

# OPUS 2

## INTERNATIONAL

Manchester Arena Inquiry PIR

Day 1

January 28, 2020

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1 Tuesday, 28 January 2020  
 2 (10.00 am)  
 3 (Proceedings delayed)  
 4 (10.21 am)  
 5 Housekeeping  
 6 SIR JOHN SAUNDERS: Good morning. I'm sorry for the slight  
 7 delay. There have been travel problems which people  
 8 had, so we waited until as many people as can get here  
 9 are here.  
 10 Mr Penny, are you able to hear me?  
 11 MR PENNY: Yes, I am, sir.  
 12 SIR JOHN SAUNDERS: Thank you very much.  
 13 I want to say something before I ask Mr Greaney to  
 14 open this hearing to you.  
 15 First of all, I want to say something about  
 16 reporting restrictions. The criminal trial of  
 17 Hashem Abedi is imminent and there were legal arguments  
 18 yesterday at the Old Bailey.  
 19 It is absolutely vital that nothing said here is  
 20 reported that might prejudice that trial. There are  
 21 reporting restrictions in place at the trial which must  
 22 be complied with.  
 23 Can I make it clear that that reporting applies not  
 24 just to the press but to people putting things out on  
 25 social media. So I wish to ensure that that Crown Court

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1 order is followed. So please, no reporting, which  
 2 includes tweeting, until we've had a chance to consider  
 3 what will breach the order and what won't. I will  
 4 of course give the press the opportunity to make  
 5 submissions to me about that at the appropriate time.  
 6 One of the matters we have to deal with today is  
 7 whether we can start the inquiry at the beginning of  
 8 April, as we have always intended, or whether it will  
 9 have to be adjourned. I have no desire to adjourn the  
 10 start date. If we do have to adjourn the start date, it  
 11 will be solely because of delays to the criminal trial.  
 12 The progress of the criminal trial is entirely  
 13 outside my control. Everyone will recall that after the  
 14 arrest and extradition of Hashem Abedi and the start of  
 15 proceedings in this country, it was accepted by everyone  
 16 that we must do nothing in the inquest which might  
 17 prejudice that trial.  
 18 As I explained at the time, we might have had to  
 19 stop all preparations for the inquest until the trial  
 20 was over if it had been felt that by continuing we would  
 21 risk prejudice to the trial.  
 22 However, I wanted to continue the progress of the  
 23 inquest as far as possible and the Crown Prosecution  
 24 Service were prepared to agree that we could continue  
 25 subject to their right to stop disclosure of some

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1 documents until the end of the trial if there was a risk  
 2 that earlier disclosure might affect the fairness of the  
 3 trial.  
 4 The Crown Prosecution Service have a much closer  
 5 knowledge of the trial and what would potentially  
 6 prejudice it than I have, so I have been very concerned  
 7 that we as an inquiry should not do anything that could  
 8 prejudice the trial and I know that is important to  
 9 everyone who's here and everyone is in agreement with  
 10 that.  
 11 When counsel to the inquiry, with my agreement, sent  
 12 round a note before this hearing, indicating the risk to  
 13 the start date arising from the delays to the trial and  
 14 inviting submissions on the various possible options,  
 15 there was unsurprisingly frustration at the possibility  
 16 of a delay and a desire to know more about the reasons  
 17 for it.  
 18 Both the Crown Prosecution Service and Greater  
 19 Manchester Police were keen to give as full a response  
 20 to those enquiries as possible, which they then sent to  
 21 me. The adjournments had been made by order of the  
 22 trial judge, who had heard argument as to why they were  
 23 necessary. Those arguments and those proceedings were  
 24 subject to reporting restrictions. I have serious  
 25 concerns that by sending out the response that the Crown

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1 Prosecution Service had sent to me, I would be breaching  
 2 the reporting restrictions, which I was not prepared to  
 3 do.  
 4 Breaching those reporting restrictions could have  
 5 had a serious impact upon the trial.  
 6 I therefore asked the Crown Prosecution Service to  
 7 think again in light of my concerns about what I could  
 8 properly put out. The result was the final response  
 9 that you have, from which there were some redactions  
 10 made because of my concerns about the possible breaches  
 11 of the reporting restrictions.  
 12 It is not for me to decide what has caused the  
 13 delays to the criminal trial. That is a matter for the  
 14 trial judge to decide if he considers it appropriate and  
 15 relevant to do so. I have not made those enquiries, nor  
 16 do I intend to do so.  
 17 What I can say is, as far as I know -- and I have  
 18 limited information -- there is nothing that the Crown  
 19 Prosecution Service and the Greater Manchester Police  
 20 have done which has caused delay to the trial.  
 21 Valid points have properly been made by the  
 22 participants in this inquiry as to how we might speed  
 23 the process up and limit the amount of delay. Those are  
 24 helpful things which will be considered and have been  
 25 considered by the Crown Prosecution Service, and can

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1 hopefully be implemented. But the fact that you do not  
2 have a detailed response on paper coming via me from  
3 the Crown Prosecution Service is due to my concern,  
4 which I think is a proper concern, that I would be  
5 breaching the reporting restrictions by publishing it  
6 in that way.

7 So having said that, Mr Greaney.  
8 Submissions on start date

9 MR GREANEY: Sir, thank you.

10 This is the second preliminary hearing in the  
11 Manchester Arena Inquiry. An agenda has been circulated  
12 for this hearing. It identifies 10 issues that arise  
13 for consideration today and those are as follows.

- 14 1. Reporting restrictions .
- 15 2. As you have said, sir, the start date for the
- 16 inquiry oral evidence hearings. They are, as everyone
- 17 knows, due to start on 6 April, but as you've indicated
- 18 in your introductory remarks, a decision must be made
- 19 today on whether that is possible in light of
- 20 developments in the trial of Hashem Abedi.

21 Mr Penny, leading counsel for the prosecution in the  
22 trial, appears today by video link on behalf of  
23 the Crown Prosecution Service to assist in relation to  
24 this second issue of start date if that is necessary.  
25 Everyone will understand that he has pressing matters to

1 attend to in connection with the trial and his role in  
2 this hearing will need to be concluded, if possible, by  
3 11 o'clock at the latest .

4 Issue 3 is the proposal of the inquiry legal team  
5 for the distribution of transcripts of the trial of  
6 Hashem Abedi. This is a very short topic and simply  
7 involves the provision of information to all core  
8 participants by CTI.

9 Issue 4 is position statements. Sir, we as CTI have  
10 a strong view about what ought to be done in this  
11 regard. We recognise that it will not please everyone,  
12 but ultimately, however, the issue is what you, sir, as  
13 chairman consider necessary or desirable to enable you  
14 to conduct what we know will be a full and thorough  
15 inquiry.

16 Issue 5 was identified as the application of the  
17 Fire Officers' Association and five named current or  
18 retired fire officers for core participant status. Sir,  
19 extensive submissions on that issue have been exchanged  
20 between the relevant core participants and CTI, but  
21 I can tell you at this stage it is, as we understand it,  
22 unlikely to be necessary to hear argument on that issue  
23 today or for you to make a ruling.

24 Issue 6 is the issue of the hearing timetable and  
25 the structure for the oral evidence hearings, including

1 the likely dates of the summer break and the days of  
2 sitting each week and of the oral evidence hearings.

3 7. We will provide an update on disclosure and on  
4 the position in relation to experts.

5 8. We will provide an update on the venue for the  
6 oral evidence hearings and the accommodation for the  
7 bereaved families .

8 9. We will deal with the live streaming of the  
9 inquiry oral evidence hearings. Although, may we say,  
10 that is not a topic we propose to address in detail at  
11 this hearing because in our view it is better deferred  
12 until the issue of restriction orders has been dealt  
13 with, which we anticipate being dealt with at the next  
14 hearing on 28 February.

15 Tenth and finally, we will deal with the issue of  
16 pen portraits and how that topic is to be approached  
17 at the oral evidence hearings.

18 Sir, as we did at the first preliminary hearing and  
19 in the hearings that occurred when the proceedings were  
20 coronial, we'll deal with those topics one at a time,  
21 inviting submissions from core participants in what  
22 seems to us to be the most sensible order.

23 Finally, before we turn to the topics, there is  
24 a list of recognised legal representatives at divider 39  
25 of the hearing bundle. We don't propose to read each

1 name out because they are largely the same as at all  
2 earlier hearings.

3 Then to the issues on the agenda, and first of all  
4 the topic of reporting about which you have said, sir,  
5 yourself something already.

6 The criminal proceedings against Hashem Abedi are,  
7 as everybody knows, live within the meaning of the  
8 Contempt of Court Act 1981. The trial was due to start  
9 yesterday and, as we understand it, the swearing in of  
10 the jury for the trial is imminent. It follows from  
11 that that the criminal proceedings are at a particularly  
12 sensitive stage and the press and others with an  
13 interest in the trial, including all members of the  
14 public, will be aware of the critical importance of not  
15 reporting anything that may create a substantial risk to  
16 the course of justice in the criminal proceedings  
17 against Hashem Abedi will be seriously impeded or  
18 prejudiced. We make plain that in our judgement to do  
19 so would be a most serious contempt of court. That,  
20 of course, arises quite separately from the question of  
21 the record made in the Crown Court pursuant to  
22 section 4(2) of the Act.

23 In those criminal proceedings an order has been made  
24 under section 4(2) postponing the reporting of any  
25 aspect of those proceedings, save for certain identified

1 matters.

2 So important is this issue that we'll set out what

3 those individual matters are. They are: the identity of

4 the court and the name of the judge; the name, age, home

5 address and occupation of the accused, Hashem Abedi; the

6 offences or a summary of them with which the accused is

7 charged; the names of counsel and solicitors engaged in

8 those proceedings; where the proceedings are adjourned,

9 as they have been, the date and place to which they're

10 adjourned; the fact that Hashem Abedi has been remanded

11 into custody; the fact that representation has been

12 provided to him under the applicable legislation ; and

13 the fact that an application was made by the Crown under

14 section 22 of the Counter Terrorism Act 2008 for

15 Hashem Abedi to be interviewed, but not the details of

16 the section 22 application itself or the outcome of it .

17 The position of CTI is that this order, made by

18 Mr Justice Sweeney some time ago now, may well be

19 capable of capturing anything said during the hearings

20 in the inquiry .

21 Accordingly, if anything is said today about the

22 proceedings against Hashem Abedi beyond the matters that

23 we have just identified , as will in our judgement

24 inevitably occur, the order in the criminal proceedings

25 should bite .

1 You will recall that we have routinely made that

2 point and indeed it was also made by Mr Penny in the

3 proceedings before Mr Justice Baker yesterday.

4 There are two additional points that need to be made

5 about reporting before we move on to the issue of start

6 date. First , at the last hearing, or at any rate at

7 a hearing in the proceedings, you have made your own

8 order under section 4(2) of the Contempt of Court Act.

9 That order was made in fact when we had the form of

10 inquests.

11 That order postponed any reporting of the fact that

12 the issue of whether there should have been Prevent

13 referrals in respect of Salman Abedi's family formed

14 part of the terms of reference for the inquiry as they

15 now are, and sir , in our judgement, that order remains

16 in force and will do so until further order.

17 Secondly, the question will arise today of whether

18 anything said today in the course of this hearing can be

19 reported. Given the stage the criminal proceedings

20 against Hashem Abedi have reached, we consider it likely

21 that, sir , you will judge that reporting of most of what

22 is said today would amount to be a contempt or be caught

23 by the section 4(2) order in the criminal proceedings.

24 The time for you to make that decision is at the

25 conclusion of this hearing. Accordingly, as you, sir ,

1 have indicated already, so as to avoid a situation in

2 which material that ought to be caught by an order or

3 which would amount to a contempt is published before you

4 can make that plain , there must be no live reporting

5 whether by Twitter or other social media or otherwise,

6 during the course of this hearing until further order by

7 you.

8 What we intend is that at the conclusion of oral

9 submissions there should be short break during which, in

10 consultation with the core participants and media,

11 we will give consideration as to whether anything that

12 has been said, if reported, would amount to a contempt

13 and/or be caught by the order in the criminal

14 proceedings.

15 Sir , that is what we intend to say about the

16 important issue of reporting. We don't propose to

17 invite submissions at this stage from any core

18 participant , but if anyone wishes to say anything about

19 it , they should indicate .

20 (Pause)

21 Sir , no one having done so, we'll turn next to the

22 question, a question which is likely to be of most

23 importance, we recognise, to the families --

24 SIR JOHN SAUNDERS: Just before you move on, can I invite

25 Mr Penny, who's heard what you have said -- do you wish

1 to add anything to what's been said about the reporting

2 restrictions , Mr Penny?

3 MR PENNY: Only to say this , sir , and this of course is

4 perhaps self-evident from the reason for the order

5 in the first place: not only would breach of the order

6 amount to a contempt but it would also endanger the

7 question whether the trial of Hashem Abedi took place at

8 all or indeed jeopardise the start date of the trial

9 such that the trial would be put back.

10 So it couldn't be of more significance to the smooth

11 running of the trial that the reporting restrictions

12 which are in place are not breached.

13 SIR JOHN SAUNDERS: Okay, thank you for that.

14 MR GREANEY: Sir, Mr Penny has accurately identified the

15 risk that anyone would be taking, member of the press or

16 member of the public, if they were to report matters

17 which ought not to be reported.

18 So we then turn to the question of whether the start

19 date for the oral evidence hearings must be adjourned.

20 May we say that we share your disappointment that

21 this issue arises at all , but we know that the

22 disappointment is one that will be felt by the bereaved

23 families particularly acutely.

24 At the second pre-inquest review hearing, as long

25 ago as 28 February last year, you decided that the oral

1 evidence hearings in the inquests, as they then were,  
 2 would commence on 6 April of this year, subject to doing  
 3 so not prejudicing any ongoing criminal proceedings.

4 Since then, sir, you have routinely made clear that  
 5 it is important in the highest degree that that date  
 6 should be met and that is, we recognise, of particular  
 7 importance to the bereaved families who are entitled to  
 8 a date to focus on.

9 Since that date was determined, it has, of course,  
 10 been necessary for the inquests to convert to a public  
 11 inquiry. Notwithstanding the inquiry legal team has  
 12 continued to prepare for a 6 April start date, given the  
 13 importance of that date to the families, and in the  
 14 absence of further developments outside of our control,  
 15 we would be in a position to begin on that date. Sir,  
 16 that is something that we wish to be absolutely clear  
 17 about. Were it not for those developments, this inquiry  
 18 and the oral evidence hearings would have been starting  
 19 on 6 April.

20 However, it has been apparent since Hashem Abedi's  
 21 extradition from Libya on 17 July of last year that  
 22 whatever the extent of the preparations of the inquiry  
 23 legal team, Hashem Abedi's trial created a risk to the  
 24 6 April start date. That is because the inquiry oral  
 25 evidence hearings cannot commence, for perfectly obvious

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1 and good reasons, until the jury has returned its  
 2 verdicts in the trial of Hashem Abedi. To do otherwise,  
 3 to put it in simple terms, would risk prejudice to that  
 4 trial.

