

OPUS2

Manchester Arena Inquiry PIR

Day 1

July 13, 2020

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Monday, 13 July 2020

(10.00 am)
SIR JOHN SAUNDERS: Good morning. Since the last hearing, a great deal of work, hard work, has been done, particularly on proposals for the hearing venue. I am extremely grateful for all the hard work that has been done and for the cooperative approach taken to consideration of those proposals by core participants. I very much hope, and I have no doubt, that we will continue that in the same spirit.

Mr Greaney.
MR GREANEY: Sir, thank you. This is the seventh preliminary hearing in the Manchester Arena Inquiry. The agenda for this hearing and the attendance list are at pages 5 to 6 of the hearing bundle available to all CPs. From the agenda you'll see that there are seven issues that arise for consideration by you today. They are as follows:

- (1), an update on the hearing timetable and hearing venue arrangements.
(2), the application for core participant status made on behalf of Kyle Lawler, a ShowSec employee who was present in the City Room at the time of the attack.
(3), the process for the advance notification of topics pursuant to Rule 10.

- (4), a general update on three topics, namely disclosure, expert reports and pen portraits.
(5), opening statements.
(6), the application and hearings on restriction orders and anonymity.
(7), GMP's referral to the Health and Safety Executive.

Sir, before dealing with the items on the agenda in that order, we'll update the CPs about the application for judicial review made by certain survivors of the attack in relation to your ruling of 21 April, refusing CP status to them.

The position in summary is that the application for judicial review was argued at a rolled-up hearing before the Divisional Court on 7 and 8 July, so that's last Tuesday and Wednesday. The following day, 9 July, the parties were informed that the court had decided that the claim for judicial review was out of time and that time would not be extended and furthermore that permission would in any event have been refused on the basis that the claim was unarguable; the judgment will be handed down in due course.

Since then, sir, there has been a development. By an email to the court timed at 3.35 pm on Friday 10 July, the claimants' counsel indicated that they

sought permission, or at any rate purported to seek permission, to appeal. What impact this has on the inquiry remains to be seen. It will undoubtedly divert resources, but the inquiry legal team remains determined to do all it can to commence the oral evidence hearings on 7 September.

Notwithstanding the development on Friday, it is CTI's view that it's essential we move forward constructively and in a spirit of cooperation with all survivors. For our part we continue to regard the survivors and the accounts they can give as an important part of the inquiry process. We want their evidence and many survivors are already scheduled in the plan to give evidence.

The inquiry legal team has made, sir, and will continue to make, arrangements to facilitate the survivors' engagement and participation in the inquiry in the ways we described during the course of last week's hearing. We have always accepted that, like the bereaved families, the survivors want a fearless and effective investigation, that they want us (inaudible: distorted) want the truth. That is what we want too and so we want them to be part of it. We very much hope that the survivors will be willing to assist the inquiry as it seeks to do these very things.

SIR JOHN SAUNDERS: Mr Greaney, I'm sorry to interrupt you. Every now and then for me, anyway, you disappear and I think it may be for everyone else as well. I don't know whether that's something to do with your computer or something generally, but perhaps we can sort it out.

MR GREANEY: Sir, would you prefer to take a short break at this stage so I can try and sort it out?

SIR JOHN SAUNDERS: No, I think you're reasonably all right, unless anyone else thinks we should. I have got most of it and indeed we can follow quite a lot of it in any event. I was just making it known that that is happening.

MR GREANEY: I'm disappointed to hear there's a problem because steps were taken to ensure that there wouldn't be. If it becomes more of a problem, sir, perhaps you'd let me know and we will then break and I'll take steps to resolve it.

MR COOPER: At one critical moment when Mr Greaney was saying exactly what the survivors' parties had chosen to do, mine cut out. I have put two and two together, but it may well be worth Mr Greaney again starting again as it were with the information he had at 3.35 or so. It's just as he was about to impart it, I lost him. I think I know what he was saying, but it may be useful, with your leave, sir, for that to be done.

1 SIR JOHN SAUNDERS: That's helpful, thank you, Mr Cooper.
 2 MR GREANEY: Thank you very much. I will repeat what I said
 3 about the development on Friday, which was this: by an
 4 email to the court timed at 3.35 pm on Friday, the
 5 claimants' counsel indicated that they sought permission
 6 to appeal or at any rate purported to seek permission to
 7 appeal. I added that what impact this has on the
 8 inquiry remains to be seen. It will undoubtedly divert
 9 the resources of the inquiry legal team. We are
 10 determined to do all we can to commence the oral
 11 evidence hearing on 7 September and I hope, Mr Cooper,
 12 you were able to hear that that time.

13 SIR JOHN SAUNDERS: Let's carry on.
 14 MR COOPER: I did hear, thank you.
 15 SIR JOHN SAUNDERS: It's not completely cured yet, but let's
 16 see how we can.

17 Submissions by MR GREANEY

18 MR GREANEY: I'll turn to the agenda items and deal first of
 19 all with an update on the hearing timetable and hearing
 20 venue arrangements.
 21 The oral evidence hearings will, as I have just
 22 indicated, subject to any intervening events, commence
 23 on 7 September. It is, of course, important to the
 24 highest degree that this date is achieved if at all
 25 possible and, sir, for our part we believe that it will

1 be possible to start on 7 September.
 2 The arrangements for the oral evidence hearings is
 3 (inaudible: distorted) contained across a number of
 4 documents prepared by the inquiry legal team --
 5 SIR JOHN SAUNDERS: Okay, Mr Greaney, it's started happening
 6 again. Could we all take a five-minute break? We don't
 7 need to log out, but let's let Mr Greaney sort it out;
 8 tell us when you're ready.
 9 MR GREANEY: I will, sir, thank you very much.

10 (10.11 am)
 11 (A short break)
 12 (10.15 am)

13 SIR JOHN SAUNDERS: Mr Greaney, I gather you're up and
 14 running now. You were suggesting that you might need to
 15 start again. I don't actually think that's necessary
 16 unless anyone else thinks it is. I think we have
 17 gathered what you said so far when we did stop, so
 18 I think you can carry on from where you were.
 19 MR GREANEY: I don't know if it was only me, but I am unable
 20 to see -- I can see you now. I could only hear a part
 21 of what you were saying and I don't think the problem
 22 now is at my end. What I'd understood you to say was
 23 that you did not consider it was necessary for me to
 24 start again but I could pick up where I left off.
 25 SIR JOHN SAUNDERS: That's exactly what I said, yes.

1 Thank you. Unless anybody, as I say, disagrees with
 2 that.
 3 MR GREANEY: Can I just check, sir, that you are able to see
 4 and hear me and everyone else is able to as well?
 5 SIR JOHN SAUNDERS: Yes, I think we all can.
 6 MR GREANEY: I am going to turn then to deal with the agenda
 7 items and deal, first of all, with an update on the
 8 hearing timetable and the hearing venue arrangements.
 9 As I've already indicated, the oral evidence
 10 hearings will, subject to any intervening events,
 11 commence on 7 September. It is important in the highest
 12 degree that that date is achieved if at all possible and
 13 we, for our part, believe that it will be possible.

14 The detail of the arrangements for the oral evidence
 15 hearings is contained across a number of documents
 16 prepared by your inquiry legal team. For present
 17 purposes the important documents are as follows: on
 18 29 May, STI circulated the provision plan for the
 19 evidence to be heard during chapters 1 to 11 of the oral
 20 evidence hearings. Then on 8 June, STI circulated
 21 a further note. That note deals with the hearing venue
 22 arrangements and the hearing plan.

23 That note was updated and revised in the light of
 24 submissions and the Government's adoption of the
 25 1-metre plus social distancing rule -- sir, I'm told

1 that I'm still freezing. Can I, sir, ask whether
 2 you are able to see me and hear me?
 3 SIR JOHN SAUNDERS: We can hear what you say, we can hear
 4 you, but your mouth is frozen for some of the time, but
 5 I think we can cope with that.
 6 MR GREANEY: Fine, sir. Then I'll carry on.
 7 SIR JOHN SAUNDERS: Thank you.
 8 MR GREANEY: As I was indicating, on 8 June there was
 9 circulated a note dealing with hearing venue
 10 arrangements and the hearing plan. That note has been
 11 updated and revised in light of the submissions and the
 12 Government's adoption of a different social distancing
 13 rule. The revised document was circulated on 2 July and
 14 a further revision of that note was circulated on
 15 Friday, 10 July.

16 Sir, as we hope will be apparent, we have worked
 17 hard to accommodate the reasonable requests of all CPs.
 18 Not every request can be accommodated in every respect.
 19 Some issues remain to be resolved and everything is
 20 subject to change given the uncertainty created by the
 21 current health crisis. However, we believe that we have
 22 achieved a working solution, even if some wrinkles
 23 remain to be ironed out.

24 Given the public nature of the hearing, it is
 25 necessary that we provide just a little detail about

1 each of the documents on this important issue. The
 2 provisional plan is a detailed document, running to some
 3 67 pages, setting out on a provisional basis the
 4 evidence which will be heard during chapters 1 to 11 of
 5 the oral evidence hearings. What each chapter deals
 6 with is set out in a structure document that can be
 7 found on the inquiry website. CPs are under directions
 8 made by you, sir, to respond to the content of the
 9 provisional plan as follows.

10 Comments are required in relation to chapters 1 to 9
 11 by 4 pm on 13 July and comments are required in relation
 12 to chapters 10 and 11 by 4 pm on 27 July. It follows
 13 that at the time of making these submissions, comments
 14 in relation to the provisional plan are not yet due,
 15 although comments have in fact been received from
 16 North-West Fire Control and BTP, for which we are
 17 grateful.

18 The inquiry legal team will consider all responses
 19 once the deadline has passed and adjustments will be
 20 made to the plan as appropriate. It is hoped that an
 21 updated plan accommodating the requests of CPs to the
 22 extent appropriate will be available for circulation
 23 in the week of 10 August.

24 Furthermore, the inquiry legal team can confirm
 25 that, as telegraphed in paragraph 17 of the plan,

9

1 subject to your agreement, our intention is to move the
 2 evidence on the emergency response, that is to say
 3 chapter 10, to begin in early 2021 and to fill the time
 4 in late 2020 with chapter 14, which covers
 5 preventability.

