

OPUS 2

INTERNATIONAL

Manchester Arena Inquiry PIR 4

Day 1

November 22, 2019

Opus 2 International - Official Court Reporters

Phone: 020 3008 5900

Email: transcripts@opus2.com

Website: <https://www.opus2.com>

1 Friday, 22 November 2019
 2 (10.00 am)
 3 (Proceedings delayed)
 4 (10.24 am)
 5 Pre-inquiry review
 6 SIR JOHN SAUNDERS: Mr Greaney.
 7 MR GREANEY: Sir, good morning. This is the first hearing
 8 in the Manchester Arena Inquiry, although it follows and
 9 will build upon a series of hearings that took place
 10 in the Manchester Arena Inquest.
 11 In a few moments I'll deal with the representation
 12 of the core participants, as they now are, but before
 13 that I'll deal with the issue of reporting to which
 14 there are a number of aspects that we invite people to
 15 bear in mind.
 16 First of all, the trial of Hashem Abedi, the brother
 17 of Salman Abedi, the bomber, is due to start now on
 18 13 January of next year. It follows that not only are
 19 the proceedings against Hashem Abedi live within the
 20 meaning of the Contempt of Court Act, but also the trial
 21 is imminent.
 22 Four connected matters flow from this. First, the
 23 press and others with an interest in this case will be
 24 aware of the critical importance of not reporting
 25 anything that may create a substantial risk that the

1

1 course of justice in the proceedings against
 2 Hashem Abedi will be seriously impeded or prejudiced
 3 and, indeed, to do so would be a contempt of court.
 4 Sir, we are certain that all in this room will share
 5 your wish that nothing that occurs in the inquiry, or
 6 in the preparation for it, should jeopardise the
 7 fairness of that trial.
 8 Secondly, in the criminal proceedings an order has
 9 been made under section 4.2 of the Contempt of Court
 10 Act, that order postpones reporting of any aspect of the
 11 proceedings against Hashem Abedi, save for certain
 12 identified matters. The identified matters are as
 13 follows.
 14 First, the identity of the court and the name of the
 15 judge.
 16 Second, the name, age, home address and occupation
 17 of the accused.
 18 Third, the offence or offences, or a summary
 19 of them, with which the accused is charged.
 20 Fourth, the names of counsel and solicitors engaged
 21 in those proceedings.
 22 Fifth, where the proceedings are adjourned, the date
 23 and place to which they are adjourned.
 24 Sixth, the fact that Hashem Abedi has been remanded
 25 into custody.

2

1 Seventh, the representation provided to the accused
 2 was provided under the applicable legislation.
 3 Eighth, the fact that an application has been made
 4 by the Crown for Hashem Abedi to be interviewed but not
 5 the details of the application itself or the outcome of
 6 it.
 7 Anyone considering reporting anything about this
 8 case or expressing a view on social media must, we
 9 suggest, refer to the order and ensure that they comply
 10 with it.
 11 The position of CTI, your counsel, sir, is that the
 12 order applies to anything said during the course of any
 13 hearing in this inquiry, including the hearing today.
 14 So that is to say if anything is said today about the
 15 proceedings against Hashem Abedi beyond the matters
 16 we have just identified, and we anticipate that they
 17 will, the order in the criminal proceedings will bite
 18 upon those matters.
 19 Thirdly, at the fourth pre-inquest review hearing,
 20 sir, you made a section 4.2 order postponing any
 21 reporting of the fact that within the scope of the
 22 inquests was the issue of whether there should have been
 23 Prevent referrals in respect of Salman Abedi's family.
 24 That was the order that was made on 29 July.
 25 That issue, the Prevent referral issue, also forms

3

1 part of the terms of reference for your inquiry. The
 2 reasons which made the order appropriate in the inquests
 3 apply equally in the inquiry. So, sir, we submit that
 4 you should make an order postponing any reporting of the
 5 fact that this issue forms part of the terms of
 6 reference in these proceedings as well and we'll invite
 7 you to make that order in a short time once you've heard
 8 representations from others.
 9 Fourthly, it seems to us that some limited steps do
 10 need to be taken now to ensure that no reporting of the
 11 hearing today creates any risk of prejudice to the
 12 proceedings against Hashem Abedi. Accordingly, we
 13 suggest, as indeed we've suggested without objection at
 14 a number of earlier hearings, that there must be no live
 15 reporting, whether by Twitter or social media or
 16 otherwise during the course of this hearing until
 17 otherwise indicated.
 18 What we intend, so that all know, is that at the
 19 conclusion of the oral submissions today, which ought,
 20 we consider, having consulted others, to conclude well
 21 before lunch, there should be a short break during which
 22 we can give consideration, in consultation with counsel
 23 to the CPS and GMP and others, if necessary, to whether
 24 anything has been said that may create a risk of
 25 substantial prejudice to the administration of justice

4

1 in the proceedings against Hashem Abedi.
 2 If it has, in our judgement, then the issue can be
 3 raised and formally ruled upon by reference to the test
 4 in section 4.2. If it has not the proceedings can be
 5 reported without any substantial delay having occurred
 6 and without any material incursion into the important
 7 public interest in open justice.

8 Sir, for the avoidance of doubt, your power to delay
 9 reporting, for what will be no more than 3 hours, we
 10 anticipate, exists under section 4.2 and if there is any
 11 challenge to that highly time-limited order, we'll
 12 address you further in detail at that stage.

13 We hope that all of that will make sense and that
 14 everyone will understand why it has been necessary to
 15 express it in strong terms.

16 Sir, having made our submissions, we will invite you
 17 to hear submissions on this topic only if there are any,
 18 first of all, from Mr Penny Queen's Counsel, on behalf
 19 of the Crown Prosecution Service; second from Ms Barton
 20 Queen's Counsel on behalf of Greater Manchester Police;
 21 third from the representatives of the bereaved families,
 22 and Mr Weatherby Queen's Counsel will address you first
 23 today on behalf of all of the family teams; fourth from
 24 any other interested persons who wish to make
 25 submissions; and fifth and finally, of course from any

1 member of the press who wishes to make submissions to
 2 you.

3 That concludes our observations about reporting.

4 SIR JOHN SAUNDERS: Mr Penny?

5 MR PENNY: I have nothing to add at this stage, subject to
 6 the matter arising, of course.

7 SIR JOHN SAUNDERS: Thank you.

8 MS BARTON: I have nothing to add, thank you, sir.

9 SIR JOHN SAUNDERS: Does any counsel or legal representative
 10 have anything to say?

11 Members of the press, I hope you all heard that and
 12 understood what it was. Have any of you any problem
 13 with delaying any reporting until we've finished these
 14 proceedings? We can have a short break and then, if
 15 there needs to be any ruling on anything not being
 16 reportable, I can make it then. It's all to avoid any
 17 prejudice to the trial which is to take place.
 18 Of course, if there are things which I say shouldn't be
 19 reported, I'd allow you to make submissions to me at
 20 that stage as well. Does anyone want to say anything at
 21 the moment?

22 Okay. Thank you. No tweeting, thank you very much.

23 MR GREANEY: Thank you very much, sir.

24 We'll turn next then to the issues on the agenda for
 25 this hearing.

1 The purpose of this hearing is to enable your legal
 2 team to update you, the core participants and the wider
 3 public about progress to date and, in particular,
 4 progress since the last hearing about the challenges
 5 that we face and to allow you, sir, to give further
 6 directions and to make rulings if indeed rulings are
 7 necessary today.

8 First of all, we'll deal with representation,
 9 followed by a brief summary of developments in recent
 10 months and then we'll deal with the agenda items in the
 11 following order.

12 First of all, we'll deal with the establishment of
 13 the inquiry, which will involve considering the terms of
 14 reference for the inquiry, the designation of core
 15 participants, and the live streaming of the hearings
 16 before, finally under this heading, dealing with an
 17 update as to you venue for the oral evidence hearings.

18 The second broad topic that we'll deal with under
 19 the agenda is the suspension of the inquests, albeit
 20 that topic will not take long.

21 Thirdly and finally, but importantly, there will be
 22 an update on the investigation, disclosure, and experts.
 23 Which will involve consideration of a general update,
 24 the trial of Hashem Abedi and the disclosure of
 25 prosecution materials -- two particular concerns, sir,

1 that we have that are capable of having an impact upon
 2 the start date that we must raise -- and then, finally,
 3 the topic of position statements that, most helpfully,
 4 Mr Weatherby has raised in writing ahead of this
 5 hearing.

6 Then we'll deal with any other business before
 7 taking that short break to consider whether any further
 8 reporting restrictions ought to be imposed.

9 As we've done previously, what we intend is that
 10 submissions should be made on these topics, one at
 11 a time, pausing between each topic to invite submissions
 12 from the core participants once they've heard from CTI
 13 in the order that seems most appropriate to the topic
 14 under consideration and we hope that that seems, as it
 15 has done on previous occasions, to be a sensible
 16 approach to the hearing.

17 Representation, first of all. As everyone will now,
 18 we are certain, know, I am counsel to the inquiry
 19 together with Sophie Cartwright, Nicholas de la Poer,
 20 Jesse Nicholls and Alasdair Henderson. We are supported
 21 by the solicitor to the inquiry, Tim Suter and his team
 22 at Field Fisher.

23 So far as core participants are concerned, we'll
 24 deal with representation in the order in which it
 25 appears in the list that has been circulated.

1 First, the family members of John Atkinson,
 2 Kelly Brewster, Wendy Fawell, Megan Hurley, Mary Nell
 3 Jones, Angelika Klis, Martin Klis, Eilidh MacLeod,
 4 Martyn Hett, Elaine McIver, Lisa Lees, that is to say
 5 her husband, and Georgina Callander, her mother, sir,
 6 all of those bereaved families are represented by
 7 Alex Jamieson and Alex de Francesco, instructed by
 8 Slater & Gordon Solicitors.

9 The family members of Saffie Rose Roussos,
 10 Alison Howe, Lisa Lees, her mother and brother,
 11 Georgina Callander, her father, Olivia Paige Campbell
 12 Hardy, Sorrell Leczkowski and Philip Tron are
 13 represented by my learned friend Mr Pete Weatherby
 14 Queen's Counsel and his team, and they are instructed by
 15 Broudie Canter Jackson and Hudgell solicitors.

16 The father of Courtney Boyle, the father of
 17 Martyn Hett and the partner of Elaine McIver are
 18 represented by Austin Welch, instructed by
 19 Addleshaw Goddard.

20 The families of Michelle Kiss, Jane Carolyn Tweddle,
 21 Liam Curry, Chloe Rutherford, the father of Olivia Paige
 22 Campbell Hardy, and the mother of Courtney Boyle are
 23 represented by Adam Payter. He is instructed by
 24 Hogan Lovells.

25 British Transport Police is represented by Patrick

1 Gibbs Queen's Counsel, instructed by Mariel Irvine.
 2 The Greater Manchester Combined Authority is
 3 represented by Andrew Warnock Queen's Counsel,
 4 instructed by BLM.

5 Greater Manchester Police, which we'll refer to as
 6 GMP, is represented by Fiona Barton Queen's Counsel, as
 7 I have indicated, together with Kate Cornell, instructed
 8 by the solicitor to GMP.

9 The North-West Ambulance Service is represented by
 10 Adam Fullwood, instructed by Weightmans.

11 The Secretary of State for the Home Department,
 12 which we'll refer to as HMG, is represented by Catherine
 13 McGahey, Queen's Counsel.

14 National Counter-terrorism Policing Headquarters is
 15 represented by Matthew Butt.

16 North-West Fire Control is represented by
 17 Robert Smith Queen's Counsel, instructed by
 18 Ward Hadaway.

19 SMG is represented by Andrew O'Connor
 20 Queen's Counsel instructed by DLA Piper.

21 The Crown Prosecution Service, CPS, is represented,
 22 as I've already indicated, by Duncan Penny Queen's
 23 Counsel.

24 Sir, that, as we understand it, is the list of all
 25 legal representatives here today. If we've missed

1 anyone off, we're sorry.

2 Before we proceed further, would you please formally
 3 recognise, for the purposes of the Act, each legal
 4 representative listed in the document in your bundle?

5 SIR JOHN SAUNDERS: Those are found in my bundle and
 6 I recognise those representatives.

7 MR GREANEY: Thank you very much indeed, sir. That's
 8 a formal step that needed to be taken.

9 Next we'll turn to deal with developments that have
 10 occurred in the case since the summer.

11 On 29 July this year, the fourth pre-inquest review
 12 hearing took place. At that hearing you, sir, sitting
 13 as coroner, determined that Article 2 was engaged and
 14 ruled as to the scope of the inquests, having made
 15 provisional rulings on both issues at earlier hearings.
 16 Furthermore, a timetable was set for resolution of the
 17 PII claim that had been made by the Home Secretary and
 18 Counter-Terrorism Policing North-West. In the period
 19 since that hearing the following has occurred.

20 A hearing to determine the claims for PII took place
 21 before you, sir, initially in open, but then in closed
 22 session, on 6 September. By a ruling dated
 23 13 September, you upheld the claims for PII and went on
 24 to express a provisional view that an adequate
 25 investigation addressing fully the statutory questions

1 set out in section 5.1 of the Act of 2009, read together
 2 with section 5.2 and bearing in mind, therefore, the
 3 obligations under Article 2 of the Convention, could not
 4 be conducted within the framework of the inquests.

5 In your ruling you expressly invited submissions on
 6 what we have described as "the inquests/inquiry issue".
 7 Thereafter, submissions were received from many
 8 interested persons, as they then were. Those were
 9 received between 18 and 23 September.

10 The general thrust of those submissions was all in
 11 one direction and that thrust was that you should write
 12 to the Home Secretary as soon as possible, inviting her
 13 to order that the inquests should be converted, to use
 14 the shorthand, into a statutory public inquiry.

15 Sir, you agreed with the position of the interested
 16 persons. As a result, you wrote to the Home Secretary
 17 on 27 September, inviting her to establish a public
 18 inquiry.

19 On 22 October, the Home Secretary established
 20 a public inquiry and appointed you to chair it. The
 21 setting-up date for the purposes of the Inquiries Act
 22 was the same date, that is to say 22 October.

23 Then on 5 November, the Home Secretary made
 24 a determination under section 40(4) of the Act.

25 Sir, that then brings us up to date, but before we

1 deal with the first item on the agenda, there are two
2 points to make about the recent developments.

3 First, throughout the period that we've just set
4 out, the work of the inquiry legal team in gathering
5 evidence, making disclosure and otherwise preparing for
6 the oral evidence hearing has been ongoing without delay
7 so as to ensure that the oral evidence hearings are able
8 to start on 6 April. Sir, it is, we know, your very
9 strong determination that that date must be met.

10 Second, the consequence of your PII ruling is that
11 some evidence -- and we emphasise "some" -- will be
12 heard in closed session. We, as CTI, acknowledge that
13 that is liable to cause concern, suspicion and even
14 distress. What everyone must understand, however,
15 is that you have not ruled in this way out of a desire
16 to keep information from the public or the bereaved
17 families, or in order to protect the police and security
18 service from scrutiny. Indeed, nothing could be further
19 from the truth.

20 The reason why closed hearings have to take place in
21 this case was explained by you in your open judgment on
22 the PII claims and what you said, sir, in one passage
23 was as follows -- and I quote:

24 "I am satisfied having [you said], having heard the
25 justifications for them [namely the claims] that to make

13

1 public those matters would assist terrorists in carrying
2 out the sort of atrocities committed in Manchester and
3 would make it less likely that the Security Service and
4 counter-terrorism police would be able to prevent them."

5 Sir, that is what you said.

6 That is why there must, in this case, be closed
7 hearings. It is because to deal with that material and
8 that material only in public would help terrorists to
9 carry out the very type of attack that stole 22 innocent
10 lives on 22 May 2017 and would make further attacks more
11 likely, that being the very opposite of what we hope to
12 achieve through this process.

13 What we as CTI wish to ensure everyone is that in
14 the closed hearing the conduct of the police and
15 security services will be subject to the closest
16 possible scrutiny and, to the extent possible, your
17 findings on those issues will be reported publicly in
18 your open report.

19 So sir, before we turn to the agenda items, we know
20 that you have some remarks of your own to make about
21 what I have just said.

22 SIR JOHN SAUNDERS: Thank you, Mr Greaney. Some of the
23 things I'm going to say will cover some of what
24 Mr Greaney has already said, but I want to say it for
25 myself.

14

1 Because this is the first hearing since the
2 conversion to an inquiry, I hope that it might help if
3 I briefly explain how this has come about.

4 In the course of their inquiries, my team were shown
5 material by the government which was relevant to matters
6 in scope in the inquest. That material would, in the
7 normal course of events, have been released to the
8 interested persons in the inquest, including the
9 families.

10 The government claimed in relation to some of that
11 material that it should not be released further than to
12 me because to do so would harm national security. In
13 this case, that meant that it would make it easier for
14 terrorists to carry out successful attacks if that
15 material was made public, potentially resulting in the
16 loss of many more lives. I had to decide whether, on
17 the evidence that I heard, that claim was justified and
18 whether it outweighed the interest in open justice.

19 There are strict legal rules that I had to apply in
20 making that decision and, having applied those rules,
21 I concluded that the claim not to reveal that material
22 in public was made out.

23 Having reached that conclusion, the next decision
24 that I had to make was whether it was possible for there
25 to be a proper detailed and rigorous inquiry into what

15

1 happened on 22 May and why, which included what was
2 known by the authorities about Salman Abedi, and whether
3 anything could have been done to prevent the attack
4 without allowing that material to be considered as part
5 of an inquest which would have to be in public.

6 This, at this stage, is where my decision differed
7 from the decision of the Chief Coroner, which he made
8 in the Westminster and London Bridge inquests.

9 I make it abundantly clear that he was making his
10 decision on entirely different facts, which must always
11 be taken into account, and I have no doubt that his
12 decision was correct on the facts of those cases. He
13 also decided in those inquests that certain material
14 which had been revealed to him should not be made public
15 and it could not therefore be part of the inquest, but
16 he decided on the facts of his cases that it was
17 possible to have a proper and rigorous inquiry and reach
18 proper conclusions without including that information in
19 the hearings.

20 If we had gone on with the inquest, it would have
21 been without the information which the government had
22 argued successfully couldn't be made public because of
23 the risk to national security that that would involve.
24 Having seen the material, I did not consider that
25 a proper rigorous and detailed investigation could take

16

1 place without consideration of that material;
 2 consideration of that material, for reasons I have
 3 given, could only be done in private.
 4 I am not the only person who has reached that
 5 conclusion. The Intelligence and Security Committee of
 6 Parliament, which carried out an investigation into
 7 what was known about Salman Abedi before the attack,
 8 were unable to reveal a large amount of what they had
 9 heard in evidence before them. They redacted large
 10 amounts of their report in making it public, while at
 11 the same time expressing their desire to put as much
 12 information in the public domain as they could,
 13 consistent with not endangering national security.
 14 I am sorry that the families will not be able to
 15 hear all the evidence, but I'm afraid that is
 16 a necessary legal consequence of our process. It is,
 17 however, in my view, the only way in which a proper,
 18 rigorous examination of what was known about
 19 Salman Abedi and what, if anything, could have been done
 20 to prevent the attack, is the only way that can be
 21 properly investigated. I would like to assure everyone
 22 that I will do my very best that such a rigorous
 23 examination will take place by me.
 24 Thank you.
 25 Mr Weatherby.

1 MR WEATHERBY: May I just make some comments? They're
 2 related to paragraphs 11 onwards in our written
 3 submissions.
 4 SIR JOHN SAUNDERS: Yes.
 5 MR WEATHERBY: Can I say that the families, obviously,
 6 understand the imperatives of national security and the
 7 concerns of nothing being done which could lead to any
 8 greater risk of atrocities in the future.
 9 However, Mr Greaney is right that many of the
 10 families are concerned about whether those core
 11 participants, particularly the Security Service and the
 12 police, whether they will be properly brought to account
 13 for any failings that may have occurred. So that is
 14 a true concern and Mr Greaney is right to raise it.
 15 In our written submissions we have asked for some
 16 further detail, which we consider and we submit to you
 17 are details which can properly be provided, which may
 18 give some reassurance to those families who have the
 19 concerns.
 20 In particular, the two things that we seek at this
 21 point is the total number of documents that have been
 22 withheld as a result of the public interest immunity
 23 ruling and, so far as is possible, to give an indication
 24 of which topics under the terms of reference those
 25 documents are related to. I recognise that will not

1 tell the families an awful lot, but it will indicate the
 2 extent to which their exclusion from the investigations
 3 in that regard will be.
 4 Can I just raise one further point whilst I'm on my
 5 feet? It's related but not directly on that point. Can
 6 we just flag up that from previous experience, the
 7 closed hearings -- and just so that everybody
 8 understands, a closed hearing is a hearing which will
 9 look at relevant evidence which has not been disclosed
 10 because of the public interest immunity ruling and what
 11 will become a section 19 ruling.
 12 That material, of course, as has just been said, has
 13 not been disclosed to the families or to their lawyers.
 14 So, so far as it is relevant to the investigation,
 15 you will then go into closed hearing with your lawyers
 16 and the lawyers for whichever core participants are
 17 related to that material, whether it'll be MI5 or
 18 counter-terrorism police, predominantly those two.
 19 We note that in other proceedings it has been
 20 possible at the end of each of the closed hearings for
 21 consideration to be given to gisting the evidence that
 22 has been heard in closed hearing.
 23 I recognise that that may not be possible in some
 24 circumstances, but it may in others. I give
 25 a completely contrived example. This is not based,

1 I make it clear, on anything to do with this case.
 2 If the purpose of withholding a particular piece of
 3 information was because to air it would bring to public
 4 attention the existence of a informer and thereby put
 5 that person at mortal risk, then it may be, having heard
 6 that evidence in closed hearing, that elements of the
 7 evidence that's come out may well be able to be gisted,
 8 a gist being a summary of that evidence, which can then
 9 be put into open and the families and their lawyers and
 10 the general public and the media can then see it.
 11 So I flag up that we will return to that in due
 12 course, but I make the submission about the disclosure
 13 of the extent of the material now. Thank you.
 14 SIR JOHN SAUNDERS: Okay. Can I just say something
 15 in relation to that. I think I can properly say, having
 16 seen the material, that the number of issues to which
 17 the closed material relates is relatively few. That
 18 will not necessarily be reflected, I have no idea,
 19 in the number of documents, because a number of
 20 documents can cover the same piece of material.
 21 So while, obviously, consideration will be given to
 22 meeting Mr Weatherby's request, I'm just concerned that
 23 a false impression shouldn't be given by simply giving
 24 a number of items of material, which may actually not
 25 reflect the number of issues. But we do not anticipate,

1 I think, at the moment, that closed hearings will take
2 that long, because the number of issues is relatively
3 small which will have to be considered.

4 As to gisting, again, anything that can be gisted
5 will be gisted. Again, I am very happy to have
6 submissions from any of the parties as to the way in
7 which some sort of material -- you will have some idea
8 of the generic sort of material which could be
9 concerned, as to how that could be properly gisted.

10 As far as the concerns of the families, all I can do
11 is say that I will hold a completely rigorous and
12 detailed inquiry; I am just sorry that they will not be
13 able to see it take place.

14 MR GREANEY: Thank you, sir.

15 May I just add three short points to what you have
16 just said? First of all, we have read paragraphs 11 to
17 15 of Mr Weatherby's submissions. It seemed to us that
18 it was reasonable and understandable that he raised that
19 request.

20 We entirely agree with you, sir, that there is
21 a risk that simply identifying the number of documents
22 will be misleading without further information which
23 could not be provided. But nonetheless, but may we
24 suggest that within 14 days we will respond formally to
25 those paragraphs of Mr Weatherby's submissions.

21

1 SIR JOHN SAUNDERS: It may be that others will wish to
2 respond to them as well who are concerned with it and it
3 may be the government would wish to put in some
4 submissions in relation to those matters as well.

5 MR GREANEY: Sir, that was the reason why we suggested
6 14 days because others will undoubtedly have to be
7 consulted, given the sensitivities concerned.

8 Secondly, the suggestion that particular points
9 within the closed hearings consideration should be given
10 to whether material can be gisted is, we respectfully
11 agree, a sensible one and we will do that.

12 Thirdly, insofar as it provides any reassurance, and
13 it probably will not provide a great deal, the core
14 participants should not understand that all of the
15 evidence in relation to the issues which will
16 principally be considered in the closed session will be
17 closed.

18 There will, for example, still be a witness who will
19 come to give evidence from the Security Service about
20 those matters which can be dealt with in open. So there
21 will be an opportunity, limited though we acknowledge it
22 will be, for the core participants to scrutinise those
23 witnesses.

24 So, sir, we'll turn next then to the items that are
25 on the agenda. The first broad topic is the

22

1 establishment of the inquiry and the first sub-heading
2 is the terms of reference of the inquiry.

3 Ahead of the second pre-inquest review hearing, your
4 counsel, sir, filed two sets of submissions. In the
5 first, dated 16 January of this year, we set out at
6 paragraph 28 our submissions as to scope. In the second
7 set of submissions, dated 21 February, at paragraph 6,
8 we indicated that the investigation of whether Prevent
9 referrals should have been made in respect of
10 Salman Abedi and/or in respect of any of his family
11 members should be within the scope of the inquests.

12 At the hearing on 28 February, you provisionally
13 ruled in favour of all of those submissions without
14 opposition from any interested person and on 29 July you
15 made a final ruling, sir, to that effect.

16 The Home Secretary has set out the terms of
17 reference of this inquiry pursuant to section 5 of the
18 Act. Those terms of reference, as everyone will
19 appreciate, replicate precisely the scope of the
20 inquests as I have just explained them, save in one
21 respect. That respect is that there should be omitted
22 from the published -- and I underline the word
23 "published" -- terms of reference the reference to the
24 question of whether Prevent referrals should have been
25 made in respect of the family of Salman Abedi.

23

1 That is the only difference between the published
2 scope and the published terms of reference.

3 It is plain from the submissions made in writing by
4 Mr Weatherby, dated 15 November, that this has caused
5 some understandable confusion and concern, but we are
6 able to set minds at rest.

7 As we've indicated already, at the fourth
8 pre-inquest review hearing, concern was expressed that
9 to publish the fact that the question of whether Prevent
10 referrals should have been made in respect of family
11 members of Salman Abedi, including of course
12 Hashem Abedi, might prejudice the trial of Hashem Abedi.

13 So an order was made pursuant to section 4.2
14 postponing any reporting of the fact that that issue was
15 in scope, and that order, of course, remains in place.

