

OPUS2

Manchester Arena Inquiry

Day 64

February 16, 2021

Opus 2 - Official Court Reporters

Phone: +44 (0)20 3008 5900

Email: transcripts@opus2.com

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

1 Tuesday, 16 February 2021
 2 (11.00 am)
 3 SIR JOHN SAUNDERS: Mr Greaney, good morning. I hope
 4 everyone is now able to hear and is attending. I think
 5 it's 11 o'clock so time to go.
 6 Submissions by MR GREANEY
 7 MR GREANEY: Good morning, sir. As everyone knows, today's
 8 hearing will be in two distinct parts. First we will
 9 deal with the inquiry's hearing arrangements in light of
 10 the developments in the ongoing health crisis, and
 11 second we'll deal with the disclosure of two redacted
 12 expert reports on Abdalraouf Abdallah, a person the
 13 inquiry wishes to call to give evidence in chapter 13 of
 14 its oral evidence hearings.
 15 We'll deal with the first of those issues in the
 16 period between now and no later than 1 pm, and then the
 17 second at 2 pm. So first then, the hearing
 18 arrangements.
 19 On 4 January of this year, the Prime Minister
 20 announced the third national lockdown. The following
 21 day, the inquiry legal team circulated a note addressing
 22 the impact of that lockdown on the oral evidence
 23 hearings that were due to commence, at that stage with
 24 chapter 9, on 11 January.
 25 In the result, amid general agreement, you, sir,

1

1 ruled that we would recommence the hearings on
 2 18 January, sitting two and a half days a week with you,
 3 certain members of your legal team and the witness
 4 within the hearing room and all others attending
 5 remotely.
 6 You further ruled that during that period we would
 7 save for the week of 25 January when we heard closing
 8 statements in relation to chapter 7, heard an opening
 9 statement of the issues in chapter 10 by counsel to the
 10 inquiry, along with other evidence in that chapter which
 11 was not substantially controversial, as we put it. And
 12 you directed that there should be a review of those
 13 arrangements at a hearing on 16 February, that of course
 14 is today's hearing.
 15 On 8 February, in order to assist all core
 16 participants to prepare for this hearing, the inquiry
 17 legal team circulated a note. In that note we
 18 identified that, from a technical point, the hearings
 19 had, in our view, run well. However, at paragraph 17
 20 and 18 of our note, we recognise the prospect that
 21 welfare issues may well have arisen for families and
 22 others as a result of remote attendance. Those issues
 23 including but not being limited to the following.
 24 (1). The removal of psychological barriers that
 25 would otherwise be present while hearing evidence in

2

1 a formal setting and instead hearing the evidence at
 2 home, particularly when other family members may be
 3 present.
 4 (2). Diminished access to support networks,
 5 counselling services and legal advice. And in our note
 6 we recognise that these matters were plainly capable of
 7 making it harder to manage hearing and understanding the
 8 evidence and providing instructions upon it.
 9 (3). An increased difficulty in what might be
 10 described as stepping away from the evidence. We
 11 recognise in the note that at home there was no or was
 12 unlikely to be any equivalent to walking out of our
 13 hearing room to the seating room outside for a break
 14 from the evidence and discussing the evidence with
 15 others present.
 16 Sir, those are issues upon which powerful
 17 submissions were made in response to our note of
 18 8 February by certain family teams and we'll turn to
 19 those submissions shortly.
 20 At paragraph 22 of our note, we set out the advice
 21 that had been received by members of the inquiry
 22 secretariat at a meeting with Public Health England and
 23 responsible officers from the local authority on
 24 3 February. It is not necessary, in our view, to set
 25 out the full effect of that advice, but the key elements

3

1 were and I am not going to refer to sub-paragraphs (f)
 2 to (j) of paragraph 22:
 3 "The attendance of more people at the Magistrates'
 4 Court must [it was advised] be assessed very carefully
 5 to ensure for each person it is an essential
 6 requirement. Travel must be done safely and not in
 7 significant numbers.
 8 "If exceptionally more people are permitted to
 9 attend the Magistrates' Court this should not exceed
 10 more than nine people or four family households. Family
 11 members permitted to attend should not all sit in the
 12 main courtroom but should use one of the overflow rooms
 13 as well. Spinningfields should not be reopened as the
 14 maximum number of families who should be permitted to
 15 travel can be accommodated in the main court complex
 16 without needing to re-open Spinningfields and require
 17 the staff there to travel to work.
 18 "The inquiry [we were further advised] should
 19 introduce what is known as double testing with immediate
 20 effect for anyone who attends the hearings. That would
 21 mean a test before leaving home and, on one day during
 22 the week, before arrival at court."
 23 And finally, we were advised that when the national
 24 lockdown is eased, the inquiry can look at supporting
 25 more people to attend the hearings in person depending

4

1 upon the national guidance at the time.
 2 At paragraphs 24 to 33 of our note, we identified on
 3 a provisional basis the views of the inquiry legal team
 4 about the way forward. As will be obvious, that was at
 5 a stage in which we had received the advice of Public
 6 Health England but had not seen the submissions of core
 7 participants. In short, in the note, we indicated that
 8 we would support the following approach.
 9 The attendance of four or five family members in the
 10 main hearing room possibly with a family
 11 legal representative and the representative of the
 12 witness giving evidence also being present. That, as
 13 will be apparent, represented a significant change on of
 14 the position as at between 18 January and 22 February
 15 (sic) where no family members were present in the
 16 hearing room.
 17 It must be recognised, we observed, that this
 18 approach is not risk-free and that every step should be
 19 taken to reduce risk. That means, we suggested, that
 20 any person wishing to attend should undertake an
 21 individual risk assessment and agree to double testing.
 22 Sir, pausing for just a moment, if it makes anyone
 23 feel more comfortable with that as a proposition, I can
 24 confirm that the inquiry legal team, and indeed you,
 25 sir, have been adhering to that approach.

1 Attendance by family members would, on the approach
 2 we described in the note, be on a weekly as opposed to
 3 daily basis. We were clear in the note that those who
 4 attended would need to be resolved by the families and
 5 their lawyers, not by the inquiry legal team or the
 6 inquiry more generally, and we were also clear that
 7 there should be a further review of the hearing
 8 arrangements on or about 3 March by which stage the
 9 Prime Minister will have set out the Government's plan
 10 for exiting this third lockdown, that announcement is
 11 due, as everyone knows, on 22 February.
 12 In response, we have received submissions from all
 13 of the family core participants and from several of the
 14 organisational core participants. Whilst there is
 15 certainly not unanimity on the way forward, far from it,
 16 the submissions are, in our view, highly constructive
 17 and they recognise the efforts that the inquiry has made
 18 to continue to sit during a period of national crisis in
 19 a way that permits participation by those with the most
 20 direct interest in the inquiry.
 21 It is helpful to provide a high-level summary of the
 22 responses we have received. We'll do that next. We'll
 23 begin by dealing with the submissions made on behalf of
 24 the families.
 25 There was no unanimity among the families'

1 represented by Slater & Gordon, whose submissions appear
 2 at page 25 of the hearing bundle. Some families,
 3 we were told, see significant value in the continued
 4 momentum of the hearings, whereas others have found the
 5 recent lack of in person support and the intrusion of
 6 the proceedings into their homes traumatic, even
 7 harmful. It is made plain that a majority of the
 8 Slater & Gordon families favour continuing as the
 9 inquiry legal team has proposed, but a significant
 10 minority of the families ask that the inquiry pauses for
 11 what is described as a period of weeks until such time
 12 as it is possible that the inquiry can resume sitting in
 13 the manner adopted before Christmas.
 14 Sir, we consider that it is perfectly understandable
 15 that different families may have different views even if
 16 they are represented by a single team, and each view is
 17 of course as valuable as the next.
 18 Similarly, there was no unanimity among the families
 19 represented by Hogan Lovells, whose submissions appear
 20 at page 33 of the bundle. Some families, we were
 21 informed, consider that the proceedings should continue
 22 if at all possible and they therefore support the
 23 approach we suggested in our note of 8 February. The
 24 Hogan Lovells submissions explain that among other
 25 families, however, even at the time of the 14 January

1 hearing, there was a real strength of opposition to
 2 evidence of substance being called in their absence.
 3 Since then, the concerns of those families have been
 4 (inaudible: distorted) and they, as it's expressed, urge
 5 the inquiry in the strongest possible terms to defer any
 6 further witness evidence until at least that group of
 7 families who have been attending the hearing room
 8 routinely is able to be there in person. That's
 9 paragraph 8 of those submissions.
 10 The families represented by BJC and Hudgells --
 11 their submissions are at page 30 of the bundle, express
 12 the view that the current arrangements -- namely those
 13 in place between 18 January and the middle of February,
 14 should continue until the review date in early March.
 15 It is suggested that the arrangements remain exactly as
 16 they are so long as those arrangements remain safe.
 17 As for increasing the number who attend in person to
 18 include family members, the submissions observe that the
 19 greater the number of people who attend, the greater the
 20 risk to the process, and suggest that the correct
 21 balance has been reached so far.
 22 Finally, so far as the families are concerned, the
 23 families represented by Addleshaw Goddard -- their
 24 submissions are at page 22 of the bundle -- agree that
 25 it is, as they put it, of the utmost importance that the

1 oral hearings continue and they express their support
 2 for the position set out at paragraphs 24 to 33 of our
 3 note, which we have summarised already.
 4 As for the organisational core participants, NWFC —
 5 their submissions are at page 46 — agree with the
 6 inquiry legal team that it is of a high degree of
 7 importance that the inquiry’s oral evidence hearings
 8 continue and that an adjournment should be avoided if at
 9 all possible. They raise, however, the question of
 10 whether it is prudent to alter the arrangements that
 11 have been in place since the hearings resumed in January
 12 and indeed they support the continuation of those
 13 arrangements unchanged. In short, therefore, the
 14 position of NWFC mirrors that of the BJC and Hudgells
 15 families.
 16 NWAS, whose submissions appear at page 50 of the
 17 bundle, describe the unique challenges that it continues
 18 to face in responding to the ongoing health crisis.
 19 NWAS considers that the arrangements in place since
 20 18 January have generally worked well and NWAS is
 21 supportive of the position proposed by the inquiry legal
 22 team in the note of 8 February.
 23 GMP, at page 45, state that it is important that the
 24 work of the inquiry continues if at all possible and GMP
 25 regard the proposals of the inquiry legal team as being

1 a balanced and appropriate way of proceeding.
 2 BTP, at page 49, is generally supportive of the
 3 position of the inquiry legal team as set out in the
 4 note of 8 February.
 5 ShowSec, at page 54, similarly agrees with your
 6 team, sir, on the way forward.
 7 In the circumstances, as we have just explained,
 8 it is clear that a majority of core participants,
 9 including a majority of the bereaved families, are in
 10 broad agreement with the proposals made by the inquiry
 11 legal team in the note of 8 February or, at the very
 12 least, they favour continuing to sit from 22 February as
 13 we did from the New Year.
 14 However, it would be wrong, in our view, for
 15 a decision to be made on future progress on a purely
 16 numerical basis and for no regard to be had to the
 17 concerns raised about the impact upon the welfare of
 18 some bereaved families of viewing the proceedings
 19 remotely.
 20 As a result, in the period since receipt of the
 21 submissions of the core participants on Friday last
 22 week, the inquiry legal team has worked hard with the
 23 secretariat to identify additional measures that may be
 24 taken to help those in the category we have just
 25 mentioned. And where we have reached is as follows.

1 First, it will now be possible safely to accommodate
 2 seven family members in the hearing room itself. Two
 3 additional family members may be accommodated in
 4 courtroom 10. In courtroom 9 we will accommodate
 5 a representative of the families and a representative of
 6 the witness giving evidence. And in part this will be
 7 achieved by reducing the members of the inquiry legal
 8 team present in the hearing room to two.
 9 Second, the secretariat has investigated the
 10 possibility of establishing a COVID—secure neutral
 11 viewing venue. Those are locations that are not the
 12 homes of the families. They will have proper viewing
 13 facilities, a laptop showing the real time transcript,
 14 if needed, and stable Wi—Fi. It is believed that it
 15 will be possible to establish such a venue in time for
 16 22 February with the most likely venues within that time
 17 frame being Sheffield and Liverpool.
 18 Pausing for one moment, in a conversation I had with
 19 Mr Cooper just before we began at 11 o’clock, he
 20 indicated to me that some Slater & Gordon families have
 21 raised the question of whether, if staff will be at the
 22 venues in Sheffield and Liverpool, Spinningfields cannot
 23 also or instead be re—opened. The answer, as we
 24 understand it, and it may be necessary to deal with this
 25 in further detail in writing, is that Spinningfields

1 cannot be re—opened at the moment because that would
 2 involve increased travel across national boundaries.
 3 The reality is that Public Health England will not
 4 as matters stand support the re—opening of
 5 Spinningfields, but may we be clear that we absolutely
 6 recognise the importance of Spinningfields to the
 7 families and we will continue to push and have pushed to
 8 date for Spinningfields to re—open as soon as it is
 9 safe.
 10 In light of the further work that has been
 11 undertaken over the weekend and yesterday, the proposal
 12 of the inquiry legal team for your consideration and
 13 indeed for submission by the core participants is now as
 14 follows.
 15 The hearing should, in our submission, resume on
 16 22 February and we should proceed to hear the evidence
 17 currently scheduled. I should add that a schedule has
 18 been circulated for core participants. That hearing
 19 should not be an entirely remote hearing and indeed
 20 no one has argued for that. In other words, there
 21 should be some physical presence in the hearing room in
 22 Manchester.
 23 As for those attending the hearing room, those
 24 attending should be you, sir, the member of CTI asking
 25 questions, a member of STI, and the witness.

1 In addition, we propose that there should be up to seven
 2 family members present within the hearing room.
 3 Furthermore, two additional family members should be
 4 accommodated in courtroom 10, and in courtroom 9
 5 a representative of the family and of the witness and
 6 a member of the press should be accommodated. It is
 7 possible, we emphasise, to make submissions from that
 8 courtroom and access to the families and witness is
 9 obviously readily achieved.

10 All of those attending the hearing room will need to
 11 be the subject of an individual risk assessment in
 12 respect of their travel and will have to carry out
 13 a COVID self-test prior to travel and on arriving in
 14 Manchester prior to attendance at court one day during
 15 the sitting week. And by all, we mean all, including,
 16 sir, you and your legal team.

17 We need to be plain that the inquiry cannot be
 18 expected to manage which family members are to attend
 19 the hearing in person. For reasons that are perhaps
 20 beyond obvious, it would not be right in our submission
 21 to expect us to do so. The bereaved families have, as
 22 we have seen for ourselves, on a daily basis provided
 23 support for each other to an extent that is striking and
 24 enormously to their credit, and we are confident that
 25 they will understand to whom attendance in person is

1 currently necessary from a well-being point of view and
 2 make this new approach work.

3 I can say from discussions that I've had this
 4 morning with leading counsel for certain families, I am
 5 satisfied that our confidence in that regard is not
 6 misplaced.

7 We judge that the risk of over-subscription is small
 8 at this stage, although we observe that who needs to
 9 attend, emphasising needs to attend, may obviously vary
 10 from time to time.

11 Furthermore, having regard to what was said by the
 12 Prime Minister last evening, we are cautiously
 13 optimistic that in the next few weeks it will be
 14 possible to increase the number of family members who
 15 attend the hearing room in person and that will reduce
 16 the small risk of over-subscription even further.

17 The purpose of the hearing on or about 3 March is to
 18 assess whether we can take the numbers higher and we
 19 consider that it is likely that further reviews on
 20 a regular basis will be necessary as we increasingly
 21 emerge, as we hope will occur, from lockdown.

22 May we be absolutely plain, sir, as we're sure is
 23 clear to all concerned, particularly the bereaved
 24 families, our strong aim, our determination, is to have
 25 in the hearing room those who want to be there and all

1 of them.

2 Alongside this increase in numbers in the hearing
 3 room and adjacent courtroom, we will establish a neutral
 4 viewing venue if that would assist in ameliorating the
 5 welfare concerns that have been raised and which we, as
 6 the inquiry legal team, recognise as entirely genuine
 7 and we would invite counsel for the families to indicate
 8 whether they see benefit, material benefit, in such
 9 venues either now in their submissions or in writing
 10 within the next 4 hours so that the arrangements can be
 11 made if necessary.

12 The final thing, sir, to add is that we intend to
 13 continue the 9 am meetings between the inquiry legal
 14 team and the families who attend remotely. We consider,
 15 and we hope others will agree, that those meetings have
 16 worked well as a means of setting out in a neutral way
 17 the evidence that is to be heard that particular day
 18 and, in particular, identifying any aspects of it that
 19 may be particularly distressing. Those meetings have
 20 also enabled us as the inquiry legal team to maintain
 21 contact between the inquiry and the families, which is
 22 of considerable importance to us.

23 Sir, that's all we propose to say at this stage.
 24 What we'll next do is invite submissions in the
 25 following order. First of all, Mr Cooper Queen's

1 Counsel on behalf of the Slater & Gordon families. Then
 2 Mr Atkinson Queen's Counsel on behalf of the
 3 Hogan Lovells families. Then Mr Weatherby Queen's
 4 Counsel on behalf of the BJC and Hudgells families,
 5 followed by Mr Gozem Queen's Counsel on behalf of the
 6 Addleshaw Goddard families. Then Mr Smith Queen's
 7 Counsel on behalf of NWFC, if he wishes to add anything
 8 to his submissions in writing, and that observation goes
 9 for all of the organisational core participants.

10 After Mr Smith, Ms Roberts Queen's Counsel on behalf
 11 of Nwas, although she has indicated that she currently
 12 does not intend to develop or repeat her written
 13 submissions. Then Mr Horwell Queen's Counsel on behalf
 14 of Greater Manchester Police, Mr Gibbs Queen's counsel
 15 on behalf of British Transport Police, Mr Laidlaw
 16 Queen's Counsel on behalf of ShowSec, and finally I have
 17 been informed that Mr De Simone is attending as a member
 18 of the press and of course, sir, I know that you would
 19 wish to hear submissions from him if he has any.

20 Having made those introductory and, we very much
 21 hope helpful remarks, may we invite submissions from
 22 Mr Cooper.

23 SIR JOHN SAUNDERS: Thank you, Mr Greaney.

24 Before Mr Cooper starts, can I just express my
 25 thanks, whatever the outcome of this hearing is, for the

1 efforts which have been made by the secretariat, which
 2 have been extensive, to try and put arrangements in
 3 place which will enable us to continue. I say that
 4 without prejudice to what the decision may be at the end
 5 of the hearing. But thank you to them.
 6 Mr Cooper.
 7 Submissions by MR COOPER
 8 MR COOPER: Thank you, sir. Can I immediately endorse the
 9 observations that you have just made on behalf of the
 10 work of the secretariat. As you know, and as you would
 11 expect over the last few months since this hearing
 12 began, we have worked, as all CPs have, in close liaison
 13 with the secretariat and we find it a fruitful and
 14 fulfilling professional relationship, which has worked
 15 well for the inquiry and I hope for you, sir, as well.
 16 In saying that, can I also pick up on what
 17 Mr Greaney said about the 9 o'clock meetings in the
 18 morning. I have attended on those with my lay clients
 19 or those that wish to attend, and again have found them
 20 very important indeed, particularly in this time of
 21 virtual practice so far as the inquiry is concerned.
 22 They are an example of the open and transparent approach
 23 being taken by your legal team, and indeed by the
 24 inquiry, so far as it is appropriate, to those of us
 25 that are also participating in the process. They are

1 an important part, we submit, of the process presently
 2 and we commend them to you, sir. I'm sure you've been
 3 having reports back about them, but you should know from
 4 us they are received very well by those we represent and
 5 long may they continue.
 6 You have had our written submissions as far as this
 7 matter is concerned and I know that you will have
 8 carefully perused them, but I'm also very much aware
 9 that those I represent are listening keenly to this, as
 10 they listen to all sections of the inquiry, but
 11 particularly keenly to this, anxious as they are to
 12 maintain their full participation, as you are, in the
 13 process. So if you'll forgive me if I will take you to
 14 certain parts of our written document to emphasise
 15 matters that are important to those we represent.
 16 You will see in paragraph 2 of our document that
 17 we have, as Mr Greaney has indicated, taken time to
 18 speak to all of our clients and again as Mr Greaney has
 19 indicated and as you predicted some time ago there is
 20 not necessarily going to be a clear, unified and
 21 definitive line, perfectly properly so, between all of
 22 those we represent and others as well. So in the
 23 submissions that I make to you today, I emphasise again
 24 for those that instruct us and are listening, I take no
 25 particular weight way one or the other as far as the

1 views expressed of our lay clients are concerned and we
 2 represent them neutrally and equally as they are of
 3 equal importance and I think, as you said, sir, this is
 4 not a numerical exercise but one where we take into
 5 account all views that are being taken and so that will
 6 be the tenor of my submission to you today, simply
 7 reflecting the views, the at times slightly nuanced
 8 views, if I may put it that way, of those we represent.
 9 The important submission we make firstly is that, so
 10 far as we can achieve it, momentum of the proceedings is
 11 vital in whatever form it takes. Any long break or
 12 break at all in the process is something we would wish
 13 to avoid and, I think I submit with a unanimous approach
 14 here as far as we represent our clients, it's something
 15 we do not urge on the inquiry. Momentum certainly in
 16 some form should be maintained.
 17 The majority, as you have seen, sir, in our
 18 submission at paragraph 2.2, paragraph (a), the majority
 19 view expressed to us is in favour of the hearings
 20 continuing virtually as proposed. Our clients follow
 21 the proceedings in numerous ways at numerous times and
 22 dealing with numerous aspects of evidence that it is
 23 presented. But the virtual continuation of the process
 24 is, as it were, a bottom line, if I can put it that way,
 25 as far as those we represent are concerned.

1 A significant minority of our families of those we
 2 represent, perfectly reasonably, suggest that there be
 3 a pause in the process for only a period of weeks if
 4 that is an approach that commends itself to you, sir,
 5 again emphasising our key submission here of momentum
 6 being maintained.
 7 Those that are of this view are very keen and
 8 anxious to fully and effectively participate within the
 9 hearing, present and indeed communicating directly so
 10 far as they can and not virtually with their legal teams
 11 and hearing the evidence as it is presented. Of course
 12 they have been totally understanding of the unusual, to
 13 put it mildly, circumstances that we find ourselves in
 14 and have participated fully as far as the virtual
 15 process is concerned since Christmas. But again, the
 16 magnitude of the impact of not actually being in the
 17 hearing room, not being amongst other families and not
 18 being able to speak and communicate directly with their
 19 legal team should not be underestimated, sir, and I know
 20 you do not underestimate that.
 21 There is the issue, as we touch upon in our
 22 document, of the psychological barriers that are
 23 presented by a virtual presentation. If I might just
 24 digress a little from the written submissions here and
 25 deal with a number of instructions on that particular

1 point we've had most recently from a number of our
 2 clients . It represents a nuance, as it were, on this.
 3 Without any doubt whatsoever, there are difficulties
 4 that have been presented generally of the position , or
 5 indeed one might put it even stronger at times, the
 6 violation of such horrible material being raised within
 7 the family and home environment, unavoidable but
 8 nonetheless a real issue and a real problem.

9 But there are forthcoming chapters within your
 10 inquiry, sir, that I am instructed to submit this upon.
 11 They are not chapters, and I'll use an example of
 12 chapter 12, that a number of our families would like to
 13 watch virtually . They would want to be present in your
 14 hearing room when their loved ones are being dealt with.
 15 This is an issue not only of participation but it is
 16 also an issue of psychological care of those we
 17 represent. I use chapter 12 for instance as an example
 18 of a chapter where we submit to you that the opportunity
 19 of families , so far as it is possible, within the
 20 pandemic situation we face, that the families should
 21 have an opportunity of being in the hearing room when
 22 their loved ones are being dealt with, for instance,
 23 within the aspects of chapter 12.

24 What we are suggesting as far as that is concerned
 25 for your consideration, sir , is that obviously -- and

1 you've already marked -- you have heard Mr Greaney's
 2 submissions, there will be a reasonably swift review of
 3 any guidelines or any rules that you put in place
 4 today -- but in any event, whatever form that review in
 5 due course may take, there be certain chapters that, so
 6 far as we can, be sacrosanct and be done in such a way
 7 where the families can attend, pandemic permitting,
 8 personally and be present.

9 Our submission, for instance, is chapter 12 is an
 10 example of where a number of those we represent would
 11 find it intolerable to watch virtually, I put it as
 12 strongly as that, for the content in those chapters.
 13 But again as I have indicated, sir, there is the general
 14 barrier that is presented by hearing matters virtually
 15 within their home rooms.

16 The helpful submissions -- and again, sir, as you
 17 can tell , we have had fruitful conversations with
 18 Mr Greaney and his team over the last few weeks on this
 19 issue and I was aware of the very welcome increase in
 20 numbers that it is suggested that families may attend
 21 the hearing room and court 9, the overspill . And
 22 of course, you can rely upon the CP family teams
 23 cooperating amongst themselves to assist the inquiry in
 24 the presentation of individuals who would require to be
 25 there.

1 We only -- on this issue -- and this is not meant to
 2 be a criticism of anyone, far, far from it -- we only
 3 again raise the matter we raised when we were last
 4 before you on this issue concerning the numbers of
 5 people in rooms. There remains that disjunct between
 6 the number of people allowed, for instance, in
 7 Crown Courts and the number of people allowed in the
 8 Court of Appeal, and I submit from personal experience,
 9 and there are a far higher number of individuals allowed
 10 in those courtrooms than seem to be being permitted by
 11 Public Health England in your inquiry.

12 I'm sure, and I do understand there may be a good
 13 reason for that, one of them being the size of the room,
 14 another perhaps being methods that could be put in place
 15 in the Crown Court or the Court of Appeal, but the
 16 latter point I do not see and in our submissions our
 17 families remain a little mystified as to why it is the
 18 Crown Courts and Court of Appeal have accommodated a far
 19 higher number of participants than Public Health England
 20 seem to be advising you.

21 I raise this because if there's any more material
 22 that you or Mr Greaney can give us today to put our
 23 minds at rest -- when I say "our minds", our client's
 24 minds at rest -- that would be certainly of reassurance
 25 to them.

1 SIR JOHN SAUNDERS: Mr Cooper, I can assure you this point
 2 is taken up regularly with Public Health England.
 3 Despite the comparison being made, they remain adamant
 4 in what they say. I'm not sure it's for me to say what
 5 the reasons for that are or even to speculate what they
 6 are, but we'll continue to say this to Public Health
 7 England and we are assured that the Crown Courts and the
 8 Court of Appeal are perfectly safe (inaudible:
 9 distorted) the point very well.