6 In his written submissions, Mr Weatherby QC, on
 7 behalf of the families that he represents, has raised
 8 the question of whether it may be possible and indeed
 9 sensible to call the evidence relating to chapter 13
 10 before the evidence in chapter 14 and this we'll keep
 11 under review.

12 So far as chapter 12 is concerned, that is to say
 13 the evidence about the experience of each of the
 14 22 deceased, work is ongoing to prepare witness
 15 proposals in relation to this most sensitive area of the
 16 evidence. The inquiry legal team is taking the
 17 following approach in relation to chapter 12 and the
 18 evidence for that chapter.

19 An outline of the evidence which is proposed will be
 20 called or read is being prepared in relation to each of
 21 those who died. That document will set out the
 22 structure which will be adopted in each case and sets
 23 out in relation to each part the evidence and its form.
 24 The rationale behind the approach that's been taken
 25 in the outline document is included so that those

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1 considering it can understand why that approach has been
 2 taken.

3 Once finalised, the document will be sent to the
 4 relevant CP family members for their consideration and
 5 input. The document stresses, and we emphasise now,
 6 that the outlines are intended to start a conversation
 7 on an individual basis as to the way in which the
 8 evidence in chapter 12 can be heard. Once those
 9 discussions have been completed, the proposed structure
 10 for chapter 12 will be circulated to all CPs.

11 The work on the outlines is well advanced and the
 12 inquiry legal team hopes that the first of the outlines
 13 will be available for circulation to the relevant CP
 14 family members by 17 July, that is to say this Friday.

15 Turning to deal with a note on the hearing venue
 16 arrangements and hearing. The most recent iteration of
 17 the venue note addresses both the proposed change to the
 18 timetable for chapter 10 and the practical arrangements
 19 for the oral evidence hearings in light of the ongoing
 20 pandemic.

21 In terms of the former, the note explains that it's
 22 intended that chapters 1 to 9 and 14 will be heard
 23 before Christmas 2020, with the other chapters to be
 24 commenced from early 2021.

25 This has, in our view, two benefits. First, it

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1 affords a more realistic timetable for the completion of
 2 chapters 1 to 9 and 14 when the pace of hearings is
 3 likely to be slowed due to COVID-19 measures. Second,
 4 it postpones some chapters of evidence that will be
 5 particularly well attended, such as emergency response,
 6 until a later date, by which time the threat presented
 7 by COVID-19 hopefully will have subsided.

8 The position we've reached so far as the practical
 9 venue arrangements are concerned is as follows. There
 10 is consensus that, notwithstanding the hugely
 11 challenging circumstances created by COVID-19, the oral
 12 evidence hearings will be able to start on 7 September.
 13 As we have emphasised a number of times now, this must
 14 happen if at all possible, which it should be.

15 That this is so is a testament to two things, both
 16 of which we pay tribute to: first, the hard work and
 17 creative thinking that has gone into adapting the
 18 inquiry spaces by the inquiry secretariat, whilst
 19 ensuring at all times that they remain as safe as
 20 reasonably practicable in accordance with the current
 21 guidance from Public Health England.

22 Secondly, by reason of the flexibility of thought
 23 and highly constructive engagement from CPs, recognising
 24 the scale of the challenge and offering their ideas in
 25 a spirit of cooperation as to how practically a start

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1 date of 7 September can be made to work.
 2 Live hearings will take place in the Manchester
 3 Magistrates' Court in the custom-built space that was
 4 previously courts 7 and 8. On the current layout, there
 5 is space for at least 24 members of the public, all of
 6 which we anticipate will be taken up by the bereaved
 7 families, although any spare capacity will be offered to
 8 survivors who fall outside this category.

9 Also in the room there will be space for up to
 10 22 lawyers, with 10 of those spaces being allocated to
 11 representatives of the bereaved family groups. There
 12 will be two spaces in the hearing room for accredited
 13 members of the press.

14 Two overflow courts, previously courts 9 and 10,
 15 which will have a live broadcast of proceedings, will
 16 provide space for 30 people with four spaces for the
 17 media. Arrangements will be made so advocates are able
 18 to ask questions from these courts if it becomes
 19 necessary for them to do so.

20 There will also be a broadcast to the Spinningfields
 21 Conference Centre; plans for that space are set out in
 22 the venue note.

23 We also anticipate that there will be a broadcast to
 24 preapproved venues. We anticipate that hubs will be
 25 created at convenient locations, such as counsels'

1 chambers or solicitor's offices. Enquiries are underway
 2 to create an annex for the press at the Midland Hotel
 3 which is five or so minutes away from the courtroom.
 4 Proceedings will be broadcast to that location.
 5 Proceedings will also be broadcast via the YouTube
 6 platform.

7 Sir, there are important matters of detail which
 8 still need to be addressed. We acknowledge those
 9 outstanding issues without descending into the detail of
 10 them. They're still under consideration and are likely
 11 to need to be the subject of further discussion in
 12 continuation of the collaboration which has occurred to
 13 date.

14 We have mentioned in the last few minutes the
 15 broadcast of the proceedings a number of times. The
 16 timing of the broadcasts we've set out is not a matter
 17 for today's hearing. The reason for this is that any
 18 broadcast which is not contemporaneous will need to be
 19 the subject of a restriction order under section 19 of
 20 the Inquiries Act and restriction orders are to be dealt
 21 with not at this hearing today but at a hearing on
 22 23 July.

23 Further, the timing and extent of any reporting,
 24 whether from within the main hearing room at Manchester
 25 Magistrates' Court or from a place to which proceedings

1 are broadcast also falls under the scope of restriction
 2 orders. We recognise and acknowledge that there is an
 3 interrelationship between the venue arrangements and the
 4 timing of any broadcast. In particular, we are acutely
 5 conscious of this issue in relation to the press and how
 6 matters may be reported. We are determined that the
 7 press have a proper opportunity to set out fully its
 8 position and any concerns it has.

9 However, for reasons of case management and ensuring
 10 that matters are dealt with in an orderly and efficient
 11 way, it is important that the two issues are kept
 12 distinct. As such, given the existing timetable,
 13 submissions in relation to the timing of broadcasts,
 14 save perhaps to the extent that they can be foreshadowed
 15 in summary terms, should be kept for the hearing on
 16 23 July, following which there will be an opportunity to
 17 take a step back and review the complete landscape.

18 So far as the press are concerned, carefully framed
 19 submissions have been received from Mr Bunting on behalf
 20 of the media, which acknowledge the structure which is
 21 being adopted. Those submissions raise important issues
 22 which will need to be ventilated more fully at the
 23 hearing on 23 July. So far as those issues which are
 24 engaged for today's hearing are concerned, we can
 25 confirm that the wish of the press to have more than

1 two people in the hearing room will be taken into
 2 account as and when there is any relaxation or lifting
 3 of the current social distancing guidance in relation to
 4 any proposal which is developed.

5 Furthermore, the submissions of Mr Bunting draw
 6 attention to an asserted inconsistency of treatment
 7 between those members of the press in the main hearing
 8 room and those in the overflow courts who are watching.
 9 May we be plain that it is not intended that there will
 10 be any inconsistency. Any restriction which is yet to
 11 be determined, which applies to the live reporting of
 12 any live broadcast, should, in our submission, apply
 13 equally and in the same terms to live reporting by those
 14 physically present in the courtroom.

15 We say this not intending to provoke argument on the
 16 point today, but simply to assist the preparation for
 17 the hearing at which these matters will be determined.
 18 This issue, namely timing, does not need to be, and
 19 indeed should not be, resolved today.

20 Before inviting submissions from CPs on the matters
 21 that we've just set out, it is important that we should
 22 stress that the venue note, so far as it deals with
 23 venue arrangements, is not seen as a static piece of
 24 work. It is in fact a living document. Its principal
 25 purpose was to demonstrate that the oral evidence

1 hearings could commence in a legitimate way while
2 maintaining the safety, so far as reasonably
3 practicable, of those who attend. It has been adapted
4 when deficiencies and improvements have been identified
5 and it is envisaged that this process will continue.

6 We are still several weeks from the start date in
7 what is, as we all know, an ever-evolving situation.
8 Furthermore, there are day-to-day details and issues of
9 real importance to participants which will need to be
10 ironed out and addressed.

11 One of these is how the spaces available at
12 Manchester Magistrates' Court will be fairly allocated
13 to the bereaved families and we recognise that is a most
14 important issue. There are a number of ways in which
15 this might be done, however we consider that rather than
16 a back and forth of written submissions the best way to
17 progress this so that it might be resolved prior to the
18 start date is to have a meeting with the bereaved
19 families' representatives following the hearing today
20 and arrangements have already been made for that to
21 occur.

22 Other issues can and should be the subject of
23 ongoing dialogue, but CTI hopes that all concerned
24 accept the proposition that ensuring to the maximum
25 degree possible the accessibility of the oral evidence

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1 hearings, whether by the bereaved families, their
2 representatives, survivors, the public at large or the
3 press, lies at the very heart of all of the work that is
4 going into this issue.

5 Sir, that is all we propose to say at this stage at
6 any rate about the first agenda item. We suggest that
7 submissions next be received in the following order:
8 from Mr Bunting on behalf of the media, who cannot be
9 with us beyond 11 o'clock, then from the bereaved
10 families, and then from any other core participants.

11 SIR JOHN SAUNDERS: Thank you. Mr Bunting.

12 Submissions by MR BUNTING

13 MR BUNTING: Sir, as you will have seen from the note, the
14 written note which is in the bundle for today's hearing
15 at page 162, I appear on behalf of seven media
16 organisations: Times Newspapers Limited, Sky News, News
17 Group Newspapers, Guardian News and Media, Reach PLC,
18 Associated Newspapers, and the British Broadcasting
19 Corporation.

20 The note we have set out draws attention to two
21 kinds of issues: one, a legal issue in respect of delay,
22 and I have listened very carefully to everything
23 Mr Greaney QC has said. I don't intend to foreshadow
24 any submissions today which we will make in much greater
25 detail on 23 July. The other issues set out in a note

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1 are practical issues in respect of access to the
2 hearings.