16 The position of the Home Secretary, as we have
17 understood it, is that that concern about potential
18 prejudice remains and that, for the time being, the safe
19 course is for the terms of reference, as published, to
20 omit the reference to Prevent referrals and other family
21 members.

22 However, as we have read the letter, the
23 Home Secretary has indicated in the clearest terms that
24 she firmly believes that the inquiry should investigate
25 all of the matters that were determined by you, sir, to

24

1 be within the scope of the inquests, including the
2 Prevent referral issue in its full form.

3 Accordingly, so long as we're correct in our
4 understanding, the core participants should have no
5 doubt that this issue will be explored in the evidence
6 at the inquiry.

7 Furthermore, in the meantime, the cautious approach
8 that is being adopted to publication will have
9 absolutely no impact on disclosure or on any other
10 aspect of the preparation for the inquiry. The concerns
11 that have been expressed, whilst understandable, are, on
12 analysis, without foundation.

13 Finally under this heading, we are able to confirm
14 that the terms of reference will -- and we were invited
15 by Mr Weatherby to confirm this -- be deemed to include
16 the purposes set out in sections 5.1 and 5.2 of the
17 Coroners and Justice Act 2009, so the statutory
18 questions that an inquest would be required to
19 investigate.

20 Having set out our position, we hope clearly, we
21 invite submissions in the following order. First of
22 all, Ms McGahey to confirm, if she is able to, whether
23 or not our understanding of the Home Secretary's
24 position is correct. Secondly, Mr Weatherby to set out
25 whether we have been able to set his mind to rest on

25

1 this issue at least. And thirdly from any other core
2 participant who wishes to address you on this topic.

3 MS MCGAHEY: Sir, the process of making an addition formally
4 to the terms of reference does require the
5 Home Secretary to consider the matter and inform
6 Parliament and that can be done, obviously, after the
7 trial or at any point at which it's considered that no
8 prejudice would arise. But yes, it is the
9 Home Secretary's understanding that that issue is within
10 scope.

11 SIR JOHN SAUNDERS: I think this whole matter arose because
12 of the concern at the last hearing of making public
13 something which might indicate that Hashem Abedi should
14 have been referred to Prevent --

15 MS MCGAHEY: Yes.

16 SIR JOHN SAUNDERS: -- which is clearly capable of having
17 a prejudicial effect on the trial and I would imagine
18 Mr Penny would confirm --

19 MS MCGAHEY: Yes.

20 SIR JOHN SAUNDERS: Mr Weatherby.

21 MR WEATHERBY: A small point, sir, I'm grateful for the way
22 Mr Greaney has dealt with it.

23 Which Home Secretary?

24 SIR JOHN SAUNDERS: I'm not sure I know the answer to that.

25 MR WEATHERBY: The problem that arises here is in fact that

26

1 this is not presented by the Home Secretary as
2 a reporting issue. It's actually omitted from the terms
3 of reference and Ms McGahey is entirely correct that the
4 Home Secretary will have to revisit it and add it back
5 in. So with respect, I don't think it's in anyone's
6 gift that that will happen.

7 It's a small point, I suspect it will be put back
8 in, but that's why we raise it. It's a point which
9 directly relates to the Home Office, so a different view
10 could be taken as to whether Prevent should be included
11 in the scope of this for reasons which I think are
12 common knowledge.

13 SIR JOHN SAUNDERS: I expect the explanation is that once
14 it's in the terms of reference, there's then a risk it
15 will be published, it being part of the terms of
16 reference. I think we can rely on the fact that
17 whichever Home Secretary is in office, he or she will be
18 prepared to put this back in. I can't imagine there
19 will be any difficulty. If there is, I will obviously
20 take it up with the Home Secretary.

21 MR WEATHERBY: It's a small point, but I just thought it was
22 important to raise it.

23 Can I just -- before I sit down -- this does arise
24 from concerns that are raised by the CPS with the
25 Home Office, which are not communicated to us. It would

27

1 be very helpful if the other core participants who are
2 involved in these issues could factor in the families.
3 It's very important that the families understand what's
4 going on here, and an explanation, a short explanation,
5 from the CPS would, I guess, in this circumstance at
6 least, have been entirely accepted by the families and
7 wouldn't have led to any further problem. But it is
8 a difficulty where issues are being raised and then the
9 families come to us and say, "Why is this being done?"
10 and we can't answer them.

11 SIR JOHN SAUNDERS: I do understand there are difficulties
12 about communication generally, which you've raised in
13 other parts of your submissions, and no doubt the Crown
14 Prosecution Service will take what you have said on
15 board, and how important it is, as far as possible, to
16 keep core participants in the loop.

17 MR WEATHERBY: Thank you.

18 SIR JOHN SAUNDERS: Does anybody else want to say anything?

19 MR GREANEY: Thank you, sir, I'll move on to the second
20 issue under this heading, which is the designation of
21 core participants. This is not a topic again which will
22 take very long to deal with.

23 The inquiry's published protocol for considering
24 applications for core participant status makes clear in
25 paragraph 6 that:

28

1 "Any individual or organisation designated as an
2 interested person in the inquest will be deemed to have
3 met the criteria in rule 5 and shall, without the need
4 for a further written application, be designated as
5 a core participant in the inquiry."

6 That is why we have referred to organisations and
7 individuals as previously having been interested persons
8 but now as being core participants.

9 So far as others who don't fall into that category
10 are concerned, the protocol provides as follows.
11 Applications for core participant status should be
12 submitted to the inquiry in writing by 20 November, so
13 earlier this week. Further time will be granted by the
14 chairman for such applications if it is necessary and
15 appropriate to do so.

16 The only application for core participant status
17 received, sir, by your team to date is from NHS England,
18 and that application has been circulated widely.

19 In short, NHS England seeks designation on the basis
20 that it played a role in the emergency response to the
21 bombing and that it may be criticised.

22 As we understand it, NHS England is the overarching
23 body with responsibility for the Greater Manchester
24 Health and Social Care Partnership and the Manchester
25 University NHS Foundation Trust, which together treated

29

1 many of those injured in the attack, along with three of
2 those who died.

3 On that basis, CTI considers, sir, although it's
4 a matter for your judgment ultimately, that this
5 application by NHS England satisfies rule 5.2 of the
6 inquiry rules and we invite you to make a designation.

7 Sir, on this topic we invite submissions only from
8 any core participant who opposes that course, if any.

9 SIR JOHN SAUNDERS: Mr Fullwood, the interrelation between
10 NHS and the ambulance service, if any?

11 S:MR FULLWOOD: It's very limited. We are a separate body.

12 We refer to them and work closely with them, but that's
13 as far as it goes.

14 SIR JOHN SAUNDERS: You won't be covering the same issues?

15 S:MR FULLWOOD: No.

16 SIR JOHN SAUNDERS: Thank you.

17 If there's no objection to that, then clearly they
18 should have core participant status.

19 MR GREANEY: Thank you very much, sir.

20 Next, a short but important topic, the live
21 streaming of the oral evidence hearings.

22 Section 18 of the Act requires that you, sir, must
23 take such steps as you consider reasonable to secure
24 that members of the public, including reporters, are
25 able to attend the inquiry or to see and hear

30

1 a simultaneous transmission of the proceedings at the
2 inquiry. This, of course, is subject to any restriction
3 orders or notices that may be imposed.

4 CTI's provisional view is that the oral evidence
5 hearings must be live-streamed. This means that the
6 evidence would be available to be watched on a link via
7 the inquiry's website for whoever wished to follow the
8 proceedings. Not only would adopting this approach
9 ensure compliance with section 18, but it will also
10 enable any person who wishes to follow the proceedings,
11 but is unable to attend the hearing venue or does not
12 feel able to do so to remain engaged with what is
13 happening. That, sir, we regard as an important matter.

14 However, we recognise that it may not be appropriate
15 for the evidence of some witnesses to be live-streamed.
16 For example, because it is sensitive or distressing, and
17 that it is likely to be necessary, as with other public
18 inquiries, that any live-streamed evidence be subject to
19 a short delay before it is broadcast. That will, for
20 example, ensure compliance with any restriction orders
21 put in place.

22 So, sir, again we would invite submissions from any
23 core participant who wishes to take issue with that
24 provisional view of CTI or who wishes to make any
25 submission in support.

31

1 MR WEATHERBY: Generally in support. We're still taking
2 instructions about the more sensitive sides to it, which
3 Mr Greaney has referred to.

4 SIR JOHN SAUNDERS: Mr Weatherby, just before you finish, it
5 does occur to me that, for example, with some of the pen
6 portraits, it may be some of the families would not want
7 them live-streamed. I have no idea. Can I make it
8 clear, as far as I'm concerned, that will be entirely
9 a matter for them. If they didn't want it
10 live-streamed, I'd be very sympathetic to such an
11 application.

12 MR WEATHERBY: Thank you very much. There are, obviously,
13 other areas of sensitivity and we'll put in some
14 submissions in due course. But generally in support.

15 SIR JOHN SAUNDERS: Absolutely, thank you.

16 Mr Jamieson.

17 MR JAMIESON: Thank you sir.

18 Just briefly on behalf of the Slater & Gordon
19 families, if I can use that umbrella term. Sir, you
20 know that we represent 11 families, who you will
21 understand, have a disparity of degree of ability to
22 engage and indeed a disparity of some view about those
23 matters.

24 All I say at this stage, please, is we agree with
25 the principle that there ought to be live streaming, but

32

1 we would welcome time to take instructions and to
2 advance any particular submissions, broadly on the
3 topics of delay, sensitivity of particular evidence, and
4 indeed the manner in which the broadcast footage might
5 be available. But I think that's all I need to say
6 today.

7 SIR JOHN SAUNDERS: Well, you have it. You may come back at
8 any time when you have had a chance to consider it
9 properly.

10 MR JAMIESON: Thank you.

11 MR GREANEY: Thank you very much for those submissions.

12 Next, then, before we turn to suspension of the
13 inquests, a venue update.

14 By an email dated 15 July, the solicitor to the
15 inquiry updated the interested persons about progress on
16 venue in the following terms. He said:

17 "Work is underway, subject to plans being approved,
18 to convert an area within Manchester Magistrates' Court
19 for use as a hearing venue for the inquests. The
20 Magistrates' Court building in centrally located in
21 Manchester, near to the Civil Justice Centre and
22 opposite the Crown Court. The work will include
23 converting two courtrooms to make a large hearing space.
24 Two further courtrooms in the Magistrates' Court will be
25 made available for the oral hearings to be live-streamed

33

1 to those courtrooms. The building work to convert this
2 space for the inquests is likely to take some months and
3 an update will be provided in due course."

4 Of course, at that stage, the solicitor to the
5 inquiry was referring to inquests, but that now applies
6 to the inquiry. We will use precisely the same location
7 for the oral evidence hearings for the inquiry.

8 Moreover, since that email, much work has been done
9 to redesign the space at the Magistrates' Court to
10 ensure it is fit for the inquiry's purposes. The
11 building works are expected to be complete in good time
12 for the start date of 6 April. So that will be no
13 impediment to starting on that date.

14 You, sir, have also secured space in a conference
15 centre very close to the Magistrates' Court. This will
16 provide additional and private facilities for the
17 bereaved families. It is anticipated that this
18 conference facility will provide breakout and meeting
19 rooms for families. It will have a live stream of the
20 evidence and access to counselling and support services,
21 which will also be available at the court itself.

22 The arrangements, sir, for hiring that space are
23 still being finalised, but I expect that more details
24 will be circulated in the very near future.

25 Before inviting submissions on this issue, if there

34

1 are any, we would like to recognise publicly the work
2 done by Mick Collins, secretary to the inquests, and
3 Sue Curran on the issue of venue and indeed more
4 generally. Their work, may we say as CTI, and their
5 effort has been quite outstanding and without them
6 we have no doubt that we would not have made the
7 progress that we have made.

8 SIR JOHN SAUNDERS: I endorse that. It's not easy finding
9 a suitable venue which is in the centre of Manchester
10 which is going to be convenient to everybody.

11 The first choices were not instantly available, so
12 it has been necessary to go to quite a lot of trouble to
13 try and find it, so I'm also grateful.

14 MR GREANEY: Thank you very much, sir.

15 I don't know whether any other core participant
16 would wish to make any submissions on this particular
17 issue. I don't see anyone volunteering to do so.

18 SIR JOHN SAUNDERS: Perhaps I should say this: it will be
19 a miracle indeed if everything is ideal, but we have
20 done absolutely everything we can so far, but obviously
21 we will do our best to adjust to anything which becomes
22 apparent if there's any shortcomings in what is
23 provided.

24 MR GREANEY: Well, sir, indeed, and you and members of your
25 counsel and solicitor team, of course, have visited the

35

1 premises and we have had an input into what they will
2 look like when finally they are ready for us.

3 SIR JOHN SAUNDERS: Can I say I have no imagination for how
4 places look like, so if anything doesn't work out, it is
5 entirely your fault, Mr Greaney, not mine!

6 MR GREANEY: I thought you might say that!

7 Sir, I'm going to move to the second broad heading,
8 the suspension of the inquests, a short but important
9 topic. The solicitor to the inquiry explained the
10 position in the following way in the detailed update
11 note of 11 November.

12 Mr Suter said:

13 "Whilst the administrative arrangements for the
14 inquiry are still being established by the Home Office,
15 the inquests have not yet been suspended under
16 schedule 1 of the Coroners and Justice Act 2009. Absent
17 any objection from interested persons in the inquest,
18 it is anticipated that the process of suspension will be
19 done as a procedural matter on the papers."

20 So far as the administrative arrangements referred
21 to in the note are concerned, we can confirm that
22 a positive planning meeting took place between counsel
23 to the inquiry, solicitor to the inquiry, and indeed
24 you, sir, on the one hand, and the Home Office officials
25 on the other hand, in October, and STI have established

36

1 a cooperative working relationship with the
 2 Home Department, so things are running relatively
 3 smoothly.
 4 All we invite at this stage are any submissions on
 5 the proposal to suspend on paper once all is in hand, if
 6 there are any.
 7 Mr Weatherby has told me that he agrees, and I'll
 8 take it that everyone else does too.
 9 So sir, the third and final broad topic, subject to
 10 any other business, we're now moving into areas which
 11 are to some extent more controversial: an update on the
 12 investigation, disclosure and experts.
 13 Heading 1: general update. On a regular basis, the
 14 solicitor to the inquiry has provided updates to the
 15 core participants on the issues of investigation,
 16 disclosure and experts. The most recent note is that
 17 I have just mentioned, namely that dated 11 November.
 18 I do not propose to set out the content of that note in
 19 full bearing in mind that everyone has had it or had
 20 access to it, but I'll summarise the principal points as
 21 follows.
 22 The position remains that you, sir, intend to
 23 disclose, as far as it is possible and subject only to
 24 the exceptions referred to in paragraph 17 of the update
 25 note, all relevant materials in your team's possession

1 to core participants by 20 December. So that was a date
 2 that we set ourselves at an early stage in the
 3 proceedings and we are still confident of working to
 4 achieve that date.
 5 However, if that date is to be achieved, those
 6 involved in the sensitivity checking process, so
 7 checking the documents to ensure they create no risk of
 8 prejudice to the trial of Hashem Abedi, if that date is
 9 to be achieved, those involved in that process will need
 10 to continue to work with the endeavour that has been
 11 shown so far and for which we're grateful.
 12 Those responsible for that process are being given
 13 deadlines for completion of their checks and, where
 14 necessary, further directions will be sought from you,
 15 sir, if there are delays or problems with processing the
 16 materials.
 17 Where the work of the inquiry legal team has
 18 identified that other organisations or individuals may
 19 have possession of relevant material, requests for
 20 disclosure have been made. Indeed, six such further
 21 requests have been made since 4 October. So just to
 22 explain, as everyone will understand, as disclosure
 23 comes into the inquiry, it is considered with great
 24 care. Sometimes it becomes obvious from that material
 25 that there are other materials from other providers that

1 we should seek and when we spot that, we act upon it.
 2 So far as experts are concerned, the solicitor to
 3 the inquiry has issued letters of instruction to the
 4 police, ambulance and fire experts for their reports on
 5 the command and control of the emergency response to the
 6 arena attack, and in a few moments I'll move on to
 7 a potential issue with the provision of the police
 8 expert report.
 9 You, sir, have instructed two security experts,
 10 Richard Latham and David BaMau
 11 The overview reports of the blast wave experts has
 12 now been disclosed to all core participants. Those
 13 experts have not yet seen the sequence of events
 14 presentations that are being prepared by GMP. Once
 15 those are finalised, the blast wave exports will review
 16 their overview report and, as necessary, they will be
 17 asked to prepare further reports on what have been
 18 described as issues of survivability.
 19 To the list that the solicitor to the inquiry gave
 20 in his note, we can add that a decision has been made to
 21 instruct an expert to assist with evidence on the
 22 process of radicalisation into Islamic extremism and
 23 associated issues, which obviously is relevant to
 24 Salman Abedi, how he behaved and what he did.
 25 An expert, following a process of speaking to

1 a number of experts, has been identified and his
 2 details, I'm confident, will be circulated shortly.
 3 So I don't propose, having summarised the matters
 4 set out in the note, to invite submissions upon
 5 disclosure at this stage. I'll invite them once we've
 6 dealt with the trial of Hashem Abedi and the disclosure
 7 of prosecution material, so I'll turn to that
 8 sub-heading next.
 9 At the hearing or at a hearing in the criminal
 10 proceedings on 22 October, as I've indicated already,
 11 the start date for the trial of Hashem Abedi was put
 12 back from November to 13 January of next year. The time
 13 estimate is six to eight weeks. On that basis, the
 14 trial will conclude by, our calculations, at some stage
 15 between 21 February and 6 March.
 16 Mr Weatherby is correct to observe, as he did in his
 17 written submissions, that that does not leave much time,
 18 even if things go to plan, between the end of the trial
 19 and the start of the inquiry.
 20 However, the following should, in our view, limit
 21 the impact of that timescale. I should say what is
 22 capable of causing an issue, the issue identified by
 23 Mr Weatherby, is that until the trial has concluded,
 24 with verdicts, there will be some material,
 25 trial-sensitive material, that cannot be disclosed to

1 core participants . But as I was about to set out and
2 will now set out, the problems presented by that will be
3 ameliorated by a number of factors, which are these.

4 The core participants will know what evidence is
5 given at the trial and have access to transcripts of
6 that which is relevant to the terms of reference of the
7 inquiry. That is because junior counsel will attend
8 every day of the trial on behalf of the inquiry legal
9 team.

10 Each Monday at 4 pm, the solicitor to the inquiry
11 will circulate a note, which contains counsel's summary
12 of all the evidence given during the preceding week,
13 together with an indication of which parts of the
14 evidence it is proposed to disclose transcripts of.

15 Then two days later, so each Wednesday at 4 pm, the
16 solicitor to the inquiry will disclose the transcripts
17 mentioned or that I have just mentioned, but any core
18 participants who considers that any additional parts of
19 the evidence should be transcribed is free to apply to
20 you, sir, in writing, and if they wish to do so, they
21 should give reasons and apply by 4 pm of the Friday of
22 that week.

23 So I suspect I have probably expressed that with
24 insufficient clarity . Each Monday, there will be a note
25 which sets out evidence that 's been heard and indicates

1 which transcripts we consider should be disclosed . Each
2 Wednesday, we will disclose those transcripts that
3 we have identified . Each Friday, any core participant
4 who thinks that any other part of the evidence should be
5 transcribed should indicate why in writing and with
6 reasons.

7 So that is the first reason why the potential
8 problem with delayed disclosure will be ameliorated to
9 some extent.

10 Secondly, it should not be thought that none of the
11 material in the prosecution case will be disclosed until
12 the trial is over. Indeed, on the contrary, some
13 material within this category has already been disclosed
14 and we expect that to continue. Where material has not
15 been disclosed, that is the result of a specific
16 sensitivity assessment. So that is to say it is not
17 a blanket prohibition on any of the prosecution
18 materials coming to core participants before the
19 conclusion of the trial , there is a specific assessment
20 made of the material and some is disclosed, some is not,
21 because of the risk that it would create prejudice.

22 The way in which Mr Suter explained it in the update
23 note was as follows:

24 "Although the delay to the trial will inevitably
25 mean that not all of the prosecution material will be

1 disclosed until a few weeks before the start of the
2 inquiry, we will continue to work with GMP and the CPS
3 to ensure that any materials which can be disclosed
4 sooner are provided to all core participants . We will
5 endeavour to provide as much information as possible to
6 assist with and manage the disclosure to be provided
7 after the conclusion of the trial ."

8 So before we invite submissions, may we acknowledge
9 that the core participants would all wish to have all of
10 the prosecution case material now or within a very short
11 time of this hearing, but our considered view is that
12 there are good reasons why some of that material cannot
13 be provided to core participants now because of the risk
14 that prejudice would be caused to the trial .

15 The principal responsibility for the sensitivity
16 checks of this material has fallen upon the Crown
17 Prosecution Service, with whom we have worked closely,
18 and we are satisfied that they have adopted an entirely
19 responsible and proportionate approach to that task.

20 So sir, having made those observations --

21 SIR JOHN SAUNDERS: Just before we do that, this is
22 a detail, but I gather that LiveNote is going to be
23 taken and provided during the trial .

24 MR GREANEY: We.

25 SIR JOHN SAUNDERS: We talk about transcripts being made; is

1 it actually necessary for transcripts to be made to
2 start with or can it simply be done by electronically
3 sending out the material?

4 MR GREANEY: That's a very good question, to which I wish
5 I had a certain answer. I would have thought that the
6 material can be provided electronically on the Wednesday
7 of each week. Mr Suter is nodding his head.

8 The reason why we are not proposing to supply the
9 entire transcript is because there will inevitably be
10 some material that is adduced at the trial which is
11 wholly irrelevant to the issues that we have to
12 consider.

13 For example, the movements of Hashem Abedi, no
14 doubt, will be the subject of extensive cell site
15 analysis and expert evidence. By the time we come to
16 deal with our oral evidence hearings, I would have
17 thought all of those issues would be completely agreed
18 so that pages and pages and pages from the cell site
19 analysts will not assist anyone.

20 Sir, to answer your direct question, we will ensure
21 that hard copies are not provided, but copies are
22 provided electronically .

23 SIR JOHN SAUNDERS: Thank you.

24 MR GREANEY: The sensible order for submissions, subject to
25 your view on this topic, seems to us to be, first of

1 all , from Mr Weatherby, who's made observations very
2 helpful observations in writing. Then from Mr Penny, if
3 he has any, and then from any other core participant .

4 SIR JOHN SAUNDERS: Mr Weatherby.

5 MR WEATHERBY: Yes, thank you very much, and thank you for
6 that update, Mr Greaney.

7 Can I preface my comments by saying that of all of
8 the people in this room and elsewhere who are most
9 concerned about not prejudicing this trial or doing
10 anything to interfere with it, it is of course the
11 families . So there's nothing that I have advanced or am
12 going to advance that in our submission risks any
13 prejudice to that trial . Absolutely not.

14 On 29 July, I made a submission to you, sir , about
15 this issue and I asked for disclosure of the prosecution
16 used material. May I just explain what I mean by that?
17 I know it'll be familiar to you but not to others.

18 I sought only that material that would be provided
19 to Hashem Abedi and his lawyers and the bundles and the
20 summary that were designed by the prosecution to put in
21 the public domain in the public trial .

22 So I wasn't seeking anything that wasn't being
23 advanced by the prosecution to go into the public
24 domain, nor anything that Hashem Abedi himself wasn't
25 going to receive and could in theory disseminate.

45

1 So I carefully limited, in my submission, what I was
2 after . That, of course, would include either a case
3 opening or a case summary, and that would, in our
4 submission, be a helpful document because it would
5 inform the families about what the case against
6 Hashem Abedi is said to be, and it would assist in the
7 overall preparation of everybody, all CPs, including the
8 families . Those are the two issues .

9 Because unremarkably, of course, the families are
10 asking us what the case is about. Secondly, of course,
11 as Mr Greaney has pointed out, the trial , if it goes
12 according to plan -- and often, of course, trials
13 don't -- will only end shortly before these hearings
14 start . Although I hear what Mr Greaney says about how
15 some of the material will come through, it is not clear
16 at all to us what is meant by that and what the extent
17 of the material that'll come through is going to be.

18 I'm sorry to make the same point I made slightly
19 earlier again, but in our written submissions, we did
20 invite the CPS, in advance of this hearing, to provide
21 some reasons -- I actually put "full reasons" but
22 actually "some reasons" would have been more
23 appropriate -- as to why material needed to be withheld
24 at this stage.

25 I can appreciate that there may well be material

46

1 which is subject to dispute, material which may be
2 subject to admissibility arguments, and there may be
3 good reason why it can't be provided at the moment, but
4 nothing is coming through to us in that line at all and
5 therefore we would ask that a sensible approach is taken
6 here and this is revisited .

7 When I made the submission, Mr Greaney indicated
8 that it was "a logical submission to make" at that point
9 and that it was hoped that the CPS would take
10 a realistic approach. That's essentially all that we
11 seek at this stage. So we would invite a review of this
12 and a realistic approach be taken, questioning why
13 disclosure, subject to the strict undertakings we're all
14 under, why that could possibly risk prejudice to the
15 trial . That's what we seek.

16 SIR JOHN SAUNDERS: I think before Mr Penny responds,
17 perhaps I could ask whether there are other CPs who wish
18 to add to any of that so he can deal with everything all
19 in one.

20 MR JAMIESON: Extremely briefly, I echo everything that has
21 just been said, but also another factor that is within
22 the mix and ought to be considered, we submit, in the
23 sensitivity exercise is not just the existence of the
24 undertakings that everybody in these proceedings has
25 provided as to confidentiality , but in fact the point

47

1 that was made at the outset of the hearing about the
2 reporting restrictions in the Abedi trial biting on
3 these proceedings and everything in it .

4 Those protective factors , together with, as has been
5 said and I echo, nobody has a greater interest in that
6 trial proceeding fairly and expeditiously than the
7 families .

8 SIR JOHN SAUNDERS: I accept that entirely . Of course, it's
9 the lawyers and the people who have experience of
10 criminal trials who are actually able to see how things
11 can impact on a fair trial , which is not always apparent
12 to all of us all of the time.

13 MR JAMIESON: Exactly, and I preface this by saying that
14 I am not seeking to step into the shoes of the
15 decision-makers. Of course, they must make that
16 sensitivity exercise that we've known has been part of
17 the disclosure process all along, but I simply ask that
18 those protective factors are given full account, and as
19 my learned friend Mr Greaney Queen's Counsel says, and
20 indeed Mr Weatherby says, a sensible and straightforward
21 decision is arrived at. Thank you.

