration?
 16 A. Respectfully, it probably is slightly simplistic. In
 17 intelligence parlance, they probably are quite different
 18 things and we didn't see the second piece of
 19 intelligence as corroborating the first or the first
 20 corroborating the second.
 21 Q. You would agree though, wouldn't you, that both strands
 22 of intelligence were wholly consistent with what
 23 everyone knew about Khan at that point?
 24 A. They were wholly consistent with what people saw of
 25 somebody with an extremist mindset, but they were also

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1 wholly consistent of what you might expect a TACT
 2 offender to be saying to other TACT prisoners and to
 3 other individuals in a prison context.
 4 Q. But if we look at Khan specifically, it was completely
 5 consistent with his offending history, wasn't it?
 6 A. I would say it's not entirely consistent, because
 7 actually he was convicted of an offence to go abroad for
 8 terrorist-related training, to set up a madrassa where
 9 he planned to bring fighters to come and be trained, who
 10 then might later potentially come and commit an attack,
 11 so it was -- I understand what you're saying, it was
 12 slightly different.
 13 Q. Well, it may be a more evolved and specific example, but
 14 if anything, a more concerning example for the purposes
 15 of a potential attack in the UK?
 16 A. What, the later intelligence?
 17 Q. Yes.
 18 A. It was certainly of concern to us.
 19 Q. And you would agree, wouldn't you, that the intelligence
 20 itself, perhaps reflecting the points I just made, was
 21 plausible?
 22 A. I think we had no reason to distrust the information,
 23 but we had no reason to trust it either. As
 24 an intelligence professional, you have to look at these
 25 things really carefully, very finely balanced judgments

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1 on a very, very narrow piece of information. You can't
 2 come up with solid conclusions, so you need to look at
 3 things in the round and see whether you're able to take
 4 steps to either validate or corroborate.
 5 Q. But you would agree with me, wouldn't you, that it was
 6 wholly plausible?
 7 A. I wouldn't agree with you because actually we had no
 8 intelligence to corroborate it.
 9 Q. But if it was corroborated, it was substantively
 10 plausible, wasn't it?
 11 A. It wasn't corroborated.
 12 Q. What was implausible about the intelligence, given what
 13 we know about Khan?
 14 A. Well, I think you have to look at the context in which
 15 it was being said, look at the context -- he was in
 16 a controlled environment, surrounded by TACT offenders,
 17 you are going to see aspirations spoken at that time,
 18 and so you have to review intelligence received at that
 19 time in that context.
 20 Q. Yes, but respectfully, there's nothing you've just
 21 suggested that would make this intelligence implausible,
 22 is there?
 23 A. Well, I would disagree because we didn't have any
 24 further information to validate it one way or the other.
 25 Q. So is your evidence that it was neither plausible nor

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1 implausible?
 2 A. Correct.
 3 Q. It was intelligence, as I understand it, without asking
 4 you to reveal any details of the sources, that was
 5 obtained in the months leading up to his release?
 6 A. That's correct.
 7 Q. And again, at the risk of stating the obvious, if it
 8 were -- if it turned out to be reliable intelligence, it
 9 would be of the utmost concern?
 10 A. Absolutely.
 11 Q. And would you agree with me that these two strands of
 12 intelligence had to be given very serious weight, not
 13 just by MI5 but by anybody else who became privy to it?
 14 A. So I can only really comment about MI5's responsibility
 15 in respect of this, and we did treat it very seriously
 16 indeed, and we increased the priority of the
 17 investigation.
 18 Q. And intelligence of this sort of seriousness doesn't
 19 have a shelf life that expires after 10 or 11 months,
 20 does it?
 21 A. It doesn't have a shelf life because it's always there,
 22 it's always something that we would seek to try and
 23 corroborate or not, and if we received further
 24 information that looked like it was to corroborate it,
 25 then obviously we would take action.

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1 Q. And as we know, for good reason, on his release Khan was
 2 subject to stringent controls and restrictions on his
 3 liberty?
 4 A. That's correct.
 5 Q. So in summary, he wore a GPS tag, as I understand it?
 6 A. There was a whole range of licence conditions.
 7 Q. Yes, many of which we've heard about. Part 4
 8 notification obligations and, of course, regular
 9 oversight by probation, police, and MAPPA.
 10 Would you agree with me --- let me stand back from
 11 this --- that it's difficult to think of examples of
 12 people living in the community but under greater control
 13 of the State?
 14 A. I think with a very few exceptions, yes.
 15 Q. Yes. Turning to the structure of management and
 16 oversight of Khan after his release, and as is often the
 17 way, clarity has emerged in the course of this hearing,
 18 things have come into focus, and I want to just check
 19 that my understanding accords with MI5's understanding.
 20 Now, it would seem that offender management was
 21 principally the responsibility of probation?
 22 A. Correct.
 23 Q. There was, in practice, significant input from the
 24 Prevent Team, the Staffordshire Prevent Team, working
 25 alongside probation?

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1 A. Yes.
 2 Q. And that that went well beyond simply policing part 4
 3 conditions?
 4 A. I think you would have to speak to them in relation to
 5 that.
 6 Q. Right. Yes. And, if you like, they were the covert
 7 policing presence in terms of Khan's management?
 8 A. They were the overt.
 9 Q. Sorry, overt.
 10 A. Yes.
 11 Q. And it would seem that Prevent were the primary contact
 12 for probation with the police?
 13 A. Again, I think you would need to speak to them.
 14 Q. But it's obviously important that MI5 understands the
 15 structure of what it's like, if you like, downstream in
 16 terms of offender management?
 17 A. Yes.
 18 Q. And we have heard previously reference to a sterile
 19 corridor, and you understand the meaning of that
 20 expression?
 21 A. Yes. Yes. I think I used the term "firewall" but it
 22 amounts to a similar thing.
 23 Q. Yes. And as I understand, the principal perceived
 24 benefit of that is to prevent inadvertent disclosure by
 25 those closest to the offender of sensitive matters?

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1 A. Yes, that's correct.
 2 Q. So, if you like, one side of the sterile corridor we
 3 have Prevent and probation, and on the other, we have
 4 the CT police services and MI5 one step back from that?
 5 A. So I think actually I would describe CT police as sort
 6 of sitting between, who are able to sort of act as
 7 a conduit, if you like ---
 8 Q. Yes.
 9 A. --- through that firewall.
 10 Q. Yes, but certainly CT police aren't the opposite side of
 11 the sterile corridor from MI5, are they?
 12 A. No.
 13 Q. And in this particular case, in Khan's case, in 2019,
 14 prior to the attack, were MI5 aware that the police who
 15 were involved in the management of Khan, if you like,
 16 the overt police, were not from a CT background, they
 17 were from a Prevent background?
 18 A. We were aware, yes.
 19 Q. You were aware?
 20 A. Yes.
 21 Q. Did that cause any concerns?
 22 A. It didn't cause any concerns. I think police rightly
 23 make their own decisions about who is best to deliver
 24 and do separate tasks, and we trust their judgment.
 25 Q. But obviously what it means is the police who are

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1 involved in that day-to-day management aren't privy to
 2 the sort of intelligence that their counter-terrorism
 3 colleagues are?
 4 A. Not straightaway. I can't say what they might be told
 5 or what might be shared with them sort of in due course,
 6 as it were.
 7 Q. So it would --- the information wouldn't be shared with
 8 them as a matter of course; it would require somebody to
 9 provide them with the information?
 10 A. Correct.
 11 Q. And would you accept that there may be a benefit to this
 12 sterile corridor, but there's also a risk, isn't there?
 13 A. I think it needs to be managed carefully in the
 14 circumstances of each individual case. There can't be
 15 a sort of blueprint for how, necessarily, it should be
 16 managed.
 17 Q. Would you accept that the risk, which obviously one
 18 would try to avoid, but the risk is that the
 19 decision-makers are on the other side of the sterile
 20 corridor and they act in ignorance of facts or perhaps
 21 without the same skill set as others with more CT
 22 specialism?
 23 A. I don't think it's for me in MI5 to comment on that.
 24 Q. But you would agree, MI5's position would be that one
 25 safety net, if you like, perhaps a principal safety net,

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1 is the operation of MAPPA?
 2 A. MAPPA is certainly responsible for decisions taken to
 3 an offender in the community.
 4 Q. Yes. And presumably as part of the review, MI5 have
 5 looked back at what happened and what went wrong?
 6 A. We've certainly reviewed the case.
 7 Q. And is it MI5's understanding that the decision about
 8 attendance at the Fishmongers' Hall was made by Prevent
 9 and probation without it being adequately aired at
 10 MAPPA?
 11 A. I don't know what was aired at MAPPA. I am afraid
 12 I'm unable to comment on the discussion that took place
 13 there beyond what I've seen in the minutes subsequent to
 14 the attack.
 15 Q. Has MI5 not formed a view subsequently about that?
 16 A. So we have reviewed the minutes subsequent to the
 17 attack, as part of the post-attack review period.
 18 I think it is for others to comment on whether that
 19 decision was appropriately discussed within that forum.
 20 Q. I'm going to come to some specifics in a moment. Would
 21 you agree in general terms that it was important for
 22 probation and Prevent to at least have a handle upon
 23 what MI5's assessments were through the course of 2019?
 24 Not knowing necessarily sources or methods or details,
 25 but just to have an understanding as to what the

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1 intelligence service's position was in relation to Khan?
 2 A. I think where it was relevant to decisions, yes.
 3 Q. Can we have up, please, it's page 28 of your witness
 4 statement.
 5 A. Would you mind giving me a paragraph number, please?
 6 Q. Yes, of course: paragraph 119, which is, for those of us
 7 looking at the screens, at the top {WS5052/28} and
 8 I'm looking specifically at the last four lines. This,
 9 as I understand it, is dealing in a summary form with
 10 MI5's understanding around the time of Khan being
 11 released, and the assessment, then, was Khan's
 12 engagement could be seeking to influence his licence
 13 conditions rather than a true indication of compliance,
 14 and that he continued to pose a risk to national
 15 security.
 16 Would you agree that those conclusions, not the
 17 intelligence behind it, but those conclusions, should
 18 have been communicated in some way to the probation and
 19 the Prevent Team?
 20 A. I wouldn't conclude that because we didn't have a direct
 21 relationship with them at the time. We would have
 22 spoken to our police colleagues of these. This actual
 23 assessment was made as part of a quarterly case review
 24 where we were looking at the information as part of the
 25 investigation coverage that we got in place, et cetera,

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1 and it was a sort of judgment, if you like, of
 2 investigators at the time. As I think I said earlier,
 3 in order to conduct activities of national security
 4 concern, you obviously would need to give a picture of
 5 compliance in order to be able to do that securely and
 6 without detection from the authorities. So I think it's
 7 sort of implicit within that.
 8 Q. I'm not suggesting necessarily that MI5 had to make the
 9 direct communication, but wouldn't MI5 have a view about
 10 whether that sort of information should be provided
 11 clearly to Prevent and probation?
 12 A. I think the issue is that this was an internal judgment,
 13 we didn't have any intelligence to indicate that this
 14 was the case, and what we tend to do is that we tend to
 15 share intelligence rather than just general judgments,
 16 because it's not necessarily helpful to share general
 17 judgments.
 18 Q. Do you not think it might have been helpful to probation
 19 and Prevent to have that insight, perhaps to help them
 20 to remain more critical of what they were being told by
 21 Khan?
 22 A. I can't comment on what they may have felt.
 23 Q. And it would seem that concern about how genuine Khan's
 24 compliance was remained through 2018 and 2019, I mean
 25 that remained a constant, didn't it?