5 Furthermore, as the core participants well  
 6 appreciate, once the trial of Hashem Abedi has  
 7 concluded, it will be necessary for the inquiry legal  
 8 team to provide disclosure of the trial-sensitive  
 9 material to core participants. We anticipate that the  
 10 process of making that disclosure, coupled with the need  
 11 for the core participants to consider it, will take no  
 12 less than one month, bearing in mind the scale of that  
 13 material.

14 Pausing for one moment to give a little good news,  
 15 we should add that we now have the consent of the Crown  
 16 Prosecution Service to provide trial-sensitive material  
 17 to HMG on a rolling basis so that the sensitivity check  
 18 does not need to await the outcome of the trial and that  
 19 process has now begun.

20 To return to the start date, the trial of  
 21 Hashem Abedi was initially scheduled to start on  
 22 11 November 2019. But at a hearing on 21 October, it  
 23 was put back to start on 13 January of this year.

24 However, on 13 January, the trial was put back  
 25 further to start on 27 January, that is to say

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1 yesterday.

2 As you have observed, sir, these were matters for  
 3 the decision of the trial judge. Proceedings did  
 4 commence at the Central Criminal Court yesterday. They  
 5 commenced with legal argument, which has not yet  
 6 concluded, and we understand that there is no realistic  
 7 prospect, if any prospect, of live evidence in the trial  
 8 being called until next week at the earliest.

9 At a hearing before the trial judge last Friday,  
 10 24 January, it was confirmed that the time estimate for  
 11 the trial is about eight weeks. On that basis, the jury  
 12 would be expected to return its verdicts at the end of  
 13 March or the beginning of April.

14 It follows that the risk presented to the start date  
 15 in these proceedings of 6 April by the trial of  
 16 Hashem Abedi has come to pass, and sir, may we echo your  
 17 observations that on the basis of what we know, neither  
 18 GMP nor the CPS are at fault in the trial adjournments  
 19 that have occurred.

20 On 16 January, the inquiry legal team circulated to  
 21 core participants a note raising these issues as to  
 22 start date. The note raised three potential approaches:  
 23 attempt to start the oral evidence hearings on 6 April  
 24 as scheduled whilst recognising that it would then be  
 25 necessary to take a break in the proceedings after CTI's

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1 opening statement and after the pen portraits; second,  
 2 accept today, sir, that a start date of 6 April is  
 3 impracticable, if not impossible, and defer the start to  
 4 4 May on the basis that, by that date, the trial would  
 5 have concluded and disclosure given, which at the stage  
 6 of the note we thought was a realistic proposal; or  
 7 thirdly, accept the impracticability of starting on  
 8 6 April, but delay a decision on the start date until  
 9 28 February, when a further hearing is listed, by which  
 10 stage we would expect more information would be known  
 11 about the trial and its progress.

12 Sir, in that note, CTI advance no particular  
 13 proposal of our own, but instead we have sought on your  
 14 behalf any submissions of core participants and we  
 15 sought those by 20 January. You received submissions  
 16 from many core participants in response, including,  
 17 importantly, from all of the representatives of the  
 18 bereaved families who, of course, are principally  
 19 affected by this issue.

20 Unsurprisingly, the submissions of the core  
 21 participants do not advocate a single approach.  
 22 However, they have all been helpful and they have formed  
 23 part of CTI's analysis and the proposals that we now  
 24 make for your consideration.

25 Our position today, having regard to all of the

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1 submissions and on the basis of what is currently known,  
2 is as follows.

3 There is no prospect of the inquiry oral evidence  
4 hearings commencing on 6 April. This was generally the  
5 view of core participants, as expressed in their  
6 submissions, and is confirmed by the time estimate for  
7 the trial of Hashem Abedi given at the hearing on  
8 24 January.

9 Sir, we submit that you should recognise now that,  
10 for reasons wholly outside the control of the inquiry,  
11 the oral evidence hearings cannot start on 6 April.

12 In our judgement, the views of the bereaved families  
13 must be given particular weight in relation to what  
14 happens now. In their submissions they have  
15 understandably indicated a wish for certainty and,  
16 moreover, to be given certainty at this hearing and not  
17 at a subsequent hearing.

18 Given recent developments in the criminal  
19 proceedings and the uncertainty involved in any criminal  
20 trial, we are far from confident that it would be  
21 possible to commence the oral evidence hearings on  
22 4 May. So our understanding, in other words, has  
23 developed since our notes of 16 January.

24 Setting a start date in May would do no more or may  
25 do no more than create a risk that hopes will again be

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1 dashed if we have to change it once more.

2 In the circumstances, we are reluctantly compelled  
3 to propose a start date for the inquiry oral evidence  
4 hearings in June. The following can be said of a June  
5 start date. First, whilst the date upon which the trial  
6 ends is obviously outside the control of the inquiry,  
7 we are, at the risk of tempting fate, confident on the  
8 basis of what we currently know that a start date  
9 in June will provide sufficient time for the trial to  
10 end, assuming it ends with verdicts, disclosure to take  
11 place, and core participants to have time to consider  
12 the materials that we disclose.

13 Second, there is much to be said, in our view, for  
14 delaying a decision about start date until the hearing  
15 on 28 February when the position should be much clearer.  
16 However, we've listened to the bereaved families, who  
17 have argued strongly that a further month of uncertainty  
18 would be damaging for them. To give anything like  
19 certainty now within the limits of our control requires  
20 you, sir, to set a start date in June, not May.

21 Thirdly and furthermore, it seemed to us, on  
22 reflection, that starting on 4 May, in any event,  
23 created a risk that the pen portraits would not be  
24 concluded before 22 May. The inquiry will, for  
25 perfectly obvious reasons, not sit on 22 May, and we are

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1 concerned about the prospect of pen portraits spanning  
2 the anniversary.

3 Whilst we regard this as principally a matter for  
4 the families, we would well understand if they wished  
5 the commemorative hearings to be completely finished  
6 before the anniversary or all to start afterwards.

7 Accordingly, whilst, as we have said, we're deeply  
8 disappointed it has come to this, we invite you to  
9 adjourn the oral evidence hearings from 6 April to start  
10 instead in June. If, sir, you agree, the question of  
11 which date in June arises.

12 We know that the very start of June raises  
13 particular sensitivities for some of the families, as  
14 Mr Cooper set out in writing. He advocates a start date  
15 of 15 June and it seems to us that once we move to June,  
16 it makes little difference whether we start on the 1st  
17 or the 15th, and we know that you will listen very  
18 closely to that which will be said on behalf of the  
19 families.

20 We now invite submissions on this topic, and this  
21 topic only, start date, and we do so in the following  
22 order. Given how pressing time is, we invite  
23 submissions first of all from Mr Penny, followed by  
24 submissions on behalf of the families, perhaps from  
25 Mr Cooper first, and then from any other core

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1 participant who wishes to address this particular issue.

2 SIR JOHN SAUNDERS: Mr Penny, are you happy to address me  
3 before we hear from the families?

4 MR PENNY: Sir, on the issue of start date, I think all the  
5 relevant information that I have has already been  
6 relayed to you and to the hearing by my learned friend.  
7 There is legal argument that's ongoing. The estimate of  
8 the trial given to the judge on Friday of last week was  
9 eight weeks.

10 SIR JOHN SAUNDERS: Thank you.

11 MR PENNY: Insofar as the release of material is concerned,  
12 as indicated in our written submissions, there are no  
13 facts as yet agreed. As and when they are agreed, if  
14 we are satisfied that there is no risk to the delivery  
15 of a fair trial, we will endeavour to release such  
16 material as we can, which forms the basis of those  
17 agreed facts.

18 SIR JOHN SAUNDERS: Right. Thank you for that.

19 MR PENNY: That's an ongoing process.

20 SIR JOHN SAUNDERS: Right. I would invite you, if you can,  
21 to stay to listen to what the families have to say.

22 Do you have to be away at 11 o'clock?

23 MR PENNY: No, no, I will stay. I've got a few submissions  
24 to make as to that which has been put into writing. I'm  
25 content to do that just now if, sir, you would like

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1 that, or I'm content to do so after listening to the  
2 families or, rather, the submissions which have been  
3 made by Mr Cooper and Mr Weatherby, to be precise, as to  
4 criticisms which have been levelled at the Crown  
5 Prosecution Service in the discharge of its duty within  
6 the criminal justice system.

7 SIR JOHN SAUNDERS: Okay.

8 MR PENNY: So whatever, sir, you believe is the best order  
9 or the inquiry believes is the best order on that issue  
10 (overspeaking) specifically to the question of what  
11 start date.

12 SIR JOHN SAUNDERS: Thank you. It makes more sense to me  
13 if we hear what may be criticisms, if they're going to  
14 be made in public, and for you to respond to them after  
15 they have been made rather than the other way round. So  
16 I think I'll invite Mr Cooper or Mr Weatherby to start.  
17 Mr Cooper.

18 MR COOPER: Thank you, sir. Can I deal firstly with the  
19 issue of start date. I'm grateful to Mr Greaney for  
20 outlining the chronology of the matter.

21 We, in liaison with a number of parties, do urge you  
22 to grant the start date now, given the position we're  
23 in, unavoidably, it seems, of 15 June. There are  
24 a number of reasons for that. But primarily, those who  
25 we represent are very concerned that the start date, if

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1 it is to be in June, gives a barrier or at least  
2 a period of time between the date of this tragedy  
3 in May, the grieving process that has taken place, the  
4 weeks that followed the tragedy of slow information  
5 being provided and indeed learning of the tragic events.  
6 It is not just 22 May, it's the weeks after as well,  
7 when the enormity of the tragedy was sinking in, if  
8 I can put it that way.

9 So to enable there to be a clean start with that  
10 barrier, as it were, by way of anniversary, we do urge  
11 you, sir, to grant the start date, given the position  
12 that we are now in, to 15 June.

13 That said, of course, as Mr Greaney has properly  
14 pointed out, it is with regret, and I think I express  
15 the regret of all concerned, all the parties, including  
16 you, sir, and your team, that we're having to consider a  
17 June start date, but we accept, sadly, the reality of  
18 the position and won't detain the inquiry with discourse  
19 about it.

20 We are, to use the inelegant expression, where  
21 we are on that. Given that position, we urge you  
22 strongly to accede to the request of the families.  
23 I have spoken -- I meant no discourtesy to others,  
24 I have just had the opportunity to speak to  
25 Mr Weatherby, who will obviously articulate his own

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1 views, but I don't think there's disagreement, certainly  
2 between us, on the submission of 15 June. I apologise  
3 to others who I haven't had the chance to speak to; it's  
4 not a discourtesy and I hope none is taken.

5 Can I refer to our document, sir, which we lodged  
6 with the inquiry on 20 January? I think it's at tab 12.  
7 It is certainly my tab 12. It may well be an internal  
8 tabulation. Indeed it is. It's our response, in any  
9 event, to your --

10 SIR JOHN SAUNDERS: Yes, it is tab 12, thank you.

11 MR COOPER: Thank you.

12 I know Mr Penny has had an opportunity, and we're  
13 grateful for his written response, which we've read and  
14 considered, and I know Mr Penny will no doubt want to  
15 respond orally to the observations we make.

16 We do and continue to have significant concerns  
17 about the process, firstly of disclosure, as far as the  
18 CPS are concerned.

19 We are at a loss to understand why it is we cannot  
20 at least have some disclosure before the trial finishes.  
21 We readily accept, of course, some of us with experience  
22 in the criminal courts, significant experience of the  
23 criminal courts, that certain disclosure is sensitive  
24 and cannot be made. We're realistic.

25 But we find it hard to accept -- and certainly those

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1 who we represent find it hard to accept -- that we  
2 cannot get at least some flow of disclosure connected  
3 with the trial that will enable us to begin our  
4 preparations properly to assist you, sir, in your  
5 inquiry.

6 For instance, when one looks down the list of things  
7 that are not being disclosed to us, such as flyover  
8 details, I won't go into the details, but that sort of  
9 thing, we are at a loss to understand why that is so  
10 sensitive that we can't have it now. We are frustrated  
11 that we're getting little or nothing from the Crown  
12 Prosecution Service on that.

13 We say in passing that frustration also has to be  
14 expressed in terms of the information and the  
15 communication that is emanating, either from the Crown  
16 Prosecution Service, or from the police as to progress  
17 of the criminal trial, so far as they can give the  
18 tight restrictions, which we readily understand. But  
19 the families, again, who we represent are frustrated  
20 that they're getting little or no information as to the  
21 process and some of our clients are actually getting it  
22 second or third-hand, sometimes from the media, via  
23 media reporting.

24 We would ask for an improvement in that level of  
25 communication.

24

1 I'll refer to one paragraph in particular as far as  
 2 our argument is concerned that we would like to address  
 3 you on directly. Paragraph 12. It concerns the review  
 4 of sensitivity. We do not understand why it is  
 5 necessary for Her Majesty's Government to be playing  
 6 a role in assessing sensitivity of disclosed or  
 7 undisclosed material to us when one presumes that  
 8 exercise has already been undertaken by the CPS. It's  
 9 the same process, we assume, that's being undertaken by  
 10 the Crown Prosecution Service that HMG then undertake  
 11 again.

12 That duplication of work will add again, we submit,  
 13 to the delay. But if there is a double assessment of  
 14 sensitivity, and we perhaps would like to flag this,  
 15 that we in due course would like to know, so far as you,  
 16 sir, feel it appropriate, whether the Crown Prosecution  
 17 Service, for instance, recommended disclosure and the  
 18 Government didn't, so that we can see what discrepancies  
 19 are occurring between the two levels of analysis.

20 That's the concern and that's the frustration again  
 21 that we have on behalf of the families. There's  
 22 a double assessment of sensitivity and we would like to  
 23 understand in due course if there are any differences of  
 24 opinion between the Crown Prosecution Service and  
 25 Her Majesty's Government.

25

1 But in short, what we're really submitting here is:  
 2 why should there be this double assessment of  
 3 sensitivity, which only causes delay? And so far as  
 4 we can have an explanation in your discretion, and  
 5 indeed when we hear from Mr Penny there may be reasons  
 6 why we can't have an explanation, and we'll listen to  
 7 them, but if we can have an explanation as to why there  
 8 is that double process of sensitivity checking, when  
 9 the Crown Prosecution Service -- and I know some of my  
 10 learned friends well -- are senior, experienced and  
 11 competent to do it themselves. Why is it being done  
 12 twice?

13 SIR JOHN SAUNDERS: Well, it may be Mr Penny won't be able  
 14 to explain that, except from the Crown Prosecution  
 15 Service's point of view, but it may be that someone on  
 16 behalf of HMG will be able to explain, maybe they're  
 17 looking for different things, but some explanation  
 18 clearly should be given.

19 MR COOPER: That may be a reason and I am trying to be as  
 20 neutral as I can be at this stage. But it requires, we  
 21 submit, explanation.

22 You have our submissions in full in our written  
 23 document, but our fundamental submission, practically,  
 24 given where we are, is for a 15 June start date.

25 SIR JOHN SAUNDERS: Thank you, Mr Cooper and let me assure

26

1 you I have read carefully your written submissions, as  
 2 indeed I have done everyone's before this hearing.  
 3 Thank you.