3 I'm very grateful for the constructive discussions
4 I've had over the weekend and late last week with
5 Mr Suter and Mr Greaney QC in respect of access to the
6 hearings.

7 The media are very grateful for the indication that
8 the number of media representatives in the hearing room
9 will be kept under review. Can I stress straightaway at
10 that stage that we recognise that others will have
11 a significantly important interest in also attending the
12 hearing room.

13 But the final practice issue is an issue in respect
14 of the Midland Hotel. The Midland Hotel we understand
15 to be some distance away from the hearing rooms.
16 We have spoken to Mr Suter and Mr Greaney and we
17 understand that alternative venues will be explored and
18 we'll look forward to further discussions with the
19 secretariat and the legal team for the inquiry.

20 SIR JOHN SAUNDERS: If 5 minutes is correct for the distance
21 between, is that too far?

22 MR BUNTING: Well, I think there's a dispute of fact, if
23 I can put it that way, in respect of how far away it
24 actually is. Some obviously walk slower than others.
25 But there are practical reasons of importance for having

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1 access to the hearing room because it means that we can
2 access, as the media, other people who can cross-refer
3 and assist us in ensuring accurate and responsible
4 reporting, and those for reasons we're very grateful for
5 the indication that alternative venues are being
6 explored and we'll do our best to take part in those
7 discussions. Can I assist you any further on those
8 points, sir?

9 SIR JOHN SAUNDERS: No, that's very kind. Thank you very
10 much, Mr Bunting, I'm very grateful.

11 Who on behalf of the families would like to make
12 representations? Mr Weatherby?

13 Submissions by MR WEATHERBY

14 MR WEATHERBY: Yes, very briefly. Thank you for that, and
15 thank you to Mr Greaney for setting out in such clarity,
16 both in writing and orally, the proposals that have been
17 made.

18 Can I briefly refer to a point he raised about the
19 radicalisation evidence. It appears to us that if
20 chapter 14, the preventability section of evidence,
21 which deals, as we understand it, with the entirety of
22 the security services' evidence, if that is to be dealt
23 with before Christmas -- and again we understand how
24 sensible it is to fill the available time with that
25 evidence -- but for our part we don't see how that can

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1 be dealt with without dealing with the radicalisation
2 evidence first . That is because there may well be
3 evidence, particularly , for example, relating to the
4 bomber's father and his history and what was known by
5 the security services about that history of involvement
6 with Libyan Islamist groups. Therefore, for our part,
7 in terms of the inquiry looking at the preventability
8 evidence with the security services , we feel that
9 evidence ought to be looked at first .

10 In terms of the actual venue arrangements, again
11 it is very obvious that --

12 SIR JOHN SAUNDERS: I'm sorry, before you move on, it does
13 occur to me that the radicalisation evidence falls into
14 a number of distinct parts . So we have places of
15 education, we'll be having submissions or hearing
16 evidence in relation to that as well, and then you have
17 the history in Libya, which may be distinct . But
18 obviously, all those matters can be looked at when we're
19 deciding the timetable .

20 I take your point about --

21 MR WEATHERBY: Yes, sorry, I'd moved slightly quicker than
22 perhaps I ought to have. I've indicated the two parts
23 of chapter 13 that I think need to be looked at before
24 chapter 14 in writing so I fully , with respect , agree.
25 There are parts of chapter 13 that wouldn't need to be

21

1 dealt with before chapter 14.

2 In terms of the venue arrangements, I' ll move very
3 quickly. It's quite plain that huge efforts have been
4 made to do everything possible to ensure that the
5 hearings are as near normal as possible and that the
6 approach being taken is that only changes that are
7 absolutely necessary are made to that process .

8 Can I simply flag up four points, which I know that
9 Mr Greaney and your team have in mind, but I think it's
10 important to just flag them up in this hearing .

11 The first is that any arrangements that are made on
12 13 July have to remain provisional . It's often said in
13 all sorts of processes that matters will be kept under
14 review, but the position as at 7 September is obviously
15 unknown to any of us. The position could be better,
16 worse, or the same. Therefore, however much the change
17 of arrangements that may be necessary is, nothing should
18 be done to affect the overriding public interest and
19 public safety . I know you have that well in mind, but
20 I think it's important to say it .

21 Three practical matters. We remain of the view that
22 there ought to be regular testing available at the
23 venue. The simple point is this: the more people who
24 are regularly tested, the less likely it is that there
25 will be infection caused by attendance at the venue. It

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1 really is as simple as that .

2 The second point trespasses slightly on the delay
3 point on the live stream, but only slightly . We flagged
4 up that there are a significant number of people,
5 bereaved family members in particular , who have
6 vulnerabilities , and whatever arrangements are made
7 in the current circumstances they will simply not be
8 able to attend. Given that arrangements are being made
9 for a real-time live stream to some venues, whatever is
10 determined on 23 July, we would ask that real-time live
11 streaming is made to those that are clearly vulnerable
12 to the extent that they cannot attend so as to put them
13 in as close a position as is possible to those that are
14 able to attend. We think there are practical
15 arrangements that can be made with very limited extra
16 resources and we will talk to your team about that.

17 The final point I simply want to flag up because
18 it's so important, and we have raised this before,
19 is that special arrangements should be made for travel,
20 wherever possible , to minimise the necessity for family
21 members to use public transport . That should include
22 dedicated parking close to the hearing . Those are the
23 only points I would wish to raise on this part of the
24 agenda. Thank you.

25 SIR JOHN SAUNDERS: Thank you. Mr Cooper.

23

1 Submissions by MR COOPER

2 MR COOPER: Sir, thank you very much.

3 We are grateful again, as we all are, for the work
4 that's been done by you, sir , and indeed by your team.
5 We note in particular the attitude being taken to our
6 previous submissions, which have -- clearly attempts
7 have been made to include them within the developing
8 process and we're grateful for that .

9 Sir, you've had an opportunity, I know, of reading
10 our subsidiary document of 6 July and I'm not going to
11 repeat that at any great length; obviously, you have
12 that before you to assist you in your work.

13 There are just a number of matters under this
14 heading we'd like to flag and they appear in
15 paragraph 2.4 of our document. I'm not going to repeat
16 each and every one.

17 In general we emphasise again, as I know Mr Greaney
18 has, and all take it on board, the importance of making
19 as much room available as possible in the main hearing
20 room for families and the bereaved to attend. To that
21 we expressed our concern and continue to express our
22 concern that as much procedure be put in place as
23 possible to prevent cancellation , short-term
24 cancellation , of seating which may leave empty seats
25 when families could have taken it . I know, sir , that

24

1 will be continually a matter that will be addressed as
 2 time goes on.
 3 One of the issues we didn't see in the developing
 4 document from the inquiry team was our submission on the
 5 previous occasion, which we repeat again in
 6 paragraph 244 of our document, that of separate rooms
 7 for the bereaved and the survivors. For reasons that we
 8 expressed on a previous occasion, it is not meant -- and
 9 I emphasise it again for those that may be listening
 10 that didn't previously hear our submissions on the
 11 matter -- it's not intended to be divisive, not at all.
 12 Many bereaved and indeed many bereaved that we represent
 13 also have survivors within their families. But,
 14 nonetheless, it been expressed directly to us, as far as
 15 our clients are concerned, that there is a facility and
 16 should be a facility available to the bereaved
 17 themselves for their own personal difficulties and
 18 personal problems of grieving and coming to terms with
 19 this tragedy, that they should all be given together in
 20 one room or given the chance to be together in one room
 21 so that they could mutually hear the evidence and cope
 22 with it as best they could, and mutually support each
 23 other from a position of having common problems and
 24 common difficulties.
 25 I note that has not yet been readdressed. I'm not

1 suggesting it has been ignored, far from it, but we
 2 mention it again now to ensure perhaps that it's on your
 3 agenda and, more particularly, Mr Greaney's agenda as we
 4 move forward.
 5 As far as other issues are concerned, we simply
 6 emphasise again our paragraph 247 in our document, that
 7 particular effort be made for the availability of
 8 accommodation in the main hearing room during the pen
 9 portrait phase of the hearings, which, as we've already
 10 indicated -- I'm sure I speak for everyone so far as the
 11 families are concerned -- is a very important part of
 12 the process. So we would particularly ask, if we might
 13 respectfully do so, so far as it can be available, that
 14 maximum provision be made, particularly during that
 15 period, for bereaved families.
 16 Apart from that, sir, and apart from commending our
 17 document of 6 July to you, those are our submissions.
 18 SIR JOHN SAUNDERS: Thank you, Mr Cooper. Mr Atkinson?
 19 Submissions by MR ATKINSON
 20 MR ATKINSON: Sir, to avoid repeating that which has already
 21 been said by others, which I echo, but I do, on behalf
 22 of those I represent, want to express our gratitude for
 23 all the care, hard work and hard thinking by the inquiry
 24 team that has gone into getting us to a position where
 25 it does look that we will be able to start on

1 7 September. We are very grateful for that.
 2 We are grateful that, as part of that, the
 3 commitment to the families being at the centre of this
 4 inquiry remains, and it is in that context that I do
 5 encourage others to reflect on their need to be in the
 6 main room during the hearings.
 7 One change between the first and second iterations
 8 of the inquiry team's proposals at pages 8 and 24 of the
 9 bundle was a decrease in the number of spaces in the
 10 room available to families from up to 36 to down to 24.
 11 That in large part is because of the increase in the
 12 number of positions for advocates in the main room. We
 13 entirely understand that those who are representing
 14 other CPs will need, in the interests of their clients,
 15 to be there when they need to be there, but we do ask
 16 for flexibility from them, which we will be encouraging
 17 of the other family teams in relation to their
 18 representatives, to maximise the number of seats for the
 19 families themselves so the experience is, to use the
 20 words of Mr Gibbs, vivid from their point of view more
 21 than anybody else's.
 22 The only other point I would wish to mention is to
 23 echo strongly my support for Mr Weatherby's position in
 24 relation to those parts of chapter 13 that logically
 25 must come before chapter 14, but we are very willing to

1 engage in further discussions with Mr Greaney and his
 2 team about that going forward.
 3 But unless I can assist with anything further, sir,
 4 those are the only points I was going to make.
 5 SIR JOHN SAUNDERS: Thank you very much, I'm grateful.
 6 Would anyone else like to make any submissions on
 7 these matters? No? Right. Thank you very much.
 8 I know there are going to be further discussions
 9 later on this morning. There's obviously a great deal
 10 of cooperation going on. You can see how people's
 11 requests have tried to be met, but you'll also notice
 12 that some are inconsistent with each other, so no one is
 13 going to get everything they want, but hopefully as much
 14 as possible can be met, and particularly in the
 15 interests of the families.
 16 Mr Greaney.
 17 Submissions by MR GREANEY
 18 MR GREANEY: Thank you, sir. I will turn then to the second
 19 issue on the agenda.
 20 On 30 June an application was made on behalf of
 21 Mr Kyle Lawler for core participant status. Mr Lawler,
 22 as I've indicated, was working for ShowSec in the
 23 City Room at the time of the attack and his involvement
 24 over that period will be the subject of most close
 25 scrutiny during the course of chapter 7.