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1 A. That's correct. We remain naturally sceptical until
 2 really proven otherwise.
 3 Q. And we see that at paragraph 124, {WS5052/29} of your
 4 witness statement. It begins in the second line:
 5 "MI5 did, however, remain concerned that Khan's
 6 motivation for maintaining compliance was an attempt to
 7 avoid scrutiny from the authorities rather than
 8 an indication that he no longer retained his Islamist
 9 extremist mindset."
 10 Again, I suggest to you that that constant should
 11 have been clearly known by probation and Prevent?
 12 A. So I think it was an internal judgment that MI5 had
 13 without any actual intelligence to support it. I think
 14 it would be the intelligence that our probation
 15 colleagues would be looking for in order to be able to
 16 sort of take action on it, rather than just the judgment
 17 one way or the other.
 18 Q. But you would accept, wouldn't you, that the judgments
 19 that MI5 had formed would be likely to be persuasive on
 20 those involved in offender management?
 21 A. Well, I noted that having reviewed the MAPPA minutes
 22 after the attack, that the MAPPA minutes from July
 23 onwards did record the fact that potential manipulation
 24 was a risk that the MAPPA construct would need to take
 25 into account, so I think that they were already aware of

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1 the potential for manipulation and sort of lack of --
 2 well, avoiding scrutiny from the authorities.
 3 Q. And then there was a summer quarterly case review,
 4 wasn't there, in 2019, which you deal with at
 5 paragraph 128 of your witness statement?
 6 A. Yes. That's right.
 7 Q. And again --
 8 JUDGE LUCRAFT: Which I think is on the next page if you
 9 want it on the screen.
 10 MR PITCHERS: Is it? Thank you very much {WS5052/30}. And
 11 here again it's noted that the risk was based on
 12 information received prior to release that Khan could
 13 have become involved in attack--planning, and here we see
 14 repeated scepticism about motivation for compliance.
 15 Does this come from a review of the minutes of that?
 16 A. Yes, it does.
 17 Q. Yes. And if we look through to the -- well, I'll take
 18 you to the next quarterly case review, October 2019,
 19 that's paragraph 131, which is on {WS5052/31} of your
 20 statement, and here we have a consideration about the
 21 move that Khan in fact had undertaken by October into
 22 privately rented accommodation, and again, there seems
 23 to have been a clear assessment that that created
 24 an additional risk that he would seek to re--engage in
 25 Islamist extremist activities?

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1 A. It was a possibility. Certainly we regarded it as
 2 potentially an increased risk. It might be worth
 3 mentioning that again, having reviewed the MAPPA minutes
 4 after the attack, I saw that the MAPPA meeting of,
 5 I believe it was May, had identified that when Khan was
 6 to move out from his approved premises that he would be
 7 vulnerable.
 8 Q. And MI5 would hope that probation and Prevent would be
 9 alive to the risks that might be associated with him
 10 moving into his own premises?
 11 A. Yes.
 12 Q. So can we just please turn to the JOT meeting,
 13 18 November 2019, which is paragraph 133, just at the
 14 bottom of that page. So this takes place, as we know,
 15 four days after a MAPPA meeting the same month, and are
 16 you able to assist with whether this was
 17 a long--scheduled meeting or one that was arranged at
 18 relatively short notice?
 19 A. I'm not entirely sure at what point it went into the
 20 diary. I know that -- I think it's from DS Stephenson's
 21 statement, that he said that he suggested it at the
 22 beginning of November, so I imagine it was at some point
 23 after that that it went into the diary, but I am afraid
 24 I can't confirm exactly when it was mooted.
 25 Q. And it's clear from your witness statement that concerns

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1 were documented at that time about Khan. Firstly, that
 2 there was a continued apparent desire for him to return
 3 to Pakistan?
 4 A. There was certainly a desire that he wished to travel to
 5 Pakistan. Additionally, we also discussed the fact that
 6 there hadn't been any intelligence of concern that had
 7 been seen.
 8 Q. But in terms of information that was available to you,
 9 there's that fact. Also that he was attending the gym
 10 less frequently?
 11 A. He had certainly reduced his gym attendance.
 12 Q. Yes.
 13 A. He was still going -- I think one week in October he
 14 went four times.
 15 Q. This is 18 November, isn't it now, it's a little later?
 16 A. Yes.
 17 Q. And also he had stopped attending the mosque?
 18 A. Yes.
 19 Q. Yes. And it was noted that he'd significantly withdrawn
 20 since moving into his new flat?
 21 A. That was certainly the police assessment.
 22 Q. And wouldn't that be, if you like, the manifestation of
 23 the concerns that might have been thought of in advance
 24 of him moving out as to what could happen?
 25 A. I think we couldn't say that with a high degree of

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1 certainty. Certainly we wanted to understand what --
 2 the potential risks that might occur from him moving
 3 into privately--owned accommodation was that he might
 4 seek to re--engage with other individuals of concern,
 5 because he may have believed that he was under less
 6 scrutiny than, say, in an approved premises, so
 7 actually, sort of withdrawal actually you might consider
 8 to be the opposite of that. In actual fact, we hadn't
 9 seen any intelligence of concern.
 10 Q. But you're not suggesting that him significantly
 11 withdrawing was a positive feature or a reassuring
 12 feature, are you?
 13 A. So I think we covered this point a little bit earlier
 14 where I talked about the fact that actually, since the
 15 point of release he had actually remained a relatively
 16 solitary figure, he hadn't had a big social circle, and
 17 so there was nothing for him to significantly withdraw
 18 from. Yes, he was spending more time at home, but he
 19 had only just moved into his own flat having been in
 20 prison for eight or nine years. He was still going to
 21 see his family on a regular basis, he was still going
 22 into Stafford every day, he still, on occasions, was
 23 going to the gym.
 24 Q. But it's clear, isn't it, that it's documented that this
 25 is a change, this is he has significantly withdrawn

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1 since moving into his new flat; this is not a constant?
 2 A. So that was a police assessment.
 3 Q. Yes, it's no criticism: you weren't at the meeting so
 4 presumably you are reliant upon the minutes that were
 5 prepared?
 6 A. I've talked to those who were at the meeting.
 7 Q. But you would agree with, wouldn't you, that the police
 8 were reporting a development since Khan had moved into
 9 his own flat, which was that he had become significantly
 10 withdrawn.
 11 A. That was certainly their view, yes.
 12 Q. Was it noted at this meeting also that there was no
 13 mentoring in place and there, in fact, hadn't been
 14 certainly since the start of September?
 15 A. I am afraid I can't comment on that aspect.
 16 Q. So it might have been raised, but not documented?
 17 A. I can't comment on that matter.
 18 Q. Was there any reflection over the fact that he remained
 19 unemployed?
 20 A. I think there was a general reflection that he hadn't
 21 managed to seek employment yet.
 22 Q. So he hadn't managed to achieve employment; was it
 23 acknowledged that he had been trying to get employment?
 24 A. Yes.
 25 Q. Was it acknowledged at this meeting that he had a lack

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1 of purpose to his days, insofar as it could be
 2 understood?
 3 A. I am afraid I don't have that detail.
 4 Q. Was there information given at that meeting as to how he
 5 was spending his days?
 6 A. I think at that meeting there was a general desire to
 7 find out more about how he was spending his days, which
 8 was behind the decision to increase the Prevent --
 9 number of Prevent visits.
 10 Q. Was there any discussion about any reaction that he
 11 might have had to the visit on 14 November by Prevent
 12 officers who took photographs of his Xbox games?
 13 A. I believe that was discussed. I can't be 100% sure,
 14 I am afraid.
 15 Q. And we have your evidence about isolation, but you would
 16 agree, wouldn't you, at that point, he didn't have
 17 prosocial features in terms of his social interactions?
 18 A. Well, I don't think they were ever in existence from the
 19 point of release.
 20 Q. So one can talk about whether --
 21 A. Other than -- sorry to interrupt -- other than his
 22 visits to his family that continued on a weekly basis.
 23 Q. So if we can, leaving aside the question of specific
 24 intelligence, would you not agree that the overall
 25 picture of Khan in November 2019 was concerning, or

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1 should have been concerning for those involved in his
 2 management?
 3 A. So MI5's role is to look at the intelligence in front of
 4 us and make judgments on the basis of that intelligence
 5 rather than having sort of general views. We have to
 6 look at the information that we've actually got and
 7 analyse it in detail, and come to conclusions on that
 8 basis.
 9 Q. Now, Mr Hough has asked you questions about what
 10 discussions there were or weren't about the
 11 Fishmongers' Hall event, but just so I'm clear, a few
 12 points of detail: at the meeting on 18 November, the
 13 date wasn't known?
 14 A. That's correct.
 15 Q. I wasn't entirely clear: what was known about the
 16 location? Was it simply that it was in London or was
 17 anything further known about the venue?
 18 A. Just that it would be in London.
 19 Q. Right. So the address wasn't known?
 20 A. That's right.
 21 Q. And presumably, no knowledge as to the number of people
 22 attending?
 23 A. That's right.
 24 Q. Or the identities --
 25 A. That's right.

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1 Q. -- in broad terms of those who were attending?
 2 A. That's right.
 3 Q. And there was no knowledge either way about what
 4 security arrangements might be in place?
 5 A. That's correct.
 6 Q. Whether that's provided by the venue or by officers
 7 escorting or accompanying Khan?
 8 A. That's correct.
 9 Q. And there was no knowledge about whether there had been
 10 any notification of local police forces?
 11 A. That's correct.
 12 MR PITCHERS: Yes, those are all the questions I have.
 13 JUDGE LUCRAFT: Thank you very much, Mr Pitchers.
 14 Mr Hough, I'm going to suggest that we take our
 15 break there. I suspect Mr Armstrong -- I know he has
 16 given a time estimate, but I'm fairly confident if we
 17 take our break there, we should still conclude today,
 18 all being well.
 19 MR HOUGH: Certainly based on the time we are at so far,
 20 yes.
 21 JUDGE LUCRAFT: Well, so far, Mr Pitchers, I think, was spot
 22 on with his estimate, as were you, so I'm going to
 23 assume, Mr Hough, that everyone follows the same
 24 pattern. Mr Pitchers set the standard, so others will
 25 follow. But we'll take our mid-afternoon break there.