4 Mr Weatherby.

5 MR WEATHERBY: I have very little to add to those  
 6 submissions. We put our submissions in on 16 January.  
 7 In particular we were concerned about the information  
 8 flow. We raised the specific concern about the further  
 9 process of HMP (sic) security checking the material,  
 10 which we presumed would have been done by them prior to  
 11 the criminal trial, and therefore we didn't understand  
 12 why it should be done twice.

13 Can I just -- because it is so important, can I just  
 14 register the disappointment of those that I represent  
 15 that this date has slipped. It is recognised that  
 16 responsibility for that does not fall on this inquiry,  
 17 but given the information flow, we are at something of  
 18 a loss to understand as to how we have come to the  
 19 position which pertains at the moment. It probably  
 20 isn't helpful to go any further on that issue at the  
 21 moment and it may or may not be that that's something  
 22 that will need to be visited in the future.

23 But we are where we are. The 6 April date is  
 24 untenable and everybody agrees that, as far as I'm  
 25 aware.

27

1 The families do, as Mr Greaney says, want certainty.  
 2 We don't think there's much merit in putting it back  
 3 until 28 February. We are not in a position to say  
 4 whether 1 June is the proper start date because of the  
 5 information or the lack of information that we have, but  
 6 we certainly don't object to that if that's the decision  
 7 that you take, and whether it's the 1st or the 15th,  
 8 we are neutral on that issue.

9 SIR JOHN SAUNDERS: Is it a concern of the families that you  
 10 represent that it should be the 15th rather than the  
 11 1st?

12 MR WEATHERBY: Not as far as I'm instructed. I'm certainly  
 13 not opposing what Mr Greaney says. We simply say we  
 14 haven't got the information to say whether everything  
 15 can be ready by June. The families are very keen indeed  
 16 that a date is set and that it's a realistic date that  
 17 will not slip further. But I know you have that point.

18 SIR JOHN SAUNDERS: Thank you, Mr Weatherby.

19 MR GOZEM: Sir, we would support 15 June as being the most  
 20 realistic and practical start date.

21 I don't want to make any other submissions,  
 22 thank you.

23 SIR JOHN SAUNDERS: Thank you.

24 MR PAYTER: Sir, on behalf of the six families that  
 25 I represent, we recognise that 6 April is no longer

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1 feasible and we invite you to fix a new start date  
2 immediately and for that date to be the first available  
3 date by which you and your team are confident that the  
4 evidential hearings can proceed. We don't share the  
5 specific concern identified by Mr Cooper in relation to  
6 whether it's the 1st or 15 June, but, like Mr Weatherby,  
7 we don't stand in the way of it.

8 SIR JOHN SAUNDERS: I'm grateful, thank you.

9 MS MCGAHEY: Sir, on behalf of the government, may I address  
10 very briefly the issue of security checking and the  
11 question being raised of alleged duplication.

12 May I say, first of all, the process of security  
13 checking is not the same or not necessarily the same as  
14 that being done by the CPS. There is a very substantial  
15 difference between disclosure by the CPS to a defendant  
16 in criminal proceedings and the disclosure by this  
17 inquiry to core participants and ultimately to the wider  
18 public.

19 By way of example, if material that's not going to  
20 be used by the prosecution is disclosed as unused  
21 material to the defence and never used, it will never be  
22 seen in public at all, or it may be used by the defence  
23 and used peripherally, there may be a fleeting reference  
24 to it during the course of a very long trial.

25 Exhibits in the criminal trial may be mentioned by

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1 witnesses but no permanent public record will be placed  
2 on display. However, material in this inquiry is very  
3 different. Material that is disclosed may well be  
4 referred to in public hearings, images of it put up on  
5 screens for public viewing, and the document may  
6 ultimately be placed on the inquiry website and  
7 a permanent record thereby made available.

8 The concern of the Government is to ensure that  
9 absolutely nothing is made public that could make  
10 a future attack either more likely or more deadly if  
11 it is made. That is the only reason for doing this  
12 checking.

13 The intention of the Government is that the core  
14 participants to this inquiry will see all of this  
15 material or the absolutely overwhelming majority.

16 This is not material that I have viewed, I cannot  
17 say whether there is anything in any category considered  
18 so sensitive that it should not go to a core  
19 participant, but the intention very much is that the  
20 core participants should see everything.

21 The security checking will not, it is hoped, cause  
22 delay. As my learned friend Mr Greaney's explained this  
23 morning, there's now agreement to a rolling programme,  
24 so the CPS will disclose material to us now and checking  
25 will go on, so it is very much hoped that no element of

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1 this will cause delay, either to the timetable of the  
2 inquiry or even to the core participants seeing any of  
3 this material.

4 Sir, I hope that that provides some reassurance to  
5 Mr Cooper.

6 SIR JOHN SAUNDERS: Thank you.

7 Before I turn to Mr Penny again, can I invite any  
8 other submissions that people may have as to the start  
9 date.

10 Can I say, as Mr Greaney said, obviously there are  
11 attractions in saying, "Let's wait until 28 February",  
12 when we'll have more information about how the trial is  
13 going, but equally, I'm sure we all readily understand  
14 the sincere and heartfelt request to have a date which  
15 we can all meet at this stage rather than waiting.

16 MS BARTON: Sir, may I indicate that I rise to address the  
17 assertion made by Mr Cooper on behalf of his families  
18 that there has been a failure in communication that  
19 relates to the communication of information to the  
20 families about the trial.

21 Sir, I don't know whether it's convenient for me to  
22 deal with that now as it has been raised, or whether  
23 you'd rather that Mr Penny, who I think has other places  
24 to be, deals with the CPS response, and then I deal with  
25 this.

31

1 SIR JOHN SAUNDERS: Right. I think Mr Penny could go next  
2 because I don't think what you say will necessarily  
3 affect what he has to say.

4 MS BARTON: It won't, no.

5 SIR JOHN SAUNDERS: Mr Penny, you've heard what been said;  
6 would you wish to add anything?

7 MR PENNY: Yes. May I deal with what are in fact two issues  
8 which have been raised, although in fact I think  
9 possibly Mr Cooper's submissions have been elided in  
10 a way which will have caused confusion.

11 The disclosure of material to the inquiry is one  
12 thing. That's something which the Crown Prosecution  
13 Service in its role as an independent prosecutor within  
14 the criminal justice system, which has to have regard to  
15 the triangulation of interests which are inherent in the  
16 criminal justice system, is under a duty to deliver  
17 a fair trial. Any reluctance to release material which  
18 touches upon that trial is down to its concern in order  
19 to ensure that a fair trial is delivered.

20 It's exactly the same reason that Mr Justice Baker  
21 and, sir, with respect, you and counsel to the inquiry  
22 are concerned about reporting of matters which might  
23 jeopardise the fair trial. That is the reason for our  
24 concern about the release of the material touching upon  
25 the trial, the early stages, which may be the subject

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1 matter of, in due course, evidence heard at your  
2 inquiry.  
3 Disclosure in the criminal justice system is quite  
4 a different thing to disclosure to the defendant, and  
5 such criticisms as have been levelled by Mr Weatherby  
6 and Mr Cooper in the direction of the Crown Prosecution  
7 Service on the issue of disclosure in that context are  
8 totally wide of the mark, and the submissions which have  
9 been made therefore on the question of sensitivity  
10 equally so.

11 The submissions which are ongoing at the court  
12 at the Old Bailey, which started yesterday, touch upon  
13 two issues. Those who were watching yesterday will  
14 already be aware of that, namely that certain  
15 submissions have been made regarding the circumstances  
16 of the defendant's detention in Libya and return to the  
17 United Kingdom. We are currently at the stage where  
18 applications are being made under section 8 of the  
19 Criminal Procedure and Investigations Act. They are the  
20 subject matter of argument and are all ongoing.

21 The circumstances in which that arose are as  
22 follows. Sir, you will recall that on the last occasion  
23 that a PIR was held, I informed the court that it was  
24 anticipated that a defence statement would be served  
25 under the statutory structure of disclosure, namely

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1 22 November 2019. In fact, what happened was  
2 correspondence was not received on behalf of the  
3 defendant until 20 December.

4 A further document was served on 6 January and  
5 a defence statement ultimately materialised on  
6 16 January.

7 My learned friend Mr Cooper certainly will be well  
8 aware of best practice in relation to the question of  
9 disclosure, which is governed both by the statutory  
10 structure, by the guidelines, by the judicial disclosure  
11 protocol and by other matters within the Criminal  
12 Procedure Rules as to how these matters should be  
13 engaged with. The issues which were raised in those  
14 documents were raised in a way which was in direct  
15 contradiction to previous submissions which had been  
16 made to the court.

17 Those are the circumstances which led to the delay  
18 of the trial by two weeks and which led to the  
19 circumstances leading to the legal argument which is  
20 ongoing at the Old Bailey.

21 So I'm afraid the submissions which have been made  
22 in relation to the conduct of the Crown Prosecution  
23 Service in its conduct as an independent prosecutor,  
24 with all of those three interests to take into account  
25 in discharging its duty, are wide of the mark.

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1 SIR JOHN SAUNDERS: Right, Mr Penny.

2 You will know that what you have just told me was  
3 very much mirrored in the representations which were  
4 made to me on the basis that I would pass them on.  
5 I declined to do that on the basis that I would be  
6 breaching the reporting restrictions.

7 I now reiterate to everybody who is here that  
8 repeating what has been said outside of this court would  
9 be a breach of those reporting restrictions and could  
10 seriously prejudice a trial if it were to come to the  
11 knowledge of any potential juror in the case.

12 Once the trial proper starts then matters will be  
13 reported in the press which are going on in the trial  
14 and not subject to reporting restrictions, but I cannot  
15 emphasise enough that what you have just heard, apart  
16 from anything else, we haven't actually heard the other  
17 side of that particular discussion of which there always  
18 tend to be two sides to any argument in a courtroom, so  
19 we haven't heard that, and nor is it something that  
20 a jury would hear, except, I suspect, in exceptional  
21 circumstances, and I don't know what is going to be put  
22 out at the trial.

23 But please, I cannot emphasise enough that Mr Penny  
24 has made those things clear here to try and inform the  
25 families of what is going on. It must not be repeated

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1 outside this room and it would be a breach of the  
2 judge's reporting restrictions to do so.

3 Right, thank you, Mr Penny.

4 Mr Cooper or Mr Weatherby, I give you the  
5 opportunity to make a response if you wish to.

6 MR COOPER: Sir, we're grateful for the explanation. I'm  
7 sure all concerned will know how important it is that we  
8 get as much transparency as we can is to those we  
9 represent, but I have no further submissions.

10 SIR JOHN SAUNDERS: Mr Weatherby?

11 MR WEATHERBY: Likewise. I reiterate that the families  
12 very, very much want the CPS to do the best job that  
13 they can and the submissions that we make are not in any  
14 way critical of the CPS for any reasons other than that  
15 which I have already adverted to.

16 The submissions that we make can only be made on the  
17 basis of the information we have and we did not have the  
18 information that has just been provided to us.

19 SIR JOHN SAUNDERS: That's partly down to me, as you'll  
20 appreciate, because of my view of me publishing what had  
21 been said to me round to all the parties in the hearing.

22 MR WEATHERBY: Yes, indeed. All we have sought to do all  
23 the way through is to encourage the maximum amount of  
24 information that can properly be provided to the  
25 families, and that's all we do now.

36

1 SIR JOHN SAUNDERS: Okay, thank you.  
 2 Mr Penny, do you wish to stay to hear what Ms Barton  
 3 says on behalf of the Greater Manchester Police or have  
 4 you other things to do?  
 5 MR PENNY: I think I will if I may do. I think I will wait  
 6 to listen to that.  
 7 SIR JOHN SAUNDERS: Okay, thank you.  
 8 MS BARTON: Thank you, sir.  
 9 I want to address on behalf of Greater Manchester  
 10 Police the very same difficulties about communicating  
 11 information to the families, as has been encountered by  
 12 this inquiry and the Crown Prosecution Service.  
 13 Since the tragic events of 22 May, the officers and  
 14 staff of GMP have used their very best endeavours to put  
 15 the family at the centre of everything they do, both for  
 16 this inquiry and for the criminal trial.  
 17 They do wish to stress that they're grateful for the  
 18 cooperation and understanding of the families with  
 19 regard to the information that they can communicate at  
 20 what is a very difficult time for them, we appreciate.  
 21 GMP appreciates that families want and need to  
 22 understand not only the progress of this inquiry but  
 23 also the progress made in the trial. But we recognise  
 24 that families have individual preferences about how and  
 25 what information is communicated to them. It is for

1 that reason that officers and investigators have made  
 2 real efforts to provide information comprehensively, but  
 3 sensitively, throughout by not treating family members  
 4 as a group but as individuals and taking into account  
 5 their individual preferences.  
 6 Sir, everyone involved in this process, as Mr Cooper  
 7 and Mr Weatherby have just indicated on behalf of the  
 8 families, want the criminal trial to be effective. It  
 9 really matters to all. As such, the information that  
 10 can be provided about the trial is limited to ensure  
 11 that no prejudice will be caused.  
 12 GMP is grateful for the understanding that the  
 13 families have shown, but the decision on what material  
 14 may be released in respect of the criminal trial is not  
 15 one for GMP, but more properly for prosecutors liaising  
 16 closely with GMP to assist with regard to the provision  
 17 of that information.  
 18 We are indebted, sir, to the Crown Prosecution  
 19 Service for their support in this very difficult  
 20 balancing exercise. Similarly, all of the court  
 21 processes connected with the criminal trial are not  
 22 controlled by GMP and therefore GMP cannot be the  
 23 decision maker in terms of what is made available.  
 24 The families, sir, and you need to be assured that  
 25 GMP has always stood willing to disclose to bereaved

1 families information about both processes, that is the  
 2 criminal trial and this inquiry, insofar as it is able  
 3 to do so. But GMP is labouring under the same  
 4 restrictions relating to the criminal trial as apply to  
 5 you, sir, as chairman of the inquiry and which you  
 6 articulated so clearly at the commencement of these  
 7 proceedings.

8 Sir, we understand and share the caution of the  
 9 prosecution, who have expressed concern about breaching  
 10 the order of Mr Justice Baker or doing anything which  
 11 might jeopardise the integrity of the trial. So as  
 12 such, and within the limits of what may be properly  
 13 provided to the families without causing prejudice to  
 14 the trial, GMP officers and staff have always sought to  
 15 brief families as thoroughly and sensitively as they  
 16 can, but it is inevitable that bereaved families will  
 17 want different things in respect of how they are  
 18 updated.

19 From the outset of this tragedy, family liaison  
 20 officers were deployed to each family. Initially, they  
 21 provided daily support for the first weeks and they  
 22 continue to be involve right up to today, albeit with  
 23 a different level of support, sir, to that which was  
 24 available initially.

25 Initially, as was usual, updates would be delivered

1 in person through the FLOs, but due to the fast-moving  
 2 nature of modern media, information did sometimes reach  
 3 families before it could be communicated verbally by  
 4 FLOs.

5 So to address the point which Mr Cooper specifically  
 6 raised about families getting information through the  
 7 media before GMP, an email update system has been set up  
 8 to alert families as quickly as possible. This email  
 9 update system is supported by text messages. This was  
 10 put in place with the consent and cooperation of the  
 11 families to contact them in that way.