1 Submissions have been received from a number of CPs
 2 on Mr Lawler's application . ShowSec and the bereaved
 3 families represented by Addleshaws are neutral . The
 4 bereaved families represented by Hogan Lovells do not
 5 object to the application , observing that Rule 5(2)(c)
 6 is met and that the grant of the application should not
 7 add significantly to the length of the proceedings. SMG
 8 submits that the application ought to be granted, but
 9 the bereaved families represented by Slater & Gordon
 10 oppose the application .

11 Following receipt of submissions from those CPs,
 12 further observations were made on behalf of Mr Lawler,
 13 responding to the points that had been made. We'll deal
 14 with the application in summary.

15 The following is submitted on Mr Lawler's behalf.
 16 Firstly , that until the early part of this year he fell
 17 under the umbrella of ShowSec, an organisation which has
 18 CP status. Secondly, that the reason why Mr Lawler no
 19 longer falls under their umbrella is because there has
 20 emerged a conflict of interest , and we understand that
 21 ShowSec acknowledge that that conflict of interest
 22 exists .

23 Those representing Mr Lawler have indicated he
 24 consents to being designated a core participant , which
 25 of course is a condition precedent to that status being

1 granted. Furthermore, it 's submitted that Mr Lawler
 2 meets Rule 5(2)(a) and 5(2)(c) separately and/or
 3 cumulatively. In support of the former, the role he
 4 played on the night as bridge SAI and his interaction
 5 with Salman Abedi are relied upon. As to the latter ,
 6 the content of the inquiry 's security expert report ,
 7 which is critical of Mr Lawler, is cited in support.

8 In terms, sir , of your discretion , the application
 9 on behalf of Mr Lawler submits that matters have been
 10 progressed as quickly as possible once his lawyers had
 11 been instructed and that the time limit for service of
 12 the application should be extended. An undertaking is
 13 offered that no application will be made by Mr Lawler
 14 which will result in delay to the start date of the
 15 inquiry 's oral evidence hearings .

16 Further submissions are made on his behalf
 17 in relation to not diluting the centrality of the
 18 deceased and their families to the process, the fact
 19 that costs will be kept to a minimum because what is
 20 sought is that Mr Lawler:

21 "... be a core participant for specific parts of the
 22 inquiry only."

23 The fact that the only CP with whom Mr Lawler has
 24 common interest is ShowSec and that there is a conflict
 25 of interest with ShowSec so that he cannot be

1 represented by their recognised legal representative .
 2 The fact that Mr Lawler's conduct will be carefully
 3 analysed and the fact that , it is submitted, that
 4 fairness requires he be allowed to address any criticism
 5 directly in order to put his conduct into the context of
 6 the wider picture and that this can only be achieved,
 7 it 's said, by being designated a CP.

8 We, as CTI, submit that Mr Lawler is entitled to
 9 what we have described as active participation in
 10 chapter 7, the security arrangements of the oral
 11 evidence hearings . Whether this requires CP status or
 12 something short of that is the real issue .

13 On early hearings to determine applications for
 14 CP status made by certain survivors and later by the
 15 FBU, we set out the principles that apply and we adopt
 16 those without repeating them.

17 We submit that Mr Lawler undoubtedly meets the
 18 criterion in Rule 5(2)(c). As matters stand, he is the
 19 subject of express and significant criticism in the
 20 security expert 's report . Accordingly, Mr Lawler may
 21 well be the subject of express and significant criticism
 22 during the inquiry proceedings themselves. As
 23 a consequence, he falls squarely within the terms of
 24 Rule 5(2)(c).

25 In those circumstances it is not necessary for us to

1 make any observations on the submission that
 2 rule 5(2)(a) is also engaged and, in our view, no ruling
 3 on that issue is needed. So we'll turn to deal with
 4 your discretion .

5 We submit that the following factors entitle
 6 Mr Lawler to active participation in chapter 7, but only
 7 in that chapter: (1), but for the conflict of interest
 8 Mr Lawler's interests would have been looked after by
 9 reason of ShowSec's status as a CP, but as matters now
 10 stand, his interests no longer coincide with those of
 11 any other CP.

12 (2), the criticisms made of Mr Lawler are of a very
 13 serious nature. In the context of the inquiry 's terms
 14 of reference , they go to the heart of the issues which
 15 arise under term of reference 4, namely whether or not,
 16 if there were inadequacies in the security arrangements,
 17 such inadequacies contributed to the extent of loss of
 18 life which occurred.

19 Whilst it 's entirely a matter for you, sir , in due
 20 course to decide whether or not the security expert 's
 21 current conclusions are correct , it is our view that
 22 fairness requires that Mr Lawler is able to participate
 23 actively in chapter 7 in order to ensure that whatever
 24 conclusions are reached are arrived at justly and with
 25 the benefit of Mr Lawler's contribution . Whether in the

1 circumstances of Mr Lawler's case active participation
 2 requires that he be designated a CP is, as we've
 3 indicated, a matter for your discretion. CTI's
 4 provisional view, as set out in our written submissions
 5 on Friday, was that it did not necessarily do so, but
 6 that active participation in the particular
 7 circumstances of Mr Lawler's case should include the
 8 right to ask questions of witnesses during chapter 7 and
 9 therefore the right to legal representation during that
 10 stage, along with the disclosure of material relevant to
 11 the security arrangements and also the right to make
 12 a closing submission.

13 Sir, having reflected further over the course of the
 14 weekend, we consider that what we are suggesting is so
 15 close to CP designation that the better course, rather
 16 than creating some kind of hybrid status, would be to
 17 grant Mr Lawler CP status, but, as we've emphasised, for
 18 chapter 7 only. Not only this, but any opening
 19 statement by Mr Lawler is likely to be of no or at best
 20 only limited assistance to you and if such an opening
 21 statement is to be made, it should be strictly time
 22 limited.

23 Although Mr Lawler's application for CP status has
 24 been made long after the deadline set for the receipt of
 25 such applications, namely 20 November, that delay has

1 been adequately explained in our view and does not, in
 2 our judgement, weigh against the application, including
 3 because the application does not pose a risk to the
 4 inquiry's start date, given the undertaking that has
 5 been offered by Mr Lawler's representatives.

6 Finally on this issue, we make two points. First,
 7 we acknowledge the important submission made on behalf
 8 of the bereaved families represented by Slater & Gordon.
 9 As they observe, it is essential that the inquiry is not
 10 derailed by a flurry of CP applications provoked by
 11 Mr Lawler's application. We believe that the approach
 12 we have proposed addresses this concern. Mr Lawler
 13 would be afforded active participation within the
 14 relevant section of the inquiry only. That would
 15 properly recognise the fact that ShowSec cannot
 16 represent Mr Lawler and the fact that the degree of
 17 potential criticism he faces and its nature and extent
 18 sets him apart from many others who currently fall
 19 within the remit of organisational CPs.

20 Further, these factors arise in circumstances where
 21 it seems to us that there is a good explanation for the
 22 timing of the application and an undertaking is offered
 23 which we submit should be accepted by you, sir, that no
 24 application will be made on Mr Lawler's behalf for
 25 additional time that might otherwise delay the start

1 date of the inquiry's oral evidence hearings.

2 The second point is this: we do understand that the
 3 survivors who applied for CP status may struggle to
 4 understand why we support this application but did not
 5 support theirs. The answer is that each application
 6 must be determined on its own facts. A critical
 7 difference between this application of Mr Lawler and
 8 that of the survivors is that whereas the survivors'
 9 interests coincide with those of the bereaved families,
 10 Mr Lawler's interests coincide with no other CP in
 11 circumstances in which he will be subject to significant
 12 and explicit criticism.

13 Sir, having set out the position of CTI, we will
 14 invite submissions first of all from counsel instructed
 15 on behalf of Mr Lawler, followed by submissions on
 16 behalf of ShowSec by Mr Gillespie, if he wishes to make
 17 such submissions, then from Mr Cooper on behalf of the
 18 Slater & Gordon bereaved families, and then from any
 19 other family representative who wishes to make
 20 submissions and then from any other core participant who
 21 wishes to do so. But the final word should go to
 22 Ms Naqshbandi on behalf of Mr Lawler in our view.

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

24 Ms Naqshbandi.

25

1 Submissions by MS NAQSHBANDI

2 MS NAQSHBANDI: Thank you. May I begin by thanking your
 3 legal team for their assistance and careful
 4 consideration throughout this process and, in
 5 particular, in providing material to inform our
 6 application.

7 Before I turn to the substance of the application,
 8 there are four preliminary submissions that we make.
 9 First, in making this application our concern is to
 10 ensure that Mr Lawler, in the position of someone who is
 11 a significant witness to what happened that terrible
 12 night and who may be the subject of criticism during the
 13 course of the proceedings and in your final report, has
 14 the opportunity to fully and fairly address those issues
 15 and put into context his conduct in circumstances where
 16 but for a conflict of interest his interests would have
 17 been looked after when giving evidence by ShowSec,
 18 a core participant, with all the procedural rights
 19 afforded to core participants.