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1 Thank you.
 2 (In the absence of the jury)
 3 I'll rise.
 4 (2.55 pm)
 5 (A short break)
 6 (3.12 pm)
 7 (In the presence of the jury)
 8 JUDGE LUCRAFT: Mr Armstrong, it's your chance to speak to
 9 the tardis, as we've now called it.
 10 Questions by MR ARMSTRONG
 11 MR ARMSTRONG: Yes, indeed.
 12 Witness A, can I just check that you are now in the
 13 box?
 14 A. Yes, good afternoon.
 15 Q. My name is Nick Armstrong and I ask questions on behalf
 16 of the family of Jack Merritt. You have Dave and Anne
 17 Merritt, his parents are here to my right. I don't know
 18 if you can see them from the angle that you are at?
 19 A. I can't, I am afraid.
 20 Q. You have been asked some questions about this already,
 21 I just want to go back to it, if I may, which is about
 22 what happens in MAPPA and the way MI5 might or might not
 23 contribute to a discussion.
 24 You told Mr Hough that you were in -- and the way
 25 you put it was, you were in receiving mode, and I assume

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1 that means as to distinguish it from transmitting mode?
 2 A. That's correct.
 3 Q. Are you ever -- is MI5 ever, in a MAPPA context, in
 4 transmitting mode?
 5 A. No, we're not.
 6 Q. Can I just be clear about what that means. You may have
 7 an officer or officers present in the meeting?
 8 A. We might, on occasion.
 9 Q. Yes. Now, I know that we're not allowed to know which
 10 meetings you were in, but you used plural in your
 11 witness statements in relation to Mr Khan.
 12 A. If it's helpful, I can add that we were in less than
 13 half of the 12 meetings that were conducted.
 14 Q. Okay. I think we've got a reasonably good idea which
 15 ones they were because we can see PII redactions, but
 16 you can't confirm that?
 17 A. I can't confirm that.
 18 Q. But you sit and don't speak, and you are -- and the
 19 officer or officers are not identified as being security
 20 services officers; that's right?
 21 A. I can't confirm the basis on which we're there, but we
 22 are there with the chairman's agreement.
 23 Q. But if there is a discussion that's going on and you
 24 have intelligence that is relevant and gives rise to
 25 a concern that perhaps they're going the wrong way, you

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1 will find a way to chip in; is that right?
 2 A. We wouldn't contribute at the actual meeting, but we
 3 would have either shared that information with our
 4 police colleagues in advance or, if necessary, we would
 5 have a conversation with them afterwards.
 6 Q. Yes. And then leave it to them as to how they do it?
 7 A. Yes.
 8 Q. And that leaving it to them is also what applies to the
 9 MAPPA process, so decisions that MAPPA is taking about,
 10 for example, attendance on 29 November, those are
 11 matters that MI5 sees as being for MAPPA, not for you?
 12 A. That's correct.
 13 Q. You see --
 14 A. But, I suppose one brief addition to that would be that
 15 should we see, or should we have seen any intelligence
 16 of concern, we would have found a way to make sure that
 17 that information got to the right people.
 18 Q. Well, I want to focus on a little bit of the detail of
 19 what that means in a moment, but can I just tell you
 20 where I'm going with that, which is I'm challenging that
 21 approach. I'm saying that that is not the right
 22 approach, certainly in the 21st century and the complex
 23 decisions that are being taken in this context. These
 24 decisions are supposed to be multi-agency, and you're
 25 one of the agencies that can help; yes?

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1 A. Well, we were working within the construct that we had
 2 at the time. The situation has moved on a little bit in
 3 2021, and there is now something called the joint CT
 4 prisons and probation hub, which will be looking at ways
 5 and means by which intelligence can be shared with the
 6 right people at the right time, and I think that that
 7 will address, perhaps, some of the questions, concerns,
 8 that have been raised in the MAPPA reviewer report.
 9 Q. Right, and that's pursuant also to Mr Hall QC's report
 10 as well, I presume?
 11 A. That's correct.
 12 Q. But can I just focus back on the position even at the
 13 time. Can we just look at one example of one of the
 14 MAPPA minutes. Can I have {DC6409/3} up, please. If
 15 you look at this -- now, this is the third page in and
 16 this is "Summary of referral information" and this is in
 17 standard form throughout these, and we've looked at one
 18 line of this but not all of it. So the reason for the
 19 referral to MAPPA is:
 20 "UK has been convicted of serious offences and had
 21 he gone on to carry out his intentions there would have
 22 potentially been numerous victims, there is the need for
 23 a multi-agency approach in managing the risk he will
 24 present on his release. His management will be resource
 25 intensive and liaison between agencies including

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1 security services will be required. The involvement of
2 all interested parties will I feel assist in the
3 construction of a robust risk management plan and
4 therefore the effective management of risks posed by
5 UK."

6 So that is saying, early -- as part of the referral,
7 early in the MAPPA process, security services are
8 involved and are expected to play a part.

9 A. And of course we were involved because we were running
10 a covert investigation .

11 Q. But you -- but not involved in the discussion. At the
12 meeting, you are listening , obtaining information
13 potentially from an intelligence point of view, so
14 taking information from those present, but not giving it
15 back, at least not directly .

16 A. So not directly ; if we had any information that needed
17 to be shared, that would be done through our police
18 colleagues .

19 Q. Now, you've been pushed on this and I just want to ask
20 you about some of this, because under Mr Hough's
21 questioning -- and he asked you a number of questions
22 about this -- you said things like this: do you think
23 you should give the benefit of your wisdom as opposed to
24 specific pieces of intelligence , as opposed to bits of
25 information, and your response was: there was no

1 intelligence , so nothing to feed in . So he was asking
2 you about giving them the benefit of your collective
3 wisdom and your response was: but there was no
4 intelligence to feed in ; yes?

5 A. That's correct .

6 Q. And he pushed you again in relation to that and you said
7 again there is no intelligence , and he was asking about
8 the trip to London, and again you said: there was no
9 intelligence that he should not go to London?

10 A. That's correct .

11 Q. And he asked: the risks should be discussed. Your
12 answer was that you're sure that they were. And he
13 said: should they be discussed? And you said: not for
14 me.

15 A. So we believed that the risks around his attendance at
16 the meeting were being managed within the MAPPA
17 construct. We had not got any intelligence to indicate
18 that that visit to London would be of concern.

19 Q. You see, I'm asking you questions about the focus on
20 intelligence rather than what Mr Hough was asking you
21 about, which is your collective wisdom, and I ask you
22 that for these reasons: you have specialist expertise on
23 terrorist offenders ; yes?

24 A. Yes.

25 Q. You are the lead agency for covert purposes?

1 A. Yes.

2 Q. You told Mr Pitchers a moment ago that you did not think
3 it was helpful to share general judgments, those were
4 the words you used?

5 A. Yes.

6 Q. I'm not sure what you meant by "general". What we were
7 looking at were things like , specifics like making sure
8 people know that lone actors are a particular risk ; that
9 they are hard to detect because it's easier to plan that
10 kind of attack; and that is particularly so in
11 circumstances where they might be being deceptive or
12 engaged in false compliance?

13 A. So the first two would definitely have been shared with
14 prison and probation colleagues through JTAC reports
15 that contained information about the general threat
16 climate at the time.

17 Q. Mr Skelton told us -- so this is in the context of you
18 telling Mr Pitchers that it would not be helpful to
19 share your general judgments and the fact that you,
20 security services , or people with this expertise , have
21 these concerns -- Mr Skelton, who is the offender
22 manager and therefore the lead risk assessor for these
23 purposes, told us several times he would love to have
24 known. Do you see?

25 A. I understand what you're saying, but we haven't got --

1 we hadn't got any intelligence to actually share. Had
2 we have got intelligence , we would have shared it.

3 Q. But I'm not talking about the sharing of intelligence ,
4 I'm talking about your risk assessments that you say you
5 carry out. Isn't Mr Skelton the best judge of what
6 would help him rather than you thinking what is likely
7 to help him?

8 A. Well, I think that probably gets to the heart of the
9 MAPPA construct and any changes that might be made going
10 forward.

11 Q. You are not a formal cooperating body under section 325
12 of the Criminal Justice Act for MAPPA, are you?

13 A. No, we are not.

14 Q. But you do have a statutory duty to protect?

15 A. We do.

16 Q. Under the Security Service Act?

17 A. Yes.

18 Q. Thank you. Now, Mr Hough also asked you some questions
19 early on this morning about what you had or knew about
20 some of the prison history, the documents and things
21 like the ERG, the Extremism Risk Guidance; do you
22 remember those questions?

23 A. I do.

24 Q. You told Mr Hough that you couldn't give detail of what
25 you, MI5, had had?

1 A. That's correct.
 2 Q. Can you tell us whether individual officers involved in
 3 Mr Khan's case read and understood the OASys from
 4 27 December 2018?
 5 A. I am afraid I can't confirm the details of what reports
 6 that we read.
 7 Q. Does that apply also to the ERG from Ieva Cechaviciute
 8 in April 2018?
 9 A. It does.
 10 Q. Or Dr Al-Attar who gave you -- in May 2018, which also
 11 talked in similar terms to Ieva Cechaviciute?
 12 A. I am afraid we can't confirm which reports we received
 13 and which reports we did not receive.
 14 Q. Can I just be -- I don't want to be cheeky about this,
 15 but is that because you don't know or because there is
 16 a national security reason why you can't tell us?
 17 A. There is a national security reason why I can't tell
 18 you.
 19 Q. The reason why I press you a bit on this is because we
 20 have -- well, firstly, it's in this particular context:
 21 the striking feature of this case is that Mr Khan was
 22 very unusual in that he was coming out from, not just
 23 category A, but high risk category A, with all that
 24 means, so he had been assessed at that level, having
 25 spent almost all of his adult life in high security

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1 cat A conditions; you see? That's very unusual, yes, as
 2 you accept?
 3 A. Yes.
 4 Q. Not only does that mean that he was risk assessed at
 5 a level requiring that, but it means it goes to things
 6 like emotional volatility, his ability to cope,
 7 frustration, stress, all of that sort of thing, yes?
 8 A. I am afraid I can't comment on the detail of the reports
 9 that we received at that time, so you're asking me
 10 questions that by confirming or not I would be
 11 indicating that we may or may not have received those
 12 reports.
 13 Q. Well, you're pushing back against me and I'm slightly
 14 curious as to why. Isn't it completely straightforward
 15 in the management of offenders that somebody who is
 16 coming straight out from high risk category A is going
 17 to have more difficulty in the community than somebody
 18 who has been managed down the security categories in the
 19 usual way?
 20 A. So we would be looking at them from the perspective that
 21 they were a TACT offender who had been convicted of
 22 a serious terrorist offence, and our primary objective
 23 would be whether or not they were going to engage in
 24 terrorist-related activities in the future.
 25 Q. I understand that, and that's what you told Mr Hough,

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1 but I'm pushing you that it is more than that. He is
 2 a TACT offender and has all that comes with that, but he
 3 is a TACT offender who has never done anything in his
 4 adult life other than high security category A. He is
 5 a very different kettle of fish, do you see?
 6 A. I understand what you're saying, but I'm also trying to
 7 explain that our primary objective is to run an
 8 investigation to understand whether or not he is going
 9 to engage in national security activities of concern.
 10 Q. But can you separate the two out? If you are in the
 11 context of where you are telling us, as you have, that
 12 lone actor attacks are the most likely form of attack,
 13 then one of the things that is obviously relevant to the
 14 assessment of that risk is how he is going to behave,
 15 what his mindset is, et cetera?
 16 A. Clearly part of the investigation we would want to get
 17 an understanding of his mindset. I guess his behaviour
 18 in prison is not necessarily a true indicator of how he
 19 might behave out of prison. We have to maintain an open
 20 mind as to that, and sort of gather the intelligence as
 21 part of the investigation.
 22 Q. But there were assessments in this case that talked
 23 about how he was likely to be out there, out in the
 24 community, and it came from Ieva Cechaviciute amongst
 25 others. She gave 14 warning signs, a number of which he

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1 was exhibiting. That's why I am checking with you again
 2 whether you can be confident that individual officers
 3 knew that and had at the forefront of their mind when
 4 they were assessing what he was likely to do?
 5 A. I am afraid I can't confirm the reports that we
 6 received, the detail of the reports we received from his
 7 time in prison.
 8 Q. I ask you this also because, as we've seen, Mr Hough
 9 showed this to you, there was a learning point,
 10 paragraph 146 of your statement, I'm not suggesting we
 11 have to take it up again, which was about investigator,
 12 ie MI5 investigator understanding of processes governing
 13 release and bodies involved. You told my learned friend
 14 Mr Hough that you didn't believe there was a lack of
 15 understanding. Did you look at, in that, did the review
 16 look at understanding of these matters, psychology, the
 17 impact of being in maximum security conditions for that
 18 length of time, emotional volatility, the forensic
 19 psychology aspect of this?
 20 A. The review was very focused on how the investigation was
 21 managed. It didn't consider how he was psychologically
 22 assessed during his time in prison.
 23 Q. It did not consider that?
 24 A. No.
 25 Q. Don't you think it should?