12 Alternative methods of communication, sir, are also  
 13 available to the families, both in person and by phone,  
 14 and they're offered if families prefer that. You will  
 15 appreciate that each piece of information that is  
 16 communicated has to be carefully considered before it is  
 17 sent and the investigation team has sought to balance  
 18 providing as much information as they can within the  
 19 constraints that they're working under while  
 20 endeavouring to anticipate, as far as possible, the  
 21 impact of the message they're sending. If it is  
 22 inappropriate to send by email, then personal  
 23 communication by FLOs has been used as a more sensitive  
 24 alternative.

25 In terms of providing a consistent message to

1 everyone, we believe this service has worked well and  
 2 other agencies, including the Mayor of  
 3 Greater Manchester, the local authority, the Manchester  
 4 Memorial Advisory Group, the NHS Resilience Hub,  
 5 Transport for Greater Manchester, and the We Love  
 6 Manchester Emergency Fund have all used it to  
 7 communicate with families. So it's a system which has  
 8 been set up not just for GMP but for others who can  
 9 assist.

10 However, the investigation team is alive to the  
 11 undoubtedly very different expectations of families and  
 12 we do welcome, sir, any suggestions on how better to  
 13 communicate with families, because GMP assures core  
 14 participants that we will always endeavour to  
 15 accommodate requests as far as possible.

16 In the last few days, and in accordance with the  
 17 planned approach given the imminent anticipated start of  
 18 the trial, the senior investigation team held meetings  
 19 in both Gateshead and Manchester to which families were  
 20 invited in order to be given an update on the  
 21 investigation and trial process. The content of this  
 22 briefing had been approved in advance, as was necessary,  
 23 by the Crown Prosecution Service.

24 It is regrettable that meetings that had been  
 25 planned to take place some weeks previously had to be

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1 cancelled because they had to take place very close to  
 2 the trial date and the trial had been pushed back. The  
 3 investigators were mindful of the impact that that delay  
 4 had on the families, but again it was something outside  
 5 of GMP's control.

6 Sir, for your information, 34 family members felt  
 7 able to attend the meetings this week, each of which  
 8 lasted several hours and which sought to offer as much  
 9 information as possible and respond to any issues or  
 10 questions. Given the highly personal nature of the  
 11 information discussed, some families objected to the  
 12 presence of legal representatives, so GMP respected this  
 13 and meetings were reserved for families only. But  
 14 should families who didn't feel able to come to those  
 15 meetings wish to have a briefing then GMP will work to  
 16 accommodate this.

17 Since the meeting three families have in fact  
 18 requested an overview meeting rather than a full  
 19 briefing, and that will be provided.

20 In addition, on 13 January, one family attended  
 21 court re the criminal trial and investigators at court,  
 22 including the senior investigating officer, Detective  
 23 Chief Superintendent Barraclough, were able to take the  
 24 opportunity to spend time explaining the process and  
 25 next steps, and leading and junior counsel also met the

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1 family and described the process and gave some answers  
 2 to questions.

3 So GMP again takes the opportunity to extend that  
 4 offer of meeting families in person at their convenience  
 5 and to explain the process if they wish.

6 Officers and staff, sir, have tried throughout to  
 7 recognise that the same type of communication will not  
 8 be appropriate for all families. With this in mind, GMP  
 9 has sought instead to offer, as far as it can, a service  
 10 to all family members which can be accessed on their  
 11 terms. Communication mechanisms are in place and  
 12 officers are seeking to provide the families with  
 13 a personal service, ensuring they're available on the  
 14 phone, by email or in person to answer questions.

15 It has always been left to the families to decide  
 16 how and if they wish to access information. Requests  
 17 for other forms of have been respected and accommodated  
 18 where possible.

19 For example, some families do wish to have legal  
 20 representatives present and copied in to email updates  
 21 while others do not. Consequently, an agreement was  
 22 reached whereby some legal teams are separately emailed  
 23 to ensure they receive the information where families  
 24 wish them to do so.

25 We welcome any other suggestions or ideas about how

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1 to improve communications and reiterate that within the  
 2 constraints which are currently in place, and about  
 3 which GMP can do nothing, GMP officers and staff will  
 4 always do their best to accommodate the requests of the  
 5 families.

6 Sir, it is not through any lack of effort on the  
 7 part of GMP that the communications that are sometimes  
 8 very swift in terms of both social media and general  
 9 media have beaten GMP to it. We think there is now  
 10 a system in place which should avoid that happening and  
 11 so we urge the families to use it.

12 MR COOPER: On the back of that, if I could just make  
 13 a short response.

14 SIR JOHN SAUNDERS: Of course you may. This has been, if  
 15 I may say so, a very positive hearing so far. I'm  
 16 really keen to keep that going. Some of the things  
 17 which have just been said I can understand might not be  
 18 welcome to some people here and they might want to  
 19 respond.

20 MR COOPER: I am not going to be negative.

21 SIR JOHN SAUNDERS: Thank you.

22 MR COOPER: I don't want to get that reputation so early in-  
 23 the inquiry --

24 SIR JOHN SAUNDERS: I am not saying you shouldn't be,  
 25 just --

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1 MR COOPER: Two points, in fact.  
 2 I'm not aware, as far as the families who instruct  
 3 us, that they have ever said that lawyers should be  
 4 excluded from these briefings on the grounds of  
 5 sensitivity. Of course, I bow if that has been said and  
 6 respect if that has been said.

7 I am concerned that there is no invitation, subject  
 8 to good reason being expressed, for those representing  
 9 families not to be at these briefings, particularly  
 10 given that many of our clients might not be able to  
 11 attend these briefings and so there would be  
 12 a representative there who could report back.

13 I would like in due course more particularity on why  
 14 lawyers are excluded from these briefings, but the only  
 15 other matter I raise, hopefully it's uncontroversial, is  
 16 that these email communications that are sent out to  
 17 families -- I wonder whether our instructing solicitors  
 18 could also be on that list as well? It's something that  
 19 my solicitor has just raised with me. It'd be very  
 20 helpful if, when there are email communications to  
 21 families on pertinent issues if solicitors are included  
 22 in that thread.

23 MR WEATHERBY: Again, very little to add.  
 24 Certainly all of the families I represent want us  
 25 lawyers to be able to help them and advise them and

1 positively want us to be involved in briefings and  
 2 emails.

3 Both of the solicitors that instruct me are very  
 4 experienced in this area, both of their doors are wide  
 5 open for collaboration with the police or the CPS about  
 6 the information flow.

7 We have made submissions throughout this process  
 8 about the lack of information. I'm not going to go  
 9 further with respect to that because I think it would be  
 10 unhelpful given the state of the proceedings in London  
 11 in particular at the moment. But I'm going to use the  
 12 phrase I used earlier again: we are where we are.

13 We certainly reach out and would like to be  
 14 collaborative about this and we seek the maximum amount  
 15 of information to go to the families as can go to the  
 16 families at the particular time, and the maximum amount  
 17 of explanation where information cannot go to them.

18 SIR JOHN SAUNDERS: Mr Weatherby, as you're on your feet,  
 19 I'll address you.

20 Clearly, the inquiry will operate through the legal  
 21 representatives and everything will be done that way  
 22 and, it would seem helpful to me, if that were possible,  
 23 with the Greater Manchester Police as well. Apart from  
 24 anything, there is a huge amount of experience of  
 25 criminal trials within this courtroom and it is

1 extremely helpful for the lawyers who have that  
 2 knowledge to be explaining the details of what is  
 3 actually going on.

4 MR WEATHERBY: Yes.

5 SIR JOHN SAUNDERS: If there are families who don't want  
 6 their lawyers involved, no doubt they have good reason  
 7 for that, but they would, I'm sure, find benefit from  
 8 having their lawyers explain what may be going on and  
 9 also to explain why things can't be said, which you will  
 10 understand with your experience, which may not be  
 11 obvious to members of the public, and I readily  
 12 understand that.

13 So I would encourage the communication to go on,  
 14 including the lawyers as well, because they're obviously  
 15 playing a very important part in this process.

16 I would also observe that hopefully this is a very  
 17 short period over which these matters are of concern.  
 18 So the reporting restrictions which at the moment apply  
 19 will continue to apply to what has been said before the  
 20 trial starts. Once the trial itself starts, then, as  
 21 I think we're going to hear, that we are going to be  
 22 supplying to the lawyers in the case transcripts of the  
 23 daily proceedings. These will be things which are not  
 24 covered by reporting restrictions, otherwise they  
 25 wouldn't be in the transcripts.

1 So everyone then will know exactly what is happening  
 2 and can be brought up to date, and if you have the time  
 3 and the patience you can even read all of the  
 4 transcripts, no doubt so everyone will know exactly what  
 5 is going on.

6 We're in what I hope will be a short period where  
 7 these things are actually carrying on so I hope that's  
 8 a degree of comfort to people.

9 MR WEATHERBY: Yes, that's very helpful. Can I say that the  
 10 role of your team in respect of the information flow has  
 11 been positive throughout.

12 SIR JOHN SAUNDERS: Thank you for that.

13 MR WEATHERBY: As I'm on my feet, I may as well deal with it  
 14 now. We would strongly commend the suggestion of your  
 15 team that full transcripts are provided.

16 SIR JOHN SAUNDERS: Yes.

17 Mr Penny, you're looking to say something in view of  
 18 what's been said?

19 MR PENNY: Yes. I just want to mention of course that  
 20 a full transcript of what goes on in court would include  
 21 legal argument in the course of a trial.

22 SIR JOHN SAUNDERS: Okay. We will make sure we will edit  
 23 anything which shouldn't be there. So we are aware that  
 24 no legal argument should be disclosed and we'll also be  
 25 aware of any orders which are made.

1 MR GREANEY: May I provide reassurance on the issue of the  
 2 transcript. What will be supplied to the core  
 3 participants is a "jury in" transcript. So it will not  
 4 contain any legal argument; it will simply deal with the  
 5 evidence and opening and closing speeches and so on.

6 SIR JOHN SAUNDERS: I'm sorry to have caused alarm,  
 7 Mr Penny, but I hope you are reassured about that.

8 I know that the transcribers would like a break of  
 9 10 minutes, and at the end of that I'll come and give my  
 10 ruling on the start date, unless anybody wants to say  
 11 anything else.

12 Mr Penny, thank you very much for your attendance  
 13 and obviously you are free to go back to the day job.

14 Thank you.

15 (11.30 am)

(A short break)

17 (11.40 am)

RULING

19 SIR JOHN SAUNDERS: Everyone is agreed that to start the  
 20 inquiry at the beginning of April is no longer possible.  
 21 It is therefore inevitable that the start of the inquiry  
 22 has to be put back. That is not a satisfactory  
 23 position, I regret it, but there is absolutely nothing  
 24 that I or anyone could do about it.

25 In deciding on a new date to start, it will not be

1 possible to accommodate everyone's wishes. Everyone  
 2 wants the inquiry to start as soon as possible, but  
 3 equally people want to have a date which will not have  
 4 to be changed again.

5 Some parties have suggested that I should not commit  
 6 to a start date until we know more about the progress of  
 7 the trial. That is a perfectly understandable and  
 8 sensible position. Others, particularly the families,  
 9 want to know the new date as soon as possible so that  
 10 they can plan their lives, which again is perfectly  
 11 understandable.

12 In fixing a date I not only have to try to assess  
 13 when the trial will have ended but also to allow time  
 14 for the parties to assimilate any disclosure that has  
 15 had to await the end of the trial. While attempts will  
 16 be made to reduce the quantity of that disclosure by  
 17 disclosure during the trial, there is still likely to be  
 18 some.

19 It has been suggested that bearing in mind the  
 20 uncertainty in any trial process, that may not all be  
 21 concluded by the beginning of May. That is a worst case  
 22 scenario, but it is necessary at this stage to look at  
 23 the worst case.

24 I have made it clear that in dealing with the issue  
 25 of the start date, I will place the wishes of the

1 families above the wishes of other participants as the  
 2 effect on them is the greatest. There seems to be  
 3 a consensus among the families that while they would  
 4 prefer an earlier start date, a start in June would give  
 5 the necessary degree of certainty that everything will  
 6 be in place by then.

7 Mr Cooper, on behalf of the large group of families  
 8 that he represents, would strongly prefer waiting until  
 9 15 June to start. That is because the families he  
 10 represents would wish not only to avoid the anniversary  
 11 of the dreadful news of the deaths, but the period  
 12 immediately after that when they were getting further  
 13 news and having to assimilate what happened.

14 I have absolutely no desire to lose any more time  
 15 than we have to, but in order to minimise as far as  
 16 possible the distress to the families, I am prepared to  
 17 do what Mr Cooper invites me to do and start on 15 June.

18 It is a delay of two and a half months, which is  
 19 more than I had hoped would be necessary, but some  
 20 delay, as I have said, was inevitable.

21 Having made that ruling, I just want to say one  
 22 further thing, which arises out of my experience as  
 23 a practising barrister. Everyone has been working very  
 24 hard to meet the directions that I have made for which  
 25 I am grateful and by and large they have been met. Once

1 there is an adjournment, it is very easy to think that  
 2 there is now a great deal of time and to put off what  
 3 needs to be done until a later time. Please do not do  
 4 that. The time of the adjournment will pass very  
 5 rapidly. There is still a great deal of work to be done  
 6 and the more that can be achieved before the start of  
 7 the oral hearings, the smoother the hearings will be.

8 I hope that has not insulted anyone for me to say  
 9 that; it arises from my own experience when adjournments  
 10 have crept up on me before I expected them to do.

11 So 15 June is the start date.

12 Mr Greaney, it occurs to me that actually the fact  
 13 of the start date being put back to 15 June is clearly  
 14 something which is reportable, and it may be also that  
 15 it's clearly reportable that the reason for putting it  
 16 back to 15 June is because of the delays to the trial  
 17 process.

18 MR GREANEY: We certainly agree that the fact that the start  
 19 of the oral evidence hearings has been moved back to  
 20 15 June is something which be safely be reported, but we  
 21 may we reflect upon whether reporting of the reasons for  
 22 that can properly be reported?