10 MR COOPER: I'm grateful for that, sir, and I do appreciate
 11 and again in past dealings both -- with all of this
 12 inquiry, we take that as read. We would, and this is no
 13 criticism again of either you or indeed your team,
 14 we would publicly press Public Health England to
 15 candidly, so far as they can, give you information as to
 16 why it is, because we simply do not understand it and
 17 we have no reason for it, and it is important, as far as
 18 our families are concerned, that they participate and be
 19 able so far as they can -- and you know, sir, there are
 20 a number of families who have chosen -- and there are
 21 perfectly valid choices to watch virtually or attend.
 22 But there are a number of families, and you'll have them
 23 in your mind's eye now, who have chosen to be in the
 24 hearing room virtually every day since September. It is
 25 an important process for them to hear the evidence,

1 it is an important process for them to participate, but
 2 it's a cathartic process as well and while the inquiry
 3 is not primarily here for a cathartic process, it can
 4 offer that by simply allowing families to attend if they
 5 wish.
 6 So moving on from that point, I would urge you or
 7 your inquiry team to press Public Health England. And
 8 we ask the question: don't the families deserve
 9 a reasoned explanation as to effectively why they,
 10 Public Health England, are excluding them? Because that
 11 is what it comes down to: it's not you that's excluding
 12 them, it's not the inquiry legal team that's excluding
 13 them, it's the advice of Public Health England that's
 14 excluding them.
 15 SIR JOHN SAUNDERS: Mr Cooper, I think one of the factors
 16 which perhaps I should mention which has been mentioned
 17 to us is the fact in this inquiry we have people coming
 18 more from different parts of the country, so crossing
 19 barriers between different areas. I think that's
 20 a significant point, but we will keep pressing.
 21 MR COOPER: Thank you, sir. Just joining up with that, it's
 22 a similar question we have of Spinningfields. We hear
 23 the same explanation, which may be a perfectly valid
 24 explanation, given for Spinningfields. But as you
 25 raised with me, the issue of people coming from

25

1 different areas of the country, again the families are
 2 somewhat perplexed that that perhaps doesn't apply to
 3 Sheffield and doesn't apply to Liverpool but does apply
 4 to Spinningfields. Really, Spinningfields is a victim
 5 of its own success, if I may say so, so far as the
 6 families are concerned because they have found it,
 7 certainly on my instructions — and I have attended with
 8 them virtually every lunch time and seen it. It is
 9 a superb facility for them and the families get a lot
 10 out of it both in terms of being able to watch
 11 proceedings, some preferring to watch proceedings from
 12 Spinningfields rather than coming to the hearing room,
 13 but also —
 14 SIR JOHN SAUNDERS: (Overspeaking) restore it as soon as
 15 we can. At the moment neither you nor I have any idea
 16 of what the facilities in Liverpool or Sheffield will be
 17 like, nor do we actually know at the moment whether
 18 there will be any take-up and that's obviously very
 19 important for us to know.
 20 MR COOPER: Let me deal with that now. Again, I've had an
 21 opportunity of speaking with Mr Greaney this morning on
 22 this matter and indeed he raised the issue with me
 23 yesterday. I've had instructions now from my clients on
 24 those venues both in Sheffield and Liverpool, or
 25 wherever they may be proposed, and while those we

26

1 represent are, as always, grateful for the work being
 2 done on the matter, there isn't any — I was going to
 3 say no significant — any take-up as far as our clients
 4 are concerned so far as I am aware for those neutral
 5 venues.
 6 SIR JOHN SAUNDERS: Okay, thank you.
 7 MR COOPER: That's not the families in any way being
 8 negative. It's simply that they would be in Manchester
 9 at Spinningfields, they're comfortable with
 10 Spinningfields. And that's why, sir — perhaps it
 11 wasn't quite apparent why I was pressing Spinningfields
 12 so closely with you: the reason is because the neutral
 13 venues, for the reasons I've expressed to Mr Greaney and
 14 to you now, sir, are not favoured by those we represent.
 15 I wouldn't be pressing Spinningfields so closely with
 16 you if I had different instructions as far as that is
 17 concerned.
 18 On our document also, sir, at paragraph (d), we
 19 refer to uncontroversial witnesses, for want of a better
 20 expression. Broadly, that has happened, although there
 21 have been witnesses that have passed in the last week or
 22 so that — controversy isn't perhaps the word but should
 23 one say witnesses of some depth. That's as neutral an
 24 expression as I can use as possible. We feel, on behalf
 25 of our clients, we are now perhaps at the threshold of

27

1 witnesses that come in with that tranche and that many
 2 of the witnesses certainly scheduled for forthcoming
 3 weeks — not all, but a number — are witnesses of some
 4 depth and some issue and we would ask the inquiry to
 5 carefully consider what witnesses are going to be called
 6 during any period whereby (a) the families cannot attend
 7 and (b) their full legal team cannot attend.
 8 I put that in a secondary way, the families in the
 9 first way. There is a risk, and we ask the inquiry to
 10 be vigilant of it, that witnesses who are perhaps not so
 11 anodyne, for want of a better expression, are now being
 12 called for perfectly natural reason because we're
 13 getting to the crux of the issue. That may well be
 14 a matter for you to consider, sir, as to whether when we
 15 do reach that threshold, a decision has to be taken
 16 either to continue or wait for better circumstances.
 17 Sire, we have made further submissions concerning
 18 accommodation and availability, but that is within our
 19 document, which we are not going to develop because
 20 you have it in writing, as it were.
 21 Sir, as we conclude, our submissions therefore are
 22 that there is a nuanced view taken by those we represent
 23 that we submit that momentum is important. If virtual
 24 hearings have to take place, that maintains that
 25 momentum. But there must come a time when a review

28

1 urgently needs to take place as to whether witnesses are
 2 of such weight, as it were, that those we represent, and
 3 indeed their legal representatives, should be in,
 4 physically in, the inquiry room to assist you.
 5 I hope that assists. I would like to have been more
 6 definitive and straight line with our submissions but
 7 that's impossible. Unless I can assist you any further.
 8 SIR JOHN SAUNDERS: No. Clearly, we will revisit the issue
 9 not only for the reasons that you have already said,
 10 that we may get more controversial witnesses and more
 11 families feel the need to attend and wish to attend, but
 12 also the situation seems to be forever changing. We
 13 would like for a full, straight line recovery, but it
 14 doesn't seem to be happening at the moment. Obviously
 15 the situation, if it changes for the better, hopefully
 16 we can get more people back more quickly.
 17 MR COOPER: Absolutely. I have an aspect to address you on,
 18 which doesn't necessarily fit directly within this
 19 submission, but if the tribunal could perhaps refer back
 20 to me once others have made their submissions on this
 21 issue as I do have a brief submission to make on another
 22 matter.
 23 SIR JOHN SAUNDERS: Wave a hand, Mr Cooper, if we forget
 24 you.
 25 Mr Greaney.

1 MR GREANEY: Sir, three things. I suspect the additional
 2 issue relates to the date of publication of your report,
 3 volume 1 of your report, which we will have something to
 4 say about once we have dealt with the hearing
 5 arrangements.
 6 Sir, secondly, I have mentioned neutral venues in
 7 Liverpool or Sheffield as being possible to establish by
 8 next Monday. Indeed, they could be established by next
 9 Monday. We are very keen that people shouldn't think
 10 that those are the only potential venues. We will be
 11 demand-driven in relation to these venues if they are
 12 thought to be of assistance so, if there are particular
 13 parts of the country where neutral venues will be of
 14 assistance, we will look to set those venues up there.
 15 Thirdly, can we emphasise something that you have
 16 said, which is that we will continue to press Public
 17 Health England so we can get the maximum number of
 18 people in the hearing room as soon as it is safe.
 19 Having made those remarks, can I call upon
 20 Mr Atkinson.
 21 Submissions by MR ATKINSON
 22 MR ATKINSON: Sir, I hope you can see and hear me.
 23 SIR JOHN SAUNDERS: Yes, thank you.
 24 MR ATKINSON: Sir, can I begin by saying that all those that
 25 I represent are very firmly of the view that the inquiry

1 should keep going if that is possible and are grateful
 2 for the very great efforts that your legal team, and the
 3 secretariat in particular, have been making to make that
 4 possible and nothing that I say should in any way
 5 undermine their gratitude and their appreciation of the
 6 hard work that has been undertaken.
 7 It is right to say that the families have different
 8 experiences and have had different experiences of how
 9 best for them to deal with the inquiry and its hearings.
 10 There are some who have found that it is sufficient for
 11 them to have regular updates from those who instruct me
 12 as to what has transpired and to talk it through with
 13 them. There are some who have found it most helpful to
 14 watch the proceedings remotely because they are able to
 15 do so from a venue of their choosing with those of their
 16 choosing who they can discuss it with and they have
 17 found that works for them.
 18 Those in those categories clearly are content for
 19 the inquiry to continue as is proposed. I am conscious
 20 that others will be making arguments as to why that
 21 should be the case. They clearly chime with the views
 22 of those of my families and I say no more about that.
 23 But there are those amongst those who I represent
 24 who have a very different view. They have from the very
 25 beginning felt very strongly that it was vitally

1 important for them that they should always be present to
 2 honour the memory of their loved ones and to fully
 3 understand at first –hand all that they can understand
 4 about the circumstances in which those loved ones died
 5 and what lessons can be learned for the future.
 6 They have attended the Central Criminal Court during
 7 the trial of Hashem Abedi on a very regular basis and
 8 have sought to attend your inquiry, sir, every day that
 9 it has sat. For those, the last 2 weeks have been
 10 a very painful experience. They have found having to
 11 watch these proceedings from home incredibly difficult,
 12 first because it deprives them of the opportunity to
 13 assess and see the witnesses first –hand and to honour
 14 the memory of their loved ones through being in the room
 15 with you, sir, through this process.
 16 Second, because it has brought the City Room into
 17 their living room. They have not been able to move away
 18 from the inquiry because it is in their homes. They
 19 have not been able to switch off from the inquiry
 20 because it is in their homes. And most concerningly for
 21 them, it has involved members of their households in the
 22 inquiry who had chosen not to be involved to that extent
 23 or in that way.
 24 There are no measures that the inquiry can put in
 25 place that will deal with that situation other than by

1 those of the families who I represent who are in that
 2 category being in the room with you. I have discussed
 3 with them the possibility of a neutral venue hub of the
 4 kind that Mr Greaney has discussed this morning.
 5 That is not a solution for them. They have experienced,
 6 for example, the use of Spinningfields as opposed to
 7 being in the room with you, sir, and they found that
 8 very difficult, in a group of people, much more
 9 distracting than the focus and the calm and the quiet of
 10 the hearing room. Equally, at one point during the
 11 criminal trial they experienced a remote venue in
 12 Newcastle and that didn't work for the same reasons. So
 13 they are very clear that they need to be in the room
 14 with you, sir.

15 It is right to note, as we are grateful to note,
 16 that the inquiry team's note acknowledges, not being
 17 able to be in the room does also deprive them of the
 18 support network that they have enjoyed hitherto, their
 19 legal representatives, the Resilience Hub, whose huge
 20 support they have been very grateful for, and the
 21 support of their fellow family members from the other
 22 families who have been in the room with them. That has
 23 all been vitally important to them and that again is
 24 only achievable if they are in the room with you.

25 It is against that background that we have sought to

1 engage with the inquiry team and with our fellow family
 2 teams to see if there is a way through this that can
 3 ensure that those who can only deal with this inquiry by
 4 being in the room with you are able to be so.

5 On our maths and our enquiries this morning,
 6 (inaudible: distorted) 11 family members there is not at
 7 present, on what is proposed by the inquiry team,
 8 11 seats for them either in the room or in the annex.
 9 And I should say that both from a physical point of
 10 view, given certain challenges that a number of, one at
 11 least of my family members has, and given also the
 12 reality that if they are not in the room with you, sir,
 13 then they might as well be in a remote hub rather than
 14 being in an annex down the corridor so far as they are
 15 concerned, the reality is that these proposals, grateful
 16 though we are for the huge efforts that have been put
 17 into them, do not meet the needs of those who you have
 18 always promised, sir, would be central to your process.

19 They feel they are being excluded, they feel that
 20 the memory of their loved ones is being dishonoured
 21 through no harmful view but just because they cannot be
 22 given what they need to have. If that sounds selfish,
 23 sir, then, with the greatest of respect, if anyone is
 24 entitled to be selfish in this process, it is the
 25 families. They have thought long and hard and they have

1 tried very hard to be accommodating but they have
 2 reached a point where they cannot.

3 So the reality, it seems, for those who instruct me
 4 and myself, sir, is that there is a need for a short
 5 pause to these inquiry hearings to allow for measures to
 6 be put in place so that all those of the families who
 7 want to be in the room can be. We recognise that
 8 changes are happening all the time, that risk
 9 assessments are changing all the time, and that by the
 10 beginning of March the position may well be different.

11 Our application therefore is, sir, that you pause
 12 for 2 weeks. That would be the loss of 5 days of
 13 sitting time, which, if we're able to go back to
 14 a four-day week on our subsequent resumption, we would
 15 make up very quickly. It is therefore a short loss of
 16 time in the very immediate term to ensure that those who
 17 need to be at the centre of these proceedings can be.

18 We have set out the difficulties that our families
 19 face in our written note, but those, I think, are the
 20 core messages that they would wish, through me, for you
 21 to understand from them. We recognise that there are
 22 some of our families who wish we would keep going, but
 23 we submit that it is essential that all of the families
 24 feel their voice is being heard, their wishes are being
 25 respected, and a short pause now, we submit, can achieve

1 that. And, with very great reluctance therefore,
 2 that is, I'm afraid, still what we would ask you to do.
 3 SIR JOHN SAUNDERS: Thank you, Mr Atkinson. Let me say at
 4 once that it certainly is not selfish of any of the
 5 families to express the views that they have and I would
 6 never regard it as that, so please everyone must put
 7 that out of their minds.

8 You're saying that we need 11 spaces in the room for
 9 family members. Are those all people in your -- are
 10 they your CPs that you're representing or is that
 11 counting up with other people as well?

12 MR ATKINSON: It's counting up with other people as well.

13 SIR JOHN SAUNDERS: I'm well aware of people in the hearing
 14 room all the time. (Overspeaking).

15 MR ATKINSON: From those who I represent, it would be three
 16 people from two households, although they have always
 17 formed a bubble and therefore I suspect for Public
 18 Health England purposes would be one household. We
 19 understand from those who instruct Mr Cooper that there
 20 are eight further people from three households that
 21 would equally regularly be wishing to be in the room as
 22 well, who were, in fairness those who were in the room
 23 most days with those three that I have mentioned of my
 24 families in the run-up to Christmas. So there is that
 25 consistency there, so we recognise we would not and

1 those of my families who have this concern would not
 2 want to feel that they were pushing one of those others
 3 out of the room for them to be there. They have had
 4 very great concern that effectively the families are
 5 being set against each other in this regard, again not
 6 deliberately, but that is how they see it if there is
 7 not enough room for all those who wish to be there.
 8 SIR JOHN SAUNDERS: Right. Mr Atkinson, just saying this,
 9 I'm well aware of the three people who you represent who
 10 have been in the room all of the time. I obviously
 11 don't do a daily count, and there are certainly a couple
 12 of people, other people, who are there all of the
 13 time -- that is my impression and I'm not relying
 14 entirely on this -- and then other people are there some
 15 of the time but not all of the time, which suggests that
 16 their view is there are particular witnesses who they
 17 are particularly keen to see rather than feeling they
 18 need to be in the room the whole time.
 19 That seems to be the position to me. I see
 20 Mr Cooper has now come up on screen. Would you like to
 21 say anything about your eight, Mr Cooper?
 22 MR COOPER: Thank you, sir, I'm loath to interrupt
 23 Mr Atkinson, but we submit there are three from the
 24 Hurley family who have been regularly in attendance,
 25 including Bradley. There have been three from the

1 Brewster family, who I have been instructed, have been
 2 regularly in attendance, and two from the Murray family,
 3 Figen and Stewart, who have been regularly in
 4 attendance. So for us, it's the Hurleys, three, the
 5 Brewsters, three, and Figen and Stewart, two.
 6 SIR JOHN SAUNDERS: Okay.
 7 MR GREANEY: Sir, may I add that what you've been told is
 8 entirely accurate. We had often had 11 family members
 9 in the hearing room before we finished for Christmas,
 10 but we had sometimes had a smaller number than 11.
 11 I was told once I'd finished my submissions at the
 12 beginning of today that the number of persons who wanted
 13 to attend was 11 in four households. Once I'd seen
 14 those numbers, I liaised with Mr Suter and in turn
 15 Mr Suter liaised with Mr Shane Smith of Slater & Gordon,
 16 encouraging him to make contact with Mr Baxter of
 17 Hogan Lovells, and what Mr Atkinson probably will not
 18 know, given that he's been making his submissions and
 19 Mr Cooper may not know, is that Mr Smith and Mr Baxter
 20 are in liaison now to see what progress they can make.
 21 We will, of course, work with them in order to see
 22 whether we can support or assist them in any way.
 23 SIR JOHN SAUNDERS: Okay. Thank you.
 24 Mr Atkinson, do you want to come back?
 25 MR ATKINSON: Sir, can I just add two things. First, those

1 are the eight that we had anticipated, and I agree that
 2 they were very regular attenders before Christmas.
 3 The second thing I did want to add was to say that
 4 we entirely agree with Mr Cooper that when we reach
 5 chapter 12 different considerations will apply, and
 6 equally there may be witnesses during chapter 10 who
 7 have a particular relevance to a particular family and
 8 we would of course, I'm confident, accommodate that.
 9 It is the wider picture of chapter 10 when we reach
 10 people who were in the City Room on the night that it
 11 becomes difficult and I'm sorry to be the one who's
 12 being difficult, but it is so important to those
 13 I represent that it's only right that I am, I'm afraid.
 14 SIR JOHN SAUNDERS: We do well understand.
 15 MR ATKINSON: Unless I can assist further, those are my
 16 submissions.
 17 MR GREANEY: Can I add, and I'm very keen that this doesn't
 18 become a form of negotiation between counsel over the
 19 link, but what we are seeking to achieve is a resolution
 20 for the period up until 3 March. We entirely understand
 21 that there will come a time during chapter 10 when
 22 important witnesses who entered the City Room will be
 23 giving evidence and more than 11 people may well wish to
 24 be present within the hearing room, but we're simply
 25 trying to manage a situation over the course of the next

1 few weeks when we do not believe that any witness who,
 2 to use our phrase, is substantially controversial
 3 in that way will be giving evidence.
 4 Sir, I'm next going to invite Mr Weatherby to make
 5 submissions on behalf of his families.
 6 SIR JOHN SAUNDERS: Thank you.
 7 Submissions by MR WEATHERBY
 8 MR WEATHERBY: Can you see me, sir?
 9 SIR JOHN SAUNDERS: I can and I can hear you, thank you,
 10 Mr Weatherby.
 11 MR WEATHERBY: Thank you. As you have seen from our written
 12 submissions, the families I represent believe that the
 13 current arrangements should continue until the next
 14 review, which your team has indicated should be on
 15 3 March. Just to put perspective on that, that would be
 16 four full days and two half days of evidence, so it'd be
 17 for a very limited period indeed.
 18 In making those submissions, we want to make it
 19 completely clear that the view of the families is not to
 20 be taken as underplaying the importance of the right of
 21 themselves and other families to participate by
 22 attending, nor do we view the different views of other
 23 families as being any less legitimate to theirs. So
 24 it's important that I make that clear.
 25 Can I also say that there are few right answers

1 here. It is a very difficult decision that you have to
 2 take here, and whatever decisions are taken we put on
 3 record that both you and your team have very plainly and
 4 very carefully considered the options and there has been
 5 communication with your team with us over the last few
 6 days to make sure that those viewpoints are fully
 7 understood and taken account of. We think it's
 8 important to put that on record.

9 We don't again in any way wish to disrespect the
 10 views of those who think there should be a short pause,
 11 that's a perfectly legitimate submission to make, but
 12 I think it is right that there is a majority of both
 13 families and others who do wish to maintain the
 14 momentum, as it has been put, and it's important in our
 15 submission that that is recognised. Momentum itself is
 16 important to reducing the ongoing stress of the families
 17 and no doubt witnesses and others too.

18 But if that were to be your decision, then of course
 19 it would be only a short pause. The central issue is
 20 of course how much physical access there should be if
 21 the hearings do continue, and that is, as I have already
 22 said, a very short-term question for today. We all want
 23 to return to fully open hearings as soon as possible.
 24 There is cause for optimism at the moment, but of course
 25 this is a crisis which has been completely unpredictable

1 from its outset.

2 The ability to be present is an important aspect of
 3 effective participation and it must -- and I am stating
 4 the obvious here, but it's important that I do so -- be
 5 balanced against the risks here. And there are risks as
 6 noted in your team's document at paragraph 26.
 7 Of course those risks, as is obvious, is to life and
 8 serious illness, hence the submission that we have made
 9 for a safety-first approach.

10 I have little more to say. The decision today is,
 11 as I say, for a short duration until 3 March. The
 12 fast-changing situation -- we will know more at 3 March.
 13 There is cause for optimism, but only cause for
 14 optimism.

15 We very much agree that this needs to be kept under
 16 review on a daily basis and we agree that there ought to
 17 be hearings on a regular basis so views can be
 18 expressed. I don't know whether I can assist any
 19 further.

20 SIR JOHN SAUNDERS: I'm very grateful. Thank you,
 21 Mr Weatherby.

22 MR GREANEY: Sir, next, so far as submissions are concerned,
 23 Mr Gozem, please.

24 Submissions by MR GOZEM

25 MR GOZEM: Good morning, sir. You have our written

1 submissions. We really have little to add to those.
 2 We, like everyone, would like to express our gratitude
 3 to your team and the secretariat.

4 It may be that the one useful observation I could
 5 make is that as a result of email exchanges this
 6 morning, I'm able to confirm that none of our three
 7 clients intend to attend any of the hearings between
 8 now, certainly for the time being, so I take it that
 9 will mean until 3 March, which may help with the
 10 calculations about spaces. But beyond that, sir, unless
 11 I can assist you in any other way, there's nothing else
 12 I would like to add at the moment.

13 SIR JOHN SAUNDERS: Thank you, Mr Gozem, I'm grateful.

14 MR GREANEY: Sir, we have now heard submissions on behalf of
 15 each of the family teams and I'm going to ask Mr Smith
 16 Queen's Counsel whether he has any submissions to
 17 develop in addition to his written submissions on behalf
 18 of NWFC.

19 Submissions by MR SMITH

20 MR SMITH: Sir, I would only like to add this: that our
 21 submissions are not intended in any way to diminish the
 22 importance of what's been said by Mr Atkinson on behalf
 23 of the families he represents. But we do submit that,
 24 given the current situation, the inquiry legal team has
 25 struck the correct balance between risk and the

1 importance of the work of the inquiry continuing.

2 That's all I want to say in addition to the written
 3 submissions we've lodged.

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

5 MR GREANEY: Sir, I have had an indication from Ms Roberts,
 6 who represents NWAS, and Mr Horwell who represents
 7 Greater Manchester Police that they do not wish to say
 8 anything over and above that which is contained in their
 9 written submissions. So I will ask Mr Gibbs whether he
 10 has anything he would like to add on behalf of BTP.

11 Submissions by MR GIBBS

12 MR GIBBS: Thank you. It's a very short point. Annex A to
 13 counsel to the inquiry's note back on 9 February doesn't
 14 give specifics about what is proposed should happen if
 15 you go ahead in the weeks of 29 March and 5 April. I'm
 16 sure that's something which is a detail to be sorted out
 17 later and not your primary concern today, but obviously
 18 one wouldn't be sitting -- I image we wouldn't be
 19 sitting on Good Friday or Easter Monday, but there are
 20 eight other working days in that fortnight and eight
 21 working days is potentially a lot of progress.

22 SIR JOHN SAUNDERS: Okay, thank you, Mr Gibbs.

23 MR GREANEY: Sir, at the moment the proposal is that for
 24 good reason we not sit in either of those 2 weeks in
 25 fact, but no doubt that's something we can come back to

1 in due course if needs be.
 2 I have had an indication from Mr Laidlaw who
 3 represents ShowSec that he doesn't wish to add anything
 4 to his written submissions and, unless anyone tells me
 5 to the contrary, I believe that we have now heard from
 6 all of those who wish to address you on the first topic
 7 for decision today.
 8 I pause for a moment to give anyone an opportunity
 9 to disagree with me.
 10 (Pause)
 11 Sir, no one is saying anything. I know that it is
 12 not your intention to give a ruling immediately.
 13 SIR JOHN SAUNDERS: Well, I was proposing -- it's obviously
 14 important that people know what my ruling is quickly so
 15 that, if we're going on, the necessary arrangements can
 16 be made and, if we're going off, the necessary
 17 arrangements with witnesses should be made as well. But
 18 as Mr Weatherby has rightly said, it's a difficult
 19 decision, and clearly people are not going to be happy
 20 with the decision in whichever way it goes. So what
 21 I was proposing was that I would take the next
 22 25 minutes to think about it and prepare a judgment of
 23 some sort and then give that judgment at 12.30. Would
 24 that be a problem?
 25 MR GREANEY: No, sir, that would not be a problem.

1 SIR JOHN SAUNDERS: Right. If everyone is happy with that,
 2 I will give a short judgment, but it will be short, at
 3 12.30.
 4 MR GREANEY: Mr Suter will correct me if I'm wrong, but
 5 people will need to ensure that they are back on their
 6 link at no later than 12.25.
 7 SIR JOHN SAUNDERS: Okay. I'll hope to be there on the dot
 8 at 12.30.
 9 MR GREANEY: Thank you very much, sir.
 10 MR SUTER: That's correct, Mr Greaney. If everyone can
 11 keep -- the links will still work so everyone can still
 12 use the links they already have.
 13 SIR JOHN SAUNDERS: Thank you.
 14 (12.06 pm)
 15 (A short break)
 16 (12.30 pm)
 17 SIR JOHN SAUNDERS: I hope everyone can see me and can hear
 18 me. I am now going to give a short ruling on the
 19 matters which have been discussed. It will have to be
 20 short. Mr Greaney, can you hear me all right?
 21 MR GREANEY: I can hear you fine, thank you.
 22 (12.30 pm)
 23 (A judgment was given)
 24
 25 SIR JOHN SAUNDERS: I'm going to give a short judgment on

1 the matter we have been discussing. It will have to be,
 2 of necessity, short because I have had little time to
 3 prepare it. If anyone wants a more detailed written
 4 judgment, then they only have to ask and I will
 5 of course provide it.
 6 What we are deciding is whether, starting from next
 7 Monday, we can continue our hearings or whether we
 8 should stop them for 2 weeks. We have had hearings for
 9 the last 2 weeks which have been almost entirely remote.
 10 I have been present in the hearing room, as have three
 11 of the inquiry legal team, including leading counsel.
 12 Others have been able to watch remotely and all counsel
 13 for core participants have been able to ask questions
 14 remotely.
 15 For many people, participating remotely has worked
 16 well. Compared with other IT systems that I have
 17 experienced the one used by this inquiry has worked
 18 better than others and I'm very grateful for the very
 19 hard work that the IT team have put in to make sure that
 20 it does work so well, and they have provided help to
 21 those who are less IT adept, as I am.
 22 However, I accept that it is not the same as being
 23 present. People talk over each other more because of
 24 the delay, as I and Mr Atkinson demonstrated today, and
 25 I am as guilty of that as anyone. It is not as easy to

1 read the documents which come up on screen and it may be
 2 less easy to judge the reaction of the witness to
 3 questions which are put to him or her.
 4 The inquiry has over the last 2 weeks attempted to
 5 hear from less controversial witnesses, but it is not
 6 always possible to accurately predict what evidence will
 7 turn out to be controversial and what will not. While
 8 accepting the shortcomings, most people have found the
 9 system has worked satisfactorily over the last couple of
 10 weeks for hearing what the evidence is and following
 11 that as it is given.
 12 We have held this hearing to canvass views on how we
 13 should continue. We have had to have remote hearings
 14 because of the health crisis and that still continues,
 15 whatever the optimism may be.
 16 The views expressed today have varied. The majority
 17 are in favour of continuing. There are strong arguments
 18 in support of that. It is better to keep the momentum
 19 going and that is important for many CPs including many
 20 of the family members. It is also important that the
 21 inquiry is able to reach its conclusions and publish
 22 them sooner rather than later.
 23 On the other hand, some family members have been
 24 caused considerable great distress by their inability to
 25 be in the hearing room while evidence is being heard for

1 entirely genuine and understandable reasons, which have
 2 been put so persuasively by Mr Atkinson. They are not
 3 reasons that they can't follow the evidence which is
 4 being given, but it is the psychological effect on them
 5 of not being able to be in the hearing room when they
 6 want to be while this evidence is being given and having
 7 to listen to it in their houses which is and can be very
 8 intrusive and contaminating for them.

9 So there are powerful arguments on both sides and
 10 indeed advocates have found themselves in the curious
 11 position of actually arguing both points of view because
 12 not all family teams agreed with each other. Everyone
 13 is agreed that the situation will be kept under review
 14 depending on the medical situation, the health
 15 situation, as it develops. So whichever decision
 16 I make, it will only continue to be of effect before
 17 it is reviewed again for some 2 weeks, which in terms of
 18 the time we are sitting is 5 days of sitting.

19 But that argument cuts both ways: it does not
 20 support stopping the hearing, nor does it support
 21 continuing them. It is an entirely neutral fact and
 22 doesn't really assist me in making my decision.

23 What has been achieved by the secretariat for this
 24 hearing is it has now been agreed with Public Health
 25 England that we can make space for seven family members

1 for the next 2 weeks. The question is whether that will
 2 be enough. We have been encouraged to press Public
 3 Health England as to why they appear to take something
 4 of a different view as to attendance in this hearing
 5 room as compared with Crown Courts. The reason that
 6 I have heard put forward is because people coming to
 7 this hearing come from greater distances than you will
 8 commonly find in most other Crown Courts and therefore
 9 there is a risk of contamination taking place or greater
 10 contamination.

11 So will the number seven be enough? Mr Atkinson
 12 submits that it will not be and he, along with other
 13 family members or other core participants, has tried to
 14 calculate the number who may wish to be in the hearing
 15 and that number is greater than seven. But included
 16 within that maximum number are people who did attend
 17 regularly but they were not there for every witness,
 18 which suggests to me that they were, for perfectly good
 19 reason, selective about the witnesses they wished to
 20 hear from, whereas others who Mr Atkinson represents
 21 felt it necessary from a psychological point of view and
 22 an emotional point of view to be in the hearing room
 23 whatever the evidence was that was going on.

24 What is being proposed is a substantial increase in
 25 what we have been permitted to provide by Public Health

1 England for the last 2 weeks. We will continue to deal
 2 with relatively uncontroversial witnesses if we go on.
 3 I am aware that the situation may well change for parts
 4 of chapter 10 and certainly for chapter 12, but I am
 5 only looking at the moment at the next 2 weeks and what
 6 we do for that period of time.

