

# OPUS2

Manchester Arena Inquiry

Day 51

January 14, 2021

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1 Thursday, 14 January 2021  
 2 (10.30 am)  
 3 SIR JOHN SAUNDERS: Good morning.  
 4 Submissions by MR GREANEY  
 5 MR GREANEY: Sir, the oral evidence hearings of this  
 6 inquiry, as you know as well as everybody, started on  
 7 7 September of last year amid the coronavirus pandemic.  
 8 We continued with in-person hearings with legal  
 9 representatives present and family members present, some  
 10 in the hearing room, some in the Spinningfields annexe  
 11 and some remote, and we did so continuously until  
 12 17 December, generally sitting for long and demanding  
 13 hours.  
 14 On breaking shortly before Christmas, our intention  
 15 was to resume on 12 January, the Monday of this week,  
 16 and it was our intention to resume with chapter 9, the  
 17 events of the day, taking place in the first week,  
 18 followed by chapter 10, the emergency response,  
 19 beginning on 18 January, so next Monday.  
 20 Much work has been done by the inquiry legal team  
 21 and the core participants over the Christmas break to  
 22 ensure that only necessary evidence is heard during  
 23 chapter 10. So in the circumstances, all concerned  
 24 approached the restart with confidence that we would  
 25 continue to make progress from the beginning of this

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1 year.  
 2 Then of course, on the evening of 4 January, the  
 3 Prime Minister announced the third national lockdown.  
 4 He did so on the basis that (inaudible: distorted) were  
 5 rising exponentially and there is a material risk of  
 6 healthcare services being overwhelmed. The restrictions  
 7 thereafter imposed require that the public stay at home  
 8 and go out only for essential reasons. Primary and  
 9 secondary schools have, of course, closed and will  
 10 remain so until 15 February at the earliest.  
 11 Against that background, on the evening of  
 12 5 January, so the evening after the Prime Minister's  
 13 announcement, the solicitor to the inquiry emailed all  
 14 core participants. In the email Mr Suter stated as  
 15 follows:  
 16 "The chairman has considered the impact of the new  
 17 restrictions and the feasibility and appropriateness of  
 18 continuing with the oral hearings. In particular, the  
 19 chairman is cognisant of the fact that there is a new  
 20 strain of the virus that is said to be up to 70% more  
 21 transmissible and that schools are now closed with the  
 22 impact that that has on childcare arrangements for many.  
 23 Balanced against this [added Mr Suter] is the vitally  
 24 important work of the inquiry and ensuring that, as far  
 25 as is possible, the hearings are able to continue."

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1 Mr Suter's email indicated that for good reason  
 2 it would not be possible to resume on 12 January and  
 3 that chapter 9 would therefore be heard later in our  
 4 process, principally so that chapter 9 could be  
 5 conducted with the dignity that the deceased and the  
 6 survivors are entitled to expect and also so that proper  
 7 consultation could take place with Public Health England  
 8 and a risk assessment prepared in respect of the  
 9 circumstances of our restart.  
 10 Certain provisional proposals were made by Mr Suter  
 11 in his email about resuming in-person hearings from  
 12 18 January, but with a significantly reduced capacity  
 13 in the hearing room in Manchester and with sitting two  
 14 and a half days a week so as to respect the difficulties  
 15 that some participants would have in managing their  
 16 childcare responsibilities in the changed situation. The  
 17 email proposed that there would in any event be a review  
 18 in the week of 15 February and submissions were sought  
 19 from any core participants who wished to make them by  
 20 the morning of 11 January.  
 21 As a result, submissions were received from each of  
 22 the four family groups and also from GMP, BTP,  
 23 NHS England, GMCA, NWFC and NWAS.  
 24 The inquiry legal team has taken those submissions,  
 25 all of which, may we say, were constructive, into

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1 account. We've also taken into account the content of  
 2 advice that we have received via the inquiry secretariat  
 3 from Public Health England North-west, from the  
 4 Manchester City Council Director of Health, and from the  
 5 Manchester City Council environmental health officer.  
 6 We have obviously also had to act on the basis of  
 7 the risk assessment that has been made by the  
 8 secretariat in light of the advice that the secretariat  
 9 has received.  
 10 A note summarising the advice received and the risk  
 11 assessment was circulated to all core participants  
 12 yesterday along with a document from the hub dealing  
 13 with the availability of support and also the  
 14 submissions of core participants and a draft running  
 15 order for the period from this Monday until the  
 16 half-term break.  
 17 Sir, in a moment we'll set out the inquiry legal  
 18 team's proposal and it is no more than a proposal for  
 19 your consideration for the period from this Monday to  
 20 22 February. May we say that we have not found it easy  
 21 to formulate that proposal.  
 22 Before we set out what it is, we wish to emphasise  
 23 that we've sought to achieve a balance between a number  
 24 of factors. The principal factors being and I'll list  
 25 them, not in order of importance.

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1 1. The need to achieve effective participation , in  
 2 particular on the part of the bereaved families. Sir,  
 3 in making that point we recognise that although the  
 4 bereaved families share the experience of having  
 5 suffered a dreadful loss on 22 May 2017, their views  
 6 about how we should proceed from this point on are not  
 7 necessarily the same, indeed it's clear they are not the  
 8 same. That, in our view, is hardly surprising and we  
 9 wish to say that every view is important.

10 2. In terms of factors , the desire shared by  
 11 everyone that we maintain momentum and enable you, sir,  
 12 to achieve your aim of publishing the three volumes of  
 13 your report on the dates you hope to meet. That, after  
 14 all , is how recommendations will be made at the earliest  
 15 possible stage and that, of course, is important.

16 3. The need to ensure that evidence is adduced in  
 17 a way that best enables you, sir , to reach your  
 18 conclusions and therefore make your recommendations.

19 4. The need to ensure that the hearing is conducted  
 20 in a way that is safe for to all participants , including  
 21 witnesses who attend in person.

22 5. The need to ensure that witnesses and the  
 23 bereaved and survivors have appropriate support during  
 24 the hearing.

25 Against that background, I'll indicate what our

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1 proposal is. We propose that the inquiry should resume  
 2 with in-person hearings at the Magistrates' Court on  
 3 18 January, so next Monday, and that we should begin  
 4 with chapter 10. We consider it is important to restart  
 5 as soon as possible and to do so in person. Attendance  
 6 in the hearing room will have to be severely limited ,  
 7 indeed, sir , it will be limited to you, two members of  
 8 CTI, one member of STI, the witness and an usher. The  
 9 two annexes, so the family annexe and the media annexe,  
 10 will have to close.

11 We will generally sit two and a half days each week.  
 12 Having consulted, we are entirely satisfied -- I'm just  
 13 going to pause for a moment, sir.

14 (Pause)

15 I have just been told by Mr de la Poer that contrary  
 16 to our understanding, and indeed the assurance we were  
 17 given, YouTube is not running live but instead is  
 18 running 10 minutes before time. Having consulted with  
 19 Mr Suter, our view is that we ought to pause for  
 20 10 minutes to enable YouTube to catch up. I'm very  
 21 sorry about that, sir , but I'm not anticipating that the  
 22 hearing this morning will in any event be a particularly  
 23 long one. At least that's my hope. Having said that  
 24 and subject to any view to the contrary that you have,  
 25 I'll ask that we now pause.

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1 SIR JOHN SAUNDERS: Okay. So 10 minutes?  
 2 MR GREANEY: 10 minutes, sir, yes.  
 3 SIR JOHN SAUNDERS: Thank you.  
 4 (10.39 am)  
 5 (A short break)  
 6 (10.51 am)  
 7 MR GREANEY: Sir, I hope you heard what Mr Suter had to say,  
 8 namely that those who have been watching on YouTube have  
 9 experienced a delay, but they have not missed anything  
 10 and they have now caught up.  
 11 SIR JOHN SAUNDERS: Okay, thank you very much.  
 12 MR GREANEY: As a result, it is not necessary for me to  
 13 repeat anything that I have said, but I will begin our  
 14 proposal, the inquiry legal team's proposal again.  
 15 It is in the following terms.  
 16 1. We propose that we should resume with an  
 17 in-person hearing at the Magistrates' Court in  
 18 Manchester this Monday coming, that is to say  
 19 18 January, and we further propose that we should begin  
 20 with chapter 10.  
 21 As I indicated, we consider it's important to  
 22 restart as soon as possible and, moreover, to do so in  
 23 person. Attendance in the hearing room itself will need  
 24 to be severely limited in light of the advice that  
 25 we have received and indeed will be limited, sir , to

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1 you, two members of CTI, to one member of STI, to  
 2 the witness, and to a single usher. The two hearing  
 3 annexes, so the family annexe and also the media annexe  
 4 will have to close. Generally, we will sit for two and  
 5 a half days each week, so Monday and Tuesday and then  
 6 conclude at about lunchtime on Wednesday.  
 7 Having consulted, we are entirely satisfied that  
 8 that arrangement is necessary to ensure that all are  
 9 able to participate effectively given the increased  
 10 requirements for the provision of childcare.

11 Unlike before Christmas, we will sit not at 9.30 am  
 12 but instead at 10.00 am and there will be regular breaks  
 13 throughout the course of the day to avoid people being  
 14 overloaded and also to permit instructions to be given.  
 15 Each morning at 9 am, there will be a virtual  
 16 meeting between the inquiry legal team and the bereaved  
 17 families at which the evidence to be heard that day will  
 18 be summarised and, in particular, any distressing parts  
 19 will be identified . Furthermore, as has generally been  
 20 done in any event, such evidence, that is to say  
 21 distressing evidence, will also be signposted throughout  
 22 the course of the day.  
 23 Virtual rooms will be made available for the  
 24 families at various stages during the day and at the end  
 25 of the day. That will enable the families to decompress

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1 and to provide instructions. May we emphasise that if  
 2 further time is needed during the day to provide  
 3 instructions, that is to say time outside of the times  
 4 of the ordinary meetings, that time should be provided  
 5 because inevitably it will be more difficult for the  
 6 families to provide instructions to their lawyers in the  
 7 changed circumstances.