23 SIR JOHN SAUNDERS: So if you wouldn't mind holding on for  
 24 a bit longer, members of the press, we'll tell you as  
 25 soon as we can what can be reported. At the moment,

1 please hold your pens.  
 2 MR GREANEY: We will have a short break at the end of all  
 3 submissions, which hopefully will be just before lunch,  
 4 but it may be just after lunch, and will inform the  
 5 press of our view so you, sir, can make a decision.  
 6 Submissions on transcripts  
 7 MR GREANEY: In the meantime, may we move to the third issue  
 8 on the agenda? Transcripts.  
 9 It is obviously important that core participants  
 10 should be made aware of the evidence which is given  
 11 in the trial of Hashem Abedi whilst that trial is  
 12 underway.  
 13 Sir, the inquiry legal team has considered how best  
 14 to distribute that information during the course of  
 15 Hashem Abedi's trial. At the hearing before you on  
 16 22 November, we proposed a particular approach. There  
 17 is no value in repeating that now because we've thought  
 18 better of it and our new proposed approach will provide  
 19 core participants with more, not less.  
 20 What we now propose, subject to the views of the  
 21 core participants, is that by 10 am on the Tuesday of  
 22 each week of the trial, we will supply two things.  
 23 First of all, a note setting out in summary form the  
 24 evidence that has been heard during the previous week,  
 25 that is to say the Monday to Friday preceding that

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1 Tuesday. The core participants can then use that  
 2 summary as a guide to the transcripts.  
 3 Secondly, sir, we will supply at the same time  
 4 a transcript of the whole of the witness evidence that  
 5 has been given during that period.  
 6 Sir, we anticipate that that proposal is unlikely to  
 7 be contentious. If anyone wishes to make a submission  
 8 about it, we invite it now.  
 9 MR WEATHERBY: Briefly, we strongly support that sensible  
 10 proposal.  
 11 In terms of the legal arguments, we fully understand  
 12 that the legal argument transcripts would not be  
 13 properly disclosable until the end of the process. But  
 14 it occurs to us on what little we know about the basis  
 15 of the legal arguments that there may be information, or  
 16 indeed evidence included in the legal submissions which  
 17 is of relevance to these proceedings.  
 18 So could we add a request that transcripts of those  
 19 are provided at some point as appropriate?  
 20 SIR JOHN SAUNDERS: Certainly. It may be after the trial  
 21 process and it would have to be, I think, with the leave  
 22 of the trial judge.  
 23 MR WEATHERBY: Yes.  
 24 SIR JOHN SAUNDERS: We will try and make arrangements for  
 25 that, assuming he's in agreement, yes.

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1 MR WEATHERBY: Thank you very much.  
 2 MR GREANEY: Sir, I believe that we will be receiving not  
 3 only "jury in" transcripts but also "jury out"  
 4 transcripts; I can see Mr Suter nodding. We will have  
 5 that material and, subject to the matters you have  
 6 mentioned, we will at some stage be able to disclose  
 7 that material.  
 8 SIR JOHN SAUNDERS: Right.  
 9 Mr Cooper?  
 10 MR COOPER: Would you bear with me? Could I speak to  
 11 Mr Greaney for a moment?  
 12 SIR JOHN SAUNDERS: Of course. Just turn the microphone  
 13 off.  
 14 (Pause)  
 15 MR COOPER: I'm content, thank you.  
 16 SIR JOHN SAUNDERS: Thank you.  
 17 Submissions on positions statements  
 18 MR GREANEY: So issue 4, position statements.  
 19 There is no doubt that this is a much more difficult  
 20 issue than the issue we've just addressed.  
 21 We, as CTI, hope that we have identified a way  
 22 through it that all core participants will regard as  
 23 sensible and proportionate even if it is not what they  
 24 have argued for.  
 25 In our written submissions we identified, sir, that

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1 you had received written submissions in support of  
 2 position statements from all of those representing  
 3 bereaved families and submissions against position  
 4 statements from many of those representing state and  
 5 non-state core participants.  
 6 On analysis of all of those submissions, however, it  
 7 seemed to us that the split was more nuanced and less  
 8 stark than might have been thought because that is to  
 9 say that a number of state and non-state core  
 10 participants did see force in the idea that you might  
 11 usefully be provided with at least some of the  
 12 information that it was proposed be covered in position  
 13 statements.  
 14 Sir, our submissions as CTI have been set out in  
 15 writing in a written document that was served yesterday  
 16 evening and we don't propose to read out every word.  
 17 Sir, what we will do is to summarise what our position  
 18 is for the benefit of those who haven't seen the note.  
 19 Our submissions on this topic are in two stages.  
 20 The first stage addresses the substance of the benefit  
 21 it is argued position statements will bring, so what is  
 22 to be gained from them. The second stage will address  
 23 the form in which those benefits, if there are any,  
 24 might be achieved. That is to say, in the form of  
 25 position statements or in some different way.

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1 So substance, first of all. The question for you,  
 2 sir, may we respectfully submit, is what will best  
 3 enable you to discharge your responsibilities and how  
 4 that is to be achieved, and those are decisions personal  
 5 to you. Is it through position statements and, if so,  
 6 what form should they take, or, as we have indicated, is  
 7 there some better way of achieving what has been  
 8 identified by those advocating the utility of position  
 9 statements?

10 Our view as CTI is neither the statutory framework  
 11 nor the authorities provide an express answer to those  
 12 questions and that they're ultimately matters for you to  
 13 determine having regard to section 17(1) of the  
 14 Inquiries Act 2005.

15 In his detailed and helpful written submissions on  
 16 behalf of some of the families, Mr Weatherby seeks  
 17 position statements from the state and non-state core  
 18 participants limited to the following four areas.  
 19 I will set out what those are:

- 20 (a) An explanation of the core participants'
- 21 responsibilities, processes, policies and resources;
- 22 (b) He seeks a narrative of the core participants'
- 23 performance with respect to the terms of reference of
- 24 this inquiry;
- 25 (c) Learning since the incident in question; and.

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1 (d) The performance of others but only, he  
 2 indicates, so far as it affected them and was within  
 3 their knowledge.

4 As a starting point, we agree that you, sir, and  
 5 indeed all core participants, are likely to be assisted  
 6 by the provision of all of that information from the  
 7 relevant core participants, but we agree with that  
 8 in the sense that we shall set out in a moment.

9 However, we do not consider that at this stage in  
 10 the proceedings a position statement is the best way of  
 11 obtaining that information.

12 Furthermore, whilst we consider that it is  
 13 reasonable to expect core participants to deal with(a)  
 14 and (c) in Mr Weatherby's list before disclosure and the  
 15 service of the inquiry expert reports has been  
 16 completed, we do not consider it reasonable for them to  
 17 expect them to address (b) and (d) before that stage.

18 So, sir, having set out our position on substance,  
 19 namely that we consider that there is substance in what  
 20 it is suggested position statements will bring, we turn  
 21 to the second stage of our submissions, namely form.

22 What we intend to do is to address each of the four  
 23 sub-paragraphs in Mr Weatherby's request or suggestion.

24 So (a), as we indicated, is:  
 25 "An explanation of the core participants'

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1 responsibilities, processes, policies and resources."

2 Our view is that substantial progress has already  
 3 been made in relation to this issue, issue (a). All  
 4 relevant core participants have been requested to  
 5 provide a corporate witness statement from a senior  
 6 member of the organisation and/or, where appropriate,  
 7 command and control statements from those with such  
 8 responsibilities, addressing, among other things, the  
 9 very issues set out in sub-paragraph (a).

10 The inquiry legal team has written to all relevant  
 11 core participants setting out the detail of what those  
 12 statements should contain. Further requests for  
 13 clarification have been made, where appropriate,  
 14 following the receipt of drafts. Accordingly, we as CTI  
 15 are satisfied that this information, the information  
 16 sought in sub-paragraph (a), will be available to the  
 17 inquiry in the form of witness statements signed by  
 18 appropriate persons and containing a statement of truth  
 19 and will be available to the core participants before  
 20 the start of the inquiry oral evidence hearings.

21 Accordingly, in our view, position statements are  
 22 not needed to address (a), would be duplicative and not  
 23 a good use of time or resources.

24 (b):  
 25 "A narrative of the core participants' performance

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1 with respect to the terms of reference."

2 CTI's position is that the appropriate time and form  
 3 for this information to be provided is in opening  
 4 statements by the relevant core participants. Sir, we  
 5 invite you to state in terms that you would be and would  
 6 expect to be assisted by such information in a written  
 7 opening statement by every relevant core participant.

8 We submit that such an opening statement should be  
 9 made in writing, in good time prior to the start of the  
 10 evidential hearings, and supplemented or developed  
 11 orally by any core participant who wishes to.

12 We recognise in making this submission that Rule 11A  
 13 of the Inquiry Rules is expressed as "may" and is not  
 14 therefore expressly mandatory. Furthermore, we  
 15 acknowledge that Rule 11A is silent as to the content of  
 16 any such opening statement.

17 However, every core participant who has submitted  
 18 that a position statement is not necessary or  
 19 appropriate has also asserted a determination to assist  
 20 this inquiry.

21 In those circumstances we anticipate that every one  
 22 of those core participants, upon hearing, sir, that you  
 23 would be assisted in this way, and that you expect such  
 24 assistance, will wish voluntarily to provide it.

25 We note that not every relevant core participant has

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1 made a submission on the issue of position statements.  
 2 However, we have no reason to suppose that those core  
 3 participants do not wish to assist you, sir, in this  
 4 way, should you so indicate.

5 Sir, before we move on to (c), may we indicate that  
 6 once you have ruled on this issue, which we anticipate  
 7 will not be today, if you rule in favour of our  
 8 submissions, we will invite you at that stage to set  
 9 a timetable in relation to opening statements. But  
 10 we will, of course, not do so until we know the effect  
 11 of your ruling.

12 Sub-paragraph (c) in Mr Weatherby's list:  
 13 "Learning since the incident in question."

14 As everyone knows, over two and a half years have  
 15 passed since the bombing. It is, in our view,  
 16 inconceivable that in that time each relevant core  
 17 participant, by which we mean state and non-state core  
 18 participants, will not have conducted an internal review  
 19 of their procedures in order to seek to improve.

20 We take the view that you will be assisted by  
 21 a witness statement under a statement of truth from  
 22 a senior employee of each relevant core participant  
 23 setting out the changes which have been made to policies  
 24 and procedures in light of the internal reviews that  
 25 must have been conducted.

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1 Given that this information will already be  
 2 available to each organisation now, and in some cases  
 3 has already been provided in witness statements provided  
 4 to the inquiry, we suggest that a free-standing witness  
 5 statement listing the changes should be submitted prior  
 6 to the start of the inquiry's oral evidence hearings.

7 Sir, we will again invite you to rule on this matter  
 8 in principle in the coming week or weeks.

9 Once more, once you've done so, we will again invite  
 10 you to set a timetable. So that is to say, if you rule  
 11 in favour of that submission on sub-paragraph (c), then  
 12 at that stage we would invite a timetable to be set.

13 Sub-paragraph (d):

14 "The performance of others, but only so far as it  
 15 affected them and was within their knowledge."

16 CTI's view is that you will be assisted, sir, in the  
 17 preparation of your report by this information.  
 18 However, we consider that it is premature at this stage  
 19 to seek it. The principal reason for this is that at  
 20 this stage, core participants do not have full  
 21 information in relation to the activities of others and  
 22 that includes, of course, that they don't yet have the  
 23 expert reports or all of them.

24 There exists a risk that that information, which any  
 25 given core participant does have, is based on

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1 a misunderstanding or misinterpretation by reason of not  
 2 having a complete understanding of the facts.

3 As such, any assertion made at this stage brings  
 4 with it the risk of obscuring or confusing matters  
 5 rather than illuminating them. We submit that the  
 6 inquiry evidential hearings will provide all core  
 7 participants an opportunity to develop the necessary  
 8 understanding in order to be able to provide meaningful  
 9 submissions on this point, by which we mean  
 10 sub-paragraph (d).

11 As such, the closing statement stage is therefore  
 12 the appropriate time for addressing this, should you  
 13 consider, sir, that you require assistance at that stage  
 14 on the point.

15 That is what we propose to say about position  
 16 statements or their replacement at this stage.  
 17 Ultimately, as we've submitted a number of times now,  
 18 it is a matter for you to decide what will best enable  
 19 you to carry out the search for truth that we know you  
 20 intend to undertake.

21 Sir, having made our submissions, we will invite  
 22 submissions first from the families -- we suggest  
 23 Mr Weatherby to go first -- followed by other family  
 24 representatives, followed by any other core  
 25 participants.

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1 SIR JOHN SAUNDERS: Mr Weatherby, as ever, I'm grateful for  
 2 your written submissions about this, which clearly I've  
 3 read.

4 MR WEATHERBY: Thank you very much.

5 Can I follow that by expressing gratitude for the  
 6 clear submissions of your team and the clear exposition  
 7 of them by Mr Greaney that we've just heard, which will  
 8 greatly shorten what I have to say and probably what  
 9 others have to say as well.

10 We received those submissions quite late, only last  
 11 evening. I have spoken to those who represent all of  
 12 the families and I anticipate what I'm about to say has  
 13 the support of all of the family teams, but of course  
 14 they can follow and confirm or speak otherwise.

15 Can I just make clear what position statements are  
 16 just so that everybody fully understands them. Position  
 17 statements are a request made by the inquiry for full  
 18 and frank institutional narratives or statements of what  
 19 the particular core participants' position is with  
 20 respect to the terms of reference and the matters  
 21 relating to the terms of reference. It is a call to  
 22 candour which is designed to enhance the ability of the  
 23 inquiry itself to undertake its task and to do so as  
 24 efficiently and as expeditiously as possible.

25 But it is also a key point, a key factor in respect

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1 of the families' confidence in the process. If the  
2 families perceive that all of the public authorities and  
3 the organisational core participants are genuinely  
4 trying to assist the inquiry and being full and frank in  
5 what they provide in advance to the inquiry in order to  
6 assist it doing its job then that will obviously enhance  
7 their confidence in the process.

8 Your counsel has come up with a proposal which  
9 provides for a significant degree of that which we have  
10 contended for, and given the stage this inquiry has  
11 already reached, and in recognition that this is  
12 a developing area, we take the view that the proposals  
13 of counsel to the inquiry can be made to work even if  
14 they don't address everything that we have sought.

15 We make that submission subject to particular points  
16 or caveats. The first is that we submit that the three  
17 statements that Mr Greaney referred to, which are set  
18 out at paragraphs 20 to 22 of his submissions, should be  
19 provided by each core participant at a minimum of  
20 six weeks before the start date for the inquiry hearings  
21 and disclosed to the family teams and others.

22 Secondly, we respectfully submit that it should be  
23 made clear to the institutional and organisational core  
24 participants that full cooperation is required, albeit  
25 that this is cast in a voluntary way.

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1 The term "a narrative of the core participants'  
2 performance with respect to the terms of reference"  
3 should be viewed as a call to be comprehensive and that  
4 those signing off these statements or providing the  
5 instructions for those statements should have well in  
6 mind the force of the dicta of Lord Justice Singh in the  
7 Hoareau case, which we set out in our submissions at  
8 paragraph 13. It is a short passage, but I want to read  
9 it into the record today:

10 "The duty of candour and cooperation which falls on  
11 public authorities, in particular on Her Majesty's  
12 Government, is to assist the court with full and  
13 accurate explanations of all the facts relevant to the  
14 issues which the court must decide. It would not  
15 therefore be appropriate, for example, for a defendant  
16 simply to offload a huge amount of documentation on the  
17 claimant and ask it, as it were, to find the needle  
18 in the haystack. It is a function of the public  
19 authority itself to draw the court's attention to  
20 relevant matters.

21 "As counsel for the respondent put it at the hearing  
22 before us to identify 'the good, the bad and the ugly'.  
23 This is because the underlying principle is that public  
24 authorities are not engaged in ordinary litigation,  
25 trying to defend their own private interests, rather

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1 they are engaged in a common enterprise with the court  
2 to fulfil the public interest in upholding the rule of  
3 law."