20 Secondly, we make it clear that he seeks CP status
 21 only for those parts of the inquiry which are relevant
 22 to his position, both to his conduct that night and the
 23 context of the security arrangements, and we are
 24 grateful to Mr Greaney QC for his assurance that the
 25 only relevant part of the evidence to Mr Lawler is

1 chapter 7 and therefore we seek core participant status
 2 for that part of the oral evidence only.
 3 Thirdly, in our submission, for Mr Lawler fairness
 4 requires a level of participation which goes beyond that
 5 of a witness. We rely in support of the submissions
 6 that are made by Mr Greaney QC today, both orally and in
 7 writing, submitted last Friday, where he said, turning
 8 to page 193 of the hearing bundle at paragraph 44:
 9 "It is our view that fairness requires that
 10 Mr Lawler is able to participate actively in chapter 7
 11 in order to ensure that whatever conclusions are reached
 12 are arrived at justly and with the benefit of
 13 Mr Lawler's contribution."
 14 Fourthly, sir, as to the timing of the application,
 15 your legal team agrees that the timing of the
 16 application does not weigh against the application being
 17 granted and the time to be extended. Although there is
 18 objection from those bereaved families represented by
 19 Slater & Gordon, we have set out in writing, both on
 20 30 June and 6 July, in detail the reasons why the
 21 application could not be made sooner. I do not intend
 22 to repeat those, they are set out at pages 48 and 114,
 23 save to say we do repeat the undertaking that has
 24 already been given in writing that we will not seek
 25 additional time that might otherwise delay the start of

1 this inquiry. So in those circumstances, we invite you
 2 to extend time for the application to be made.
 3 Let me turn to the two questions, sir, that you must
 4 determine in this application. First, does Kyle Lawler
 5 satisfy at least one of the criteria in Rule 5(2), and
 6 secondly, if he does, how should you exercise your
 7 discretion?
 8 As to the first question, no one has suggested that
 9 he does not satisfy at least one of those criteria.
 10 Mr Greaney QC has said that he falls full square within
 11 the terms of Rule 5(2)(c) and it is therefore not
 12 necessary for you, sir, to make any determination on
 13 whether Rule 5(2)(a) is engaged. So you have our
 14 submissions at page 47 of the hearing bundle and we
 15 invite you to find that Rule 5(2) is met, either for
 16 subsection (a), subsection (c), or cumulatively.
 17 Turning to the second question and the exercise of
 18 your discretion, we have set out the factors which, in
 19 our submission, are relevant to the exercise of your
 20 discretion in the context of your duty of fairness under
 21 section 17 of the Act. Our main submissions are set out
 22 from page 48 onwards of the hearing bundle and I do not
 23 propose to repeat those in full, save to highlight four
 24 specific points.
 25 First, as we have set out, we agree, of course, that

1 the bereaved families must remain at the heart of this
 2 inquiry and nothing that we say or our active core
 3 participation that we seek in this inquiry will dilute
 4 from the centrality of the deceased and the bereaved
 5 families in your inquiry.
 6 Secondly, the views of other core participants.
 7 Unlike other applications which, sir, you have received
 8 and indeed heard, there is not for this application
 9 universal objection. There is one objection to the
 10 application, there is one core participant in support,
 11 others have not objected, remained neutral or are
 12 silent, and your legal team support this application.
 13 Thirdly, the ability of Mr Lawler to engage without
 14 being a core participant. Again, sir, we are grateful
 15 to your legal team, in particular Mr Greaney QC, for
 16 reflecting upon the legal submissions that were made on
 17 Friday and indicating today that the difference between
 18 what was suggested then as being active participation
 19 less CP status and CP status now appear to be so close
 20 that in fact it would be preferable to grant Mr Lawler
 21 core participant status.
 22 Sir, all we seek is for Mr Lawler to have
 23 a sufficient and proper fair level of participation to
 24 allow him to fully engage in your inquiry and have the
 25 ability to respond properly to the likely criticisms and

1 close scrutiny that he will face during the course of
 2 this inquiry and, possibly, in your final report. So in
 3 our submission, to allow anything less than full
 4 participation of core participant status will not be
 5 sufficiently fair to meet the requirements of section 17
 6 of the Act in circumstances where but for a conflict of
 7 interest determined by ShowSec, he would have had fair
 8 representation and they would have looked after his
 9 interests when he was giving evidence at your inquiry.
 10 Sir, it's for those reasons, and I don't repeat what
 11 we have said in writing, that we say that core
 12 participant status is appropriate for Mr Lawler.
 13 The fourth point is what is raised as the potential
 14 for other future applications should you deem it
 15 appropriate to grant core participant status to
 16 Mr Lawler today. It is suggested by the bereaved
 17 families represented by Slater & Gordon that if
 18 Mr Lawler is granted core participant status on the
 19 basis of this application, the inquiry might expect
 20 a flood of further applications being made by those who
 21 see themselves in a similar position as Mr Lawler and
 22 seeking the same CP status that he might have been
 23 granted. Those submissions are to be found at page 65
 24 and paragraph 4.25 of the hearing bundle.
 25 But Mr Lawler's circumstances, in our submission,

1 are unique. His application is made in the context of
 2 an individual who but for a conflict of interest would
 3 have had his interests looked after by a core
 4 participant, and it is made for a limited part of the
 5 evidence. If there are other witnesses who are aware of
 6 this application and are considering making their own,
 7 they would equally be aware of the circumstances within
 8 which it is made and would have to find similarities
 9 with those circumstances in order to rely upon your
 10 grant, should you make it, in support, and they will
 11 have heard the observations properly made by
 12 Mr Greaney QC in that respect. They will also be aware
 13 from this application and others made more recently of
 14 the need to justify why the application could not have
 15 been made sooner.

16 Sir, those are, in our submission, significant
 17 deterrent factors against the concern of floodgates
 18 being opened should you grant this application.

19 Sir, finally, if you are minded to grant the
 20 application we would also seek to be recognised legal
 21 representatives for the parts of the inquiry in which we
 22 engage.

23 Sir, those are our submissions.

24 SIR JOHN SAUNDERS: Could you help me on two points?

25 Firstly, it's apparent from information received from

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1 ShowSec that there is one other person who appears to be
 2 in an identical position to Mr Lawler, so he's not
 3 entirely unique. That's what ShowSec indicate. Do you
 4 want to say anything about that?

5 MS NAQSHBANDI: Sir, yes. The difference, we understand,
 6 from ShowSec, subsequent to the written submissions
 7 being made, and it can be confirmed by them
 8 independently, is that that individual has not had the
 9 benefit of being represented by ShowSec thus far. So
 10 the difference is Mr Lawler, up until the point at which
 11 ShowSec identified there was a conflict of interest,
 12 would have had his interests looked after by ShowSec
 13 during the course of giving evidence.

14 SIR JOHN SAUNDERS: Right. I must say that is news to me.

15 I thought that ShowSec were representing all of their
 16 employees except where they've declared they weren't
 17 because of a conflict of interest. But they can confirm
 18 that one with the other.

19 The second point is this: the difference between
 20 Mr Greaney's two positions, Friday and today, would
 21 appear to be in practice that his position today would
 22 give you the right to make an opening statement if you
 23 wished to do so, where his position on Friday was that
 24 you wouldn't. Is an opening statement of significance
 25 to you in the case of Mr Lawler?

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1 MS NAQSHBANDI: Sir, it's difficult to answer that question
 2 today in the absence of having the ability to see what
 3 the evidence is. We have understandably had limited
 4 disclosure for the purposes of informing this
 5 application. I simply haven't seen the substance of the
 6 evidence that will go in chapter 7, and certainly,
 7 of course, we hear what is said by Mr Greaney QC and the
 8 concerns, sir, that you will have. Those will be fully
 9 taken on board should you grant the application.

10 If it is not necessary to make an opening statement
 11 having reflected upon the evidence, then we will
 12 indicate, sir, but I think in the circumstances, it's
 13 difficult for me to answer that either way today.

14 SIR JOHN SAUNDERS: Okay, thank you. Thank you very much.
 15 Mr Cooper?

16 Submissions by MR COOPER

17 MR COOPER: Sir, we're grateful, and I have listened very
 18 carefully to the submissions that have been made,
 19 particularly the submission by Mr Greaney concerning his
 20 present position.

21 On reflection, providing that the status is limited
 22 to chapter 7, we would not argue against the confined
 23 granting of the application in relation to chapter 7, so
 24 in effect Mr Greaney's present position.

25 Sir, unless we can assist you further, those are our

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1 submissions on that.

2 SIR JOHN SAUNDERS: Thank you very much.

3 Mr Weatherby? Mr Atkinson? Anybody else have
 4 anything to say on this application?

5 Mr Greaney.

6 MR GREANEY: Sir, we don't have any further submissions to
 7 make in relation to Kyle Lawler's application and we
 8 anticipate that, as with the other applications for CP
 9 status that have been made, you will rule upon this
 10 application in due course in writing.

11 SIR JOHN SAUNDERS: Yes. It would be good to get
 12 clarification, please, from ShowSec, if they're able to
 13 give it to me, about what the position is with the other
 14 person we were talking about who appeared to be in
 15 a similar position.

16 MR GREANEY: Sir, I wouldn't want to put Mr Gillespie, who
 17 has recently come into the case in a difficult
 18 position -- I wonder whether the better course is for
 19 ShowSec to indicate the position in writing within the
 20 next 24 hours.

21 SIR JOHN SAUNDERS: I'm perfectly happy with that unless
 22 Mr Gillespie wants anything different, which I assume he
 23 doesn't.

