

<p>1 Friday, 18 May 2018</p> <p>2</p> <p>3 Opening remarks by THE CHAIRMAN .....1</p> <p>4 Submissions by COUNSEL TO THE .....1</p> <p>5 INQUIRY</p> <p>6 Submissions on behalf of the .....8</p> <p>7 Metropolitan Police Service by</p> <p>8 MR HALL</p> <p>9 Submissions on behalf of the .....57</p> <p>10 Metropolitan Police Service</p> <p>11 Designated Lawyers by</p> <p>12 MR SANDERS</p> <p>13</p> <p>14 (10.30 am)</p> <p>15 Opening remarks by THE CHAIRMAN</p> <p>16 THE CHAIR: Can I begin by reminding everybody of the</p> <p>17 terms of the order which is always in place on these</p> <p>18 occasions.</p> <p>19 People are free to send out messages after a time</p> <p>20 lapse of two minutes, but they must not send out any</p> <p>21 message which contains something about which somebody</p> <p>22 has objected. We have not had such a situation arise so</p> <p>23 far, it might conceivably arise during the course of</p> <p>24 this hearing. If it does, I insist on strict compliance</p> <p>25 with the order.</p> <p>Thank you.</p> <p>Mr Barr?</p> <p>Submissions by COUNSEL TO THE INQUIRY</p> <p>MR BARR: Thank you, sir.</p> <p style="text-align: center;">Page 1</p>	<p>1 aspects of current procedures.</p> <p>2 The private meetings between members of the</p> <p>3 Inquiry's legal team and the legal representatives of</p> <p>4 non-state core participants and the public hearings held</p> <p>5 on applications for restriction orders in respect of the</p> <p>6 real and cover names of deployed undercover officers and</p> <p>7 their managers. I set out below what I believe to be</p> <p>8 uncontroversial facts about those events.</p> <p>9 On 8 March, the first of what I hope will be many</p> <p>10 private meetings between legal representatives and the</p> <p>11 Inquiry's legal team took place. I have read the</p> <p>12 detailed uncorrected notes made by the Inquiry's legal</p> <p>13 team of the meeting. They suggest to me that it was</p> <p>14 constructive and worthwhile.</p> <p>15 There was no mention of what was planned for the</p> <p>16 following day. The making of a prepared statement by</p> <p>17 Ms Kaufmann Queen's Counsel about the constitution of</p> <p>18 the Inquiry panel, followed by her departure and the</p> <p>19 departure of those for whom she appeared.</p> <p>20 On 9 May, the legal representatives did not appear</p> <p>21 at the open hearing. The Inquiry was advised in</p> <p>22 advance, written submissions were provided on</p> <p>23 8 May 2018.</p> <p>24 Peter Francis also wrote to the Inquiry to state</p> <p>25 that he would not anticipate in the determination of</p> <p style="text-align: center;">Page 3</p>
<p>1 I appear this morning with Ms Ailes, who sits to my</p> <p>2 right. To my left, Ms Kaufmann appears leading</p> <p>3 Ms Brander. To my right, Mr Hall leads Ms Mannion and</p> <p>4 Ms Lyons, appearing on behalf of the Metropolitan Police</p> <p>5 Service. To their right, Mr Sanders appears on behalf</p> <p>6 of the designated lawyers team leading Mr McAllister and</p> <p>7 Mr Bottomley. Behind me to my left, Ms Sikand appears</p> <p>8 on behalf of Peter Francis. Further to her left,</p> <p>9 Ms Steel appears in person.</p> <p>10 Two to Ms Sikand's right, Mr Ruis appears on behalf</p> <p>11 of the category M core participants. To his right,</p> <p>12 Mr Griffin leads Ms Davidson on behalf of the</p> <p>13 Home Office. To their right, the National Police</p> <p>14 Chiefs' Council are represented by Sir Robert Francis.</p> <p>15 That, I think, is everybody who has attended today</p> <p>16 in the capacity of advocate.</p> <p>17 Unless I can assist you further, those are the</p> <p>18 introductions.</p> <p>19 THE CHAIR: Thank you very much.</p> <p>20 Before we get down to the business of the day,</p> <p>21 I have a statement to make which was given in hard copy</p> <p>22 form to counsel shortly before I came into this room.</p> <p>23 The events of 8 and 9 March have caused me to seek</p> <p>24 to clarify the wishes and intentions of non-state core</p> <p>25 participants and their legal representatives about two</p> <p style="text-align: center;">Page 2</p>	<p>1 applications for restriction orders in respect of real</p> <p>2 and cover names.</p> <p>3 Non-police non-state legal representatives have made</p> <p>4 clear that they do not intend to make oral submissions</p> <p>5 at open hearings about applications for restriction</p> <p>6 orders in respect of real or cover names, but will</p> <p>7 continue to make written submissions.</p> <p>8 Given the position of the non-police non-state</p> <p>9 representatives, I will continue to invite written</p> <p>10 submissions from all core participants and will make</p> <p>11 decisions after they have been received. That is</p> <p>12 without an open oral hearing.