4 That dicta was, of course, said in a slightly  
5 different context, judicial review proceedings, but  
6 nevertheless the public interest in upholding the route  
7 of law in the sense expressed by Lord Justice Singh is  
8 what underpins the whole issue of position statements.

9 No doubt all the lawyers in the room know what that  
10 means, but it's important to spell it out. It means  
11 that core participants should include all key points,  
12 including those which are unfavourable to their own  
13 interests; the good, the bad and the ugly.

14 With respect to the fourth category that Mr Greaney  
15 referred to, "Comment on the performance of other CPs",  
16 we note the points that he has made. We do not press  
17 the point at this stage, save to indicate that in our  
18 view it will be necessary for core participants to make  
19 some comment regarding other core participants where  
20 their actions or omissions impacted on their own  
21 particular performance.

22 Let me just provide a brief example of that, Greater  
23 Manchester Police and the Fire and Rescue Service with  
24 respect to criticisms levelled at the latter in the  
25 Kerslake report. It is a matter of public record, that

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1 an ex-senior officer of the Fire and Rescue Services has  
2 indicated his view, which no doubt the inquiry will  
3 carefully consider at a later stage, that it wasn't the  
4 Fire and Rescue Service but it was Greater Manchester  
5 Police that failed.

6 It would be important, therefore, one would imagine,  
7 for each of those core participants to address those  
8 issues within their own position statement with respect  
9 to the performance of their own functions. We give that  
10 merely as one example.

11 So we commend the counsel to the inquiry compromise,  
12 if that's what it's properly to be styled as, for the  
13 reasons stated, but with those two caveats that I have  
14 just adverted to.

15 Before I give way to others, can I make the point  
16 that it has not gone unnoticed by our families that all  
17 the families are united in seeking candour and seeking  
18 position statements and all of the institutional and  
19 corporate core participants who have engaged in the  
20 argument so far have opposed them to one degree or  
21 another. They're not all the same, but they're opposing  
22 to one degree or another.

23 It seems to us that it is unnecessary for us to  
24 argue the point, but we make it clear that in seeking  
25 position statements the families are simply seeking

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1 answers, they're simply seeking the maximum frankness  
2 and candour by public authorities and organisations with  
3 responsibility for public safety.

4 Contrary to some of the submissions that have been  
5 made in writing, asking for candour is not adversarial,  
6 it is not in any sense contrary to the statutory regime,  
7 and it is not an outlier idea or a marginal interest, as  
8 has been referred to by at least one of the core  
9 participants.

10 The clamour for candour in inquiries has come from  
11 other bereaved groups, including those involved in  
12 Hillsborough and Grenfell disasters. The Mayor of  
13 Manchester, who has been a standard-bearer for duty of  
14 candour, gained cross-party sponsorship for legislation  
15 he introduced into Parliament to compel core  
16 participants to provide material that would include  
17 position statements and the main bereaved charity  
18 INQUEST has a statutory duty of candour and position  
19 statements as key campaigning priorities on behalf of  
20 the bereaved more generally.

21 Inquiries are not a jigsaw where the chair is  
22 required to put all the pieces together without  
23 assistance. Those who provide the material will know  
24 what their procedures are, they will have conducted  
25 their own reviews, and they will have an idea what they

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1 did well and what they failed to do.

2 The public interest demands that this process is not  
3 treated as some kind of game. Public authorities and  
4 those with responsibilities to the public should assist  
5 the inquiry to the maximum degree possible rather than  
6 to protect their own narrow institutional interests.

7 The families I represent -- and I think probably all  
8 of the families -- want the core participants to rise to  
9 this challenge and to comply not just with the letter  
10 but the spirit of the proposals that are now being  
11 advanced by your counsel.

12 Thank you.

13 SIR JOHN SAUNDERS: Thank you very much, Mr Weatherby.

14 Mr Cooper.

15 MR COOPER: I can be short. We support the submissions made  
16 by Mr Weatherby, who was kind enough to indicate to me  
17 the tenor of them, and indeed in doing so, of course,  
18 support the submissions and observations made by your  
19 counsel.

20 We simply have this to add: we made our own document  
21 and refer you, sir, to our own document dated  
22 10 January.

23 SIR JOHN SAUNDERS: Which I have read.

24 MR COOPER: I'm not going to refer to it in any great depth,  
25 but simply to emphasise, if it may assist you,

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1 paragraph 2.2.1 of our document and a couple of  
2 paragraphs leading on from it in terms of what really is  
3 required, and they're the terms of the bill that my  
4 learned friend has already referred to.

5 SIR JOHN SAUNDERS: Can you remind me of the divider number  
6 again? It's tab 7, I'm told.

7 MR COOPER: I'm grateful.

8 This is the bit that was so close, it seems, to  
9 actually being passed into law in May 2017, the Public  
10 Authorities Accountability Bill 2017. There are just  
11 two clauses there that we repeat in our written  
12 submissions that lay down the tenor of what we're asking  
13 for.

14 That's a reference we make now to our  
15 paragraph 2.2(iii). Clause 2 of that bill said:

16 "Public authorities and public servants and  
17 officials have a duty to assist court proceedings,  
18 official inquiries and investigations relating to their  
19 own activities, or where their acts or omissions are or  
20 may be relevant."

21 And then the final reference we make is our  
22 paragraph 2.2(iv), again from the bill:

23 "In discharging this duty, public authorities and  
24 public servants and officials shall act with proper  
25 expedition, act with transparency, candour and

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1 frankness, act without favour to their own position,  
2 make full disclosure of relevant documents and  
3 materials, set out their position on the relevant  
4 matters at the outset of the proceedings, inquiry or  
5 investigation, and further provide information and  
6 clarification as ordered by the inquiry."

7 The reason the bill didn't pass is because there was  
8 a general election called and all business there ended  
9 in Parliament, but we submit the tenor of the bill, in  
10 particular those two matters we've just cited to the  
11 court, are a helpful yardstick to you, sir, when  
12 considering our requests.

13 Thank you.

14 SIR JOHN SAUNDERS: Thank you, Mr Cooper.

15 Yes, Mr Gozem.

16 MR GOZEM: Sir, with the greatest of respect, it seems to us  
17 to matter little whether the documents that are to be  
18 supplied are called position statements or opening  
19 statements and closing statements. I would, if I may,  
20 with the greatest of respect, commend to you -- I think  
21 it's at tab 18 in the core bundle -- the submissions  
22 made by my learned friend Mr Robert Smith Queen's  
23 Counsel on behalf of, I think it's the North-west Fire  
24 Control.

25 In the circumstances, it's the content and the

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1 assistance to the inquiry that matters far more than the  
2 name, and we're therefore happy to endorse your  
3 counsel's submissions.

4 SIR JOHN SAUNDERS: I'm grateful, thank you.

5 MS McGAHEY: Sir, on behalf of the Government, may  
6 I emphasise that this is not a contest between candour  
7 and a lack of candour. Speaking for the Government, the  
8 Government has already provided a highly detailed  
9 corporate witness statement. We are making as much  
10 information as possible available to the families and  
11 we will continue to do so.

12 We recognise entirely the need to address the issues  
13 identified by Mr Weatherby Queen's Counsel, and it is in  
14 absolutely everybody's interests that lessons should be  
15 learnt that might save other lives in the future.

16 The only question is the correct and most efficient  
17 way of doing this, and we respectfully agree with  
18 counsel to the inquiry that position statements are not  
19 the way forward and the Government is content to support  
20 the suggestion made by counsel to the inquiry.

21 SIR JOHN SAUNDERS: Can I make clear that what we're  
22 discussing today, it would apply to closed hearings as  
23 well as open hearings. Of course, disclosure of what is  
24 put forward may be different, but I would certainly, if  
25 we go with what counsel to the inquiry is suggesting,

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1 have to make sure that they're applied across the board  
2 to all hearings.

3 MS McGAHEY: Yes, sir, we're willing to provide statements  
4 or information in whatever way you consider is most  
5 helpful in the context of whatever hearing is going  
6 heard.

7 SIR JOHN SAUNDERS: Thank you very much.

8 MR WARNOCK: Sir, may I just on behalf of the GMCA associate  
9 myself with what Ms McGahey has just said and also what  
10 we've just heard in the last submissions made on behalf  
11 of the families.

12 Sir, you will have seen from the GMCA's submission  
13 that it is fully committed to the fact that these  
14 inquiries should be conducted with candour and  
15 transparency and, sir, I hope you have seen that in the  
16 witness statements the GMCA has taken already.

17 We also agree with the families and with  
18 Mr Weatherby that the inquiry is likely to be assisted  
19 by the core participants setting out their positions on  
20 the issues he has identified.

21 Our only disagreement, and it's a small  
22 disagreement, is in the form and timing that that should  
23 take. In relation to that, we fully support the  
24 proposals put forward by your counsel to the inquiry.  
25 We consider that's much more likely to result in

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1 a helpful position being set out by the core  
2 participants and we fear that if we went down the  
3 statement of case type route, that may inadvertently  
4 lead to a more adversarial process.

5 SIR JOHN SAUNDERS: Thank you.

6 MR SMITH: May I address you on behalf of North-west Fire  
7 Control.

8 We agree that the question for you, sir, is that set  
9 out in your counsel's submissions: what will best enable  
10 you to discharge your responsibilities and how that is  
11 to be achieved?

12 We've considered with very great care the  
13 submissions that have been made by CTI and we are in  
14 agreement with them. They mirror effectively the  
15 submissions that we have made on behalf of North-west  
16 Fire Control.

17 I don't believe there's anything further we need to  
18 add.

19 SIR JOHN SAUNDERS: Do you mind if I just pose a particular  
20 issue or potential issue to you? I think in practice --  
21 this is unlikely to arise, but as you've heard from  
22 CTI -- the proposal is that a criticism of other core  
23 participants by one core participant would most properly  
24 come when we've heard all the evidence and that arises  
25 in closing submissions.

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1 What, of course, one wishes to avoid -- and I'm sure  
2 we would -- is something coming out in a closing  
3 submission which has never been mooted during the  
4 evidence and someone not having the opportunity to deal  
5 with potential criticisms.

6 I think the system can work, but one does of course  
7 rely on the good sense of everybody, that they need to  
8 be alert to the fact that simply bringing out  
9 a criticism at the very last moment in closing  
10 submissions will not be of enormous assistance to the  
11 inquiry.

12 MR SMITH: I would also submit that it is important that all  
13 core participants should remember their duty to put  
14 certain allegations where permitted to do so in order  
15 that the ground is already laid before that stage is  
16 reached.

17 SIR JOHN SAUNDERS: I'm saying that in the light of what was  
18 said in Hillsborough when this did appear to happen.

19 MR SMITH: Yes.

20 SIR JOHN SAUNDERS: And actually, the coroner there ruled  
21 there's no requirement to put one's case. But perhaps  
22 in that, as in other matters, it became perfectly  
23 obvious what was going on and what in fact was the case  
24 that was actually being put.

25 So my present view is that in practice it could all

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1 work out, but clearly one doesn't want things being  
 2 brought in as a surprise in closing submissions.  
 3 MR SMITH: Not at all, no, and by that stage, of course, the  
 4 opportunity to ventilate those issues properly in  
 5 evidence may have been lost.  
 6 SIR JOHN SAUNDERS: Absolutely. As long as we are all alert  
 7 to that. Thank you for dealing with that through me.  
 8 MS BARTON: On behalf of GMP, we agree with and support the  
 9 middle way that has been postulated by Mr Greaney on  
 10 behalf of CTI.  
 11 SIR JOHN SAUNDERS: Thank you.  
 12 Any other submissions? Mr Cooper?  
 13 MR COOPER: Sir, very briefly on the back of some of the  
 14 observations made and also recalling, hopefully  
 15 accurately, the observations made by counsel to the  
 16 Grenfell inquiry only a few days ago. The product there  
 17 was simply core participants blaming each other. That  
 18 may or may not be appropriate, I don't know, but I would  
 19 seek through you, sir, to implore that where blame  
 20 exchange is appropriate, then so be it. But hopefully  
 21 we do not have the same disappointment that counsel to  
 22 the Grenfell inquiry seemed to express only two days ago  
 23 of a constant blame exchange rather than an individual  
 24 assessment of their own position.  
 25 SIR JOHN SAUNDERS: Thank you. I make no comment on the

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1 Grenfell inquiry; it would be inappropriate for me to do  
 2 so.  
 3 MR FULLWOOD: Sir, may I just rise to confirm the position  
 4 of the ambulance service, which is that we also agree  
 5 with the proposals by your team. We think it is  
 6 workable and sensible and we will continue to do all  
 7 we can to assist the inquiry in its work.  
 8 SIR JOHN SAUNDERS: I'm grateful.  
 9 British Transport Police?  
 10 MS HOLLOS: Sir, likewise, we agree with the proposals made  
 11 by counsel to the inquiry and are keen to assist in any  
 12 way we can.  
 13 SIR JOHN SAUNDERS: I'm simply saying that because your  
 14 written representations were, or your leader's written  
 15 representations, or both, came in for some criticism  
 16 from Mr Weatherby.  
 17 MS HOLLOS: I understand, but we are keen to assist in the  
 18 way suggested by counsel to the inquiry.  
 19 MR ENGLISH: Sir, may I just add on behalf of SMG we also  
 20 support the proposals that have been made by your  
 21 counsel.  
 22 SIR JOHN SAUNDERS: Thank you.  
 23 MR GREANEY: So happily, a consensus appears to have  
 24 emerged.  
 25 SIR JOHN SAUNDERS: Yes. Mr Greaney, these proposals have

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1 been merged with the duty of candour to an extent.  
 2 MR GREANEY: Yes.  
 3 SIR JOHN SAUNDERS: The proposal is that everyone -- and  
 4 no one's argued with this -- would feel the duty of  
 5 candour applies to them and I would take that to be the  
 6 position unless anyone wishes to argue to the contrary.  
 7 MR GREANEY: Sir, I don't see anyone rising to indicate any  
 8 disagreement with what you have just said.  
 9 SIR JOHN SAUNDERS: Okay, thank you.  
 10 MR GREANEY: Sir, should we anticipate that you will give  
 11 what may now be a very short ruling on this particular  
 12 issue in due course?  
 13 SIR JOHN SAUNDERS: You will get a ruling in due course; how  
 14 short it is will depend on when I have looked at the  
 15 issues, but yes, I will try and keep it relatively brief  
 16 and clear.  
 17 MR GREANEY: I'm sure it will be as long as it needs to be.  
 18 SIR JOHN SAUNDERS: Thank you.  
 19 Submissions on the Fire Officer's Association  
 20 MR GREANEY: Sir, can we turn then to issue 5, which would  
 21 be a very short issue? The Fire Officers' Association,  
 22 the FOA, advanced two sets of core participant  
 23 applications, one on behalf of five named individual  
 24 fire officers, and another on behalf of the FOA as an  
 25 organisation.