22 SIR JOHN SAUNDERS: Thank you. Mr Penny, thank you.

23 MR PENNY: Sir, the approach of the Crown Prosecution
24 Service to the used evidence and the non-sensitive
25 unused material which has arisen in this process, in the

48

1 coronial and inquiry process, has been to identify to
2 the inquiry team only a very small body of material in
3 respect of which it considers that further disclosure at
4 this stage, or pre-trial, might prejudice the integrity
5 of the forthcoming trial.

6 The material in question, nonetheless, is in the
7 possession of the inquiry team, with whom the Crown
8 Prosecution Service, as my learned friend has indicated,
9 maintains an ongoing constructive and effective
10 dialogue.

11 The Crown Prosecution Service is committed to
12 ensuring that the bereaved and the injured are as fully
13 informed as is possible within the constraints which are
14 imposed by the law in advance of a contested criminal
15 trial. It should be noted that, as of today's date, no
16 defence statement has been received by the Crown
17 Prosecution Service or the prosecution. This,
18 of course, is something which you, sir, will understand
19 the significance of, the position being that when the
20 trial date was vacated and a new trial date fixed for
21 13 January, a new timetable was set for the management
22 of the case by the trial judge, which set out
23 a timetable, including a timetable establishing service
24 for, amongst other things, a defence statement, a jury
25 bundle index and, in due course, an opening note, an

1 opening note which, as my learned friend rightly
2 identifies, will very likely include matters which are
3 likely to be the subject matter of legal argument as to
4 admissibility within the context of a criminal trial,
5 which nonetheless may form the subject matter, the
6 appropriate subject matter, of this inquiry in due
7 course, but which nonetheless are of significant
8 sensitivity to the delivery of a fair trial in the
9 context of a trial where significant reporting will take
10 place.

11 So as a result of the non-service as yet of the
12 defence statement, the issues in the case have not yet
13 been identified for the purposes of disclosure,
14 disclosure in that sense being disclosure in criminal
15 proceedings under the Criminal Procedure and
16 Investigations Act of 1996 or for the purposes of
17 further case management.

18 That fact in itself has implications for the Crown's
19 ongoing duties in relation to the criminal trial and, in
20 particular, its overarching duty to ensure that a fair
21 trial is delivered in January of next year.

22 Discussions are ongoing with GMP as to the way in
23 which the bereaved and the injured will be informed and
24 briefed in advance as to the nature of the hearings
25 which are forthcoming, the evidence which it is expected

1 will be adduced on a given daily basis, and any other
2 issues which are expected to arise.

3 As noted above, the Crown Prosecution Service
4 remains committed to ensuring that this process is as
5 comprehensive as possible in the circumstances which may
6 arise. It should be noted, however, that those
7 circumstances are necessarily sometimes reactive to
8 events in court and to submissions which are made or
9 received on the defendant's behalf.

10 SIR JOHN SAUNDERS: Right, Mr Penny. I take the view that
11 I don't have the power to direct you to disclose
12 material at this stage which you are saying you can't do
13 as it may affect the trial of Hashem Abedi. Those
14 matters are under the control of Mr Justice Jeremy Baker
15 and he, I think, would have to be informed of anything
16 like that before it happened, and also the defence would
17 also have to have a say in the matters of any disclosure
18 which you're making to the families.

19 I do think communication may be the central issue
20 and if it is the intention of GMP and the Crown
21 Prosecution Service, as you tell me, to inform the
22 families as they can of so much of the nature of the
23 case as they can, what's happening, how it's
24 progressing, perhaps a letter could be written to the
25 families and to their legal representatives, indicating

1 when that is going to happen and so people have some
2 idea of where we're going.

3 MR PENNY: Sir, without going into the detail of it, there
4 has been extensive communication already to that effect
5 in relation to various matters which are to arise as to
6 the practical management of the trial itself. That will
7 be an ongoing process between now and 13 January.

8 SIR JOHN SAUNDERS: Right. Obviously, I am very much wedded
9 to the date of 6 April to start this inquiry.
10 Of course, as everyone will understand, if something
11 happens to the trial, where it hasn't completed for
12 unforeseen circumstances, which I hope don't occur, then
13 I can't start the inquiry, but otherwise, I intend this
14 inquiry to start on that day, and of course the
15 necessary disclosure needs to have taken place before
16 that date so people can prepare themselves. So I'm sure
17 everyone has that in mind.

18 But I think at the moment all I can do is urge
19 people to talk together and try and come to some
20 conclusions as to what can be disclosed.

21 You say it's a very small part which hasn't been
22 disclosed. Mr Weatherby might think it's rather more
23 than you're saying it is. So communication, I think,
24 may be a good idea. You're all even here today.
25 Thank you very much.

1 MR PENNY: Thank you, sir.
 2 MS BARTON: Sir, may I assist on the communication point?
 3 SIR JOHN SAUNDERS: Of course, please.
 4 MS BARTON: Just to give some clarity, I hope, to it. As
 5 you may be aware, sir, GMP is providing family liaison
 6 support to families that wish to have it and also is
 7 providing briefings from the SIO about the progress of
 8 the criminal case.
 9 GMP has been providing information, to use your
 10 phrase, to adopt a phrase earlier, as far as possible in
 11 respect of the criminal trial, when able to do so. But
 12 of course, it is constrained to some extent.
 13 May I indicate that the most recent briefing about
 14 the criminal trial was provided to the family solicitors
 15 on 14 November and was followed up by an email to the
 16 families setting out what the process was going to be
 17 from there. The families will be invited, if they wish
 18 to attend, to a further briefing before the start of the
 19 criminal trial.
 20 And all of the family members have dedicated FLOs
 21 for the criminal trial and this inquiry.
 22 Sir, I stand to indicate to the families and those
 23 who represent them that GMP is reiterating the offer of
 24 support and will communicate whatever information they
 25 are able to communicate about the criminal trial as soon

53

1 as possible and that process is in place to do that.
 2 SIR JOHN SAUNDERS: I'm grateful for that.
 3 I am aware that from time to time -- and this is not
 4 attributing blame on either side -- the role of the
 5 family liaison officers and the lawyers representing the
 6 families sometimes have not always been smooth or not
 7 come into conflict. So it's very important that
 8 anything which is done is done in liaison with the
 9 lawyers for the families, as well as with the families
 10 themselves, to prevent any misunderstandings takes
 11 place.
 12 MS BARTON: Sir, indeed it is, and that's why the meeting
 13 took place on 14 November with the solicitors who wished
 14 to attend.
 15 SIR JOHN SAUNDERS: Thank you.
 16 Mr Weatherby, would you like to come back at all?
 17 MR WEATHERBY: I'm afraid I would. I wasn't going to raise
 18 this, but there have been difficulties. In fact,
 19 Mr Suter very much helped to smooth these out because
 20 the updates weren't being provided to the families'
 21 lawyers for reasons which we couldn't understand but,
 22 with Mr Suter's assistance, we understand that is now
 23 being ironed out.
 24 The updates that are being referred to -- if the
 25 updates were giving substantial information, then

54

1 I wouldn't have made my original submission. They are
 2 very sparse indeed.
 3 So whereas we very much welcome the fact of updates,
 4 it's becoming a problem, it has been a problem with some
 5 of the families in terms of them saying, "What is the
 6 case against Mr Abedi?" And indeed today, that's the
 7 first I've heard about the defence statement issue.
 8 Perhaps I could invite my learned friend to indicate
 9 when the defence statement should have been served.
 10 SIR JOHN SAUNDERS: I think I've been told today; is that
 11 right, Mr Penny?
 12 MR PENNY: It is due today. Obviously, it's a matter which
 13 is covered by the strict reporting order which is in
 14 place and will be, I assume, by the end of today's
 15 hearing, but the defence statement is due today.
 16 MR WEATHERBY: I will not be going anywhere at the end of
 17 this hearing and I will be here to communicate with --
 18 SIR JOHN SAUNDERS: Don't wait too long because you will
 19 know as well as I do that defence statements don't
 20 always come in bang on time.
 21 Before you sit down, Mr Weatherby, just so everybody
 22 understands, you and I will be familiar with the fact
 23 that what the prosecution intend to put before a jury,
 24 ie the used material, is not always what the defence
 25 agree can be put before the jury.

55

1 MR WEATHERBY: Yes.
 2 SIR JOHN SAUNDERS: Equally, with an opening, it's now
 3 become traditional to spend several days discussing what
 4 bits of the opening note will have to be excluded before
 5 the jury hear it and the judge will have to make
 6 a decision about that. So the mere fact that some of it
 7 is used material or is part of the opening note, that
 8 does not necessarily mean it becomes public, as you know
 9 as well as I do.
 10 MR WEATHERBY: I entirely agree and if this material came to
 11 us, if the opening came to us with sensible redactions
 12 at this point, we'd be perfectly happy with that. It's
 13 just the actual case against Mr Abedi, at a date when
 14 the trial should have started, is not known to the
 15 families.
 16 SIR JOHN SAUNDERS: Okay. Well, if some short explanation
 17 of the basis of the case could be given, I'm sure that
 18 would be a help.
 19 MR WEATHERBY: Yes, I'm obliged.
 20 SIR JOHN SAUNDERS: Thank you.
 21 MR GREANEY: Just to make a few short remarks about the
 22 points that have been developed before you.
 23 Mr Weatherby's submission about disclosure, namely
 24 that the families want to have as much of the
 25 prosecution materials as possible at this stage is still

56

1 a logical submission it seems to us. Nonetheless, it is
2 reasonable for the Crown Prosecution Service to point
3 out that at a stage at which they do not have full
4 information about how the issues will develop at that
5 trial, they must adopt a most careful approach to ensure
6 that they do not prejudice that trial.

7 But that said, we are certain that the Crown
8 Prosecution Service will have heard the very carefully
9 and moderately expressed desire of the families to have
10 material as soon as possible. The only thing we would
11 add is that everyone should understand -- and we are
12 certain they do, but we'll state it anyway -- that this
13 is not a question of whether the core participants will
14 receive the relevant prosecution materials, simply when
15 they will receive it.

16 So, sir, we're next going to move into a topic that
17 we described as "particular concerns". We have, that's
18 to say we as CTI, have two particular concerns, although
19 one has been moderated to some extent overnight by
20 a development that I'll set out in a moment.

21 Both of those concerns relate to GMP and whilst
22 everyone will understand, of course, that the police
23 must be working hard to prepare for the trial of
24 Hashem Abedi, unless those issues that I'm about to set
25 out are addressed immediately, the start date of 6 April

57

1 may be jeopardised.

2 The first concern relates to the corporate statement
3 and command and control statements of GMP. At a meeting
4 between the solicitor to the inquiry and GMP on 24 April
5 of this year, the solicitor made clear that it would be
6 necessary for witness statements addressing command and
7 control issues to be given by the relevant GMP officers,
8 so it follows that GMP has known for seven months that
9 such statements, such important statements, were
10 required.

11 On 5 August, the solicitor to the inquiry wrote
12 formally to the GMP, listing the topics that it
13 considered the command and control statements should
14 address and giving a date for service of the statements
15 of 13 September. Statements from 12 particular
16 individuals were sought.

17 May I pause for a moment to say 5 August was the
18 earliest date that the solicitor to the inquiry could
19 supply that note because it was not until 3 July that
20 GMP supplied details of those who held key control and
21 command positions at the relevant time. But in any
22 event, it follows that GMP has known of the requirement
23 for such statements for seven months and has known the
24 detail of what was required of it for nearly
25 four months.

58

1 Command and control statements have been requested
2 from a total of 12 organisations involved in the
3 emergency response and statements have been received
4 from each organisation save for GMP.

5 No statements had been received from GMP falling
6 into this category by 4 pm on 15 November, which was
7 a date, sir, that you set, by way of directions, as
8 a backstop date. However, an email from Ms Barton
9 Queen's Counsel was received by that time.

10 In that email, she acknowledged the delay for which
11 she, of course, bears no personal responsibility, but
12 nonetheless she acknowledged on behalf of GMP the delay
13 and she gave reasons for it.

14 Two chronologies were attached to that email. The
15 email and the chronologies were circulated to core
16 participants on 18 November.

17 Sir, from those chronologies it is clear to CTI that
18 work has been undertaken on this issue of statements
19 dealing with command and control issues, but it might
20 reasonably be suggested that the chronologies do reveal
21 gaps when more could have been done by GMP. So for
22 example, those documents do not address why work on the
23 command and control statements did not begin until
24 5 August when GMP was told three months earlier that
25 such statements were required.

59

1 Whilst we appreciate that the note of 5 August set
2 out a list of issues, it does seem to CTI that at least
3 some work could and should have been done before that
4 date.

5 Sir, when you gave your directions setting the date
6 of 15 November for service of the GMP statements, you
7 recognised the hard work that was ongoing to prepare the
8 statements and also the other work done by GMP to
9 support the inquiry.

10 We as CTI echo that and, moreover, we repeat that we
11 acknowledge that, alongside its work to support the
12 inquiry, GMP is having to prepare for the trial of
13 Hashem Abedi. However, the issue in relation to command
14 and control statements is now critical. Without them,
15 the emergency response experts cannot prepare their
16 reports.

17 Sir, as we observed in written submissions
18 yesterday, this current state of affairs undoubtedly
19 threatens the start date of 6 April.

20 Since we made that observation, there is some -- and
21 we underline the word "some" -- happier news. Late last
22 evening, six command and control statements were
23 received from Greater Manchester Police, although in the
24 time available we have not been able to consider them;
25 they are in draft at this stage.

60

1 I indicated that 12 statements had been requested,
 2 so we received half of those requested. Of the
 3 remaining six, as we understand from an email that
 4 accompanied the statements, two of those from whom
 5 statements had been requested by STI in fact had no
 6 command and control role on the night and a further
 7 witness is unwell and, of course, we will need to
 8 consider those explanations in due course.

9 But even operating on the basis that they are
 10 accurate, and we have no reason to believe that they are
 11 not, that still leaves three command and control
 12 statements that are outstanding. Again, we repeat, this
 13 issue is critical if we are to maintain the date of
 14 6 April.

15 Sir, the second concern that we have relates to what
 16 I'll describe as audio. The inquiry legal team sought
 17 from GMP recordings of all police radio communications
 18 for the night of the bombing. In response, GMP provided
 19 550 hours of audio from GMP radio transmissions from
 20 across the numerous divisions and areas and channels
 21 utilised by GMP to respond to and manage the incident.

22 The recordings had not been transcribed and, as
 23 a result, it was necessary for STI to undertake that
 24 work. As STI indicated in its update on the
 25 investigation into the emergency response on 2 May of

1 this year, you, sir, had directed that all transmissions
 2 between 2215 hours on 22 May and 0045 hours on 23 May
 3 should be transcribed, although that was later extended
 4 to 1 am on 23 May and in some cases to 3 am.

5 There's no doubt that the work of transcribing those
 6 transmissions has been a very substantial task for your
 7 team.

8 Recently, concerns have been raised by the inquiry's
 9 policing experts, and indeed by one of GMP's own
 10 officers, about whether there may be gaps in the
 11 recordings provided to the inquiry. If that is so,
 12 it is of the utmost significance. The radio
 13 transmissions are of central importance to the inquiry
 14 and, as is perfectly obvious, they will inform the views
 15 of the inquiry experts on command and control issues.
 16 So their importance and the importance of having
 17 accurate transcripts cannot be understated.

18 If the radio transmissions that have been
 19 transcribed to date are incomplete, that will need to be
 20 addressed as a matter of urgency if the oral evidence
 21 hearings are to start, as you, sir, are determined they
 22 will, on 6 April.

23 We acknowledge that GMP has, since this issue arose,
 24 been investigating what the true position is. But the
 25 time, we suggest, has now come for certainty. We

1 submit, sir, that at this hearing GMP must explain,
 2 through counsel, whether there is a problem in this
 3 regard and, if there is, its scale.

4 So it seems to us that, having made our remarks, the
 5 sensible way for submissions to develop is first
 6 Mr Weatherby, on behalf of the bereaved families, any
 7 other core participants who have a submission to make on
 8 this topic, and finally an update from Ms Barton on
 9 behalf of Greater Manchester Police.

10 SIR JOHN SAUNDERS: Thank you. Mr Weatherby.

11 MR WEATHERBY: I'm sorry to be complaining again, but I'm
 12 afraid I am going to be here. Our clients, the families
 13 in general, desperately want to have confidence in the
 14 Greater Manchester Police because of the central role
 15 that they played in the events that we're considering
 16 here, but also the central role they play in the
 17 criminal aspect and also in assisting this inquiry. So
 18 I preface my complaints by saying that's the positive
 19 aspect of what the families want: they want to have
 20 confidence.

21 But the sorry tale that Mr Greaney indicates is,
 22 frankly, not good enough. I'm not going to repeat it,
 23 but I do want to add something to it.

24 By 5 August, when GMP had been on notice as to much
 25 of the information that was being requested of them --

1 and 5 August was when it was particularised to them --
 2 that was at a time where, three weeks earlier a report
 3 had been published, a publicly available report, the
 4 Grainger inquiry, which contained the strongest
 5 criticisms of Greater Manchester Police that I think
 6 there have ever been.

7 In that inquiry report, the judge found, in the
 8 strongest terms, a lack of candour and serious
 9 disclosure failures. He found that several senior
 10 Greater Manchester Police officers had misled the
 11 inquiry, his word, and they misled, his word again,
 12 a criminal case associated to that.

13 In that context, three weeks later, when GMP are
 14 turning to deal with the matters that Mr Greaney has
 15 adverted to, one might have thought that the
 16 Chief Constable would have sent down the line the
 17 clearest of instructions that the response in respect to
 18 this Manchester bombing outrage had to be done to the
 19 highest possible level.

20 The complaints I make here are not directed at
 21 Ms Barton, she has come into this case very late, but
 22 Greater Manchester Police really have to answer here as
 23 to why it has dragged its feet and taken so long with
 24 these command and control statements, to the extent
 25 where counsel to the inquiry is saying that there is

1 potential jeopardy to the date.
 2 There is also, of course, the audio point. I'm not
 3 going to repeat the points made. But these were
 4 required, I think, by 13 September, more than two months
 5 ago.

6 SIR JOHN SAUNDERS: Thank you. The stenographers wish to
 7 have a break. Do any of the other parties wish to say
 8 anything before Ms Barton responds? Ms Barton, before
 9 you do -- and I'll give you the break to think about
 10 what's going to be said -- clearly getting things done
 11 in time and done properly is absolutely essential.

12 There is no material before me from which I can
 13 infer bad faith on behalf of the police, nor would
 14 I wish to do so. It may not be -- I certainly don't
 15 want you to refer back the Grainger inquiry as a result
 16 of that. But what I am absolutely insistent on is that
 17 this inquiry has to start on 6 April. It is simply not
 18 fair to the families to have to wait any longer than
 19 that or to anyone else or to Manchester in general to
 20 know.

21 If there is a delay and it is down to the Greater
 22 Manchester Police that there is a delay, I have no doubt
 23 that there will be extremely extensive public criticism
 24 made of the Greater Manchester Police, which will not be
 25 in their interests, I'm sure.

1 We'll now have a 10-minute break and then we'll come
 2 back and hear your response.

3 MS BARTON: Sir, may I say I will give a full response when
 4 I'm given an opportunity.

5 SIR JOHN SAUNDERS: Thank you.
 6 (11.57 am)

7 (A short break)
 8 (12.10 pm)

9 SIR JOHN SAUNDERS: Ms Barton.

10 MS BARTON: Sir, thank you. If I may deal with the issue of
 11 the command and control statements first.

12 SIR JOHN SAUNDERS: Thank you.

13 MS BARTON: May I say this, sir, that it is, in my
 14 submission, very regrettable that Mr Weatherby has
 15 sought to bring the issue of candour into this argument,
 16 because this argument is about delay, not about candour.
 17 There isn't any question at all, nor is there any
 18 suggestion, of a lack of candour on the part of GMP
 19 in relation to the preparation for this case. Therefore
 20 it is perhaps unfortunate that we start the submissions
 21 about the command and control statements on a completely
 22 false basis. So I utterly refute any suggestion of
 23 a lack of candour on behalf of the team or the witnesses
 24 that are dealing with this issue.

25 Turning to the specifics of the delay in the command

1 and control statements -- and I accept readily there has
 2 been a delay. Sir, part of that does arise from the
 3 fact that we had to change counsel during the period
 4 when the statements were being prepared because that
 5 necessarily meant I had to read in, so there is some
 6 delay there.

7 The reality is that although we were aware in April
 8 that statements would be required, the first part of the
 9 process is to identify those from whom statements are
 10 most likely to be required because they're in particular
 11 roles. So it's not a case of GMP sitting on their hands
 12 between April and August. During that period, bearing
 13 in mind that GMP had more personnel on the scene than
 14 anybody else, hundreds of officers and staff were
 15 involved in this incident, the first step was to
 16 identify the key individuals. That was done and in July
 17 a list of key individuals was provided to your team.

18 In August, the letter was written. That identified
 19 the individuals which you, sir, wanted statements from.
 20 What is perhaps important in terms of the understanding
 21 of these proceedings, which are not adversarial but
 22 inquisitorial, is that you as the chair decide -- and
 23 sitting before as a coroner, in exactly the same way --
 24 which witnesses you would like called. It is not for
 25 GMP to produce the list of witnesses as we might in

1 other case. So we make the suggestions and your team
 2 chose very quickly who they might like to hear evidence
 3 from.

4 The initial list was in respect of 12 individuals.
 5 Two of those individuals were senior officers who had no
 6 command and control role and there was a series of
 7 emails between Mr Suter and those who instruct me, and
 8 those two individuals have not been pursued in terms of
 9 statements.

10 So we then have an overarching statement, which
 11 I call the part 1 statement, arising from the letter of
 12 5 August, and that's the overview, the structure of GMP,
 13 the policies and guidance, and other strategic and
 14 overarching matters.

15 The drafting of that statement has proved to be an
 16 enormous task. I can say that at the moment -- I have
 17 provided a chronology.

18 The final meeting with the deputy Chief Constable
 19 in relation to that draft is 29 November. That is
 20 scheduled and in the diary. Any amendments or additions
 21 that need to be made to that statement following that
 22 meeting will be finalised by 6 December. So I can say
 23 that the end date for provision of that statement is
 24 6 December.

25 The part 2 matters concerned initially

1 12 statements, and as I say now, ten. Of those, six
2 were provided yesterday. One officer is on long-term
3 sick leave and we will have to liaise with your team
4 about either finding another witness or provision of
5 a medical report and working out whether and when that
6 witness might be able to provide a statement. That's an
7 ongoing process.

8 Two officers are in possession of final drafts, so
9 that leaves us with three officers who we need
10 statements from. Two officers are already in possession
11 of final drafts and one officer is being provided with
12 a final draft today.

13 So this is not a piece of work that GMP have sat on
14 at all. It has been a huge undertaking for GMP,
15 involving an enormous amount of material.

16 May I indicate one specific problem which -- I set
17 out, I think, four specific difficulties in my email
18 which GMP had encountered in drafting these statements.
19 One of those was that it became obvious that further
20 transcripts would be needed. For very good reason, your
21 team had undertaken to transcribe the 550 hours of audio
22 that had been obtained. On 15 October, the final
23 transcripts were available and uploaded. Those have
24 been used in the drafts that have been presented.

25 So, sir, with the best will in the world, there was

1 some information which, despite everybody's best
2 efforts, was still missing. So we are now in
3 a position, sir, where the part 1 response will be ready
4 by 6 December, and the final three officers are in
5 possession of drafts of their statements. Where we have
6 given drafts to officers, we have asked them to return
7 them as quickly as possible, and you will see by the
8 response, as we were able to give you six yesterday,
9 they have returned them swiftly.

10 May I now turn to the families and apologise
11 profusely for the delay it's no fault of the officers
12 who were giving the statements, sir, that these delays
13 have occurred; it's the sheer volume of the task.

14 May I reiterate, sir, GMP's commitment -- the same
15 as all in this room -- to the start date. We would not
16 want to do anything to prejudice the start date. There
17 are, fortunately, still four months before the start of
18 this hearing and the statements now are all in draft,
19 save for the part 1, which will be finished by
20 6 December.

21 SIR JOHN SAUNDERS: Thank you. Just on the question of
22 statements, my team has not had an opportunity to
23 consider them yet or whether they cover the points which
24 the team are particularly interested in.

25 MS BARTON: Yes.

1 SIR JOHN SAUNDERS: It may well be that there will be
2 comeback from the team, saying, "We would like you to
3 give more detail about this, that or the other". Can we
4 please ensure that is dealt with promptly as well?
5 I accept everyone has now moved very quickly, or seems
6 to have done, to try and catch up, as it were, and
7 I accept that your late instruction inevitably may have
8 led to some delay. I find it difficult to understand
9 why it would lead to much delay because you would only
10 be involved at the final stage, I suspect, of looking at
11 any draft, but I hope that you will ensure that things
12 are done extremely promptly and it doesn't drift from
13 now on and require another hearing to come back and say,
14 "Let's get on with it". I will take your assurance that
15 that's right.

16 Can I also say in relation to what has been raised
17 about lack of candour: no comment about lack of candour
18 can be made until we actually see what's in the
19 statements; then we will consider whether they're candid
20 or not. That's not a matter really for today.

21 MS BARTON: Sir, may I address one point arising out of
22 that? One of the reasons why it has taken some time to
23 produce these statements is we very much hope we have
24 answered very comprehensively every question that has
25 been asked with reference to the underlying material.

1 So in drafting the comprehensive statements we were
2 trying to make sure that there would be one draft that
3 would be acceptable to your team. Of course, we can't
4 guarantee that, but we absolutely -- GMP has done its
5 best.

6 Can I now turn to the second issue, which is the
7 missing audio, if I can put it like that. May I give
8 some context and background to that? The GMP
9 communications server was undergoing an update between
10 June 2016 and August 2017. This involved technicians
11 working on the new server while GMP continued to store
12 content and communications on the old system.

13 The Manchester Arena attack occurred within this
14 period, so despite the expectation that all the
15 communications in respect of the attack would be on the
16 old server, in fact GMP did do checks on the new server
17 at an early stage for communications after 2330 on
18 22 May 2017. At the time those checks were made,
19 nothing was found on that server.

20 Sir, as has already been indicated, over 550 hours
21 of audio recordings were provided to your team by GMP
22 early this year. Following discussions between your
23 inquiry team and GMP, the inquiry team undertook the
24 transcription process.

25 On 15 November of this year, GMP became aware of

1 a potential gap in the audio provided, and that was as
 2 a result of a witness who was being proofed as part of
 3 the command and control. Immediately, on that same day,
 4 GMP drew that matter to the attention of your team and
 5 we now understand, although we weren't aware of it
 6 at the time, that one of the experts had also expressed
 7 a concern. I don't know when that was.