8 Importantly, efforts are underway to ensure that the  
 9 hub and Cruse Bereavement are able to provide support to  
 10 those watching remotely.

11 In terms of the content of the evidence when we  
 12 restart, what we propose is that the first week, so 18  
 13 to 20 January, will involve an opening to chapter 10 by  
 14 CTI followed by the introduction of the emergency  
 15 response sequence of events.

16 The second week, so 25 to 27 January, will involve  
 17 the chapter 7 closing submissions. That will be an  
 18 entirely virtual hearing.

19 Thereafter, we will hear the chapter 10 evidence,  
 20 albeit evidence that is not substantially controversial,  
 21 following on from that date between 1 February up until  
 22 the half-term break.

23 We have circulated, albeit it was only circulated  
 24 yesterday, a list of proposed witnesses for those final  
 25 2 weeks of that stage, so the 2 weeks from 1 February.

1 That list, we recognise, will need to be the subject of  
 2 discussion and we acknowledge that it may be that  
 3 in relation to some witnesses, some parts of their  
 4 evidence can be given but other parts cannot at this  
 5 stage.

6 As Mr Cooper has indicated in his written  
 7 submissions, I made clear to him in our discussions,  
 8 just as I made clear to the other legal representatives  
 9 to whom I've spoken, that this approach, that is to say  
 10 the approach I have just set out, will take us to the  
 11 half-term break in the week of 15 February and, as  
 12 matters stand, no later.

13 During that week, the half term week, it will be  
 14 important, indeed important in the highest degree, that  
 15 we review the position. We would naturally thereafter  
 16 be moving into more controversial evidence and we, as  
 17 the inquiry legal team, entirely understand that  
 18 different issues arise from that point, or may do, and  
 19 difficult decisions may therefore arise at that stage  
 20 depending upon the position nationally and locally.

21 Sir, that is our proposal for your consideration.  
 22 We hope it's clear to you and to the core participants.  
 23 Subject to any questions that you have, we'll now invite  
 24 oral submissions from those who wish to make them.  
 25 SIR JOHN SAUNDERS: Thank you very much, Mr Greaney.

1 MR GREANEY: Sir, we circulated a list of speakers yesterday  
 2 evening and I was therefore going to invite Mr Smith  
 3 Queen's Counsel on behalf of North West Fire Control to  
 4 make any submissions orally that he wishes to.

5 MR SMITH: Thank you.

6 SIR JOHN SAUNDERS: Mr Smith, before you start, can I say,  
 7 I seem to remember when we had a similar discussion at  
 8 a much earlier stage of this inquiry, you actually  
 9 suggested that a good time to start the inquiry would be  
 10 this spring on the basis that you estimated that the  
 11 pandemic might be over by then. Hopefully you're going  
 12 to be proved correct on that assessment.

13 Submissions by MR SMITH

14 MR SMITH: Sir, can I begin by saying that North West Fire  
 15 Control has had an opportunity to review the submissions  
 16 made by the inquiry legal team and the attached  
 17 timetable that was circulated yesterday. Our written  
 18 submissions are at page 29 of the hearing bundle, but in  
 19 short, we remain of the view that the proposals made by  
 20 the inquiry legal team are both balanced and appropriate  
 21 in the light of the current health crisis.

22 North West Fire Control's position, therefore, is that  
 23 the inquiry should make such progress as it can and that  
 24 the inquiry legal team's timetable makes suitable  
 25 provision for this.

1 There are just two issues which we wish to raise  
 2 shortly in oral submission. The first of these is the  
 3 attendance of witnesses in person and the second is the  
 4 duration of the proposed current arrangements.

5 We sought to make the point in written submissions  
 6 that there should be no witnesses in person and that  
 7 witnesses should give evidence remotely. That was  
 8 before seeing the most recent information provided by  
 9 the inquiry legal team within the hearing bundle. We  
 10 note in particular, sir, that you wish to hear as much  
 11 evidence as possible from witnesses attending in person.

12 A review of the timetable demonstrates that the  
 13 witnesses who are to be called up to and including  
 14 10 February are all witnesses with considerable  
 15 professional experience and we have no further  
 16 observations to make in respect of these witnesses.  
 17 There appears to be no reason why they should not be  
 18 called to give evidence in person and individual  
 19 circumstances must be a matter for the inquiry legal  
 20 team to manage.

21 However, you will note that we have raised the  
 22 question, which is sub-paragraph 8 at page 31 of our  
 23 submissions, of whether organisational core participants  
 24 need to be consulted about the risks of transmission in  
 25 the context of their employees giving evidence and the

1 potential consequences for that organisation's  
2 operations.

3 The advice that the inquiry has received is very  
4 clear and of course we make no further reference to it  
5 here, but we would like to flag this up now as something  
6 that may have to be discussed at the proposed virtual  
7 hearing on 16 February next. The issue that may have to  
8 be considered is whether there should be a risk  
9 assessment for circumstances in which a number of  
10 employees are called sequentially and may then be  
11 expected to return to their working environment with the  
12 attendant risks attaching thereto.

13 Clearly, this will be entirely dependent on the  
14 situation in a month's time, but it may require  
15 a continued focus on remote working and it may require  
16 that some witnesses give their evidence remotely. We  
17 wanted to flag this up now as a matter that may have to  
18 be considered in due course, but I want to make it clear  
19 that if we are to make submissions on behalf of  
20 North West Fire Control, who, as you know, operate  
21 a control room with a limited number of employees  
22 engaged on a 24-hour basis — if we are to make  
23 submissions on behalf of North West Fire Control  
24 in relation to their employees who are to be witnesses,  
25 those submissions will be supported, I can assure you,

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1 with respect, by clear and cogent reasons if we are to  
2 contend that in the case of some or all of them remote  
3 working by way of evidence should be adopted.

4 As far as the second point is concerned, at least  
5 one core participant considers that the proposals that  
6 have been made by the inquiry legal team are for  
7 a strictly limited duration. The point that I want to  
8 make on behalf of North West Fire Control is that they  
9 may not be. This situation, of course, needs to be kept  
10 under review and we invite you not to rule out the  
11 prospect that the inquiry may have to continue with  
12 remote working for the foreseeable future and throughout  
13 the whole of chapter 10. I say no more about it now  
14 because clearly that will depend on developments in the  
15 current health crisis, both nationally and locally.

16 So in summary, therefore, we support the proposals  
17 made by the inquiry legal team in their entirety. They  
18 represent a balanced and responsible means of making  
19 progress with the inquiry's task at this stage and the  
20 position after mid-February will need to be reviewed  
21 in the light of information available at the time and  
22 a move to remote working with some witnesses may have to  
23 be considered.

24 That is all we want to draw to your attention today,  
25 sir, unless there's anything I can assist you about.

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1 SIR JOHN SAUNDERS: They're obviously very valid points that  
2 you make and clearly, any risk assessment which is done,  
3 and we'll need to do continuous risk assessments, will  
4 need to take into account what you have said about  
5 people working in the same office and going back to the  
6 same office and how that affects the risk to them. And  
7 also I certainly take on board the fact that these  
8 matters need to be kept under continuous review and  
9 there to be a continuous risk assessment going on, which  
10 I assure you I intend should happen. Thank you very  
11 much for your submissions.

12 MR GREANEY: Sir, in a moment I will invite Mr Warnock on  
13 behalf of GMCA to address you, but first of all can we  
14 reassure you, sir, and reassure the core participants,  
15 that in respect of each witness who is proposed should  
16 give evidence in person, a specific risk assessment will  
17 be carried out. And indeed in respect of each member of  
18 your team who it's proposed should be in Manchester in  
19 person, a risk assessment has already been carried out.

20 Having made those remarks, sir, we will invite  
21 Mr Warnock to make those submissions he wishes to make.

22 SIR JOHN SAUNDERS: Thank you. Mr Warnock.

23 Submissions by MR WARNOCK

24 MR WARNOCK: Good morning, sir. There seems to be a measure  
25 of broad agreement that the inquiry can proceed with the

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1 hearings which are scheduled for the next 2 weeks  
2 remotely: that's CTI's opening, Inspector Russell, and  
3 the oral submissions on chapter 7. We certainly support  
4 that approach.

5 For what happens after those 2 weeks, we  
6 respectfully submit that perhaps the time has come to  
7 make the difficult decisions which Mr Greaney has  
8 indicated may be necessary in the middle of February and  
9 that really, and we submit this with some reluctance,  
10 the only real choices are between taking the inquiry  
11 fully remote until circumstances change again or  
12 adjourning.

13 I say it is with some reluctance that we have  
14 reached that conclusion and make that submission. We  
15 appreciate very much the considerable efforts which your  
16 inquiry team have made to try and find a middle way.  
17 But having considered carefully the risk assessment and  
18 the planned order of hearings through until the  
19 half-term break, we respectfully submit that any benefit  
20 from proceeding on the latest proposed timetable is  
21 likely to be outweighed by the disbenefits. In a sense,  
22 the proposal puts the inquiry into a form of holding  
23 pattern, but does so at a cost of witnesses having to be  
24 recalled and raises real practical issues for those who  
25 aren't actually based in Manchester.

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1 For the period after the following 2 weeks, the plan  
2 envisages calling eight witnesses, that's from  
3 1 February, three of whom it is envisaged will have to  
4 come back and complete their evidence on a later  
5 occasion.

6 Experience suggests that no matter how well intended  
7 and how well planned, a witness called twice is usually  
8 a witness whose evidence is twice as long. Moreover,  
9 being called twice increases the stress for witnesses  
10 who, of course, wish to assist this inquiry and  
11 recognise its importance, but also need some finality in  
12 this process.