24 Right, we'll carry on with the next point.

25 Thank you.

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1 Submissions by MR GREANEY
 2 MR GREANEY: Sir, turning then to the third agenda item, the
 3 process for advance notification of topics .
 4 Submissions dated 1 May have been made on behalf of
 5 MI5 that the corporate witness who will be called to
 6 address issues in chapter 14, preventability , should be
 7 outside the inquiry 's protocol under Rule 10, namely
 8 in relation to the timing of the provision of such
 9 information by CPs and the level of detail .
 10 Those representing the bereaved families do not
 11 agree that this should be the approach and they've
 12 raised the following issues about the evidence of
 13 Witness J and the evidence relating to the security
 14 service more generally: whether witnesses of fact in
 15 addition to Witness J should be called in open session ;
 16 whether bereaved family members can be present in the
 17 hearings which deal with closed material ; whether the
 18 individual documents underlying any corporate witness
 19 statement should be disclosed , even if only in part ;
 20 whether a restriction order or some other ruling is
 21 required in relation to witnesses giving evidence in
 22 closed session ; and whether the number of witnesses who
 23 are to give evidence in closed session should be
 24 specified .
 25 In our submission, those questions are all properly

1 raised and are matters which you will need to resolve in
 2 due course, following a full opportunity for those with
 3 submissions on the subject to be heard.
 4 To that end we submit that you should make the
 5 following directions : (1), service of a single
 6 consolidated document on behalf of all bereaved families
 7 which raises any issue that bears upon this topic of the
 8 MI5 evidence. We don't envisage that this needs to be
 9 a substantial piece of work in terms of the generation
 10 of new content, although this should not be taken as
 11 implying that further submissions cannot be made.
 12 However, we submit that in order to ensure that no
 13 submission is overlooked and that all relevant
 14 submissions are in one place, it would be helpful if
 15 such a document were to be created. We submit, subject
 16 to what is said on behalf of the families , this ought to
 17 be possible by 20 July, so next Monday.
 18 (2), service of a response on behalf of MI5 dealing
 19 with each of the issues raised . We submit that this
 20 ought to be possible by 27 July .
 21 (3), service of CTI's position by 3 August.
 22 (4), the listing of a hearing for resolution of
 23 these specific issues during the week of 10 August.
 24 As will be obvious, this is likely to include both
 25 open and closed sessions .

1 Sir , having proposed those directions , may we call
 2 upon Mr Atkinson first on behalf of the bereaved
 3 families , he's been at the forefront of this issue ,
 4 followed by counsel for any other family groups ,
 5 followed by any other core participants , and then
 6 finally Mr Sheldon on behalf of HMG if he has any
 7 submissions to make.
 8 SIR JOHN SAUNDERS: Mr Atkinson.
 9 Submissions by MR ATKINSON
 10 MR ATKINSON: Sir, we have no difficulty with the timeline
 11 outlined by Mr Greaney, save for one important
 12 difference . My team have been making submissions,
 13 particularly in relation to witnesses of fact , on behalf
 14 of the security service since 22 July of last year .
 15 We're almost reaching our anniversary in relation to
 16 those submissions .
 17 The five areas that Mr Greaney identifies as being
 18 areas that we have flagged up, whether there are
 19 witnesses of fact , the presence of families in the room
 20 when evidence is given and so on, are issues that
 21 we have flagged up repeatedly in that period of time,
 22 and we get small hints in submissions on behalf of the
 23 Secretary of State occasionally , so we learnt , for
 24 example, quite recently that there were apparently
 25 witnesses of fact in addition to Witness J. But it

1 seems very much to us that the right way forward, with
 2 the greatest of respect , is for the Secretary of State
 3 to identify her position in relation to those matters
 4 that they know we are asking about with any indication
 5 from the inquiry as to what their position is on those
 6 so that we can then make submissions that are focused on
 7 the reality rather than on things that may not arise ,
 8 have already have been ruled upon by you, sir , in the
 9 context of the PII application , are in the process of
 10 being dealt with in the context of a restriction order
 11 application , and so that we can deal with the landscape
 12 that really is there rather than to continue to ask the
 13 same questions again that we have already done, which
 14 may or may not actually be the right questions .
 15 You will appreciate , sir , that our concern is not in
 16 any way to undermine in any respect any aspect of
 17 national security . Our concern is that the families
 18 have the confidence that they are going to receive that
 19 rigorous examination of these issues and the achievement
 20 of real answers to the questions that they have at the
 21 end of a process in which they can have confidence .
 22 If we continue to shadow dance around asking the same
 23 questions again and again and not getting answers, that
 24 will not help that process achieve that result .
 25 We do wonder whether, with the greatest of respect ,

1 that the proper way forward would be for the
2 Secretary of State to respond to what we have already
3 asked on a number of occasions by 20 July and for us to
4 respond a week later to that, for then counsel to the
5 inquiry to respond thereafter .

6 If it is thought that it would be helpful for us to
7 put our questions in again then of course we will , but
8 we do think that we ought to respond, with the greatest
9 of respect , to some answers from the Secretary of State
10 rather than to ask our questions all over again as the
11 first stage of the process .

12 SIR JOHN SAUNDERS: Right. Mr Atkinson, I've obviously read
13 all the submissions that have been made by your team
14 during the case. I'm aware these issues have been
15 raised from time to time in different documents.
16 Perhaps as a compromise you could simply sketch out the,
17 whatever the number of them are, headings on which the
18 questions you're asking need response without supporting
19 argument of any sort , which I have seen, so the
20 Secretary of State then has some idea or is reminded of
21 the actual topics that she is required to address in
22 what she's saying . Would that be a suitable compromise?

23 MR ATKINSON: I have no difficulty with that, if it would be
24 helpful and if it will actually gets us some answers,
25 I'm all for it .

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1 SIR JOHN SAUNDERS: Okay. Let's see where we go.
2 Mr Cooper?

3 MR COOPER: Nothing to add, sir.

4 SIR JOHN SAUNDERS: Mr Weatherby?

5 Submissions by MR WEATHERBY

6 MR WEATHERBY: I support Mr Atkinson's submissions. Since
7 receiving the note, we haven't had much of an
8 opportunity to discuss them. I would add that it would
9 be helpful if the inquiry team could give us a plan for
10 chapter 14. The matters that concern us, apart from the
11 list that Mr Greaney's helpfully gone through, are that
12 there should be clarity for all watching, particularly
13 the families . But beyond the families it appears at the
14 moment that it's envisaged that there will be one
15 corporate witness who will cover all of the issues
16 dealing with MI5 and any other security service or
17 security agency that is engaged with these issues . That
18 witness is not a witness of fact who has had any
19 dealings personally , it's a senior manager. What
20 we would seek clarity on at the moment is whether that
21 remains the plan or whether the witnesses of fact that
22 we now understand are going to be called -- whether
23 there will be open evidence from them as well as
24 evidence in closed conditions . It would be helpful to
25 have that clarification .

50

1 If it is still envisaged that all of that evidence
2 will be in closed , as certainly the Government position
3 appears to be from its recent submissions -- I think
4 it's at page 175, paragraph 8 of their submissions --
5 then it would be helpful to know why all of the factual
6 evidence is envisaged to be heard in closed .

7 It's not difficult to envisage why some of it will
8 be in closed , but if , for example, there are
9 interoperability and communication problems that are
10 raised in this case -- and I'm not saying there are or
11 there are not, but if there are interoperability or
12 communication problems between, for example, MI5 and
13 GCHQ, then there is no reason in our submission why
14 matters of that sort of substance cannot be dealt with
15 by factual evidence in open hearing . It would be
16 helpful to have that clarification before we get to the
17 argument.

18 Can I add in terms of the list that Mr Greaney has
19 helpfully outlined that we have been asking also for
20 clarification about the process of any closed or
21 restricted hearings in terms of the gisting or
22 summarisation of evidence . In other processes where
23 there have been closed hearings, there has been gisting
24 or summarising of evidence .

25 Let me just give an example, away from this case,

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1 away from the facts of this case. In a case where, for
2 example, there has been telephone tapping, there may
3 well be a statutory reason why that evidence cannot be
4 given in open hearing . That has not prevented the
5 evidence that has been adduced in closed hearing from
6 being summarised in such a way that doesn't contravene
7 the statutory prohibition on that evidence being heard
8 by gisting the substance of the evidence without its
9 provenance.

10 Sir , we would seek some clarification as to the
11 process by which the inquiry team, of course on your
12 direction , would gist or summarise the closed evidence .
13 But beyond that, we have no difficulty with the proposal
14 to provide a further summary document and we'll do it,
15 of course, in collaboration with the other teams.

16 SIR JOHN SAUNDERS: I'm grateful, Mr Weatherby. The
17 interoperability is a topic which I don't think has
18 actually been mentioned in written documentation,
19 I could be wrong, before and so that's clearly something
20 which could be added as a topic of concern. I think
21 it would helpful at least to have a list of topics of
22 concern and then get the responses from the
23 Home Secretary.

24 Does anyone want to make submissions before I call
25 on Mr Sheldon to reply? Right, Mr Sheldon.

52

1 Submissions by MR SHELDON
 2 MR SHELDON: Thank you, sir. We are quite content with the
 3 proposal set out by counsel to the inquiry and the
 4 suggested directions that they have proposed. We are
 5 equally content, should you consider it appropriate, for
 6 the first direction to be modified so that all that is
 7 provided by the family is in effect a bullet point list
 8 of those points that they wish to be addressed without
 9 the need to repeat submissions that have already been
 10 made elsewhere. We can look up those previous
 11 submissions for ourselves and, as you have seen, sir,
 12 we have sought to address some of them as we have gone
 13 along, including some sets of submissions you have in
 14 your bundle.
 15 Sir, in short, no difficulty at all with the
 16 proposal. Can I make clear, though, that we will need,
 17 even on the basis of a bullet point list, until 27 July
 18 to respond, particularly given the difficulties that
 19 currently surround access to closed material and access
 20 to the relevant buildings in which that material can be
 21 worked upon. So even if the list is a bullet point one
 22 rather than detailed submissions, we will, with respect,
 23 require until 27 July to provide a written response.
 24 I don't think there's anything else I can usefully
 25 add.