8 Prior to this, however, we had had no idea that
 9 there was this problem because the server had been
 10 checked and it had not been found. The exercise that
 11 was started on 15 November was to search the new system
 12 to ensure that all audio has in fact been recovered.

13 Sir, until that exercise is complete, GMP is not
 14 able to identify the scale of the problem. But -- and
 15 I stress that this is a belief at this stage -- GMP
 16 believe that it is limited to one radio channel,
 17 channel 75, for a limited period.

18 The search which is currently being conducted and
 19 has been ongoing since 15 November will be completed by
 20 2 December.

21 Meanwhile, on 15 November, in addition to the
 22 process which is being carried out by GMP, and in order
 23 to apply an assurance process over the top, a request
 24 has been made via British Telecom to NICE -- NICE are
 25 the systems provider who manage the data held on the

1 server by GMP, and they are going to carry out an
 2 assurance process and provide three engineers for that
 3 purpose.

4 So, sir, we have a dual-stranded approach to it.
 5 The preliminary advice from GMP as to what, if anything,
 6 is missing -- and we know something is on channel 75 --
 7 will be provided by 2 December. We believe that will be
 8 an accurate assessment. But meanwhile, overlaying that
 9 will be an exercise by three engineers in order to
 10 ascertain whether we have in fact found everything which
 11 is stored on that server, which is relevant.

12 SIR JOHN SAUNDERS: Right. We are still dependent on how
 13 much material there may be?

14 MS BARTON: We are.

15 SIR JOHN SAUNDERS: The transcription process is, I imagine,
 16 a relatively lengthy one. At the moment, we've been
 17 carrying it out. It may be that we'll have to ask for
 18 the assistance of GMP to make that quicker and do it.
 19 But it's vital, as I understand it, for the experts to
 20 be able to give their views, to have all the
 21 communications which are going on.

22 MS BARTON: Yes.

23 SIR JOHN SAUNDERS: So again, it is absolutely vital this
 24 timetable is carried out. Then there will have to be
 25 discussions between my team and GMP as to how much there

1 is and how much needs to be transcribed and whether both
 2 teams need to be working on the transcription as well in
 3 order to make it happen. I think we're going to need
 4 some flexibility about this.

5 MS BARTON: Sir, absolutely. We understand the urgency.
 6 Can I give some indication for the belief that it is
 7 quite limited? I do this with a caveat. Where one
 8 inspects the various transcripts, there aren't obvious
 9 gaps in the way that, if one analyses the channel 75
 10 transcript, there is. If one takes that as a starting
 11 point and compares it against what we've done so far,
 12 it would appear that the existing transcripts do give
 13 some accurate indication of where the gaps might lie.

14 It doesn't look at the moment, with my caveat, that
 15 it is going to be a huge amount of material. But if
 16 it is, we entirely accept that there will have to be
 17 both urgency and flexibility on the part of GMP, and
 18 indeed your team, to deliver that material as soon as we
 19 possibly can.

20 SIR JOHN SAUNDERS: Okay, thank you.

21 Does anybody want to come back on that?

22 Mr Weatherby, do you want to say anything in response?

23 MR WEATHERBY: No, I simply invite you to set directions
 24 with very short dates on them.

25 SIR JOHN SAUNDERS: I'm told 2 December is the date that

1 we're aiming for, so we'll expect to have the response
 2 and the material by 2 December, please, and direct that.
 3 Then the assurance can be done by when, to make sure
 4 we've got it all?

5 MS BARTON: Sir, we don't have a date for the assurance
 6 because they're not yet in a position to give us it, but
 7 we are constantly chasing for when the end of their
 8 process will be.

9 SIR JOHN SAUNDERS: Right. Well, I think we need to have
 10 the assurance by certainly the end of December.

11 MS BARTON: Yes, I understand.

12 SIR JOHN SAUNDERS: So I will make those directions.
 13 Thank you.

14 Mr Greaney.

15 MR GREANEY: Sir, I'll simply add that we must hope that the
 16 caveated belief eventuates. We're certain that GMP will
 17 have heard what you had to say about the likely
 18 consequences for them as an organisation if the start
 19 date is disrupted.

20 I'll now move on to the final topic, subject to any
 21 other business, which is position statements.

22 SIR JOHN SAUNDERS: Can I just say this about the position
 23 statements. We've all read the helpful submissions of
 24 Mr Weatherby and I'm sure the other parties here have as
 25 well. It raises potentially quite difficult issues.

1 There are certainly positives from adopting that system
2 in clarifying the issues and therefore maybe
3 short-circuiting some of the matters which need to be
4 gone into.

5 Equally, I think it's probably accepted all round
6 that it's too early to make that sort of order at the
7 moment because we haven't had all the material. I am
8 perfectly happy for you to explore it to an extent, for
9 Mr Weatherby to make the submissions that he has made in
10 writing, and then put off any responses to another
11 hearing.

12 Alternatively, we can put the whole matter off. I'm
13 in everybody's hands about that. I'm perfectly happy
14 either way, but I'm not at the moment going to ask for
15 a response from other people about position statements
16 until they've had more time to think about it because
17 it's actually a difficult issue, I think.

18 MR GREANEY: Sir, shall I set out our brief submissions on
19 the topic?

20 SIR JOHN SAUNDERS: Yes, do.

21 MR GREANEY: It'll take no more than a few minutes and then
22 Mr Weatherby can indicate whether he is content, if
23 I might put it this way, park the issue for the time
24 being or whether he wants to develop any particular
25 arguments at the moment.

77

1 SIR JOHN SAUNDERS: I'm perfectly happy to hear submissions
2 about it now, I make that absolutely clear, and it may
3 be helpful for everyone to have some understanding of
4 what's involved.

5 MR GREANEY: That's my thought process. It would be helpful
6 for the public to understand what we're talking about.
7 As I say, it will take no more than a few minutes.

8 Sir, as you've indicated, in their written
9 submissions Mr Weatherby and his team have argued that
10 position statements should be served on behalf of each
11 public authority and core participant setting out
12 effectively what is in issue and what is not in issue.

13 Sir, so that everyone knows, having received those
14 submissions, you made the following direction this
15 Wednesday. You directed:

16 "In the submissions received on behalf of the
17 families represented by Broudie Jackson Canter and
18 Hudgells, a request was made for the chairman to direct
19 organisations to provide position statements.

20 "At the hearing on Friday, the chairman proposes to
21 invite oral submissions on this issue from
22 Pete Weatherby Queen's Counsel and counsel to the
23 inquiry only."

24 So sir, the point you just made:

25 "Other core participants may make oral submissions

78

1 if they wish, but the chairman does not anticipate
2 making a ruling on this issue at the hearing on Friday.
3 It is anticipated that the chairman may make directions
4 with a timetable for any further submissions to be
5 lodged by other core participants."

6 Sir, the position of CTI, which it's apparent it is
7 a position you share, is this an important issue for you
8 to decide. But many of us in this room have dealt with
9 this issue before, and indeed I have dealt with it with
10 Mr Weatherby before, and there is no doubt that there
11 are compelling arguments on both sides, which
12 ultimately, sir, you will need to balance and decide.
13 But our position today is that it's premature for this
14 issue to be argued, let alone ruled upon by you.

15 In particular, disclosure, including disclosure of
16 command and control statements and corporate statements
17 and expert evidence is far from complete. It seems to
18 us that the real value of position statements will only
19 become apparent once all of that material is available
20 to the core participants and, in any event, our
21 judgement is that it would not be reasonable to expect
22 core participants to submit position statements until
23 they have seen that material.

24 So in those circumstances, sir, we submit that it
25 may be appropriate to give directions for the submission

79

1 by core participants in writing on this issue, but to
2 resolve the issue at some later hearing, probably at or
3 shortly before the start date of 6 April. That is our
4 position in short.

5 SIR JOHN SAUNDERS: Thank you.

6 Mr Weatherby, I think it would be helpful to hear
7 from you in general terms why you think it's a good
8 idea.

9 MR WEATHERBY: Thank you very much. I'll do that as shortly
10 as I possibly can.

11 SIR JOHN SAUNDERS: You have as long as you need.

12 MR WEATHERBY: Thank you. Can I make two assurances at the
13 outset. First of all, this proposition, this
14 submission, follows earlier submissions that I made that
15 the families' only interest is to get the other core
16 participants to cooperate fully with the inquiry.
17 That is informed by what has been repeatedly referred to
18 in inquiry reports and elsewhere as a problem with
19 candour.

20 There are headline cases where there have been
21 problems with candour which are well-known, but there
22 are less well-known ones where there are reports that
23 refer to it, the Francis report in terms of the North
24 Staffs NHS issues and the Morecambe Bay NHS report, the
25 Bishop James report, the Harris report, various others.

80

1 There is a problem with candour, particularly , not
 2 exclusively , but particularly related to the way that
 3 public authorities react to major controversial events.
 4 Therefore the notion of position statements and
 5 codifying a duty of candour has become a big talking
 6 point to the extent that a bill has been put before
 7 Parliament, in fact by Mr Warnock's client, now the
 8 Mayor of Manchester, when he was in Parliament, but it
 9 was a bill that had cross-party support and it's a bill
 10 which is in fact in one of the manifestos for this
 11 election . So it's something which is a very live issue
 12 generally .
 13 It is also a matter that has been taken up within
 14 inquiries and inquests and where some public authorities
 15 have voluntarily put forward position statements before
 16 anyone has even raised it because of the utility to
 17 them. In those cases, my understanding is that it's
 18 quite often related to the belief of those public
 19 authorities that everybody's best interests are served
 20 by them asserting their position as early as is possible
 21 within the process, but also to shorten the proceedings.
 22 That obviously has a big impact on the families and the
 23 bereaved in the context of inquests and inquiries into
 24 controversial deaths, but also in terms of public
 25 funding and reducing the amount that is expended on what

1 are expensive inquiries .
 2 Position statements act, where they are utilised ,
 3 even voluntarily by public authorities or at the request
 4 of chairs , to improve the candour and the disclosure of
 5 relevant facts , sometimes failings , sometimes facts
 6 which allay rumours and the like .
 7 So what we're actually talking about here is
 8 a request from the inquiry that all of the public
 9 authorities and the corporates involved in the issues
 10 here should make a statement by their chief officer or
 11 chief executive , with a statement of truth , which sets
 12 out the things that are in paragraph 19 of our written
 13 submissions, so thereby a narrative of what their
 14 institutional company and its officials or employees did
 15 or did not do with respect to each of the terms of
 16 reference that is relevant to them.
 17 So it sets out their institutional position of what
 18 they did -- not what other people did in general terms,
 19 but what they did . Of course, they have the knowledge
 20 of what they did or did not do .
 21 Secondly, an overlap from that, so far as is
 22 relevant to their own performance and their own duties,
 23 adding to that narrative what other core participants
 24 do, but only to that extent .
 25 Importantly, a position statement ought to set out

1 any failures in their own performance that there may
 2 have been or to indicate where there haven't been
 3 failures but where failures have been adverted to by
 4 others .
 5 Also, a position statement should set out what
 6 policy or operational changes have occurred since the
 7 incident, because that is often a guide to where to look
 8 for what did or didn't happen or should or shouldn't
 9 have happened .
 10 Finally , the position statement allows for any other
 11 relevant matters .
 12 The utility of that is perhaps obvious, but it first
 13 of all assists the inquiry by honing and focusing the
 14 true issues and making it less necessary for the inquiry
 15 to go down roads which are clearly indicated by the
 16 position statements not to be truly of interest .
 17 Secondly, it has the effect of concentrating the
 18 institutional mind, not on looking at how it can defend
 19 its position , which is often the identified problem, but
 20 looking outward to see how it can look to the inquiry to
 21 get the truth out, to establish accountability , and also
 22 to establish changes for the future , to prevent anything
 23 happening again .
 24 The third point, I've already made it, is the
 25 advantage is in focusing the process, it shortens the

1 investigation .
 2 The issue that perhaps I would like to take further,
 3 but not today, is when. The submission I would make
 4 is that position statements are narratives of what the
 5 institution itself knows and therefore the disclosure,
 6 the wider disclosure, is not necessary for the position
 7 statements. So as early as possible, the position
 8 statement should be provided to the inquiry because it
 9 can then direct other matters, but I accept that part of
 10 my submission has some controversy .
 11 May I make a submission that, taking on board what
 12 Mr Greaney has said, I expand my written submissions on
 13 this one point and then other CPs, if they want to,
 14 respond to them and then they come back to the next
 15 hearing? I understand the next hearing is likely to be
 16 in January .
 17 SIR JOHN SAUNDERS: Yes .
 18 MR WEATHERBY: It may be that it could be dealt with then .
 19 SIR JOHN SAUNDERS: Can you just help me on one point? You
 20 linked position statements with a duty of candour .
 21 MR WEATHERBY: Yes .
 22 SIR JOHN SAUNDERS: Presumably, the duty of candour will
 23 arise irrespective of whether we have position
 24 statements .
 25 MR WEATHERBY: That's a difficult point . It has been argued

1 that the common law duty of candour applies here and
2 therefore compels public authorities to act with
3 candour, and I would certainly argue that is right.

4 But it would be right to say that the development of
5 the legal duty of candour has generally been in much
6 more narrow circumstances, particularly judicial review.

7 The persistent experience which gives rise to the
8 discussion about duty of candour has led to the calls
9 for statutory change to codify it. That hasn't gone
10 through, but I advert to that as a matter of context.
11 But in the absence of the statutory changes, there are
12 requests that can be made and generally, although it's
13 early days for position statements, one would hope that
14 public authorities would respond to a request from the
15 chair of an inquiry to set out a position statement
16 in the terms that I've set out or those which the
17 inquiry would determine itself.

18 SIR JOHN SAUNDERS: Thank you.

19 Does anybody wish to respond instantly and give any
20 indication whether this is likely to be contentious or
21 whether it's going to be relatively uncontentious, or
22 would you prefer to give yourselves time to think about
23 it and respond in writing?

24 MR GIBBS: I'm content to say that it's likely to be
25 contentious. Every lawyer in the room will know that

85

1 this is a favourite submission of a few and that there's
2 a lot to be said on the subject on both sides.

3 SIR JOHN SAUNDERS: Okay. Thank you very much.

4 Is it appropriate for us to consider it at the next
5 hearing, at least hear arguments on the matter?

6 MR GREANEY: I was going to propose a timetable.

7 SIR JOHN SAUNDERS: Fine, thank you very much. Do that.

8 MR GREANEY: I'll set out the timetable first of all and
9 then make an observation about it.

10 What I was going to suggest is that, yes, this issue
11 can be discussed further at the next hearing, which is
12 scheduled for 28 January. That timetable would be for
13 Mr Weatherby to serve his further submissions by
14 13 December.

15 SIR JOHN SAUNDERS: If he feels it necessary to do any more.

16 MR GREANEY: From what he's said, I understand he would.

17 (Pause)

18 Let's say 13 December, although Mr Weatherby thinks
19 he can do better than that.

20 13 December at the very latest for Mr Weatherby's
21 submissions. Any submissions of other core participants
22 by 10 January. CTI's submissions by 27 January.

23 Can I make plain that by 10 January and by
24 27 January, assuming everything goes to plan, we will
25 have provided the disclosure that the core participants

86

1 will require to argue the point. But the inquiry's
2 expert evidence will not have been served or is most
3 unlikely to have been served by that date, particularly
4 bearing in mind what we've been told by GMP to date. So
5 that is a fact to bear in mind because we anticipate
6 that some core participants will say that even if
7 position statements as a matter of principle are
8 appropriate, as a matter of practicality they should not
9 be served until after the expert evidence has been
10 provided.

11 SIR JOHN SAUNDERS: If I do make a ruling on this, ordering
12 there should be position statements, it would apply to
13 those matters which are going to be in closed as well --

14 MR GREANEY: Yes.

15 SIR JOHN SAUNDERS: -- and so we need argument on that as
16 well, please. The argument may need to be in closed
17 in relation to that, depending on how necessary it is to
18 go into the details of any of those matters. But it may
19 be possible just to do it in open.

20 MR GREANEY: Of course.

21 May I say it was very good of Mr Gibbs to indicate,
22 as far as his client is concerned, this is likely to be
23 controversial. I can say from discussions with other
24 advocates that it will not only be his client who is
25 likely to be opposing this course and also experience

87

1 indicates that many others will oppose the provision of
2 position statements. But as Mr Gibbs has said, there
3 are undoubtedly detailed arguments on both sides.

4 SIR JOHN SAUNDERS: Thank you.

5 MR GREANEY: May I also say in relation to the hearing of
6 28 January, that is a hearing which will take place
7 during the course of the criminal trial itself, which is
8 less than ideal, but we are probably left with no
9 choice, given that there are matters of administration
10 such as this that we will have to deal with.

11 SIR JOHN SAUNDERS: Right. We can deal with anything like
12 that through reporting restrictions.

13 MR GREANEY: Quite.

14 SIR JOHN SAUNDERS: Does anybody want to object to the
15 timetable which has been proposed, or can you all manage
16 that? You're going to get it before the due date from
17 Mr Weatherby, so that's going to give you even longer to
18 think about it for your response.

19 Any other business?

20 MR GREANEY: Not so far as counsel to the inquiry are
21 concerned. I don't know if anyone else has any issue
22 they wish to raise. No one is indicating that they do.

23 Sir, on that basis, unless there's anything in
24 particular you would like us to address, we have reached
25 the point at which we ought to have a short break to

88

1 consider the issue of reporting.
 2 SIR JOHN SAUNDERS: Can I say, because I will forget when
 3 I come back, when we have dealt with that matter, could
 4 people allow the families to leave first, just to remain
 5 for a few minutes so the families can get out of the
 6 building before everybody else goes as well?
 7 MR GREANEY: Sir, I'm sure everyone will respect that.
 8 SIR JOHN SAUNDERS: I'm grateful for everyone's submissions
 9 and the expedition with which people have dealt with it.
 10 I have never seen so many silent lawyers in one room in
 11 my life, I think. Thank you for that.
 12 MR GREANEY: Sir, if no one is going to suggest that
 13 submissions should be made on reporting, do you need to
 14 come back into the hearing?
 15 SIR JOHN SAUNDERS: I think there are bound to be some.
 16 I'll come back.
 17 (12.45 pm)
 18 (A short break)
 19 (12.55 pm)
 20 MR GREANEY: Sir, as you anticipated, there are some
 21 matters.
 22 The correct power for you to exercise to ensure
 23 reporting restrictions is your power under section 19 of
 24 the Inquiries Act 2005, so what we invite you to order
 25 is that there should be a restriction order pursuant to

89

1 that provision --
 2 SIR JOHN SAUNDERS: Can all the press hear what's being
 3 said? Thank you.
 4 MR GREANEY: I'm going to ask you to rise again, sir -- I'm
 5 sorry about this -- just for a few moment, just so I can
 6 reflect on something that I have been told. Thank you.
 7 SIR JOHN SAUNDERS: Just so we're aware of it, the press are
 8 bound in any event by the orders which have already been
 9 made by Mr Justice Baker and it is for them to make sure
 10 that they comply with them. But it would obviously help
 11 the press, I assume, to know exactly what in our
 12 understanding they should not report from today with the
 13 help of prosecuting counsel.
 14 MR GREANEY: Well, sir, I believe that is precisely the
 15 position that we'll reach. I just want to ensure that
 16 we've dealt with this properly.
 17 SIR JOHN SAUNDERS: I'll rise.
 18 (12.56 pm)
 19 (A short break)
 20 (1.00 pm)
 21 MR GREANEY: It is tempting to get Mr de la Poer to deal
 22 with this in case it goes wrong again, but I believe we
 23 are all now clear about the power that exists and the
 24 position as it exists.
 25 As I indicated at the outset of the hearing today,

90

1 an order has been made pursuant to section 4.2 of the
 2 Contempt of Court Act prohibiting the reporting of any
 3 aspect of the proceedings against Hashem Abedi, save for
 4 certain identified matters, which I did set out at the
 5 outset of the hearing today.
 6 The view of all that I have consulted in respect of
 7 this issue is that that order will operate to prevent
 8 the reporting of a number of specific issues, so the
 9 press need to have regard to the generality of the
 10 order, but these are specific issues.
 11 First of all, there should be no reporting of the
 12 fact that ultimately it is anticipated that the terms of
 13 reference of this inquiry will also cover whether there
 14 should have been Prevent referrals in respect of members
 15 of Salman Abedi's family.
 16 It is also our view that the reporting restriction
 17 operates to prevent any reporting of what was said by
 18 Mr Penny about whether there has or has not been
 19 a defence statement lodged by Hashem Abedi.
 20 Subject to that, it is for the press to decide what
 21 they can and cannot report, having regard to the very
 22 clear terms of the order made in the criminal
 23 proceedings. That is the position.
 24 SIR JOHN SAUNDERS: Anybody else want to say anything?
 25 First of all, does the press want to say anything?

91

1 Do you have any queries? If you have them, we'll try
 2 and answer them or do you have any submissions to make?
 3 I'm not actually making an order, this is just us
 4 interpreting the order and how it applies to today's
 5 hearing as made in the Crown Court. But it really
 6 just -- anything -- yes?
 7 MEMBER OF THE PRESS: I think we don't entirely follow the
 8 need for restrictions on the Abedi family, which is
 9 quite a large group, but we accept that that has already
 10 been made, and having discussed it with Mr Greaney and
 11 Mr Penny, we completely understand the request that has
 12 been made.
 13 SIR JOHN SAUNDERS: That's very kind of you, thank you very
 14 much. That's very helpful.
 15 Then I think I will now rise and bring this hearing
 16 to a halt and we will see each other on 28 January.
 17 (1.03 pm)
 18 (The inquiry adjourned until 28 January 2020
 19 at a time to be determined)

92

1 INDEX
2
3 Pre-inquiry review1
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

93

94

A

abedi (37) 1:16,17,19
2:2,11,24 3:4,15 4:12
5:1 7:24 16:2 17:7,19
23:10,25 24:11,12,12
26:13 38:8 39:24
40:6,11 44:13
45:19,24 46:6 48:2
51:13 55:6 56:13
57:24 60:13 91:3,19
92:8

abedis (2) 3:23 91:15

ability (1) 32:21

able (19) 13:7 14:4
17:14 20:7 21:13 24:6
25:13,22,25 30:25
31:12 48:10 53:11,25
60:24 69:6 70:8 73:14
74:20

above (1) 51:3

absence (1) 85:11

absent (1) 36:16

absolutely (10) 25:9
32:15 35:20 45:13
65:11,16 72:4 74:23
75:5 78:2

abundantly (1) 16:9

accept (7) 48:8 67:1
71:5,7 75:16 84:9 92:9

acceptable (1) 72:3

accepted (2) 28:6 77:5

access (3) 34:20 37:20
41:5

accompanied (1) 61:4

according (1) 46:12

accordingly (2) 4:12
25:3

account (3) 16:11 18:12
48:18

accountability (1) 83:21

accurate (4) 61:10
62:17 74:8 75:13

accused (3) 2:17,19 3:1

achieve (2) 14:12 38:4

achieved (2) 38:5,9

acknowledge (5) 13:12
22:21 43:8 60:11
62:23

acknowledged (2)
59:10,12

across (1) 61:20

actual (1) 56:13

actually (10) 20:24 27:2
44:1 46:21,22 48:10
71:18 77:17 82:7 92:3

adam (2) 9:23 10:10

add (9) 6:5,8 21:15
27:4 39:20 47:18
57:11 63:23 76:15

adding (1) 82:23

addition (2) 26:3 73:21

additional (2) 34:16
41:18

additions (1) 68:20

addleshaw (1) 9:19

address (8) 2:16
5:12,22 26:2 58:14
59:22 71:21 88:24

addressed (2) 57:25
62:20

addressing (2) 11:25
58:6

adduced (2) 44:10 51:1

adequate (1) 11:24

adjourned (3) 2:22,23
92:18

adjut (1) 35:21

administration (2) 4:25
88:9

administrative (2)
36:13,20

admissibility (2) 47:2
50:4

adopt (2) 53:10 57:5

adopted (2) 25:8 43:18

adopting (2) 31:8 77:1

advance (5) 33:2 45:12
46:20 49:14 50:24

advanced (2) 45:11,23

advantage (1) 83:25

adversarial (1) 67:21

advert (1) 85:10

adverted (2) 64:15 83:3

advice (1) 74:5

advocates (1) 87:24

affairs (1) 60:18

affect (1) 51:13

afraid (3) 17:15 54:17
63:12

after (5) 26:6 43:7 46:2
72:17 87:9

again (12) 21:4,5 28:21
31:22 46:19 61:12
63:11 64:11 74:23
83:23 90:4,22

against (11) 1:19 2:1,11
3:15 4:12 5:1 46:5
55:6 56:13 75:11 91:3

age (1) 2:16

agenda (6) 6:24 7:10,19
13:1 14:19 22:25

ago (1) 65:5

agree (5) 21:20 22:11
32:24 55:25 56:10

agreed (2) 12:15 44:17

agrees (1) 37:7

ahead (2) 8:4 23:3

aiming (1) 76:1

air (1) 20:3

alasdair (1) 8:20

albeit (1) 7:19

alex (2) 9:7,7

alison (1) 9:10

allay (1) 82:6

allow (3) 6:19 7:5 89:4

allowing (1) 16:4

allows (1) 83:10

alone (1) 79:14

along (2) 30:1 48:17

alongside (1) 60:11

already (11) 10:22
14:24 24:7 40:10
42:13 52:4 69:10
72:20 83:24 90:8 92:9

also (26) 1:20 3:25
16:13 31:9 34:14,21
35:13 47:21 51:16,17
53:6 60:8 63:16,17
65:2 71:16 73:6
81:13,21,24 83:5,21
87:25 88:5 91:13,16

alternatively (1) 77:12

although (11) 1:8 30:3
42:24 46:14 57:18
60:23 62:3 67:7 73:5

85:12 86:18

always (5) 16:10 48:11
54:6 55:20,24

ambulance (3) 10:9
30:10 39:4

ameliorated (2) 41:3
42:8

amendments (1) 68:20

amongst (1) 49:24

amount (4) 17:8 69:15
75:15 81:25

amounts (1) 17:10

analyses (1) 75:9

analysis (2) 25:12 44:15

analysts (1) 44:19

andor (1) 23:10

andrew (2) 10:3,19

angelika (1) 9:3

another (4) 47:21 69:4
71:13 77:10

answer (6) 26:24 28:10
44:5,20 64:22 92:2

answered (1) 71:24

anticipate (5) 3:16 5:10
20:25 79:1 87:5

anticipated (5) 34:17
36:18 79:3 89:20
91:12

anybody (6) 28:18
67:14 75:21 85:19
88:14 91:24

anyone (8) 3:7 6:20
11:1 35:17 44:19
65:19 81:16 88:21

anyones (1) 27:5

anything (30) 1:25
3:7,12,14 4:24
6:10,15,20 16:3 17:19
20:1 21:4 28:18 35:21
36:4 45:10,22,24
51:15 54:8 65:8 70:16
74:5 75:22 83:22
88:11,23 91:24,25
92:6