</p> <p>13 The open hearings scheduled for 5 and 12 July will</p> <p>14 not take place.</p> <p>15 In my view, meetings between the Inquiry's legal</p> <p>16 team and its core participants' legal representatives</p> <p>17 are a valuable means of permitting the Inquiry to</p> <p>18 prepare for the hearings which will begin in June 2019,</p> <p>19 in particular such meetings ensure that the views of</p> <p>20 both state and non-police non-state core participants</p> <p>21 about the process of preparing for evidence hearings are</p> <p>22 taken into account. I hope that these meetings will</p> <p>23 continue. I invite them, that is to say the legal</p> <p>24 representatives of all participants, to confirm to the</p> <p>25 Inquiry by 4 pm on 4 June that they wish these meetings</p> <p style="text-align: center;">Page 4</p>

<p>1 to continue, or, if not, what they would propose to put 2 in their place. 3 In the early days of the Inquiry, the legal 4 representatives of a number of state and non-police 5 non-state core participants asked 6 Sir Christopher Pitchford to meet them and those they 7 represented at a private meeting. He declined to do so, 8 because as the finder of fact he had to be and be seen 9 to be impartial. 10 Soon after I was appointed chairman a similar 11 request was made to me, I declined it for the same 12 reason. 13 The invitation was recently re-extended by 14 representatives of the non-police non-state core 15 participants. I will accept it. Subject to conditions 16 whose purpose is to ensure that my impartiality is not 17 compromised. 18 They are. 19 The meeting will be attended only by non-state core 20 participants and their legal representatives. I will 21 rely on them to ensure that no other person attends. 22 What is said at the meeting will be recorded by the 23 Inquiry and by no one else. This is not for the 24 purposes of publication but to enable an accurate record 25 of the meeting to be kept by the Inquiry. There will be</p> <p style="text-align: center;">Page 5</p>	<p>1 that they might have to be redacted to some extent, but 2 from what I had seen from those that I know to exist 3 I did not anticipate any significant redactions. 4 She in turn told me that in her view the documents 5 that she had seen heavily redacted copies of before were 6 unlikely to be complete, and that she could provide to 7 me information or names and similar information which 8 would enable the Inquiry to search its documents to see 9 if there were other documents that could and should be 10 disclosed to her. 11 I undertook to do those things. 12 This, although I didn't realise it when I prepared 13 the written statement I have just made, was a practical 14 example of a private meeting with a non-state non-police 15 core participant working. I have learnt something and 16 what I learnt is that meetings of that kind, whether 17 with a significant number or on a one-to-one basis or 18 any variant on that are likely to be helpful to enable 19 me to understand the views of those whom I meet and to 20 enable me to explain to them what I am doing and to 21 invite their assistance. 22 Now, down to the business for which we are here, 23 which is how the Metropolitan Police in particular, but 24 other state representatives can assist the Inquiry -- 25 MS STEEL: Can I just make a quick correction to the</p> <p style="text-align: center;">Page 7</p>
<p>1 no still or video photography. 2 It is understood by those attending that I cannot 3 say anything which would compromise impartiality and may 4 therefore have to refuse to answer some questions. 5 I will offer a similar facility to former undercover 6 officers and their managers and if they are no longer 7 alive to their surviving immediate relatives if they 8 request it. 9 I invite a response from the legal representatives 10 by 4 pm on 4 June. If the response is positive the 11 Inquiry team will discuss with them the format of the 12 meeting or, if the numbers who wish to attend are so 13 large as to require more than one meeting. 14 This is not part of that statement, but a statement 15 of something that took place yesterday. 16 Yesterday, I met Sukhdev Reel and her family, her 17 legal representative, Mike Schwarz, her Member of 18 Parliament, John McDonnell and Suresh Grover who has 19 advised and assisted her over many years. Speaking for 20 myself, I found the meeting which lasted two hours 21 constructive and helpful. 22 In particular, it led to me undertaking to Ms Reel 23 that I would provide her, as soon as the Inquiry 24 reasonably could, with all of the documents that the 25 Inquiry has which relate to her. I explained to her</p> <p style="text-align: center;">Page 6</p>	<p>1 statement that you read? Because you said that 2 non-state non-legal representatives have made it clear 3 that they do not intend to make oral submissions at open 4 hearings about applications for restriction orders in 5 respect of real or cover names. 