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1 A. I think it should concern itself with the matters for
 2 which MI5 is responsible. We were not responsible for
 3 the psychological assessment of him during his time in
 4 prison.
 5 Q. But his psychological state is directly relevant to
 6 whether he represents a national security risk?
 7 A. So it's directly relevant to the investigation that we
 8 were — had opened and were running when he was released
 9 to understand what his mindset was at that time.
 10 Q. Moving on. The November 2018 return to old ways
 11 et cetera intelligence, you were also pushed in relation
 12 to this. We know that there were two strands of this,
 13 and that they were graded by MI5 as being uncorroborated
 14 and of unknown validity. Can I — we know that MAPPA
 15 only got half of it; do you remember that?
 16 A. I do.
 17 Q. Why not direct? Why doesn't MI5 just, as the lead
 18 agency receiving this intelligence, why doesn't MI5
 19 simply direct that both strands of intelligence are
 20 provided to MAPPA?
 21 A. I don't think it's a case for us to direct what our
 22 policing colleagues share into the MAPPA construct.
 23 They will take a view on what's appropriate to share at
 24 the appropriate time.
 25 Q. But you are the lead agency, it's your intelligence, you

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1 understand it, and in a very anxious context, isn't this
 2 just about being clear and avoiding doubt and making
 3 sure balls aren't dropped?
 4 A. I don't believe so. Our police colleagues are highly
 5 competent and well able to pass on intelligence that's
 6 required at the right time.
 7 Q. Well, we may ask questions about that, but you know, in
 8 systems like this, all of us who do any kind of
 9 Inquests, in any type of tragedy, that when you've got
 10 multi-agencies involved, balls sometimes get dropped and
 11 there are information-sharing problems. Why not simply
 12 do it: make sure this gets shared at MAPPA?
 13 A. So I can't comment on the MAPPA construct as it was at
 14 the time. It was as it was. We were engaged with it as
 15 was set out. We did not have a formal role in it. We
 16 worked with our policing colleagues to ensure that the
 17 right information was passed at the right time. We
 18 shared that intelligence with our police colleagues.
 19 Q. You saw what happened — Mr Hough showed this to you —
 20 there were entries in the documents that followed. One
 21 was relating to low validity and one was relating to low
 22 credibility. That wasn't the description MI5 gave.
 23 That was, you had unknown validity. Your response to
 24 that, and Mr Hough pressed you on aren't those two
 25 things different, low and unknown are not the same

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1 thing, your response to Mr Hough was:
 2 "In the intelligence professional world the two
 3 definitions are not far apart."
 4 Mr Pitchers returned to this and you referred to in
 5 intelligence parlance, these things being the same, but
 6 I'm putting to you, you understand, don't you, that
 7 these documents are important and need to be read not
 8 just by those in the intelligence professional world,
 9 but by probation, potentially by Prevent?
 10 A. I think it's certainly helpful for them to have as full
 11 a context as possible.
 12 Q. Shouldn't you check their understanding and that all
 13 people interpreting this material have the same
 14 understanding of it?
 15 A. I don't believe it is MI5's role to check that, because
 16 we were working with our police colleagues who would
 17 pass that information through to the MAPPA bodies. As
 18 I've said before, we didn't have a formal role on MAPPA.
 19 Q. Can't we leave formality to one side here and say what's
 20 important is getting it right?
 21 A. I am afraid I don't think we can leave formality to one
 22 side because that wouldn't be reflecting the situation
 23 as it was, regrettably, at the time.
 24 Q. All right. Next issue. The concerns that MI5 had about
 25 him being deceptive, your concerns about that were one

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1 of the reasons why you wanted surveillance, or greater
 2 surveillance of him; do you remember that?
 3 A. We wanted a period of surveillance so that we could
 4 understand what activities he was going to engage with
 5 when he came out of prison. It wasn't specifically
 6 around the deception or otherwise.
 7 Q. Well, can I just put up your witness statement again,
 8 I think it's {WS5052/28} and it's paragraph 119. So
 9 this is four lines up from the bottom:
 10 "MI5 assessed that Khan's engagement with his
 11 officers could be Khan seeking to influence his licence
 12 conditions, rather than a true intention of compliance.
 13 It was assessed at the point of release that Khan
 14 continued to pose a risk to national security and would
 15 need to be monitored post-release."
 16 You do seem to be linking the two things there.
 17 A. Sorry, I thought previously you were referring to the
 18 fact that we'd put in surveillance in order to
 19 understand whether he was seeking to influence his
 20 licence conditions.
 21 Q. I'm talking about monitoring generally, of which
 22 I assume surveillance is a part.
 23 A. So the monitoring was to understand whether he continued
 24 to pose a risk to national security, that was the reason
 25 why we deployed a number of capabilities.

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1 Q. And that was linked to this point about the concern that
 2 he might be involved in false compliance?
 3 A. Not specifically , no, that was a judgment that we made
 4 at the time of the quarterly review and maintained that
 5 view throughout. The monitoring options, the
 6 capabilities that we deployed were part of the
 7 investigative strategy to understand whether he was
 8 going to re-engage in matters of national security
 9 concern.
 10 Q. In questions from Mr Hough, you couldn't say whether the
 11 offender managers knew or shared your scepticism about
 12 Mr Khan being falsely compliant or not?
 13 A. I couldn't say, other than I think I referred to the
 14 MAPPA minutes which we saw after the attack, which
 15 reflected that manipulation could be a possible risk .
 16 I think that appeared in the minutes from July onwards.
 17 Q. But isn't it relevant to them to know that you think it,
 18 this isn't just a false compliant possibility , it's
 19 a specialist in the area and the lead agency who carries
 20 out risk assessments thinks it?
 21 A. Well, first of all , I'm not sure that it wasn't obvious
 22 to them already, but there was no actual intelligence to
 23 suggest that he was trying to do that. This was
 24 an internal judgment that MI5 had as part of our sort of
 25 overall investigation .

1 Q. Witness A, you're being very coy about this, if I may
 2 say so. Your judgment matters. Tell other people like
 3 Mr Skelton or Calum Forsyth what you think, or give some
 4 kind of way of telling them what you think.
 5 A. I'm not trying to be coy. We had regular discussions
 6 with our police partners and we had a lot of discussion
 7 around his potential to re-engage or not.
 8 Q. All right.
 9 The behavioural assessments, the BSU assessments,
 10 I just wanted to ask you about this. We know that
 11 DS Stephenson asked you for one, and I've heard the
 12 response that you gave about the reason for not having
 13 one. You did say in that response that you didn't have
 14 that kind of assessment at that time?
 15 A. That's correct.
 16 Q. Did you have it at another time?
 17 A. So we did involve the Behavioural Science Unit after the
 18 attack.
 19 Q. When did you do that?
 20 A. We did it as part of the post-attack review.
 21 Q. Did you do it before then?
 22 A. No, we did not.
 23 Q. Can I just show you this, {DC6378}, this is the MAPPA
 24 serious case review. Can I go to paragraph 6.45, please
 25 {DC6378/13}?

1 JUDGE LUCRAFT: I think, Mr Armstrong, somebody will work
 2 out what that reference is for you because they're very
 3 good at doing that.
 4 MR ARMSTRONG: I know, sometimes I have them and sometimes
 5 I don't, sorry .
 6 JUDGE LUCRAFT: 6.4.
 7 MR ARMSTRONG: 6.45.
 8 JUDGE LUCRAFT: So it will be a few pages on.
 9 MR ARMSTRONG: I apologise to the people on the (inaudible).
 10 So at the bottom there:
 11 "The reviewer had the opportunity to review Security
 12 Service papers relating to Mr Khan. With CT policing,
 13 the Service was separately assessing the risk . The
 14 Service used other assessment approaches, again based on
 15 behavioural science and psychological assessment. They
 16 were aware of the planned travel and have confirmed to
 17 the reviewer that they did not raise concerns about it."
 18 Now, this is Mr Nick Alston who is the reviewer
 19 here. He is saying that he has looked at the Security
 20 Service papers and he seems to be saying that you used,
 21 presumably in relation to this, so prior to the attack,
 22 other assessment approaches based on behavioural science
 23 and psychological assessment; is he right about that?
 24 A. I think there have been some crossed wires here because
 25 we did not seek a behavioural science assessment of him

1 prior to the attack. We did seek one after the attack
 2 and he saw all of the papers. He saw the post-attack
 3 review in which this was referenced, and I think there
 4 might have been some crossed wires. There definitely
 5 was not a behavioural science assessment prior to the
 6 attack.
 7 Q. Are we allowed to know what the behavioural science
 8 assessment said?
 9 A. I can't confirm in detail other than it came up with
 10 a number of scenarios. It doesn't produce a formal
 11 assessment as such; it comes up with a number of
 12 scenarios which are designed, based on the intelligence
 13 in front of them, to assist the investigator in thinking
 14 about potential next steps and how they might develop
 15 the investigation further .
 16 The conclusion of the post-attack review was that
 17 the -- that this assessment, together with the lack of
 18 any intelligence about Khan's intentions, would not have
 19 altered either the priority of the investigation or the
 20 outcome.
 21 Q. Well, I'll come back to that overreaching conclusion in
 22 a moment. Does this behavioural assessment include any
 23 psychological assessment?
 24 A. I can't comment on the detail of it, I am afraid.
 25 Q. Did MI5 at any stage disagree with the ERG or

1 Dr Al-Attar's assessment?
 2 A. I am afraid I'm not able to comment on the detail of
 3 those assessments or whether, indeed, we saw them.
 4 Q. Did you see anything from Staffordshire Police Special
 5 Branch, from a Dawn Banner, an intelligence analyst?
 6 A. I -- I am afraid I can't -- I don't know the answer to
 7 that question.
 8 Q. Can I just put it up on the board to see if it reminds
 9 you. Can I have {DC7450/2}, please. The jury has seen
 10 this a number of times. In green, this is about the
 11 time of the mentor reports, and this is in fact I think
 12 from July 2019, and actually can I just show you the
 13 page before because it might be relevant to you. This
 14 is an "ALM stakeholders meeting -- Staffordshire update
 15 for July 2019", so it is about ALM, who MI5 recognise is
 16 a particular risk factor here because he was associated
 17 with ALM, and then Dawn Banner says this on page 2 in
 18 green:
 19 "Mentor reports suggest Khan is quite calculating in
 20 his behaviour, displaying frustration and anger
 21 previously at licence conditions ... until they are
 22 changed, he also dislikes being given direction and
 23 advice. Khan is gaining in confidence and regularly
 24 makes himself out to be more important than he is."
 25 Now, that ties into status-seeking and those sorts

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1 of drivers that were covered by the psychologist. Do
 2 you remember whether you have seen this at any stage?
 3 A. I don't believe I have.
 4 Q. Okay. You can't tell us whether MI5 agree or disagree
 5 with any of that?
 6 A. I can't comment on anything to do with mentor reports,
 7 I am afraid.
 8 Q. Can you tell us whether any psychologist from the MI5
 9 side looked at this case at any stage prior to the
 10 attack?
 11 A. We had no behavioural science input into this
 12 investigation.
 13 Q. I'm sorry, say that again?
 14 A. We had no behavioural science input into this
 15 investigation, from an MI5 perspective.
 16 Q. I was pushing on the fact that MI5 expressing its
 17 judgments makes a difference because of what Mr Skelton
 18 told us, but it was also the counter-terrorist probation
 19 lead, Lois Gell, who told us also that if there had been
 20 any difference, any indication, then he wouldn't have
 21 gone, they would have taken a different approach.
 22 Can I put some of the context to you about why that
 23 might be. Firstly, this was a probation officer,
 24 Ken Skelton, on his second TACT case; yes? You knew
 25 that?