anyway (1) 57:12

anywhere (1) 55:16

apologise (1) 70:10

apparent (4) 35:22
48:11 79:6,19

appear (1) 75:12

appears (1) 8:25

applicable (1) 3:2

application (7) 3:3,5
29:4,16,18 30:5 32:11

applications (3) 28:24
29:11,14

applied (1) 15:20

applies (4) 3:12 34:5
85:1 92:4

apply (6) 4:3 15:19
41:19,21 73:23 87:12

appointed (1) 12:20

appreciate (3) 23:19
46:25 60:1

approach (10) 8:16 25:7
31:8 43:19 47:5,10,12
48:23 57:5 74:4

appropriate (9) 4:2 8:13
29:15 31:14 46:23
50:6 79:25 86:4 87:8

approved (1) 33:17

april (12) 13:8 34:12
52:9 57:25 58:4 60:19

61:14 62:22 65:17
67:7,12 80:3

area (1) 33:18

areas (3) 32:13 37:10
61:20

arena (4) 1:8,10 39:6
72:13

arent (1) 75:8

argue (2) 85:3 87:1

argued (4) 16:22 78:9
79:14 84:25

argument (5) 50:3
66:15,16 87:15,16

arguments (5) 47:2
77:25 79:11 86:5 88:3

arise (7) 26:8 27:23
51:2,6 52:5 67:2 84:23

arisen (1) 48:25

arises (1) 26:25

arising (3) 6:6 68:11
71:21

arose (2) 26:11 62:23

arrangements (3) 34:22
36:13,20

arrived (1) 48:21

article (2) 11:13 12:3

ascertain (1) 74:10

ask (6) 47:5,17 48:17
74:17 77:14 90:4

asked (5) 18:15 39:17
45:15 70:6 71:25

asking (1) 46:10

aspect (5) 2:10 25:10
63:17,19 91:3

aspects (1) 1:14

asserting (1) 81:20

assessment (3)
42:16,19 74:8

assist (6) 14:1 39:21
43:6 44:19 46:6 53:2

assistance (2) 54:22
74:18

assisting (1) 63:17

assists (1) 83:13

associated (2) 39:23
64:12

assume (2) 55:14 90:11

assuming (1) 86:24

assurance (6) 71:14
73:23 74:2 76:3,5,10

assurances (1) 80:12

assure (1) 17:21

atkinson (1) 9:1

atrocities (2) 14:2 18:8

attached (1) 59:14

attack (8) 14:9 16:3
17:7,20 30:1 39:6
72:13,15

attacks (2) 14:10 15:14

attend (5) 30:25 31:11
41:7 53:18 54:14

attention (2) 20:4 73:4

attributing (1) 54:4

audio (8) 61:16,19 65:2
69:21 72:7,21 73:1,12

august (10) 58:11,17
59:24 60:1 63:24 64:1
67:12,18 68:12 72:10

austin (1) 9:18

authorities (8) 16:2
81:3,14,19 82:3,9
85:2,14

authority (2) 10:2 78:11

available (9) 31:6
33:5,25 34:21 35:11
60:24 64:3 69:23
79:19

avoid (1) 6:16

avoidance (1) 5:8

aware (7) 1:24 53:5
54:3 67:7 72:25 73:5
90:7

awful (1) 19:1

B

back (14) 27:4,7,18
33:7 40:12 54:16
65:15 66:2 71:13
75:21 84:14
89:3,14,16

background (1) 72:8

backstop (1) 59:8

bad (1) 65:13

baker (2) 51:14 90:9

balance (1) 79:12

bamau (1) 39:10

bang (1) 55:20

barton (22) 5:19 6:8
10:6 53:2,4 54:12 59:8
63:8 64:21 65:8,8
66:3,9,10,13 70:25
71:21 74:14,22 75:5
76:5,11

based (1) 19:25

basis (9) 29:19 30:3
37:13 40:13 51:1
56:17 61:9 66:22
88:23

bay (1) 80:24

bear (2) 1:15 87:5

bearing (4) 12:2 37:19
67:12 87:4

bears (1) 59:11

became (2) 69:19 72:25

become (4) 19:11 56:3
79:19 81:5

becomes (3) 35:21
38:24 56:8

becoming (1) 55:4

before (42) 1:12 4:21
7:16 8:6 11:2,21 12:25
14:19 17:7,9 27:23
31:19 32:4 33:12
34:25 42:18 43:1,8,21
46:13 47:16 51:16
52:15 53:18
55:21,23,25 56:4,22
60:3 65:8,8,12 67:23
70:17 79:9,10 80:3
81:6,15 88:16 89:6

begin (1) 59:23

behalf (13) 5:18,20,23
32:18 41:8 51:9 59:12
63:6,9 65:13 66:23
78:10,16

behaved (1) 39:24

being (30) 6:15 14:11
18:7 20:8 24:18 25:8
27:15 28:8,9 29:8
33:17 34:23 36:14
38:12 39:14 43:25
45:22 49:19 50:14
54:20,23,24 63:25
67:4 69:11 73:2,18,22
77:24 90:2

belief (4) 73:15 75:6
76:16 81:18

believe (5) 61:10 73:16
74:7 90:14,22

believes (1) 24:24

bereaved (8) 5:21 9:6
13:16 34:17 49:12
50:23 63:6 81:23

best (6) 17:22 35:21
69:25 70:1 72:5 81:19

better (1) 86:19

between (15) 8:11 12:9
24:1 30:9 36:22
40:15,18 52:7 58:4
62:2 67:12 68:7
72:9,22 74:25

beyond (1) 3:15

big (2) 81:5,22

bill (3) 81:6,9,9

bishop (1) 80:25

bite (1) 3:17

biting (1) 48:2

bits (1) 56:4

blame (1) 54:4

blanket (1) 42:17

blast (2) 39:11,15

blm (1) 10:4

board (2) 28:15 84:11

body (3) 29:23 30:11
49:2

bomber (1) 1:17

bombing (3) 29:21
61:18 64:18

both (7) 11:15 57:21
75:1,17 79:11 86:2
88:3

bound (2) 89:15 90:8

boyle (2) 9:16,22

break (10) 4:21 6:14
8:7 65:7,9 66:1,7
88:25 89:18 90:19

breakout (1) 34:18

brewster (1) 9:2

bridge (1) 16:8

brief (2) 7:9 77:18

briefed (1) 50:24

briefing (2) 53:13,18

briefings (1) 53:7

briefly (3) 15:3 32:18
47:20

bring (3) 20:3 66:15
92:15

brings (1) 12:25

british (2) 9:25 73:24

broad (4) 7:18 22:25
36:7 37:9

broadcast (2) 31:19
33:4

broadly (1) 33:2

brother (2) 1:16 9:10

broudie (2) 9:15 78:17

brought (1) 18:12

build (1) 1:9

building (4) 33:20
34:1,11 89:6

bundle (3) 11:4,5 49:25

bundles (1) 45:19

business (4) 8:6 37:10
76:21 88:19

butt (1) 10:15

C

calculations (1) 40:14

call (1) 68:11

callander (2) 9:5,11

called (1) 67:24

calls (1) 85:8

came (2) 56:10,11

campbell (2) 9:11,22

candid (1) 71:19

candour (18) 64:8
66:15,16,18,23
71:17,17 80:19,21
81:1,5 82:4 84:20,22
85:1,3,5,8

cannot (5) 40:25 43:12
60:15 62:17 91:21

cant (6) 27:18 28:10
47:3 51:12 52:13 72:3

canter (2) 9:15 78:17

capable (3) 8:1 26:16
40:22

care (2) 29:24 38:24

careful (1) 57:5

carefully (2) 46:1 57:8

carolyn (1) 9:20

carried (3) 17:6 73:22
74:24

carry (3) 14:9 15:14
74:1

carrying (2) 14:1 74:17

cartwright (1) 8:19

cases (5) 16:12,16 62:4
80:20 81:17

catch (1) 71:6

category (3) 29:9 42:13
59:6

catherine (1) 10:12

cause (1) 13:13

caused (2) 24:4 43:14

causing (1) 40:22

cautious (1) 25:7

caveat (2) 75:7,14

caveated (1) 76:16

cell (2) 44:14,18

central (4) 51:19 62:13
63:14,16

centrally (1) 33:20

centre (3) 33:21 34:15
35:9

certain (9) 2:4,11 8:18
16:13 44:5 57:7,12
76:16 91:4

certainty (1) 62:25

chair (3) 12:20 67:22
85:15

chairman (5) 29:14
78:18,20 79:1,3

chairs (1) 82:4

challenge (1) 5:11

challenges (1) 7:4

chance (1) 33:8

change (2) 67:3 85:9

changes (3) 83:6,22
85:11

channel (4) 73:16,17
74:6 75:9

channels (1) 61:20

charged (1) 2:19

chasing (1) 76:7

checked (1) 73:10

checking (2) 38:6,7

checks (4) 38:13 43:16
72:16,18

chief (5) 16:7 64:16
68:18 82:10,11

<p>chloe (1) 9:21 choice (1) 88:9 choices (1) 35:11 chose (1) 68:2 chronologies (4) 59:14,15,17,20 chronology (1) 68:17 circulate (1) 41:11 circulated (5) 8:25 29:18 34:24 40:2 59:15 circumstance (1) 28:5 circumstances (6) 19:24 51:5,7 52:12 79:24 85:6 civil (1) 33:21 claimed (1) 15:10 claims (4) 11:20,23 13:22,25 clarifying (1) 77:2 clarity (2) 41:24 53:4 clear (10) 16:9 20:1 28:24 32:8 46:15 58:5 59:17 78:2 90:23 91:22 clearest (2) 24:23 64:17 clearly (5) 25:20 26:16 30:17 65:10 83:15 client (3) 81:7 87:22,24 clients (1) 63:12 close (1) 34:15 closed (18) 11:21 13:12,20 14:6,14 19:7,8,15,20,22 20:6,17 21:1 22:9,16,17 87:13,16 closely (2) 30:12 43:17 closest (1) 14:15 codify (1) 85:9 codifying (1) 81:5 collins (1) 35:2 combined (1) 10:2 come (21) 15:3 20:7 22:19 28:9 33:7 44:15 46:15,17 52:19 54:7,16 55:20 62:25 64:21 66:1 71:13 75:21 84:14 89:3,14,16 comeback (1) 71:2 comes (1) 38:23 coming (2) 42:18 47:4 command (20) 39:5 58:3,6,13,21 59:1,19,23 60:13,22 61:6,11 62:15 64:24 66:11,21,25 68:6 73:3 79:16 comment (1) 71:17 comments (2) 18:1 45:7 commitment (1) 70:14 committed (3) 14:2 49:11 51:4 committee (1) 17:5 common (2) 27:12 85:1 communicate (3) 53:24,25 55:17 communicated (1) 27:25 communication (5) 28:12 51:19 52:4,23 53:2 communications (6)</p>	<p>61:17 72:9,12,15,17 74:21 company (1) 82:14 compares (1) 75:11 compelling (1) 79:11 compels (1) 85:2 complaining (1) 63:11 complaints (2) 63:18 64:20 complete (3) 34:11 73:13 79:17 completed (2) 52:11 73:19 completely (5) 19:25 21:11 44:17 66:21 92:11 completion (1) 38:13 compliance (2) 31:9,20 comply (2) 3:9 90:10 comprehensive (2) 51:5 72:1 comprehensively (1) 71:24 concentrating (1) 83:17 concern (9) 13:13 18:14 24:5,8,17 26:12 58:2 61:15 73:7 concerned (14) 8:23 18:10 20:22 21:9 22:2,7 29:10 32:8 36:21 39:2 45:9 68:25 87:22 88:21 concerns (10) 7:25 18:7,19 21:10 25:10 27:24 57:17,18,21 62:8 conclude (2) 4:20 40:14 concluded (2) 15:21 40:23 concludes (1) 6:3 conclusion (5) 4:19 15:23 17:5 42:19 43:7 conclusions (2) 16:18 52:20 conduct (1) 14:14 conducted (2) 12:4 73:18 conference (2) 34:14,18 confidence (2) 63:13,20 confident (2) 38:3 40:2 confidentiality (1) 47:25 confirm (5) 25:13,15,22 26:18 36:21 conflict (1) 54:7 confusion (1) 24:5 connected (1) 1:22 consequence (2) 13:10 17:16 consequences (1) 76:18 consider (15) 4:20 8:7 16:24 18:16 26:5 30:23 33:8 42:1 44:12 60:24 61:8 70:23 71:19 86:4 89:1 consideration (8) 4:22 7:23 8:14 17:1,2 19:21 20:21 22:9 considered (8) 16:4 21:3 22:16 26:7 38:23 43:11 47:22 58:13 considering (4) 3:7 7:13 28:23 63:15 considers (3) 30:3 41:18</p>	<p>49:3 consistent (1) 17:13 constable (2) 64:16 68:18 constantly (1) 76:7 constrained (1) 53:12 constraints (1) 49:13 constructive (1) 49:9 consultation (1) 4:22 consulted (3) 4:20 22:7 91:6 contained (1) 64:4 contains (1) 41:11 contempt (4) 1:20 2:3,9 91:2 content (4) 37:18 72:12 77:22 85:24 contentious (2) 85:20,25 contested (1) 49:14 context (6) 50:4,9 64:13 72:8 81:23 85:10 continue (3) 38:10 42:14 43:2 continued (1) 72:11 contrary (1) 42:12 contrived (1) 19:25 control (22) 10:16 39:5 51:14 58:3,7,13,20 59:1,19,23 60:14,22 61:6,11 62:15 64:24 66:11,21 67:1 68:6 73:3 79:16 controversial (4) 37:11 81:3,24 87:23 controversy (1) 84:10 convenient (1) 35:10 convention (1) 12:3 conversion (1) 15:2 convert (2) 33:18 34:1 converted (1) 12:13 converting (1) 33:23 cooperate (1) 80:16 cooperative (1) 37:1 copies (2) 44:21,21 core (49) 1:12 7:2,14 8:12,23 18:10 19:16 22:13,22 25:4 26:1 28:1,16,21,24 29:5,8,11,16 30:8,18 31:23 35:15 37:15 38:1 39:12 41:1,4,17 42:3,18 43:4,9,13 45:3 57:13 59:15 63:7 78:11,25 79:5,20,22 80:1,15 82:23 86:21,25 87:6 cornell (1) 10:7 coroner (3) 11:13 16:7 67:23 coroners (2) 25:17 36:16 coronial (1) 49:1 corporate (2) 58:2 79:16 corporates (1) 82:9 correct (6) 16:12 25:3,24 27:3 40:16 89:22 couldnt (2) 16:22 54:21 counsel (29) 2:20 3:11 4:22 5:18,20,22 6:9</p>	<p>8:18 9:14 10:1,3,6,13,17,20,23 23:4 35:25 36:22 41:7 48:19 59:9 63:2 64:25 67:3 78:22,22 88:20 90:13 counselling (1) 34:20 counsels (1) 41:11 counterterrorism (4) 10:14 11:18 14:4 19:18 course (43) 2:1 3:12 4:16 5:25 6:6,18 15:4,7 19:12 20:12 24:11,15,19 30:8 31:2 32:14 34:3,4 35:25 45:10 46:2,9,10,12 48:8,15 49:18,25 50:7 52:10,14 53:3,12 57:22 59:11 61:7,8 65:2 72:3 82:19 87:20,25 88:7 courtney (2) 9:16,22 courtrooms (3) 33:23,24 34:1 cover (4) 14:23 20:20 70:23 91:13 covered (1) 55:13 covering (1) 30:14 cps (10) 4:23 10:21 27:24 28:5 43:2 46:7,20 47:9,17 84:13 create (4) 1:25 4:24 38:7 42:21 creates (1) 4:11 criminal (19) 2:8 3:17 40:9 48:10 49:14 50:4,14,15,19 53:8,11,14,19,21,25 63:17 64:12 88:7 91:22 criteria (1) 29:3 critical (3) 1:24 60:14 61:13 criticised (1) 29:21 criticism (1) 65:23 criticisms (1) 64:5 crossparty (1) 81:9 crown (15) 3:4 5:19 10:21 28:13 33:22 43:16 48:23 49:7,11,16 51:3,20 57:2,7 92:5 crowns (1) 50:18 cti (12) 3:11 8:12 13:12 14:13 30:3 31:24 35:4 57:18 59:17 60:2,10 79:6 ctis (2) 31:4 86:22 curran (1) 35:3 current (1) 60:18 currently (1) 73:18 curry (1) 9:21 custody (1) 2:25</p>	<p>56:13 57:25 58:14,18 59:7,8 60:4,5,19 61:13 62:19 65:1 68:23 70:15,16 75:25 76:5,19 80:3 87:3,4 88:16 dated (6) 11:22 23:5,7 24:4 33:14 37:17 dates (1) 75:24 dauid (1) 39:10 day (3) 41:8 52:14 73:3 days (5) 21:24 22:6 41:15 56:3 85:13 de (3) 8:19 9:7 90:21 deadlines (1) 38:13 deal (20) 1:11,13 7:8,10,12,18 8:6,24 11:9 13:1 14:7 22:13 28:22 44:16 47:18 64:14 66:10 88:10,11 90:21 dealing (3) 7:16 59:19 66:24 dealt (10) 22:20 26:22 40:6 71:4 79:8,9 84:18 89:3,9 90:16 deaths (1) 81:24 december (13) 38:1 68:22,24 70:4,20 73:20 74:7 75:25 76:2,10 86:14,18,20 decide (5) 15:16 67:22 79:8,12 91:20 decided (2) 16:13,16 decision (9) 15:20,23 16:6,7,10,12 39:20 48:21 56:6 decisionmakers (1) 48:15 dedicated (1) 53:20 deemed (2) 25:15 29:2 defend (1) 83:18 defendants (1) 51:9 degree (1) 32:21 delay (17) 5:5,8 13:6 31:19 33:3 42:24 59:10,12 65:21,22 66:16,25 67:2,6 70:11 71:8,9 delayed (2) 1:3 42:8 delaying (1) 6:13 delays (2) 38:15 70:12 deliver (1) 75:18 delivered (1) 50:21 delivery (1) 50:8 department (2) 10:11 37:2 dependent (1) 74:12 depending (1) 87:17 deputy (1) 68:18 describe (1) 61:16 described (3) 12:6 39:18 57:17 designated (2) 29:1,4 designation (4) 7:14 28:20 29:19 30:6 designed (1) 45:20 desire (3) 13:15 17:11 57:9 desperately (1) 63:13 despite (2) 70:1 72:14 detail (6) 5:12 18:16 43:22 52:3 58:24 71:3</p>	<p>detailed (5) 15:25 16:25 21:12 36:10 88:3 details (6) 3:5 18:17 34:23 40:2 58:20 87:18 determination (2) 12:24 13:9 determine (2) 11:20 85:17 determined (4) 11:13 24:25 62:21 92:19 develop (3) 57:4 63:5 77:24 developed (1) 56:22 development (2) 57:20 85:4 developments (3) 7:9 11:9 13:2 dialogue (1) 49:10 diary (1) 68:20 didnt (2) 32:9 83:8 died (1) 30:2 differed (1) 16:6 difference (1) 24:1 different (2) 16:10 27:9 difficult (4) 71:8 76:25 77:17 84:25 difficulties (3) 28:11 54:18 69:17 difficulty (2) 27:19 28:8 direct (5) 44:20 51:11 76:2 78:18 84:9 directed (3) 62:1 64:20 78:15 direction (2) 12:11 78:14 directions (8) 7:6 38:14 59:7 60:5 75:23 76:12 79:3,25 directly (2) 19:5 27:9 disclose (5) 37:23 41:14,16 42:2 51:11 disclosed (13) 19:9,13 39:12 40:25 42:1,11,13,15,20 43:1,3 52:20,22 disclosure (30) 7:22,24 13:5 20:12 25:9 37:12,16 38:20,22 40:5,6 42:8 43:6 45:15 47:13 48:17 49:3 50:13,14,14 51:17 52:15 56:23 64:9 79:15,15 82:4 84:5,6 86:25 discussed (2) 86:11 92:10 discussing (1) 56:3 discussion (1) 85:8 discussions (4) 50:22 72:22 74:25 87:23 disparity (2) 32:21,22 dispute (1) 47:1 disrupted (1) 76:19 disseminate (1) 45:25 distress (1) 13:14 distressing (1) 31:16 divisions (1) 61:20 dla (1) 10:20 document (2) 11:4 46:4 documents (7) 18:21,25 20:19,20 21:21 38:7 59:22</p>	<p>does (17) 6:9,20 26:4 27:23 28:18 31:11 32:5 37:8 40:17 56:8 60:2 67:2 75:21 79:1 85:19 88:14 91:25 doesnt (3) 36:4 71:12 75:14 doing (1) 45:9 domain (3) 17:12 45:21,24 done (27) 8:9,15 16:3 17:3,19 18:7 26:6 28:9 34:8 35:2,20 36:19 44:2 54:8,8 59:21 60:3,8 64:18 65:10,11 67:16 71:6,12 72:4 75:11 76:3 dont (15) 27:5 29:9 35:15,17 40:3 46:13 51:11 52:12 55:18,19 65:14 73:7 76:5 88:21 92:7 doubt (9) 5:8 16:11 25:5 28:13 35:6 44:14 62:5 65:22 79:10 down (5) 27:23 55:21 64:16 65:21 83:15 draft (6) 60:25 68:19 69:12 70:18 71:11 72:2 drafting (3) 68:15 69:18 72:1 drafts (5) 69:8,11,24 70:5,6 dragged (1) 64:23 drew (1) 73:4 drift (1) 71:12 dualstranded (1) 74:4 due (10) 1:17 20:11 32:14 34:3 49:25 50:6 55:12,15 61:8 88:16 duncan (1) 10:22 during (8) 3:12 4:16,21 41:12 43:23 67:3,12 88:7 duties (2) 50:19 82:22 duty (7) 50:20 81:5 84:20,22 85:1,5,8</p>
D						
<p>daily (1) 51:1 data (1) 73:25 date (42) 2:22 7:3 8:2 12:21,22,25 13:9 29:17 34:12,13 38:1,4,5,8 40:11 49:15,20,20 52:9,16</p>	<p>concludes (1) 6:3 conclusion (5) 4:19 15:23 17:5 42:19 43:7 conclusions (2) 16:18 52:20 conduct (1) 14:14 conducted (2) 12:4 73:18 conference (2) 34:14,18 confidence (2) 63:13,20 confident (2) 38:3 40:2 confidentiality (1) 47:25 confirm (5) 25:13,15,22 26:18 36:21 conflict (1) 54:7 confusion (1) 24:5 connected (1) 1:22 consequence (2) 13:10 17:16 consequences (1) 76:18 consider (15) 4:20 8:7 16:24 18:16 26:5 30:23 33:8 42:1 44:12 60:24 61:8 70:23 71:19 86:4 89:1 consideration (8) 4:22 7:23 8:14 17:1,2 19:21 20:21 22:9 considered (8) 16:4 21:3 22:16 26:7 38:23 43:11 47:22 58:13 considering (4) 3:7 7:13 28:23 63:15 considers (3) 30:3 41:18</p>	<p>cornell (1) 10:7 coroner (3) 11:13 16:7 67:23 coroners (2) 25:17 36:16 coronial (1) 49:1 corporate (2) 58:2 79:16 corporates (1) 82:9 correct (6) 16:12 25:3,24 27:3 40:16 89:22 couldnt (2) 16:22 54:21 counsel (29) 2:20 3:11 4:22 5:18,20,22 6:9</p>	<p>covered (1) 55:13 covering (1) 30:14 cps (10) 4:23 10:21 27:24 28:5 43:2 46:7,20 47:9,17 84:13 create (4) 1:25 4:24 38:7 42:21 creates (1) 4:11 criminal (19) 2:8 3:17 40:9 48:10 49:14 50:4,14,15,19 53:8,11,14,19,21,25 63:17 64:12 88:7 91:22 criteria (1) 29:3 critical (3) 1:24 60:14 61:13 criticised (1) 29:21 criticism (1) 65:23 criticisms (1) 64:5 crossparty (1) 81:9 crown (15) 3:4 5:19 10:21 28:13 33:22 43:16 48:23 49:7,11,16 51:3,20 57:2,7 92:5 crowns (1) 50:18 cti (12) 3:11 8:12 13:12 14:13 30:3 31:24 35:4 57:18 59:17 60:2,10 79:6 ctis (2) 31:4 86:22 curran (1) 35:3 current (1) 60:18 currently (1) 73:18 curry (1) 9:21 custody (1) 2:25</p>	<p>dealt (10) 22:20 26:22 40:6 71:4 79:8,9 84:18 89:3,9 90:16 deaths (1) 81:24 december (13) 38:1 68:22,24 70:4,20 73:20 74:7 75:25 76:2,10 86:14,18,20 decide (5) 15:16 67:22 79:8,12 91:20 decided (2) 16:13,16 decision (9) 15:20,23 16:6,7,10,12 39:20 48:21 56:6 decisionmakers (1) 48:15 dedicated (1) 53:20 deemed (2) 25:15 29:2 defend (1) 83:18 defendants (1) 51:9 degree (1) 32:21 delay (17) 5:5,8 13:6 31:19 33:3 42:24 59:10,12 65:21,22 66:16,25 67:2,6 70:11 71:8,9 delayed (2) 1:3 42:8 delaying (1) 6:13 delays (2) 38:15 70:12 deliver (1) 75:18 delivered (1) 50:21 delivery (1) 50:8 department (2) 10:11 37:2 dependent (1) 74:12 depending (1) 87:17 deputy (1) 68:18 describe (1) 61:16 described (3) 12:6 39:18 57:17 designated (2) 29:1,4 designation (4) 7:14 28:20 29:19 30:6 designed (1) 45:20 desire (3) 13:15 17:11 57:9 desperately (1) 63:13 despite (2) 70:1 72:14 detail (6) 5:12 18:16 43:22 52:3 58:24 71:3</p>	<p>discussed (2) 86:11 92:10 discussing (1) 56:3 discussion (1) 85:8 discussions (4) 50:22 72:22 74:25 87:23 disparity (2) 32:21,22 dispute (1) 47:1 disrupted (1) 76:19 disseminate (1) 45:25 distress (1) 13:14 distressing (1) 31:16 divisions (1) 61:20 dla (1) 10:20 document (2) 11:4 46:4 documents (7) 18:21,25 20:19,20 21:21 38:7 59:22</p>	<p>earlier (8) 4:14 11:15 29:13 46:19 53:10 59:24 64:2 80:14 earliest (1) 58:18 early (7) 38:2 72:17,22 77:6 81:20 84:7 85:13 easier (1) 15:13 easy (1) 35:8 echo (3) 47:20 48:5 60:10 effect (4) 23:15 26:17 52:4 83:17 effective (1) 49:9 effectively (1) 78:12 effort (1) 35:5 efforts (1) 70:2 eight (1) 40:13 eighth (1) 3:3 eilidh (1) 9:3 either (4) 46:2 54:4 69:4 77:14 elaine (2) 9:4,17 election (1) 81:11</p>

electronically (3)
44:2,6,22
elements (1) 20:6
else (7) 28:18 37:8
65:19 67:14 88:21
89:6 91:24
elsewhere (2) 45:8
80:18
email (9) 33:14 34:8
53:15 59:8,10,14,15
61:3 69:17
emails (1) 68:7
emergency (5) 29:20
39:5 59:3 60:15 61:25
emphasise (1) 13:11
employees (1) 82:14
enable (2) 7:1 31:10
encountered (1) 69:18
end (8) 19:20 40:18
46:13 55:14,16 68:23
76:7,10
endangering (1) 17:13
endeavour (2) 38:10
43:5
endorse (1) 35:8
engage (1) 32:22
engaged (3) 2:20 11:13
31:12
engineers (2) 74:2,9
england (4) 29:17,19,22
30:5
enormous (2) 68:16
69:15
enough (1) 63:22
ensure (17) 3:9 4:10
13:7 14:13 31:9,20
34:10 38:7 43:3 44:20
50:20 57:5 71:4,11
73:12 89:22 90:15
ensuring (2) 49:12 51:4
entire (1) 44:9
entirely (11) 16:10
21:20 27:3 28:6 32:8
36:5 43:18 48:8 56:10
75:16 92:7
equally (3) 4:3 56:2
77:5
essential (1) 65:11
essentially (1) 47:10
establish (3) 12:17
83:21,22
established (3) 12:19
36:14,25
establishing (1) 49:23
establishment (2) 7:12
23:1
estimate (1) 40:13
even (8) 13:13 40:18
52:24 61:9 81:16 82:3
87:6 88:17
evening (1) 60:22
event (3) 58:22 79:20
90:8
events (5) 15:7 39:13
51:8 63:15 81:3
eventuates (1) 76:16
ever (1) 64:6
every (3) 41:8 71:24
85:25
everybody (6) 19:7
35:10 46:7 47:24
55:21 89:6
everybodys (3) 70:1