13 We note the terms of the risk assessment and in  
14 particular the need to avoid travel between regions and  
15 to severely restrict those in attendance at the inquiry.  
16 Witnesses, we note from the risk assessment, will be  
17 asked whether in the previous 14 days they have  
18 travelled out of the area. I can say immediately that  
19 two of the witnesses it is proposed to be called from  
20 the Fire Service will indeed have been outside the area  
21 within the 14-day period, indeed within just days of  
22 when it is scheduled they are to be called, because they  
23 have professional duties outside the area at the Fire  
24 Training College in the west of England.

25 We also note from what counsel to the inquiry has

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1 said this morning that it seems witnesses who do attend  
2 in person during this period, unlike others who attend  
3 later, will not have representatives of the core  
4 participant who looks after their interests present  
5 at the Magistrates' Court. Indeed, there would indeed  
6 be problems with having representatives present in the  
7 current climate, not least because both myself and  
8 junior counsel are based in the London area. So we do  
9 question, sir, how much progress the inquiry is actually  
10 likely to make in taking this course, sitting two and  
11 a half days a week with three of the witnesses out of  
12 the eight it proposes to call in that period having to  
13 be called again in any event.

14 A number of parties have raised the question of  
15 adjourning the tribunal to half-term and reappraising  
16 the situation then, and that is certainly a possibility,  
17 though the possibility of restrictions being lifted in  
18 any significant way by mid-February seems more of a hope  
19 than an expectation, particularly having regard to what  
20 the Prime Minister said in the House of Commons  
21 yesterday and having regard to the current ongoing state  
22 of the emergency, in particular the emergency for the  
23 Health Service. It may be more likely that restrictions  
24 will be lifted by Easter.

25 The time has come, we submit, to consider going

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1 fully remote. We recognise that that is far from ideal.  
2 We recognise the problems which have been identified in  
3 submissions by counsel to the inquiry, including the  
4 submissions, in particular the submissions made in the  
5 written document of 20 March 2020, which is in the  
6 hearing bundle. However, the situation has changed in  
7 at least two significant ways since last March.

8 Firstly, we have all had a steep learning curve, but  
9 learning it has nonetheless been, and become much  
10 more adept at using remote platforms in the last year.  
11 What can be done remotely has improved greatly and  
12 indeed trials are now being held remotely up and down  
13 the country in cases where it would never have been  
14 dreamt of doing so last March. Other inquiries have  
15 operated remotely in full or in part or are now planning  
16 to do so, and we've referenced in our written submission  
17 the current plans of the Grenfell Tower Inquiry, which  
18 has suspended original hearings but is planning to go  
19 remote, also the Infected Blood Inquiry. We note that  
20 Mr Gibbs, in his submission for the British Transport  
21 Police, has also drawn attention to the Undercover  
22 Policing Inquiry. All of these inquiries raise matters  
23 of great sensitivity, all in the light of the  
24 circumstances in which we are facing going remote or  
25 largely remote.

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1 The second major change is that in March last year,  
2 it was thought that this crisis might be short-lived,  
3 and whilst the vaccines which are being rolled out  
4 certainly give cause for hope, we clearly have  
5 a difficult winter ahead, potentially continuing into  
6 the spring and possibly another difficult winter ahead  
7 next year. As the Grenfell Tower Inquiry said, having  
8 previously ruled out remote hearings in that inquiry  
9 last year, the time had come when the choice was really  
10 between going remote and no hearing at all, in which  
11 case going remote was clearly the preferable option.

12 So sir, those are our submissions and in making them  
13 I do emphasise we do not underestimate and we do  
14 appreciate the efforts which particularly Mr Suter and  
15 the counsel to the inquiry team have been making to try  
16 and keep this inquiry on the road. But as I say, we do  
17 submit whether in reality the real choice is now to  
18 adjourn, most likely actually until Easter, or to  
19 proceed fully remotely, and of those options we submit,  
20 although far from ideal, going remote is the better.

21 SIR JOHN SAUNDERS: Okay, thank you very much, Mr Warnock,  
22 they are very helpful submissions. We will bear all  
23 those matters very much in mind.

24 MR GREANEY: Sir, next Ms Roberts on behalf of NNAS.

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1 Submissions by MS ROBERTS  
 2 MS ROBERTS: Sir, good morning. Can I thank Mr Greaney,  
 3 Mr Suter and the entire inquiry legal team for the care  
 4 and consideration they have given to submissions made by  
 5 the North West Ambulance Service and by all core  
 6 participants. We note with gratitude the draft running  
 7 order which accommodates the intense pressure under  
 8 which NAWAS is currently operating.  
 9 Sir, we served our submissions on Monday of this  
 10 week -- they're at pages 24 to 26 of the bundle -- but  
 11 given that the submissions have largely been  
 12 accommodated by the inquiry team, subject to you wishing  
 13 me to do so, sir, I don't propose to go into those  
 14 submissions in any, or indeed at all, length.  
 15 SIR JOHN SAUNDERS: I have read them, as I have read all the  
 16 written submissions and I've obviously read the ones you  
 17 put in as well.  
 18 MS ROBERTS: Thank you very much, sir.  
 19 We are in agreement with what is suggested by the  
 20 inquiry legal team and we applaud the care with which  
 21 they have approached the difficulties we are all to face  
 22 in the coming weeks.  
 23 Sir, it may be helpful to give you and everyone else  
 24 an update following our communication with NAWAS this  
 25 morning. We are, as an organisation, facing

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1 unprecedented challenges due to the national health  
 2 emergency caused by COVID-19. The situation has  
 3 deteriorated in the short space of time since our  
 4 submissions were lodged on Monday of this week. And  
 5 whilst NAWAS continue to be able to provide its services,  
 6 we wish to draw to the inquiry's attention the  
 7 following.  
 8 The pandemic has significantly reduced ambulance  
 9 staff available to deploy to front line duties. 18% of  
 10 staff are currently unavailable, the vast majority of  
 11 these being ill or self-isolating because of COVID. The  
 12 vast majority of staff who have been identified to be  
 13 called as witnesses in this inquiry, including senior  
 14 and high-ranking personnel, are fully engaged in  
 15 responding on the front line.  
 16 The trust is now at the highest level of  
 17 preparedness, that is REAP level 4 -- REAP is resource  
 18 escalation action plan -- and, recently, information was  
 19 provided by NAWAS to the media and it warrants, if I may  
 20 say so, repetition. It's as follows:  
 21 "REAP levels are nationally set measurements of  
 22 activity used by all ambulance services in the UK. The  
 23 higher the number, from 1 to 4, the more pressure the  
 24 service is under. Normally, levels are deemed to be at  
 25 stages 1 or 2. For the duration of the pandemic, NAWAS

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1 has been operating between 2 and 3, and on Tuesday of  
 2 this week took the decision to escalate to REAP level 4,  
 3 extreme pressure, and that remains the case today."  
 4 Sir, this is due to the extremely high levels of  
 5 activity in the north-west region, the pressure on local  
 6 hospitals, and the trust operating whilst some of its  
 7 workforce is isolating or shielding. In response to  
 8 this rise, NAWAS is maximising its resources by putting  
 9 all clinically trained staff on the responding front  
 10 line, increasing the use of private providers, and  
 11 working with healthcare partners to safely help and  
 12 guide non-urgent cases to all other healthcare services.  
 13 REAP levels can change throughout the day and the  
 14 trust will carefully be monitoring the effects of the  
 15 escalation, which it is hoped will manage the increase  
 16 in demand.  
 17 I'm urged to say this, sir, and I do so: the public  
 18 can help by only calling 999 in serious or  
 19 life-threatening emergencies, checking their symptoms on  
 20 111 online, and acting with the Government COVID  
 21 guidelines by only travelling when necessary, shopping  
 22 only for essential items, and staying at home.  
 23 In summary, the demands of the service in the  
 24 north-west are expected to peak over the next 2 weeks or  
 25 so. The north-west is currently tracking some of the

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1 highest transmission rates in the country, in both  
 2 Cheshire and Merseyside, and this is only likely to  
 3 worsen. Mutual aid has been requested as part of  
 4 national contingency arrangements and consideration is  
 5 being given to requesting other support. The public are  
 6 being encouraged to seek only assistance from the trust  
 7 when it is an absolute emergency.  
 8 All non-essential activities, such as training and  
 9 planned leave, have been cancelled to support the  
 10 increased demands.  
 11 It is very difficult, sir, to predict how far the  
 12 situation will deteriorate and the impact that this will  
 13 have. Whilst the situation is worsening, the public  
 14 should be reassured that the trust is doing all it can  
 15 to continue to meet the demand for services in the  
 16 region.  
 17 Sir, those representing NAWAS for the purposes of  
 18 this inquiry will continue to assist you, sir, the  
 19 inquiry legal team and all core participants in whatever  
 20 way we can, irrespective of the current difficulties  
 21 faced by the NAWAS inquiry witnesses. In short, sir, the  
 22 work of the lawyers can and should continue so that all  
 23 core participants and you, sir, will benefit from  
 24 whatever practical assistance we can continue to give.  
 25 In short, we thank the inquiry legal team for

24

1 accommodating the needs of NAWAS at this particularly  
 2 difficult time and in saying, as they have done, that no  
 3 NAWAS witnesses will be called to give evidence, either  
 4 in person or remotely, until after the February  
 5 half-term.

6 We note also the proposed virtual hearing on  
 7 Tuesday, 16 February and between now and then, we, as  
 8 the lawyers representing NAWAS, and the organisation  
 9 itself will keep under review two key issues. They are  
 10 as follows: the attendance of witnesses from the week  
 11 commencing 22 February onwards in person and the  
 12 feasibility thereof and, secondly, the duration of the  
 13 arrangements as they are currently in place, namely  
 14 remote, as we are at present, and thereafter a much  
 15 limited attendance at the inquiry, which again we  
 16 applaud.