7 The suggestion has been made and the secretariat
 8 have managed to locate accommodation within Liverpool
 9 and Sheffield where family members could go to view the
 10 evidence along with others if that's what they wanted.
 11 We will be told whether there is any take-up for that,
 12 but it doesn't look very likely at the moment.

13 Therefore I have to consider the situation on the
 14 basis that seven family members will be able to be in
 15 court, there could be others in other courts, also
 16 present at the court but in a different part of the
 17 building, over the next 2 weeks.

18 On what I have been told, I take the firm view that
 19 with the extension of numbers in the room, and with the
 20 cooperation of all family members, which I am sure will
 21 be forthcoming, we will be able to continue to make
 22 progress and hold our hearings. I am sure that those
 23 who wish to be present for a particular witness will be
 24 accommodated, but equally those who feel the necessity
 25 to be present at all times in the court for evidence,

1 I hope very much that their wishes will be able to be
 2 accommodated, as I am sure all family members will
 3 cooperate in this to try and make this work.

4 The inquiry is not proceeding as rapidly as we
 5 hoped, but that is because, as the evidence has
 6 progressed, matters have come to light which required
 7 investigation. That has been necessary and I hope has
 8 been helpful and useful and will be useful in the
 9 outcome of this inquiry. I would wish very much to
 10 avoid the situation where time became so pressing that
 11 we felt we could not go into as much detail as we might
 12 wish to do because of the delays in the inquiry and the
 13 need to bring it to a conclusion and publish our
 14 conclusions.

15 I would just ask everyone to do their very best to
 16 make this work and we will look again at it after the
 17 hearings of the next 2 weeks. I hope that those whose
 18 wishes have not come to pass, and I have not gone along
 19 with their wishes, will not feel too disappointed at
 20 that result or feel too let down by it. Can I assure
 21 you that I and the rest of the inquiry team have very
 22 much considered their position and have tried to
 23 accommodate it as far as we possibly can. So please,
 24 everyone, do their best to make it work for the next
 25 2 weeks and we will then look at it again.

1 (12.40 pm)
 2 (End of draft judgment)
 3 (12.40 pm)
 4 SIR JOHN SAUNDERS: Mr Greaney, when you started you
 5 indicated there was a member of the press who might wish
 6 to say something.
 7 Housekeeping
 8 MR GREANEY: Yes, although I have received no communication
 9 from him or from Mr Suter to indicate he will want to
 10 say anything about this issue. It's more likely if he
 11 has anything to say, it will be in relation to issue 2,
 12 which we'll deal with after lunch. But I will pause for
 13 a moment to give Mr De Simone an opportunity to say
 14 anything that he wants to.
 15 Sir, prior to breaking for lunch we would like to
 16 mention, please, the publication date for volume 1.
 17 I had anticipated that this was the issue that Mr Cooper
 18 wanted to raise, but in fact I was wrong, it's not,
 19 there is an additional short issue that he would like to
 20 raise with you once I have dealt with the publication
 21 date. We raise the publication date for information
 22 only for you at this stage and for the information of
 23 the core participants. We are not inviting any decision
 24 from you today or even submissions, although of course
 25 we won't shut out any core participant who wants to

1 respond to what we're about to say.
 2 The position is, sir, that before we broke for
 3 Christmas you indicated an intention to publish your
 4 report in three volumes with the first volume dealing
 5 with the security arrangements at the arena. Your aim,
 6 as was explained, was to publish that volume before the
 7 fourth anniversary of the arena attack and that was, we
 8 repeat, an aim.
 9 It has since become apparent for a variety of
 10 reasons that if volume 1 is to be published before the
 11 anniversary, that will not be possible earlier than 20
 12 or 21 May. That gives rise to the obvious risk that
 13 publication would overshadow or in some other way
 14 adversely affect the families on their day of
 15 remembrance and commemoration. As a result I spoke to
 16 leading counsel for the family teams some weeks ago to
 17 ask then to consult with their families on this issue.
 18 Entirely unsurprisingly, there is not unanimity.
 19 However, it is clear that there is a strong body of
 20 opinion, indeed almost certainly a majority, that
 21 favours publication not on 20 or 21 May but instead
 22 after the anniversary and indeed in June.
 23 As a result, and on balance, we consider that the
 24 risk of overshadowing the thoughts of the families on
 25 that important day is too great and that publication

1 ought not therefore to occur in May but instead in June,
 2 assuming, as we hope, that that aim remains achievable.
 3 As we indicated, we are not inviting a decision or
 4 submissions, but if any advocate wanted to say anything
 5 in response to what I have just said, we won't shut them
 6 out. I give a moment for that to occur if anyone wants
 7 to say anything.
 8 (Pause)
 9 Sir, no one is taking that opportunity, which
 10 doesn't surprise me, so I will next invite Mr Cooper to
 11 raise the point which he wants to raise and which he was
 12 good enough to tell me about in a telephone conversation
 13 just a short while ago.
 14 Submissions by MR COOPER
 15 MR COOPER: I'm grateful to Mr Greaney. In fact it touches
 16 on the observation you made, at least by introduction,
 17 on time being pressing as far as this inquiry is
 18 concerned. I'm making these very short submissions,
 19 both on instructions and also having had indicated to me
 20 by my instructing solicitor of concerns expressed by
 21 a number of those we represent.
 22 There has been a development in recent weeks where
 23 the amount of time that we, and I only make these
 24 submissions on behalf of those we represent, have had
 25 our time estimates cut short by STI as far as our

1 assessments are concerned for the examination of
 2 witnesses. And sometimes those time assessments have
 3 been cut short by a mere 15 to 20 minutes.
 4 Sir, there is concern expressed to us, and I will
 5 use some of the expressions used, that in some way the
 6 family team is being muted in the approach that they are
 7 taking to asking questions of this inquiry. I know,
 8 sir, you value our contributions, all of our
 9 contributions in this inquiry, and we have attempted,
 10 and I hope you accept, at all times to remain as
 11 succinct as possible in certain complex areas and only
 12 to examine matters that may assist you in your inquiry.
 13 But there is grave concern expressed to us, and I'm
 14 instructed to raise it now, that if the inquiry feels
 15 that it is perhaps taking longer than one might have
 16 anticipated, that is the inquiry itself, that should not
 17 affect the inquiry's insistence on taking whatever time
 18 is necessary, whatever time it takes within
 19 professionalism and a comprehensive analysis of the
 20 facts. The families would submit to you, sir, and it is
 21 really predicated on their concern that we are having
 22 our times cut short by STI and we rail to a degree
 23 against that because we're very responsible in the time
 24 we are taking, the families' effective participation and
 25 their involvement in this inquiry should not in any way

1 be inhibited.
 2 We ask you, sir, to be mindful then that we should
 3 not have, unless of course there is a perfectly
 4 reasonable reason for it, the time we suggest within
 5 reason cut in terms of our potential examination of
 6 witnesses when we as the family team have been delegated
 7 to lead on those witnesses. As you know, sir, there is
 8 cooperation, collaboration between family teams as to
 9 who leads on what witnesses. And the families that we
 10 represent are concerned that there is a potential
 11 perception -- and I emphasise that word, perception --
 12 that the family team is being in some way muted and the
 13 effective participation of them is being potentially
 14 compromised.

15 We ask you, sir, in conclusion, to observe that this
 16 inquiry will take whatever time it takes to reasonably
 17 examine the material and to allow the families to have
 18 full participation. I'm instructed to raise those
 19 matters with you, sir, as concerns have been raised
 20 directly to us by those we represent. Thank you, sir.

21 Submissions in reply by MR GREANEY
 22 MR GREANEY: Sir, could I respond very briefly and in a way
 23 that I certainly hope will be constructive and viewed
 24 positively?

25 First of all, responsibility for time being changed

1 should not be laid at the feet of the solicitor to the
 2 inquiry. The Rule 10 process is one which is managed by
 3 the whole of the inquiry legal team and not just by STI.
 4 Secondly, we are certain that all will agree that
 5 the proceedings need to be run efficiently, but also,
 6 sir, that you need to investigate all relevant matters,
 7 and furthermore, and in any event, the desire for
 8 efficiency, we acknowledge, must not be at the expense
 9 of the families or indeed any core participant being
 10 given the time that they reasonably need to ask the
 11 questions which are important to them.

12 What I have assured Mr Cooper of is that I will
 13 liaise with him and with advocates for all other core
 14 participants, including family core participants, to
 15 ensure that they have adequate time for the questions
 16 that properly they need to ask. I hope that provides
 17 some reassurance.

18 MR COOPER: I'm grateful to Mr Greaney. I hope that, you,
 19 sir, and I know that Mr Greaney does, because I took the
 20 contact him in the short adjournment we had, ensuring
 21 that he felt we were being positive and cooperative
 22 here. This is not meant in any way to be anything other
 23 than simply raising an issue of concern. We are not
 24 attempting in any way to be obstructive or indeed
 25 a member of the so-called awkward squad here. We are

1 simply trying to raise with you, sir, the points that
 2 have been genuinely made by some of those we represent
 3 and, upon instructions from perfectly sensible
 4 solicitors, I have been asked to raise with you which
 5 I have done and hopefully the matter can move forward.
 6 SIR JOHN SAUNDERS: Thank you, Mr Cooper. I'm not going to
 7 say much at this stage. I'm grateful that you're all
 8 going to talk about it. You will understand as well
 9 that I have a responsibility to make sure that while
 10 conducting the inquiry properly, it does not go beyond
 11 its proper length to do what it is meant to do, so that
 12 brings my case management skills into perspective as
 13 well.

14 Every advocate has had the experience of being cut
 15 short on some occasions and hopefully I'll make it clear
 16 when I have got the point and there's no need to press
 17 it. But we all need to cooperate in this in making sure
 18 we do the job properly, that we don't miss things, but
 19 equally we don't go beyond a proper time length to
 20 complete it.

21 MR COOPER: There's nothing we disagree about, sir,
 22 of course and I'm grateful for that.

23 SIR JOHN SAUNDERS: Thank you very much.

24 Mr Greaney, I think we're back at 2 o'clock?

25 MR GREANEY: We are. Can I say that there are very detailed

1 written submissions on the issue that we are concerned
 2 with at 2 o'clock. I expect that the CTI submissions
 3 will take no more than 20 minutes, and I hope a little
 4 less, and we hope that all advocates will be efficient
 5 in the submissions that they make and that they will be
 6 focused upon the issue that is for decision today, the
 7 decision not being whether Mr Abdalraouf Abdallah should
 8 be compelled to give evidence, but instead upon the much
 9 narrower issue of whether there should be ordered
 10 disclosure of two psychiatric reports. So yes, sir,
 11 we will start again at 2 o'clock.

12 SIR JOHN SAUNDERS: Although of course I understand this is
 13 a public hearing and therefore everyone needs to know
 14 the basis of the arguments on all sides, I can assure
 15 you, I hope, properly, that I have read every word of
 16 what everyone has written so far on the arguments, so
 17 thank you very much on that.

18 Thank you very much.

19 (12.51 pm)

20 (The lunch adjournment)

21 (2.00 pm)

22 Submissions by MR GREANEY

23 MR GREANEY: Sir, the issue for consideration this afternoon
 24 concerns, as we said earlier today, Abdalraouf Abdallah,
 25 who we will refer to as the applicant. He is

1 represented by Mr Menon Queen's Counsel and Ms Maragh.
 2 May I say at the outset there is a restriction order
 3 in place which you made on 11 February. The practical
 4 consequence of that order is that there is a delay on
 5 the live stream of 10 minutes. That means that if
 6 Mr Menon identifies anything that ought not to be
 7 broadcast, and indeed if anyone else identifies anything
 8 that ought not to be broadcast, that will need to be
 9 identified within that 10 minutes.

10 Sir, we'll deal first of all with why the applicant
 11 is relevant or rather why he has relevant evidence to
 12 give your inquiry. On 11 May 2016, following a trial,
 13 the applicant was convicted on a charge of preparing to
 14 commit an act of terrorism contrary to section 5 of the
 15 Terrorism Act 2006, and one charge of being concerned in
 16 a funding arrangement related to terrorism contrary to
 17 section 17 of the Act.

18 He was sentenced to an extended sentence of
 19 9.5 years, comprising 5.5 years' imprisonment and
 20 4 years on licence. He was released on licence in
 21 November of last year, but as is publicly known, has
 22 been recalled to prison since.

23 In opening the inquiry oral evidence hearings in
 24 September, we made reference to the applicant —
 25 MR DUNLAY: Mr Greaney, can I ask you to pause proceedings

61

1 for a couple of minutes? This is Paul Dunlay, the
 2 moderator.

3 (2.07 pm)

(A short break)

5 (2.30 pm)

6 MR GREANEY: Sir, those, like you and Mr Menon who were able
 7 to hear what I had to say first time round will be
 8 delighted that it's thought that it's necessary that
 9 I should repeat it, but I will nonetheless do so.

10 The issue for consideration this afternoon concerns
 11 Abdalraouf Abdallah, who we will refer to as the
 12 applicant. He is represented by Mr Menon Queen's
 13 Counsel and Ms Maragh. There is a restriction order in
 14 place, which you, sir, imposed on 11 February. The
 15 practical consequence of that is that there is a delay
 16 on the live stream of 10 minutes now. If Mr Menon
 17 identifies anything that ought not to be broadcast, or
 18 indeed if anyone else identifies anything that ought not
 19 to be broadcast, they will need to identify that within
 20 that 10-minute period.

21 We'll begin by dealing first with why it is that the
 22 applicant has relevant evidence to give to your inquiry.
 23 On 11 May 2016, following a trial, the applicant was
 24 convicted on a charge of preparing to commit an act of
 25 terrorism and a charge of being concerned in a funding

62

1 arrangement related to terrorism. He was sentenced to
 2 an extended sentence of 9.5 years, comprising 5.5 years'
 3 imprisonment and 4 years on licence. He was released on
 4 licence in November of last year but, as is well known,
 5 has been recalled to prison since.

6 Sir, in opening the inquiry oral evidence hearing on
 7 7, 8 and 9 September of last year, we made reference to
 8 the applicant. The context for what we said was
 9 chapter 13, which addresses the radicalisation of
 10 Salman Abedi, although we should say that we recognise
 11 the force in the submission of the families that the
 12 applicant may also have evidence of relevance to give to
 13 chapter 8, which concerns the planning and preparation
 14 for the attack.

15 In opening we said this:

16 "Considerable efforts are being made to obtain
 17 evidence from the applicant, who Salman Abedi visited in
 18 prison and contacted by telephone on numerous occasions
 19 in the year leading up to the attack and before. We
 20 wish to understand whether he had any role to play in
 21 the development of Salman Abedi's world view or if he
 22 can shed any light on how it was formed. We have no
 23 doubt that the applicant is a witness with important
 24 evidence to give."

25 He was interviewed by the inquiry legal team on

63

1 26 June 2020 but refused to give any answers to our
 2 questions, relying on the privilege against
 3 self-incrimination. We are continuing to pursue this
 4 line of enquiry. As we've said:

5 "The inquiry legal team considers that he may have
 6 evidence of considerable importance to give. We hope
 7 that the applicant will cooperate but in any event
 8 we will press for him to give evidence before this
 9 inquiry."

10 Sir, we went on to explain in our opening statement
 11 how the applicant had been in contact with Salman Abedi
 12 since, at the latest, 24 July 2014. During 2014, the
 13 two conversed about martyrdom, including the martyrdom
 14 of a senior Al Qaeda figure. Salman Abedi visited the
 15 applicant at HMP Belmarsh whilst he was on remand on
 16 26 February 2015. He was then in regular contact with
 17 the applicant whilst he was on bail.

18 Salman Abedi then visited the applicant in prison,
 19 again on 18 January 2017, and was due to visit him again
 20 on 6 March 2017 but did not attend on that occasion.

21 On 17 February of the same year, the applicant was
 22 found to be in possession of an illicit mobile telephone
 23 at HMP Altcourse in Liverpool. Once analysed, that
 24 telephone was found to have been used to make calls and
 25 attempted calls to Salman Abedi's number. In

64

1 consequence, as we said during the course of our
2 opening:

3 "It seems to counsel to the inquiry that
4 Salman Abedi's relationship with the applicant was one
5 of some significance in the period prior to the bombing.
6 We are determined to get to the bottom of it."

7 Sir, expert evidence obtained by the inquiry from
8 Dr Matthew Wilkinson, reader in religion and criminal
9 justice at the University of London, supports the view,
10 held by the inquiry legal team, that the applicant is
11 an important witness. We do not propose to refer to his
12 conclusions today and we do not think it is necessary
13 for anyone else to do so either. However, it is clear
14 that those conclusions serve to underline why the
15 applicant is most certainly a witness with relevant
16 evidence to give.

17 The issue for today is narrow, namely whether you,
18 sir, should accede to an application made by the
19 applicant to prevent disclosure to the inquiry's core
20 participants, including the bereaved families, of two
21 redacted psychiatric reports, namely the report of
22 Dr Richard Latham dated 8 November 2020 and the report
23 of Dr John Kent dated 9 December of the same year.

24 Those two reports form the basis, or at any rate
25 part of the basis, upon which the applicant contends

1 that he is not fit to give evidence, but that is not the
2 issue for determination today, and if time is not to be
3 wasted, all who wish to address you will need to be
4 disciplined in addressing the real issue for today. We
5 repeat, the issue for today is whether disclosure of
6 those two reports should be ordered.

7 On that issue, sir, you have received submissions as
8 follows: submissions on behalf of the applicant, dated
9 26 January, page 2 of the bundle dedicated to this
10 issue; CTI's submissions dated 3 February (inaudible:
11 distorted) nine; further submissions on behalf of the
12 applicant, dated 5 February, page 45; and finally, joint
13 submissions on behalf of the bereaved families, dated
14 9 February, page 49.

15 The position in short is that the inquiry legal team
16 submits that the disclosure of those reports should be
17 ordered to core participants. In that position, we are
18 strongly supported by the families. Moreover, no core
19 participant has suggested that our position is wrong.

20 The argument. The application of the applicant
21 appears to be made on the basis that disclosure to core
22 participants of the reports breaches rights under
23 Articles 2 and/or 3 and/or 8 of the European Convention
24 of Human Rights and/or would breach your obligation,
25 sir, to act with fairness in accordance with

1 section 17.3 of the Inquiries Act 2005.

2 The history of the inquiry's dealings with the
3 applicant's representatives over this issue and the
4 applicable law are set out in extenso in our written
5 submissions and we will not repeat them in this hearing.
6 Instead, sir, we will simply summarise our response on
7 the core points.

8 First, the argument pursued pursuant to Articles 2
9 and 3. The position of the inquiry legal team is that
10 the applicant has not identified any credible argument
11 that his Article 2 and/or 3 rights would be violated by
12 disclosure of the reports; see paragraphs 69 to 71 of
13 our written submissions.

14 It is submitted, as we understand it, on the
15 applicant's behalf that disclosure of the two reports to
16 core participants, even if a restriction order were made
17 by you, sir, preventing reporting, would violate his
18 rights under Articles 2 and 3 because, (1), if disclosed
19 to core participants, they would, as it is put,
20 inevitably make representations in open court seeking to
21 persuade you that the applicant should be compelled to
22 give evidence despite the psychiatric evidence; (2),
23 this would expose the applicant to adverse media
24 publicity because a restriction order, it is suggested,
25 at most "may mitigate the impact of adverse media

1 publicity"; and, (3), there would then be adverse media
2 publicity and, it is said, this has been identified by
3 Dr Latham as a risk factor for self-harm or suicide.

4 Our position is that this submission is
5 misconceived, unsupported by the Article 2 and 3 case
6 law, and that it should be rejected by you, sir. First,
7 it is not certain that core participants will choose to
8 make such submissions. It is a fact that they do not
9 have any idea at the moment whether they will or
10 will not do so because they have not seen the reports.
11 In any event, we have no doubt that you will require
12 submissions in writing when the appropriate stage is
13 reached and, if an oral hearing were needed, you could,
14 if you considered that Article 2 or 3 required it,
15 direct that parts of those written submissions not be
16 referred to in open court.

17 Second, if you considered that reporting would
18 create an Article 2 or 3 risk, you would no doubt make
19 a restriction order which would, contrary to the
20 submission made, wholly mitigate the impact of
21 reporting.

22 Third, were an oral hearing held without
23 a restriction order and the matters discussed were
24 reported, that would in any event only give rise to
25 a violation of Article 2 and/or 3 if it were shown that

1 such reporting would give rise to a real and immediate
2 risk to the applicant's life as defined in the case law,
3 which identifies a stringent and high threshold
4 requiring objective evidence of a substantial or
5 significant (inaudible: distorted).

6 In simple terms, in our submission, the evidence
7 does not support to any material extent, if at all, that
8 contention. So what it comes to, sir, in our submission
9 is that there is nothing in the Article 2 or Article 3
10 point.

11 Article 8. We submit that disclosure would not be
12 an unlawful interference with the applicant's Article 8
13 rights; see paragraphs 72 to 86 of our written
14 submissions. The questions that we suggest arise for
15 your consideration are as follows:

16 First, would disclosure of the reports interfere
17 with the applicant's Article 8 rights? The answer, we
18 acknowledge, is yes, but the severity of that
19 interference should not be overstated for the reasons
20 we've given at paragraph 73.

21 Second, would disclosure be in accordance with the
22 law? Answer: plainly, yes. The reports would be
23 disclosed pursuant to the framework provided by the 2005
24 Act and the 2006 Rules.

25 Third, would disclosure of the reports pursue an

1 objective or objectives that are sufficiently important
2 to justify the limitation of the applicant's Article 8
3 rights? In our submission, disclosing the reports to
4 core participants in their redacted form would pursue
5 a number of legitimate objectives.

6 (1). It would allow core participants, particularly
7 the bereaved families, to understand fully why the
8 applicant's original call date in the inquiry of
9 19 November of last year was vacated and why the inquiry
10 has not currently fixed a further date for the
11 applicant's evidence. That, in our view, will not be
12 achieved by the two-paragraph gist of Dr Latham's report
13 that the applicant has proposed in his written
14 submissions.

15 (2). It would allow core participants, again in
16 particular the bereaved families, to understand the
17 basis for the applicant's submission that he cannot give
18 evidence to the inquiry at all. Understanding why that
19 submission is being made and the underlying merits of it
20 provides a compelling objective given the centrality of
21 the applicant's evidence to the terms of reference.
22 Again, in our view, that will not be achieved by the
23 two-paragraph gist of Dr Latham's report.

24 (3). Most importantly, disclosure of the reports
25 allows core participants to assess and, if appropriate,

1 advance informed submissions to you, sir, on the
2 applicant's assertion that he cannot lawfully be called.
3 The simple fact of the matter is that that cannot be
4 done without sight of the report's contents. No
5 meaningful assessment could be conducted by core
6 participants based solely on the two paragraphs of
7 Dr Latham's report.

8 Fourth in those questions that we suggest you will
9 need to ask and answer, sir: is there a rational
10 connection between disclosing the reports and the
11 inquiry's objectives? Answer: plainly, yes.

12 (5). Could a less intrusive measure be used without
13 unacceptably compromising the achievement of the
14 inquiry's objectives? Answer: no. The inquiry has
15 already in this regard taken a number of steps to ensure
16 that the interference with the applicant's Article 8
17 rights is minimised to the greatest extent possible
18 whilst still allowing the inquiry's objectives to be
19 pursued.

20 The inquiry is proposing to disclose only two
21 redacted expert reports concerning the applicant in
22 circumstances in which it has obtained significantly
23 more material about him, including material on which the
24 applicant has relied in arguing that he cannot be called
25 to give evidence. The inquiry is therefore seeking to

1 provide to core participants only those reports which
2 are considered most relevant. The inquiry is not
3 proposing full disclosure, far from it.

4 Disclosure of the two reports to core participants
5 would, moreover, be subject to a strict confidentiality
6 undertaking and would be made available solely for the
7 purposes of the inquiry. Moreover, the inquiry legal
8 team has applied redactions to remove personal,
9 sensitive and irrelevant content from the reports and
10 the applicant has been invited, indeed on a number of
11 occasions, to identify any further redactions that he
12 considers appropriate. He has not done so.

13 Were any of the private contents of the reports
14 aired in open court, you would be empowered, sir, to
15 make a restriction order preventing the publication and
16 reporting of that information if the section 19 criteria
17 were met.

18 Sixth and finally, balancing the severity of the
19 proposed disclosure on the applicant's Article 8 rights
20 against the importance of the objective, does the
21 former, namely severity, outweigh the latter, namely the
22 importance of the objectives? In the submission of
23 counsel to the inquiry "no" is the answer. The limited
24 interference with the applicant's Article 8 rights would
25 not, and indeed cannot, outweigh the importance of the

1 objectives the inquiry is seeking to achieve. The
2 interference with the applicant's Article 8 rights would
3 therefore be, we submit, both proportionate and lawful,
4 so consideration of the applicant's Article 8 rights
5 does not provide, we suggest, any basis for concluding
6 that disclosure ought not to be made.

7 As for the question of fairness, whether under
8 section 17.3 or indeed at common law, we submit that
9 that adds nothing to the points that we have made
10 already; see paragraphs 87 to 95 of our written
11 submissions.

12 So, sir, in the circumstances, the reports, we
13 suggest, plainly ought to be disclosed.

14 We are going to invite submissions next from
15 advocates in the following order: first of all,
16 Mr Weatherby Queen's Counsel, who has taken the lead on
17 this issue on behalf the families. Then Mr Atkinson
18 Queen's Counsel, then Mr Gozem Queen's Counsel, then
19 Mr Cooper Queen's Counsel. Then, in the unlikely event
20 that any other core participant has a contribution to
21 make, not that we are seeking to discourage such
22 contribution, we will invite that. And then finally
23 subject to any other submissions that we as counsel to
24 the inquiry have to make, we will invite Mr Menon to
25 respond.

1 So first, please, Mr Weatherby.

2 Submissions by MR WEATHERBY

3 MR WEATHERBY: Can you hear and see me, sir?

4 SIR JOHN SAUNDERS: I can, thank you very much,

5 Mr Weatherby.

6 MR WEATHERBY: We have put in joint written submissions,
7 which you have already indicated that you've read, which
8 will allow me to be much swifter than I might be, and
9 also of course you can see from those written
10 submissions that we on this occasion agree with counsel
11 to the inquiry's submissions.

12 It is important to make a series of points, however,
13 and I'll do so swiftly. It's important, firstly, to
14 repeat and underline that this hearing is only to
15 consider the disclosure of redacted medical reports and
16 not the substantive issues that follow from those on the
17 application.

18 The inquiry has determined that Mr Abdallah is
19 a witness who should be called to give evidence and may
20 be able to assist the inquiry. For reasons which will
21 be obvious to you and to everybody who's followed these
22 proceedings, from our opening statements and from the
23 evidence adduced via the senior investigating officer,
24 Mr Barraclough, all of the bereaved families agree with
25 the decision that he is an important witness that ought,

1 if at all possible, be called to give evidence.

2 We have so far on this process been told that there
3 are medical reasons advanced as to why Mr Abdallah
4 should not be required to give evidence in the hearings.
5 Obviously in some circumstances, in all legal
6 jurisdictions, witnesses in whom the tribunal, here the
7 inquiry, would like to hear can't be called, and that's
8 for a variety of reasons. A witness may have died, left
9 the country and be unobtainable, or, as here, may
10 contend that he or she is too unwell or suffers
11 a medical condition which makes it impossible or
12 inappropriate for him or herself so to do.

13 Where, of course, a witness has died or where their
14 whereabouts are unascertainable, the inquiry would have
15 no option in terms of requiring them to appear. But
16 where medical reasons are advanced, the inquiry must
17 consider whether those reasons are real and sufficient
18 to require it to excuse the witness. In some
19 circumstances the evidence from the witness is so
20 uncontroversial or relatively uncontroversial or
21 peripheral that a different witness may be called
22 instead, and in other circumstances the evidence the
23 witness may able to give is so important that the
24 medical evidence must be scrutinised and considered very
25 carefully indeed. In our submission, the current

1 witness falls very much into the latter category.

2 We have been given a summary as to the process
3 that's occurred to date without the participation of the
4 families or of the core participants, no complaint
5 there, but it is apparent that are two important medical
6 reports central to whether there are medical reasons
7 sufficient that Mr Abdallah should be excused. Those,
8 as counsel to the inquiry has indicated, should be
9 disclosed, shorn of irrelevant personal information
10 only, and should be disclosed to the family teams, and
11 obviously these submissions agree with that.

12 It is imperative that the families are able to
13 effectively participate in important decisions within
14 the inquiry. That is a central part of their Article 2
15 rights as the bereaved.