6 And actually what the position is that we feel we 7 can't meaningfully participate in those open hearings. It is 8 not that we don't want to. It is that we feel we can't 9 meaningfully participate because we don't have enough 10 information disclosed to us. So I would just like that 11 to be made clear. 12 THE CHAIR: Thank you. 13 Now down to the business of the day, which is to 14 give the opportunity for police and state 15 representatives to discuss with me on a forward looking 16 rather than a recriminatory basis how we can get from A 17 to B. I hold that I will be told what can be done on 18 your side to help me to do that and I invite you to say 19 what we can do on our side to help you to do it. We 20 will, I hope, discuss a number of practical problems. 21 I have invited this unusually for an open forum 22 because I think that the public are entitled to know 23 what is going on, at least in outline. 24 MR HALL: Indeed. 25 THE CHAIR: Even though, of course, there must be detailed</p> <p style="text-align: center;">Page 8</p>

<p>1 discussions about matters in private.                  2 Submissions on behalf of the Metropolitan Police Service by                  3 MR HALL                  4 MR HALL: Indeed.                  5 Sir, how can Metropolitan Police Service resources                  6 best be deployed to assist the Inquiry to fulfil its                  7 timetable?                  8 The short answer, and I am going to develop if                  9 I may, I have about six pages of notes to speak to, but                  10 the short answer is by giving the Metropolitan Police                  11 Service clearly defined projects and as soon as                  12 possible.                  13 For example, the Metropolitan Police Service would                  14 ask for as many witness statements to be getting on with                  15 and as many relevant and necessary documents to apply                  16 for restriction orders over, again as soon as possible.                  17 It is an enormous job of work, so we need to make                  18 a start. Beyond that it is too soon to say, because                  19 more information is needed from the Inquiry -- as I will                  20 go on to explain. That does take me right to the second                  21 issue, which is how the Inquiry can assist the                  22 Metropolitan Police Service to assist you. Again, the                  23 short answer is by talking ceaselessly to the                  24 Metropolitan Police Service about what its plans are, as                  25 in what your plans are. Being prepared to adjust and</p> <p style="text-align: center;">Page 9</p>	<p>1 tight.                  2 If there is proper engagement and consideration                  3 between the Metropolitan Police Service and the Inquiry,                  4 then the Inquiry can meet its deadlines. That is what                  5 the Metropolitan Police Service fervently wishes and the                  6 points I am going to make in a moment are all of those                  7 in that spirit, looking forward to working with the                  8 Inquiry to meet its ambitious target as we all want.                  9 Sir, the Metropolitan Police Service has written                  10 a detailed letter to your secretariat on Tuesday. I am                  11 not going to go through that letter, but it may be                  12 interesting to those who are here to get a flavour of                  13 the sort of practical issues that we have raised with                  14 you in correspondence.                  15 Can I start with information technology. Precisely                  16 what information technology system or systems the                  17 Inquiry is going to use to communicate sensitive                  18 documents with the Metropolitan Police Service is                  19 a really, really crucial issue. The Metropolitan Police                  20 Service has reluctantly come to the view that something                  21 called the Res Tool which is a bespoke piece of software                  22 that was developed for use by the Metropolitan Police                  23 Service and the Inquiry to deal with the redactions                  24 process and which has been the subject of continued                  25 testing by the respective technical teams of the Inquiry</p> <p style="text-align: center;">Page 11</p>