17 Sir, those are our submissions. As I say, largely  
 18 those that we put forward on Monday of this week have  
 19 been accommodated, but we felt it helpful to you, sir,  
 20 and for the inquiry and those who take an interest in  
 21 these proceedings to know what the situation is  
 22 currently.

23 Thank you, sir.

24 SIR JOHN SAUNDERS: Thank you very much, Ms Roberts, for  
 25 that update. Clearly, the life-saving activities of

25

1 members of NAWAS will and must take priority over any  
 2 attendance at the inquiry and that will obviously  
 3 continue to be the position.

4 MS ROBERTS: Thank you very much, sir.

5 SIR JOHN SAUNDERS: Thank you for your submissions.

6 MR GREANEY: Next, Mr Gibbs on behalf of British Transport  
 7 Police.

8 Submissions by MR GIBBS

9 MR GIBBS: Good morning.

10 You've got our submissions at pages 27 and 28 of the  
 11 bundle. Since writing them, I have looked at the  
 12 submissions of others and it is plain that everyone  
 13 would ideally like the same thing but none of us can  
 14 have it: everyone would like a physical hearing we all  
 15 know it is impossible.

16 There are different reasons for wanting physicality,  
 17 some of them are therapeutic, some of them are forensic,  
 18 some of them are simple matters of convenience and  
 19 efficiency. But there is, in our submission, no  
 20 realistic prospect that full physical hearings in any  
 21 judicial forum are going to be restored until after this  
 22 inquiry has been concluded.

23 If the next question then is safety and the  
 24 imperative is that nothing be done which is unsafe, by  
 25 which I mean contrary to the reasonable guidance of

26

1 those who know about these things, then does one get  
 2 logically to the conclusion that what we should do is  
 3 the most physical thing that is safe? That's our  
 4 submission.

5 There's a wide range of views about what that is and  
 6 they are demonstrated throughout the submissions which  
 7 you've had in writing. Unsurprisingly, there are strong  
 8 views in every direction. None of those views, we  
 9 submit, should be silenced, none of them carries a veto.  
 10 Whatever the decision that you make may be, a small  
 11 number of people are bound to be disappointed. That is  
 12 the nature of the beast. It goes without saying that  
 13 it's a difficult decision and it's always easier to put  
 14 off a difficult decision. We ask you not to put it off,  
 15 not least because we already know, and I'm uncertain to  
 16 what extent the document that I am about to refer to is  
 17 to be made public, but I'm just going to call it the  
 18 document that relates to 5 January of this year and  
 19 a meeting that took place that day.

20 I'm on the second page of it and note that it has  
 21 been suggested that the measures currently being put in  
 22 place may be in place until March or April. I don't  
 23 know whether you have that document, sir.

24 SIR JOHN SAUNDERS: I do have it, yes, thank you very much.  
 25 I have it up now. It's the first bullet point.

27

1 MR GIBBS: Yes, that's right. I was going to come back to  
 2 that document very briefly in a second. We invite you  
 3 therefore, in the light of that, to consider today the  
 4 position beyond 22 February, not necessarily with  
 5 finality, everything needs to be kept under review, but  
 6 to consider the position beyond 22 February to some  
 7 extent at least, accommodating as a priority the  
 8 witnesses about whom Ms Roberts has just made  
 9 representations, namely the ambulance professionals.

10 Sir, remote hearings obviously aren't ideal, they're  
 11 far from that, particularly for the tribunal who is  
 12 having to marshal them and to receive and digest the  
 13 evidence. You will note a comment to that effect in our  
 14 written submissions. But it is my submission that some  
 15 of the concerns which were expressed in CTI's note back  
 16 in March of last year about remote hearings have been  
 17 answered by our experience of the participation and the  
 18 very effective participation of a number of significant  
 19 core participants in chapter 7 remotely and that is  
 20 encouraging for all of us and there is much that we can  
 21 all learn from, perhaps not least by asking them how  
 22 they did it from their very effective participation  
 23 through those months of evidence.

24 Your team will have been in contact, I have no  
 25 doubt, with those who are running the inquiries who are

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1 in a similar position to us -- we've identified them in  
2 our written submissions -- all of whom are facing in  
3 effect the same difficulty, all of whom are dealing with  
4 evidence that is controversial and emotional and  
5 distressing and ghastly in every respect, and all of  
6 whom have reached at different times different  
7 conclusions about how they can square the circle of  
8 physicality, impossibility and a fair hearing.

9 You will have noted also the determination that is  
10 being shown around the country in Crown Courts under the  
11 guidance of the Lord Chief Justice in jury trials,  
12 5 days a week, even during the present difficulties,  
13 with all of the childcare problems that they bring.  
14 There's no perfect correlation, plainly, between a jury  
15 trial and the present proceedings, but there is, we  
16 submit, something to be learned from the experience of  
17 the other inquiries and the way in which they have been  
18 able to deal with the present situation.

19 So it comes to this: we submit that it would be  
20 right to proceed as physically as is safe with all of  
21 the evidence in chapter 10, subject to the arrangements  
22 that will need to be made for particular witnesses and  
23 the childcare arrangements of those participating.

24 SIR JOHN SAUNDERS: Thank you, Mr Gibbs. I have tried to  
25 look at what other inquiries are doing. No inquiry's

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1 situation is identical, nor is the type of evidence.  
2 The Undercover Policing Inquiry, for example, is dealing  
3 with evidence -- it has dealt with things that are  
4 50 years ago, I think it's now moving up the timescale  
5 a bit to 40 years ago. So it may be that their  
6 requirement for the physical attendance of witnesses is  
7 rather less than ours is, I know not.

8 So I have taken on board what other inquiries are  
9 doing, but I will also have to bear in mind that I think  
10 we're all in a slightly different situation and will be  
11 having somewhat different evidence to deal with.

12 MR GIBBS: Yes. I don't know whether you have thought in  
13 terms of those other inquiries that the one perhaps  
14 closest to ours in terms of distress and controversy was  
15 probably Grenfell.

16 SIR JOHN SAUNDERS: I think that is right. I note that  
17 Grenfell still have to decide when they are going to  
18 carry on with remote hearings, which they agree are not  
19 the best, but in order to keep going they need to. At  
20 the moment I am not particularly aware of what the  
21 nature of that evidence is going to be and how  
22 technically based it is. But clearly, their experience  
23 is important to us to consider as well.

24 MR GIBBS: I have no other submissions.

25 SIR JOHN SAUNDERS: Thank you very much and thank you for

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1 your help, Mr Gibbs.

2 MR GREANEY: Sir, to answer your point, Grenfell is about to  
3 embark upon what they call module 2, which involves  
4 highly technical evidence, principally relating to the  
5 cladding. So they are dealing with a different type of  
6 evidence from that which we will be dealing with in  
7 chapter 10.

8 Sir, next I'm going to call upon Mr Horwell to make  
9 his submissions on behalf of Greater Manchester Police.

10 SIR JOHN SAUNDERS: Thank you. Mr Horwell.

11 Submissions by MR HORWELL

12 MR HORWELL: Sir, I'm not sure there's much I can usefully  
13 add to the very short email we have already sent. GMP  
14 is as keen as anyone to get back to business as usual as  
15 soon as possible, but only when it is safe and practical  
16 to do so. That is why we support the proposal of your  
17 team. No one should be under any misunderstanding as to  
18 what the review of 15 February will involve. Nothing is  
19 ruled out and nothing is ruled in. You will then be in  
20 a much better position than you are in today to decide  
21 the future of this inquiry and that is why we support  
22 the proposal.

23 SIR JOHN SAUNDERS: I hope you're right, Mr Horwell.

24 MR HORWELL: Well, there will certainly be more information.  
25 Whether it places you in a better position, only time

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1 will tell, but let us hope so.

2 SIR JOHN SAUNDERS: Yes. Thank you.

3 MR HORWELL: Those are our submissions. Thank you.

4 SIR JOHN SAUNDERS: I'm grateful, Mr Horwell. Thank you.

5 MR GREANEY: I am next going to check whether Mr O'Connor on  
6 behalf of SMG has heard anything that is provoking him  
7 into making a submission.

8 MR O'CONNOR: Thank you. No, you will appreciate that the  
9 evidence that is of particular concern to SMG is the  
10 evidence of chapter 7 that has already been heard. We  
11 do have an interest in the chapter 10 evidence and will  
12 be attending, but, sir, as you will understand, that  
13 interest is much more restricted and in those  
14 circumstances we don't propose to make any submissions  
15 to you this morning.

16 SIR JOHN SAUNDERS: Thank you very much, Mr O'Connor.

17 MR GREANEY: I will make the same enquiry of Mr Laidlaw on  
18 behalf of ShowSec.

19 MR LAIDLAW: Sir, our position is similar to SMG and we have  
20 indicated by way of email that ShowSec support ILT's  
21 proposals. We think those strike the appropriate  
22 balance in a situation which is both very challenging  
23 and far from ideal, and I wasn't going to say anything  
24 further either unless I can assist you.

25 SIR JOHN SAUNDERS: I'm very grateful, thank you,

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1 Mr Laidlaw.  
 2 MR GREANEY: In a moment I'm going to turn to invite  
 3 submissions from those who represent the families.  
 4 Before I do so, I'm going to invite Mr Gardham, who is  
 5 a member of the press, to address you if he wishes to do  
 6 so. Before that occurs, could I indicate that the  
 7 current proposal in accordance with the advice that has  
 8 been received from Public Health England and others  
 9 is that court 9 should be made available in which there  
 10 will be a live feed for a member of the press to view  
 11 the proceedings live, as it were. Having made that  
 12 clear, I would invite Mr Gardham, who I know is online,  
 13 to make any submissions that he feels would be helpful.  
 14 SIR JOHN SAUNDERS: Mr Gardham.  
 15 (Pause)  
 16 Submissions by MR GARDHAM  
 17 MR GARDHAM: Just briefly to say that I'm in touch with  
 18 colleagues, but they haven't really had a chance to feed  
 19 in at the moment. Our position is that we understand  
 20 the need to go virtual if that is what is required.  
 21 We've been talking to the press team about how we may be  
 22 able to, if necessary, make submissions as we go along  
 23 if we are on a delayed feed, and I'm sure the families  
 24 are in a similar position if they need to make  
 25 instructions to their counsel.