16 The families are simply unable to take any
17 meaningful part in the arguments as to whether
18 Mr Abdallah should be excused from giving evidence for
19 medical reasons if they don't have those medical
20 reports.

21 Whatever the arguments as to whether Mr Abdallah
22 should or should not be called to give evidence, and
23 whether those are based upon his Article 2 or Article 3
24 or Article 8 rights, it's difficult to see how those
25 arise or could prevail on the disclosure aspect.

1 Disclosure is secure, the families are subject to robust
 2 undertakings not to publish any material which comes to
 3 them via the inquiry disclosure process. There has been
 4 no violation of the undertakings. All families are no
 5 doubt mindful of the undertaking requirement, being
 6 fully advised. Given that process, it's difficult to
 7 see how disclosure for the purposes of the families
 8 being able to take part in the inquiry decision—making
 9 on such an important decision would engage Article 2 or
 10 Article 3.

11 With respect to the Article 8 issue, any balancing
 12 act that arises must come down, in our submission,
 13 resoundingly on the side of disclosure to the families,
 14 given the very limited interference with privacy
 15 involved, given the procedural safeguards in place and
 16 given the clear and important interests of the bereaved,
 17 which are the legitimate objective within the
 18 proportionality balance.

19 Until the families see the wording of the reports,
 20 what the doctors were provided with, whether the
 21 information was correct and complete, then it is
 22 impossible for the families to make meaningful
 23 submissions. In the application, the point is made at
 24 paragraph 2(c) that in the absence of other psychiatric
 25 evidence to the contrary, the inquiry could not reach

1 and no core participant could submit a contrary view.
 2 Expert evidence is just that. It doesn't have to be
 3 accepted. There may be points to be put to the experts
 4 that would change their views or points that they've
 5 accepted, which might require correction or points which
 6 might require clarification or further work. Cases
 7 where important witnesses are or should be excused for
 8 psychiatric reasons are rare. It may be necessary to
 9 seek further evidence once reports have been seen.

10 Other Article 2 proceedings have been raised in the
 11 written argument. The reference to Hillsborough is in
 12 error. In fact, in those proceedings, a very similar
 13 process was agreed and implemented to that which the
 14 inquiry team in this inquiry has proposed. Medical
 15 reports on witnesses were disclosed. We expect this
 16 doesn't remain in issue, but if it does we'll seek
 17 a waiver of the undertaking in that process and provide
 18 the documents.

19 SIR JOHN SAUNDERS: Do you mind if I interrupt you? We have
 20 had anecdotal evidence on a number of occasions about
 21 what other inquiries have done or not done. There
 22 appears on the face of documents to be considerable
 23 dispute arising in this case as to what was done by
 24 various inquiries. Each of them is governed by its own
 25 facts. In the absence of some written reasoned judgment

1 or ruling by an inquiry chairman, all of whom are
 2 extremely distinguished, but in the absence of that
 3 it is difficult for me to actually take much account of
 4 what other inquiries have done unless you wish me to do
 5 so.

6 As I understand what you're saying, you're really
 7 combating the argument put forward by Mr Menon rather
 8 than relying on them yourself. But I can tell you now,
 9 I'll come back to you if I need to, but I'm very
 10 reluctant to rely on, I'm not suggesting inaccurate, but
 11 disputed anecdotal evidence of what other inquiries do,
 12 which are very much on their own facts.

13 MR WEATHERBY: That's a very helpful indication, I'll move
 14 swiftly on. You're right that I am simply trying to
 15 meet an argument that had been raised that in our
 16 submission wasn't in fact quite right. We were going to
 17 round off this part of the submission by pointing out
 18 that we're unaware of any ruling in any other proceeding
 19 which would in fact support the proposition that was
 20 being put forward, but I'll move swiftly on.

21 The application notes that if the reports are
 22 disclosed, substantive submissions may follow. That
 23 of course is correct. That process will be protected by
 24 two things: responsible advocacy on the one hand, one
 25 hopes, and your case management and powers under

1 section 19 on the other.

2 We also note that the facts related to Mr Abdallah
 3 have been widely aired in public already and reported,
 4 albeit obviously not the medical and personal facts,
 5 which may come to light from these reports. But to the
 6 extent that the fears relate to that material, the horse
 7 has well and truly bolted.

8 Finally, can I refer to the importance of
 9 Mr Abdallah's evidence, because it is relevant, we
 10 submit, to this issue. This is not a witness whose
 11 evidence can be replaced by that of another. It's not
 12 so peripheral that the inquiry need not be concerned if
 13 Mr Abdallah cannot be called. This is evidence which
 14 goes to the heart of some key matters: radicalisation
 15 has been referred to and whether the plot went further
 16 than the Abedi brothers themselves. Those are matters
 17 that we've raised and indeed the inquiry's expert
 18 referred to earlier has also raised.

19 In those circumstances, the inquiry must, in our
 20 submission, make every reasonable effort to call him to
 21 give evidence and it must involve the families in that
 22 process. It must seek their assistance and facilitate
 23 their effective participation.

24 Finally, this: the issue of the fitness of each
 25 witness to give evidence is a matter which must be

1 determined upon its own facts and evidence. However, as
 2 stated in the last paragraph of our written submission,
 3 with respect to those closest to Salman Abedi, the
 4 inquiry has determined to call two witnesses,
 5 Mr Abdallah and Mr Taghdi. As we understand it, both
 6 are advancing medical reasons why they should not be
 7 called. Other witnesses who might have been called are
 8 beyond the jurisdiction: Ramadan Abedi, Mr Soliman,
 9 Mr Elmehdi amongst them.

10 Yes, the issue of whether Mr Abdallah is fit to give
 11 evidence must be determined upon its own facts and
 12 evidence, but the inquiry must not lose sight of the
 13 process and the real concerns of the families that some
 14 witnesses are trying to put themselves out of reach of
 15 the important questions that the inquiry has for them
 16 and that is why involving them in the process is an
 17 imperative.

18 Unless I can assist further, those are our
 19 submissions.

20 SIR JOHN SAUNDERS: Thank you very much, Mr Weatherby.
 21 MR GREANEY: We had appreciated that the submissions were
 22 joint submissions on behalf of the families.
 23 Nonetheless, as a matter of courtesy, we'll ask
 24 Mr Atkinson if he has anything that he wishes to add.
 25 MR ATKINSON: No, thank you, I endorse all that Mr Weatherby

81

1 has just said.

2 SIR JOHN SAUNDERS: Thank you, Mr Atkinson.
 3 MR GREANEY: Mr Gozem has communicated to me, sir, that he
 4 entirely endorses what Mr Weatherby has said and has
 5 nothing to add. So I'll ask Mr Cooper whether he's
 6 in the same position or wishes to say anything
 7 additional.

8 Submissions by MR COOPER

9 MR COOPER: I have very little in addition. We endorse the
 10 submissions not only made by Mr Weatherby but also on
 11 behalf of CTI and would simply ask this: this would not
 12 be the first time you, sir, within this hearing have had
 13 to consider issues relating to competency to give
 14 evidence. You'll remember on a previous occasion
 15 expertise was called as to a similar sort of matter and
 16 that expert was handled within this hearing, as one
 17 would hope, with competency and diligence, indicating
 18 that this inquiry is well-versed in dealing with issues
 19 such as this. It has already dealt with one such issue.
 20 Apart from that, those are our submissions.

21 SIR JOHN SAUNDERS: Thank you, Mr Cooper.
 22 MR GREANEY: Sir, I'm just going to check whether
 23 Mr De Simone of the BBC has anything he wishes to say
 24 about the issues we've been addressing so far. It may
 25 be that his submissions will come later. I just give

82

1 him a few seconds.

2 Submissions by THE PRESS

3 MR DE SIMONE: Thank you, Mr Greaney, and thank you
 4 Mr Chairman.

5 Just a small point, really. Not so much with today,
 6 which has been an open hearing, but just on the point
 7 about Article 10, because there's been a lot of talk
 8 about other articles. We would just say that given the
 9 importance of Mr Abdallah as a witness, and that's been
 10 spoken about multiple times now, that when the time
 11 comes to determine the issue about whether he's to be
 12 called, that we would just submit that there is a clear
 13 Article 10 interest in that being determined with us,
 14 the press on behalf of the public, being present and
 15 being able to hear that.

16 I just wanted to make that point: that this is a big
 17 public interest issue, his evidence and whether he is
 18 going to be called or not.

19 SIR JOHN SAUNDERS: Thank you very much for that. There
 20 will obviously be opportunities at the appropriate time
 21 to raise questions of Article 10, particularly when they
 22 can be in conflict with Article 8. So yes, certainly.
 23 I think that doesn't come to be decided until I decide
 24 the initial point about whether there should be
 25 disclosure to CPs in the first place.

83

1 MR GREANEY: Sir, you're entirely correct. The reason that
 2 Article 10 has not been referred to so far in the
 3 submissions today is that each of those who has
 4 addressed you has been responding to submissions founded
 5 in Articles 2, 3 and 8, but I'm certain that no one will
 6 have lost sight of the importance of Article 10.

7 I am just going to pause for a moment in order to
 8 see whether any of the organisational core participants
 9 have anything they want to contribute to the
 10 jurisprudence of the European Court.

11 (Pause)

12 No one seems to be wanting to say anything. I'm
 13 therefore going to turn to Mr Menon to develop his
 14 submissions, sir.

15 SIR JOHN SAUNDERS: Thank you.

16 Submissions by MR MENON

17 MR MENON: Can I confirm, sir, that you can see and hear me?
 18 SIR JOHN SAUNDERS: I can do both, thank you very much.
 19 MR MENON: Thank you.

20 Sir, you've already indicated that you have read our
 21 submissions, our initial submissions, dated 26 January
 22 and our further submissions dated 5 February, in which
 23 we have set out our arguments on behalf of the
 24 applicant, Abdalraouf Abdallah, in some detail.
 25 I intend to be brief this afternoon as repetition of

84

1 what we have already submitted in writing is not going
2 to assist you or improve our arguments.

3 However, in response to the written and oral
4 submissions of counsel to the inquiry and the bereaved
5 families, we need to put the issue before the inquiry
6 this afternoon, namely the disclosure of the two
7 psychiatric reports by Dr Latham and Dr Kent, into
8 context and reiterate, at least in summary form, why we
9 so strongly object to what counsel to the inquiry is
10 proposing.

11 Can I start by correcting an apparent misconception?
12 We are not submitting that disclosure of the psychiatric
13 reports in and of itself breaches Mr Abdallah's
14 Article 2 and 3 rights. In our original submissions we
15 put it on an entirely different basis and the only
16 reference to Articles 2 and 3 in our original
17 submissions was in the context of the potential impact
18 that adverse press publicity would have in respect of
19 this issue on those particular rights.

20 I repeat, for the avoidance of doubt, we are not
21 submitting that the disclosure of this evidence in and
22 of itself would breach Mr Abdallah's Article 2 and 3
23 rights. I hope I've dealt with that.

24 Can I now move on briefly to the relevant
25 chronology. It was in an email to Mr Abdallah's

85

1 solicitor on 14 May last year that Mr Abdallah was
2 informed that the inquiry wished to interview him and
3 obtain a statement from him. Following a series of
4 further emails between solicitor to the inquiry and
5 Mr Abdallah's solicitor and the no-comment interview of
6 Mr Abdallah that Mr Greaney has referred to on 26 June,
7 Thalia Maragh and I set out Mr Abdallah's position in
8 detail in submissions dated 24 July of last year. We
9 drafted those submissions in the mistaken belief that
10 they would be provided to all the core participants,
11 particularly the bereaved families. We did not formally
12 ask that they be disclosed, we wrongly assumed that they
13 would be disclosed, and we remain of the view that they
14 should be disclosed so that our overriding position is
15 clear to all concerned.

16 In those submissions, we made two key points.

17 (1). That Mr Abdallah would not be answering the
18 inquiry's questions, not because he had any direct or
19 indirect involvement in the terrorist attack at the
20 Manchester Arena or any prior knowledge or suspicion
21 that such an atrocity was being planned or contemplated;
22 on the contrary he was not involved in any way and had
23 no prior knowledge or suspicion. He heard about the
24 attack for the very first time in prison, after it had
25 occurred and after it had been reported by the press.

86

1 The reason that Mr Abdallah would not be answering
2 the inquiry's questions, as we set out in those
3 submissions, was because he had no faith that he would
4 be treated fairly and properly were he to cooperate and
5 tell the truth. I add now, so that it is absolutely
6 clear, that Mr Abdallah has been legally advised in the
7 strongest possible terms that he should exercise his
8 right to silence for all the reasons set out in those
9 July 2020 written submissions.

10 SIR JOHN SAUNDERS: Mr Menon, please forgive me for
11 interrupting you for a moment. I have of course read
12 those submissions and certainly if it comes that we need
13 to argue those matters, it read slightly oddly that
14 whilst setting out that Mr Abdallah had absolutely
15 nothing to do with anything to do with this attack, so
16 that he had nothing to hide in relation to it, that
17 nevertheless he wasn't going to answer any questions
18 because he might incriminate himself. I found that
19 a bit odd.

20 MR MENON: I'm happy, sir, to address that, although perhaps
21 the time to address it would be if in due course, at
22 a later stage, prior to the conclusion of this inquiry,
23 Mr Abdallah were deemed fit on psychiatric evidence and
24 there were to be a further application that he be
25 compelled to attend and give evidence.

87

1 SIR JOHN SAUNDERS: I'm perfectly happy to leave it until
2 then, but as you mentioned it and set that out,
3 I thought I would raise that query.

4 MR MENON: I'm grateful for that indication and I'm happy to
5 develop that argument perhaps when the submissions are
6 served on all the core participants and they've had
7 sight on them.

8 SIR JOHN SAUNDERS: Thank you.

9 MR MENON: I'm not ducking the issue. That's the main point
10 I am seeking to make.

11 The second point, sir, that was central to those
12 July submissions was the contention that we made that
13 compelling Mr Abdallah to answer the inquiry's questions
14 would be incompatible with his Convention rights under
15 Articles 2, 3 and 8 in light of his psychological
16 history and fragile mental state.

17 Notwithstanding those submissions, as CTI's
18 submissions make clear, the inquiry persisted in trying
19 to compel Mr Abdallah to give evidence. However, as
20 a result of concerns that we raised, I think it was in
21 September or October last year, that compelling
22 Mr Abdallah to give evidence would likely increase the
23 risk of self-harm and possibly suicide, the inquiry
24 instructed Dr Latham, a leading consultant forensic
25 psychiatrist, to interview Mr Abdallah and prepare

88

1 a report on his mental state.
 2 As we have indicated in summary form in our
 3 submission, in that report Dr Latham concluded that
 4 Mr Abdallah was unfit to give evidence and that
 5 requiring him to give evidence would be harmful to his
 6 mental health and increase the risk of suicide.
 7 Despite Dr Latham's unequivocal conclusions, the
 8 inquiry instructed Dr Kent, another consultant forensic
 9 psychiatrist, to peer review Dr Latham's findings. We
 10 accept that Dr Kent's report has its limitations as he
 11 did not interview Mr Abdallah. Nevertheless, it is
 12 important to note that there is nothing in his report
 13 that contradicts Dr Latham's findings.
 14 In short, the position is that there is no competing
 15 psychiatric opinion at this moment. Dr Latham's opinion
 16 is uncontested and unchallenged, and I repeat, because
 17 this is so important, he was instructed by the inquiry
 18 and not by Mr Abdallah.
 19 SIR JOHN SAUNDERS: Mr Menon, I'm sorry to interrupt you,
 20 but I think it's not actually how I understand the
 21 situation to have arisen. The inquiry certainly
 22 intended, in view of what had been said, to instruct
 23 a psychiatrist. It proposed that Dr Kent should
 24 interview and make a report, prepare a report on
 25 Mr Abdallah. Your solicitors refused to allow Dr Kent

1 to examine him and proposed an alternative and said
 2 Mr Abdallah would not be examined by Dr Kent. Your
 3 solicitors suggested Dr Latham, I immediately say a very
 4 respective and highly experienced consultant
 5 psychiatrist. He prepared a report. It was indicated
 6 beforehand that the inquiry would wish it to be peer
 7 reviewed by Dr Kent or for Dr Kent to do his own report.
 8 Your solicitors, or your client, refused to allow
 9 Dr Kent to do his own examination, so he has only been
 10 able to produce a report on the basis of what Dr Latham
 11 produced.
 12 I just think that may be a more accurate summary of
 13 what happened than you have already said.
 14 MR GREANEY: Sir, that's entirely accurate, if I might just
 15 interrupt for one moment.
 16 SIR JOHN SAUNDERS: Thank you, Mr Greaney.
 17 MR MENON: Sir, in an email to the solicitor to the inquiry
 18 on 25 November, Mr Abdallah's solicitor,
 19 Sally Middleton, set out in detail what had arisen when
 20 Dr Kent, who at that stage was conducting the peer
 21 review, asked for a video attendance with Mr Abdallah.
 22 I'm not going to repeat what's in that email, again
 23 we are content for the contents of that email to be
 24 explained to all concerned, but a detailed explanation
 25 was given in that email for what had happened on the

1 particular day when Dr Kent sought to interview
 2 Mr Abdallah by video.
 3 In relation to the initial point that you made,
 4 in relation to the instruction of Dr Latham, again my
 5 instructing solicitor set out in detail in writing to
 6 the solicitor to the inquiry our concerns in relation to
 7 Dr Kent and in relation to the particular psychiatric
 8 conditions that Mr Abdallah was -- we knew at the
 9 time -- suffering from. It was in that context that we
 10 recommended Dr Latham and the inquiry, in our respectful
 11 submission, properly accepted that recommendation and
 12 chose to instruct Dr Latham itself.
 13 So I'm not sure if it's being suggested that the
 14 fact that we recommended Dr Latham in some way
 15 undermines the conclusions that he's reached. I hope
 16 that's not being suggested.
 17 SIR JOHN SAUNDERS: Mr Menon, it is absolutely not. That is
 18 why I indicated that he was a very respectable and
 19 experienced doctor. However, I think Ms Middleton went
 20 slightly further in her letter and said that Mr Abdallah
 21 would not agree to being interviewed and examined
 22 personally by Dr Kent. So it wasn't, "We think it would
 23 be better if you have Dr Latham, he's rather better at
 24 this sort of thing"; it was, "We will not allow an
 25 examination of Dr Kent but we would allow it by

1 Dr Latham".
 2 MR MENON: Well, I'm not entirely sure, sir. Even if one
 3 accepts that summary in its entirety, I'm not entirely
 4 sure how that impacts on, as Mr Greaney calls it, the
 5 narrow issue before you today as to whether these
 6 reports should be served in their entirety -- with
 7 suitable redactions, of course -- on the core
 8 participants to the inquiry. If it does, then I'm happy
 9 to address the point.
 10 SIR JOHN SAUNDERS: Mr Menon, it doesn't. I was just
 11 concerned that your summary of the position may not have
 12 been -- I'm not saying not accurate, but it was
 13 certainly lacking in some detail which is quite
 14 important to understand how it came about.
 15 MR MENON: I understand. Unless you wish to hear from me
 16 further on that point, I'm just going to continue with
 17 what I was proposing to say as far as the application is
 18 concerned.
 19 SIR JOHN SAUNDERS: Thank you. Please do.
 20 MR MENON: Can I turn then to the two psychiatric reports of
 21 Dr Latham and Dr Kent and whether they should be
 22 disclosed to all core participants with, of course,
 23 irrelevant personal information removed, as is proposed
 24 by counsel to the inquiry, or whether only a gist of
 25 their conclusions should be disclosed, as we propose.

1 We understand, of course, why the families want
 2 disclosure of the two reports. Indeed, we understand
 3 why the families, despite not yet having received
 4 anything, are already asking for more, namely what they
 5 call "other relevant supporting documents", and even
 6 documents in fact that were never provided to Dr Latham
 7 and Dr Kent and are therefore irrelevant to their expert
 8 conclusions.

9 I'm afraid that that is entirely predictable in the
 10 circumstances and is indicative of precisely why we
 11 submit that the inquiry should disclose no more than
 12 a gist and not allow this to become a fishing expedition
 13 through Mr Abdallah's irrelevant medical and personal
 14 history.

15 It will come as no surprise to anybody that
 16 Mr Abdallah is extremely concerned about highly personal
 17 and private information about his background and his
 18 medical history being distributed to all the core
 19 participants, in other words, as we understand it, to
 20 several hundreds of people, even if that information
 21 were to be subject to a restriction order and therefore
 22 incapable of reporting by the media.

23 Additionally, of the many reasons that we have set
 24 out in writing as to why those reports should not be
 25 disclosed, there are two in particular, in our

1 submission, that we wish to highlight today because they
 2 are, in our submission, the most important.

3 Firstly, on the ultimate issue of whether
 4 Mr Abdallah should be compelled to give evidence, which
 5 we accept is not being determined today, there is in our
 6 submission no informed submission that any core
 7 participant could advance that could conceivably
 8 persuade you, sir, to compel a vulnerable, unfit witness
 9 to give evidence in the absence of any contrary
 10 psychiatric evidence.

11 A ruling that compelled an unfit witness to give
 12 evidence would be unprecedented and unlawful. That's
 13 the reason why, with all due respect, we submitted in
 14 our further submissions that the submission at
 15 paragraph 80 of CTI's submission is fanciful. We note,
 16 additionally, rule 12(4)(a) of the Inquiries Rules 2006,
 17 where it is stated that:

18 "One of the conditions that must be satisfied before
 19 potentially restricted evidence is disclosed to core
 20 participants is that the chair of the inquiry must be
 21 satisfied that such disclosure is necessary for the
 22 determination of the application."

23 Our simple submission on this point is that
 24 disclosure is not necessary for the determination of the
 25 ultimate application as to whether or not Mr Abdallah

1 should be compelled to give evidence for the reasons
 2 that we have already advanced, that there is nothing
 3 that could possibly be said that could compel you to
 4 order an unfit witness to be required to give evidence.
 5 So that's the first key point that we wish to make.

6 The second is that in deciding what is fair,
 7 pursuant to section 17(3) of the Inquiries Act 2005,
 8 when it comes to the treatment of a witness who is unfit
 9 to give evidence, there is no balancing exercise or
 10 proportionality test to apply. There are no competing
 11 interests which you will have to take into account in
 12 due course when deciding whether or not he should be
 13 compelled to give evidence. Of course the families have
 14 the undoubted right to participate effectively in the
 15 inquiry pursuant to the Article 2 procedural duty, but
 16 that right cannot, in the exercise of a fairness
 17 balancing exercise, ever trump the rights of a witness
 18 who is not only unfit to give evidence but is also at an
 19 increased risk of self-harm and suicide if he were
 20 compelled to give evidence from having his Convention
 21 rights ignored or undermined.

22 We have mentioned the recent judgment in the case of
 23 D and F v Persons Unknown at paragraph 6 of our further
 24 submissions, which is at page 46 of the bundle. We
 25 acknowledge from the outset that this is a very

1 different case. However, it is an example of how the
 2 High Court has approached uncontroverted expert evidence
 3 that there is a real and immediate risk of serious
 4 physical harm or death — in that case, in the context
 5 of lifetime anonymity orders — and held in that context
 6 that there was no balancing exercise to perform in such
 7 circumstances.

8 That is the principal point that we're seeking to
 9 make. What is the end result of this process given the
 10 unequivocal conclusions of Dr Latham? We repeat, there
 11 is nothing that anybody could say to you, in our
 12 respectful submission, that could persuade you to compel
 13 an unfit witness to give evidence at a public inquiry.

14 For the avoidance of doubt, we are not saying, as is
 15 suggested at paragraphs 81(a) and 81(b) of CTI's
 16 submissions, we are not saying that the core
 17 participants may not have something of value to say on
 18 the current state of the expert evidence. Of course
 19 they may have something of value to say, but that is not
 20 the test for disclosure in an inquiry. And of course
 21 we are not saying that expert evidence is fixed and
 22 incapable of change.

23 If in the months ahead there were to be fresh expert
 24 evidence before you, sir, to the effect that Mr Abdallah
 25 was fit and there was no real and immediate risk of

1 serious physical self –harm or suicide if he were
 2 compelled to give evidence, of course the inquiry would
 3 be entitled to review the matter. But that cannot
 4 justify at this particular juncture, in our respectful
 5 submission, disclosing the two psychiatric reports to
 6 all core participants.
 7 Finally, we reject the contention at paragraph 82(d)
 8 of CTI’s submissions that there is anything opaque or
 9 detached about what we are proposing in terms of
 10 disclosing no more than a gist of the psychiatric
 11 conclusions to the core participants. Our primary
 12 concern on behalf of the applicant, Mr Abdallah, is that
 13 he is not treated, and I use these words advisedly, by
 14 the inquiry as some sort of sacrificial lamb.
 15 I make it absolutely clear on his behalf again: he
 16 did not groom or radicalise Salman Abedi. He had no
 17 involvement whatsoever in the planning or preparation of
 18 the terrorist attack on the Manchester Arena. He is
 19 unfit at present to give evidence and, in our respectful
 20 submission, that should be the end of the matter for the
 21 time being unless there is a material change in
 22 circumstances and, in particular, a material change
 23 in the psychiatric opinion of the experts instructed by
 24 the inquiry.
 25 Sir, unless I can assist any further, those are our

1 submissions in summary form.
 2 SIR JOHN SAUNDERS: Well, you can assist on one matter if
 3 you wouldn’t mind. You referred me helpfully to the
 4 case of D and F, which I had not read prior to you
 5 referring it to me, so I am grateful.
 6 In that case, two juveniles were seeking from the
 7 High Court to have lifetime anonymity because of their
 8 psychiatric conditions, which were serious. The
 9 application was opposed or representations were made by
 10 the press. For the purpose of making those
 11 representations, Mrs Justice Tipples provided copies,
 12 provided the medical reports, to the press in order that
 13 they could consider them to see whether they wanted to
 14 make representations about them and in order for them to
 15 conduct their argument. They decided, the press, in
 16 view of the contents of those reports, having had the
 17 opportunity to read them, that they would not contest
 18 the contents of those reports in any way. Where is the
 19 distinction between the families being allowed to read
 20 these reports to make up their own minds as to whether
 21 to contest your contention? Where is the distinction in
 22 law to be drawn?
 23 MR MENON: Well, it’s not that there’s a distinction in law,
 24 sir, but the families would be in an equivalent
 25 position, in our respectful submission, if they were

1 given the gist of the conclusions of Dr Latham and
 2 Dr Kent, because ultimately the central conclusion that
 3 Dr Latham reaches in having concluded that Mr Abdallah
 4 is at present, or at the time that he interviewed
 5 Mr Abdallah, unfit to give evidence, it was because
 6 he was satisfied on the material that he had available
 7 to him, the medical material that he had available to
 8 him, that compelling Mr Abdallah to give evidence would
 9 have a detrimental impact on his mental health and
 10 increase the risk of suicide, which is exactly the
 11 position that arose in the D and F case on the
 12 uncontroversial evidence.
 13 SIR JOHN SAUNDERS: In order to allow the press to see the
 14 way in which the psychiatrists in that case reached
 15 their conclusions they were entitled to see, and did
 16 see, the reports. They were able to see the material on
 17 which the psychiatrist made his ruling, his decision,
 18 they were able to see the way he reasoned, the basis for
 19 it. Just seeing a gist does not allow anyone to really
 20 fully understand on what material and for what reasons
 21 that conclusion has been drawn. It simply comes to the
 22 conclusions. So why is it different in this case?
 23 MR MENON: I take the point, sir, that if one relies on the
 24 authority of D and F as a justification for the
 25 disclosure of psychiatric reports to a party, then

1 I can’t address that, obviously. I accept that. But
 2 the fundamental difference, in my respectful submission,
 3 between that case and our situation is the point that
 4 I’m — the key point that I’m making, which is: I, on
 5 a careful and further reading of these two reports, can
 6 identify nothing in those reports — and I welcome
 7 contradiction by Mr Greaney or by you if I’ve got that
 8 wrong — but there is nothing in either of those reports
 9 that could be deployed by counsel for the families to
 10 persuade you to call an unfit witness.
 11 Yes, they would be able to say to you, and quite
 12 frankly there’s no need for disclosure to say that, you
 13 should have Mr Abdallah re—interviewed and re—examined
 14 closer to the time when the inquiry might be minded to
 15 call him to give evidence. We accept that of course.
 16 But they don’t need to see the reports to say that.
 17 There is nothing in those reports that could persuade
 18 you to call an unfit witness and I think that is the
 19 difference on the facts between the instant case and the
 20 D and F case. I was of course relying on D and F on
 21 a different point, namely to highlight the fact that
 22 there is no balancing exercise to perform once the court
 23 is satisfied that Article 2 and/or Article 3 is engaged.
 24 That’s what I was relying on it for. But I take the
 25 point that you’re making that the press were given the

1 reports in that case and I can't sensibly say anything
 2 to contradict that, so I don't.
 3 SIR JOHN SAUNDERS: Okay. Thank you, Mr Menon. I'm
 4 grateful for your submissions, thank you very much
 5 indeed.
 6 MR MENON: Thank you, sir.
 7 SIR JOHN SAUNDERS: Mr Greaney.
 8 MR GREANEY: Sir, I understand that the press may have one
 9 short additional point that they wish to make. We'd
 10 invite Mr De Simone to make that point at this stage in
 11 case Mr Menon has anything he wishes to say about it.
 12 SIR JOHN SAUNDERS: Yes, please. Thank you, Mr De Simone.
 13 Further submissions by THE PRESS
 14 MR DE SIMONE: It's just a brief point. My colleagues
 15 in the media are also watching and have fed in a couple
 16 of comments, which is why I wanted to come in again.
 17 We only received the written submissions around
 18 20 minutes (inaudible: distorted) had that time to go
 19 through them as the hearing's been going on. We were
 20 not aware until we read them that the concept of adverse
 21 media publicity was being discussed and advanced as
 22 a reason for disclosure not to happen. We just wanted
 23 to make the point that if and when there is a further
 24 hearing to deal with Mr Abdallah and whether he is
 25 called, we would have submissions to make on that point.