<p>1 refine the Inquiry's approach in the light of what                  2 works.                  3 The Metropolitan Police Service has a shared                  4 interest, as I suspect all the core participants do with                  5 the Inquiry, in helping you conclude modules 1 and 2 by                  6 September 2021, and providing the final report by                  7 December 2023. I'm going to be asking for maximum                  8 engagement from the Inquiry team and my submissions are                  9 going to be completely forward looking.                  10 We really appreciate -- double underlined -- the                  11 seriously increased level of engagement that has just                  12 started. There are intensely practical aspects to this                  13 Inquiry which need to be addressed. The machinery of                  14 getting evidence disclosed and witnesses heard is so                  15 complex that unless the Inquiry engages in an open                  16 fashion with the Metropolitan Police Service at every                  17 stage, crucial aspects of the process will just not be                  18 picked up by the Inquiry's planners or the Inquiry's                  19 lawyers. This is an urgent matter. The timescales are                  20 so tight that the Metropolitan Police Service should be                  21 liberated by the Inquiry to start work now and the                  22 timescales are also so tight that the Inquiry must try                  23 to look around every corner to see what practical                  24 difficulties could say have an impact on the timetable.                  25 I say any impact, because the timescales are so</p> <p style="text-align: center;">Page 10</p>	<p>1 and the Metropolitan Police Service simply lacks the                  2 required stability. Our view reluctantly is the nettle                  3 must be grasped and any assumptions based upon the use                  4 of the Res Tool must be reconsidered without delay.                  5 This of necessity means that the Inquiry cannot, we                  6 suggest, wait a moment longer to start making decisions                  7 on the restriction order applications that have already                  8 been made --                  9 THE CHAIR: I agree with that point. I think, so that                  10 everyone can understand it, the Res Tool was intended to                  11 permit the Metropolitan Police Service on one side and                  12 the Inquiry on the other to view the same document on                  13 a computer screen in their own offices and for                  14 a redaction or alteration to be made on one screen which                  15 would be replicated precisely on the other. It has not                  16 worked.                  17 MR HALL: Sir, I am grateful. Absolutely.                  18 The other key current information technology issue,                  19 and I make no apologise for descending to this level of                  20 detail, because these are the practical matters that                  21 will make the Inquiry flow --                  22 THE CHAIR: Of course.                  23 MR HALL: -- is the question of document splitting. The                  24 Metropolitan Police Service needs to properly discuss,                  25 understand, what the Inquiry's expectations are about</p> <p style="text-align: center;">Page 12</p>

1 electronic splitting of documents that have previously  
 2 been provided to the Inquiry. We also need to  
 3 understand expectations about metadata, what they are --  
 4 THE CHAIR: Could we just take them one by one?  
 5 MR HALL: Yes.  
 6 THE CHAIR: This may be more helpful than you making  
 7 a speech and then me responding to it, because we may  
 8 omit things if we do it that way.  
 9 MR HALL: Yes.  
 10 THE CHAIR: Document splitting is, I think so everybody  
 11 understands it, when a document is provided by the  
 12 Metropolitan Police Service to the Inquiry which  
 13 contains, let us say, 200 pages, and a whole raft of  
 14 different types of document within it. It is in effect  
 15 a file.  
 16 To be usable by either side it has to be broken down  
 17 into individual documents within the file. This is  
 18 a problem that has been bedevilling both sides for  
 19 a long time. Each side, I think, has its preferred  
 20 solution which is essentially you do it and then you  
 21 give us the result.  
 22 MR HALL: In relation to previously uploaded documents.  
 23 I think the Metropolitan Police Service for future  
 24 documents will be splitting them. We are talking about  
 25 that cohort of documents that were previously uploaded,

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1 but of course there are very many of them so the work to  
 2 know to be done is enormous.  