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1 We do believe that the inquiry has made every effort  
 2 to keep everyone safe so far and that has actually  
 3 worked remarkably well, and if it is possible to have  
 4 greater participation in in-person hearings, we would  
 5 ask to make use of court 9 to accommodate the handful of  
 6 people from the press that might want to appear in  
 7 person, and it is only a small handful at the moment.  
 8 So I'm grateful to Mr Greaney for indicating that is  
 9 possible for one member of the press at the moment and  
 10 perhaps, if the arrangements change later on, that might  
 11 be possible for more than one or similarly for the  
 12 annexe to be used. We've been very stringent in  
 13 following the restrictions in terms of social distancing  
 14 and masks that have been asked at the Magistrates' Court  
 15 and we will of course continue to do that if those  
 16 hearings were to be the mixture of in person and virtual  
 17 hearings that I know the families are keen to pursue.  
 18 So at the moment we understand the reasons for the  
 19 hearings and we'd just ask to be included in any  
 20 variation that might be considered in the future.  
 21 Perhaps if there are any other submissions from  
 22 colleagues, I could come back to you later.  
 23 SIR JOHN SAUNDERS: That would be helpful. Obviously you  
 24 need to keep in touch, as you do, with counsel and  
 25 solicitor to the inquiry, and you must ask for time to

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1 take into account the views of others if that is how it  
 2 is decided and they want you as their spokesman, and  
 3 we'll obviously allow time for that to happen. Clearly,  
 4 as well, which is behind everything, the situation in  
 5 Manchester and how bad the impact of the pandemic is and  
 6 how bad it will be in a couple of weeks' time is going  
 7 to be fairly crucial to how and in what way we can  
 8 continue. That's why there is some difficulty in saying  
 9 definitely now how we would be proceeding as from  
 10 22 February. Obviously, people would prefer to know  
 11 definitely where we're going at the earliest stage, but  
 12 please do make submissions as and when you wish, and  
 13 we'll of course listen to them.  
 14 MR GARDHAM: The other press are aware that I'm speaking on  
 15 their behalf, it's just that they haven't had a chance  
 16 to respond yet. So if there's anything to add, I will  
 17 get back to you.  
 18 SIR JOHN SAUNDERS: Thank you very much, Mr Gardham.  
 19 MR GREANEY: I am going to turn next to Mr Cooper.  
 20 SIR JOHN SAUNDERS: Ms McGahey was on my list. Do I gather  
 21 she's no longer making submissions?  
 22 MR GREANEY: Her team have been in touch to say she doesn't  
 23 wish to make submissions.  
 24 SIR JOHN SAUNDERS: Mr Cooper.  
 25

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1 Submissions by MR COOPER  
 2 MR COOPER: Thank you. Again, sir, you have seen our  
 3 written submissions and you've had an opportunity of  
 4 reading them, therefore I'm not taking you through them,  
 5 as you would expect me not to, word for word.  
 6 Can I say straightaway, having had some very, very  
 7 fruitful conversations with Mr Greaney over the last few  
 8 days, we support the position being taken by your team  
 9 up until the position as far as February is concerned.  
 10 I wasn't aware that we were going to be in any way  
 11 arguing post 22 February. As far as I am concerned,  
 12 these submissions for today are to assist you in  
 13 strategy leading up to 15 February/22 February, and  
 14 I would certainly invite you, sir, to be of the view  
 15 that any arguments in relation to post 15th/post  
 16 22 February should take place later. During the time  
 17 you'll obviously be able to assess where we are as  
 18 a country, let alone where we are as an inquiry, but  
 19 it would also allow us, if there are to be submissions  
 20 as to going forward after that period of time, to  
 21 properly analyse what is going on so that we can make  
 22 informed submissions to you on that occasion --  
 23 SIR JOHN SAUNDERS: Mr Cooper, we won't make any decisions  
 24 on post 22nd until the 16th, but obviously I'll bear in  
 25 mind what people have said so far, and I will certainly

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1 be bearing in mind what is best for the inquiry.  
 2 I think I'll leave what's best for the country to  
 3 others, if that's all right.  
 4 MR COOPER: Of course.  
 5 Nonetheless, these are all matters which will no  
 6 doubt develop over the weeks ahead, but we will have  
 7 substantive submissions on that matter in due course and  
 8 we'll maintain our position until invited to make those  
 9 submissions, although I will touch a little bit on what  
 10 Mr Warnock has submitted in a moment.  
 11 Whilst of course we have indicated in our written  
 12 document and have just indicated a moment ago, we  
 13 support the position being taken by your team. We would  
 14 like to mark on behalf of the families that it is  
 15 obviously not an easy position and not an easy position  
 16 for them. In making the submissions as we do, there are  
 17 nuances of position even amongst those we represent.  
 18 We would like some assurance, if we may ask it of  
 19 you, sir, in due course that all options have already  
 20 been considered other than the position which is being  
 21 advocated by my learned friend Mr Greaney. Clearly  
 22 there are some we advise who have considered whether  
 23 a position of a complete postponement now of proceedings  
 24 may be appropriate. We're assuming by the positions  
 25 being presented by Mr Greaney that that has been

1 considered and has been considered to be not the  
 2 approach to be taken at this stage.  
 3 On the basis that that is the position as far as  
 4 your team is concerned, as I've indicated before, we  
 5 support the suggestions being made and support them  
 6 significantly. But in doing so, we would like to  
 7 emphasise, as we touch upon in our written document,  
 8 this is already, even within those helpful and positive  
 9 positions being propagated by Mr Greaney, a restriction  
 10 and a severe restriction upon the participation of the  
 11 families. These are not 100% virtual hearings and, as  
 12 we have marked, there will be representatives, quite  
 13 understandably, CTI, STI, in particular, who will be in  
 14 person and present in your hearing room, and that is for  
 15 good reason, because the effectiveness of forensic  
 16 examination, the effectiveness of understanding the  
 17 witnesses, the effectiveness of directly asking them  
 18 questions and the effectiveness of full participation by  
 19 advocates and families is better achieved directly.  
 20 It goes without saying that by conducting our  
 21 representation of those we represent virtually, we are  
 22 going to be at some disadvantage, quite what that  
 23 disadvantage will be, taking into account all the  
 24 assistance we're being given by your team, will develop  
 25 in due course. But you have noticed implicitly, if

1 nothing else, that if one can, it is imperative for the  
 2 effective forensic examination of evidence for people to  
 3 be present in the room, in the hearing room, to examine,  
 4 which is why CTI will be there. Those we represent are,  
 5 and I put it bluntly, deprived of that advantage and  
 6 deprived of that opportunity under the present  
 7 conditions. And in our submission, though supporting  
 8 and understanding the difficulties we are all in,  
 9 we have to mark that point as we do in writing as we do  
 10 now orally.  
 11 As you will have noticed, sir, and others during the  
 12 course of these proceedings, the team that I represent  
 13 have been in attendance every day of the proceedings  
 14 from September to December, and I speak for myself,  
 15 I have been in attendance in the hearing room all but  
 16 save 3 days. I can inform this inquiry that those  
 17 I represent have found that invaluable. Invaluable both  
 18 in terms of our full participation, invaluable in terms  
 19 of being able to directly take instructions from our lay  
 20 clients when appropriate, and at times, in difficult  
 21 moments which have required direct attendance with them  
 22 at difficult and sensitive moments, but also it has  
 23 enabled me to directly speak with Mr Greaney and others  
 24 of his team immediately, directly, as and when is  
 25 appropriate and needed to deal with issues to achieve

1 the smooth running of your inquiry.  
 2 I'm sure, sir, you are aware behind the scenes --  
 3 and I mean that in no way secretly, I mean that  
 4 productively -- there have been a number of  
 5 conversations and discussions between all teams,  
 6 particularly between our team directly, because we've  
 7 been there at the scene, at the hearing, which has  
 8 enabled your process to run smoothly and at times to  
 9 iron out difficulties which may well have been of more  
 10 difficulty had we not been there to deal with them  
 11 directly with Mr Greaney and his team.  
 12 So we are in a particularly strong position, we  
 13 submit, when we make these submissions to you to commend  
 14 the effectiveness of being direct in the hearing room,  
 15 both through counsel and through those instructing me,  
 16 direct for the efficiency of the forensic process,  
 17 direct for the importance of direct participation with  
 18 the families, and direct in the hearing to assist your  
 19 team when issues need to be ironed out, explained or  
 20 nuanced.  
 21 So it is right to mark, we submit, whilst obviously  
 22 commending our written submissions to you, that the  
 23 process which even now is being suggested, which even  
 24 now we support in the circumstances, puts the families,  
 25 certainly those that we represent, in an inferior

1 position to what they were in in September to December.  
 2 And given that that is the case and the reason I'm  
 3 submitting in these terms is that that position should  
 4 be for limited duration so far as you and your team can  
 5 assist us.  
 6 I understand that it's a difficult time at the  
 7 moment and one cannot predict what is going on, but  
 8 it is wrong in our submission for there to be any  
 9 submissions at the moment which commend themselves to  
 10 you in any way whatsoever, which is anything other than  
 11 this is of limited duration.  
 12 I listened with interest, and our submissions  
 13 of course are based on what we've heard today -- I have  
 14 indicated again I'm not going to repeat my written  
 15 submissions -- but I listened with interest to  
 16 Mr Warnock's submissions about why, for instance, the  
 17 matter should go completely virtual, which is certainly  
 18 something that those we represent substantially oppose.  
 19 He, for instance, submits to you that there is  
 20 an issue of witnesses having to be recalled. Well,  
 21 that is unfortunate. But certainly when one compares  
 22 the important forensic analysis and the cathartic  
 23 process that the families require of this inquiry, that  
 24 we would submit is a secondary consideration. In our  
 25 submission, the families have behaved so far and will