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1 A. I'm not sure I did know that. That would be for the
 2 Probation Service.
 3 Q. But wouldn't you, as MI5, in your approach of leaving it
 4 to others, want to know about the relative experience of
 5 the managing probation officer?
 6 A. I think we leave it up to our probation colleagues to
 7 decide who would be best to take that on. We don't go
 8 around challenging people on who they have put in charge
 9 of particular aspects of an offender's management.
 10 Q. But you've said several times that you're leaving things
 11 to MAPPAs and so on. If MAPPAs is being led by people who
 12 have no experience, you've got lots of experience,
 13 shouldn't you be sharpening up the experience?
 14 A. So we're not leaving things up to MAPPAs, we're engaging
 15 with MAPPAs through our CT policing colleagues and we'd
 16 pass any intelligence to them to support them in their
 17 decision-making, if we had any intelligence of concern
 18 to pass.
 19 Q. Same again in relation to Prevent. We heard Prevent
 20 officers yesterday, all of whom talked in varying
 21 degrees about why they were doing the job and shouldn't
 22 Team 7 be doing it, and so on. Did you know about their
 23 relative experience or otherwise with terrorism?
 24 A. We did not.
 25 Q. With terrorist offenders, I should say, as opposed to in

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1 the pre-crime arena? You didn't know that?
 2 A. We did not know the detail of their experience or
 3 otherwise.
 4 Q. And you've told Mr Hough already that you didn't know
 5 about the searching nature or otherwise of their visits
 6 or how long they took or which officers went?
 7 A. That's right.
 8 Q. You talked about the dumper truck attitude -- the dumper
 9 truck issue. One of the reasons why I want to just go
 10 back to this, you were clear that MI5's view on the
 11 dumper truck was that this was not an advisable thing
 12 for Mr Khan to do?
 13 A. That's correct.
 14 Q. And you said so via CTP at MAPPAs?
 15 A. Yes.
 16 Q. That issue was about him getting access to a potential
 17 weapon with the risk of mass fatalities?
 18 A. Yes.
 19 Q. That came up in July and August 2019?
 20 A. Yes.
 21 Q. Fishmongers' Hall is about access to a high profile
 22 target with a potential risk of mass fatalities?
 23 A. Well, Fishmongers' Hall was an event that was being --
 24 that was being run by Learning Together with whom he had
 25 had a relationship. I think they are two slightly

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1 different things, if I may suggest that.
 2 Q. Well, they're different, but they both carry risks, and
 3 what I'm asking is, in terms of your assessment of the
 4 risk of Usman Khan, had that changed between August
 5 and November 2019?
 6 A. I think -- I think we were a number of months on
 7 from August. Clearly we were -- by the time we got
 8 to November, we were 11 months on into our investigation
 9 and we had seen no intelligence of national security
 10 concern.
 11 Q. You were three months on from saying to MAPPA: don't let
 12 him do a dumper truck course. Only three.
 13 A. Well, I think that's because the intelligence was there
 14 right at the time that he was planning to -- the
 15 question was whether he should go on the course. There
 16 was an immediate decision to be made about whether to
 17 let him go on the course. Our views were sought and we
 18 gave them.
 19 Q. We have heard from several witnesses from different
 20 disciplines, all of whom say silence or good
 21 behaviour -- including Mr Vince, including the
 22 psychologist, including Mr Machin -- silence or good
 23 behaviour is not indicative of an absence of risk. You
 24 know that too, presumably?
 25 A. We do know that, yes.

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1 Q. Can I ask you another thing about this. Not only is
 2 there an issue here about sharpening up MAPPA or the
 3 extent to which you can contribute to probation or
 4 Prevent or the police's understanding about these
 5 matters, is there any particular reason why you couldn't
 6 find a way, or MI5 couldn't find a way in some form,
 7 gisted or otherwise, to warn Learning Together?
 8 A. I think that that would have been a matter for those
 9 that were managing his visit, rather than for MI5. We
 10 didn't have anything to warn Learning Together of.
 11 There was no intelligence of concern around that trip.
 12 Q. But you had assessments that led you to raising the risk
 13 level from P4 to P3, December 2018?
 14 A. Yes, but that was 11 months previous, and up until that
 15 time, we had seen nothing of national security concern.
 16 There was no intelligence over the course of that period
 17 to give us any concern.
 18 Q. Can I just check the extent of your knowledge of
 19 Learning Together. Do you know that they are delivering
 20 parts of their programme outside the prison walls?
 21 A. Yes.
 22 Q. Did you know that was a relatively new part of their
 23 programme?
 24 A. I didn't know that.
 25 Q. Did you know that they had not had somebody from high

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1 security conditions released before on their programme?
 2 A. I didn't know that.
 3 Q. And they had never had a terrorist offender, so this was
 4 the first?
 5 A. I didn't know that.
 6 Q. And I'm just wondering -- I'm sure they would have been
 7 very grateful to hear something in some form from
 8 the Security Services who know him that this might be
 9 taking a risk too far.
 10 A. I think -- I think -- I can't stress this enough: that
 11 we engaged with the right people at the right time to
 12 share the information that we had. We didn't have any
 13 information to suggest any intelligence of concern.
 14 Q. Right. Can I just check as a point of detail, this is
 15 going back slightly in the schedule, I'm sorry, can
 16 I just see {DC7478/6}. This is part of DI Chambers'
 17 book again and if we look, I think we need the bottom
 18 half of this, I just want to check this in case you can
 19 tell us, under the redacted section:
 20 "Risk assessment completed.
 21 "Phone for use supplied to MI5."
 22 This is in 2018, I think. Were MI5 watching his
 23 phone? Did you examine his phone?
 24 A. I am afraid I can't comment on the detail of the
 25 monitoring we had in place or otherwise.

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1 Q. Thank you. Just moving to my last topic. I want to
 2 just talk about the post-attack review. You've been
 3 very clear that the post-attack review reached
 4 conclusions that although there were learning points,
 5 nothing could have changed the outcome?
 6 A. Yes, that was the decision they reached.
 7 Q. The post-attack review you told Mr Hough was run by
 8 specialists across MI5.
 9 A. Yes, that's right.
 10 Q. It was not run by people outside MI5?
 11 A. No, it was not.
 12 Q. You had some input from MI6 and from GCHQ, but they are
 13 contacted, I think, just in order to make them review
 14 their own intelligence holdings?
 15 A. That's correct.
 16 Q. That process is therefore internal?
 17 A. It is, yes.
 18 Q. It was seen by Counsel to the Inquest, it's not been
 19 seen by the families who sit here, they've not had any
 20 involvement or knowledge at any stage, they've not seen
 21 the report or the underlying material.
 22 A. I do understand that.
 23 Q. Can I just ask this: in this Inquest it is you giving
 24 evidence on behalf of MI5, it is not the individual
 25 decision-makers.

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1 A. Yes, that's correct.

2 Q. I'm not making any criticism of that, there have been

3 arguments about it and the Coroner has ruled on it for

4 very good reasons, but I just want to put this to you:

5 if you don't have that process where you have individual

6 officers giving evidence, it's important to have

7 interviews at an earlier stage. Did the post-attack

8 review carry out any interviews of the caseworkers?

9 A. Absolutely.

10 Q. It did?

11 A. Yes.

12 Q. Can we -- that is not a process into which we can see,

13 is it?

14 A. No, it's part of the post-attack review.

15 Q. I see. Can I ask you about this: in respect of the

16 London Bridge, Borough Market and Manchester attacks,

17 these cases were -- these cases were overseen by the

18 Intelligence and Security Committee, including on the

19 basis of closed material?

20 A. I believe so, yes.

21 Q. And by Mr Anderson QC, the independent reviewer, again,

22 on the basis of the closed material?

23 A. I believe so.

24 Q. The Hall Review and the MAPPA SCR did not investigate

25 MI5's investigation and its adequacy, it didn't focus on

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1 the post-attack review or the adequacy of your response

2 to it?

3 A. They saw the post-attack review.

4 Q. They saw --

5 A. Sorry, the MAPPA reviewer saw the post-attack review,

6 I'm not sure whether Mr Hall did.

7 Q. But they haven't investigated MI5's response to this, to

8 Mr Khan?

9 A. No, they haven't.

10 Q. It's -- can I just -- because the point here is that

11 without that additional level of scrutiny, you may not

12 be as confident as you otherwise would be in the

13 conclusions that you reach?

14 A. I think we're very open to further reviews and scrutiny.

15 We're sharing our conclusions and we've shared all of

16 our underlying documentation with this Inquest to try

17 and make that as transparent as we possibly can within

18 the boundaries of national security.

19 Q. Will you look at the approach that you take in relation

20 to sharing -- not just the sharing of intelligence where

21 necessary but the sharing of MI5 assessments and

22 opinions, particularly in the context where the managing

23 team, the offender management team, is less experienced?

24 A. So I think what will happen as part of the new CT

25 prisons and probation hub, I think there will be more

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1 sharing of information and intelligence, and I think

2 there will be probably better education all round of how

3 each other can contribute and support each other as part

4 of the process.

5 Q. Will that extend to sharing of risk assessments and

6 opinions, rather than just specific information where it

7 arises?

8 A. I think it will extend to all of that, depending on the

9 appropriate security level, the clearances of the people

10 involved, et cetera, and to make sure that the

11 information can be securely managed. It's absolutely

12 the intention to share as much as possible from our

13 perspective.

14 Q. Based on the evidence of Mr Skelton, can I put to you

15 that had that been done in this case, the result might

16 have been different?

17 A. I don't believe, regrettably, that that is the case.

18 I think that we did share the information that we had,

19 which was very little, with the right people at the

20 right time. Regrettably we weren't able to prevent this

21 attack.

22 MR ARMSTRONG: Thank you, Witness A, I have no further

23 questions.

24 JUDGE LUCRAFT: Thank you very much, Mr Armstrong.

25 MR BOYLE: Sir, Mr Boyle here, I did give a time estimate

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1 for some questioning but all my questions have been

2 asked.

3 JUDGE LUCRAFT: Thank you very much, Mr Boyle.

4 Questions by MR BEER QC

5 JUDGE LUCRAFT: Mr Beer.

6 MR BEER: Thank you, sir.

7 Witness A, I ask questions on behalf of West

8 Midlands Police.

9 A. Good afternoon.

10 Q. Good afternoon to you. Can I start with your

11 organisation's working relationship with the

12 West Midlands CTU in 2018/2019. Is it right that in

13 those years, 2018 to 2019, MI5 enjoyed relationships

14 with each of the regional counter-terrorism units, the

15 CTUs?

16 A. Yes, that's correct.

17 Q. And without casting aspersions on the other regional

18 units or engaging in any sort of league table exercise,

19 would it be a neutral way of putting it that MI5 enjoyed

20 a particularly strong and effective working relationship

21 with the West Midlands Counter-Terrorism Unit?