 3 THE CHAIR: Of course. I am very glad to hear the proposal  
 4 for future file documents, that will simplify matters  
 5 greatly. But there is, as you acknowledge, a historical  
 6 problem which has to be resolved to permit us to make  
 7 progress. You and I probably understand insufficient to  
 8 be able to come up with a sensible solution. What  
 9 I propose is that each of us appoints one person --  
 10 I have identified someone on our side to do it -- to be  
 11 responsible for solving this problem.  
 12 We have had exchanges of correspondence, large-ish  
 13 groups discussing it all and have reached nowhere.  
 14 MR HALL: Yes.  
 15 THE CHAIR: What I propose is that you nominate somebody,  
 16 I nominate somebody, and between them we put them in  
 17 a room with a cold towel and say, "Arrive at  
 18 a solution".  
 19 MR HALL: I think our view is that it has to be both  
 20 a counsel type of person and a planner type of person.  
 21 Because our view is that the information technology  
 22 feeds so much into the legal process that someone who is  
 23 engaged in the legal side, we would suggest at quite  
 24 a senior level, needs to get the information technology  
 25 issues. Of course they are not going to be experts --

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1 THE CHAIR: I have in mind our senior paralegal, who is  
 2 thoroughly expert both in the information technology  
 3 side of things and in the legal issues that arise. Not  
 4 at the level of abstraction that counsel would be  
 5 expected to involve themselves in, but in the practical  
 6 side of things.  
 7 MR HALL: I respectfully disagree. I suggest that counsel  
 8 should be directly involved. I am going to nominate  
 9 someone who is a reasonably senior member of my counsel  
 10 team to get to grips with the information technology.  
 11 We don't think it is something that you can split off  
 12 and feed in.  
 13 THE CHAIR: We must think about that and come back to you on  
 14 that. I hope we can do that today.  
 15 MR HALL: Of course.  
 16 THE CHAIR: But I will need to discuss privately with my  
 17 team before we can come back --  
 18 MR HALL: Before someone gets saddled with it, yes.  
 19 THE CHAIR: Exactly. Just let me make a note of that.  
 20 What you are in effect proposing is a two-man team  
 21 or two-person team on each side?  
 22 MR HALL: Yes.  
 23 Yes, as Ms Mannion says, also someone with  
 24 sufficient seniority and leadership to make real  
 25 decisions and to influence the course of the Inquiry as

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1 a whole. For example, if they detect that there is  
 2 an insuperable problem, being able to ensure that the  
 3 whole Inquiry sits up and says, "Okay, we cannot proceed  
 4 on the basis that there will be this pool of split  
 5 documents", or, for example, to persuade you, sir, that  
 6 perhaps one might split -- this is the technical side of  
 7 it -- documents 3 ways rather than 100 ways, which  
 8 I gather is possible.  
 9 THE CHAIR: That, I am afraid, is a level of technical  
 10 detail which is well beyond me. But if I need to,  
 11 I will get down to it and will grasp it, but I am hoping  
 12 that people who know more about this, in small numbers  
 13 rather than large groups, can in short order resolve it.  
 14 MR HALL: I entirely -- yes. But we deliberately in our  
 15 letter did invite everyone in the Inquiry, including  
 16 you, sir, and counsel to educate themselves in the  
 17 information technology systems because we regard it as  
 18 so fundamental. I have sought to educate myself in it.  
 19 It is not impossible, but it is fundamental.  
 20 THE CHAIR: I am fortunate in having people who know what  
 21 they are doing there, and I can rely on them. But  
 22 I hear what you say. I take your point and I may need  
 23 a crash programme.  
 24 MR HALL: Sir, I think the next thing I mentioned was  
 25 metadata.