1 SIR JOHN SAUNDERS: Thank you, Mr Sheldon.
 2 Mr Greaney?
 3 MR GREANEY: Sir, in light of the helpful submissions, we'd
 4 simply invite you to make the directions that we have
 5 invited you to make subject only to modifying the first
 6 direction to require bullet points as opposed to
 7 substance.
 8 SIR JOHN SAUNDERS: Right. Does anybody want to come back
 9 on any of that?
 10 Reply by MR ATKINSON
 11 MR ATKINSON: Sir, only that the thrust, obviously not very
 12 clearly made, of what I was advising was that the
 13 families have the opportunity to respond to the
 14 proposals when there are any answers from the
 15 Secretary of State. I anticipate that Mr Greaney would
 16 find it helpful to have any response from us before he
 17 makes his submissions, but we're very anxious, so as not
 18 to delay any hearing, to resolve this issue in front of
 19 you, sir. So we have every sympathy with Mr Sheldon
 20 needing more time, but we do invite there being some
 21 time built into the process to allow us to respond to
 22 Mr Sheldon before Mr Greaney has to respond to us.
 23 MR GREANEY: Sir, that's very sensible. May I suggest this:
 24 we're going to have to have a break in about 8 minutes'
 25 time for the stenographer, and we will discuss with

1 counsel for the bereaved families and with Mr Sheldon an
 2 agreed timetable that we can then present to you when we
 3 resume.
 4 SIR JOHN SAUNDERS: Right. We might in fact take the break
 5 now. That may be a convenient time to do it, to discuss
 6 it. This is a complicated issue and it's not going to
 7 be easy to resolve, so clearly I need all the help that
 8 I can get from the advocates with clear and no doubt
 9 helpful submissions.
 10 We will break off for -- I make it 11.22 at the
 11 moment, or 11.23. If we start again at 11.40, does that
 12 give people time to discuss these matters?
 13 MR GREANEY: It does, sir, thank you.
 14 SIR JOHN SAUNDERS: Thank you very much. We'll break off
 15 until then.
 16 (11.23 am)
 17 (A short break)
 18 (11.48 am)
 19 SIR JOHN SAUNDERS: Thank you very much. That was slightly
 20 longer than we intended but for a perfectly good reason.
 21 Mr Greaney.
 22 MR GREANEY: We have agreed a timetable to address the issue
 23 in agenda item 3, so could I set out the dates publicly.
 24 20 July will be the bullet point document of the
 25 bereaved families. 27 July will be the response on

1 behalf of the Secretary of State. 3 August will be the
 2 families' response or rejoinder to that document. Then
 3 on 10 August, CTI will file its submissions on the basis
 4 that there will be a hearing in the week of 10 August,
 5 but not earlier than 12 August, and subject to the
 6 availability of an appropriate closed venue.
 7 SIR JOHN SAUNDERS: Thank you. I'll make those directions.
 8 Mr Sheldon, can I just say this. I have of course
 9 read all the responses that we've had from the
 10 Secretary of State and I'm not sure whether you were the
 11 author of them or not, but it didn't seem to me that
 12 some of them actually directly answered the questions
 13 which were being asked or the points that were being
 14 made. Hopefully with a bullet point format that will
 15 make it easier to ensure everything is being answered.
 16 MR SHELDON: I'm sure it will, sir, thank you.
 17 SIR JOHN SAUNDERS: Mr Greaney.
 18 Submissions by MR GREANEY
 19 MR GREANEY: Turning to the fourth agenda item, namely
 20 general updates and, first of all, disclosure.
 21 As all core participants know, CTI circulates
 22 regular updates on the progress of disclosure, the last
 23 of which is dated 2 June. The next written update on
 24 disclosure is expected within the next few days but what
 25 follows is a high-level summary of what we understand

1 the position to be.
 2 Since the date of the June note, an additional
 3 200 documents, running to 4,500 pages of material , have
 4 been disclosed to all core participants . However,
 5 during that period, a further 16,000 documents, running
 6 to 10,500 pages of material , have been received by the
 7 inquiry .
 8 SIR JOHN SAUNDERS: I think probably 1,600 according to your
 9 note.
 10 MR GREANEY: 1,600, forgive me, quite right, sir . That is
 11 obviously a significant volume and the inquiry legal
 12 team is working hard to ensure that all relevant content
 13 is disclosed to core participants as soon as possible .
 14 This further material includes the following : 900
 15 documents provided by NWS. We were informed by NWS on
 16 1 June that, as a result of a further interrogation of
 17 their computer servers, they had identified a volume of
 18 potentially relevant audio files which had not
 19 previously been disclosed to the inquiry . Over the
 20 course of June, we received schedules listing over
 21 750 calls of potential relevance to the attack, timed
 22 between 2200 hours on 22 May and 0300 hours on 23 May.
 23 From that material, the inquiry requested copies of
 24 approximately 500 audio files and that transcripts be
 25 prepared by NWS as a matter of urgency. We have now

1 received the vast majority of the audio files and
 2 transcripts from NWS and the inquiry legal team is
 3 working at pace to ensure that all potentially relevant
 4 content is disclosed to CPs as swiftly as possible .
 5 To date, so that is to say as of today's date,
 6 we have identified 150 transcripts which will fall to be
 7 disclosed to CPs and the review is ongoing. Further
 8 detail about this will be provided in the written update
 9 to be circulated to CPs in a few days, but NWS has
 10 confirmed that "all potentially relevant audio" has been
 11 recovered in light of the extensive reassurance check
 12 undertaken by the trust .
 13 This is, it goes without saying, a large volume of
 14 materials which was not expected and is, of course,
 15 taking time to review. Since the last disclosure note,
 16 further material has been provided by GMP running to
 17 600 documents, totalling almost 9,000 pages. It
 18 includes materials provided in response to the policing
 19 expert report, including additional witness statements
 20 and exhibits as well as materials in relation to
 21 multi-agency exercises referenced within the expert
 22 report .
 23 245 witness statements, totalling around
 24 1,500 pages, have been provided as a result of
 25 a disclosure assurance exercise conducted by GMP. It is

1 understood this should effectively conclude the
 2 disclosure of all statements to the inquiry save those
 3 that are taken at its instruction .
 4 Having begun to consider the statements provided
 5 under this heading, it has been noted by the inquiry
 6 legal team that many are duplicates or irrelevant and
 7 it's expected that in the result fewer than 50 will fall
 8 to be disclosed .
 9 Approximately 150 documents, 2,000 pages of
 10 material , prepared for and produced by the SIO and the
 11 overview statements have also been provided by GMP along
 12 with materials provided as a result of our enquiries
 13 in relation to GMP's investigation of suspects .
 14 Finally on the issue of disclosure , 750 pages of
 15 material relevant to lessons learned have been disclosed
 16 to core participants in tranche 35.
 17 The inquiry has now disclosed over 460 documents to
 18 the sensitive folder in Magnum, making available to CPs
 19 all content which has to date been disclosed on the open
 20 platform, but with an operationally sensitive redaction .
 21 The content of those documents is of course subject to
 22 further discussion at the hearing scheduled for later in
 23 the month.
 24 Secondly, by way of update, expert reports . The
 25 core participants have now submitted questions or raised

1 issues for consideration by the policing , ambulance,
 2 Fire Service and security experts following service of
 3 their reports. Further material has also been submitted
 4 for their consideration . This has generated substantial
 5 pieces of work.
 6 In terms of the future , the policing , ambulance and
 7 security experts are working towards a deadline that
 8 should result in their responses being provided to all
 9 core participants by 10 August. The Fire Service
 10 experts are working towards a deadline that should
 11 result in their responses being provided to all CPs by
 12 24 July.
 13 In terms of other expert reports, the further
 14 forensic pathology report is currently expected on
 15 31 July. The report of Dr Rees, a consultant
 16 cardiologist , on the particular issues arising
 17 in relation to Mr John Atkinson is currently expected by
 18 14 August, and Dr Wilkinson's second report on
 19 radicalisation is currently expected at some stage in
 20 October 2020.
 21 The third issue upon which an update should be
 22 provided, pen portraits . Progress continues to be made
 23 between the inquiry legal team, the inquiry secretariat
 24 and the bereaved families and we are very grateful for
 25 the ongoing dialogue . Nothing more in our view needs to

1 be said about pen portraits .
 2 Sir, that is all we wish to say by way of update.
 3 If any CP has submissions we would invite them in the
 4 following order: the bereaved families followed by any
 5 other CP.
 6 SIR JOHN SAUNDERS: Would anyone like to say anything?
 7 Mr Cooper?
 8 Submissions by MR COOPER
 9 MR COOPER: May I say, sir, very briefly on the cardiologist
 10 report, as it particularly relates to the family of
 11 Mr Atkinson. We'd obviously be very anxious to receive
 12 that report by 14 August. There may or may not be
 13 further work required on that issue as a result of
 14 receiving it, but I hope that there will be some time
 15 locked into the process and procedure to give us time to
 16 carefully consider what submissions we have to make on
 17 it. That's all we have to say at this stage.
 18 SIR JOHN SAUNDERS: Thank you.
 19 Mr Weatherby? Mr Atkinson?
 20 Submissions by MR ATKINSON
 21
 22 MR ATKINSON: Only to ask the question in relation to the
 23 experts. The significant amounts of further material
 24 from GMP and NWS, I hope, are factored into the
 25 deadlines that those experts have given for when they'll

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1 be able to provide their further reports. Clearly, we
 2 wouldn't want any further emergence of material to
 3 jeopardise those deadlines.
 4 MR GREANEY: I can give Mr Atkinson the reassurance that he
 5 seeks. The further material has been factored into the
 6 dates by which the reports are expected and I can assure
 7 him and assure all core participants that we have been
 8 pressing the experts very hard to get the reports as
 9 soon as possible.
 10 MR ATKINSON: Thank you very much. Also, sir, as a point of
 11 information in relation to pen portraits, the family
 12 teams have had a series of meetings between us, as you
 13 would expect, and we're having one on that very topic
 14 very soon so that we can between ourselves do what
 15 we can to make that process as effective and as smooth
 16 as possible.
 17 SIR JOHN SAUNDERS: I'm very grateful for that.
 18 Mr Greaney, there is obviously -- the timetable for
 19 the disclosure and making sure everything is done in
 20 accordance with the timetable is obviously vital. The
 21 last thing we want is disclosure being made at a very
 22 late stage without people having a proper chance to
 23 consider it, but I have no doubt all the core
 24 participants who are involved in disclosure will bear
 25 that very much in mind. We have had extra time, as it

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1 happens, and there shouldn't be any reason why the
 2 disclosure shouldn't be completed properly.
 3 MR GREANEY: Sir, we agree entirely with that and we are
 4 certain that the core participants will have heard and
 5 listened.
 6 SIR JOHN SAUNDERS: Right. Does anyone else want to make
 7 any submissions about what's been said about disclosure?
 8 Thank you. Mr Greaney.
 9 Submissions by MR GREANEY
 10 MR GREANEY: Sir, I will proceed to deal with the final
 11 three agenda items, all of which are short.
 12 Item 5, opening statements. There is little to add.
 13 The direction in relation to opening statements was the
 14 subject of an email from STI on 30 June at 5.23 pm.
 15 A deadline for receipt by STI from CPs of 10 am on
 16 28 August 2020 has been set. I add only that the need
 17 for sensitivity checking means that we will need to have
 18 a dialogue with a small number of organisational CPs to
 19 seek their opening statements just a little earlier, but
 20 nothing more needs to be said about that at this
 21 hearing.
 22 Sir, I don't know if any CP wishes to make any
 23 submission.
 24 SIR JOHN SAUNDERS: Mr Weatherby?
 25