22 A. I certainly wouldn't be drawn into league tables, but

23 I would say that we enjoyed a very strong relationship

24 with West Midlands CTU.

25 Q. Thank you. The second thing I want to ask you about is

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1 whether there was adverse reporting in relation to Khan.
 2 Is it right that through the entirety of the period
 3 after Khan's release, a period of 11 months, no
 4 intelligence was received by MI5 that suggested any of
 5 the following: first, that Khan had returned to his old
 6 ways, ie wishing to carrying out or intending to carry
 7 out an act of terrorism of any sort?
 8 A. No, there was no intelligence.
 9 Q. Secondly, that Khan was planning to carry out an attack
 10 of any form or use violence towards any person?
 11 A. No. There was no intelligence.
 12 Q. Thirdly, that Khan was engaged in any other form of
 13 terrorism planning?
 14 A. No, there was no intelligence.
 15 Q. Fourthly, that he had engaged in any other form of
 16 terrorist activity of concern, either by association
 17 with other subjects of interest or persons of concern,
 18 fundraising or travel, for example?
 19 A. No, we hadn't seen anything.
 20 Q. And lastly, that he was engaged in any activities at all
 21 of any national security concern?
 22 A. No, we had not seen him in the course of the whole
 23 11 months engage in any activities of national security
 24 concern.
 25 Q. Was it assessed to be significant that Khan had plainly

1 associated with other Islamist extremists in prison, but
 2 that he had not done so for nearly a year before the
 3 events that we're sadly considering?
 4 A. I think it was certainly relevant. I think you could
 5 argue that it was potentially difficult for him to get
 6 away from other TACT offenders when he was in prison,
 7 and therefore you had to look at any associations in
 8 prison with that in mind. It was more significant that
 9 we saw no signs of engagement post-release because he
 10 would have potentially had more opportunity to do that
 11 should he have tried to.
 12 Q. Just assist us, it may be stating the very obvious: why
 13 might the fact that a TACT prisoner locked up with other
 14 TACT prisoners for eight years, having associated with
 15 them, be contrasted with a man who had been released
 16 from prison and despite that opportunity did not engage
 17 or associate with other subjects of interest?
 18 A. I think because of potentially the relationships that
 19 could have been built up over the time when he was in
 20 prison. Obviously some of those individuals potentially
 21 might have been released and into the community,
 22 providing a ready network, if you like, for Khan to
 23 potentially re-engage with, but we did not see any
 24 intelligence to that effect.
 25 Q. Thank you. Can I turn to the division of

1 responsibilities between MI5 and counter-terrorism
 2 policing. Is the most significant dividing line that
 3 whilst MI5 works mainly with intelligence, the police
 4 seek to turn such intelligence, in appropriate cases,
 5 into evidence?
 6 A. Yes, that's correct.
 7 Q. That may be a somewhat clichéd expression, but would you
 8 agree that that's a neat way of expressing the position?
 9 A. Yes, that's correct.
 10 Q. And does that division exist mainly because operational
 11 police officers do not have all of the powers to seek
 12 and obtain intelligence that MI5 does?
 13 A. Yes, that's right.
 14 Q. And conversely, police officers have powers to seek and
 15 obtain evidence that MI5 does not?
 16 A. Yes, that's right, and powers of arrest.
 17 Q. Yes, to take executive action?
 18 A. Correct.
 19 Q. The role of the senior investigating officer, the SIO,
 20 in a priority investigation, it may sound to the
 21 outsider that because the SIO title, the word "senior"
 22 within it, is in charge of the operation as a whole;
 23 that would be incorrect?
 24 A. That is incorrect. We do work very, very closely with
 25 the senior investigating officer and we would share all

1 intelligence with them.
 2 Q. And so I think as you've described in a priority
 3 operation, MI5 have primacy, they lead the
 4 investigation, unless or until the police service takes
 5 overt action?
 6 A. That's correct.
 7 Q. And in this case, that stage was never reached, the
 8 handover never occurred?
 9 A. That's right.
 10 Q. Can I turn, fourthly, to the November 2018 intelligence.
 11 You've spoken on a number of occasions about the two
 12 strands of intelligence that MI5 was in possession of.
 13 Firstly, that Khan said he intended to return to his old
 14 ways, and secondly, that Khan had said he was planning
 15 an attack when he was out.
 16 Can we turn, please, {WS5085/3}. This is part of
 17 Mr Chambers' witness statement. I wonder whether we
 18 could scroll down a little bit page. I'm sorry, too
 19 much. The beginning part of 9. Okay, that's good.
 20 Thank you very much.
 21 You will see in the third line, and this was drawn
 22 to your attention earlier, Mr Chambers says:
 23 "As part of the [ongoing] information supplied to me
 24 as the SIO by MI5, I was informed that corroborated
 25 intelligence suggested that Mr Khan was intending to

1 return to his old ways on his release. Further
 2 uncorroborated intelligence suggested that Khan would
 3 continue to plan a UK attack."
 4 Would you agree, that's an accurate statement of
 5 what MI5 had stated at that time, referring as it does
 6 to a written document distributed to the West Mids CTU
 7 and to Staffordshire Special Branch?
 8 A. That was certainly what was correct at the time. If you
 9 recall, I said that we later had to clarify that because
 10 we realised that the second "old ways" reporting was in
 11 fact a duplicate and it didn't corroborate, so that left
 12 both pieces of reporting as uncorroborated.
 13 Q. Precisely so, and therefore can we move forwards,
 14 please, to {DC7478/5}. I wonder whether that could be
 15 enlarged, please. This is a note made by DCI Chambers
 16 in the course of the first JOT, and you can see the date
 17 at the top, 28 [April] 2018. Sorry, November 2018,
 18 thank you very much, Mr Hough.
 19 Can you see "Recent prison intel", about eight lines
 20 in?
 21 A. Yes.
 22 Q. And then it says:
 23 "Intending to return to old ways and will conduct
 24 attack on release. Low credibility."
 25 By this time, by the first JOT, does that suggest

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1 that the mistake within MI5 had been realised and
 2 corrected, and that both pieces of intelligence were
 3 being assessed in the same way as uncorroborated?
 4 A. Just for clarification, it wasn't a mistake, it was
 5 actually a piece of work to examine whether or not they
 6 were two pieces of separate intelligence. We have to do
 7 that work to be absolutely sure that we haven't got two
 8 pieces corroborating each other; they did not. This
 9 line indicates that both pieces, to my knowledge, at
 10 that time were being regarded as of unknown validity.
 11 Q. Yes, thank you very much. You're right to pull me up on
 12 the word "mistake", Witness A. Further assessment had
 13 been done and the accurate position had been revealed?
 14 A. Correct.
 15 Q. Thank you. So, in summary, although it was clear that
 16 initially as reported, only one of the two strands was
 17 uncorroborated, as correctly recorded by Mr Chambers in
 18 his witness statement, by the time of the JOT, the
 19 correct position had been reached --
 20 A. Yes.
 21 Q. -- and accurately communicated to police officers?
 22 A. Yes.
 23 Q. Would you agree that what's more important here at this
 24 stage --
 25 A. Oh, I'm sorry, may I just add a clarification to that?

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1 Q. Yes.
 2 A. Because I believe that actually the duplication wasn't
 3 known until after the JOT, because I believe the JOT
 4 minutes still recorded the "old ways" intelligence as
 5 being corroborated, so it was actually just slightly
 6 after that, but it was prior to release. Sorry for the
 7 clarification.
 8 Q. I understand. The next question arising from that is,
 9 is what's more important here not whether the
 10 intelligence was -- we can use a number of words --
 11 plausible, implausible, credible, incredible, you should
 12 distrust it, whether there was reason to trust it or not
 13 trust it, rather, what is more important is what MI5 did
 14 as a result of it?
 15 A. That's correct.
 16 Q. Lastly, can I turn to the relationship between MI5 and
 17 counter-terrorism policing on the one hand and the
 18 Prevent and probation teams on the other. In some cases
 19 there may be sensitive intelligence which needs to be
 20 disseminated to the probation and Prevent teams or
 21 perhaps to MAPPA more generally; would you agree?
 22 A. I would agree.
 23 Q. If that's the case, is it right that the intelligence
 24 may need to be sanitised before it's disclosed and so
 25 a form of words is drawn up?

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1 A. It may need to be carefully looked at to see whether
 2 it's possible to release it, or whether it needs to be
 3 slightly adjusted, not losing the meaning of it, but
 4 slightly adjusted in order to share it with potentially
 5 uncleared partners.
 6 Q. And so that's, amongst other things, so that the source
 7 of the intelligence isn't compromised?
 8 A. That's correct.
 9 Q. And so that, more importantly still, if it was revealed
 10 to the subject of interest by some means or other, it
 11 would not reveal things to them that they should not
 12 know?
 13 A. That's correct.
 14 Q. And so that kind of disclosure, if it was ever to occur,
 15 would be the subject of much discussion and thought?
 16 A. Usually, yes.
 17 Q. And any such disclosure is written carefully, so that
 18 the things that we have just mentioned are not included
 19 within it?
 20 A. Yes.
 21 Q. But still the essence of the message is conveyed?
 22 A. Correct.
 23 Q. And in that way, is the sterile corridor that I've
 24 previously spoken about, and I think, as you've said,
 25 you called it a firewall, is broken, but it's broken in

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1 a measured and controlled way?
 2 A. It certainly would be a factor in the thinking. It's
 3 not a -- it's not an impermeable barrier, as it were.
 4 Q. No. And so that would be a case where MI5 would be
 5 seeking to influence a MAPPA decision or that of the
 6 Probation Service by making such a disclosure through
 7 the police service?
 8 A. That is our route for disclosing any information. It
 9 would be through the police service.
 10 Q. In this case there was no form of words to be written,
 11 there was no disclosure to make, there was nothing to
 12 write. Is that the essence of your evidence?
 13 A. That's correct.
 14 Q. It's been suggested that even though there was no
 15 disclosure to make, even though there was no form of
 16 words to be written, your colleagues in MI5 ought to
 17 have ensured that their healthy scepticism about Khan
 18 over, for example, whether he had reformed or been
 19 rehabilitated, should have been communicated to the
 20 Prevent and probation teams, the so-called collective
 21 wisdom of your colleagues; do you understand?
 22 A. That's what's been put to me today.
 23 Q. Yes. Is the normal operating mode of those within MI5
 24 dealing with convicted terrorists to have a healthy
 25 scepticism of them generally?