101

1 We don't necessarily accept the characterisation.
 2 SIR JOHN SAUNDERS: I think that is an extension of the
 3 Article 10/Article 8 point and we will certainly have
 4 that in mind. If it comes to that hearing, which
 5 depends on my ruling now, if the press wish to be
 6 represented, of course I'm perfectly happy for that to
 7 happen. But equally happy for one of you to do it
 8 instead. Thank you.
 9 Mr Greaney.
 10 Submissions in reply by MR GREANEY
 11 MR GREANEY: Sir, thank you very much. There are five very
 12 short points that we would wish to make by way of reply
 13 and then I believe that Mr Nicholls would like to follow
 14 on to make a point of his own. That's in accordance
 15 with your views as to what is helpful.
 16 The five points that we would like to make are as
 17 follows. First, the principal argument that appears to
 18 be deployed on behalf of the applicant was summarised in
 19 one particular phrase that Mr Menon used, namely that
 20 nothing anyone could say to you could make any
 21 difference. So the argument appears to be that the core
 22 participants could not advance any argument or pose any
 23 question that would assist your determination on the
 24 ultimate issue, as it was described, of whether the
 25 applicant ought to give evidence. We simply submit that

102

1 that cannot be correct and substantially understates the
 2 ingenuity of those who are involved in this inquiry.
 3 Secondly, part of the argument, as we understood it,
 4 was that if you order disclosure of these two reports it
 5 may provoke the core participants to seek disclosure of
 6 other materials, to which we respond that that of course
 7 may be correct, further applications for disclosure may
 8 be made, but of course you will subject those
 9 applications to the degree of scrutiny that you are
 10 subjecting this application and in considering it
 11 you will apply and consider the Article 2/3/8 rights of
 12 the applicant.
 13 Thirdly, your understanding, sir, of the chronology
 14 is entirely correct. In particular, when you have
 15 regard to the chronology, we would invite you to
 16 consider the letter of the applicant's solicitor to the
 17 solicitor to the inquiry or her email of
 18 29 October 2020, timed at 14.22 hours, where she says:
 19 "I have spoken to my client, namely the applicant,
 20 this morning, and he will not consent to being assessed
 21 by Dr Kent because he cannot trust a psychiatrist who
 22 has been solely chosen and instructed by yourselves. He
 23 will only consent to being assessed by someone who
 24 we have both agreed to (inaudible: distorted) Dr Kent
 25 and it is unclear that he has any particular specialism

103

1 in assessing (inaudible: distorted) trauma related to
 2 PTSD [which was certainly not correct]."
 3 SIR JOHN SAUNDERS: Mr Greaney, you're flapping a bit of
 4 paper across your microphone, which is making you
 5 difficult to hear.
 6 MR GREANEY: I'm sorry, sir, I'm trying to look at various
 7 screens and pieces of paper. I was drawing your
 8 attention to an email of 29 October timed at
 9 14.22 hours, from the applicant's solicitor to Mr Suter,
 10 which confirms your recollection. I will read it out
 11 again in case you didn't pick up any part of it:
 12 "I have spoken to my client this morning and he will
 13 not consent to being assessed by Dr Kent because he
 14 cannot trust a psychiatrist who has been solely chosen
 15 and instructed by yourselves. He will only consent to
 16 being assessed by someone who we have both agreed to.
 17 I am afraid I do not know Dr Kent [and the solicitor
 18 then raised an issue as to his expertise which was not
 19 with foundation]. While I appreciate the difficulty in
 20 finding a psychiatrist who can assess Mr Abdallah in the
 21 time available, I do think that finding a psychiatrist
 22 that we both agree on is the only way in which my client
 23 will consent to this."
 24 And then, sir, as you recalled:
 25 "I would suggest Richard Latham, who is an extremely

104

1 experienced psychiatrist with relevant experience of
 2 assessing prisoners. I have his contact details if you
 3 would like to take that forward.”
 4 So that is how Dr Latham came into the picture.
 5 Fourthly, sir, reference has been made to the
 6 submissions made on behalf of the applicant dated
 7 24 July and we can confirm that when we reach the stage
 8 of considering the privilege against self-incrimination
 9 arguments that have been advanced on behalf of the
 10 applicant, those submissions will be disclosed to core
 11 participants.
 12 Then fifthly, it may be that we entirely
 13 misunderstood Mr Menon, in which case it will be our
 14 fault, but so that there is no doubt, when you consider
 15 the Article 8 arguments which have been deployed, there
 16 is no doubt that you are concerned with a balancing
 17 exercise and the balance, as we have submitted already,
 18 is between, on the one hand, the severity of the
 19 proposed disclosure on the applicant’s Article 8 rights
 20 against, on the other hand, the importance of the
 21 objectives. We submit that very clearly the importance
 22 of the objectives far outweighs the severity.
 23 Sir, we’ll turn next to permit Mr Nicholls to
 24 develop the point he wishes to develop.
 25

1 Submissions by MR NICHOLLS
 2 MR NICHOLLS: Sir, can I ask whether you can see and hear
 3 me?
 4 SIR JOHN SAUNDERS: I can, yes.
 5 MR NICHOLLS: I’m grateful to Mr Greaney. A matter arose
 6 very shortly toward the end of Mr Menon’s submissions
 7 which I have relayed to Mr Greaney, but in the interests
 8 of speed and expediency, it was felt best that in the
 9 hope of assisting you with one point that Mr Menon
 10 raised I would address it directly. I hope that’s an
 11 acceptable course.
 12 SIR JOHN SAUNDERS: It is.
 13 MR NICHOLLS: You’ll recall, sir, and I’ll be brief, that
 14 Mr Menon relied on rule 12(4) of the 2006 Rules in his
 15 oral submission towards the end of his submissions, and
 16 in summary the argument was, as we understand it, that
 17 the expert reports are potentially restricted evidence
 18 defined in rule 12(1)(a) of the Rules and disclosure of
 19 the reports to core participants is not necessary under
 20 rule 12(4)(a) of the 2006 Rules and they therefore
 21 should not be disclosed.
 22 That argument has not been made in the various
 23 written submissions that have been provided, it was made
 24 for the first time in oral submissions. No concern
 25 about that, sir, but I therefore felt that it may be of

1 assistance to address you on the terms of the rule 12
 2 and section 19 as they relate to the submission that
 3 Mr Menon has made.
 4 In my submission, sir, that submission advanced by
 5 Mr Menon unfortunately misunderstands rule 12 and its
 6 relationship with section 19 as it relates to this
 7 application. That is for the following reasons:
 8 rule 12, as is apparent from those who have it in front
 9 of them — sir, I believe that you may not, but
 10 of course you’ll have the opportunity to review it in
 11 due course. Rule 12 concerns what is defined in the
 12 rules as “potentially restricted evidence”.
 13 “Potentially restricted evidence” is defined in the
 14 rules at rule 12(1)(b). I won’t go into the details of
 15 every aspect of what that includes, but the definition
 16 includes material that is subject to an application for
 17 a restriction order under section 19(2), where the
 18 restriction order is made by you, sir, the chairman. It
 19 also includes other definitions including material that
 20 is proposed to be withheld on grounds of public interest
 21 immunity, which do not arise in this application.
 22 The points that arise are these. Mr Abdallah has
 23 never stated that this application to withhold
 24 disclosure of these two redacted expert reports is an
 25 application for a restriction order under section 19(2)

1 of the Inquiries Act. In any event, even if we were to
 2 treat his application as one for a restriction order,
 3 what rule 12 says is that it can prevent disclosure of
 4 the material which is the subject of the application for
 5 a restriction order from CPs, and it allows the means by
 6 which core participants can apply for access to the very
 7 material which is being applied for a restriction order
 8 over.
 9 The material in this case, which, if we were to
 10 treat this as a restriction order application, is
 11 subject to the application is the medical reports. They
 12 have not been disclosed to core participants. The core
 13 participants have not applied under rule 12(4) for
 14 access to that material. In those circumstances, even
 15 if treated as a restriction order application, this
 16 application will be being determined without that
 17 material being provided to core participants.
 18 In those circumstances, the argument advanced under
 19 rule 12 adds nothing to the points that have already
 20 been made and I felt that it would be necessary to raise
 21 that with you, sir, given that it raises a matter of
 22 construction under both the Rules and the terms of
 23 section 19 of the Act, having not been made previously
 24 in writing.
 25 Unless I can assist further.

1	SIR JOHN SAUNDERS: That's very helpful and I understand	1
2	better now why Mr Greaney was unwilling to take on the	2
3	argument himself. Thank you for that.	3
4	I think Mr Menon should be given the opportunity to	4
5	respond if he wishes to the points which have been made	5
6	by you and Mr Nicholls.	6
7	MR MENON: Sir, I have nothing to say in response to either	7
8	the submissions of Mr Greaney or Mr Nicholls. I'm	8
9	grateful for the opportunity nevertheless.	9
10	SIR JOHN SAUNDERS: Not at all. I'm grateful for your	10
11	submissions. I will not be giving my ruling	11
12	immediately, but you will be getting it in writing as	12
13	soon as I can deal with it. So thank you very much for	13
14	your submissions and thank you everybody for your	14
15	submissions.	15
16	Mr Greaney, is there anything else we need to deal	16
17	with today?	17
18	MR GREANEY: Sir, there's nothing else we need to do today.	18
19	We will resume next Monday at 10 am on 22 February.	19
20	SIR JOHN SAUNDERS: Okay. Thank you very much.	20
21	(3.40 pm)	21
22	(The inquiry adjourned until 10.00 am	22
23	on Monday, 22 February 2021)	23
24		24
25		25

109

111

I N D E X

112

1	
2	
3	Submissions by MR GREANEY1
4	
5	Submissions by MR COOPER17
6	
7	Submissions by MR ATKINSON30
8	
9	Submissions by MR WEATHERBY40
10	
11	Submissions by MR GOZEM42
12	
13	Submissions by MR SMITH43
14	
15	Submissions by MR GIBBS44
16	
17	(A judgment was given)46
18	
19	Housekeeping47
20	
21	Submissions by MR COOPER49
22	
23	Submissions in reply by MR GREANEY51
24	
25	Submissions by MR GREANEY54

110

communicate (1) 20:18
 communicated (1) 82:3
 communicating (1) 20:9
 communication (2) 41:5
 53:8
 compared (2) 47:16 50:5
 comparison (1) 24:3
 compel (4) 88:19 94:8 95:3
 96:12
 compelled (9) 60:8 67:21
 87:25 94:4,11 95:1,13,20
 97:2
 compelling (4) 70:20
 88:13,21 99:8
 competency (2) 82:13,17
 competing (2) 89:14 95:10
 complaint (1) 76:4
 complete (2) 59:20 77:21
 completely (2) 40:19 41:25
 complex (2) 4:15 56:11
 comprehensive (1) 56:19
 comprising (2) 61:19 63:2
 compromised (1) 57:14
 compromising (1) 71:13
 conceivably (1) 94:7
 concept (1) 101:20
 concern (9) 37:1,4 44:17
 56:4,13,21 58:23 97:12
 106:24
 concerned (27) 8:22 14:23
 17:21 18:7 19:1,25 20:15
 21:24 24:18 26:6 27:4,17
 34:15 42:22 55:18 56:1
 57:10 60:1 61:15 62:25
 80:12 86:15 90:24
 92:11,18 93:16 105:16
 concerning (3) 23:4 28:17
 71:21
 concerningly (1) 32:20
 concerns (12) 8:3 10:17 15:5
 55:20 57:19 60:24 62:10
 63:13 81:13 88:20 91:6
 107:11
 conclude (1) 28:21
 concluded (2) 89:3 99:3
 concluding (1) 73:5
 conclusion (5) 52:13 57:15
 87:22 99:2,21
 conclusions (13) 48:21 52:14
 65:12,14 89:7 91:15 92:25
 93:8 96:10 97:11
 99:1,15,22
 condition (1) 75:11
 conditions (3) 91:8 94:18
 98:8
 conduct (1) 98:15
 conducted (1) 71:5
 conducting (2) 59:10 90:20
 confidence (1) 14:5
 confident (2) 13:24 39:8
 confidentiality (1) 72:5
 confirm (4) 5:24 43:6 84:17
 105:7
 confirms (1) 104:10
 conflict (1) 83:22
 connection (1) 71:10
 conscious (1) 31:19
 consent (5) 103:20,23
 104:13,15,23
 consequence (3) 61:4 62:15
 65:1
 consider (15) 7:14,21 14:19
 15:14 28:5,14 51:13 54:23
 74:15 75:17 82:13 98:13
 103:11,16 105:14
 considerable (5) 15:22 48:24
 63:16 64:6 78:22
 consideration (6) 12:12
 21:25 60:23 62:10 69:15
 73:4
 considerations (1) 39:5
 considered (6) 41:4 52:22
 68:14,17 72:2 75:24
 considering (2) 103:10 105:8
 considers (3) 9:19 64:5 72:12
 consistency (1) 36:25

construction (1) 108:22
 constructive (2) 6:16 57:23
 consult (1) 54:17
 consultant (3) 88:24 89:8
 90:4
 contact (6) 15:21 38:16
 58:20 64:11,16 105:2
 contacted (1) 63:18
 contained (1) 44:8
 contaminating (1) 49:8
 contamination (2) 50:9,10
 contemplated (1) 86:21
 contend (1) 75:10
 contends (1) 65:25
 content (4) 22:12 31:18 72:9
 90:23
 contention (4) 69:8 88:12
 97:7 98:21
 contents (5) 71:4 72:13
 90:23 98:16,18
 contest (2) 98:17,21
 context (6) 63:8 85:8,17
 91:9 96:4,5
 continuation (2) 9:12 19:23
 continue (21) 6:18 7:21 8:14
 9:1,8 12:7 15:13 17:3 18:5
 24:6 28:16 30:16 31:19
 40:13 41:21 47:7 48:13
 49:16 51:1,21 92:16
 continued (1) 7:3
 continues (3) 9:17,24 48:14
 continuing (7) 7:8 10:12
 19:20 44:1 48:17 49:21
 64:3
 contradict (1) 101:2
 contradiction (1) 100:7
 contradicts (1) 89:13
 contrary (8) 45:5 61:14,16
 68:19 77:25 78:1 86:22
 94:9
 contribute (1) 84:9
 contribution (2) 73:20,22
 contributions (2) 56:8,9
 controversial (5) 2:11 29:10
 40:2 48:5,7
 controversy (1) 27:22
 convention (3) 66:23 88:14
 95:20
 conversation (2) 11:18 55:12
 conversations (1) 22:17
 conversed (1) 64:13
 convicted (2) 61:13 62:24
 cooper (37) 11:19 15:25
 16:22,24 17:6,7,8 24:1,10
 25:15,21 26:20 27:7
 29:17,23 36:19
 37:20,21,22 38:19 39:4
 53:17 55:10,14,15
 58:12,18 59:6,21 73:19
 82:5,8,9,21 110:5,21 111:4
 cooperate (4) 52:3 59:17
 64:7 87:4
 cooperating (1) 22:23
 cooperation (2) 51:20 57:8
 cooperative (1) 58:21
 copies (1) 98:11
 core (55) 2:15 5:6 6:13,14
 9:4 10:8,21 12:13,18 16:9
 35:20 47:13 50:13
 53:23,25 58:9,13,14 65:19
 66:17,18,21 67:7,16,19
 68:7 70:4,6,15,25 71:5
 72:1,4 73:20 76:4 78:1
 84:8 86:10 88:6 92:7,22
 93:18 94:6,19 96:16
 97:6,11 102:21 103:5
 105:10 106:19
 108:6,12,12,17
 correct (11) 8:20 43:25
 46:4,10 77:21 79:23 84:1
 103:1,7,14 104:2
 correcting (1) 85:11
 correction (1) 78:5
 corridor (1) 34:14
 counsel (33) 2:9 14:4 15:7
 16:1,2,4,5,7,10,13,14,16

39:18 43:16 44:13
 47:11,12 54:16 61:1 62:13
 65:3 72:23
 73:16,18,19,23 74:10
 76:8 85:4,9 92:24 100:9
 counselling (1) 3:5
 count (1) 37:11
 counting (2) 36:11,12
 country (4) 25:18 26:1 30:13
 75:9
 couple (4) 37:11 48:9 62:1
 101:15
 course (41) 2:13 7:17 16:18
 20:11 22:5,22 38:21
 39:8,25 41:18,20,24 42:7
 45:1 47:5 53:24 57:3 59:22
 60:12 65:1 74:9 75:13
 79:23 87:11,21 92:7,22
 93:1 95:12,13 96:18,20
 97:2 100:15,20 102:6
 103:6,8 106:11 107:10,11
 courtesy (1) 81:23
 courtroom (7) 4:12 11:4,4
 13:4,4,8 15:3
 courtrooms (1) 23:10
 courts (6) 23:7,18 24:7
 50:5,8 51:15
 covid (1) 13:13
 covidsecure (1) 11:10
 cp (1) 22:22
 cps (5) 17:12 36:10 48:19
 83:25 108:5
 create (1) 68:18
 credible (1) 67:10
 credit (1) 13:24
 criminal (3) 32:6 33:11 65:8
 crisis (5) 1:10 6:18 9:18
 41:25 48:14
 criteria (1) 72:16
 criticism (2) 23:2 24:13
 crossing (1) 25:18
 crown (6) 23:7,15,18 24:7
 50:5,8
 crux (1) 28:13
 cti (3) 12:24 60:2 82:11
 ctis (5) 66:10 88:17 94:15
 96:15 97:8
 curious (1) 49:10
 current (5) 8:12 40:13 43:24
 75:25 96:18
 currently (4) 12:17 14:1
 16:11 70:10
 cut (5) 55:25 56:3,22 57:5
 59:14
 cuts (1) 49:19

D

d (8) 27:18 95:23 98:4
 99:11,24 100:20,20 110:1
 daily (4) 6:3 13:22 37:11
 42:16
 date (9) 8:14 12:8 30:2
 53:16,21,21 70:8,10 76:3
 dated (10) 65:22,23
 66:8,10,12,13 84:21,22
 86:8 105:6
 day (9) 1:21 4:21 13:14
 15:17 24:24 32:8 54:14,25
 91:1
 days (9) 2:2 35:12 36:23
 40:16,16 41:6 44:20,21
 49:18
 de (7) 16:17 53:13 82:23
 83:3 101:10,12,14
 deal (15) 1:9,11,15 11:24
 20:25 26:20 31:9 32:25
 34:3 51:1 53:12 61:10
 101:24 109:13,16
 dealing (5) 6:23 19:22 54:4
 62:21 82:18
 dealings (2) 24:11 67:2
 deal (6) 21:14,22 30:4
 53:20 82:19 85:23
 death (1) 96:4
 december (1) 65:23
 decide (1) 83:23

decided (2) 83:23 98:15
 deciding (3) 47:6 95:6,12
 decision (18) 10:15 17:4
 28:15 41:1,18 42:10
 45:7,19,20 49:15 52 53:23
 55:3 60:6,7 74:25 77:9
 99:17
 decisionmaking (1) 77:8
 decisions (2) 41:2 76:13
 dedicated (1) 66:9
 deemed (1) 87:23
 defer (1) 8:5
 defined (4) 69:2 106:18
 107:11,13
 definition (1) 107:15
 definitions (1) 107:19
 definitive (2) 18:21 29:6
 degree (3) 9:6 56:22 103:9
 delay (3) 47:24 61:4 62:15
 delays (1) 52:12
 delegated (1) 57:6
 deliberately (1) 37:6
 delighted (1) 62:8
 demanddriven (1) 30:11
 demonstrated (1) 47:24
 depending (2) 4:25 49:14
 depends (1) 102:5
 deployed (3) 100:9 102:18
 105:15
 deprive (1) 33:17
 deprives (1) 32:12
 depth (2) 27:23 28:4
 describe (1) 9:17
 described (4) 3:10 6:2 7:11
 102:24
 deserve (1) 25:8
 desire (1) 58:7
 despite (4) 24:3 67:22 89:7
 93:3
 detached (1) 97:9
 detail (8) 11:25 44:16 52:11
 84:24 86:8 90:19 91:5
 92:13
 detailed (3) 47:3 59:25 90:24
 details (2) 105:2 107:14
 determination (5) 14:24
 66:2 94:22,24 102:23
 determine (1) 83:11
 determined (8) 65:6 74:18
 81:1,4,11 83:13 94:5
 108:16
 detrimental (1) 99:9
 develop (7) 16:12 28:19
 43:17 84:13 88:5
 105:24,24
 development (2) 55:22 63:21
 developments (1) 1:10
 develops (1) 49:15
 didnt (2) 33:12 104:11
 died (3) 32:4 75:8,13
 difference (3) 100:2,19
 102:21
 different (19) 7:15,15
 25:18,19 26:1 27:16
 31:7,8,24 35:10 39:5 40:22
 50:4 51:16 75:21 85:15
 96:1 99:22 100:21
 difficult (10) 32:11 33:8
 39:11,12 41:1 45:18 76:24
 77:6 79:3 104:5
 difficulties (2) 21:3 35:18
 difficulty (2) 3:9 104:19
 digress (1) 20:24
 diligence (1) 82:17
 diminish (1) 43:21
 diminished (1) 3:4
 direct (3) 6:20 68:15 86:18
 directed (1) 2:12
 directly (5) 20:9,18 29:18
 57:20 106:10
 disagree (2) 45:9 59:21
 disappointed (1) 52:19
 disciplined (1) 66:4
 disclose (2) 71:20 93:11
 disclosed (17) 67:18 69:23
 73:13 76:9,10 78:15 79:22

86:12,13,14 92:22,25
 93:25 94:19 105:10 106:21
 108:12
 disclosing (4) 70:3 71:10
 97:5,10
 disclosure (41) 1:11 60:10
 65:19 66:5,16,21 67:12,15
 69:11,16,21,25 70:24
 72:3,4,19 73:6 74:15 76:25
 77:1,3,7,13 83:25
 85:6,12,21 93:2 94:21,24
 96:20 99:25 100:12 101:22
 103:4,5,7 105:19 106:18
 107:24 108:3
 discouragement (1) 73:21
 discuss (1) 31:16
 discussed (5) 33:2,4 46:19
 68:23 101:21
 discussing (2) 3:14 47:1
 discussions (1) 14:3
 dishonoured (1) 34:20
 disjunct (1) 23:5
 dispute (1) 78:23
 disputed (1) 79:11
 disrespect (1) 41:9
 distances (1) 50:7
 distinct (1) 1:8
 distinction (3) 98:19,21,23
 distinguished (1) 79:2
 distorted (8) 8:4 24:9 34:6
 66:11 69:5 101:18 103:24
 104:1
 distracting (1) 33:9
 distress (1) 48:24
 distressing (1) 15:19
 distributed (1) 93:18
 doctor (1) 91:19
 doctors (1) 77:20
 document (6) 18:14,16
 20:22 27:18 28:19 42:6
 documents (5) 48:1 78:18,22
 93:5,6
 does (14) 16:12 26:3 33:17
 47:20 49:19,20 58:19
 59:10 69:7 72:20 73:5
 78:16 92:8 99:19
 doesnt (14) 26:2,3 29:14,18
 39:17 44:13 45:3 49:22
 51:12 55:10 78:2,16 83:23
 92:10
 done (10) 4:6 22:6 27:2 59:5
 71:4 72:12 78:21,21,23
 79:4
 dont (10) 25:8 37:11 41:9
 42:18 59:18,19 76:19
 100:16 101:2 102:1
 77:12
 double (2) 4:19 5:21
 doubt (11) 21:3 41:17 44:25
 63:23 68:11,18 77:5 85:20
 96:14 105:14,16
 down (4) 25:11 34:14 52:20
 77:12
 dr (49) 65:8,22,23 68:3
 70:12,23 71:7 85:7,7 88:24
 89:3,7,8,9,10,13,15,23,25
 90:2,3,7,7,9,10,20
 91:1,4,7,10,12,14,22,23,25
 92:1,21,21 93:6,7 96:10
 99:1,2,3 103:21,24
 104:13,17 105:4
 draft (1) 53:2
 drafted (1) 86:9
 drawing (1) 104:7
 drawn (2) 98:22 99:21
 ducking (1) 88:9
 due (9) 1:23 6:11 22:5 45:1
 64:19 87:21 94:13 95:12
 107:11
 dunlay (2) 61:25 62:1
 duration (1) 42:11
 during (11) 2:6 4:21 6:18
 13:14 28:6 32:6 33:10
 39:6,21 64:12 65:1
 duty (1) 95:15