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<p>1 THE CHAIR: Yes.</p> <p>2 MR HALL: It is the same problem and I suggest it is dealt</p> <p>3 with in the same way.</p> <p>4 THE CHAIR: Yes. This is an historic problem rather than</p> <p>5 a --</p> <p>6 MR HALL: I'm not sure about that. On this one I'm on</p> <p>7 shakier ground, I had a crash course in splitting but</p> <p>8 not in metadata.</p> <p>9 Sir, moving on now to the next aspect. Having dealt</p> <p>10 with the information technology but really emphasising</p> <p>11 how important the information technology issue is, could</p> <p>12 we ask the Inquiry, please, to consider in detail and</p> <p>13 practically what is involved in the most difficult</p> <p>14 cases. I take, for example, the case of a former</p> <p>15 officer who is currently overseas who is not</p> <p>16 represented.</p> <p>17 In order for them to make a witness statement,</p> <p>18 potentially large numbers of sensitive documents are</p> <p>19 going to need to be communicated to that person. That</p> <p>20 person is going to have to have sufficient but secure</p> <p>21 access to those documents, and may need to have</p> <p>22 assistance or even help from the Inquiry direct, if they</p> <p>23 are not represented.</p> <p>24 We would ask you to sit down not looking at the</p> <p>25 early Vietnam Solidarity Campaign officers, who are to</p> <p style="text-align: center;">Page 17</p>	<p>1 made on module 2 in advance of some progress on</p> <p>2 module 1. I wholly agree and I'm not suggesting we do</p> <p>3 everything in strict chronological order, we should do</p> <p>4 what we can, when we do it.</p> <p>5 MR HALL: I am grateful.</p> <p>6 Sir, the next topic is to think about the hard</p> <p>7 questions. For example, what is the position if</p> <p>8 allegations are made against former officers by members</p> <p>9 of the public after those officers have completed their</p> <p>10 witness statement? Will they have a chance,</p> <p>11 procedurally, to file a response before the oral hearing</p> <p>12 and what happens -- forgive me for posing rhetorical</p> <p>13 questions these are the sort of practical things we need</p> <p>14 to think about -- if a conflict emerges so they can no</p> <p>15 longer be represented by the designated lawyer, which</p> <p>16 those in court may know is the Metropolitan Police</p> <p>17 Service funded but independent legal team who represent</p> <p>18 officers who could not be given proper legal</p> <p>19 representation by the commissioner's team who</p> <p>20 I represent.</p> <p>21 It is possible that conflicts may emerge late in the</p> <p>22 piece and we need to think about that, because they</p> <p>23 would need to go to someone else. There is the same</p> <p>24 issue about documentation, et cetera, et cetera.</p> <p>25 Are they, developing the same theme, going to find</p> <p style="text-align: center;">Page 19</p>
<p>1 some extent more straightforward, but immediately</p> <p>2 looking at the problems caused by those really difficult</p> <p>3 officers and factor that in. Because if there is</p> <p>4 a solution to that, it is probably a complicated one and</p> <p>5 it is something that we need to get on with as soon as</p> <p>6 possible.</p> <p>7 THE CHAIR: If we are going to do that, we will need names.</p> <p>8 I mean I know some of them, but I don't claim to be able</p> <p>9 to reel off the top of my head every single one of them</p> <p>10 at the moment. But we will need names if that is to be</p> <p>11 done.</p> <p>12 I don't, however, want particular problems of that</p> <p>13 kind to prevent progress being made on the great bulk of</p> <p>14 officers where those problems don't occur.</p> <p>15 MR HALL: Absolutely.</p> <p>16 THE CHAIR: Bluntly, if we cannot get evidence from officers</p> <p>17 X and Y who may be in distant continents and who are not</p> <p>18 represented, then tant pis, we just can't.</p> <p>19 MR HALL: I agree, and to develop the point that you raised</p> <p>20 entirely agree about not having a stage 1 -- we must</p> <p>21 finish stage 1 before we get to the stage 2 process.</p> <p>22 Our plea is for the Inquiry to work on strands in</p> <p>23 parallel.</p> <p>24 THE CHAIR: I entirely agree. We are absolutely ad idem</p> <p>25 there. I know that a great deal of progress has been</p> <p style="text-align: center;">Page 18</p>	<p>1 out about allegations against them only when they get</p> <p>2 the hearing bundle? I assume not. I assume that the</p> <p>3 Inquiry would say, well, if a serious allegation has</p> <p>4 been made, they should have some advance notice of it as</p> <p>5 a matter of fairness. Has that been planned into the</p> <p>6 timescales and charts?</p> <p>7 THE CHAIR: The answer is that it is not an issue which has</p> <p>8 been specifically thought about or addressed. We do</p> <p>9 need to think about it. I cannot give you an</p> <p>10 instantaneous response to that. My strong suspicion is</p> <p>11 that we will have to wait and see what happens and deal</p> <p>12 with it then.</p> <p>13 MR HALL: Yes.</p> <p>14 THE CHAIR: I agree we need to think about how we will deal</p> <p>15 with it beforehand, but this problem can arise in</p> <p>16 a variety of guises and it will not be the only --</p> <p>17 MR HALL: No.</p> <p>18 THE CHAIR: -- lump in the road which sends us off course or</p> <p>19 has the capacity to do so.</p> <p>20 MR HALL: I agree. There is not necessarily a right or</p> <p>21 wrong answer, and certainly not in the abstract, but it</p> <p>22 is worth thinking about these things and trying to tease</p> <p>23 them out and identify them if we can.</p> <p>24 THE CHAIR: I wholeheartedly agree, but I am afraid I have</p> <p>25 become convinced that dealing with problems in the</p> <p style="text-align: center;">Page 20</p>