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1 A. Absolutely.
 2 Q. Would that ever be made up into a form of words, ie:
 3 We've got nothing specific to say to you, we've got
 4 specific intelligence to disclose, we've got no specific
 5 intelligence to support our scepticism or our collective
 6 wisdom, but we are sceptical people, you should be
 7 careful?
 8 A. I'm not aware that that particular assessment has been
 9 made in the format that you describe.
 10 MR BEER: Yes, thank you very much indeed.
 11 JUDGE LUCRAFT: Mr Baumber.
 12 Questions by MR BAUMBER
 13 MR BAUMBER: Good afternoon, Kevin Baumber, counsel for
 14 Staffs Prevent officers.
 15 A. Good afternoon.
 16 Q. As the overt police contact for Khan, the Prevent Team
 17 would have no direct role in the priority operation,
 18 would they?
 19 A. No, that's right.
 20 Q. And as to the limits of the information or the
 21 intelligence that they receive, is that essentially
 22 a decision for the counter-terror police officers who
 23 receive that from you?
 24 A. Yes, that's correct.
 25 Q. Can I ask you about the scepticism of Khan's compliance

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1 with those rules as monitored by probation and Prevent.
 2 The suspicion, effectively, is that he is compliance or
 3 well behaved, you had said, to reduce scrutiny. I would
 4 just like to ask what is that reduced scrutiny and why
 5 did he want it, according to the suspicion?
 6 A. So we didn't -- we had no intelligence to suggest that
 7 he was deliberately trying to avoid scrutiny. It was
 8 an internal judgment of MI5 that we thought it was
 9 possible that he might be seeking to avoid scrutiny.
 10 It's part of a healthy scepticism which we take into
 11 an investigation when we look at whether somebody
 12 is likely to try and re-engage or engage in
 13 terrorist-related activities.
 14 Q. In terms of what it is, what is the reduced scrutiny,
 15 might that be, for example, achieving a reduction in his
 16 licence conditions?
 17 A. I guess it could manifest itself in that way.
 18 Q. Or reducing the frequency of the visits from the Prevent
 19 Team under part 4?
 20 A. I think it could take a variety of different forms. It
 21 would depend on each individual case and the
 22 circumstances of that case.
 23 Q. According to the suspicion, why is it that he wants it
 24 according to the suspicion. For example, it might be
 25 in order to be able to plan and commit a terrorist

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1 attack, it might be just to enjoy some more privacy and
 2 freedoms. Under the suspicion, why was it thought he
 3 wanted less scrutiny?
 4 A. I think the scepticism is around whether or not he is
 5 seeking to hide any activities of national security
 6 concern, and having less scrutiny would enable him to
 7 potentially achieve that.
 8 Q. So for the priority operation, does the longevity of the
 9 weight that you might attach to intelligence like
 10 returning to old ways, attack aspiration, is that
 11 longevity increased by this suspicion, in other words,
 12 you don't take long-term good behaviour as negating the
 13 intelligence because you suspect it might be an act?
 14 A. It never negates the intelligence. The intelligence
 15 remains there to be corroborated or otherwise, but
 16 obviously as an investigation rolls on, month after
 17 month after month, and we are employing -- deploying, if
 18 you like, a range of monitoring options and capabilities
 19 to understand him, and we see no activities of national
 20 security concern, that has to be taken into the overall
 21 assessment of where we're at with an investigation.
 22 Q. Did it follow from that suspicion that Prevent officers
 23 might be likely to experience Khan at his best
 24 behaviour, as it were?
 25 A. I think -- I don't think that's necessarily for us to

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1 judge. I think we just remain sceptical.
 2 Q. Can you say whether the weight that you would attach to
 3 the good behaviour reports relayed by Prevent officers
 4 would be reduced by reason of this suspicion?
 5 A. I think we looked at it all in the round. The reports
 6 that we received from Prevent officers were helpful, as
 7 one part of an intelligence — one part of
 8 an investigative jigsaw, if you like. They were one
 9 aspect of it.
 10 Q. Turning to the Fishmongers' event and the
 11 decision-making. Whilst it had been mentioned earlier,
 12 you've told us that that was raised at the JOT on
 13 18 November, that a meeting that Prevent were not
 14 present at; is that right?
 15 A. That's right.
 16 Q. And that's because the CTU officers didn't want them
 17 there, but for legitimate sterile corridor reasons?
 18 A. I'm not sure sort of who made the decision that they
 19 weren't to be there. I think there was a bit of crossed
 20 wires as to whether they were going to be there or not
 21 going to be there, but when I spoke to the investigative
 22 team about it, they were clear that they should not be
 23 there.
 24 Q. When, not long after that meeting, the detailed travel
 25 arrangements were conveyed, there was no tasking or

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1 action cascaded down to any frontline team of officers
 2 to accompany him or take other measures, were there?
 3 A. Not in respect of that visit, no.
 4 Q. If there were, if there had been a determination that
 5 some measures needed to be achieved, it seems clear that
 6 MAPPAs can be reached as a means to take steps in respect
 7 of an event like Fishmongers' if controls or
 8 intervention or even a prohibition is identified as
 9 a need, via the bridge of counter-terror officers?
 10 A. Correct.
 11 Q. The information that those officers shared you said had
 12 little restraint placed upon it, and that included, of
 13 course, the two strands, "old ways" and attack
 14 aspiration?
 15 A. Yes.
 16 Q. And are the counter-terror officers permitted to bring
 17 that knowledge to give input and assistance to MAPPAs
 18 when it is told Khan is to attend Fishmongers' alone?
 19 A. Sorry, may I make sure that I've understood your
 20 question correctly?
 21 Q. Yes. I'm asking whether the counter-terror officers are
 22 permitted to bring the knowledge of those strands of
 23 intelligence to give input and assistance to MAPPAs when
 24 it is told that Khan is attending Fishmongers' and doing
 25 so alone?

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1 A. Yes, they would consider whether it was appropriate to
 2 share that information.
 3 Q. Of the two strands, attack aspiration, would you agree,
 4 is a more relevant strand to a decision on Fishmongers'
 5 than "old ways", because "old ways" might mean foreign
 6 arrangements, whereas attack aspiration is on point for
 7 an event in an iconic building on London Bridge?
 8 A. With hindsight it looks that way.
 9 Q. Mr Hough showed you the document where attack aspiration
 10 was a strand not included, where "old ways" was, albeit
 11 under that different description of low grade. You said
 12 at one point, it was on a slightly different topic, but
 13 you said at one point that you were absolutely sure that
 14 counter-terror officers would share relevant intel, ie
 15 take it down to MAPPAs and beyond. Would you agree that
 16 attack aspiration is a strand relevant to attendance at
 17 the Fishmongers' event?
 18 A. Well, I can't comment on what information — what was
 19 discussed and the nature of the conversations at the
 20 MAPPAs meeting. I am afraid I can't comment on those.
 21 Q. You have commented you would be absolutely sure that
 22 counter-terror officers would share relevant intel.
 23 I'm just asking whether relevant intel would include the
 24 attack aspiration strand when it comes to attending
 25 Fishmongers'?

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1 A. So they were certainly at liberty to share the relevant
 2 intelligence that they saw fit to do so. Absolutely.
 3 Q. When you say that, from the M15 point of view on
 4 Fishmongers' there was nothing to feed in, is that on
 5 the assumption that the attack aspiration strand had
 6 already been fed in much earlier by the counter-terror
 7 officers?
 8 A. So there was nothing new to feed in. The investigation
 9 had continued, as you know, for some 11 months or so,
 10 and there was no intelligence over the course of that
 11 period to validate or corroborate that original
 12 intelligence from November 2018.
 13 Q. I understand that, that's an answer you have repeated
 14 many times because it is your answer to this topic.
 15 What I'm asking is, is that answer given on the
 16 assumption that the attack aspiration intel had already
 17 been fed in much earlier?
 18 A. I think that would be for our police colleagues to
 19 answer.
 20 MR BAUMBER: I have no further questions.
 21 JUDGE LUCRAFT: Thank you.
 22 Questions by MR SHELDON QC
 23 JUDGE LUCRAFT: Mr Sheldon, again, you've been in the hall
 24 at various times, but the jury may just benefit from
 25 seeing you, if you just want to turn to them just so you

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1 can introduce yourself. I know the witness knows you
 2 very well, but I'm just conscious that most of the other
 3 advocates who have spoken this afternoon are people the
 4 jury have seen quite a bit of at various times.
 5 MR SHELDON: Certainly, sir.
 6 Good afternoon, members of the jury.
 7 Witness A, good afternoon.
 8 A. Good afternoon.
 9 Q. As you know, my name is Neil Sheldon and I act for the
 10 Secretaries of State for Justice and the Home
 11 Department. It's been a long day of evidence and
 12 I apologise for prolonging it, but I will only detain
 13 you and everybody else for a few minutes.
 14 I appreciate that you cannot go into specifics, but
 15 can you please confirm that Khan had been under
 16 continuous and active investigation by MI5 for the
 17 entirety of the period between his release in late 2018
 18 and the attack 11 months later?
 19 A. That's correct.
 20 Q. He was, to use what I hope is the correct terminology,
 21 an active subject of interest to MI5 throughout that
 22 period; is that correct?
 23 A. He was, yes.
 24 Q. One of 3,000 such active SOIs at the time with which
 25 we're concerned?

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1 A. That's correct.
 2 Q. Now, as to the nature of the investigation that MI5 was
 3 running into Khan during that period, can we please have
 4 paragraph 32 of your witness statement back? It's
 5 {WS5052/9}. You were shown this by Mr Hough and you
 6 explained to him that throughout the period of active
 7 investigation post-release, Khan was being investigated,
 8 subject to a P3 investigation; is that right?
 9 A. That's correct.
 10 Q. He was --
 11 A. Other than just the period when he was still in prison.
 12 Q. Certainly. He was upgraded to a P3 from a P4 following
 13 receipt of the intelligence in late 2018 about returning
 14 to his old ways and attack aspirations.
 15 A. That's correct.
 16 Q. What is the essential purpose of an MI5 P3
 17 investigation?
 18 A. It is to determine whether or not they pose a threat.
 19 Q. Thank you. We can take that down.
 20 I wonder, Witness A, in simple terms, whether that's
 21 a fair summary of MI5's essential task in respect of all
 22 3,000 SOIs it's investigating at any one time?
 23 A. Yes, I would say that is the case.
 24 Q. Attempting to identify what they're planning to do next,
 25 in essence?

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1 A. Yes.
 2 Q. Often on very limited intelligence?
 3 A. Yes, that's correct.
 4 Q. Because, as I think Mr Hough explored with you, some
 5 leave clues and some don't?
 6 A. That's correct.
 7 Q. And is it fair to say that the essential tool you use
 8 for those purposes is the intelligence that you collect
 9 using the methods that you have described in general
 10 terms?
 11 A. Yes, that's correct.
 12 Q. Now, Khan fell into a particular category of subject of
 13 interest because he had been openly revealed to be
 14 a terrorist by virtue of his prosecution and conviction
 15 for terrorist offences; is that right?
 16 A. Yes.
 17 Q. And as a terrorist offender serving his sentence in the
 18 community, Khan was subject to a framework of
 19 management, involving a number of different agencies,
 20 and we've heard all about that. But can I ask you
 21 briefly about MAPPAs. The jury have heard a lot about
 22 MAPPAs, but can I just confirm this: is MI5 a responsible
 23 authority for the purposes of MAPPAs?
 24 A. No, we're not.
 25 Q. Does it have any statutory responsibilities in relation

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1 to MAPPAs?
 2 A. Not in relation to MAPPAs.
 3 Q. The bridge into MAPPAs, to which you've referred on
 4 a number of occasions, is formed by CT police. Was that
 5 bridge open throughout the period with which we are
 6 concerned?
 7 A. Yes, it was.
 8 Q. Now, you were asked by Mr Armstrong to leave formality
 9 to one side for a moment and contemplate a direct
 10 communication of intelligence by MI5 into MAPPAs. Why is
 11 it important not to leave formality aside and not to
 12 communicate directly in that way?
 13 A. Because not all members of MAPPAs would have had the
 14 appropriate level of security clearance to be able to
 15 protect the information that potentially we might share
 16 into that meeting.
 17 Q. The November 2018 intelligence, please, old ways and
 18 attack aspiration. Were CT police made aware of both of
 19 those strands of intelligence?
 20 A. Yes, they were.
 21 Q. Is it MI5's job to second-guess or quality-assure the
 22 way in which that information is then passed on by the
 23 police into MAPPAs?
 24 A. No, it's not.
 25 Q. Now, as Mr Beer just said to you, a lot of time has been

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1 spent analysing the language in which this intelligence
 2 was characterised, and I'm not going to go back over all
 3 that. I would like to just briefly approach things from
 4 a pragmatic perspective, please, and look at what MI5
 5 did in response to it. First of all, did MI5 take it
 6 seriously?
 7 A. We absolutely took it seriously.
 8 Q. And in summary terms, Witness A, what did you do in
 9 response to it?
 10 A. So we shared the intelligence with our police
 11 colleagues. We upgraded the priority of the
 12 investigation from a P4 to a P3. We set
 13 an investigative strategy and we put in place the
 14 appropriate coverage to complement the strict licence
 15 conditions that were being put in place.
 16 Q. Thank you. You also, I think, sought, to the extent
 17 that you were able to do so, to validate or corroborate
 18 it; is that right?
 19 A. That's correct.
 20 Q. Post-release now, please. In the course of the active
 21 11-month investigation which we've been discussing
 22 post-release, what, if any, intelligence did MI5 obtain
 23 to the effect that Khan was or might be planning
 24 an attack?
 25 A. We received no intelligence to that effect.