77:13 81:19
everyone (17) 5:14 8:17
13:14 14:13 17:21
23:18 37:8,19 38:22
52:10,17 57:11,22
71:5 78:3,13 89:7
everyones (1) 89:8
everything (7) 35:19,20
47:18,20 48:3 74:10
86:24
evidence (40) 7:17
13:5,6,7,11 15:17
17:9,15 19:9,21
20:6,7,8 22:15,19 25:5
30:21 31:4,6,15,18
33:3 34:7,20 39:21
41:4,12,14,19,25 42:4
44:15,16 48:24 50:25
62:20 68:2 79:17
87:2,9
exactly (3) 48:13 67:23
90:11
examination (2)
17:18,23
example (7) 19:25
22:18 31:16,20 32:5
44:13 59:22
exceptions (1) 37:24
excluded (1) 56:4
exclusion (1) 19:2
exclusively (1) 81:2
executive (1) 82:11
exercise (6) 47:23 48:16
73:10,13 74:9 89:22
existence (2) 20:4 47:23
existing (1) 75:12
exists (3) 5:10 90:23,24
expand (1) 84:12
expect (5) 27:13 34:23
42:14 76:1 79:21
expectation (1) 72:14
expected (3) 34:11
50:25 51:2
expedition (1) 89:9
expeditiously (1) 48:6
expended (1) 81:25
expensive (1) 82:1
experience (4) 19:6
48:9 85:7 87:25
expert (7) 39:8,21,25
44:15 79:17 87:2,9
experts (14) 7:22
37:12,16
39:2,4,9,11,13 40:1
60:15 62:9,15 73:6
74:19
explain (4) 15:3 38:22
45:16 63:1
explained (4) 13:21
23:20 36:9 42:22
explanation (4) 27:13
28:4,4 56:16
explanations (1) 61:8
explore (1) 77:8
explored (1) 25:5
exports (1) 39:15
express (2) 5:15 11:24
expressed (5) 24:8
25:11 41:23 57:9 73:6
expressing (2) 3:8 17:11
expressly (1) 12:5
extended (1) 62:3
extensive (3) 44:14

52:4 65:23
extent (12) 14:16 19:2
20:13 37:11 42:9
46:16 53:12 57:19
64:24 77:8 81:6 82:24
extremely (3) 47:20
65:23 71:12
extremism (1) 39:22

F

face (1) 7:5
facilities (1) 34:16
facility (1) 34:18
factor (2) 28:2 47:21
factors (3) 41:3 48:4,18
failings (2) 18:13 82:5
failures (4) 64:9
83:1,3,3
fair (4) 48:11 50:8,20
65:18
fairly (1) 48:6
fairness (1) 2:7
faith (1) 65:13
fall (1) 29:9
fallen (1) 43:16
falling (1) 59:5
false (2) 20:23 66:22
familiar (2) 45:17 55:22
families (52) 5:21
9:6,20 13:17 15:9
17:14 18:5,10,18
19:1,13 20:9 21:10
28:2,3,6,9 32:6,19,20
34:17,19 45:11
46:5,8,9 48:7
51:18,22,25
53:6,16,17,22
54:6,9,9,20 55:5
56:15,24 57:9
63:6,12,19 65:18
70:10 78:17 80:15
81:22 89:4,5
family (14) 3:23 5:23
9:1,9 23:10,25
24:10,20 53:5,14,20
54:5 91:15 92:8
far (19) 8:23 18:23
19:14 21:10 28:15
29:9 30:13 32:8 35:20
36:20 37:23 38:11
39:2 53:10 75:11
79:17 82:21 87:22
88:20
father (4) 9:11,16,16,21
fault (2) 36:5 70:11
favour (1) 23:13
favourite (1) 86:1
fawell (1) 9:2
february (3) 23:7,12
40:15
feel (1) 31:12
feels (1) 86:15
feet (2) 19:5 64:23
few (10) 1:11 20:17
39:6 43:1 56:21 77:21
78:7 86:1 89:5 90:5
field (1) 8:22
fifth (2) 2:22 5:25
filed (1) 23:4
final (10) 23:15 37:9
68:18 69:8,11,12,22
70:4 71:10 76:20

finalised (3) 34:23
39:15 68:22
finally (8) 5:25 7:16,21
8:2 25:13 36:2 63:8
83:10
find (2) 35:13 71:8
finding (2) 35:8 69:4
findings (1) 14:17
fine (1) 86:7
finish (1) 32:4
finished (2) 6:13 70:19
fiona (1) 10:6
fire (2) 10:16 39:4
firmly (1) 24:24
first (33) 1:7,16,22 2:14
5:18,22 7:8,12 8:17
9:1 13:1,3 15:1 21:16
22:25 23:1,5 25:21
35:11 42:7 44:25 55:7
58:2 63:5 66:11
67:8,15 80:13 83:12
86:8 89:4 91:11,25
fisher (1) 8:22
fit (1) 34:10
fixed (1) 49:20
flag (2) 19:6 20:11
flexibility (2) 75:4,17
flos (1) 53:20
flow (1) 1:22
focusing (2) 83:13,25
follow (3) 31:7,10 92:7
followed (2) 7:9 53:15
following (10) 7:11
11:19 25:21 33:16
36:10 39:25 40:20
68:21 72:22 78:14
follows (10) 1:8,18 2:13
13:23 29:10 37:21
42:23 58:8,22 80:14
footage (1) 33:4
forget (1) 89:2
form (2) 25:2 50:5
formal (1) 11:8
formally (5) 5:3 11:2
21:24 26:3 58:12
forms (2) 3:25 4:5
forthcoming (2) 49:5
50:25
fortunately (1) 70:17
forward (1) 81:15
found (6) 11:5 64:7,9
72:19 73:10 74:10
foundation (2) 25:12
29:25
four (4) 1:22 58:25
69:17 70:17
fourth (5) 2:20 3:19
5:23 11:11 24:7
fourthly (1) 4:9
framework (1) 12:4
francesco (1) 9:7
francis (1) 80:23
frankly (1) 63:22
free (1) 41:19
friend (5) 1:1 41:21
42:3 78:20 79:2
full (6) 25:2 37:19
46:21 48:18 57:3 66:3
fieldwork (4) 10:10
30:9,11,15
fully (3) 11:25 49:12
80:16
funding (1) 81:25

further (26) 5:12 7:5
8:7 11:2 13:18 14:10
15:11 18:16 19:4
21:22 28:7 29:4,13
33:24 38:14,20 39:17
49:3 50:17 53:18 61:6
69:19 79:4 84:2
86:11,13
furthermore (2) 11:16
25:7
future (3) 18:8 34:24
83:22

G

gap (1) 73:1
gaps (4) 59:21 62:10
75:9,13
gather (1) 43:22
gathering (1) 13:4
gave (3) 39:19 59:13
60:5
general (8) 7:23 12:10
20:10 37:13 63:13
65:19 80:7 82:18
generality (1) 91:9
generally (7) 28:12
32:1,14 35:4 81:12
85:5,12
generic (1) 21:8
georgina (2) 9:5,11
get (6) 71:14 80:15
83:21 88:16 89:5
90:21
getting (1) 65:10
gibbs (4) 10:1 85:24
87:21 88:2
gift (1) 27:6
gist (1) 20:8
gisted (5) 20:7 21:4,5,9
22:10
gisting (2) 19:21 21:4
give (21) 4:22 7:5
18:18,23 19:24 22:19
41:21 53:4 65:9 66:3
70:8 71:3 72:7 74:20
75:6,12 76:6 79:25
85:19,22 88:17
given (16) 17:3 19:21
20:21,23 22:7,9 38:12
41:5,12 48:18 51:1
56:17 58:7 66:4 70:6
88:9
gives (1) 85:7
giving (4) 20:23 54:25
58:14 70:12
gmp (60) 4:23 10:6,8
39:14 43:2 50:22
51:20 53:5,9,23 57:21
58:3,4,7,8,12,20,22
59:4,5,12,21,24
60:6,8,12
61:17,18,19,21 62:23
63:1,24 64:13 66:18
67:11,13,25 68:12
69:13,14,18
72:4,8,11,16,21,23,25
73:4,13,15,22
74:1,5,18,25 75:17
76:16 87:4
gmgs (2) 62:9 70:14
goddard (1) 9:19
goes (5) 30:13 46:11
86:24 89:6 90:22

going (32) 14:23 28:4
35:10 36:7 43:22
45:12,25 46:17
52:1,2,3 53:16 54:17
55:16 57:16 63:12,22
65:3,10 74:1,21
75:3,15 77:14 85:21
86:6,10 87:13
88:16,17 89:12 90:4
gone (3) 16:20 77:4
85:9
good (10) 1:7 34:11
43:12 44:4 47:3 52:24
63:22 69:20 80:7
87:21
gordon (2) 9:8 32:18
government (4) 15:5,10
16:21 22:3
grainger (2) 64:4 65:15
granted (1) 29:13
grateful (5) 26:21 35:13
38:11 54:2 89:8
greaney (51) 1:6,7 6:23
11:7 14:22,24 18:9,14
21:14 22:5 26:22
28:19 30:19 32:3
33:11 35:14,24 36:5,6
43:24 44:4,24 45:6
46:11,14 47:7 48:19
56:21 63:21 64:14
76:14,15 77:18,21
78:5 84:12 86:6,8,16
87:14,20 88:5,13,20
89:7,12,20 90:4,14,21
92:10
great (2) 22:13 38:23
greater (14) 5:20 10:2,5
18:8 29:23 48:5 60:23
63:9,14 64:5,10,22
65:21,24
group (1) 92:9
guarantee (1) 72:4
guess (1) 28:5
guidance (1) 68:13
guide (1) 83:7

H

hadaway (1) 10:18
half (1) 61:2
halt (1) 92:16
hand (3) 36:24,25 37:5
hands (2) 67:11 77:13
happen (4) 27:6 52:1
75:3 83:8
happened (3) 16:1
51:16 83:9
happening (3) 31:13
51:23 83:23
happens (1) 52:11
happier (1) 60:21
happy (5) 21:5 56:12
77:8,13 78:1
hard (3) 44:21 57:23
60:7
hardy (2) 9:12,22
harm (1) 15:12
harris (1) 80:25
hashem (25) 1:16,19
2:2,11,24 3:4,15 4:12
5:1 7:24 24:12,12
26:13 38:8 40:6,11
44:13 45:19,24 46:6

51:13 57:24 60:13
91:3,19
hasnt (3) 52:11,21 85:9
having (2) 77:7 83:2
having (23) 4:20 5:5,16
8:1 11:14 13:24,24
15:20,23 16:24
20:5,15 25:20 26:16
29:7 40:3 43:20 60:12
62:16 63:4 78:13
91:21 92:10
head (1) 44:7
heading (5) 7:16 25:13
28:20 36:7 37:13
headline (1) 80:20
headquarters (1) 10:14
health (1) 29:24
hear (11) 5:17 17:15
30:25 46:14 56:5 66:2
68:2 78:1 80:6 86:5
90:2
heard (13) 4:7 6:11
8:12 13:12,24 15:17
17:9 19:22 20:5 41:25
55:7 57:8 76:17
hearing (55) 1:7
3:13,13,19 4:11,16
6:25 7:1,4 8:5,16
11:12,12,19,20 13:6
14:14 15:1
19:8,8,15,22 20:6
23:3,12 24:8 26:12
31:11 33:19,23 40:9,9
43:11 46:20 48:1
55:15,17 63:1 70:18
71:13 77:11 78:20
79:2 80:2 84:15,15
86:5,11 88:5,6 89:14
90:25 91:5 92:5,15
hearings (21) 1:9 4:14
7:15,17 11:15 13:7,20
14:7 16:19 19:7,20
21:1 22:9 30:21 31:5
33:25 34:7 44:16
46:13 50:24 62:21
held (2) 58:20 73:25
help (6) 14:8 15:2 56:18
84:19 90:10,13
helped (1) 54:19
helpful (8) 28:1 45:2
46:4 76:23 78:3,5 80:6
92:14
helpfully (1) 8:3
henderson (1) 8:20
here (14) 10:25 26:25
28:4 47:6 52:24 55:17
63:12,16 64:20,22
76:24 82:7,10 85:1
hes (1) 86:16
hett (2) 9:4,17
highest (1) 64:19
highly (1) 5:11
himself (1) 45:24
hiring (1) 34:22
hmg (1) 10:12
hogan (1) 9:24
hold (1) 21:11
home (23) 2:16 10:11
11:17 12:12,16,19,23
23:16 24:16,23 25:23
26:5,9,23
27:1,4,9,17,20,25
36:14,24 37:2

honing (1) 83:13
hope (12) 5:13 6:11
8:14 14:11 15:2 25:20
52:12 53:4 71:11,23
76:15 85:13
hoped (1) 47:9
hours (6) 5:9 61:19
62:2,2 69:21 72:20
howe (1) 9:10
however (11) 13:14
17:17 18:9 24:22
31:14 38:5 40:20 51:6
59:8 60:13 73:8
huggell (1) 9:15
huggells (1) 78:18
huge (2) 69:14 75:15
hundreds (1) 67:14
hurley (1) 9:2
husband (1) 9:5

I

id (2) 6:19 32:10
idea (7) 20:18 21:7 32:7
52:2,24 73:8 80:8
ideal (2) 35:19 88:8
identified (11) 2:12,12
3:16 38:18 40:1,22
42:3 50:13 67:18
83:19 91:4
identifies (1) 50:2
identify (4) 49:1
67:9,16 73:14
identifying (1) 21:21
identity (1) 2:14
ie (1) 55:24
ill (17) 1:11,13 28:19
37:7,20 39:6 40:5,7
57:20 61:16 65:9
76:15,20 80:9 86:8
89:16 90:17
im (35) 14:23 17:15
19:4 20:22 26:21,24
32:8 35:13 36:7 40:2
46:18 52:16 54:2,17
56:17,19 57:24
63:11,11,22 65:2,25
66:4 75:25 76:24
77:12,13,14 78:1
85:24 89:7,8 90:4,4
92:3
imagination (1) 36:3
imagine (3) 26:17 27:18
74:15
immediately (2) 57:25
73:3
imminent (1) 1:21
immunity (2) 18:22
19:10
impact (5) 8:1 25:9
40:21 48:11 81:22
impeded (1) 2:2
impediment (1) 34:13
imperatives (1) 18:6
implications (1) 50:18
importance (4) 1:24
62:13,16,16
important (11) 5:6
27:22 28:3,15 30:20
31:13 36:8 54:7 58:9
67:20 79:7
importantly (2) 7:21
82:25

imposed (3) 8:8 31:3
49:14
impression (1) 20:23
improve (1) 82:4
incident (3) 61:21 67:15
83:7
include (4) 25:15 33:22
46:2 50:2
included (2) 16:1 27:10
including (9) 3:13 15:8
16:18 24:11 25:1
30:24 46:7 49:23
79:15
incomplete (1) 62:19
incursion (1) 5:6
index (2) 49:25 93:1
indicate (10) 19:1 26:13
42:5 53:13,22 55:8
69:16 77:22 83:2
87:21
indicated (15) 4:17
10:7,22 23:8 24:7,23
40:10 47:7 49:8
61:1,24 72:20 78:8
83:15 90:25
indicates (3) 41:25
63:21 88:1
indicating (2) 51:25
88:22
indication (5) 18:23
41:13 75:6,13 85:20
individual (1) 29:1
individuals (9) 29:7
38:18 58:16
67:16,17,19 68:4,5,8
inevitably (3) 42:24
44:9 71:7
infer (1) 65:13
inform (4) 26:5 46:5
51:21 62:14
information (13) 13:16
16:18,21 17:12 20:3
21:22 43:5 53:9,24
54:25 57:4 63:25 70:1
informed (4) 49:13
50:23 51:15 80:17
informer (1) 20:4
initial (1) 68:4
initially (2) 11:21 68:25
injured (3) 30:1 49:12
50:23
innocent (1) 14:9
input (1) 36:1
inquest (9) 1:10 15:6,8
16:5,15,20 25:18 29:2
36:17
inquests (20) 3:22 4:2
7:19 11:14 12:4,13
16:8,13 23:11,20 25:1
33:13,19 34:2,5 35:2
36:8,15 81:14,23
inquestsinquiry (1) 12:6
inquiries (7) 12:21 15:4
31:18 81:14,23 82:1
89:24
inquiry (86) 1:8 2:5
3:13 4:1,3 7:13,14
8:18,21 12:14,18,20
13:4 15:2,25 16:17
21:12 23:1,2,17 24:24
25:6,10 29:5,12
30:6,25 31:2 33:15
34:5,6,7 36:9,14,23,23

37:14 38:17,23
39:3,19 40:19
41:7,8,10,16 43:2
49:1,2,7 50:6
52:9,13,14 53:21
58:4,11,18 60:9,12
61:16 62:11,13,15
63:17 64:4,7,11,25
65:15,17 72:23,23
78:23 80:16,18 82:8
83:13,14,20 84:8
85:15,17 88:20 91:13
92:18
inquiries (5) 28:23 31:7
34:10 62:8 87:1
inquisitorial (1) 67:22
insistent (1) 65:16
insofar (1) 22:12
inspects (1) 75:8
instantly (2) 35:11
85:19
institution (1) 84:5
institutional (3)
82:14,17 83:18
instruct (2) 39:21 68:7
instructed (11)
9:7,14,18,23
10:1,4,7,10,17,20 39:9
instruction (2) 39:3
71:7
instructions (3) 32:2
33:1 64:17
insufficient (1) 41:24
integrity (1) 49:4
intelligence (1) 17:5
intend (5) 4:18 8:9
37:22 52:13 55:23
intention (1) 51:20
interest (8) 1:23 5:7
15:18 18:22 19:10
48:5 80:15 83:16
interested (10) 5:24
12:8,15 15:8 23:14
29:2,7 33:15 36:17
70:24
interests (2) 65:25
81:19
interfere (1) 45:10
interpreting (1) 92:4
interrelation (1) 30:9
interviewed (1) 3:4
into (26) 2:25 5:6 12:14
15:25 16:11 17:6
19:15 20:9 29:9 36:1
37:10 38:23 39:22
45:23 48:14 52:3 54:7
57:16 59:6 61:25
64:21 66:15 77:4
81:23 87:18 89:14
investigate (2) 24:24
25:19
investigated (1) 17:21
investigating (1) 62:24
investigation (10) 7:22
11:25 16:25 17:6
19:14 23:8 37:12,15
61:25 84:1
investigations (2) 19:2
50:16
invite (18) 1:14 4:6
5:16 8:11 25:21 30:6,7
31:22 37:4 40:4,5 43:8
46:20 47:11 55:8

75:23 78:21 89:24
invited (3) 12:5 25:14
53:17
inviting (3) 12:12,17
34:25
involve (3) 7:13,23
16:23
involved (9) 28:2 38:6,9
59:2 67:15 71:10
72:10 78:4 82:9
involving (1) 69:15
ironed (1) 54:23
irrelevant (1) 44:11
irrespective (1) 84:23
irvine (1) 10:1
islamic (1) 39:22
isnt (1) 66:17
issued (1) 39:3
issues (31) 6:24 11:15
14:17 20:16,25 21:2
22:15 28:2,8 30:14
37:15 39:18,23
44:11,17 46:8 50:12
51:2 57:4,24 58:7
59:19 60:2 62:15
76:25 77:2 80:24 82:9
83:14 91:8,10
item (1) 13:1
items (4) 7:10 14:19
20:24 22:24
itll (3) 19:17 45:17
77:21
its (47) 6:16 19:5 25:2
26:7 27:2,5,7,8,14,21
28:3 30:3,11 35:8 48:8
50:20 51:23 52:21,22
54:7 55:4,12 56:2,12
60:11 61:24 63:3
64:23 67:11 70:11,13
72:4 74:19 77:5,6,17
79:6,13 80:7
81:9,11,17 82:14
83:19 85:12,21,24
itself (7) 3:5 34:21
50:18 52:6 84:5 85:17
88:7
ive (6) 10:22 40:10
55:7,10 83:24 85:16

J

jackson (2) 9:15 78:17
james (1) 80:25
jamieson (6) 9:7
32:16,17 33:10 47:20
48:13
jane (1) 9:20
january (15) 1:18 23:5
40:12 49:21 50:21
52:7 84:16
86:12,22,22,23,24
88:6 92:16,18
jeopardise (1) 2:6
jeopardised (1) 58:1
jeopardy (1) 65:1
jeremy (1) 51:14
jesse (1) 8:20
john (82) 1:6 6:4,7,9
9:1 11:5 14:22 18:4
20:14 22:1
26:11,16,20,24 27:13
28:11,18 30:9,14,16
32:4,15 33:7 35:8,18
36:3 43:21,25 44:23

45:4 47:16 48:8,22
51:10 52:8 53:3
54:2,15 55:10,18
56:2,16,20 63:10 65:6
66:5,9,12 70:21 71:1
74:12,15,23 75:20,25
76:9,12,22 77:20 78:1
80:5,11 84:17,19,22
85:18 86:3,7,15
87:11,15 88:4,11,14
89:2,8,15 90:2,7,17
91:24 92:13
jones (1) 9:3
judge (4) 2:15 49:22
56:5 64:7
judgement (2) 5:2
79:21
judgment (2) 13:21
30:4
judicial (1) 85:6
july (7) 3:24 11:11
23:14 33:14 45:14
58:19 67:16
june (1) 72:10
junior (1) 41:7
jury (4) 49:24 55:23,25
56:5
justifications (1) 13:25
justified (1) 15:17

K

kate (1) 10:7
keep (2) 13:16 28:16
kelly (1) 9:2
key (3) 58:20 67:16,17
kind (1) 92:13
kiss (1) 9:20
klis (2) 9:3,3
know (17) 4:18 8:18
13:8 14:19 26:24
32:20 35:15 41:4
45:17 55:19 56:8
65:20 73:7 74:6 85:25
88:21 90:11
knowledge (2) 27:12
82:19
known (8) 16:2 17:7,18
48:16 56:14
58:8,22,23
knows (2) 78:13 84:5