E
 e (1) 110:1
 earlier (3) 54:11 60:24 80:18
 early (1) 8:14
 eased (1) 4:24
 easter (1) 44:19
 easy (2) 47:25 48:2
 effect (5) 3:25 4:20 49:4,16
 96:24
 effective (4) 42:3 56:24
 57:13 80:23
 effectively (5) 20:8 25:9 37:4
 76:13 95:14
 efficiency (1) 58:8
 efficient (1) 60:4
 efficiently (1) 58:5
 effort (1) 80:20
 efforts (5) 6:17 17:1 31:2
 34:16 63:16
 eight (5) 36:20 37:21 39:1
 44:20,20
 either (8) 15:9 24:13 28:16
 81:1,11,12 82:14 83:17
 84:8 44:24 65:13 100:8
 109:7
 elements (1) 3:25
 elmehdi (1) 81:9
 else (6) 43:11 61:7 62:18
 65:13 109:16,18
 email (8) 43:5 85:25
 90:17,22,23,25 103:17
 104:8
 emails (1) 86:4
 emerge (1) 14:21
 emotional (1) 50:22
 emphasise (5) 13:7 18:14,23
 30:15 57:11
 emphasising (2) 14:9 20:5
 empowered (1) 72:14
 enable (1) 17:3
 enabled (1) 15:20
 encouraged (1) 50:2
 encouraging (1) 38:16
 end (6) 17:4 53:2 96:9 97:20
 106:6,15
 endorse (3) 17:8 81:25 82:9
 endorses (1) 82:4
 engage (2) 34:1 77:9
 engaged (1) 100:23
 england (16) 3:22 5:6 12:3
 23:11,19 24:2,7,14
 25:7,10,13 30:17 36:18
 49:25 50:3 51:1
 enjoyed (1) 33:18
 enormously (1) 13:24
 enough (4) 37:7 50:2,11
 55:12
 enquiries (1) 34:5
 enquiry (1) 64:4
 ensure (6) 4:5 34:3 35:16
 46:5 58:15 71:15
 ensuring (1) 58:20
 entered (1) 39:22
 entirely (19) 12:19 15:6
 37:14 38:8 39:4,20 47:9
 49:1,21 54:18 82:4 84:1
 85:15 90:14 92:2,3 93:9
 103:14 105:12
 entirety (2) 92:3,6
 entitled (3) 34:24 97:3 99:15
 environment (1) 21:7
 equal (1) 19:3
 equally (7) 19:2 33:10 36:21
 39:6 51:24 59:19 102:7
 equivalent (2) 3:12 98:24
 error (1) 78:12
 essential (2) 4:5 35:23
 establish (3) 11:15 15:3 30:7
 established (1) 30:8
 establishing (1) 11:10
 estimates (1) 55:25
 european (2) 66:23 84:10
 even (13) 7:6,15,25 14:16
 21:5 24:5 53:24 67:16 92:2
 93:5,20 108:1,14
 evening (1) 14:12

event (7) 22:4 58:7 64:7
 68:11,24 73:19 108:1
 ever (1) 95:17
 every (9) 5:18 24:24 26:8
 32:8 50:17 59:14 60:15
 80:20 107:15
 everybody (2) 74:21 109:14
 everyone (14) 1:4,7 6:11
 36:6 43:2 46:1,10,11,17
 49:12 52:15,24 60:13,16
 evidence (110) 1:13,14,22
 2:10,25 3:1,8,10,14,14
 5:12 8:2,6 9:7 11:6 12:16
 15:17 19:22 20:11 24:25
 39:23 40:3,16 48:6,10,25
 49:3,6 50:23 51:10,25 52:5
 60:8 61:11,23 62:22
 63:6,12,17,24 64:6,8
 65:7,16 66:1 67:22,22
 69:4,6 70:11,18,21 71:25
 74:19,23 75:1,4,19,22,24
 76:18,22 77:25 78:2,9,20
 79:11 80:9,11,13,21,25
 81:1,11,12 82:14 83:17
 85:21 87:23,25 88:19,22
 89:4,5 94:9,10,12,19
 95:1,4,9,13,18,20
 96:2,13,18,21,24 97:2,19
 99:5,8,12 100:15 102:25
 106:17 107:12,13
 exactly (2) 8:15 99:10
 examination (4) 56:1 57:5
 90:9 91:25
 examine (3) 56:12 57:17
 90:1
 examined (2) 90:2 91:21
 example (6) 17:22 21:11,17
 22:10 33:6 96:1
 exceed (1) 4:9
 exceptionally (1) 4:8
 exchanges (1) 43:5
 excluded (1) 34:19
 excluding (4) 25:10,11,12,14
 excuse (1) 75:18
 excused (3) 76:7,18 78:7
 exercise (8) 19:4 87:7
 95:9,16,17 96:6 100:22
 105:17
 exiting (1) 6:10
 expect (4) 13:21 17:11 60:2
 78:15
 expected (1) 13:18
 expediency (1) 106:8
 expedited (1) 93:12
 expense (1) 58:8
 experience (4) 23:8 32:10
 59:14 105:1
 experienced (6) 33:5,11
 47:17 90:4 91:19 105:1
 experiences (2) 31:8,8
 expert (13) 1:12 65:7 71:21
 78:2 80:17 82:16 93:7
 96:2,18,21,23 106:17
 107:24
 expertise (2) 82:15 104:18
 experts (2) 78:3 97:23
 explain (2) 7:24 64:10
 explained (3) 10:7 54:6
 90:24
 explanation (4) 25:9,23,24
 90:24
 expose (1) 67:23
 express (5) 8:11 9:1 16:24
 36:5 43:2
 expressed (9) 8:4 19:1,19
 27:13 42:18 48:16 55:20
 56:4,13
 expression (3) 27:20,24
 28:11
 expressions (1) 56:5
 extended (2) 61:18 63:2
 extension (2) 51:19 102:2
 extensive (1) 17:2
 extenso (1) 67:4
 extent (5) 13:23 32:22 69:7
 71:17 80:6

extremely (3) 79:2 93:16
104:25
eye (1) 24:23

F

f (7) 4:1 95:23 98:4 99:11,24
100:20,20
face (4) 9:18 21:20 35:19
78:22
facilitate (1) 80:22
facilities (2) 11:13 26:16
facility (1) 26:9
factor (1) 68:3
factors (1) 25:15
fair (1) 95:6
fairly (1) 87:4
fairness (4) 36:22 66:25 73:7
95:16
faith (1) 87:3
falls (1) 76:1
families (112) 2:21 4:14
6:4,24,25
7:2,8,10,15,18,20,25
8:3,7,10,22,23 9:15
10:9,18 11:5,12,20 12:7
13:8,21 14:4,24 15:7,14,21
16:1,3,4,6 20:1,17
21:12,19,20 22:7,20 23:17
24:18,20,22 25:4,8
26:1,6,9 27:7 28:6,8 29:11
31:7,22 33:1,22 34:25
35:6,18,22,23 36:5,24
37:1,4 40:5,12,19,21,23
41:13,16 43:23
54:14,17,24 56:20,24
57:9,17 58:9 63:11 65:20
66:13,18 70:7,16 73:17
74:24 76:4,12,16
77:1,4,7,13,19,22 80:21
81:13,22 85:5 86:11 93:1,3
95:13 98:19,24 100:9
family (46) 3:2 18 4:10-10
5:9,10,15 6:1,13 8:18
11:2,3 13:2,3,5,18 14:14
21:7 22:22 33:21 34:1,6,11
36:9 37:24 38:1,2,8 39:7
43:15 48:20,23 49:12,25
50:13 51:9,14,20 52:2
54:16 56:6 57:6,8,12 58:14
76:10
fanciful (1) 94:15
far (38) 6:15 8:21,22
17:21,24 18:6,25
19:10,14,25 20:10,14
21:19,24 22:6 23:2,9,18
24:15,17,19 26:5 27:3,4,16
34:14 42:22 52:23
55:17,25 60:16 72:5 73:2
82:24 84:2 92:17 105:22
fastchanging (1) 42:12
fault (1) 105:14
favour (4) 7:8 10:12 19:19
48:17
favoured (1) 27:14
favours (1) 54:21
fears (1) 80:6
february (26) 1:1 2:13,15
3:18,24 5:14 6:11 7:23
8:13 9:22 10:4,11,12 11:16
12:16 44:13 61:3 62:14
64:16 21:66,10,12,14
84:22 109:19,23
fed (1) 101:15
feel (10) 5:23 27:24 29:11
34:19 35:24 37:2 51:24
52:19,20
feeling (1) 37:17
feels (1) 56:14
feet (1) 58:1
fellow (2) 33:21 34:1
felt (7) 31:25 50:21 52:11
58:21 106:8,25 108:20
few (7) 14:13 17:11 22:18
40:1,25 41:5 83:1
fifthly (1) 105:12
figen (2) 38:3,5

figure (1) 64:14
final (1) 15:12
finally (9) 4:23 8:22 16:16
66:12 72:18 73:22 80:8,24
97:7
find (4) 17:13 20:13 22:11
50:8
finding (2) 104:20,21
findings (2) 89:9,13
fine (1) 46:21
finished (2) 38:9,11
firm (1) 51:18
firmly (1) 30:25
first (25) 1:8,15,17 11:1
15:25 28:9 32:12 38:25
45:6 54:4 57:25 61:10
62:7,21 67:8 68:6 69:16
73:15 74:1 82:12 83:25
86:24 95:5 102:17 106:24
firsthand (2) 32:3,13
firstly (3) 19:9 74:13 94:3
fit (5) 29:18 66:1 81:10
87:23 96:25
fitness (1) 80:24
five (3) 5:9 102:11,16
fixed (2) 70:10 96:21
flapping (1) 104:3
focus (1) 33:9
focused (1) 60:6
follow (5) 19:20 49:3 74:16
79:22 102:13
followed (2) 16:5 74:21
following (10) 1:20 2:23 5:8
15:25 48:10 61:12 62:23
73:15 86:3 107:7
follows (5) 10:25 12:14 66:8
69:15 102:17
force (1) 63:11
forensic (2) 88:24 89:8
forever (1) 29:12
forget (1) 29:23
forgive (2) 18:13 87:10
form (9) 19:11,16 22:4 39:18
65:24 70:4 85:8 89:2 98:1
formal (1) 3:1
formally (1) 86:11
formed (2) 36:17 63:22
former (1) 72:21
forthcoming (3) 21:9 28:2
51:21
fortnight (1) 44:20
forward (8) 5:4 6:15 10:6
50:6 59:5 79:7,20 105:3
found (13) 7:4 17:19 26:6
31:10,13,17 32:10 33:7
48:8 49:10 64:22,24 87:18
foundation (1) 104:19
founded (1) 84:4
four (4) 4:10 5:9 38:13 40:16
fourday (1) 35:14
fourth (2) 54:7 71:8
fourthly (1) 105:5
fragile (1) 88:16
frame (1) 11:17
framework (1) 69:23
frankly (1) 100:12
fresh (1) 96:23
friday (2) 10:21 44:19
front (1) 107:8
fruitful (2) 17:13 22:17
fulfilling (1) 17:14
full (7) 3:25 18:12 28:7
29:13 40:16 57:18 72:3
fully (8) 20:8,14 32:2 41:6,23
70:7 77:6 99:20
fundamental (1) 100:2
funding (2) 61:16 62:25
further (33) 2:6 4:18 6:7 8:6
11:25 12:10 14:16,19
28:17 29:7 36:20 39:15
42:19 66:11 70:10 72:11
78:6,9 80:15 81:18 84:22
86:4 87:24 91:20 92:16
94:14 95:23 97:25 100:5
101:13,23 103:7 108:25

furthermore (3) 13:3 14:11
58:7
future (2) 10:15 32:5

G

general (2) 1:25 22:13
generally (4) 6:6 9:20 10:2
21:4
genuine (2) 15:6 49:1
genuinely (1) 59:2
get (5) 26:9 29:10,16 30:17
65:6
getting (2) 28:13 109:12
gibbs (6) 16:14
44:9,11,12,22 110:15
gist (7) 70:12,23 92:24 93:12
97:10 99:1,19
give (58) 1:13 23:22 24:15
44:14 45:8,12,23
46:2,18,25 53:13 55:6 60:8
61:12 62:22 63:12,24
64:1,6,8 65:16 66:1 67:22
68:24 69:1 70:17 71:25
74:19 75:1,4,23 76:22
80:21,25 81:10 82:13,25
87:25 88:19,22 89:4,5
94:4,9,11
95:1,4,9,13,18,20 96:13
97:2,19 99:5,8 100:15
102:25
given (26) 25:24 34:10,11,22
38:18 43:24 46:23 48:11
49:4,6 58:10 69:20 70:20
76:2 77:6,14,15,16 83:8
90:25 96:9 99:1 100:25
108:21 109:4 110:17
gives (1) 54:12
giving (6) 5:12 11:6 39:23
40:3 76:18 109:11
gmp (2) 9:23,24
goddard (2) 8:23 16:6
goes (3) 16:8 45:20 80:14
going (29) 4:1 18:20 27:2
28:5,19 31:1 35:22 40:24
43:15 45:15,16,19
46:18,25 48:19 50:23
59:6,8 73:14 75:16 82:22
83:18 84:7,13 85:1 87:17
90:22 92:16 101:19
gone (1) 52:18
good (8) 1:3,7 23:12 42:25
44:19,24 50:18 55:12
gordon (5) 7:1,8 11:20 16:1
38:15
governed (1) 78:24
governments (1) 6:9
gozem (8) 16:5 42:23,24,25
43:13 73:18 82:3 110:11
grateful (20) 24:10 27:1 31:1
33:15,20 34:15 42:20
43:13 44:4 47:18 55:15
58:18 59:7,22 88:4 98:5
101:4 106:5 109:9,10
gratitude (2) 31:5 43:2
grave (1) 56:13
greaney (66) 1:3,6,7 16:23
17:17 18:17,18 22:18
23:22 26:21 27:13 29:25
30:1 33:4 38:7 39:17 42:22
43:14 44:5,23 45:25
46:4,9,10,20,21 53:4,8
55:15 57:21,22 58:18,19
59:24,25 60:22,23 61:25
62:6 81:21 82:3,22 83:2
84:1 86:6 90:14,16 92:4
100:7 101:7,8 102:9,10,11
104:3,6 106:5,7
109:2,8,16,18 110:3,23,25
111:10
greaneys (1) 22:1
great (5) 31:2 36:1 37:4
48:24 54:25
greater (7) 8:19,19 16:14
44:7 50:7,9,15
greatest (2) 34:23 71:7
groom (1) 97:16

grounds (1) 107:20
group (2) 8:6 33:8
guidance (1) 5:1
guidelines (1) 22:3
guilty (1) 47:25

H

half (2) 2:2 40:16
hand (5) 29:23 48:23 79:24
105:18,20
handled (1) 82:16
happen (3) 44:14 101:22
102:7
happened (3) 27:20 90:13,25
happening (2) 29:14 35:8
happy (8) 45:19 46:1 87:20
88:1,4 92:8 102:6,7
hard (5) 10:22 31:6 34:25
35:1 47:19
harder (1) 3:7
harm (1) 96:4
harmful (3) 7:7 34:21 89:5
hashem (1) 32:7
having (13) 14:11 16:20 28:3
30:19 32:10 49:6 55:19
56:21 93:3 95:20 98:16
99:3 108:23
health (22) 1:10 3:22 5:6
9:18 12:3 23:11,19
24:2,6,14 25:7,10,13 30:17
36:18 48:14 49:14,24
50:3,25 89:6 99:9
hear (20) 1:4 12:16 16:19
24:25 25:22 30:22 40:9
46:17,20,21 48:5 50:20
62:7 74:3 75:7 83:15 84:17
92:15 104:5 106:2
heard (10) 2:7,8 15:17 22:1
35:24 43:14 45:5 48:25
50:6 86:23
hearing (71) 1:8,9,17
2:4 13:14,16,25 3:1,7,13
5:10,16 6:7 7:2 8:1,7
11:2,8 12:15,18,19,21,23
13:2,10,19 14:15,17,25
15:2 16:25 17:5,11
20:9,11,17 21:14,21
22:14,21 24:24 26:12
30:4,18 33:10 36:13 38:9
39:24 47:10 48:10,12,25
49:5,20,24 50:7,14,22
60:13 63:6 67:5 68:13,22
74:14 82:12,16 83:6
101:24 102:4
hearings (26) 1:14,23 2:1,18
4:20,25 7:4 9:1,7,11 19:19
28:24 31:9 35:5 41:21,23
42:17 43:7 47:7,8 48:13
51:22 52:17 61:23 75:4
101:19
heart (1) 80:14
held (4) 48:12 65:10 68:22
96:5
help (3) 10:24 43:9 47:20
109:1
helpful (8) 6:21 16:21 22:16
31:13 52:8 79:13 102:15
helpfully (1) 98:3
hence (1) 42:8
here (12) 19:14 20:5,24 25:3
41:1,2 42:4,5 58:22,25
75:6,9
herself (1) 75:12
hes (5) 38:18 82:5 83:11
91:15,23
hide (1) 87:16
high (4) 9:6 69:3 96:2 98:7
higher (3) 14:18 23:9,19
highlevel (1) 6:21
highlight (2) 94:1 100:21
highly (3) 6:16 90:4 93:16
hillsborough (1) 78:11
himself (2) 87:18 109:3
history (4) 67:2 88:16
93:14,18
hitherto (1) 33:18

hmp (2) 64:15,23
hogan (4) 7:19,24 16:3 38:17
hold (1) 51:22
home (6) 3:2,11 4:21 21:7
22:15 32:11
homes (4) 7:6 11:12
32:18,20
honour (2) 32:2,13
hope (26) 1:3 14:21 15:15
16:21 17:15 29:5 30:22
46:7,17 52:1,7,17 55:2
56:10 57:23 58:16,18
60:3,4,15 64:6 82:17 85:23
91:15 106:9,10
hoped (1) 52:5
hopefully (3) 29:15 59:5,15
hopes (1) 79:25
horrible (1) 21:6
horse (1) 80:6
horwell (2) 16:13 44:6
hours (3) 15:10 103:18 104:9
household (1) 36:18
households (5) 4:10 32:21
36:16,20 38:13
housekeeping (2) 53:7
110:19
houses (1) 49:7
however (13) 2:19 7:25 9:9
10:14 47:22 54:19 65:13
74:12 81:1 85:3 88:19
91:19 96:1
hub (3) 33:3,19 34:13
huddells (3) 8:10 9:14 16:4
huge (2) 33:19 34:16
human (1) 66:24
hundreds (1) 93:20
hurley (1) 37:24
hurleys (1) 38:4

I

id (2) 38:11,13
idea (2) 26:15 68:9
identified (5) 2:18 5:2 61:9
67:10 68:2
identifies (5) 61:6,7 62:17,18
69:3
identify (4) 10:23 62:19
72:11 100:6
identifying (1) 15:18
ignored (1) 95:21
ill (9) 21:11 46:7 59:15 74:13
79:9,13,20 82:5 106:13
illicit (1) 64:22
illness (1) 42:8
im (60) 18:2,8 23:12 24:4,10
36:2,13 37:9,13,22
39:8,11,13,17 40:4 42:20
43:6,13,15 44:4,15 46:4,25
47:18 55:15,18 56:13
57:18 58:18 59:6,7,22
79:9,10 82:22 84:5,12
87:20 88:1,4,4,9 89:19
90:22 91:13 92:2,3,8,12,16
93:9 100:4,4 101:3 102:6
104:6,6 106:5 109:8,10
image (1) 44:18
immediate (5) 4:19 35:16
69:1 96:3,25
immediately (4) 17:8 45:12
90:3 109:12
immunity (1) 107:21
impact (7) 1:22 10:17 20:16
67:25 68:20 85:17 99:9
impacts (1) 92:4
imperative (2) 76:12 81:17
implemented (1) 78:13
importance (17) 8:25 9:7
12:6 15:22 19:3 40:20
43:22 44:1 64:6
72:20,22,25 80:8 83:9 84:6
105:20,21
important (42) 9:23 17:20
18:1,15 19:9 24:17,25 25:1
26:19 28:23 32:1 33:23
39:12,22 40:24 41:8,14,16
42:2,4 45:14 48:19,20

54:25 58:11 63:23 65:11
70:1 74:12,13,25 75:23
76:5,13 77:9,16 78:7 81:15
89:12,17 92:14 94:2
importantly (1) 70:24
imposed (1) 62:14
impossible (3) 29:7 75:11
77:22
impression (1) 37:13
imprisonment (2) 61:19 63:3
improve (1) 85:2
inability (1) 48:24
inaccurate (1) 79:10
inappropriate (1) 75:12
inaudible (8) 8:4 24:8 34:6
66:10 69:5 101:18 103:24
104:1
incapable (2) 93:22 96:22
include (1) 8:18
included (1) 50:15
includes (3) 107:15,16,19
including (1) 2:23 10:9
13:15 37:25 47:11 48:19
58:14 64:13 65:20 71:23
107:19
incompatible (1) 88:14
increase (7) 14:14 15:2 22:19
50:24 88:22 89:6 99:10
increased (3) 3:9 12:2 95:19
increasing (1) 8:17
increasingly (1) 14:20
incredibly (1) 32:11
incriminate (1) 87:18
indicate (2) 15:7 53:9
indicated (17) 5:7 11:20
16:11 18:17,19 22:13
40:14 53:5 54:3 55:3,19
74:7 76:8 84:20 89:2 90:5
91:18
indicating (1) 82:17
indication (4) 44:5 45:2
79:13 88:4
indicative (1) 93:10
indirect (1) 86:19
individual (2) 5:21 13:11
individuals (2) 22:24 23:9
inevitably (1) 67:20
information (9) 24:15
53:21,22 72:16 76:9 77:21
92:23 93:17,20
informed (5) 7:21 16:17 71:1
86:2 94:6
ingenuity (1) 103:2
inhibited (1) 57:1
initial (3) 83:24 84:21 91:3
inquiries (8) 67:1 78:21,24
79:4,11 94:16 95:7 108:1
inquiry (153) 1:13,21 2:10,16
3:21 4:18,24 5:3,24
6:5,6,17,20 7:9,10,12 8:5
9:6,21,24,25 10:3,10,22
11:7 12:12 13:17
15:6,13,20,21 17:15,21,24
18:10 19:15 21:10 22:23
23:11 24:12 25:2,7,12,17
28:4,9 29:4 30:25 31:9,19
32:8,18,19,22,24 33:16
34:1,3 37:3 35:5 43:24 44:1
47:11,17 48:4,21
52:4,9,12,21 55:17
56:7,9,12,14,16,25 57:16
58:2,3 59:10 61:12,23
62:22 63:6,25 64:5,9
65:3,7,10 66:15 67:9
70:8,9,18 71:14,20,25
72:2,7,7,23 73:1,24
74:18,20 75:7,14,16
76:8,14 77:3,8,25 78:14,14
79:1 80:12,19 81:4,12,15
82:18 85:4,5,9 86:2,4
87:22 88:18,23 89:8,17,21
90:6,17 91:6,10 92:8,24
93:11 94:20 95:15
96:13,20 97:2,14,24
100:14 103:2,17 109:22
inquiries (14) 1:9 9:7 44:13

56:17 65:19 67:2
71:11,14,18 74:11 80:17
86:18 87:2 88:13
insistence (1) 56:17
instance (4) 21:17,22 22:9
23:6
instant (1) 100:19
instead (8) 3:1 11:23 54:21
55:1 60:8 67:6 75:22 102:8
instruct (6) 18:24 31:11 35:3
36:19 89:22 91:12
instructed (10) 21:10 38:1
56:14 57:18 88:24 89:8,17
97:23 103:22 104:15
instructing (2) 55:20 91:5
instruction (1) 91:4
instructions (7) 3:8 20:25
26:7,23 27:16 55:19 59:3
intend (4) 15:12 16:12 43:7
84:25
intended (2) 43:21 89:22
intention (2) 45:12 54:3
interest (4) 6:20 83:13,17
107:20
interests (3) 77:16 95:11
106:7
interfere (1) 69:16
interference (6) 69:12,19
71:16 72:24 73:2 77:14
interrupt (4) 37:22 78:19
89:19 90:15
interrupting (1) 87:11
interruption (6) 86:2,5 88:25
89:11,24 91:1
interviewed (3) 63:25 91:21
99:4
into (11) 7:6 19:4 32:16
34:17 52:11 59:12 76:1
85:7 95:11 105:4 107:14
intolerable (1) 22:11
introduce (1) 4:19
introduction (1) 55:16
introductory (1) 16:20
intrusion (1) 7:5
intrusive (2) 49:8 71:12
investigate (1) 58:6
investigated (1) 11:9
investigating (1) 74:23
investigation (1) 52:7
invite (10) 15:7,24 16:21
40:4 55:10 73:14,22,24
101:10 103:15
invited (1) 72:10
inviting (2) 53:23 55:3
involve (2) 12:2 80:21
involved (5) 3:21,22 77:15
86:22 103:2
involvement (3) 56:25 86:19
97:17
involving (1) 81:16
irrelevant (5) 72:9 76:9
92:23 93:7,13
isnt (2) 27:2,2
issues (9) 1:15 2:9,21,22
3:16 74:16 82:13,18,24
itd (1) 40:16
its (44) 1:5,14 8:

john (60) 1:3 16:23 24:1
 25:15 26:14 27:6 29:8,23
 30:23 36:3,13 37:8 38:6,23
 39:14 40:6,9 42:20 43:13
 44:4,22 45:13
 46:1,7,13,17,25 53:4
 59:6,23 60:12 65:23 74:4
 78:19 81:20 82:2,21 83:19
 84:15,18 87:10 88:1,8
 89:19 90:16 91:17
 92:10,19 98:2 99:13
 101:3,7,12 102:2 104:3
 106:4,12 109:1,10,20
 joining (1) 25:21
 joint (3) 66:12 74:6 81:22
 judge (2) 14:7 48:2
 judgment (10) 45:22,23
 46:2,23,25 47:4 53:2 78:25
 95:22 110:17
 july (5) 64:12 86:8 87:9
 88:12 105:7
 juncture (1) 97:4
 june (4) 54:22 55:1 64:1 86:6
 jurisdiction (1) 81:8
 jurisdictions (1) 75:6
 jurisdiction (1) 84:10
 justification (1) 99:24
 justify (2) 70:2 97:4
 juveniles (1) 98:6

K

keen (4) 20:7 30:9 37:17
 39:17
 keenly (2) 18:9,11
 keep (5) 25:20 31:1 35:22
 46:11 48:18
 kent (21) 65:23 85:7
 89:8,23,25 90:2,7,7,9,20
 91:1,7,22,25 92:21 93:7
 99:2 103:21,24 104:13,17
 kents (1) 89:10
 kept (2) 42:15 49:13
 key (6) 3:25 20:5 80:14
 86:16 95:5 100:4
 kind (1) 33:4
 knew (1) 91:8
 know (19) 16:18 17:10
 18:3,7 20:19 24:19
 26:17,19 38:18,19
 42:12,18 45:11,14 56:7
 57:7 58:19 60:13 104:17
 knowledge (2) 86:20,23
 known (3) 4:19 61:21 63:4
 knows (2) 1:7 6:11

L

lack (1) 7:5
 lacking (1) 92:13
 laid (1) 58:1
 laidlaw (2) 16:15 45:2
 lamb (1) 97:14
 laptop (1) 11:13
 last (20) 10:21 14:12 17:11
 22:18 23:3 27:21 32:9 41:5
 47:9 48:4,9 51:1 61:21
 63:4,7 70:9 81:2 86:1,8
 88:21
 later (6) 1:16 44:17 46:6
 48:22 82:25 87:22
 latest (1) 64:12
 latham (20) 65:22 68:3 85:7
 88:24 89:3 90:3,10
 91:4,10,12,14,23 92:1,21
 93:6 96:10 99:1,3 104:25
 105:4
 lathams (7) 70:12,23 71:7
 89:7,9,13,15
 latter (3) 23:16 72:21 76:1
 lawful (1) 73:3
 lawfully (1) 71:2
 lawyers (1) 6:5
 lay (2) 17:18 19:1
 lead (2) 57:7 73:16
 leading (5) 14:4 47:11 54:16
 63:19 88:24

leads (1) 57:9
 learned (1) 32:5
 least (5) 8:6 10:12 34:11
 55:16 85:8
 leave (1) 88:1
 leaving (1) 4:21
 left (1) 75:8
 legal (39) 1:21 2:3,17 3:5
 5:3,11,24 6:5 7:9 9:6,21,25
 10:3,11,22 11:7 12:12
 13:16 15:6,13,20 17:23
 20:10,19 25:12 28:7 29:3
 31:2 33:19 43:24 47:11
 58:3 63:25 64:5 65:10
 66:15 67:9 72:7 75:5
 legally (1) 87:6
 legitimate (4) 40:23 41:11
 70:5 77:17
 length (2) 59:11,19
 less (6) 40:23 47:21 48:2,5
 60:4 71:12
 lessons (1) 32:5
 let (3) 26:20 36:3 52:20
 letter (2) 91:20 103:16
 liaise (1) 58:13
 liaised (2) 38:14,15
 liaison (2) 17:12 38:20
 licence (4) 61:20,20 63:3,4
 life (2) 42:7 69:2
 lifetime (2) 96:5 98:7
 light (6) 1:9 12:10 52:6
 63:22 80:5 88:15
 like (17) 21:12 26:17 29:5,13
 37:20 43:2,2,12,20 44:10
 53:15,19 62:6 75:7
 102:13,16 105:3
 likely (5) 11:16 14:19 51:12
 53:10 88:22
 limitation (1) 70:2
 limitations (1) 89:10
 limited (4) 2:23 40:17 72:23
 77:14
 line (5) 18:21 19:24 29:6,13
 64:4
 link (2) 39:19 46:6
 links (2) 46:11,12
 listen (2) 18:10 49:7
 listening (2) 18:9,24
 little (7) 20:24 23:17 42:10
 43:1 47:2 60:3 82:9
 live (2) 61:5 62:16
 liverpool (8) 11:17,22
 26:3,16,24 30:7 51:8 64:23
 living (1) 32:17
 loath (1) 37:22
 local (1) 3:23
 locate (1) 51:8
 locations (1) 11:11
 lockdown (1) 1:20,22 4:24
 6:10 14:21
 lodged (1) 44:3
 london (1) 65:9
 long (4) 8:16 18:5 19:11
 34:25
 longer (1) 56:15
 look (6) 4:24 30:14 51:12
 52:16,25 104:6
 looking (1) 51:5
 lose (1) 81:12
 loss (2) 35:12,15
 lost (1) 84:6
 lot (3) 26:9 44:21 83:7
 loved (6) 21:14,22 32:2,4,14
 34:20
 loveless (4) 7:19,24 16:3 38:17
 lunch (4) 26:8 53:12,15
 60:20