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1 We've set out the position of CTI in writing in  
 2 detail, but in short we consider that you should not  
 3 rule today but instead should make a decision following  
 4 the completion of disclosure when the position will be  
 5 sufficiently clear.  
 6 Mr Browne, who represents the FOA and the  
 7 individuals, helpfully and realistically accepts that  
 8 analysis and does not press for a ruling today.  
 9 Accordingly, sir, it does not seem to us that  
 10 submissions from others are likely to be of benefit on  
 11 this issue, but of course we don't seek to shut anyone  
 12 out if they have a submission to make.  
 13 SIR JOHN SAUNDERS: Mr Browne?  
 14 MR BROWNE: I'm grateful, sir. The position is the  
 15 application is not withdrawn. We gratefully accept the  
 16 suggestion, the compromise put forward by your counsel,  
 17 but in order for that to be effective, clearly the  
 18 appropriate undertakings will be given, but there has to  
 19 be disclosure of all relevant material that touches upon  
 20 matters that affect those applications.  
 21 We would encourage cooperation from the secretariat,  
 22 from CTI and from BLM, who represent the Combined  
 23 Authority in that regard.  
 24 SIR JOHN SAUNDERS: Mr Browne, you'll find no disagreement  
 25 on that with me.

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1 It seems to me that the individual officers who you  
 2 represent who will be giving evidence, no doubt, need to  
 3 know the disclosure and anything to do with the matters  
 4 which come within the ambit of their evidence and all  
 5 contemporary documents and matters such as that.

6 MR BROWNE: I'm very grateful.

7 MR WARNOCK: Sir, may I just indicate on behalf of GMCA and  
 8 BLM that the approach set out by my learned friend,  
 9 counsel for the inquiry, is indeed the approach that BLM  
 10 are following with the Fire Service witnesses.

11 SIR JOHN SAUNDERS: Thank you. I'm grateful.

12 MR GREANEY: We're grateful for the clarification from GMCA.

13 So there's no doubt about it, the route by which  
 14 individuals should gain access to the relevant materials  
 15 is through the GMCA and their lawyers, BLM, and not  
 16 directly from the inquiry.

17 SIR JOHN SAUNDERS: No. Thank you.

18 Submissions on timetabling

19 MR GREANEY: The next issue, issue 6, I think, hearing  
 20 timetable and structure. Here again, we simply seek to  
 21 provide information to the core participants. That  
 22 information is as follows.

23 A draft structure document will be distributed to  
 24 core participants by 31 January, so that is to say by  
 25 the end of this week. Essentially, that will be

1 a document that sets out the order in which we propose  
 2 that the inquiry oral evidence hearings, the particular  
 3 topics, will be dealt with.

4 That will be supplemented by draft witness lists,  
 5 which we will start circulating on a rolling basis by  
 6 the same date, that's to say by the end of this week,  
 7 and ultimately at a later stage we anticipate providing  
 8 a witness plan for the entirety of the oral evidence  
 9 hearings.

10 Sir, may we say that we are mindful of your  
 11 encouragement to ensure that momentum is retained  
 12 notwithstanding that the date has gone back.

13 It goes without saying that it is vital that the  
 14 oral evidence hearings are full and thorough; no one  
 15 would suggest to the contrary, we are certain.

16 Our provisional estimate is that the oral evidence  
 17 hearings will take about four months. That is on our  
 18 current view an ambitious but, we consider, realistic  
 19 time estimate.

20 So far as the practical arrangements each week are  
 21 concerned, we submit that the inquiry should sit Monday  
 22 to Thursday, 10 am to 5 pm, although we make plain that  
 23 we cannot exclude that it will become necessary to sit  
 24 on Fridays also in order to complete particular evidence  
 25 or if the oral evidence hearings fall behind schedule.

1 Finally, we submit also that the hearings should not  
 2 sit for a two-week period over the summer, with a last  
 3 sitting day before the break of Thursday 23 July, and  
 4 a first sitting day after the break of 10 August.

5 Sir, those indications, if you agree with them,  
 6 will, we hope, enable people to make their plans.

7 SIR JOHN SAUNDERS: Do people agree with it? Do you agree  
 8 it's the best use of the time bearing in mind people do  
 9 have preparation work to do, they don't simply come into  
 10 the inquiry without doing a lot of preparation  
 11 beforehand? Also it assists me to assimilate the  
 12 information during the week if we're not sitting for one  
 13 day of the week on a rolling process to try and start to  
 14 prepare my report as we go on.

15 Is everybody in agreement with the proposal or would  
 16 anyone like to make a counterproposal?

17 MR WEATHERBY: Can I just say that we certainly agree and  
 18 we will engage on a rolling basis with your team in  
 19 terms of the actual witness lists and proposals, as  
 20 you'd expect.

21 The four-day working week actually saves time.  
 22 Experience in other inquiries and other processes -- the  
 23 experience has been that in fact it means that the  
 24 four days are used much more efficiently.

25 SIR JOHN SAUNDERS: Mr Weatherby, I'm quite certain for

1 those involved it'll be a six-day working week --

2 MR WEATHERBY: Yes.

3 SIR JOHN SAUNDERS: -- and the preparation does -- sometimes  
 4 people think lawyers just come into court and do things  
 5 off the top of their head. A lot of preparation goes  
 6 into it. The more preparation, my experience is, the  
 7 better it tends to be done, so that's an advantage for  
 8 everybody. I am keen that the oral hearings should not  
 9 last more than four months. I am as confident as I can  
 10 be that that can be done, provided we actually maintain  
 11 focus.

12 It's going to be easy to miss the wood for the trees  
 13 in a case like this. So we not only need to see what is  
 14 relevant, but is it actually going to help deciding the  
 15 issues I have to decide as well.

16 MR WEATHERBY: Yes.

17 SIR JOHN SAUNDERS: I'm sure people won't, but it's  
 18 obviously important that we do apply our minds early on  
 19 to what is actually relevant to the issues to determine.

20 MR WEATHERBY: We would certainly endorse those comments.  
 21 The families obviously want as full an inquiry as  
 22 possible --

23 SIR JOHN SAUNDERS: Absolutely, of course.

24 MR WEATHERBY: -- but neither do they want it to go on any  
 25 longer than necessary.

1 SIR JOHN SAUNDERS: We will not miss anything which is  
 2 significant and relevant, I can assure everybody of  
 3 that, but equally there are some things which come up  
 4 which may not be strictly relevant and that needs to be  
 5 considered as well.

6 MR WEATHERBY: Indeed.

7 SIR JOHN SAUNDERS: Thank you.

8 MR COOPER: We have no further observations to make.

9 SIR JOHN SAUNDERS: Thank you, Mr Cooper.

10 MR GREANEY: Sir, we'll move on to the final three or four  
 11 topics .

12 May I indicate for the benefit of the persons doing  
 13 the transcribing that I think well finish the oral  
 14 submissions by 1 o'clock, which will be point at which  
 15 we would take a break, if that is acceptable.

16 SIR JOHN SAUNDERS: It seems to be acceptable.

17 Submissions on Disclosure and Experts

18 MR GREANEY: Sir, the next topic is an update on disclosure  
 19 and experts.

20 Sir, as you and all core participants know, STI have  
 21 regularly circulated disclosure updates. The most  
 22 recent substantive update on disclosure was provided to  
 23 core participants on 18 December. We don't propose to  
 24 repeat the content of that note, but instead we'll  
 25 provide information about developments in the six weeks

1 since, both in relation to the disclosure of documents  
 2 and in relation to expert evidence.

3 We have received, during that six-week period,  
 4 a further 500 documents running to 3,000 pages, meaning  
 5 that the inquiry has to date received 28,600 documents,  
 6 running to 313,000 pages.

7 The new material since 18 December includes  
 8 documents provided by the Manchester College, Security  
 9 Industry Authority, GMP, NWAS, and statements provided  
 10 at the request of the inquiry.

11 GMP have recently provided and are continuing to  
 12 provide a substantial body of criminal investigation  
 13 material. There have, since 18 December, been three  
 14 tranches of further disclosure released to core  
 15 participants: first, a further set of materials provided  
 16 to the family teams only on 9 January, including further  
 17 DVR materials; two, tranche 19, which was disclosed to  
 18 all core participants on 10 January; and thirdly,  
 19 tranche 20, which was disclosed to all core participants  
 20 again on 27 January.

21 It is intended to release a further tranche of  
 22 material to all core participants a little later this  
 23 week.

24 That means that core participants have now received  
 25 in excess of 6,900 documents, a total of 69,000 pages,

1 and STI intends to provide a further substantive update  
 2 on disclosure, certainly within the next 14 days.

3 Next, an issue that we know the core participants  
 4 and particularly the bereaved families are concerned to  
 5 know the position in respect of.

6 On 27 January, that's to say yesterday, at  
 7 17:47 hours, STI circulated an index of corporate and  
 8 command and control statements disclosed to the inquiry.  
 9 A number of statements are still going through the  
 10 sensitivity checking process and will be disclosed on  
 11 the Magnum system shortly.

12 The inquiry legal team continues to raise Rule 9  
 13 requests for statements and will continue to do so after  
 14 today's date. STI will continue to update core  
 15 participants periodically on the progress that is made.

16 So far as the inquiry experts are concerned, the  
 17 position is as follows.

18 The policing experts, Ian Dickinson, Ian Sorrell and  
 19 Scott Wilson, completed their overview report in July of  
 20 last year and that is available to all core participants  
 21 on Magnum.

22 The experts were then instructed on 25 October to  
 23 prepare a further report considering the police  
 24 emergency preparedness for a mass fatality event and the  
 25 police response to the events at the arena.

1 Their report was originally due -- that is to say  
 2 this further report -- to be lodged in draft with you,  
 3 sir, by 19 February. But as STI explained in an email  
 4 to all core participants towards the end of last year,  
 5 you have granted, for good reason, an extension for  
 6 completion of the draft report to 9 March.

7 The ambulance experts, Mike Herriot and  
 8 Chris Cooper, completed their overview report in August  
 9 of last year and, again, that report is available to all  
 10 core participants .

11 Those experts were instructed on 25 October to  
 12 prepare a further report to consider the ambulance  
 13 emergency preparedness for a mass fatality event and the  
 14 ambulance first aid response to the events at the arena.  
 15 That report is due to be lodged with you by 19 February.

16 The fire expert, Matt Hall, again completed an  
 17 overview report. He did so in October last year.  
 18 That too is available to all core participants . He too  
 19 was instructed on 25 October to prepare a further report  
 20 to consider the fire emergency preparedness for a mass  
 21 fatality event and the Fire and Rescue Service response  
 22 to the events at the arena.

23 Matt Hall is assisted for his further report by  
 24 a researcher whose name is John Laurie.

25 Once the final copy of the further reports of the

1 emergency response experts have been provided to  
2 the chairman, that is to say to you, sir, they must be  
3 provided to HMG for the purposes of what's been  
4 described as a sensitivity check.

5 The purpose of that check -- and we accept that  
6 there is a proper purpose for that check, and indeed for  
7 the other checks that are carried out, as Ms McGahey  
8 indicated earlier -- the purpose of that check on those  
9 reports will be to identify whether there is anything  
10 said in any report about responding to a terrorist  
11 incident that is operationally sensitive.

12 If any report contains such information, it will  
13 need to be provisionally redacted, pending an  
14 application for a restriction order, but every effort  
15 will be made to ensure that core participants have  
16 access as far as possible to relevant information and  
17 comments made by the experts.

18 HMG is aware of the deadlines for receipt of the  
19 expert reports and the need to review them as swiftly as  
20 possible so as to ensure they can be disclosed to all  
21 core participants promptly.

22 Next in terms of areas of expertise, Richard Latham  
23 and David BaMaung are security experts and have been  
24 appointed to assist you, sir, to matters relating to  
25 security arrangements within and outside the arena.

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1 They were instructed on 12 November and their draft  
2 report is due to be received by you on 28 February.

3 As with other reports, it will need to be checked  
4 for sensitivity by HMG before it is disclosed to the  
5 core participants.

6 Next, Dr Matthew Wilkinson is a senior research  
7 fellow in Contemporary Islam at the School of Oriental  
8 and African Studies at the University of London. He was  
9 instructed on 27 November to prepare an overview report  
10 on the general issue of radicalisation and Islamist  
11 extremism. That report is due to be provided to you in  
12 draft by 2 March, subject again to a sensitivity check.

13 In due course it is likely that Dr Wilkinson will be  
14 asked to prepare a further report on matters relating  
15 specifically to the radicalisation of Salman Abedi.

16 The overview report of the blast wave experts, the  
17 experts being formed by a panel led by Professor  
18 Anthony Bull, their report was provided to the bereaved  
19 families in October last year and to core participants  
20 the following month, November. Again, it is available  
21 now to all core participants on the Magnum system.

22 Those experts are currently reviewing their report  
23 in the light of the provision of video and witness  
24 statements and an update will be circulated to core  
25 participants as soon as that is possible.

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1 The forensic pathologists, Professor Crane and  
2 Dr Shepherd, were provided with a copy of the report  
3 that the blast wave experts had provided and were asked  
4 to comment on any areas of agreement or disagreement.

5 A copy of the letter of the forensic pathologists  
6 providing those comments, which is dated 10 November  
7 2019, is available to all core participants on the  
8 Magnum system.

9 So that, sir, coupled with the update note of STI of  
10 18 December, we hope, provides a comprehensive overview  
11 at any rate of where we currently are. If anyone wishes  
12 to make submissions, we invite them now.

13 MR COOPER: Very briefly. Not so much a submission, but an  
14 observation.

15 We're aware that at the conclusion of the trial  
16 we're expecting a significant amount of disclosure.  
17 I presume, if that disclosure -- we've not seen it and  
18 I understand why we're not getting some of it. If that  
19 disclosure may need to be provided to experts, I know  
20 not. But I'm sure the inquiry and my learned friend  
21 particularly will have factored that time pressure into  
22 any timetable as far as experts are concerned.

23 MR GREANEY: Yes, I can confirm that we have.

24 SIR JOHN SAUNDERS: Thank you.

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#### 1 Submissions on Venue

2 MR GREANEY: I'm looking to see if anyone else has any  
3 submissions and it doesn't look as if they do, so I'll  
4 turn therefore to the next topic, the eighth topic:  
5 update on venue. Again, it involves simply the  
6 provision of information.

7 By an email dated 15 July 2019, STI provided an  
8 update on progress on venue. They indicated that work  
9 was underway at that stage with a view to converting an  
10 entire floor of the Manchester Magistrates' Court for  
11 our purposes.

12 Since then, much work has been done to redesign the  
13 space at the Magistrates' Court to ensure it is fit for  
14 the inquiry's purposes. The building works themselves  
15 commenced on 16 January of this year and they're on  
16 schedule to be completed on 26 February.

17 Thereafter, a short time will be required for the  
18 installation of the technological equipment needed for  
19 the overall evidence hearings and that is expected to  
20 take no more than two weeks. Hence the courtroom would  
21 have been ready for a start date on 6 April if it had  
22 been possible to retain that date, which has not, as  
23 you've indicated, proved possible.

24 You have, sir, as we indicated at the hearing on  
25 22 November, also secured space in a conference centre

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1 very close to the Magistrates' Court; it is no more than  
 2 five minutes' walk. This will provide additional  
 3 facilities for the bereaved families. The area will  
 4 provide breakout and meeting rooms for families. It  
 5 will have a live stream of the evidence and access to  
 6 counselling and support services, which will also be  
 7 available in the courtroom itself.