1 continue to do so with understanding, integrity and  
 2 dignity, but this is their only opportunity and will be  
 3 their only opportunity to fully participate in  
 4 a forensic analysis to get to the truth and establish  
 5 where possible accountability.  
 6 So for instance, as Mr Warnock submits, witnesses  
 7 will have to be recalled, we put it bluntly to you, sir,  
 8 then so be it.  
 9 The practical issues of witnesses, as Mr Warnock put  
 10 it, not based in Manchester. Those issues can be  
 11 overcome. These are professional witnesses and in our  
 12 submission of course they are under stress, as  
 13 Mr Warnock again submitted, because they do not have  
 14 finality in giving their evidence. We understand that  
 15 stress. But they should also understand the stress the  
 16 families have of them requiring finality and the  
 17 opportunity to see crucial witnesses directly in  
 18 a hearing room and directly being examined not only by  
 19 CTI but also, where appropriate, by the families'  
 20 instructed teams.  
 21 Sir, you have had advice and we've seen, as Mr Gibbs  
 22 refers to it, the 5 January document. We do invite you,  
 23 sir, to make available to us the full reports you've had  
 24 from all organs that advise on what the risk is and how  
 25 this inquiry should conduct itself so far as the risk

1 goes.  
 2 We do though pray in aid --  
 3 SIR JOHN SAUNDERS: That is being done, Mr Cooper. It's  
 4 certainly our intention that you should be fully aware  
 5 of any information we have on this.  
 6 MR COOPER: I'm grateful, sir. That's reassuring and I'll  
 7 move swiftly on.  
 8 But the analogy, for instance, of Crown Courts is  
 9 interesting when one looks at the 5 January document and  
 10 what it suggests. You will know, sir, no doubt, the  
 11 processes being undertaken not only within the  
 12 Crown Court but within the Court of Appeal and, for  
 13 instance, they're a little more liberal, if I may say  
 14 so, than that proposed in the 5 January document and  
 15 that being adopted potentially and being put to you  
 16 potentially for you to adopt by your team.  
 17 The total amount of people allowed in your hearing  
 18 room is numbered approximately six. I can indicate to  
 19 you, sir, and it may well be anecdotal, from spending  
 20 3 days in the Court of Appeal most recently in December,  
 21 the number of that was virtually doubled and considered  
 22 safe to proceed with a full hearing with witnesses  
 23 in the Court of Appeal.  
 24 Again, when one considers the position in the  
 25 Crown Courts, Crown Courts are sitting -- and I am

1 interested again in Mr Warnock's observation that jury  
 2 trials are becoming more and more virtual and remote.  
 3 Well, we don't agree with that. What we do submit is  
 4 that jury trials up and down the country are still  
 5 continuing, 5 days a week, sometimes with a full bench  
 6 of advocates present, with solicitors, with witnesses  
 7 and with ushers, and the Lord Chief Justice certainly,  
 8 I'm sure, receives advice, proper scientific advice, and  
 9 no doubt if it was advice which undertook that that was  
 10 to be a risk or in any way dangerous, the Lord  
 11 Chief Justice would not be encouraging advocates to go  
 12 into court and risk themselves. On that basis, sir,  
 13 many, many more people are being allowed by the Lord  
 14 Chief Justice into Crown Courts.  
 15 The Court of Appeal analogy I used of -- simply at  
 16 the end of term last year, just before Christmas, 10 to  
 17 12 people being allowed for a three-day hearing in the  
 18 Court of Appeal. We submit, sir, again, and it's one of  
 19 the reasons we wanted to understand the written advice  
 20 you were being given, that the written advice you're  
 21 being given seems somewhat stricter -- and there may be  
 22 a reason for that -- that what is being operated both in  
 23 the Court of Appeal and indeed in the Crown Court.  
 24 Some members of the bar, sir, as you will know, are  
 25 literally being summoned by Crown Court judges, not

1 quite of course, to court and being told to attend at  
 2 court. And indeed, some are sending down in cells with  
 3 clients. All of this, the way things are operated in  
 4 those jurisdictions, seem to indicate, and one assumes  
 5 that people are not being put at risk in those regimes,  
 6 a different form of advice that is being given by the  
 7 Lord Chief Justice and a different form of advice is  
 8 being given to Crown Courts and a different form of  
 9 advice given to the Court of Appeal.

10 So on behalf of the families, whilst again we  
 11 emphasise we support the position being taken at this  
 12 moment and are cooperative with it, we are still to some  
 13 degree questioning about it for the reasons that we've  
 14 expressed and would ask, if it is possible, if we can  
 15 have some reassurance as to why there seems to be that  
 16 disjointed attitude between Crown Courts, the Court of  
 17 Appeal and indeed the advice that you seem to be being  
 18 given. That said, that's the advice you're being given.

19 Moving on very swiftly, if I may, to submissions we  
 20 made within our written document that I haven't précised  
 21 at this moment. We emphasise within our document the  
 22 importance of family support, for instance also the  
 23 provision of laptops where families may be short of  
 24 laptops to enable them to fully participate with the  
 25 proceedings. I know that is being undertaken as we

1 speak, virtually.

2 We also expect and hope that the system works  
 3 a little better than it has today, certainly on YouTube,  
 4 where there is no delay, and we submit if these hearings  
 5 are going to be virtual then they should be real time  
 6 virtual and there should be full opportunity for the  
 7 families to fully participate as well as a result of  
 8 that facility.

9 Sir, therefore, in our submission, we agree with the  
 10 proposal being put. We strongly make our position clear  
 11 that it's on the basis that it has, to use the political  
 12 expression, a sunset clause as far as that is concerned,  
 13 to enable us if necessary to have full argument in the  
 14 middle of February on the matter, fully informed  
 15 argument based on any advice you're being given with the  
 16 ability to challenge it should that be appropriate.  
 17 Because in our submission, the important thing, as far  
 18 as this inquiry is concerned, as far as the families we  
 19 represent, is that momentum should be maintained. It is  
 20 important that that momentum is maintained so that the  
 21 families have the opportunity of hearing this evidence  
 22 directly, being in the hearing room when they want to  
 23 be.

24 I conclude in this way: from those we represent, as  
 25 you'd expect, sir, we have taken detailed instructions

1 from them. A number of families hitherto that you have  
 2 not seen within the hearing room have made it very clear  
 3 to me during conference when their loved ones' names are  
 4 being particularly dealt with, when their significant  
 5 moments are being dealt with, as they will be later on  
 6 in this inquiry, they will wish, subject to being  
 7 allowed, to be in the hearing room. So, sir, although  
 8 it may well be a number of families you've not yet had  
 9 the pleasure of seeing in your hearing room as yet,  
 10 they've indicated to me in conference that when certain  
 11 evidence is heard, they would wish to be there. As one  
 12 put it to me -- and I'll conclude this way -- for them  
 13 it's not a wish, it's a need.

14 Unless I can assist you any further, those are our  
 15 submissions.

16 SIR JOHN SAUNDERS: Well, Mr Cooper, let me discuss through  
 17 some of the options with you, if you don't mind, and use  
 18 you as a sounding board.

19 I'm well aware that it is, as you've described,  
 20 a need for some of the families to be within the hearing  
 21 room itself and be able to see the evidence being given.  
 22 I well understand that and I'm going to be hearing  
 23 similar submissions from Mr Atkinson on behalf of some  
 24 of his clients as well.

25 Also, there is a general view, I think, that we need

1 to maintain whatever momentum we can. I assure you that  
 2 we will ask, before any risk assessment which is  
 3 prepared for the hearing on 16 February, that  
 4 consideration, careful consideration, is given to the  
 5 feasibility of family members being able to attend. It  
 6 may be that other courts get different advice, I simply  
 7 have no idea, or whether they have different  
 8 considerations. For example, I did see a letter going  
 9 out from the Court of Appeal, indicating that the Court  
 10 of Appeal, because of the way it's designed, is  
 11 particularly good for people, having a number of people  
 12 being there. But clearly, as you will be aware, I have  
 13 to listen with particular care to the risk assessment  
 14 prepared for our hearings.

15 So on 16 February, depending on the situation, we  
 16 may be in a position where a number of family members  
 17 can be present and it may be possible to accommodate  
 18 those who have the need to attend. Equally, there are  
 19 those who have always been perfectly happy and find it  
 20 easier, and I well understand the different views, to  
 21 actually listen remotely.