M

magistrates (2) 4:3,9
 magnitude (1) 20:16
 main (4) 4:12,15 5:10 88:9
 maintain (3) 15:20 18:12
 41:13
 maintained (2) 19:16 20:6
 maintains (1) 28:24

majority (8) 7:7 10:8,9
 19:17 18 41:12 48:16
 54:20
 makes (2) 5:22 75:11
 making (12) 3:7 31:3,20
 38:18 40:18 49:22 55:18
 59:17 98:10 100:4,25
 104:4
 manage (3) 3:7 13:18 39:25
 managed (2) 51:8 58:2
 management (2) 59:12
 79:25
 manchester (7) 12:22 13:14
 16:14 27:8 44:7 86:20
 97:18
 manner (1) 7:13
 many (5) 28:1 47:15
 48:19,19 93:23
 maragh (3) 61:1 62:13 86:7
 march (11) 6:8 8:14 14:17
 35:10 39:20 40:15
 42:11,12 43:9 44:15 64:20
 marked (1) 22:1
 martyrdom (2) 64:13,13
 material (22) 15:8 21:6
 23:21 57:17 69:7 71:23,23
 77:2 80:6 97:21,22
 99:6,7,16,20 107:16,19
 108:4,7,9,14,17
 materials (1) 103:6
 maths (1) 34:5
 matter (17) 18:7 23:3 26:22
 27:2 28:14 29:22 47:1 59:5
 71:3 80:25 81:23 82:15
 97:3,20 98:2 106:5 108:21
 matters (13) 3:6 12:4 18:15
 22:14 46:19 52:6 56:12
 57:19 58:6 68:23 80:14,16
 87:13
 matthew (1) 65:8
 maximum (3) 4:14 30:17
 50:16
 mean (3) 4:21 13:15 43:9
 meaningful (3) 71:5 76:17
 77:22
 means (4) 5:19 15:16 61:5
 108:5
 meant (3) 23:1 58:22 59:11
 measure (1) 71:12
 measures (3) 10:23 32:24
 35:5
 media (6) 67:23,25 68:1
 93:22 101:15,21
 medical (18) 49:14 74:15
 75:3,11,16,24 76:5,6,19,19
 78:14 80:4 81:6 93:13,18
 98:12 99:7 108:11
 meet (2) 34:17 79:15
 meeting (1) 3:22
 meetings (4) 15:13,15,19
 17:17
 member (6) 12:24,25 13:6
 16:17 53:5 58:25
 members (29) 2:3 3:2,21
 4:11 5:9,15 6:1 8:18
 11:2,3,7 13:2,3,18 14:14
 32:21 33:21 34:6,11 36:9
 38:8 48:20,23 49:25 50:13
 51:9,14,20 52:2
 memory (3) 32:2,14 34:20
 menon (36) 61:1,6
 62:6,12,16 73:24 79:7
 84:13,16,17,19 87:10,20
 88:4,9 89:19 90:17 91:17
 92:2,10,15,20 98:23 99:23
 101:3,6,11 102:19 105:13
 106:9,14 107:3,5 109:4,7
 111:8

menors (1) 106:6
 mental (4) 88:16 89:1,6 99:9
 mention (2) 25:16 53:16
 mentioned (6) 10:25 25:16
 30:6 36:23 88:2 95:22
 mere (1) 56:3
 merits (1) 70:19
 messages (1) 35:20

met (1) 72:17
 methods (1) 23:14
 microphone (1) 104:4
 middle (1) 8:13
 middleton (2) 90:19 91:19
 might (14) 3:9 20:23 21:5
 34:13 52:11 53:5 56:15
 74:8 78:5,6 81:7 87:18
 90:14 100:14
 mildly (1) 20:13
 mind (3) 78:19 98:3 102:4
 minded (1) 100:14
 mindful (2) 57:2 77:5
 minds (6) 23:23,23,24 24:23
 36:7 98:20
 minimised (1) 71:17
 minister (3) 1:19 6:9 14:12
 minority (2) 7:10 20:1
 minutes (8) 45:22 56:3 60:3
 61:5,9 62:1,16 101:18
 mirrors (1) 9:14
 misconceived (1) 68:5
 misconception (1) 85:11
 misplaced (1) 14:6
 miss (1) 59:18
 mistaken (1) 86:9
 misunderstands (1) 107:5
 misunderstood (1) 105:13
 mitigate (2) 67:25 68:20
 mobile (1) 64:22
 moderator (1) 62:2
 moment (19) 5:22 11:18
 12:1 26:15,17 29:14 41:24
 43:12 44:23 45:8 51:5,12
 53:13 55:6 68:9 84:7 87:11
 89:15 90:15
 momentum (9) 7:4 19:10,15
 20:5 28:23,25 41:14,15
 48:18
 monday (6) 30:8,9 44:19
 47:7 109:19,23
 months (2) 17:11 96:23
 more (27) 4:3,8,10,25 5:23
 6:6 23:21 25:18
 29:5,10,10,16,16 31:22
 33:8 39:23 42:10,12
 47:3,23 53:10 60:3 71:23
 90:12 93:4,11 97:10
 moreover (3) 66:18 72:5,7
 morning (11) 1:3,7 14:4
 17:18 26:21 33:4 34:5
 42:25 43:6 103:20 104:12
 most (13) 6:19 11:16 21:1
 31:13 32:20 36:23 48:8
 50:8 65:15 67:25 70:24
 72:2 94:2
 move (5) 32:17 59:5
 79:13,20 85:24
 moving (1) 25:6
 ms (5) 16:10 44:5 61:1 62:13
 91:19
 much (28) 16:20 18:8 33:8
 41:20 42:15 46:9
 52:1,9,11,22 59:7,23
 60:8,17,18 74:4,8 76:1
 79:3,12 81:20 83:5,19
 84:18 101:4 102:11
 109:13,20
 multiple (1) 83:10
 murray (1) 38:2
 must (18) 4:4,6 5:17 28:25
 36:6 42:3 58:8 75:16,24
 77:12 80:19,21,22,25
 81:11,12 94:18,20
 muted (2) 56:6 57:12
 myself (1) 35:4
 mystified (1) 23:17

national (5) 1:20 4:23 5:1
 6:18 12:2
 natural (1) 28:12
 necessarily (3) 18:20 29:18
 102:1
 necessary (17) 3:24 11:24
 14:1,20 15:11 45:15,16
 50:21 52:7 56:18 62:8
 65:12 78:8 94:21,24
 106:19 108:20
 necessity (2) 47:2 51:24
 need (30) 6:4 13:10,17 29:11
 33:13 34:22 35:4,17 36:8
 37:18 46:5 52:13
 58:5,6,10,16 59:16,17 61:8
 62:19 66:3 71:9 79:9 80:12
 85:5 87:12 100:12,16
 109:16,18
 needed (2) 11:14 68:13
 needing (1) 4:16
 needs (7) 14:8,9 29:1 34:17
 42:15 45:1 60:13
 negative (1) 27:8
 negotiation (1) 39:18
 neither (1) 26:15
 network (1) 33:18
 networks (1) 3:4
 neutral (10) 11:10 15:3,16
 27:4,12,23 30:6,13 33:3
 49:21
 neutrally (1) 19:2
 never (3) 36:6 93:6 107:23
 nevertheless (3) 87:17 89:11
 109:9
 newcastle (1) 33:12
 next (22) 6:22 7:17 14:13
 15:10,24 30:8,8 39:25
 40:4,13 42:22 45:21 47:6
 50:1 51:5,17 52:17,24
 55:10 73:14 105:23 109:19
 nicholls (9) 102:13 105:23
 106:1,2,5,13 109:6,8
 111:12
 night (1) 39:10
 nine (2) 4:10 66:11
 nocomment (1) 86:5
 none (1) 43:6
 nonetheless (3) 21:8 62:9
 81:23
 nor (4) 26:15,17 40:22 49:20
 note (25) 1:21 2:17,17,20
 3:5,11,17,20 5:2,7 6:2,3
 7:23 9:3,22 10:4,11
 33:15,15,16 35:19 44:13
 80:2 89:12 94:15
 noted (1) 42:6
 notes (5) 79:21
 nothing (18) 31:4 43:11
 59:21 69:9 73:9 82:5
 87:15,16 89:12 95:2 96:11
 100:6,8,17 102:20 108:19
 109:7,18
 notwithstanding (1) 88:17
 november (5) 61:21 63:4
 65:22 70:9 90:18
 nuance (1) 21:2
 nuanced (2) 19:7 28:22
 number (29) 4:14 8:17,19
 14:14 20:25 21:1,12 22:10
 23:6,7,9,19 24:20,22 28:3
 30:17 34:10 38:10,12
 50:11,14,15,16 55:21
 64:25 70:5 71:15 72:10
 78:20
 numbers (7) 4:7 14:18 15:2
 22:20 23:4 38:14 51:19
 numerical (2) 10:16 19:4
 numerous (4) 19:21,21,22
 63:18
 nwas (5) 9:16,19,20 16:11
 44:6
 nwf (4) 9:4,14 16:7 43:18

o
 object (1) 85:9

objective (5) 69:4 70:1,20
 72:20 77:17
 objectives (9) 70:1,5
 71:11,14,18 72:22 73:1
 105:21,22
 obligation (1) 66:24
 observation (3) 16:8 43:4
 55:16
 observations (1) 17:9
 observe (3) 8:18 14:8 57:15
 observed (1) 5:17
 obstructive (1) 58:24
 obtain (2) 63:16 86:3
 obtained (2) 65:7 71:22
 obvious (6) 5:4 13:20 42:4,7
 54:12 74:21
 obviously (13) 13:9 14:9
 21:25 26:18 29:14 37:10
 44:17 45:13 75:5 76:11
 80:4 83:20 100:1
 occasion (3) 64:20 74:10
 82:14
 occasions (4) 59:15 63:18
 72:11 78:20
 occur (3) 14:21 55:1,6
 occurred (2) 76:3 86:25
 oclock (6) 1:5 11:19 17:17
 59:24 60:2,11
 october (3) 88:21 103:18
 104:8
 odd (1) 87:19
 oddly (1) 87:13
 offer (1) 25:4
 officer (1) 74:23
 officers (1) 3:23
 often (1) 38:8
 okay (7) 27:6 38:6,23 44:22
 46:7 101:3 109:20
 once (9) 29:20 30:4 36:4
 38:11,13 53:20 64:23 78:9
 100:22
 ones (6) 21:14,22 32:2,4,14
 34:20
 ongoing (3) 1:10 9:18 41:16
 opaque (1) 97:8
 open (6) 17:22 41:23 67:20
 68:16 72:14 83:6
 opening (7) 2:8 61:23
 63:6,15 64:10 65:2 74:22
 opinion (4) 54:20 89:15,15
 97:23
 opportunities (1) 83:20
 opportunity (11) 21:18,21
 26:21 32:12 45:8 53:13
 55:9 98:17 107:10 109:4,9
 opposed (3) 6:2 33:6 98:9
 opposition (1) 8:1
 optimism (4) 41:24 42:13,14
 48:15
 optimistic (1) 14:13
 option (1) 75:15
 options (1) 41:4
 oral (1) 1:14,22 9:1,7 61:23
 63:6 68:13,22 85:3
 106:15,24
 order (27) 2:15 15:25 38:21
 61:2,4 62:13 67:16,24
 68:19,23 72:15 73:15 84:7
 93:21 95:4 98:12,14 99:13
 103:4 107:17,18,25
 108:2,5,7,10,15
 ordered (3) 60:9 66:6,17
 orders (1) 96:5
 organisational (4) 6:14 9:4
 16:9 84:8
 original (3) 70:8 85:14,16
 others (16) 2:4,22 3:15 7:4
 15:15 18:22 29:20 31:20
 37:2 41:13,17 47:12,18
 50:20 51:10,15
 otherwise (1) 2:25
 ought (10) 42:16 55:1 61:6,8
 62:17,18 73:6,13 74:25
 102:25
 ourselves (2) 13:22 20:13
 outcome (2) 16:25 52:9

outset (3) 42:1 61:2 95:25
 outside (1) 3:13
 outweigh (2) 72:21,25
 outweighs (1) 105:22
 over (13) 12:11 17:11 22:18
 39:18,25 41:5 44:8 47:23
 48:4,9 51:17 67:3 108:8
 overflow (1) 4:12
 overriding (1) 86:14
 overshadow (1) 54:13
 overshadowing (1) 54:24
 overspeaking (2) 26:14
 36:14
 overspill (1) 22:21
 overstated (1) 69:19
 oversubscription (2) 14:7,16
 own (9) 26:5 78:24 79:12
 81:1,11 90:7,9 98:20
 102:14

p
 painful (1) 32:10
 pandemic (2) 21:20 22:7
 paper (2) 104:4,7
 paragraph (15) 2:19 3:20 4:2
 8:9 18:16 19:18,18 27:18
 42:6 69:20 77:24 81:2
 94:15 95:23 97:7
 paragraphs (7) 5:2 9:2 67:12
 69:13 71:6 73:10 96:15
 part (10) 11:6 18:1 51:16
 65:25 76:14,17 77:8 79:17
 103:3 104:11
 participant (6) 53:25 58:9
 66:19 73:20 78:1 94:7
 participants (48) 2:16 5:7
 6:13,14 9:4 10:8,21
 12:13,18 16:9 23:19 47:13
 50:13 53:23 58:14,14
 65:20 66:17,22 67:16,19
 68:7 70:4,6,15,25 71:6
 72:1,4 76:4 84:8 86:10
 88:6 92:8,22 93:19 94:20
 96:17 97:6,11 102:22
 103:5 105:11 106:19
 108:6,12,13,17
 participate (6) 20:8 24:18
 25:1 40:21 76:13 95:14
 participated (1) 20:14
 participating (2) 17:25 47:15
 participation (9) 6:19 18:12
 21:15 42:3 56:24 57:13,18
 76:3 80:23
 particular (20) 15:17,18
 18:25 20:25 30:12 31:3
 37:16 39:7,7 51:23 70:16
 85:19 91:1,7 93:25 97:4,22
 102:19 103:14,25
 particularly (9) 3:2 14:23
 15:19 17:20 18:11 37:17
 70:6 83:21 86:11
 parts (6) 1:8 18:14 25:18
 30:13 51:3 68:15
 party (1) 99:25
 pass (1) 52:18
 passed (1) 27:21
 past (1) 24:11
 paul (1) 62:1
 pause (13) 20:3 35:5,11,25
 41:10,19 45:8,10 53:12
 55:8 61:25 84:7,11
 pauses (1) 7:10
 pausing (2) 5:22 11:18
 peer (3) 89:9 90:6,20
 people (35) 4:3,8,10,25 8:19
 23:5,6,7 25:17,25 29:16
 30:9,18 33:8
 36:9,11,12,13,16,20
 37:9,12,12,14 39:10,23
 45:14,19 46:5 47:15,23
 48:8 50:6,16 93:20
 perception (2) 57:11,11
 perfectly (13) 7:14 18:21
 20:2 2

perform (2) 96:6 100:22
 perhaps (12) 13:19 23:14
 25:16 26:2 27:10,22,25
 28:10 29:19 56:15 87:20
 88:5
 period (12) 1:16 2:6 6:18
 7:11 10:20 20:3 28:6 39:20
 40:17 51:6 62:20 65:5
 peripheral (2) 75:21 80:12
 permit (1) 105:23
 permits (1) 6:19
 permitted (5) 4:8,11,14
 23:10 50:25
 permitting (1) 22:7
 perplexed (1) 26:2
 persisted (1) 88:18
 person (10) 1:12 4:5,25 5:20
 7:5 8:8,17 13:19,25 14:15
 personal (7) 23:8 72:8 76:9
 80:4 92:23 93:13,16
 personally (2) 22:8 91:22
 persons (2) 38:12 95:23
 perspective (2) 40:15 59:12
 persuade (5) 67:21 94:8
 96:12 100:10,17
 persuasively (1) 49:2
 perused (1) 18:8
 phrase (2) 40:2 102:19
 physical (5) 12:21 34:9 41:20
 96:4 97:1
 physically (1) 29:4
 pick (2) 17:16 104:11
 picture (2) 39:9 105:4
 pieces (1) 104:7
 place (15) 8:13 9:11,19 17:3
 22:3 23:14 28:24 29:1
 32:25 35:6 50:9 61:3 62:14
 77:15 83:25
 plain (3) 7:7 13:17 14:22
 plainly (5) 3:6 4:1,3 69:22
 71:11 73:13
 plan (1) 6:9
 planned (1) 86:21
 planning (2) 63:13 97:17
 play (1) 63:20
 please (8) 36:6 42:23 52:23
 53:16 74:1 87:10 92:19
 101:12
 plot (1) 80:15
 pm (12) 1:16,17 46:14,16,22
 53:1,3 60:19,21 62:3,5
 109:21
 pointing (1) 79:17
 points (14) 49:11 59:1 67:7
 73:9 74:12 78:3,4,5 86:16
 102:12,16 107:22 108:19
 109:5
 police (3) 16:14,15 44:7
 pose (1) 102:22
 position (23) 5:14 9:2,14,21
 10:3 21:4 35:10 37:19
 49:11 52:22 54:2
 66:15,17,19 67:9 68:4 82:6
 86:7,14 89:14 92:11 98:25
 99:11
 positive (1) 58:21
 positively (1) 57:24
 possession (1) 64:22
 possibility (2) 11:10 33:3
 possible (21) 7:12,22 8:5
 9:9,24 11:1,15 13:7 14:14
 21:19 27:24 30:7 31:1,4
 41:23 48:6 54:11 56:11
 71:17 75:1 87:7
 possibly (4) 5:10 52:23 88:23
 95:3
 potential (4) 30:10 57:5,10
 85:17
 potentially (6) 44:21 57:13
 94:19 106:17 107:12,13
 powerful (2) 3:16 49:9
 powers (1) 79:25
 practical (2) 61:3 62:15
 practice (1) 17:21
 precisely (1) 93:10
 predicated (1) 56:21

predict (1) 48:6
 predictable (1) 93:9
 predicted (1) 18:19
 preferring (1) 26:11
 prejudice (1) 17:4
 preparation (2) 63:13 97:17
 prepare (5) 2:16 45:22 47:3
 88:25 89:24
 prepared (1) 90:5
 preparing (2) 61:13 62:24
 presence (1) 12:21
 present (22) 2:25 3:3,15
 5:12,15 11:8 13:2 20:9
 21:13 22:8 32:1 34:7 39:24
 42:2 47:10,23 51:16,23,25
 83:14 97:19 99:4
 presentation (2) 20:23 22:24
 presented (5) 19:23 20:11,23
 21:4 22:14
 presently (1) 18:1
 press (22) 13:6 16:18 24:14
 25:7 30:16 50:2 53:5 59:16
 64:8 83:2,14 85:18 86:25
 98:10,12,15 99:13 100:25
 101:8,13 102:5 111:6
 pressing (5) 25:20 27:11,15
 52:10 55:17
 prevail (1) 76:25
 prevent (2) 65:19 108:3
 preventing (2) 67:17 72:15
 previous (1) 82:14
 previously (1) 108:23
 primarily (1) 25:3
 primary (2) 44:17 97:11
 prime (3) 1:19 6:9 14:12
 principal (2) 96:8 102:17
 prior (8) 13:13,14 53:15 65:5
 86:20,23 87:22 98:4
 prison (5) 61:22 63:5,18
 64:18 86:24
 prisoners (1) 105:2
 privacy (1) 77:14
 private (2) 72:13 93:17
 privilege (2) 64:2 105:8
 probably (1) 38:17
 problem (3) 21:8 45:24,25
 procedural (2) 17:15 95:15
 proceed (1) 12:7
 proceeding (3) 10:1 52:4
 79:18
 proceedings (15) 7:6,21
 10:18 19:10,21 26:11,11
 31:14 32:11 35:17 58:5
 61:25 74:22 78:10,12
 process (27) 8:20 17:25
 18:1,13 19:12,23 20:3,15
 24:25 25:1,2,3 32:13
 34:18,24 58:2 75:2 76:2
 77:3,6 78:13,17 79:23
 80:22 81:13,16 96:9
 produce (1) 90:10
 produced (1) 90:11
 professional (1) 17:14
 professionalism (1) 56:19
 progress (4) 10:15 38:20
 44:21 51:22
 progressed (1) 52:6
 promised (1) 34:18
 proper (3) 11:12 59:11,19
 properly (7) 18:21 58:16
 59:10,18 60:15 87:4 91:11
 proportionality (2) 77:18
 95:10
 proportionate (1) 73:3
 proposal (2) 12:11 44:23
 proposals (3) 9:25 10:10
 34:15
 propose (4) 13:1 15:23 65:11
 92:25
 proposed (16) 7:9 9:21 19:20
 26:25 31:19 34:7 44:14
 50:24 70:13 72:19 78:14
 89:23 90:1 92:23 105:19
 107:20
 proposing (7) 45:13,21 71:20
 72:3 85:10 92:17 97:9

proposition (2) 5:23 79:19
 prospect (1) 2:20
 protected (1) 79:23
 provide (6) 6:21 47:5 50:25
 72:1 73:5 78:17
 provided (10) 13:22 47:20
 69:23 77:20 86:10 93:6
 98:11,12 106:23 108:17
 provides (2) 58:16 70:20
 providing (1) 3:8
 provisional (1) 5:3
 provoke (1) 103:5
 prudent (1) 9:10
 psychiatric (17) 60:10 65:21
 67:22 77:24 78:8 85:7,12
 87:23 89:15 91:7 92:20
 94:10 97:5,10,23 98:8
 99:25
 psychiatrist (10) 88:25
 89:9,23 90:5 99:17 103:21
 104:14,20,21 105:1
 psychiatrists (1) 99:14
 psychological (6) 2:24 20:22
 21:16 49:4 50:21 88:15
 ptsd (1) 104:2
 public (22) 3:22 5:5 12:3
 23:11,19 24:2,6,14
 25:7,10,13 30:16 36:17
 49:24 50:2,25 60:13 80:3
 83:14,17 96:13 107:20
 publication (8) 30:2
 53:16,20,21 54:13,21,25
 72:15
 publicity (5) 67:24 68:1,2
 85:18 101:21
 publicly (2) 24:14 61:21
 publish (5) 48:21 52:13
 54:3,6 77:2
 published (1) 54:10
 purely (1) 10:15
 purpose (2) 14:17 98:10
 purposes (3) 36:18 72:7 77:7
 pursuant (4) 67:8 69:23
 95:7,15
 pursue (3) 64:3 69:25 70:4
 pursued (2) 67:8 71:19
 push (1) 12:7
 pushed (1) 12:7
 pushing (1) 37:2

Q

qaeda (1) 64:14
 queens (16) 15:25
 16:2,3,5,6,10,13,14,16
 43:16 61:1 62:12
 73:16,18,19
 query (1) 88:3
 question (8) 9:9 11:21
 25:8,22 41:22 50:1 73:7
 102:23
 questions (15) 12:25 47:13
 48:3 56:7 58:11,15 64:2
 69:14 71:8 81:15 83:21
 86:18 87:2,17 88:13
 quickly (3) 29:16 35:15
 45:14
 quiet (1) 33:9
 quite (4) 27:11 79:16 92:13
 100:11

R

radicalisation (2) 63:9 80:14
 radicalise (1) 97:16
 rail (1) 56:22
 raise (15) 9:9 23:3,21
 53:18 20:21 55:11,11
 56:14 57:18 59:1,4 83:21
 88:3 108:20
 raised (15) 10:17 11:21 15:5
 21:6 23:3 25:25 26:22
 57:19 78:10 79:15
 80:17,18 88:20 104:18
 106:10
 raises (1) 108:21
 raising (1) 58:23

ramadan (1) 81:8
 rapidly (1) 52:4
 rare (1) 78:8
 rate (1) 65:24
 rather (7) 26:12 34:13 37:17
 48:22 61:11 79:7 91:23
 rational (1) 71:9
 reach (7) 28:15 39:4,9 48:21
 77:25 81:14 105:7
 reached (6) 8:21 10:25 35:2
 68:13 91:15 99:14
 reaches (1) 99:3
 reaction (1) 48:2
 read (12) 24:12 48:1 60:15
 74:7 84:20 87:11,13
 98:4,17,19 101:20 104:10
 reader (1) 65:8
 readily (1) 13:9
 reading (1) 100:5
 real (10) 8:1 11:13 21:8,8
 66:4 69:1 75:17 81:13
 96:3,25
 reality (4) 12:3 34:12,15 35:3
 really (7) 26:4 43:1 49:22
 56:21 79:6 83:5 99:19
 reason (13) 23:13 24:17
 27:12 28:12 44:24 50:5,19
 57:4,5 84:1 87:1 94:13
 101:22
 reasonable (2) 57:4 80:20
 reasonably (4) 20:2 22:2
 57:16 58:10
 reasoned (3) 25:9 78:25
 99:18
 reasons (23) 13:19 24:5
 27:13 29:9 33:12 49:1,3
 54:10 69:19 74:20
 75:3,8,16,17 76:6,19 78:8
 81:6 87:8 93:23 95:1 99:20
 107:7
 reassurance (2) 23:24 58:17
 recall (1) 106:13
 recalled (3) 61:22 63:5
 104:24
 receipt (1) 10:20
 received (9) 3:21 5:5 6:12,22
 18:4 53:8 66:7 93:3 101:17
 recent (3) 7:5 55:22 95:22
 recently (1) 21:1
 recognise (10) 2:20 3:6,11
 6:17 12:6 15:6 35:7,21
 36:25 63:10
 recognised (5) 5:17 41:15
 recollection (1) 104:10
 recommence (1) 2:1
 recommendation (1) 91:11
 recommended (2) 91:10,14
 record (2) 41:3,8
 recovery (1) 29:13
 redacted (6) 1:11 65:21 70:4
 71:21 74:15 107:24
 redactions (3) 72:8,11 92:7
 reduce (2) 5:19 14:15
 reducing (2) 11:7 41:16
 reexamined (1) 100:13
 refer (7) 4:1 27:19 29:19
 60:25 62:11 65:11 80:8
 reference (6) 61:24 63:7
 70:21 78:11 85:16 105:5
 referred (6) 68:16 80:15,18
 84:2 86:6 98:3
 referring (1) 98:5
 reflecting (1) 19:7
 refused (3) 64:1 89:25 90:8
 regard (8) 9:25 10:16
 14:5,11 36:6 37:5 71:15
 103:15
 regular (6) 14:20 31:11 32:7
 39:2 42:17 64:16
 regularly (6) 24:2 36:21
 37:24 38:2,3 50:17
 reinterviewed (1) 100:13
 reiterate (1) 85:8
 reject (1) 97:7
 rejected (1) 68:6
 relate (2) 80:6 107:2

related (4) 61:16 63:1 80:2
 104:1
 relates (2) 30:2 107:6
 relating (1) 82:13
 relation (8) 2:8 30:11 53:11
 87:16 91:3,4,6,7
 relationship (3) 17:14 65:4
 107:6
 relatively (2) 51:2 75:20
 relayed (1) 106:7
 released (2) 61:20 63:3
 relevance (2) 39:7 63:12
 relevant (10) 58:6 61:11,11
 62:22 65:15 72:2 80:9
 85:24 93:5 105:1
 relied (2) 71:24 106:14
 relies (1) 99:23
 religion (1) 65:8
 reluctance (1) 36:1
 reluctant (1) 79:10
 rely (2) 22:22 79:10
 relying (5) 37:13 64:2 79:8
 100:20,24
 remain (7) 8:15,16 23:17
 24:3 56:10 78:16 86:13
 remains (2) 23:5 55:2
 remand (1) 64:15
 remarks (2) 16:21 30:19
 remember (1) 82:14
 remembrance (1) 54:15
 remote (6) 2:22 12:19 33:11
 34:13 47:9 48:13
 remotely (7) 2:5 10:19 15:14
 31:14 47:12,14,15
 removal (1) 2:24
 remove (1) 72:8
 removed (1) 92:23
 reopen (2) 4:16 12:8
 reopened (3) 4:13 11:23 12:1
 reopening (1) 12:4
 repeat (10) 16:12 54:8 62:9
 66:5 67:5 74:14 85:20
 89:16 90:22 96:10
 repetition (1) 84:25
 replaced (1) 80:11
 reply (5) 57:21 102:10,12
 110:23 111:10
 report (17) 30:2,3 54:4
 65:21,22 70:12,23 71:7
 89:1,3,10,12,24,24
 90:5,7,10
 reported (3) 68:24 80:3
 86:25
 reporting (6) 67:17 68:17,21
 69:1 72:16 93:22
 reports (56) 1:12 18:3 60:10
 65:21,24 66:6,16,22
 67:12,15 68:10
 69:16,22,25 70:3,24
 71:4,10,21 72:1,4,9,13
 73:12 74:15 76:6,20 77:19
 78:9,15 79:21 80:5 85:7,13
 92:6,20 93:2,24 97:5
 98:12,16,18,20 99:16,25
 100:5,6,8,16,17 101:1
 103:4 106:17,19 107:24
 108:11
 represent (27) 18:4,9,15,22
 19:2,8,14,25 20:2 21:17
 22:10 27:1,14 28:22 29:2
 30:25 31:23 33:1 36:15
 37:9 39:13 40:12 55:21,24
 57:10,20 59:2
 representations (4) 67:20
 98:9,11,14
 representative (5) 5:11,11
 11:5,5 13:5
 representatives (3) 29:3
 33:19 67:3
 represented (9) 5:13
 7:1,16,19 8:10,23 61:1
 62:12 102:6
 representing (1) 36:10
 represents (6) 21:2 43:23
 44:6,6 45:3 50:20
 require (6) 4:16 22:24 68:11