8 The inquiry legal team, or at any rate some members  
 9 of the team, have visited those premises. In our view,  
 10 they are a large, but warm and welcoming space which we  
 11 believe will provide excellent facilities for the  
 12 families, and arrangements will be made for the bereaved  
 13 families to visit both venues -- that is to say the  
 14 courtroom and their own facilities -- well before the  
 15 start of the oral evidence hearings once work on them  
 16 has been completed.

17 Sir, again, we provide that by way of information  
 18 and I look around to see if anyone has any particular  
 19 submission they wish to make.

20 Once again, no one does. I'll therefore move on.

21 Submissions on Live Streaming

22 MR GREANEY: Live streaming of the hearings. I will  
 23 indicate why this arises as an issue at all before  
 24 setting out what our position is today.

25 Section 18 of the Inquiries Act requires that you,

1 sir, must take such steps as you consider reasonable to  
 2 secure that members of the public, including reporters,  
 3 are able to attend the inquiry or to see and hear  
 4 a transmission of proceedings.

5 Importantly, this is subject to any restriction  
 6 orders or notices that may be imposed. CTI's  
 7 provisional view is that the oral evidence hearings must  
 8 be live streamed and we know that that accords with the  
 9 views of others.

10 This means that the evidence will be available to be  
 11 watched on a link via the inquiry's website for whoever  
 12 wished to follow the proceedings. Not only will that  
 13 ensure compliance with section 18, it will also enable  
 14 any person who wishes to follow the proceedings but is  
 15 unable to attend the hearing venue or does not feel able  
 16 to do so to remain engaged.

17 However, we recognise that it may not be appropriate  
 18 for the evidence of some witnesses to be live  
 19 streamed -- for example, because it's sensitive or  
 20 distressing -- and moreover we recognise that it is  
 21 likely to be necessary, as with other public inquiries,  
 22 that any live streamed evidence be subject to a short  
 23 delay before it is broadcast. That will, for example,  
 24 ensure compliance with any restriction orders or notices  
 25 that are in place.

1 The inquiry legal team had initially considered that  
 2 this topic should be the subject of further  
 3 consideration at this hearing. However, our view on  
 4 reflection is that the issue is much better addressed  
 5 once the issue of restriction orders has been resolved,  
 6 which ought to occur following the hearing listed for  
 7 28 February. Accordingly, we intend to deal with this  
 8 issue, live streaming, further, either at that hearing  
 9 on 28 February or, more probably, at the hearing listed  
 10 to take place currently on 20 March.

11 I can see Mr Cooper wishes to make a statement.

12 MR COOPER: If I can, just on this, and I've had specific  
 13 instructions from a number of those that I represent on  
 14 the point I'm going to raise, and that considers the  
 15 live streaming of pen portraits.

16 A number of those we represent are concerned that  
 17 they should not be live streamed. I can develop this  
 18 submission in writing if need be but I flag it now.

19 I would like on their behalf to have a resolution of  
 20 that issue, of course not today, but as soon as  
 21 possible, because a number of steps are being taken to  
 22 formulate and produce helpful pen portraits in a number  
 23 of forms and a number of individuals who may or may not  
 24 participate in that would like the assurance as soon as  
 25 possible that what they say or how they say it and in

1 what form would not be available for recording or  
 2 broadcast.

3 I can develop that submission. I realise now is not  
 4 necessarily the time to develop it in depth, but I flag  
 5 it now as an important issue as far as some of those we  
 6 represent.

7 SIR JOHN SAUNDERS: Okay, thank you very much.

8 MR GREANEY: Sir, without seeking any ruling or indication  
 9 from you at this stage, it seems to us on a provisional  
 10 basis that the views of the families on this issue ought  
 11 to be accorded considerable weight, to say the least.

12 Submissions on Pen Portraits

13 MR GREANEY: We turn therefore to the final issue, namely  
 14 pen portraits, and we are on schedule to conclude the  
 15 oral submissions before 1 pm.

16 On 20 December last year, the inquiry legal team  
 17 circulated a draft proposal on what was described in the  
 18 document as background evidence concerning the deceased.  
 19 Those core participants who have responded to that  
 20 aspect of our submissions have generally been  
 21 supportive, in fact we might say highly supportive. The  
 22 inquiry legal team has however been asked to consider  
 23 two matters by those representing bereaved families.  
 24 Those two matters are as follows.

25 First, that the pen portraits should be heard at the

1 same venue as the other evidence in the case so as to  
 2 ensure that their importance is fully understood. The  
 3 inquiry legal team agrees entirely that the centrality  
 4 of the pen portraits must be recognised by all and  
 5 everything possible done to achieve that. We raise only  
 6 the fact that this submission by the families has  
 7 necessarily been made at a time at which the families  
 8 have not yet seen either the hearing venue or the  
 9 facilities for them that are nearby.

10 Once the families have done so, we invite them to  
 11 consider whether their facilities may provide a venue  
 12 which will preserve the dignity of the commemorative  
 13 hearings, ensure the importance of the evidence is fully  
 14 understood, and provide a large and comfortable venue  
 15 for all who wish to attend.

16 So sir, we hope that what we are submitting is  
 17 clear. We are far from arguing against the request that  
 18 has been made, but we would simply invite the bereaved  
 19 families to reflect once they have seen the facilities  
 20 available for them. In those circumstances, we propose  
 21 this issue should be considered again at the hearing  
 22 either on 28 February or 20 March.

23 Secondly, the families have requested that the  
 24 section of evidence that we are currently discussing  
 25 should be referred to as pen portraits which are heard

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1 during a phase of commemorative hearings and we for our  
 2 part intend to describe them in that way from now on.

3 Sir, that is all we wish to say about pen portraits  
 4 at this stage.

5 SIR JOHN SAUNDERS: Thank you.

6 MR COOPER: Sir, I'm grateful to Mr Greaney. Again, these  
 7 are matters that arose as a result of our submissions --  
 8 I'm grateful to my instructing solicitor for this -- and  
 9 particularly in our document which you've got, dated  
 10 22 January.

11 We obviously hear what Mr Greaney, as always,  
 12 helpfully says and we'll consider the point to see  
 13 whether the matter needs to be addressed again, but the  
 14 central nature of this evidence is absolutely vital --

15 SIR JOHN SAUNDERS: I understand.

16 MR COOPER: -- which of course you understand.

17 SIR JOHN SAUNDERS: Mr Weatherby, do you want to add to  
 18 that?

19 MR WEATHERBY: I agree with that. I think it's a sensible  
 20 suggestion that the families should see the venue and  
 21 then further submissions can be made.

22 SIR JOHN SAUNDERS: Thank you, I'm grateful.

23 MR GREANEY: Sir, I don't invite any, but I ask whether  
 24 you have any observations that you wish to make about  
 25 the matters we have just addressed.

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1 SIR JOHN SAUNDERS: I don't, thank you very much. I'm very  
 2 grateful for the clarity of the submissions we've had  
 3 today.

4 You're going to have a discussion as to what  
 5 reporting restrictions need to apply to what's happened  
 6 today. I, of course, remind the press they are governed  
 7 basically by the reporting restrictions from the judge  
 8 at the Old Bailey, which is their responsibility to  
 9 follow.

10 Can I just ask: do any members of the press want to  
 11 make any representations before the matters are  
 12 considered? I'll give you an opportunity afterwards as  
 13 well.

(Pause)

15 I will assume that you wish to be able to report as  
 16 much as you are able to report. No doubt that will be  
 17 considered.

18 MR GREANEY: Sir, it may assist -- it will certainly assist  
 19 me in talking to numerous core participants -- if  
 20 I indicate my own view about the position before you  
 21 rise.

22 It seems to me that there could be no sensible  
 23 objection to there being reporting of the fact that the  
 24 inquiry will start on 15 June to provide time for the  
 25 trial of Hashem Abedi to conclude and all relevant

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1 material to be provided by the inquiry to core  
 2 participants. That would avoid making any reference to  
 3 delays, which in our view is desirable. Reporting could  
 4 also include the fact that a transcript of the trial is  
 5 to be obtained and provided to core participants, if  
 6 that was thought to be remotely newsworthy, and beyond  
 7 that, case management issues had been considered by the  
 8 core participants with you, sir, but we are uncertain  
 9 that anything beyond that can safely be reported given  
 10 the particularly sensitive stage the trial of  
 11 Hashem Abedi is at.

12 SIR JOHN SAUNDERS: Right. I don't know whether you're  
 13 going to speak to any representatives of the press. It  
 14 may be a good idea to do that.

15 MR GREANEY: I will.

16 SIR JOHN SAUNDERS: Of course I will allow them to address  
 17 me if they wish to do so now or perhaps if someone can  
 18 talk to the press about it.

19 MR GREANEY: I will talk to them personally.

20 SIR JOHN SAUNDERS: I'm not sure we have a representative of  
 21 the Crown Prosecution Service here to discuss those  
 22 matters now.

23 MR GREANEY: I've been in communication with Mr Penny about  
 24 one aspect.

25 SIR JOHN SAUNDERS: How long would you like to sort those

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1 matters out?  
 2 MR GREANEY: Ten minutes.  
 3 SIR JOHN SAUNDERS: Right. Thank you.  
 4 Again, as always, if people would allow the families  
 5 to leave first, that would be of help after we have  
 6 dealt with those matters. Of course, you don't have to  
 7 remain for the reporting restrictions matters to be  
 8 considered.

9 I'll now rise and please tell me when you're ready.  
 10 Thank you.

11 (12.55 pm)

(A short break)

13 (1.20 pm)

14 MR GREANEY: Sir, I've had discussions with all of those  
 15 I consider I need to have discussions with, which  
 16 includes a representative of the Crown Prosecution  
 17 Service, namely the reviewing lawyer, and also the  
 18 representatives of the press.

19 The press consider that it would be helpful if  
 20 I were to indicate paragraph by paragraph, by which  
 21 I mean sub-paragraph or paragraph 1 of our written  
 22 submissions, what we consider can and cannot be  
 23 reported.

24 So I propose to do that and I'll read out which each  
 25 sub-paragraph is in case the press don't have any

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1 submissions immediately to hand.  
 2 Paragraph (a) is reporting of the preliminary  
 3 hearing. No one is suggesting that it would be remotely  
 4 appropriate to report any of the discussion that took  
 5 place about why reporting restrictions had been made  
 6 previously. So paragraph 1(a) absolutely inappropriate  
 7 to report any of that.

8 Paragraph 1(b) is the start date for the inquiry's  
 9 oral evidence hearings. As I indicated earlier, our  
 10 view is that what can be reported is as follows: the  
 11 inquiry will start on 15 June 2020 in order to provide  
 12 time for the trial of Hashem Abedi to conclude and to  
 13 enable the inquiry to provide core participants with all  
 14 relevant material.

15 It would not, in our view, be appropriate for words  
 16 such as "delays" to be used. That is because, at the  
 17 very least, it would result in speculation, which might  
 18 generate the impression that the delays were the fault  
 19 of Hashem Abedi, which would be prejudicial or capable  
 20 of being prejudicial to his trial. So any reporting  
 21 beyond the phrase that I've used gives rise to the  
 22 responsibility that there could be a contempt of court  
 23 and/or a breach of the section 4(2) order that has been  
 24 made in the criminal proceedings.

25 1(c). The proposal of the inquiry legal team for

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1 the distribution of transcripts of the trial of  
 2 Hashem Abedi. No problem with the reporting of what was  
 3 said in that regard.

4 The same goes for 1(d), position statements and for  
 5 1(e), if that's of any interest to anyone, the  
 6 application by the Fire Officers' Association and five  
 7 named current or retired fire officers for core  
 8 participant status.

9 There could be no objection in our view to reporting  
 10 of 1(f), so the hearing timetable and structure,  
 11 including the likely dates of the summer break and the  
 12 days of sitting each week of the oral evidence hearings.

13 1(g) is update on disclosure and experts. Our view  
 14 is that there is no problem with what was said under  
 15 that heading being reported, save that there must be no  
 16 reporting of the fact that an expert in radicalisation  
 17 has been instructed. Any such reporting, in our view,  
 18 would give rise to a risk of prejudice, serious  
 19 prejudice, to the trial of Hashem Abedi so that such  
 20 reporting would be capable of being a contempt of court  
 21 and/or a breach of the section 4(2) order made in the  
 22 criminal proceedings.

23 So far as (h), update on venue and (i) live  
 24 streaming of the inquiry's oral evidence hearings is  
 25 concerned, we do not think there could be any objection

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1 to reporting of the discussions that took place.  
 2 Finally, (j), pen portraits, again, we do not think  
 3 there could be any objection to reporting of the  
 4 discussion that took place under that heading.

5 So just to summarise therefore, no reporting of the  
 6 discussion under heading 1(a), reporting of the  
 7 preliminary hearing on 28 January 2020, reporting of  
 8 1(b), the start date for the inquiry oral evidence  
 9 hearings, only to the extent that I have indicated, and  
 10 reporting of 1(g), update on disclosure and experts, but  
 11 excluding any reference to the instruction of  
 12 a radicalisation expert.

13 In our judgement, if that line is taken, if those  
 14 rules are complied with by the press, they will be fine,  
 15 but if they act contrary to what we have suggested is  
 16 appropriate, they would be at significant risk of being  
 17 found in contempt of court and/or in breach of the  
 18 section 4(2) order.

19 SIR JOHN SAUNDERS: Thank you.

20 MR GREANEY: We would wish to give the press an opportunity  
 21 to respond, of course.

22 SIR JOHN SAUNDERS: Absolutely. Would any member of the  
 23 press like to say something?

(Pause)

25 Thank you very much.

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1 I make it clear these are not my reporting  
2 restrictions ; they are the reporting restrictions of  
3 Mr Justice Jeremy Baker. So Mr Greaney has given you  
4 advice, but that's what it is, as to what you can do and  
5 still keep within the order. Thank you very much for  
6 your patience.  
7 I will now adjourn the case until the next hearing  
8 on 28 February.  
9 MR GREANEY: Indeed, sir, yes.  
10 MEMBER OF THE PRESS: [Inaudible] discussed this with  
11 Mr Greaney, and he said it would be acceptable, that the  
12 timetable made available to core participants should be  
13 made available to the press as soon as possible.  
14 MR GREANEY: That seems to me an entirely reasonable  
15 request.  
16 SIR JOHN SAUNDERS: And we will supply the press with what  
17 information we can as and when we can. So we will seek  
18 to cooperate, as I hope we have already, with you to the  
19 best of our ability .  
20 MEMBER OF THE PRESS: I'm grateful.  
21 SIR JOHN SAUNDERS: Thank you.  
22 MR GREANEY: Sir, just one final matter of clarification so  
23 there's no dispute about it . The original section 4(2)  
24 order was in fact made at the preliminary hearing by  
25 Mr Justice Sweeney.

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1 SIR JOHN SAUNDERS: Yes, I apologise, but continued no  
2 doubt.  
3 MR GREANEY: Indeed.  
4 SIR JOHN SAUNDERS: Thank you. I'll rise .  
5 (1.28 pm)  
6 (The inquiry adjourned until Friday, 28 February 2020)

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96 (1) 107:13