22 If that is not possible and there are a considerable  
 23 number of family objections to witnesses being called  
 24 without them being present, we will obviously consider  
 25 not having them be called so that the families can

1 properly participate. But in that case, consideration  
 2 needs to be given, if we get in a position where we  
 3 realistically can't proceed in any other way but  
 4 remotely, to think through all those witnesses that are  
 5 in the inquiry, forget about chapters, who it may be can  
 6 give their evidence remotely.  
 7 For example, I have read the evidence of  
 8 Dr Wilkinson with some care and it might be that his  
 9 evidence could be given remotely perfectly  
 10 satisfactorily for everybody. That's just an example,  
 11 but if we are going to have to consider the alternative,  
 12 going completely remote as from 15 February, which, who  
 13 knows, depends on what the situation is with the virus  
 14 at that time, I would like people to be applying their  
 15 minds -- because we all agree that momentum should be  
 16 maintained if possible -- to start considering who  
 17 we can actually deal with remotely who the families  
 18 will not feel that they're not participating because  
 19 they're not there.  
 20 Obviously, communication between lawyers and  
 21 families of course is much better having you all there  
 22 on the spot, much, much, much better, I well understand  
 23 that. But it is possible to do that without people  
 24 being present, provided time is allowed. I just want  
 25 everyone to think of all the possible options so we're

1 in the best position on 16 February to make progress  
 2 if we possibly can.  
 3 MR COOPER: Sir, that's very helpful indeed, and of course  
 4 I for one, and I'm certain my colleagues will be the  
 5 same, see the merit in what you have said, and in  
 6 advance of 16 February no doubt characteristically  
 7 myself and others can speak with Mr Greaney and his  
 8 team.  
 9 As you'll have already seen, sir, when it comes to  
 10 chapter 10 witnesses, there's a great deal of  
 11 cooperation happening already as to the way witnesses  
 12 are being presented. That can certainly be done and I'm  
 13 confident it will be done.  
 14 SIR JOHN SAUNDERS: Okay, thank you very much, Mr Cooper.  
 15 MR GREANEY: May I reassure Mr Cooper about two things?  
 16 First of all, the document that both he and Mr Gibbs  
 17 referred to with considerable care, which notes  
 18 a meeting that took place last Tuesday, represents the  
 19 full extent of the advice that we have received.  
 20 Bearing in mind the pressure that the organisations that  
 21 attended that meeting are currently under, we have not  
 22 felt it was appropriate to press for anything more  
 23 detailed or more formal in writing. I'm sure Mr Cooper  
 24 will understand why that's so.  
 25 Secondly, so far as laptops and technology are

1 concerned, Mr Suter circulated an email yesterday  
 2 afternoon, I believe, and the relevant part of that  
 3 reads as follows:  
 4 "We have already liaised with some families who do  
 5 not have regular access to a computer and if other  
 6 families are in a similar position, please let the  
 7 inquiry legal team know and we will make enquiries to  
 8 obtain laptops. That can be made available during the  
 9 proposed remote hearings. This can take a little time  
 10 and we would encourage family core participants to let  
 11 us know about any requests as soon as possible."  
 12 So in short, sir, we will do whatever we can to  
 13 help.  
 14 Having made those remarks, I will next invite  
 15 Mr Atkinson to make submissions on behalf of the  
 16 families he represents.  
 17 SIR JOHN SAUNDERS: Thank you. Mr Atkinson.  
 18 (Pause)  
 19 SIR JOHN SAUNDERS: I'm afraid we're not hearing you at the  
 20 moment.  
 21 MR GREANEY: Sir, what I'm going to do is, so we don't lose  
 22 time, is ask Mr Weatherby to make the submissions that  
 23 he has to make and in the meantime we will be in touch  
 24 with Mr Atkinson and see what we can do to help.  
 25 SIR JOHN SAUNDERS: Sorry about that, Mr Atkinson. We will

1 hear you before we finish.  
 2 Submissions by MR WEATHERBY  
 3 MR WEATHERBY: Can you hear me, sir?  
 4 SIR JOHN SAUNDERS: We can, yes. Thank you, Mr Weatherby.  
 5 MR WEATHERBY: Excellent. I'll be very short, in fact.  
 6 As is obvious from the other submissions, we are in  
 7 the middle of a national emergency. There were more  
 8 than 1,500 reported deaths yesterday, the highest number  
 9 so far. We know that there had been more than 100,000  
 10 deaths where COVID has been a factor in this country so  
 11 far. We are in the midst of it, regrettably it's  
 12 getting worse at the moment, not better.  
 13 Safety has to be paramount, it has to be at the  
 14 forefront of everybody's minds, I think we're all on the  
 15 same page with that.  
 16 The proposals that have been put forward are  
 17 a compromise. They are not perfect, they are not ideal,  
 18 but, doing our best, we cannot better them, and we  
 19 therefore completely support the proposals that have  
 20 been put forward by your team.  
 21 May I just say in terms of remote attendance, as you  
 22 know, and as I think everybody knows, I personally have  
 23 been attending remotely since September because I am  
 24 shielding a close family member, which makes it almost  
 25 impossible for me to attend, and you have facilitated

1 that and I'm grateful for that.  
 2 May I say, just to reassure anybody else, that in  
 3 fact I have not found that to be an insurmountable  
 4 obstacle or a particular disadvantage. I have been very  
 5 careful to seek feedback regularly from those  
 6 I represent and they have not found it a disadvantage  
 7 either and of course I have met virtually regularly with  
 8 all of my families.  
 9 May I also reassure others that in terms of  
 10 communications, I have been able to be in immediate  
 11 communication with your team by a variety of means --  
 12 email, text, telephone -- and they have been very  
 13 careful to assist me in remote access. So I hope that  
 14 brings some reassurance to others.  
 15 SIR JOHN SAUNDERS: Mr Weatherby, I'm very grateful to all  
 16 counsel and to counsel to the inquiry for the amount of  
 17 time they have spent communicating behind the scenes.  
 18 I know it has meant that a lot of matters can be sorted  
 19 out between you without me having to rule, which is  
 20 obviously a much better way of doing, it if at all  
 21 possible, and it makes my life enormously much easier  
 22 that people are cooperating in the way they are, so  
 23 thank you.  
 24 MR WEATHERBY: The practical issues of that were something  
 25 which were at the forefront of my mind when I started

1 appearing remotely, but in fact we have managed them  
 2 collectively and particularly with the efforts of your  
 3 team, so I hope that provides some reassurance  
 4 elsewhere.  
 5 I am not unsympathetic to the submissions carefully  
 6 made by Mr Warnock and I agree with the submissions by  
 7 Mr Horwell in terms of nothing being on or off the table  
 8 in February. It seems to me, with respect, that we need  
 9 to get to February first and keep the momentum going,  
 10 such as it is, and then completely see what the picture  
 11 is. We may be able to carry on more normally or  
 12 regrettably we may have to think again in another way.  
 13 I said finally but I do have one further point. Can  
 14 I just mark the fact that we are, on the current  
 15 proposals, going to sit for less days. We particularly  
 16 want to note the importance of that because of  
 17 childcare. Certain other jurisdictions have been less  
 18 concerned with that, regrettably, and we are grateful  
 19 both on behalf of some of the families who have  
 20 childcare commitments and also in terms of some of the  
 21 lawyers, and no doubt court staff and others who have  
 22 greater childcare commitments. So we commend, although  
 23 it's regrettable that we slow down by having less days,  
 24 but we do think that's an essential part of the  
 25 proposals.

1 I don't think I can assist further.  
 2 SIR JOHN SAUNDERS: Thank you for that as well,  
 3 Mr Weatherby.  
 4 We are going to sit less days, that will slow things  
 5 down, but my present experience is there has been plenty  
 6 to do in the meantime and certainly the preparation for  
 7 the report on chapter 7 is something that will take  
 8 a considerable amount of time and having extra time  
 9 in the week will certainly assist with that.  
 10 MR WEATHERBY: Indeed.  
 11 SIR JOHN SAUNDERS: So thank you for that. Right,  
 12 Mr Atkinson, time to try again.  
 13 MR ATKINSON: Can you hear me now, sir?  
 14 SIR JOHN SAUNDERS: Absolutely, and it looks very elegant,  
 15 your headset, too.  
 16 Submissions by MR ATKINSON  
 17 MR ATKINSON: Can I apologise for the fact that I look like  
 18 I work in a well-upholstered call centre and I hope to  
 19 have remedied this by the time we next speak, sir.  
 20 I was able to hear Mr Cooper's submissions and  
 21 I adopt everything that he said. We, like others,  
 22 welcome all that your inquiry team have been doing, the  
 23 very hard, work, the very great care they have shown in  
 24 producing the proposals that they now advance.  
 25 They recognise, as I know you do, sir, that it is

1 very far from what the families would wish. You have  
 2 throughout been clear that you wanted the families to be  
 3 at the heart of this process and that does mean them  
 4 being in the room with you when evidence is heard. It  
 5 was for that reason that this inquiry did not start in  
 6 June of last year in the main. We entirely agree that  
 7 it is far too early to make a decision now about the  
 8 whole of chapter 10 or more broadly the inquiry going  
 9 forward.  
 10 The situation in Manchester, the situation in terms  
 11 of Public Health England recommendations, has been  
 12 evolving at a rapid rate and it will continue to do so.  
 13 You, sir, will get assistance from the experience of the  
 14 jury system between now and then as to what has been  
 15 identified to be safe or not for larger numbers of core  
 16 participants in those proceedings to be in the same  
 17 space and that, we hope, will help Public Health England  
 18 in advising you in a few weeks' time.  
 19 The families I represent are unanimous in their  
 20 desire that the inquiry should make progress. They want  
 21 the answers to the questions that they have waited far  
 22 too long for already. They also want you, sir, to be in  
 23 a position to make recommendations as soon as you can  
 24 that will prevent anything like this happening to other  
 25 families in the future. It is with that in mind that we

1 would ask not at this stage but when we reach our review  
2 in the middle of September (sic) that we do look at  
3 whether childcare commitments do need us to have  
4 a shorter week than we normally have going forward  
5 because we want to make progress where we can.

6 But as you and your inquiry team well recognise,  
7 there are significant parts of the evidence -- and  
8 chapter 10 is a key example of this -- where the  
9 families would wish to be there to honour their loved  
10 ones who died by being present when witnesses are called  
11 who had dealings with them, who were in the City Room,  
12 and to hear evidence from those witnesses from whom they  
13 particularly want answers as to how things were allowed  
14 to occur as they did after the event as much as before.

15 Equally, sir, a lot of that evidence will be both  
16 difficult and emotive evidence, for which the families  
17 will need support. It is very far from satisfactory  
18 that they should be in a position where they may have to  
19 hear evidence about their loved ones from home on their  
20 own without the support either of those who represent  
21 them or from the Resilience Hub, who have been extremely  
22 helpful for many of those, both in the hearing room  
23 itself and of course, importantly, at Spinningfields,  
24 where there have been a large number of families able to  
25 hear, to support each other and to have the assistance

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1 of the Resilience Hub in helping them through that  
2 process. None of that will be available to them at home  
3 and it is important that it should be.