75:18 78:5,6
 required (4) 52:6 68:14 75:4
 95:4
 requirement (2) 4:6 77:5
 requiring (3) 69:4 75:15 89:5
 resilience (1) 33:19
 resolution (1) 39:19
 resolved (1) 6:4
 resoundingly (1) 77:13
 respect (6) 13:12 34:23
 77:11 81:3 85:18 94:13
 respectable (1) 91:18
 respected (1) 35:25
 respectful (6) 91:10 96:12
 97:4,19 98:25 100:2
 respective (1) 90:4
 respond (5) 54:1 57:22 73:25
 103:6 109:5
 responding (2) 9:18 84:4
 response (6) 3:17 6:12 55:5
 67:6 85:3 109:7
 responses (1) 6:22
 responsibility (2) 57:25 59:9
 responsible (3) 3:23 56:23
 79:24
 rest (3) 23:23,24 52:21
 restore (1) 26:14
 restricted (4) 94:19 106:17
 107:12,13
 restriction (16) 61:2 62:13
 67:16,24 68:19,23 72:15
 93:21 107:17,18,25
 108:2,5,7,10,15
 result (9) 1:25 2:22 10:20
 43:5 52:20 54:15,23 88:20
 96:9
 resume (3) 7:12 12:15
 109:19
 resumed (1) 9:11
 resumption (1) 35:14
 return (1) 41:23
 review (13) 2:12 6:7 8:14
 22:2,4 28:25 40:14 42:16
 49:13 89:9 90:21 97:3
 107:10
 reviewed (2) 49:17 90:7
 reviews (1) 14:19
 revisit (1) 29:8
 richard (2) 65:22 104:25
 rightly (1) 45:18
 rights (22) 66:22,24 67:11,18
 69:13,17 70:3 71:17
 72:19,24 73:2,4 76:15,24
 85:14,19,23 88:14
 95:17,21 103:11 105:19
 rise (3) 54:12 68:24 69:1
 risk (21) 5:9 11:20 13:11
 14:7,16 28:9 35:8 43:25
 50:9 54:12,24 68:3,18 69:2
 88:23 89:6 95:19 96:3,25
 99:10
 riskfree (1) 5:18
 risks (3) 42:5,5,7
 roberts (2) 16:10 44:5
 robust (1) 77:1
 role (1) 63:20
 room (56) 2:4 3:13,13
 5:10,16 8:7 11:2,8
 12:21,23 13:2,10 14:15,25
 15:3 20:17 21:14,21 22:21
 23:13 24:24 26:12 29:4
 30:18 32:14,16,17
 33:2,7,10,13,17,22,24
 34:4,8,12 35:7
 36:8,14,21,22 37:3,7,10,18
 38:9 39:10,22,24 47:10
 48:25 49:5 50:5,22 51:19
 rooms (3) 4:12 22:15 23:5
 round (2) 62:7 79:17
 routinely (1) 8:8
 ruled (2) 2:1,6
 rules (9) 22:3 69:24 94:16
 106:14,18,20 107:12,14
 108:22
 ruling (9) 45:12,14 46:18
 79:1,18 94:11 99:17 102:5

109:11
 run (2) 2:19 58:5
 runoff (1) 36:24

S

sacrificial (1) 97:14
 sacrosanct (1) 22:6
 safe (4) 8:16 12:9 24:8 30:18
 safeguards (1) 77:15
 safely (2) 4:6 11:1
 safetyfirst (1) 42:9
 sally (1) 90:19
 salman (10) 63:10,17,21
 64:11,14,18,25 65:4 81:3
 97:16
 same (6) 25:23 33:12 47:22
 64:21 65:23 82:6
 sat (1) 32:9
 satisfied (1) 48:9
 satisfaction (5) 14:5 94:18,21
 99:6 100:23
 saunders (59) 1:3 16:23 24:1
 25:15 26:14 27:6 29:8,23
 30:23 36:3,13 37:8 38:6,23
 39:14 40:6,9 42:20 43:13
 44:4,22 45:13
 46:1,7,13,17,25 53:4
 59:6,23 60:12 74:4 78:19
 81:20 82:2,21 83:19
 84:15,18 87:10 88:1,8
 89:19 90:16 91:17
 92:10,19 98:2 99:13
 101:3,7,12 102:2 104:3
 106:4,12 109:1,10,20
 save (1) 2:7
 saying (10) 17:16 30:24 36:8
 37:8 45:11 79:6 92:12
 96:14,16,21
 schedule (1) 12:17
 scheduled (2) 12:17 28:2
 screen (2) 37:20 48:1
 screens (1) 104:7
 scrutinised (1) 75:24
 scrutiny (1) 103:9
 seating (1) 3:13
 seats (1) 34:8
 second (9) 1:11,17 11:9
 32:16 39:3 68:17 69:21
 88:11 95:6
 secondary (1) 28:8
 secondly (3) 30:6 58:4 103:3
 seconds (1) 83:1
 secretariat (10) 3:22 10:23
 11:9 17:1,10,13 31:3 43:3
 49:23 51:7
 section (12) 61:14,17 67:1
 72:16 73:8 80:1 95:7
 107:2,6,17,25 108:23
 sections (1) 18:10
 secure (1) 77:1
 security (1) 54:5
 see (32) 7:3 15:8 18:16
 23:16 30:22 32:13 34:2
 37:6,17,19 38:20,21 40:8
 46:17 67:12 69:13 73:10
 74:3,9 76:24 77:7,19
 84:8,17 98:13
 99:13,15,16,16,18 100:16
 106:2
 seeing (1) 99:19
 seek (4) 78:9,16 80:22 103:5
 seeking (8) 39:19 67:20
 71:25 73:1,21 88:10 96:8
 98:6
 seem (3) 23:10,20 29:14
 seems (5) 29:12 35:3 37:19
 65:3 84:12
 seen (8) 5:6 13:22 19:17
 26:8 38:13 40:11 68:10
 78:9
 selective (1) 50:19
 selfharm (4) 68:3 88:23
 95:19 97:1
 selfincrimination (2) 64:3
 105:8

selfish (3) 34:22,24 36:4
selftest (1) 13:13
senior (2) 64:14 74:23
sensible (1) 59:3
sensibly (1) 101:1
sensitive (1) 72:9
sentence (2) 61:18 63:2
sentenced (2) 61:18 63:1
september (4) 24:24 61:24 63:7 88:21
series (2) 74:12 86:3
serious (4) 42:8 96:3 97:1 98:8
serve (1) 65:14
served (2) 88:6 92:6
services (1) 3:5
set (17) 3:20,24 6:9 9:2 10:3 30:14 35:18 37:5 67:4 84:23 86:7 87:2,8 88:2 90:19 91:5 93:23
setting (3) 3:1 15:16 87:14
seven (6) 11:2 13:1 49:25 50:11,15 51:14
several (2) 6:13 93:20
severity (5) 69:18 72:18,21 105:18,22
shane (1) 38:15
shed (1) 63:22
sheffield (7) 11:17,22 26:3,16,24 30:7 51:9
shorn (1) 76:9
short (29) 5:7 9:13 35:4,15,25 41:10,19 42:11 44:12 46:2,2,15,18,20,25 47:2 53:19 55:13,18,25 56:3,22 58:20 59:15 62:4 66:15 89:14 101:9 102:12
shortcomings (1) 48:8
shortly (2) 3:19 106:6
shortterm (1) 41:22
should (82) 2:12 4:9,11,12,13,14,18 5:18,20 6:7 7:21 8:14 9:8 12:15,16,17,19,21,24 13:1,3,6 18:3 19:16 20:19 21:20 25:16 27:22 29:3 31:1,4,21 32:1 34:9 40:13,14 41:10,20 44:14 45:17 47:8 48:13 56:16,25 57:2 58:1 60:7,9 62:9 63:10 65:18 66:6,16 67:21 68:6 69:19 74:19 75:4 76:7,8,10,18,22,22 78:7 81:6 83:24 86:14 87:7 89:23 92:6,21,25 93:11,24 94:4 95:1,12 97:20 100:13 106:21 109:4
shouldnt (1) 30:9
showing (1) 11:13
shown (1) 68:25
showsec (3) 10:5 16:16 45:3
shut (2) 53:25 55:5
sic (1) 5:15
side (1) 77:13
sides (2) 49:9 60:14
sight (4) 71:4 81:12 84:6 88:7
significance (1) 65:5
significant (8) 4:7 5:13 7:3,9 20:1 25:20 27:3 69:5
significantly (1) 71:22
silence (1) 87:8
similar (3) 25:22 78:12 82:15
similarly (2) 7:18 10:5
simone (7) 16:17 53:13 82:23 83:3 101:10,12,14
simple (3) 69:6 71:3 94:23
since (11) 8:3 9:11,19 10:20 17:11 20:15 24:24 54:9 61:22 63:5 64:12
single (1) 71:6
sir (189) 1:3,7,25 3:16 5:22,25 7:14 10:6 12:24 13:16 14:22 15:12,23 16:18,23 17:8,15 18:2 19:3,17 20:4,19 21:10,25

22:13,16 24:1,10,19 25:15,21 26:14 27:6,10,14,18 28:14,21 29:8,23 30:1,6,22,23,24 32:8,15 33:7,14 34:12,18,23 35:4,11 36:3,13 37:8,22 38:6,7,23,25 39:14 40:4,6,8,9 42:20,22,25 43:10,13,14,20 44:4,5,22,23 45:11,13,25 46:1,7,9,13,17,25 53:4,15 54:2 55:9 56:4,8,20 57:2,7,15,19,20,22 58:6,19 59:1,6,21,23 60:10,12,23 61:10 62:6,14 63:6 64:10 65:7,18 66:7,25 67:6,17 68:6 69:8 71:1,9 72:14 73:12 74:3,4 78:19 81:20 82:2,3,12,21,22 83:19 84:1,14,15,17,18,20 87:10,20 88:1,8,11 89:19 90:14,16,17 91:17 92:2,10,19 94:8 96:24 97:25 98:2,24 99:13,23 101:3,6,7,8,12 102:2,11 103:13 104:3,6,24 105:5,23 106:2,4,12,13,25 107:4,9,18 108:21 109:1,7,10,18,20
sire (1) 28:17
sit (4) 4:11 6:18 10:12 44:24 29:12,15 32:25 39:25 42:12 43:24 49:13,14,15 51:3,13 52:10 89:21 100:3
sixth (1) 72:18
size (1) 23:13
skills (1) 59:12
slater (5) 7:1,8 11:20 16:1 38:15
slightly (3) 19:7 87:13 91:20
small (3) 14:7,16 83:5
smaller (1) 38:10
smith (9) 16:6,10 38:15,19 43:15,19,20 44:4 110:13
so-called (1) 58:25
solely (4) 71:6 72:6 103:22 104:14
solicitor (13) 55:20 58:1 86:1,4,5 90:17,18 91:5,6 103:16,17 104:9,17
solicitors (4) 59:4 89:25 90:3,8
soliman (1) 81:8
solution (1) 33:5
someone (2) 103:23 104:16
something (10) 19:12,14 30:3,15 44:16,25 50:3 53:6 96:17,19
sometimes (2) 38:10 56:2
somewhat (1) 26:2
soon (5) 12:8 26:14 30:18 41:23 109:13
sooner (1) 48:22
sort (4) 45:23 82:15 91:24 97:14
sorted (1) 44:16
sought (3) 32:8 33:25 91:1
sounds (1) 34:22
space (1) 49:25
spaces (2) 36:8 43:10
spake (2) 18:18 20:18
speaking (1) 26:21
specialism (1) 103:25
specifics (1) 44:14
speculate (1) 24:5
speed (1) 106:8
spinningfields (17) 4:13,16 11:22,25 12:5,6,8 25:22,24 26:4,4,12 27:9,10,11,15 33:6
spoke (1) 54:15
spoken (3) 83:10 103:19

104:12
squad (1) 58:25
stable (1) 11:14
staff (2) 4:17 11:21
stage (12) 1:23 5:5 6:8 14:8 15:23 53:22 59:7 68:12 87:22 90:20 101:10 105:7
stand (1) 12:4
start (2) 60:11 85:11
started (1) 53:4
starting (1) 47:6
starts (1) 16:24
stated (3) 81:2 94:17 107:23
statement (3) 2:9 64:10 86:3
statements (2) 2:8 74:22
stating (1) 42:3
step (1) 5:18
stepping (1) 3:10
steps (1) 71:15
steward (2) 38:3,5
sti (4) 12:25 55:25 56:22 58:3
still (5) 36:2 46:11,11 48:14 71:18
stop (1) 47:8
stopping (1) 49:20
straight (2) 29:6,13
stream (2) 61:5 62:16
strength (1) 8:1
stress (1) 41:16
strict (1) 72:5
striking (1) 13:23
stringent (1) 69:3
strong (3) 14:24 48:17 54:19
stronger (1) 21:5
strongest (2) 8:5 87:7
strongly (4) 22:12 31:25 66:18 85:9
struck (1) 43:25
subject (9) 13:11 72:5 73:23 77:1 93:21 103:8 107:16 108:4,11
subjecting (1) 103:10
submit (20) 18:1 19:13 21:10,18 23:8 28:23 35:23,25 37:23 43:23 56:20 69:11 73:3,8 78:1 80:10 83:12 93:11 102:25 105:21
submits (2) 50:12 66:16
submitted (4) 67:14 85:1 94:13 105:17
submitting (2) 85:12,21
subparagraphs (1) 4:1
subsequent (1) 35:14
substance (1) 8:2
substantial (2) 50:24 69:4
substantially (3) 2:11 40:2 103:1
substantive (2) 74:16 79:22
success (1) 26:5
succinct (1) 56:11
suffering (1) 91:9
suffers (1) 75:10
sufficient (3) 31:10 75:17 76:7
sufficiently (1) 70:1
suggest (8) 8:20 20:2 57:4 69:14 71:8 73:5,13 104:25
suggested (10) 5:19 7:23 8:15 22:20 66:19 67:24 90:3 91:13,16 96:15
suggesting (2) 21:24 79:10
suggestion (1) 51:7
suggests (2) 37:15 50:18
suicide (6) 68:3 88:23 89:6 95:19 97:1 99:10
suitable (1) 92:7
summarise (1) 67:6
summarised (2) 9:3 102:18
summary (9) 6:21 76:2 85:8 89:2 90:12 92:3,11 98:1 106:16
superb (1) 26:9
support (17) 3:4 5:8 7:5,22 9:1,12 12:4 13:23

33:18,20,21 38:22 48:18 49:20,20 69:7 79:19
supported (1) 66:18
supporting (2) 4:24 93:5
supportive (2) 9:21 10:2
supports (1) 65:9
sure (15) 14:22 18:2 23:12 24:4 41:6 44:16 47:19 51:20,22 52:2 59:9,17 91:13 92:2,4
surprise (2) 55:10 93:15
suspect (2) 30:1 36:17
suspicion (2) 86:20,23
suter (6) 38:14,15 46:4,10 53:9 104:9
swift (1) 22:2
swifter (1) 74:8
swifly (3) 74:13 79:14,20
switch (1) 32:19
system (1) 48:9
systems (1) 47:16

71:25 73:3 84:13 93:7,21 106:20,25
theres (8) 23:21 43:11 59:16,21 83:7 98:23 100:12 109:18
theyre (1) 27:9
theyve (2) 78:4 88:6
thing (3) 15:12 39:3 91:24
third (4) 1:20 6:10 68:22 69:25
thirdly (2) 30:15 103:13
though (1) 34:16
thought (4) 30:12 34:25 62:8 88:3
thoughts (1) 54:24
three (12) 30:1 36:15,20,23 37:9,23,25 38:4,5 43:6 47:10 54:4
threshold (3) 27:25 28:15 69:3
through (8) 31:12 32:14,15 34:2,21 35:20 93:13 101:19
time (57) 1:5 5:1 7:11,25 11:13,15,16 14:10,10 17:20 18:17,19 26:8 28:25 35:8,9,13,16 36:14 37:10,13,15,15,18 39:21 43:8 47:2 49:18 51:6 52:10 55:17,23,25 56:2,17,18,23 57:4,16,25 58:10,15 59:19 62:7 66:2 82:12 83:10,20 86:24 87:21 91:9 97:21 99:4 100:14 101:18 104:21 106:24
timed (2) 103:18 104:8
times (7) 19:7,21 21:5 51:25 56:10,22 83:10
tipplles (1) 98:11
today (26) 18:23 19:6 22:4 23:22 38:12 41:22 42:10 44:17 45:7 47:24 48:16 53:24 60:6,24 65:12,17 66:2,4,5 83:5 84:3 92:5 94:1,5 109:17,18
today's (2) 1:7 2:14
to-day (6) 7:3 38:7,11 51:11,18 75:2
too (5) 41:17 52:19,20 54:25 75:10
took (1) 58:19
topic (1) 45:6
term (1) 35:16
terms (11) 8:5 26:10 49:17 97:9 107:1 108:22
terrorism (5) 61:14,15,16 62:25 63:1
terrorist (2) 86:19 97:18
test (3) 4:21 95:10 96:20
testing (2) 4:19 5:21
thalia (1) 86:7
thank (49) 16:23 17:5,8 25:21 27:6 30:23 36:3 37:22 38:23 40:6,9,11 42:20 43:13 44:4,12,22 46:9,13,21 57:20 59:6,23 60:17,18 74:4 81:20,25 82:2,21 83:3,3,19 84:15,18,19 88:8 90:16 92:19 101:3,4,6,12 102:8,11 109:3,13,14,20
thanks (1) 16:25
thats (30) 8:8 15:23 25:11,12,13,19 26:18 27:7,10,23 29:7 41:11 44:2,16,25 46:10 51:10 75:7 76:3 79:13 83:9 88:9 90:14 91:16 94:12 95:5 100:24 102:14 106:10 109:1
theirs (1) 40:23
themselves (5) 22:23 40:21 49:10 80:16 81:14
therefore (18) 7:22 9:13 28:21 35:11,15 36:1,17 50:8 51:13 55:1 60:13

U
ultimate (3) 94:3,25 102:24
ultimately (1) 99:2
unable (1) 76:16
unacceptably (1) 71:13
unanimity (4) 6:15,25 7:18 54:18
unanimous (1) 19:13
unascertainable (1) 75:14
unavoidable (1) 21:7
unaware (1) 79:18
unchallenged (1) 89:16
unchanged (1) 9:13
unclear (1) 103:25
uncontested (1) 89:16
unconventional (5) 27:19 51:2 75:20 20 99:12
unconvertoed (1) 96:2
underestimate (1) 20:20
underestimated (1) 20:19
underline (2) 65:14 74:14
underlying (1) 70:19
undermine (1) 31:5
undermined (1) 95:21
undermines (1) 91:15
underplaying (1) 40:20
understand (28) 11:24 13:25 23:12 24:16 32:3,3 35:21 36:19 39:14,20 59:8 60:12 63:20 67:14 70:7,16 79:6 81:5 89:20 92:14,15 93:1,2,19 99:20 101:8 106:16 109:1
understandable (2) 7:14 49:1
understanding (4) 3:7 20:12 70:18 103:13
understates (1) 103:1
understood (2) 41:7 103:3
undertake (1) 5:20
undertaken (2) 12:11 31:6
undertaking (3) 72:6 77:5 78:17
undertakings (2) 77:2,4
undoubted (1) 95:14
unequivocal (2) 89:7 96:10
unfit (11) 89:4 94:8,11 95:4,8,18 96:13 97:19 99:5 100:10,18
unfortunately (1) 107:5
unified (1) 18:20
unique (1) 9:17
university (1) 65:9
unknown (1) 95:23
unless (11) 29:7 39:15 43:10 45:4 57:3 79:4 81:18 92:15 97:21,25 108:25
unlikely (2) 3:12 73:19
unobtainable (1) 75:9
unprecedented (1) 94:12
unpredictable (1) 41:25
unsupported (1) 68:5
unsurprisingly (1) 54:18
until (12) 7:11 8:6,14 39:20 40:13 42:11 43:9 77:19 83:23 88:1 101:20 109:22
unusual (1) 20:12
unwell (1) 75:10
unwilling (1) 109:2
updates (1) 31:11
upon (15) 3:8,16 5:1 10:17 20:21 21:10 22:22 30:19 59:3 60:6,8 65:25 76:23 81:1,11
urge (3) 8:4 19:15 25:6
urgently (1) 29:1
used (5) 47:17 56:5 64:24 71:12 102:19
useful (3) 43:4 52:8,8
utmost (1) 8:25

V
v (1) 95:23
vacated (1) 70:9
valid (2) 24:21 25:23
valuable (1) 7:17
value (4) 7:3 56:8 96:17,19
varied (1) 48:16
variety (2) 54:9 75:8
various (3) 78:24 104:6 106:22
vary (1) 14:9
venue (6) 11:11,15 15:4 31:15 33:3,11
venues (11) 11:16,22 15:9 26:24 27:5,13 30:6,10,11,13,14 40:22 41:10 42:17
via (2) 74:23 77:3
victim (1) 26:4
video (2) 90:21 91:2
viewed (1) 57:23
viewing (4) 10:18 11:11,12 15:4
viewpoints (1) 41:6
views (15) 5:3 7:15 19:1,5,7,8 31:21 36:5 40:22 41:10 42:17 48:12,16 78:4 102:15
vigilant (1) 28:10
violate (1) 67:17
violated (1) 67:11
violation (3) 21:6 68:25 77:4
virtual (5) 17:21 19:23 20:14,23 28:23
virtually (8) 19:20 20:10 21:13 22:11,14 24:21,24 26:8
visit (1) 64:19
visited (3) 63:17 64:14,18
vital (1) 19:11
vitality (2) 31:25 33:23
voice (1) 35:24
volume (5) 30:3 53:16 54:4,6,10
volumes (1) 54:4
vulnerable (1) 94:8

weve (6) 21:1 44:3 64:4
69:20 80:17 82:24
whatever (10) 16:25 19:11
22:4 41:2 48:15 50:23
56:17,18 57:16 76:21
whats (2) 43:22 90:22
whatsoever (2) 21:3 97:17
whereabouts (1) 75:14
whereas (2) 7:4 50:20
whereby (1) 28:6
wherever (1) 26:25
whichever (2) 45:20 49:15
whilst (5) 6:14 64:15,17
71:18 87:14
whole (2) 37:18 58:3
wholly (1) 68:20
whom (3) 13:25 75:6 79:1
whos (2) 39:11 74:21
whose (6) 7:1,19 9:16 33:19
52:17 80:10
widely (1) 80:3
wider (1) 39:9
wifi (1) 11:14
wilkinson (1) 65:8
wish (29) 16:19 17:19 19:12
25:5 29:11 35:20,22 37:7
39:23 41:9,13 44:7 45:3,6
50:14 51:23 52:9,12 53:5
63:20 66:3 79:4 90:6 92:15
94:1 95:5 101:9 102:5,12
wished (2) 50:19 86:2
wishes (12) 1:13 16:7 35:24
52:1,18,19 81:24 82:6,23
101:11 105:24 109:5
wishing (2) 5:20 36:21
withheld (1) 107:20
withhold (1) 107:23
witness (34) 2:3 5:12 8:6
11:6 12:25 13:5,8 40:1
48:2 50:17 51:23 63:23
65:11,15 74:19,25
75:8,13,18,19,21,23 76:1
80:10,25 83:9 94:8,11
95:4,8,17 96:13 100:10,18
witnesses (29) 27:19,21,23
28:1,2,3,5,10 29:1,10
32:13 37:16 39:6,22 41:17
45:17 48:5 50:19 51:2 56:2
57:6,7,9 75:6 78:7,15
81:4,7,14
wont (3) 53:25 55:5 107:14
wording (1) 77:19
work (17) 4:17 9:24 12:10
14:2 17:10 27:1 31:6 33:12
38:21 44:1 46:11 47:19,20
52:3,16,24 78:6
worked (8) 9:20 10:22 15:16
17:12,14 47:15,17 48:9
working (2) 44:20,21
works (1) 31:17
world (1) 63:21
wouldnt (4) 27:15 44:18,18
98:3
writing (10) 11:25 15:9 16:8
28:20 68:12 85:1 91:5
93:24 108:24 109:12
written (29) 16:12 18:6,14
20:24 35:19 40:11 42:25
43:17 44:2,9 45:4 47:3
60:1,16 67:4,13 68:15
69:13 70:13 73:10 74:6,9
78:11,25 81:2 85:3 87:9
101:17 106:23
wrong (5) 10:14 46:4 53:18
66:19 100:8
wrongly (1) 86:12

X

x (1) 110:1

Y

year (12) 1:19 10:13 61:21
63:4,7,19 64:21 65:23 70:9
86:1,8 88:21

years (6) 61:19,19,20
63:2,2,3
yesterday (2) 12:11 26:23
yet (1) 93:3
youll (5) 18:13 24:22 82:14
106:13 107:10
youre (9) 36:8,10 59:7
79:6,6,14 84:1 100:25
104:3
yourself (1) 79:8
yourselves (2) 103:22 104:15
youve (5) 18:2 22:1 38:7
74:7 84:20

1

1 (9) 1:16 2:24 30:3 53:16
54:10 67:18 70:6 86:17
110:3
10 (17) 2:9 11:4 13:4
39:6,9,21 51:4 58:2 61:5,9
62:16 83:7,13,21 84:2,6
109:19
1000 (1) 109:22
10article (1) 102:3
10minute (1) 62:20
11 (14) 1:5,24 11:19 34:6,8
36:8 38:8,10,13 39:23
61:3,12 62:14,23
1100 (1) 1:2
12 (13) 21:12,17,23 22:9
39:5 46:22 51:4
107:1,5,8,11 108:3,19
1206 (1) 46:14
121a (1) 106:18
121b (1) 107:14
1225 (1) 46:6
1230 (4) 45:23 46:3,8,16
124 (2) 106:14 108:13
1240 (2) 53:1,3
124a (2) 94:16 106:20
1251 (1) 60:19
13 (2) 1:13 63:9
14 (2) 7:25 86:1
1422 (2) 103:18 104:9
15 (1) 56:3
16 (2) 1:1 2:13
17 (4) 2:19 61:17 64:21
110:5
173 (3) 67:1 73:8 95:7
18 (6) 2:2,20 5:14 8:13 9:20
64:19
19 (6) 70:9 72:16 80:1
107:2,6 108:23
192 (2) 107:17,25

2

2 (43) 1:17 3:4 18:16 32:9
35:12 44:24 47:8,9 48:4
49:17 50:1 51:1,5,17
52:17,25 53:11 59:24
60:2,11 66:9,23
67:8,11,18,22
68:5,14,18,25 69:9 70:15
76:14,23 77:9 78:10 84:5
85:14,16,22 88:15 95:15
100:23
20 (5) 54:11,21 56:3 60:3
101:18
200 (1) 60:21
2005 (3) 67:1 69:23 95:7
2006 (5) 61:15 69:24 94:16
106:14,20
2014 (2) 64:12,12
2015 (1) 64:16
2016 (2) 61:12 62:23
2017 (2) 64:19,20
2020 (4) 64:1 65:22 87:9
103:18
2021 (2) 1:1 109:23
207 (1) 62:3
21 (2) 54:12,21
22 (11) 3:20 4:2 5:14 6:11
8:24 10:12 11:16 12:16
19:18 109:19,23
230 (1) 62:5

238 (1) 103:11
24 (5) 5:2 9:2 64:12 86:8
105:7
25 (4) 2:7 7:2 45:22 90:18
26 (6) 42:6 64:1,16 66:9
84:21 86:6
29 (3) 44:15 103:18 104:8
2c (1) 77:24

3

3 (29) 3:9,24 6:8 14:17
39:20 40:15 42:11,12 43:9
66:10,23 67:9,11,18
68:1,5,14,18,25 69:9 70:24
76:23 77:10 84:5
85:14,16,22 88:15 100:23
30 (3) 8:11 46:22 110:7
33 (3) 5:2 7:20 9:2
340 (1) 109:21

4

4 (4) 1:19 15:10 61:20 63:3
40 (1) 110:9
42 (1) 110:11
43 (1) 110:13
44 (1) 110:15
45 (2) 9:23 66:12
46 (3) 9:5 95:24 110:17
47 (1) 110:19
49 (3) 10:2 66:14 110:21

5

5 (7) 35:12 44:15 49:18
61:14 66:12 71:12 84:22
50 (1) 9:16
51 (1) 110:23
54 (2) 10:5 110:25
55 (2) 61:19 63:2

6

6 (2) 64:20 95:23
67 (1) 111:2
69 (1) 67:12

7

7 (2) 2:8 63:7
71 (1) 67:12
72 (1) 69:13
73 (1) 69:20
76 (2) 111:4,6
78 (1) 111:8

8

8 (28) 2:15 3:18 7:23 8:9
9:22 10:4,11 63:7,13 65:22
66:23 69:11,12,17 70:2
71:16 72:19,24 73:2,4
76:24 77:11 83:22 84:5
88:15 102:3 105:15,19
80 (1) 94:15
81a (1) 96:15
81b (1) 96:15
82d (1) 97:7
86 (1) 69:13
87 (1) 73:10

9

9 (10) 1:24 11:4 13:4 15:13
17:17 22:21 44:13 63:7
65:23 66:14
95 (3) 61:19 63:2 73:10
96 (1) 111:10
99 (1) 111:12