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1 Submissions by MR WEATHERBY
 2 MR WEATHERBY: Yes, in a couple of sentences, can I just say
 3 that I fully understand the reason for the further delay
 4 with opening statements, but there really is no wriggle
 5 room now in terms of the start date of the inquiry, and
 6 therefore I hope that none of the organisational CPs
 7 will have any further need for it to go back any
 8 further.
 9 SIR JOHN SAUNDERS: I agree with that entirely. Thank you.
 10 Submissions by MR GREANEY
 11 MR GREANEY: As do we.
 12 If no one else wishes to make a submission on
 13 item 5, we'll move to item 6: applications and hearing
 14 on restriction orders and anonymity.
 15 Simply to recap where we are, sir, properly at any
 16 rate, a hearing will take place, as we've said a number
 17 of times during this hearing, on 23 July. At that
 18 hearing a number of issues will be dealt with:
 19 (1), restriction orders in relation to operationally
 20 sensitive material.
 21 (2), anonymity orders.
 22 (3), as we have indicated earlier, the delay to the
 23 live stream and related issues. We can add that we
 24 anticipate that that hearing, the hearing on 23 July,
 25 will be a remote hearing.

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1 (4), finally on this topic, a separate hearing will
 2 be needed to address the MI5 issues and as, sir,
 3 you have now directed that will take place in
 4 mid-August.
 5 That is all we wish to say about this topic.
 6 SIR JOHN SAUNDERS: Right. Just before we go on, one matter
 7 which a number of people -- a number of advocates have
 8 made the point about the importance of there not being
 9 a delay as far as their particular clients are concerned
 10 and them having a live link or a live stream. I would
 11 just like submissions from people to explain to me why
 12 it's so important to have it actually at the time rather
 13 than delayed for 10 minutes. We've had it from the
 14 press and we've certainly had it from some of the
 15 families. I am not saying I have come to any view about
 16 that whatsoever, I would just like it explained to me
 17 why that is. (Pause). Thank you.
 18 Does anyone else want to make any comments? Right.
 19 Mr Greaney.
 20 Submissions by MR GREANEY
 21 MR GREANEY: Sir, I'll turn then to deal with the final
 22 agenda item, the referral by GMP to the Health and
 23 Safety Executive.
 24 By a letter dated 19 June, GMP wrote to the Health
 25 and Safety Executive, indicating that:

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1 "The disclosure of the inquiry's security expert
 2 report causes some concern in relation to potential
 3 health and safety offences".
 4 Following receipt of a letter from the HSE
 5 in relation to its jurisdiction, GMP then requested
 6 permission from you, sir, to share the security expert
 7 report with the HSE. CPs were informed by STI that
 8 a provisional view had been taken by the inquiry legal
 9 team that a complete package should be shared once
 10 outstanding comments and an addendum report had been
 11 received from the security experts.
 12 Since the expression of that provisional view by the
 13 inquiry legal team, the following submissions have been
 14 received from CPs. The bereaved families represented by
 15 Hogan Lovells make no positive submission as to whether
 16 it's provided now or later, but encourage the inquiry
 17 legal team to engage with those who might be affected.
 18 The bereaved families represented by Slater & Gordon
 19 submit that there is no disadvantage in the material
 20 being provided now. The bereaved families represented
 21 by Addleshaws indicate that they have no objection to
 22 the report being disclosed.
 23 ShowSec agree with the provisional view of the
 24 chairman and submit that the report should not be
 25 provided now and they further submit that the inquiry

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1 should not be involved in the selection of material to
 2 be provided but instead should provide an index to the
 3 HSE. SMG endorses the provisional approach indicated on
 4 behalf of the inquiry.
 5 Sir, our submission is a short one, and it is that
 6 now is not the time to provide the requested report. We
 7 submit that the fact that the security experts are
 8 in the process of considering comments by CPs, which is
 9 going to generate further material from them and result
 10 in an addendum report, means that it would be premature
 11 to provide the report, which may be the subject of
 12 addition or amendment in light of the observations
 13 submitted by CPs.
 14 Given the lack of objection and GMP's positive wish
 15 to provide the report to the HSE, we submit that once
 16 the report, the responses to the questions and the
 17 addendum report are available, the complete package
 18 should at that stage be provided. Sir, that's all
 19 we have to say about the issue. Could we invite
 20 submissions, if there are any, from counsel to ShowSec
 21 and then SMG, followed by the bereaved families,
 22 probably Mr Cooper first, followed by any other CPs?
 23 SIR JOHN SAUNDERS: Just before we do that, Mr Greaney, if
 24 your submission were to be followed, what is the date,
 25 the likely date we are talking about when the report --

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1 how much delay is involved from now before the report
 2 would get to them?
 3 MR GREANEY: We anticipate that the further report of the
 4 security experts will be provided to CPs by 10 August,
 5 so that would be the date, or thereabouts, that the
 6 package, as I've described it, would also be supplied to
 7 the HSE. So we are talking about a delay of about
 8 4 weeks.
 9 SIR JOHN SAUNDERS: The second point is I believe I have
 10 read submissions from someone which indicates that the
 11 report should not be released until the end of the
 12 inquiry and indeed not until I have written my report.
 13 MR GREANEY: Mr de la Poer will assist me with from whom
 14 those submissions have been received, but certainly
 15 a core participant has submitted that this all ought to
 16 await the outcome of the oral evidence hearing.
 17 SIR JOHN SAUNDERS: Right.
 18 MR GREANEY: We would not support such a delay, sir, as will
 19 be apparent from the submissions we have made.
 20 SIR JOHN SAUNDERS: Yes, thank you.
 21 So Mr Gillespie, are you suggesting he make
 22 submissions first?
 23 MR GREANEY: If he has any submissions, yes.
 24 I think we can probably take silence as an
 25 indication that he doesn't wish to make any. It turns

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1 next to Mr O'Connor on behalf of SMG if he has any
2 submissions, but I'm not anticipating that he will, but
3 he ought to have the opportunity. Again, we'll take
4 silence of an indication that he has none.

5 We will now invite Mr Cooper to make any submissions
6 that he wishes to make given that it was on behalf of
7 his clients that a stronger opinion was expressed.

8 SIR JOHN SAUNDERS: Right. Mr Cooper.

9 Submissions by MR COOPER

10 MR COOPER: Thank you, sir. I'm sorry to break the thread
11 of silence, but I do have some very brief submissions,
12 as has been indicated. We do submit that there's no
13 reason that the Health and Safety Executive should not
14 be provided with the documentation now as (1) I am
15 probably not the only one who formerly prosecuted for
16 the Executive and I know full they are well capable of
17 absorbing material on an ongoing basis; that's what they
18 do regularly as part of their work.

19 Given the short time periods we have now, that we've
20 all been referring to during the course of this hearing,
21 we submit in that context that a four-week delay is in
22 fact significant. It's not that we're seeking to
23 provide the material to an individual or an organisation
24 not well-versed in dealing with piecemeal provision of
25 documentation, so in our submission there's absolutely

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1 no reason why the Health and Safety Executive can't get
2 the material now. We understand that it would have been
3 helpful for them to have it as of one document, but
4 sometimes that doesn't happen. They're a professional
5 organisation with competent people working within it.
6 There's no reason, we respectfully submit, for
7 Mr Greaney to be so concerned as to them getting it
8 early.

9 Therefore it's our submission that there is no
10 reason why they should not get it. They are competent,
11 they are professional, they deal with piecemeal
12 provision, and 4 weeks is a significant period of time.
13 So our submission is that they should be provided this
14 material virtually immediately or as soon as possible.
15 Thank you.

16 SIR JOHN SAUNDERS: Thank you.

17 Mr Weatherby? Mr Atkinson?

18 Submissions by MR ATKINSON

19 MR ATKINSON: Sir, just to clarify what we meant in our
20 written submissions on this point. Our concern is that
21 any HSE investigation should not affect the way in which
22 witnesses give evidence to the inquiry or the degree of
23 cooperation from those CPs who may be affected by any
24 such investigation, and indeed that that investigation
25 in no way delays this inquiry. What we expressed the

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1 hope of in our note is that counsel to the inquiry would
2 liaise with those CPs who might be affected by any HSE
3 investigation to ascertain in advance that there is not
4 going to be any problem in relation to their cooperation
5 or in relation to the start date as a result of anything
6 the HSE do or do not do. But beyond that, I have
7 nothing to add.

8 MR GREANEY: Again, Mr Atkinson can be reassured that
9 we have had those discussions and will continue to have
10 them with very much the points he's made in mind.

11 SIR JOHN SAUNDERS: Right, thank you.

12 Is there anyone else who wishes to make submissions
13 on this point? Right.

14 MR GREANEY: Sir, I'm not going to reply to Mr Cooper's
15 submission. The issues are there for you to decide.
16 I will confirm that you are correct in your recollection
17 that a core participant has suggested delaying provision
18 of materials for a substantial period. It's page 104 of
19 the hearing bundle and it's a submission made on behalf
20 of ShowSec. I can add that Mr Gillespie has confirmed
21 that he does not wish to make any submissions and
22 ShowSec do not seem therefore to be pressing that
23 particular argument very strongly.

24 SIR JOHN SAUNDERS: Thank you very much.

25 Is that the end of the business for the day?

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1 MR GREANEY: It is, sir.

2 SIR JOHN SAUNDERS: Does anybody wish to raise anything else
3 before we adjourn? Right. Thank you very much for
4 everyone's contribution and, as I have said before, all
5 the hard work which is going in to making sure this
6 inquiry can start on time and be a proper inquiry. So
7 thank you to all of you who have done so much work.
8 Thank you.

9 (12.10 pm)

10 (The hearing adjourned)

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