4 It is not least for that reason that we certainly  
5 submit, sir, that you should be very hesitant in  
6 agreeing with some of the submissions that have preceded  
7 this that you should make decisions now about anything  
8 more than the immediate few weeks ahead.

9 All that said, and whilst we could quibble with some  
10 of the witnesses at the moment chosen by your inquiry  
11 team for those early weeks of February as to whether  
12 they are either uncontroversial or whether putting them  
13 so far forward in chapter 10 is actually  
14 counterproductive to their evidence being of use to you,  
15 we broadly support what is proposed but with the great  
16 caveat that it must be kept under very close review so  
17 that the families do properly and really remain at the  
18 centre of these proceedings as you have always promised  
19 that they should.

20 SIR JOHN SAUNDERS: Okay. Thank you very much, Mr Atkinson.

21 There are going to be difficult decisions in the  
22 future. It's almost inevitable that this is going to  
23 slow down the progress of the inquiry to some extent.  
24 But we'll obviously try and make it the minimal amount  
25 while allowing for full participation by those who need

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1 it. I invite you, as with others, to have in mind what  
2 steps can be taken if we are being told by Public Health  
3 England it is just not safe to have families present  
4 in the room midway through February. Anyway, I'm sure  
5 people will.

6 Thank you very much for that. It was good to hear  
7 from you eventually.

8 Further submissions by MR COOPER

9 MR COOPER: Sir, may I add one matter which I should have  
10 added in terms of witnesses in chapter 10? I was rather  
11 leaving that to the end. I have spoken to Mr Greaney  
12 again about his witnesses proposals for chapter 10 in  
13 the first tranche of activity coming up. I have  
14 indicated to him there are two witnesses which we need  
15 to discuss. That's the witnesses Mick Lawlor and  
16 John Fletcher. These are fire witnesses and, as you may  
17 recall, sir, I'm designated by family CPs to lead on the  
18 fire issue.

19 I have indicated already to Mr Greaney what the  
20 matter is between me and him on those two witnesses. In  
21 short, we submit that any consideration of evidence  
22 relating to the Winchester Accord should be, so far as  
23 we can, when we are out of the virtual restrictions,  
24 when the families can be present and when of course  
25 their advocates can be present. I won't go into detail,

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1 any further detail than that, but we are in ongoing  
2 discussions on that and it may be Mr Greaney and I can  
3 be left to carry on those discussions without troubling  
4 you at this stage, sir.

5 SIR JOHN SAUNDERS: By all means, but thank you for making  
6 that clear.

7 Mr Greaney, is that all the submissions?

8 MR GREANEY: No, we have still left Mr Gozem on behalf of  
9 his families and I know that the media do wish to make  
10 some additional submissions. I'm probably getting to  
11 this rather later than I ought to have done, but may  
12 I check with Mr Seddon whether he is content to carry on  
13 for what I expect will be no more another 15 or  
14 20 minutes or whether he needs a break at this stage.  
15 If he does, he must not be shy about saying so.

16 (Pause)

17 SIR JOHN SAUNDERS: Thank you very much, Mr Seddon, for your  
18 cooperation.

19 Mr Gozem.

20 Submissions by MR GOZEM

21 MR GOZEM: Not at all, sir. I can be very short, I think.

22 Our families support the proposals for  
23 a continuation until 15 February and, in particular,  
24 would like to thank you, your legal team, counsel to the  
25 inquiry, the court staff and the technicians, all of

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1 whom are working hard and no doubt making sacrifices to  
 2 make that possible. You have our submissions and there  
 3 is nothing that I wish to add.  
 4 SIR JOHN SAUNDERS: Thank you, Mr Gozem. I hope sacrifices  
 5 will not be necessary, but thank you very much.  
 6 MR GREANEY: Finally, sir, subject to some short remarks  
 7 that we would wish to make, I would invite Mr Gardham to  
 8 address you again, please.  
 9 SIR JOHN SAUNDERS: Mr Gardham, I can now see you. We seem  
 10 to have lost you again vocally.  
 11 (Pause)  
 12 MR GREANEY: If all else fails, no doubt Mr Gardham could  
 13 set out any further views he wishes to express on behalf  
 14 of the media in an email to Mr Suter, but let's hope the  
 15 technology can resolve this.  
 16 SIR JOHN SAUNDERS: Mr Greaney, while we're discussing the  
 17 technology, things have always worked pretty well on  
 18 these remote hearings. They've been less successful  
 19 today. I'm not quite sure what the problems have been,  
 20 but obviously it will be helpful if we can resolve these  
 21 problems before we have another virtual hearing next  
 22 week -- not next week, the week after. It would  
 23 certainly help if things could be sorted by then.  
 24 MR GREANEY: We'll look into what went well and what didn't  
 25 go well and learn from that experience.

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1 SIR JOHN SAUNDERS: Mr Gardham, would you like to try again?  
 2 MR GARDHAM: Can you hear me now?  
 3 SIR JOHN SAUNDERS: We can, thank you very much.  
 4 Further submissions by MR GARDHAM  
 5 MR GARDHAM: My apologies, first of all, for making two  
 6 interventions. This obviously isn't really about us at  
 7 all but about the core participants, particularly the  
 8 families involved, but I have received a couple of  
 9 points from my colleagues who are watching and that's  
 10 mainly from the BBC, who wanted to make some points  
 11 about the BlueJeans link, which other participants have  
 12 access to and we have access to today. They're making  
 13 the point that although we should be able to have one  
 14 member of the press in court 9 to cover the hearings, it  
 15 will, if we are on a delay on YouTube, make it very  
 16 difficult if we need to make submissions to do so in  
 17 real time and cause real problems for the inquiry itself  
 18 and also for those of us that are trying to keep up with  
 19 it. I think the request really from the small number of  
 20 people that have been attending in person would be that  
 21 whether there is a possibility of having one or two of  
 22 them join the BlueJeans link so that they can make  
 23 representations in real time if necessary, that would be  
 24 extremely helpful and would be something that might  
 25 become actually very important if these proceedings

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1 continue in this way beyond the middle of February.  
 2 Let me just check, because I'm getting emails as we  
 3 speak, that that is essentially the points that they  
 4 were wanting to make.  
 5 I think that is their main concern, really, that  
 6 they are put at a disadvantage by being not in court and  
 7 only able to follow on a YouTube link without being able  
 8 to speak to anyone.  
 9 Just to support as well the submissions by Mr Cooper  
 10 and Mr Atkinson, I think there's a few of us -- and  
 11 again messages are coming through -- who have been  
 12 attending courts elsewhere in the country and can  
 13 reassure the tribunal that those have been running  
 14 relatively smoothly since January and it is really  
 15 since January that these extra restrictions have come  
 16 in. Jury trials have been continuing with extra levels  
 17 of perspex divisions and much stricter social  
 18 distancing. I have to say that there's two things the  
 19 inquiry have done better than courts in general and  
 20 that is their social distancing, the measures they've  
 21 had in place, and also the remote arrangements have been  
 22 much better than generally in other courts.  
 23 But those hearings have continued -- particularly at  
 24 the Old Bailey and I think Manchester Crown Court as  
 25 well -- smoothly and without any interruption from

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1 infections from COVID. So I can reassure people that if  
 2 we were to continue, I think that -- well, I hope that  
 3 that could be done relatively smoothly. Thank you for  
 4 listening to me for a second time.  
 5 SIR JOHN SAUNDERS: Mr Gardham, first of all, on the face of  
 6 it, the request about BlueJeans seems perfectly  
 7 reasonable, but it's maybe a matter for those who want  
 8 it. Can you just communicate the names of the people  
 9 who are asking for it so Mr Suter has some idea of how  
 10 many people we're talking about?  
 11 Secondly, I will certainly ensure what is said  
 12 generally today about how Crown Courts are operating,  
 13 apparently perfectly safely with a great deal more  
 14 people than we are permitted, that that is passed on to  
 15 those who are carrying out our risk assessment and see  
 16 what they have to say.  
 17 Thank you for your submissions.  
 18 MR GARDHAM: I'm grateful, thank you.  
 19 SIR JOHN SAUNDERS: Thank you.  
 20 Reply submissions by MR GREANEY  
 21 MR GREANEY: We will look into the BlueJeans issue that's  
 22 been raised by Mr Gardham, but it may be that an  
 23 alternative solution is that we take regular breaks so  
 24 the YouTube feed can catch up. But one way or another,  
 25 we'll hope to identify an appropriate solution.

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1 Secondly, sir, in relation to some of the  
 2 difficulties some of the participants have had today,  
 3 Mr Dunlay has suggested that a way of curing that, or  
 4 hopefully curing it, is by all participants taking part  
 5 in a test call at some stage during the day before the  
 6 hearing.  
 7 Finally, subject to any questions that you have for  
 8 CTI, there was only one thing that we wished to say by  
 9 way of reply, although I think you have rather accepted  
 10 this in any event, that the decision for today is  
 11 a decision about what we do up to the middle of February  
 12 and no more than that. There is no doubt that in the  
 13 middle of February, we will have to make further  
 14 decisions, which we anticipate will be difficult  
 15 decisions, but as Mr Weatherby has put it, nothing  
 16 should be on or off the table at that stage. That's all  
 17 we wish to say, thank you.  
 18 SIR JOHN SAUNDERS: Thank you, Mr Greaney.  
 19 I will issue a very short, call it a judgment, about  
 20 what I have heard today and how I intend to proceed.  
 21 We will be proceeding as proposed next week. So the  
 22 next 2 weeks will be as we have set down and I will try  
 23 and give some indications of the way I want people to  
 24 think and be having in mind before we have a further  
 25 discussion about it on 16 February.

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1 Thank you very much.  
 2 MR GREANEY: Thank you, sir.  
 3 (12.24 pm)  
 4 (The hearing adjourned until Monday, 18 January 2021)  
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