L

la (2) 8:19 90:21
lack (5) 64:8 66:18,23
71:17,17
large (4) 17:8,9 33:23
92:9
last (3) 7:4 26:12 60:21
late (3) 60:21 64:21
71:7
later (4) 41:15 62:3
64:13 80:2
latest (1) 86:20
latham (1) 39:10
lawyer (1) 85:25
lawyers (10)
19:13,15,16 20:9
45:19 48:9 54:5,9,21
89:10
lead (2) 18:7 71:9
learned (5) 9:13 48:19
49:8 50:1 55:8

least (4) 26:1 28:6 60:2
86:5
leave (3) 40:17 69:3
89:4
leaves (2) 61:11 69:9
leczkowski (1) 9:12
led (3) 28:7 71:8 85:8
lees (2) 9:4,10
left (1) 88:8
legal (13) 6:9 7:1 10:25
11:3 13:4 15:19 17:16
38:17 41:8 50:3 51:25
61:16 85:5
legislation (1) 3:2
lengthy (1) 74:16
less (4) 14:3 80:22
83:14 88:8
let (1) 79:14
lets (2) 71:14 86:18
letter (4) 24:22 51:24
67:18 68:11
letters (1) 39:3
level (1) 64:19
liable (1) 13:13
liaise (1) 69:3
liaison (3) 53:5 54:5,8
liam (1) 9:21
lie (1) 75:13
life (1) 89:11
like (14) 17:21 35:1
36:2,4 51:16 54:16
67:24 68:2 71:2 72:7
82:6 84:2 88:11,24
likely (13) 14:3,11
31:17 34:2 50:2,3
67:10 76:17 84:15
85:20,24 87:22,25
limit (1) 40:20
limited (7) 4:9 22:21
30:11 46:1 73:16,17
75:7
line (2) 47:4 64:16
link (1) 31:6
linked (1) 84:20
lisa (2) 9:4,10
list (7) 8:25 10:24 39:19
60:2 67:17,25 68:4
listed (1) 11:4
listing (1) 58:12
live (7) 1:19 4:14 7:15
30:20 32:25 34:19
81:11
livenote (1) 43:22
lives (2) 14:10 15:16
livestreamed (6)
31:5,15,18 32:7,10
33:25
located (1) 33:20
location (1) 34:6
lodged (2) 79:5 91:19
logical (2) 47:8 57:1
london (1) 16:8
long (7) 7:20 21:2 25:3
28:22 55:18 64:23
80:11
longer (2) 65:18 88:17
longterm (1) 69:2
look (6) 19:9 36:2,4
75:14 83:7,20
looking (3) 71:10
83:18,20
loop (1) 28:16
loss (1) 15:16

lot (3) 19:1 35:12 86:2
lovells (1) 9:24
lunch (1) 4:21

M

macleod (1) 9:3
magistrates (5)
33:18,20,24 34:9,15
maintain (1) 61:13
maintains (1) 49:9
major (1) 81:3
makes (1) 28:24
making (10) 13:5 15:20
16:9 17:10 26:3,12
51:18 79:2 83:14 92:3
manage (4) 43:6 61:21
73:25 88:15
management (3) 49:21
50:17 52:6
manchester (23) 1:8,10
5:20 10:2,5 14:2
29:23,24 33:18,21
35:9 60:23 63:9,14
64:5,10,18,22
65:19,22,24 72:13
81:8
manifestos (1) 81:10
manner (1) 33:4
many (7) 12:7 15:16
18:9 30:1 79:8 88:1
89:10
march (1) 40:15
mariel (1) 10:1
martin (1) 9:3
martyn (2) 9:4,17
mary (1) 9:2
material (64) 5:6 14:7,8
15:5,6,11,15,21
16:4,13,24 17:1,2
19:12,17
20:13,16,17,20,24
21:7,8 22:10 38:19,24
40:7,24,25
42:11,13,14,20,25
43:10,12,16 44:3,6,10
45:16,18
46:15,17,23,25 47:1
48:25 49:2,6 51:12
55:24 56:7,10 57:10
65:12 69:15 71:25
74:13 75:15,18 76:2
77:7 79:19,23
materials (8) 7:25 37:25
38:16,25 42:18 43:3
56:25 57:14
matter (21) 6:6 26:5,11
30:4 31:13 32:9 36:19
50:3,5,6 55:12 62:20
71:20 73:4 77:12
81:13 85:10 86:5
87:7,8 89:3
matters (27) 1:22
2:12,12 3:15,18 14:1
15:5 22:4,20 24:25
32:23 40:3 50:2
51:14,17 52:5 64:14
68:14,25 77:8 83:11
84:9 87:13,18 88:9
89:21 91:4
matthew (1) 10:15
maybe (1) 77:2
mayor (1) 81:8

mcgahey (6) 10:13
 25:22 26:3,15,19 27:3
 mciver (2) 9:4,17
 mean (3) 42:25 45:16
 56:8
 meaning (1) 1:20
 means (1) 31:5
 meant (3) 15:13 46:16
 67:5
 meantime (1) 25:7
 meanwhile (2) 73:21
 74:8
 media (3) 3:8 4:15
 20:10
 medical (1) 69:5
 meeting (7) 20:22
 34:18 36:22 54:12
 58:3 68:18,22
 megan (1) 9:2
 member (2) 6:1 92:7
 members (10) 6:11
 9:1,9 23:11 24:11,21
 30:24 35:24 53:20
 91:14
 mentioned (3) 37:17
 41:17,17
 mere (1) 56:6
 met (2) 13:9 29:3
 mi5 (1) 19:17
 michelle (1) 9:20
 mick (1) 35:2
 might (14) 15:2 24:12
 26:13 33:4 36:6 49:4
 52:22 59:19 64:15
 67:25 68:2 69:6 75:13
 77:23
 mind (9) 1:15 12:2
 25:25 37:19 52:17
 67:13 83:18 87:4,5
 minds (1) 24:6
 mine (1) 36:5
 minutes (3) 77:21 78:7
 89:5
 miracle (1) 35:19
 misleading (1) 21:22
 misled (2) 64:10,11
 missed (1) 10:25
 missing (3) 70:2 72:7
 74:6
 misunderstandings (1)
 54:10
 mix (1) 47:22
 moderated (1) 57:19
 moderately (1) 57:9
 moment (13) 6:21 21:1
 47:3 52:18 57:20
 58:17 68:16 74:16
 75:14 77:7,14,25 90:5
 moments (2) 1:11 39:6
 monday (2) 41:10,24
 months (8) 7:10 34:2
 58:8,23,25 59:24 65:4
 70:17
 more (18) 5:9 14:10
 15:16 32:2 34:23 35:3
 37:11 46:22 52:22
 59:21 65:4 67:13 71:3
 77:16,21 78:7 85:6
 86:15
 morecambe (1) 80:24
 moreover (2) 34:8 60:10
 morning (1) 1:7
 mortal (1) 20:5

most (8) 8:3,13 37:16
 45:8 53:13 57:5 67:10
 87:2
 mother (3) 9:5,10,22
 move (5) 28:19 36:7
 39:6 57:16 76:20
 moved (1) 71:5
 movements (1) 44:13
 moving (1) 37:10
 ms (26) 5:19 6:8 25:22
 26:3,15,19 27:3 53:2,4
 54:12 59:8 63:8 64:21
 65:8,8 66:3,9,10,13
 70:25 71:21 74:14,22
 75:5 76:5,11
 much (29) 6:22,23 11:7
 17:11 30:19 32:12
 33:11 34:8 35:14
 40:17 43:5 45:5 51:22
 52:8,25 54:19 55:3
 56:24 63:24 71:9,23
 74:13,25 75:1 80:9
 85:5 86:3,7 92:14
 must (14) 3:8 4:14 8:2
 13:9,14 14:6 16:10
 30:22 31:5 48:15
 57:5,23 63:1 76:15
 myself (1) 14:25

N

name (2) 2:14,16
 namely (3) 13:25 37:17
 56:23
 names (1) 2:20
 narrative (2) 82:13,23
 narratives (1) 84:4
 narrow (1) 85:6
 national (5) 10:14 15:12
 16:23 17:13 18:6
 nature (2) 50:24 51:22
 near (2) 33:21 34:24
 nearly (1) 58:24
 necessarily (4) 20:18
 51:7 56:8 67:5
 necessary (17) 4:23
 5:14 7:7 17:16 29:14
 31:17 35:12 38:14
 39:16 44:1 52:15 58:6
 61:23 83:14 84:6
 86:15 87:17
 need (19) 4:10 29:3
 33:5 38:9 61:7 62:19
 68:21 69:9 75:2,3 76:9
 77:3 79:12 80:11
 87:15,16 89:13 91:9
 92:8
 needed (3) 11:8 46:23
 69:20
 needs (3) 6:15 52:15
 75:1
 nell (1) 9:2
 never (1) 89:10
 news (1) 60:21
 next (15) 1:18 6:24
 11:9 15:23 22:24
 30:20 33:12 40:8,12
 50:21 57:16 84:14,15
 86:4,11
 nhs (8) 29:17,19,22,25
 30:5,10 80:24,24
 nice (2) 73:24,24
 nicholas (1) 8:19
 nicholls (1) 8:20

night (2) 61:6,18
 nobody (1) 48:5
 nodding (1) 44:7
 none (1) 42:10
 nonetheless (6) 21:23
 49:6 50:5,7 57:1 59:12
 nonsensitive (1) 48:24
 nonservice (1) 50:11
 nor (3) 45:24 65:13
 66:17
 normal (1) 15:7
 north (1) 80:23
 northwest (3) 10:9,16
 11:18
 note (17) 19:19
 36:11,21 37:16,18,25
 39:20 40:4 41:11,24
 42:23 49:25 50:1
 56:4,7 58:19 60:1
 noted (3) 49:15 51:3,6
 11:18
 nothing (8) 2:5 6:5,8
 13:18 18:7 45:11 47:4
 72:19
 notice (1) 63:24
 notices (1) 31:3
 notion (1) 81:4
 november (17) 1:1
 12:23 24:4 29:12
 36:11 37:17 40:12
 53:15 54:13 59:6,16
 60:6 68:19 72:25
 73:11,19,21
 number (13) 1:14 4:14
 18:21
 20:16,19,19,24,25
 21:2,21 40:1 41:3 91:8
 numerous (1) 61:20

O

object (1) 88:14
 objection (3) 4:13
 30:17 36:17
 obligations (1) 12:3
 obliged (1) 56:19
 observation (2) 60:20
 86:9
 observations (4) 6:3
 43:20 45:1,2
 observe (1) 40:16
 observed (1) 60:17
 obtained (1) 69:22
 obvious (5) 38:24 62:14
 69:19 75:8 83:12
 obviously (11) 18:5
 20:21 26:6 27:19
 32:12 35:20 39:23
 52:8 55:12 81:22
 90:10
 occasions (1) 8:15
 occupation (1) 2:16
 occur (2) 32:5 52:12
 occurred (7) 5:5
 11:10,19 18:13 70:13
 72:13 83:6
 occurs (1) 2:5
 oconnor (1) 10:19
 october (6) 12:19,22
 36:25 38:21 40:10
 69:22
 offence (1) 2:18
 offences (1) 2:18
 offer (1) 53:23

office (5) 27:9,17,25
 36:14,24
 officer (3) 69:2,11 82:10
 officers (12) 54:5 58:7
 62:10 64:10 67:14
 68:5 69:8,9,10
 70:4,6,11
 officials (2) 36:24 82:14
 often (4) 46:12 81:18
 83:7,19
 okay (5) 6:22 20:14
 56:16 75:20 86:3
 old (2) 72:12,16
 olivia (2) 9:11,21
 omit (1) 24:20
 omitted (2) 23:21 27:2
 once (7) 4:7 8:12 27:13
 37:5 39:14 40:5 79:19
 ones (1) 80:22
 ongoing (8) 13:6 49:9
 50:19,22 52:7 60:7
 69:7 73:19
 onwards (1) 18:2
 open (8) 5:7 11:21
 13:21 14:18 15:18
 20:9 22:20 87:19
 opening (7) 46:3 49:25
 50:1 56:2,4,7,11
 operate (1) 91:7
 operates (1) 91:17
 operating (1) 61:9
 operational (1) 83:6
 opportunity (3) 22:21
 66:4 70:22
 oppose (1) 88:1
 opposes (1) 30:8
 opposing (1) 87:25
 opposite (2) 14:11
 33:22
 opposition (1) 23:14
 oral (12) 4:19 7:17
 13:6,7 30:21 31:4
 33:25 34:7 44:16
 62:20 78:21,25
 order (33) 2:8,10
 3:9,12,17,20,24
 4:2,4,7 5:11 7:11
 8:13,24 12:13 13:17
 24:13,15 25:21 44:24
 55:13 73:22 74:9 75:3
 77:6 89:24,25
 91:1,7,10,22 92:3,4
 ordering (1) 87:11
 orders (3) 31:3,20 90:8
 organisation (3) 29:1
 59:4 76:18
 organisations (4) 29:6
 38:18 59:2 78:19
 original (1) 55:1
 others (12) 1:23
 4:8,20,23 19:24 22:1,6
 29:9 45:17 80:25 83:4
 88:1
 otherwise (4) 4:16,17
 13:5 52:13
 ought (6) 4:19 8:8
 32:25 47:22 82:25
 88:25
 ourselves (1) 38:2
 outcome (1) 3:5
 outrage (1) 64:18
 outset (4) 48:1 80:13
 90:25 91:5

outstanding (2) 35:5
 61:12
 outward (1) 83:20
 outweighed (1) 15:18
 over (3) 42:12 72:20
 73:23
 overall (1) 46:7
 overarching (4) 29:22
 50:20 68:10,14
 overlap (1) 82:21
 overlaying (1) 74:8
 overnight (1) 57:19
 overview (3) 39:11,16
 68:12
 own (5) 14:20 62:9
 82:22,22 83:1

P

pages (3) 44:18,18,18
 Paige (2) 9:11,21
 paper (1) 37:5
 papers (1) 36:19
 paragraph (5) 23:6,7
 28:25 37:24 82:12
 paragraphs (3) 18:2
 21:16,25
 park (1) 77:23
 parliament (4) 17:6
 26:6 81:7,8
 part (19) 4:1,5 16:4,15
 27:15 42:4 48:16
 52:21 56:7 66:18
 67:2,8 68:11,25
 70:3,19 73:2 75:17
 84:9
 participant (12) 26:2
 28:24 29:5,11,16
 30:8,18 31:23 35:15
 42:3 45:3 78:11
 participants (37) 1:12
 7:2,15 8:12,23 18:11
 19:16 22:14,22 25:4
 28:1,16,21 29:8 37:15
 38:1 39:12 41:1,4,18
 42:18 43:4,9,13 57:13
 59:16 63:7 78:25
 79:5,20,22 80:1,16
 82:23 86:21,25 87:6
 particular (16) 7:3,25
 18:20 20:2 22:8 33:2,3
 35:16 50:20 57:17,18
 58:15 67:10 77:24
 79:15 88:24
 particularised (1) 64:1
 particularly (6) 18:11
 70:24 81:1,2 85:6 87:3
 parties (3) 21:6 65:7
 76:24
 partner (1) 9:17
 partnership (1) 29:24
 parts (3) 28:13 41:13,18
 passage (1) 13:22
 patrick (1) 9:25
 pause (2) 58:17 86:17
 pausing (1) 8:11
 payer (1) 9:23
 pen (1) 32:5
 penny (16) 5:18 6:4,5
 10:22 26:18 45:2
 47:16 48:22,23 51:10
 52:3 53:1 55:11,12
 91:18 92:11

people (10) 1:14 45:8
 48:9 52:1,16,19 77:15
 82:18 89:4,9
 perfectly (5) 56:12
 62:14 77:8,13 78:1
 performance (2) 82:22
 83:1
 perhaps (8) 35:18 47:17
 51:24 55:8 66:20
 67:20 83:12 84:2
 period (6) 11:18 13:3
 67:3,12 72:14 73:17
 persistent (1) 85:7
 person (5) 17:4 20:5
 23:14 29:2 31:10
 personal (1) 59:11
 personnel (1) 67:13
 persons (7) 5:24
 12:8,16 15:8 29:7
 33:15 36:17
 pete (2) 9:13 78:22
 philip (1) 9:12
 phrase (2) 53:10,10
 piece (3) 20:2,20 69:13
 pii (5) 11:17,20,23
 13:10,22
 piper (1) 10:20
 place (19) 1:9 2:23 6:17
 11:12,20 13:20
 17:1,23 21:13 24:15
 31:21 36:22 50:10
 52:15 54:1,11,13
 55:14 88:6
 places (1) 36:4
 plain (2) 24:3 86:23
 plan (3) 40:18 46:12
 86:24
 planning (1) 36:22
 plans (1) 33:17
 play (1) 63:16
 played (2) 29:20 63:15
 please (6) 11:2 32:24
 53:3 71:4 76:2 87:16
 pm (10) 41:10,15,21
 59:6 66:8 89:17,19
 90:18,20 92:17
 poer (2) 8:19 90:21
 pointed (1) 46:11
 points (7) 13:2 21:15
 22:8 37:20 56:22 65:3
 70:23
 police (21) 5:20 9:25
 10:5 13:17 14:4,14
 18:12 19:18 39:4,7
 57:22 60:23 61:17
 63:9,14 64:5,10,22
 65:13,22,24
 policies (1) 68:13
 policing (3) 10:14 11:18
 62:9
 policy (1) 83:6
 portraits (1) 32:6
 position (46) 3:11 8:3
 12:15 24:16 25:20,24
 36:10 37:22 49:19
 62:24 70:3 76:6,21,22
 77:15 78:10,19
 79:6,7,13,18,22 80:4
 81:4,15,20 82:2,17,25
 83:5,10,16,19
 84:4,6,7,20,23
 85:13,15 87:7,12 88:2
 90:15,24 91:23

positions (1) 58:21
 positive (2) 36:22 63:18
 positives (1) 77:1
 possession (6) 37:25
 38:19 49:7 69:8,10
 70:5
 possible (22) 12:12
 14:16,16 15:24 16:17
 18:23 19:20,23 28:15
 37:23 43:5 49:13 51:5
 53:10 54:1 56:25
 57:10 64:19 70:7
 81:20 84:7 87:19
 possibly (3) 47:14 75:19
 80:10
 postpones (1) 2:10
 postponing (3) 3:20 4:4
 24:14
 potential (5) 24:17 39:7
 42:7 65:1 73:1
 potentially (2) 15:15
 76:25
 power (5) 5:8 51:11
 89:22,23 90:23
 practical (1) 52:6
 practicality (1) 87:8
 preceding (1) 41:12
 precisely (3) 23:19 34:6
 90:14
 predominantly (1)
 19:18
 preface (3) 45:7 48:13
 63:18
 prefer (1) 85:22
 preinquest (4) 3:19
 11:11 23:3 24:8
 preinquiry (2) 1:5 93:2
 prejudice (14) 4:11,25
 6:17 24:12,18 26:8
 38:8 42:21 43:14
 45:13 47:14 49:4 57:6
 70:16
 prejudiced (1) 2:2
 prejudicial (1) 26:17
 prejudicing (1) 45:9
 preliminary (1) 74:5
 premature (1) 79:13
 premises (1) 36:1
 preparation (4) 2:6
 25:10 46:7 66:19
 prepare (6) 39:17 52:16
 57:23 60:7,12,15
 prepared (3) 27:18
 39:14 67:4
 preparing (1) 13:5
 presentations (1) 39:14
 presented (3) 27:1 41:2
 69:24
 press (10) 1:23 6:1,11
 90:2,7,11 91:9,20,25
 92:7
 presumably (1) 84:22
 pretrial (1) 49:4
 prevent (17) 3:23,25
 14:4 16:3 17:20
 23:8,24 24:9,20 25:2
 26:14 27:10 54:10
 83:22 91:7,14,17
 previous (2) 8:15 19:6
 previously (2) 8:9 29:7
 principal (2) 37:20
 43:15
 principally (1) 22:16

principle (2) 32:25 87:7
 prior (1) 73:8
 private (2) 17:3 34:16
 probably (5) 22:13
 41:23 77:5 80:2 88:8
 problem (13) 6:12
 26:25 28:7 42:8 55:4,4
 63:2 69:16 73:9,14
 80:18 81:1 83:19
 problems (3) 38:15 41:2
 80:21
 procedural (1) 36:19
 procedure (1) 50:15
 proceed (1) 11:2
 proceeding (1) 48:6
 proceedings (27) 1:3,19
 2:1,8,11,21,22 3:15,17
 4:6,12 5:1,4 6:14
 19:19 31:1,8,10 38:3
 40:10 47:24 48:3
 50:15 67:21 81:21
 91:3,23
 process (27) 14:12
 17:16 26:3 36:18
 38:6,9,12 39:22,25
 48:17,25 49:1 51:4
 52:7 53:16 54:1 67:9
 69:7 72:24 73:22,23
 74:2,15 76:8 78:5
 81:21 83:25
 processing (1) 38:15
 produce (2) 67:25 71:23
 profusely (1) 70:11
 progress (5) 7:3,4 33:15
 35:7 53:7
 progressing (1) 51:24
 prohibiting (1) 91:2
 prohibition (1) 42:17
 promptly (2) 71:4,12
 proofed (1) 73:2
 proper (5) 15:25
 16:17,18,25 17:17
 properly (8) 17:21
 18:12,17 20:15 21:9
 33:9 65:11 90:16
 proportionate (1) 43:19
 proposal (1) 37:5
 propose (3) 37:18 40:3
 86:6
 proposed (2) 41:14
 88:15
 proposes (1) 78:20
 proposing (1) 44:8
 proposition (1) 80:13
 prosecuting (1) 90:13
 prosecution (25) 5:19
 7:25 10:21 28:14 40:7
 42:11,17,25 43:10,17
 45:15,20,23 48:23
 49:8,11,17,17 51:3,21
 55:23 56:25 57:2,8,14
 protect (1) 13:17
 protective (2) 48:4,18
 protocol (2) 28:23
 29:10
 proved (1) 68:15
 provide (8) 22:13
 34:16,18 43:5 46:20
 69:6 74:2 78:19
 provided (31) 3:1,2
 18:17 21:23 34:3
 35:23 37:14
 43:4,6,13,23

44:6,21,22 45:18
 47:3,25 53:14 54:20
 61:18 62:11 67:17
 68:17 69:2,11 72:21
 73:1 74:7 84:8 86:25
 87:10
 provider (1) 73:25
 providers (1) 38:25
 provides (2) 22:12
 29:10
 providing (3) 53:5,7,9
 provision (5) 39:7 68:23
 69:4 88:1 90:1
 provisional (4) 11:15,24
 31:4,24
 provisionally (1) 23:12
 public (37) 5:7 7:3
 12:14,17,20 13:16
 14:1,8 15:15,22
 16:5,14,22 17:10,12
 18:22 19:10 20:3,10
 26:12 30:24 31:17
 45:21,21,23 56:8
 65:23 78:6,11
 81:3,14,18,24 82:3,8
 85:2,14
 publication (1) 25:8
 publicly (3) 14:17 35:1
 64:3
 publish (1) 24:9
 published (8) 23:22,23
 24:1,2,19 27:15 28:23
 64:3
 purpose (3) 7:1 20:2
 74:3
 purposes (6) 11:3 12:21
 25:16 34:10 50:13,16
 pursuant (4) 23:17
 24:13 89:25 91:1
 pursued (1) 68:8
 Q
 queens (14) 5:18,20,22
 9:14
 10:1,3,6,13,17,20,22
 48:19 59:9 78:22
 queries (1) 92:1
 question (9) 23:24 24:9
 44:4,20 49:6 57:13
 23:2,17,21 71:24
 questioning (1) 47:12
 questions (2) 11:25
 25:18
 quicker (1) 74:18
 quickly (3) 68:2 70:7
 71:5
 quite (7) 35:5,12 75:7
 76:25 81:18 88:13
 92:9
 quote (1) 13:23
 R
 radicalisation (1) 39:22
 radio (5) 61:17,19
 62:12,18 73:16
 raise (7) 8:2 18:14 19:4
 27:8,22 54:17 88:22
 raised (9) 5:3 8:4 21:18
 27:24 28:8,12 62:8
 71:16 81:16
 raises (1) 76:25
 rather (1) 52:22

reach (2) 16:17 90:15
 reached (3) 15:23 17:4
 88:24
 react (1) 81:3
 reactive (1) 51:7
 read (5) 12:1 21:16
 24:22 67:5 76:23
 readily (1) 67:1
 ready (2) 36:2 70:3
 real (1) 79:18
 realistic (2) 47:10,12
 reality (1) 67:7
 really (3) 64:22 71:20
 92:5
 reason (7) 13:20 22:5
 42:7 44:8 47:3 61:10
 69:20
 reasonable (4) 21:18
 30:23 57:2 79:21
 reasonably (1) 59:20
 reasons (12) 4:2 17:2
 27:11 41:21 42:6
 43:12 46:21,21,22
 54:21 59:13 71:22
 reassurance (2) 18:18
 22:12
 receive (3) 45:25
 57:14,15
 received (12) 12:7,9
 29:17 49:16 51:9
 59:3,5,9 60:23 61:2
 78:13,16
 recent (4) 7:9 13:2
 37:16 53:13
 recently (1) 62:8
 recognise (6) 11:3,6
 18:25 19:23 31:14
 35:1
 recognised (1) 60:7
 recordings (4) 61:17,22
 62:11 72:21
 recovered (1) 73:12
 redacted (1) 17:9
 redactions (1) 56:11
 redesign (1) 34:9
 reducing (1) 81:25
 refer (6) 3:9 10:5,12
 30:12 65:15 80:23
 reference (22) 4:1,6 5:3
 7:14 18:24
 23:2,17,18,23,23
 24:2,19,20 25:14 26:4
 27:3,14,16 41:6 71:25
 82:16 91:13
 referral (2) 3:25 25:2
 referrals (6) 3:23
 23:9,24 24:10,20
 91:14
 referred (7) 26:14 29:6
 32:3 36:20 37:24
 54:24 80:17
 referring (1) 34:5
 reflect (2) 20:25 90:6
 reflected (1) 20:18
 refute (1) 66:22
 regard (5) 19:3 31:13
 63:3 91:9,21
 regrettable (1) 66:14
 regular (1) 37:13
 reiterate (1) 70:14
 reiterating (1) 53:23
 relate (1) 57:21
 related (6) 18:2,25