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1 Q. Now, just to be clear, I'm not sure you have had
 2 an opportunity to make this clear so far, if MI5 had
 3 received intelligence at any stage that Khan was or
 4 might be planning an attack, what would you have done?
 5 A. We would have immediately shared it with our police
 6 colleagues and together we would have absolutely taken
 7 steps to ensure that that was prevented.
 8 Q. Executive action, is I think the way it's been described
 9 previously; is that right?
 10 A. That's correct, an arrest.
 11 Q. Now, of course there may be intelligence which doesn't
 12 go as far as indicating an attack, but is concerning
 13 because it suggests that an individual might be heading
 14 in that direction, accessing extremist information on
 15 the internet or associating with individuals of concern,
 16 changing behaviour, perhaps, in concerning ways. What,
 17 if any, intelligence of that nature did MI5 obtain
 18 during its post-release investigation?
 19 A. We saw no intelligence to suggest that he was engaging
 20 in the type of behaviour that we might see subjects of
 21 interest looking to do. For example, he wasn't
 22 re-engaging with old associates, he wasn't looking up
 23 extremist material on the internet. We saw nothing to
 24 that effect.
 25 Q. And then finally for these purposes, what if any

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1 intelligence did MI5 obtain as to Khan's motivation for
 2 attending the Learning Together event in November 2019?
 3 A. We had no intelligence as to his motivations for
 4 attending the event.
 5 Q. Now, it was put to you by Mr Hough that your overt
 6 colleagues, including the offender manager, didn't have
 7 anything like the same intelligence picture that you
 8 had. I'm not going to spend time now unpicking that,
 9 but can I just invite you to consider these two
 10 questions arising from it. Did MI5 at any stage hold
 11 any intelligence back that it had collected relating to
 12 Khan?
 13 A. No, we did not.
 14 Q. Were there any occasions upon which MI5 felt obliged not
 15 to share intelligence for any reason, including
 16 protection of sources?
 17 A. No. No occasion at all.
 18 Q. Although you didn't have any intelligence, you did have,
 19 as you've repeatedly confirmed, a healthy level of
 20 scepticism, and you describe MI5's job in these
 21 circumstances to be inherently sceptical. And you've
 22 referred on a number of occasions to the MAPPA minutes
 23 for July 2019, which I think I should probably show you
 24 briefly. Could we have {DC6414/7}, please, and could we
 25 scroll down to the bottom of the page, section 13. Now,

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1 Witness A, perhaps in the interests of efficiency you'll
 2 take it from me that this is the July 2019 MAPPA
 3 minutes, and there's a section entitled "Risk assessment
 4 summary". Do you see that?
 5 A. Yes.
 6 Q. "Who is at risk?", "what is the nature of the risk?"
 7 Could we go over to the top of the next page, please
 8 {DC6414/8}. At the top of the page do we see these
 9 words, one of the risks identified is expressed as:
 10 "Manipulation and gaining of personal information,
 11 possible violence as per the [different] comment..."
 12 And then:
 13 "When is the risk likely to be greatest?
 14 "When staff drop their guard, or possibly become
 15 involved with Mr Khan."
 16 Was that what you were referring to, Witness A, when
 17 you were citing the July 2019 MAPPA minutes?
 18 A. Yes, that's correct.
 19 Q. And that risk of manipulation and the need for staff to
 20 ensure that they did not drop their guard, what do you
 21 understand that to convey?
 22 A. I mean, it's difficult for me to comment on, on
 23 a conclusion by MAPPA, but it would look like they were
 24 aware that potentially there was a risk that individuals
 25 engaging with Khan could be manipulated by him.

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1 Q. And to what extent would your institutional scepticism
 2 have been able to add much, if anything, to that?
 3 A. Not much.
 4 Q. You were asked about whether certain types of location
 5 hold a particular appeal to terrorists , and it was put
 6 to you that a layman might think that city centres and
 7 iconic buildings or landmarks might fall into that
 8 category; do you remember those questions?
 9 A. I remember them.
 10 Q. I won't rehearse your answers, but the essential effect
 11 of them, I think, was that in MI5's experience it's
 12 a little more complicated than that and there are often
 13 a range of reasons why an individual will target
 14 a particular location or event; is that right?
 15 A. That's entirely right.
 16 Q. Now, I just want to identify the basis upon which that
 17 answer was given, please. Could we have your witness
 18 statement {WVS5052/3}, paragraph 11.
 19 Now, in this paragraph, Witness A, you deal not just
 20 with the attacks that everybody knows about, the attacks
 21 that succeed, but also the plots that MI5 is successful
 22 in preventing or disrupting, and you refer in particular
 23 to the 27 major terrorist plots that have been disrupted
 24 since 2017; do you see where I am?
 25 A. Yes.

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1 Q. When you were answering Mr Hough about the patterns or
 2 lack of it, or lack of them in relation to targeting
 3 particular sites or events, were you basing your answer
 4 on the totality of the picture as MI5 sees it, rather
 5 than just the visible bit?
 6 A. Yes, that's correct.
 7 Q. Thank you. One final point, if I may.
 8 The question may arise, of course, of whether, if
 9 you had investigated Khan more intensively and with
 10 a greater level of coverage, you would have got
 11 intelligence to pass on of the type we've been
 12 discussing. So can we address that very briefly,
 13 please?
 14 The post-attack review that MI5 undertook, how
 15 thorough would you say that it was?
 16 A. I would say it was very thorough.
 17 Q. It included, I think, your MI6 and GCHQ colleagues, is
 18 that correct?
 19 A. They were involved insofar as they reviewed their
 20 holdings.
 21 Q. Yes, to see whether they held any potentially relevant
 22 intelligence in addition to you?
 23 A. That's correct.
 24 Q. And what did that whole process reveal on the question
 25 of whether Khan involved anybody else in his

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1 attack-planning?
 2 A. We saw no intelligence to suggest that anybody else was
 3 involved in his attack-planning.
 4 Q. What did it reveal about Khan's behaviour or pattern of
 5 movements in the run-up to the attack?
 6 A. That there was nothing beyond which we could expect to
 7 see in other TACT offenders in the run-up to the
 8 Fishmongers' event.
 9 Q. What did it reveal about his internet usage or access to
 10 extremist material?
 11 A. Nothing.
 12 Q. As far as MI5 is aware, other than purchasing the items
 13 he used on the day, what planning and preparation did
 14 Khan undertake in advance of the attack?
 15 A. We didn't see anything.
 16 Q. Now, I appreciate you cannot go into details, but in
 17 general terms, what level of coverage would you have had
 18 to have had in order to detect the planning and
 19 preparation of this attack?
 20 A. You would have had to have had an extremely high level
 21 of coverage, some 24/7 coverage.
 22 Q. How do you decide how intensely and intrusively to
 23 investigate subjects of interest?
 24 A. So it depends on the intelligence that you have in front
 25 of you, and if you are investigating a live threat, then

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1 clearly you would deploy a greater level of resources
 2 against that threat.
 3 Q. Having reviewed the totality of the material, would the
 4 level of investigation necessary to detect the planning
 5 and preparation of this attack have been justified on
 6 the intelligence picture as it stood in November 2019?
 7 A. Sorry, could you repeat the question, please?
 8 Q. Certainly. Having reviewed the totality of the
 9 material, including all the underlying intelligence,
 10 would the level of investigation necessary to detect the
 11 planning and preparation of this attack have been
 12 justified in November 2019?
 13 A. Not on the basis of the intelligence that we had in
 14 front of us at the time.
 15 MR SHELDON: Thank you very much, Witness A, those are all
 16 my questions.
 17 Thank you, sir.
 18 JUDGE LUCRAFT: Thank you very much, Mr Sheldon.
 19 Further questions by MR HOUGH QC
 20 MR HOUGH: Witness A, just finally a question from me in
 21 relation to the questions you were just asked by
 22 Mr Sheldon. You said that it would have required
 23 practically 24/7 coverage of Khan to detect anything
 24 about attack-planning. You said in answers to questions
 25 that I asked earlier in the day that if MI5 had received

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1 intelligence of the purchases, including the knife
 2 purchases, that would have triggered concern and action?
 3 A. That's correct.
 4 Q. I don't want to go into the specifics of different forms
 5 of monitoring, but it's right, isn't it, that the
 6 monitoring you engaged in early in 2019 revealed certain
 7 purchases, including the purchase of the Xbox?
 8 A. That's correct.
 9 Q. With that in mind, would it necessarily have required
 10 24/7 monitoring to identify the purchase of items in
 11 Stafford, including potentially the knives?
 12 A. I am afraid I can't get into the detail of how we deploy
 13 our resources and how frequently or otherwise we might
 14 seek to deploy them, I am afraid.
 15 Q. I appreciate that, but Mr Sheldon asked you specifically
 16 whether it would have required 24/7 coverage to identify
 17 matters of sufficient concern to result in action?
 18 A. I think it would have required an extremely high level
 19 of coverage in order to spot the purchases and the
 20 creation of the hoax IED. That would have been
 21 disproportionate to the intelligence that we had at the
 22 time. Disproportionate, likely unjustified, and
 23 probably unlawful.
 24 Q. But 24/7?
 25 A. I think you potentially would have needed 24/7 coverage

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1 to spot all of that.
 2 MR HOUGH: Thank you very much. Those are all my questions,
 3 and those are all the questions we have for you. Thank
 4 you for giving evidence.
 5 A. Thank you for the opportunity.
 6 JUDGE LUCRAFT: Witness A, thank you very much indeed for
 7 coming and for also putting up with being confined in
 8 a box for quite a long period of time.
 9 Mr Hough, the good news is that, without imposing
 10 undue time pressures on people, we have managed to
 11 conclude Witness A in a day.
 12 Thank you, members of the jury, for coming in
 13 a little bit early and for foregoing part of the lunch
 14 break. As a reward we will start at 10 o'clock tomorrow
 15 rather than any earlier. I know it's not much of
 16 a reward, but at least tomorrow is Friday, so I'll look
 17 forward to seeing you all at 10 o'clock in the morning.
 18 (In the absence of the jury)
 19 I'll rise.
 20 (4.36 pm)
 21 (The court adjourned until 10.00 am on
 22 Friday, 14 May 2021)
 23
 24
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