19:5,17 81:2,18
 relates (4) 20:17 27:9
 58:2 61:15
 relation (12) 15:10
 20:15 22:4,15 50:19
 52:5 60:13 66:19
 68:19 71:16 87:17
 88:5
 relationship (1) 37:1
 relatively (5) 20:17 21:2
 37:2 74:16 85:21
 released (2) 15:7,11
 relevant (15) 15:5
 19:9,14 37:25 38:19
 39:23 41:6 57:14
 58:7,21 74:11
 82:5,16,22 83:11
 rely (1) 27:16
 remain (2) 31:12 89:4
 remaining (1) 61:3
 remains (4) 24:15,18
 37:22 51:4
 remanded (1) 2:24
 remarks (3) 14:20 56:21
 63:4
 repeat (4) 60:10 61:12
 63:22 65:3
 repeatedly (1) 80:17
 replicate (1) 23:19
 report (14) 14:18 17:10
 39:8,16 64:2,3,7 69:5
 80:23,24,25,25 90:12
 91:21
 reportable (1) 6:16
 reported (3) 5:5 6:19
 14:17
 reporters (1) 30:24
 reporting (26) 1:13,24
 2:10 3:7,21 4:4,10,15
 5:9 6:3,13 8:8 24:14
 27:2 48:2 50:9 55:13
 88:12 89:1,13,23
 91:2,8,11,16,17
 reports (6) 39:4,11,17
 60:16 80:18,22
 represent (2) 32:20
 53:23
 representation (5) 1:11
 3:1 7:8 8:17,24
 representations (1) 4:8
 representative (2) 6:9
 11:4
 representatives (4) 5:21
 10:25 11:6 51:25
 represented (14)
 9:6,13,18,23,25
 10:3,6,9,12,15,16,19,21
 78:17
 representing (1) 54:5
 request (8) 20:22 21:19
 73:23 78:18 82:3,8
 85:14 92:11
 requested (5) 59:1
 61:1,2,5 63:25
 requests (3) 38:19,21
 85:12
 require (3) 26:4 71:13
 87:1
 required (7) 25:18
 58:10,24 59:25 65:4
 67:8,10
 requirement (1) 58:22
 requires (1) 30:22

resolution (1) 11:16
 resolve (1) 80:2
 respect (17) 3:23
 23:9,10,21,21,25
 24:10 27:5 49:3 53:11
 64:17 68:4 72:15
 82:15 89:7 91:6,14
 respectfully (1) 22:10
 respond (7) 21:24 22:2
 61:21 84:14
 85:14,19,23
 responds (2) 47:16 65:8
 response (15) 29:20
 39:5 59:3 60:15
 61:18,25 64:17 66:2,3
 70:3,8 75:22 76:1
 77:15 88:18
 responses (1) 77:10
 responsibility (3) 29:23
 43:15 59:11
 responsible (2) 38:12
 43:19
 rest (2) 24:6 25:25
 restriction (4) 31:2,20
 89:25 91:16
 restrictions (5) 8:8 48:2
 88:12 89:23 92:8
 result (7) 12:16 18:22
 42:15 50:11 61:23
 65:15 73:2
 resulting (1) 15:15
 return (2) 20:11 70:6
 returned (1) 70:9
 reveal (3) 15:21 17:8
 59:20
 revealed (1) 16:14
 review (9) 1:5 3:19
 11:11 23:3 24:8 39:15
 47:11 85:6 93:2
 revisit (1) 27:4
 revisited (1) 47:6
 richard (1) 39:10
 rightly (1) 50:1
 rigorous (6) 15:25
 16:17,25 17:18,22
 21:11
 rise (4) 85:7 90:4,17
 92:15
 risk (12) 1:25 4:11,24
 16:23 18:8 20:5 21:21
 27:14 38:7 42:21
 43:13 47:14
 risks (1) 45:12
 roads (1) 83:15
 robert (1) 10:17
 role (6) 29:20 54:4 61:6
 63:14,16 68:6
 roles (1) 67:11
 room (6) 2:4 45:8 70:15
 79:8 85:25 89:10
 rooms (1) 34:19
 rose (1) 9:9
 round (1) 77:5
 roussos (1) 9:9
 ruled (5) 5:3 11:14
 13:15 23:13 79:14
 rules (3) 15:19,20 30:6
 ruling (10) 6:15 11:22
 12:5 13:10 18:23
 19:10,11 23:15 79:2
 87:11
 rulings (3) 7:6,6 11:15
 rumours (1) 82:6

running (1) 37:2
 rutherford (1) 9:21
 S
 safe (1) 24:18
 saffie (1) 9:9
 salman (10) 1:17 3:23
 16:2 17:7,19 23:10,25
 24:11 39:24 91:15
 same (9) 12:22 17:11
 20:20 30:14 34:6
 46:18 67:23 70:14
 73:3
 sat (1) 69:13
 satisfied (2) 13:24 43:18
 satisfiers (1) 30:5
 saunders (81) 1:6
 6:4,7,9 11:5 14:22
 18:4 20:14 22:1
 26:11,16,20,24 27:13
 28:11,18 30:9,14,16
 32:4,15 33:7 35:8,18
 36:3 43:21,25 44:23
 45:4 47:16 48:8,22
 51:10 52:8 53:3
 54:2,15 55:10,18
 56:2,16,20 63:10 65:6
 66:5,9,12 70:21 71:1
 74:12,15,23 75:20,25
 76:9,12,22 77:20 78:1
 80:5,11 84:17,19,22
 85:18 86:3,7,15
 87:11,15 88:4,11,14
 89:2,8,15 90:2,7,17
 91:24 92:13
 save (5) 2:11 23:20
 59:4 70:19 91:3
 saying (8) 45:7 48:13
 51:12 52:23 55:5
 63:18 64:25 71:2
 scale (2) 63:3 73:14
 scene (1) 67:13
 schedule (1) 36:16
 scheduled (2) 68:20
 86:12
 scope (11) 3:21 11:14
 15:6 23:6,11,19
 24:2,15 25:1 26:10
 27:11
 scrutinise (1) 22:22
 scrutiny (2) 13:18 14:16
 search (2) 73:11,18
 second (10) 2:16 5:19
 7:18 13:10 23:3,6
 28:19 36:7 61:15 72:6
 secondly (7) 2:8 22:8
 25:24 42:10 46:10
 82:21 83:17
 secretary (16) 10:11
 11:17 12:12,16,19,23
 23:16 24:16,23
 26:5,23 27:1,4,17,20
 35:2
 secretaries (2) 25:23
 26:9
 section (14) 2:9 3:20
 5:4,10 12:1,2,24 19:11
 23:17 24:13 30:22
 31:9 89:23 91:1
 sections (1) 25:16
 secure (1) 30:23
 secured (1) 34:14

security (11) 13:17
 14:3,15 15:12 16:23
 17:5,13 18:6,11 22:19
 39:9
 see (9) 20:10 21:13
 30:25 35:17 48:10
 70:7 71:18 83:20
 92:16
 seek (4) 18:20 39:1
 47:11,15
 seeking (2) 45:22 48:14
 seeks (1) 29:19
 seem (1) 60:2
 seemed (1) 21:17
 seems (8) 4:9 8:13,14
 44:25 57:1 63:4 71:5
 79:17
 seen (5) 16:24 20:16
 39:13 79:23 89:10
 sending (1) 44:3
 senior (2) 64:9 68:5
 sense (2) 5:13 50:14
 sensible (7) 8:15 22:11
 44:24 47:5 48:20
 56:11 63:5
 sensitive (2) 31:16 32:2
 sensitivities (1) 22:7
 sensitivity (8) 32:13
 33:3 38:6 42:16 43:15
 47:23 48:16 50:8
 sent (1) 64:16
 separate (1) 30:11
 september (6) 11:22,23
 12:9,17 58:15 65:4
 sequence (1) 39:13
 series (2) 1:9 68:6
 serious (1) 64:8
 seriously (1) 2:2
 serve (1) 86:13
 served (6) 55:9 78:10
 81:19 87:2,3,9
 server (8)
 72:9,11,16,16,19 73:9
 74:1,11
 service (21) 5:19
 10:9,21 13:18 14:3
 18:11 22:19 28:14
 30:10 43:17 48:24
 49:8,11,17,23 51:3,21
 57:2,8 58:14 60:6
 services (2) 14:15 34:20
 session (3) 11:22 13:12
 22:16
 set (31) 11:16 12:1 13:3
 23:5,7,16 24:6
 25:16,20,24,25 37:18
 38:2 40:4 41:1,2
 49:21,22 57:20,24
 59:7 60:1 69:16 75:23
 77:18 82:25 83:5
 85:15,16 86:8 91:4
 sets (4) 23:4 41:25
 82:11,17
 setting (3) 53:16 60:5
 78:11
 setup (1) 12:21
 seven (2) 58:8,23
 seventh (1) 3:1
 several (2) 56:3 64:9
 shall (2) 29:3 77:18
 share (2) 2:4 79:7
 sheer (1) 70:13
 shoes (1) 48:14

short (19) 4:7,21 6:14
 8:7 21:15 28:4 29:19
 30:20 31:19 36:8
 43:10 56:16,21 66:7
 75:24 80:4 88:25
 89:18 90:19
 shortcircuiting (1) 77:3
 shortcomings (1) 35:22
 shorten (1) 81:21
 shortens (1) 83:25
 shorthand (1) 12:14
 shortly (4) 40:2 46:13
 80:3,9
 should (52) 2:6 3:22
 4:4,21 8:10 12:11,13
 15:11 16:14 22:9,14
 23:9,11,21,24
 24:10,24 25:4 26:13
 27:10 29:11 30:18
 35:18 39:1 40:20,21
 41:19,21 42:1,4,5,10
 49:15 51:6 55:9 56:14
 57:11 58:13 60:3 62:3
 78:10 82:10 83:5,8
 84:8 87:8,12 89:13,25
 90:12 91:11,14
 shouldnt (3) 6:18 20:23
 83:8
 shown (2) 15:4 38:11
 sick (1) 69:3
 side (1) 54:4
 sides (4) 32:2 79:11
 86:2 88:3
 significance (2) 49:19
 62:12
 significant (2) 50:7,9
 silent (1) 89:10
 simultaneous (1) 31:1
 since (10) 7:4 11:10,19
 15:1 34:8 38:21 60:20
 62:23 73:19 83:6
 sio (1) 53:7
 sir (182) 1:6,7 2:4
 3:11,20 4:3 5:8,16
 6:4,7,8,9,23 7:5,25 9:5
 10:24 11:5,7,12,21
 12:15,25 13:8,22
 14:5,19,22 18:4 20:14
 21:14,20 22:1,5,24
 23:4,15 24:25
 26:3,11,16,20,21,24
 27:13 28:11,18,19
 29:17
 30:3,7,9,14,16,19,22
 31:13,22
 32:4,15,17,19 33:7
 34:14,22
 35:8,14,18,24
 36:3,7,24 37:9,22
 38:15 39:9 41:20
 43:20,21,25 44:20,23
 45:4,14 47:16
 48:8,22,23 49:18
 51:10 52:3,8
 53:1,2,3,5,22
 54:2,12,15 55:10,18
 56:2,16,20 57:16
 59:7,17 60:5,17 61:15
 62:1,21 63:1,10 65:6
 66:3,5,9,10,12,13
 67:2,19 69:25
 70:3,12,14,21 71:1,21
 72:20 73:13

74:4,12,15,23
 75:5,20,25
 76:5,9,12,15,22
 77:18,20 78:1,8,13,24
 79:6,12,24 80:5,11
 84:17,19,22 85:18
 86:3,7,15 87:11,15
 88:4,11,14,23
 89:2,7,8,12,15,20
 90:2,4,7,14,17 91:24
 92:13
 sit (2) 27:23 55:21
 site (2) 44:14,18
 sitting (3) 11:12
 67:11,23
 six (6) 38:20 40:13
 60:22 61:3 69:1 70:8
 sixth (1) 2:24
 slater (2) 9:8 32:18
 slightly (1) 46:18
 small (6) 21:3 26:21
 27:7,21 49:2 52:21
 smg (1) 10:19
 smith (1) 10:17
 smooth (2) 54:6,19
 smoothly (1) 37:3
 smr (2) 30:11,15
 social (3) 3:8 4:15 29:24
 solicitor (16) 8:21 10:8
 33:14 34:4 35:25
 36:9,23 37:14 39:2,19
 41:10,16 58:4,5,11,18
 solicitors (5) 2:20
 9:8,15 53:14 54:13
 something (8) 20:14
 26:13 49:18 52:10
 63:23 74:6 81:11 90:6
 sometimes (5) 38:24
 51:7 54:6 82:5,5
 soon (4) 12:12 53:25
 57:10 75:18
 sooner (1) 43:4
 sophie (1) 8:19
 sorrell (1) 9:12
 sort (4) 14:2 21:7,8 77:6
 sought (5) 38:14 45:18
 58:16 61:16 66:15
 space (5) 33:23
 34:2,9,14,22
 sparse (1) 55:2
 speaking (1) 39:25
 specific (6) 42:15,19
 69:16,17 91:8,10
 specifics (1) 66:25
 spend (1) 56:3
 spot (1) 39:1
 staff (1) 67:14
 staffs (1) 80:24
 stage (20) 5:12 6:5,20
 16:6 32:24 34:4 37:4
 38:2 40:5,14 46:24
 47:11 49:4 51:12
 56:25 57:3 60:25
 71:10 72:17 73:15
 stand (1) 53:22
 start (23) 1:17 8:2 13:8
 34:12 40:11,19 43:1
 44:2 46:14 52:9,13,14
 53:18 57:25 60:19
 62:21 65:17 66:20
 70:15,16,17 76:18
 80:3
 started (2) 56:14 73:11

starting (2) 34:13 75:10
 statement (21)
 49:16,24 50:12
 55:7,9,15 58:2
 68:10,11,15,21,23
 69:6 82:10,11,25
 83:5,10 84:8 85:15
 91:19
 statements (64) 8:3
 55:19
 58:3,6,9,9,13,14,15,23
 59:1,3,5,18,23,25
 60:6,8,14,22
 61:1,4,5,12 64:24
 66:11,21 67:1,4,8,9,19
 68:9 69:1,10,18
 70:5,12,18,22
 71:19,23 72:1
 76:21,23 77:15
 78:10,19
 79:16,16,18,22
 81:4,15 82:2 83:16
 84:4,7,20,24 85:13
 87:7,12 88:2
 status (4) 28:24
 29:11,16 30:18
 statutory (5) 11:25
 12:14 25:17 85:9,11
 stenographers (1) 65:6
 step (3) 11:8 48:14
 67:15
 steps (2) 4:9 30:23
 sti (4) 36:25 61:5,23,24
 still (10) 22:18 32:1
 34:23 36:14 38:3
 56:25 61:11 70:2,17
 74:12
 stole (1) 14:9
 store (1) 72:11
 stored (1) 74:11
 straightforward (1)
 48:20
 strategic (1) 68:13
 stream (1) 34:19
 streaming (3) 7:15
 30:21 32:25
 stress (1) 73:15
 strict (3) 15:19 47:13
 55:13
 strong (2) 5:15 13:9
 strongest (2) 64:4,8
 structure (1) 68:12
 subheading (2) 23:1
 40:8
 subject (18) 6:5 14:15
 31:2,18 33:17 37:9,23
 44:14,24 47:1,2,13
 50:3,5,6 76:20 86:2
 91:20
 submit (6) 4:3 18:16
 47:22 63:1 79:22,24
 submitted (1) 29:12
 substantial (5) 1:25
 4:25 5:5 54:25 62:6
 successful (1) 15:14
 successfully (1) 16:22
 sue (1) 35:3
 suggest (6) 3:9 4:13
 21:24 62:25 86:10
 89:12
 suggested (3) 4:13 22:5
 59:20
 suggestion (3) 22:8

66:18,22
 suggestions (1) 68:1
 suitable (1) 35:9
 summarise (1) 37:20
 summarised (1) 40:3
 summary (6) 2:18 7:9
 20:8 41:11 45:20 46:3
 summer (1) 11:10
 supplied (1) 58:20
 supply (2) 44:8 58:19
 support (9) 31:25
 32:1,14 34:20 53:6,24
 60:9,11 81:9
 supported (1) 8:20
 sure (9) 26:24 52:16
 56:17 65:25 72:2
 76:3,24 89:7 90:9
 survivability (1) 39:18
 suspect (3) 27:7 41:23
 71:10
 suspend (1) 37:5
 suspended (1) 36:15
 suspension (4) 7:19
 33:12 36:8,18
 suspicion (1) 13:13
 suter (6) 8:21 36:12
 42:22 44:7 54:19 68:7
 54:22
 swiftly (1) 70:9
 sympathetic (1) 32:10
 system (3) 72:12 73:11
 77:1
 systems (1) 73:25

T

taken (11) 4:10 11:8
 16:11 27:10 43:23
 47:5,12 52:15 64:23
 71:22 81:13
 takes (2) 54:10 75:10
 taking (3) 8:7 32:1
 84:11
 tale (1) 63:21
 talk (2) 43:25 52:19
 talking (3) 78:6 81:5
 82:7
 task (4) 43:19 62:6
 68:16 70:13
 team (29) 7:2 8:21 9:14
 13:4 15:4 29:17 35:25
 38:17 41:9 49:2,7
 61:16 62:7 66:23
 67:17 68:1 69:3,21
 70:22,24 71:2
 72:3,21,23,23 73:4
 74:25 75:18 78:9
 teams (3) 5:23 37:25
 75:2
 technicians (1) 72:10
 telecom (1) 73:24
 tempting (1) 90:21
 ten (1) 69:1
 term (1) 32:19
 terms (31) 4:1,5 5:15
 7:13 18:24
 23:2,16,18,23
 24:2,19,23 25:14 26:4
 27:2,14,15 33:16 41:6
 55:5 64:8 67:20 68:8
 80:7,23 81:24
 82:15,18 85:16
 91:12,22

terrorists (3) 14:1,8
 15:14
 test (1) 5:3
 thank (49)
 6:7,8,22,22,23 11:7
 14:22 17:24 20:13
 21:14 28:17,19
 30:16,19 32:12,15,17
 33:10,11 35:14 44:23
 45:5,5 48:21,22,22
 52:25 53:1 54:15
 56:20 63:10 65:6
 66:5,10,12 70:21
 75:20 76:13 80:5,9,12
 85:18 86:3,7 88:4
 89:11 90:3,6 92:13
 thatll (1) 46:17
 thats (22) 11:7 20:7
 27:8 30:12 33:5 41:25
 44:4 47:10,15 54:12
 55:6 57:17 63:18
 68:12 69:6 71:15,20
 78:5 84:25 88:17
 92:13,14
 themselves (2) 52:16
 54:10
 theory (1) 45:25
 thereafter (1) 12:7
 thereby (2) 20:4 82:13
 therefore (8) 12:2 16:15
 47:5 66:19 77:2 81:4
 84:5 85:2
 theres (7) 27:14 30:17
 35:22 45:11 62:5 86:1
 88:23
 theyre (4) 18:1 67:10
 71:19 76:6
 theyve (2) 8:12 77:16
 thing (1) 57:10
 thinks (2) 42:4 86:18
 third (4) 2:18 5:21 37:9
 83:24
 thirdly (4) 3:19 7:21
 22:12 26:1
 though (1) 22:21
 thought (7) 27:21 36:6
 42:10 44:5,17 64:15
 78:5
 threatens (1) 60:19
 three (10) 21:15 30:1
 59:24 61:11 64:2,13
 69:9 70:4 74:2,9
 through (7) 14:12
 46:15,17 47:4 63:2
 85:10 88:12
 throughout (1) 13:3
 thrust (2) 12:10,11
 tim (1) 8:21
 time (29) 4:7 8:11
 17:11 24:18 29:13
 33:1,8 34:11 40:12,17
 43:11 44:15 48:12
 54:3,3 55:20 58:21
 59:9 60:24 62:25 64:2
 65:11 71:22 72:18
 73:6 77:16,23 85:22
 92:19
 timelimited (1) 5:11
 timescale (1) 40:21
 timetable (10) 11:16
 49:21,23,23 74:24
 79:4 86:6,8,12 88:15
 today (20) 3:13,14

U

4:11,19 5:23 7:7 10:25
 33:6 52:24
 55:6,10,12,15 69:12
 71:20 79:13 84:3
 90:12,25 91:5
 todays (3) 49:15 55:14
 92:4
 together (7) 8:19 10:7
 12:1 29:25 41:13 48:4
 52:19
 told (6) 37:7 55:10
 59:24 75:25 87:4 90:6
 too (3) 37:8 55:18 77:6
 took (5) 1:9 11:12,20
 36:22 54:13
 topic (18) 5:17 7:18,20
 8:3,11,13 22:25 26:2
 28:21 30:7,20 36:9
 37:9 44:25 57:16 63:8
 76:20 77:19
 topics (4) 8:10 18:24
 33:3 58:12
 total (2) 18:21 59:2
 traditional (1) 56:3
 transcribe (1) 69:21
 transcribed (6) 41:19
 42:5 61:22 62:3,19
 75:1
 transcribing (1) 62:5
 transcript (2) 44:9
 75:10
 transcription (3) 72:24
 74:15 75:2
 transcripts (12)
 41:5,14,16 42:1,2
 43:25 44:1 62:17
 69:20,23 75:8,12
 transmission (1) 31:1
 transmissions (5) 61:19
 62:1,6,13,18
 transport (1) 9:25
 treated (1) 29:25
 trial (55) 1:16,20 2:7
 6:17 7:24 24:12
 26:7,17 38:8
 40:6,11,14,18,23
 41:5,8 42:12,19,24
 43:7,14,23 44:10
 45:9,13,21 46:11
 47:15 48:2,6,11
 49:5,15,20,20,22
 50:4,8,9,19,21 51:13
 52:6,11
 53:11,14,19,21,25
 56:14 57:5,6,23 60:12
 88:7
 trials (2) 46:12 48:10
 trialsensitive (1) 40:25
 tron (1) 9:12
 trouble (1) 35:12
 true (3) 18:14 62:24
 83:14
 truly (1) 83:16
 trust (1) 29:25
 truth (3) 13:19 82:11
 83:21
 try (4) 35:13 52:19 71:6
 92:1
 trying (1) 72:2
 turn (8) 6:24 11:9 14:19
 22:24 33:12 40:7
 70:10 72:6
 turning (2) 64:14 66:25

used (5) 45:16 48:24
55:24 56:7 69:24
utilised (2) 61:21 82:2
utility (2) 81:16 83:12
utmost (1) 62:12
utterly (1) 66:22

V

vacated (1) 49:20
value (1) 79:18
various (3) 52:5 75:8
80:25
venue (7) 7:17 31:11
33:13,16,19 35:3,9
verdicts (1) 40:24
via (2) 31:6 73:24
views (2) 62:14 74:20
visited (1) 35:25
vital (2) 74:19,23
volume (1) 70:13
voluntarily (2) 81:15
82:3
volunteering (1) 35:17

W

wait (2) 55:18 65:18
wants (1) 77:24
ward (1) 10:18
warnock (1) 10:3
warnocks (1) 81:7
wasnt (4) 45:22,22,24
54:17
watched (1) 31:6
wave (2) 39:11,15
way (15) 13:15 17:17,20
21:6 26:21 36:10
42:22 50:22 59:7 63:5
67:23 75:9 77:14,23
81:2
weatherby (53) 5:22 8:4
9:13 17:25 18:1,5 24:4
25:15,24 26:20,21,25
27:21 28:17 32:1,4,12
37:7 40:16,23 45:1,4,5
48:20 52:22 54:16,17
55:16,21 56:1,10,19
63:6,10,11 66:14
75:22,23 76:24
77:9,22 78:9,22 79:10
80:6,9,12 84:18,21,25
86:13,18 88:17
weatherbys (5) 20:22
21:17,25 56:23 86:20
website (1) 31:7
wed (1) 56:12
wedded (1) 52:8
wednesday (4) 41:15
42:2 44:6 78:15
week (4) 29:13
41:12,22 44:7
weeks (4) 40:13 43:1
64:2,13
weightmans (1) 10:10
welch (1) 9:18
welcome (2) 33:1 55:3
wellknown (2) 80:21,22
wendy (1) 9:2
went (1) 11:23
werent (2) 54:20 73:5
westminster (1) 16:8
weve (14) 4:13 6:13 8:9
10:25 13:3 24:7 40:5

48:16 74:16 75:11
76:4,23 87:4 90:16
whatever (1) 53:24
whats (6) 28:3 51:23
65:10 71:18 78:4 90:2
whereas (1) 55:3
whichever (2) 19:16
27:17
whilst (5) 19:4 25:11
36:13 57:21 60:1
whoever (1) 31:7
whole (2) 26:11 77:12
wholly (1) 44:11
whom (4) 43:17 49:7
61:4 67:9
whos (1) 45:1
widely (1) 29:18
wider (2) 7:2 84:6
wish (18) 2:5 5:24
14:13 22:1,3 35:16
41:20 43:9 44:4 47:17
53:6,17 65:6,7,14 79:1
85:19 88:22
wished (2) 31:7 54:13
wishes (5) 6:1 26:2
31:10,23,24
withheld (2) 18:22
46:23
withholding (1) 20:2
witness (6) 22:18 58:6
61:7 69:4,6 73:2
witnesses (5) 22:23
31:15 66:23 67:24,25
wont (1) 30:14
work (21) 13:4 30:12
33:17,22 34:1,8 35:1,4
36:4 38:10,17 43:2
59:18,22 60:3,7,8,11
61:24 62:5 69:13
worked (1) 43:17
working (6) 37:1 38:3
57:23 69:5 72:11 75:2
works (1) 34:11
world (1) 69:25
wouldnt (2) 28:7 55:1
write (1) 12:11
writing (9) 8:4 24:3
29:12 41:20 42:5 45:2
77:10 80:1 85:23
written (11) 18:2,15
29:4 40:17 46:19
51:24 60:17 67:18
78:8 82:12 84:12
wrong (1) 90:22
wrote (2) 12:16 58:11

Y

year (9) 1:18 11:11 23:5
40:12 50:21 58:5 62:1
72:22,25
yesterday (3) 60:18
69:2 70:8
yet (6) 36:15 39:13
50:11,12 70:23 76:6
youre (4) 51:18
52:23,24 88:16
yourselves (1) 85:22
youve (3) 4:7 28:12
78:8

0

0045 (1) 62:2

1

1 (7) 36:16 37:13 62:4
68:11 70:3,19 93:2
10 (2) 86:22,23
100 (1) 90:20
1000 (1) 1:2
1024 (1) 1:4
103 (1) 92:17
10minute (1) 66:1
11 (5) 18:2 21:16 32:20
36:11 37:17
1157 (1) 66:6
12 (5) 58:15 59:2 61:1
68:4 69:1
1210 (1) 66:8
1245 (1) 89:17
1255 (1) 89:19
1256 (1) 90:18
13 (10) 1:18 11:23
40:12 49:21 52:7
58:15 65:4
86:14,18,20
14 (4) 21:24 22:6 53:15
54:13
15 (10) 21:17 24:4
33:14 59:6 60:6 69:22
72:25 73:11,19,21
16 (1) 23:5
17 (1) 37:24
18 (4) 12:9 30:22 31:9
59:16
19 (3) 19:11 82:12
89:23
1996 (1) 50:16

2

2 (8) 11:13 12:3 61:25
68:25 73:20 74:7
75:25 76:2
20 (2) 29:12 38:1
2005 (1) 89:24
2009 (3) 12:1 25:17
36:16
2016 (1) 72:10
2017 (3) 14:10 72:10,18
2019 (1) 1:1
2020 (1) 92:18
21 (2) 23:7 40:15
22 (9) 1:1 12:19,22
14:9,10 16:1 40:10
62:2 72:18
2215 (1) 62:2
23 (3) 12:9 62:2,4
2330 (1) 72:17
24 (1) 58:4
27 (3) 12:17 86:22,24
28 (6) 23:6,12 86:12
88:6 92:16,18
29 (5) 3:24 11:11 23:14
45:14 68:19

3

3 (3) 5:9 58:19 62:4

4

4 (5) 38:21 41:10,15,21
59:6
404 (1) 12:24
42 (6) 2:9 3:20 5:4,10
24:13 91:1

5

5 (10) 12:23 23:17 29:3
58:11,17 59:24 60:1
63:24 64:1 68:12
51 (2) 12:1 25:16
52 (3) 12:2 25:16 30:5
550 (3) 61:19 69:21
72:20

6

6 (17) 11:22 13:8 23:7
28:25 34:12 40:15
52:9 57:25 60:19
61:14 62:22 65:17
68:22,24 70:4,20 80:3

7

75 (3) 73:17 74:6 75:9