<p>1 advance in the abstract is not the right way forward.                  2 We have to deal with things in the light of experience,                  3 in the light of the facts that exist.                  4 MR HALL: Absolutely. I absolutely agree with that. Which                  5 is why the idea of working in parallel and getting these                  6 problems in concrete form before one is better than                  7 waiting.                  8 So, for example, if one has a cadre of officers it                  9 may be against whom one can anticipate allegations being                  10 made, get those witness statements out. Find out what                  11 allegations are going to be made by members of the                  12 public, potentially put out a call for evidence from                  13 members of the public who are now aware of the cover                  14 identities. Get those matters as a matter of concrete                  15 reality on the table and then try to solve them.                  16 THE CHAIR: Yes. We do know in advance that there are                  17 a number of former undercover officers whose activities                  18 are of great interest to a large number of people.                  19 MR HALL: Indeed.                  20 THE CHAIR: They, fortunately, at least some of the more                  21 prominent of them, their files have already been                  22 searched and you are right, we may well be in a position                  23 to embark upon them not in strict chronological order                  24 but in advance.                  25 MR HALL: I'm grateful.</p> <p style="text-align: center;">Page 21</p>	<p>1 that, let's get that in track now. It will help                  2 understand the numbers and again it will resolve certain                  3 issues.                  4 THE CHAIR: As far as those who are not able to give                  5 evidence, they, I think, self-identify and we have                  6 received medical evidence in, I think, in the case of                  7 the Metropolitan Police Service in all cases where that                  8 situation arises. It is not the case in all cases                  9 overall. I can think of one where it does not, but it                  10 doesn't concern you.                  11 MR HALL: Right.                  12 THE CHAIR: I don't think there is any utility in working                  13 out in advance and essentially in the abstract how many                  14 officers are likely to be called, who they might be, how                  15 many are not going to be called, who they might be,                  16 until I know whether or not there are significant issues                  17 of fact in relation to them which need to be explored,                  18 if they can be, in oral evidence.                  19 That, I think, depends upon going through the                  20 process of obtaining witness statements from them,                  21 submitting them to the non-state non-police legal                  22 representatives, and seeing what, if any, significant                  23 issues of fact there are.                  24 MR HALL: Yes, I mean of course, because one wants to know                  25 if there are issues of fact. But if there are witnesses</p> <p style="text-align: center;">Page 23</p>
<p>1 Sir, the Metropolitan Police Service has a really                  2 practical issue planning for -- which we will -- those                  3 officers who are going to give live evidence. Plans                  4 will have to be made, protective arrangements dealing                  5 with transport, accommodation and hearing in the court.                  6 As, sir, you will know those sorts of behind-the-scenes                  7 arrangements require a lot of thought.                  8 We will ask the Inquiry -- I know it is difficult to                  9 give any sort of precise figures -- to provide a good                  10 estimate about the number of officers who are going to                  11 be giving evidence live. When you make decisions on                  12 those witnesses who will be giving evidence live, please                  13 take account of their age, their health, their location                  14 and of course their wellbeing.                  15 Are there, we wonder, any officers who even now the                  16 Inquiry can say it will not need to call? It seems                  17 sensible and fair if the Inquiry already -- I think it                  18 has been indicated with one or two officers that you are                  19 not going to call, to make those decisions now.                  20 Similarly, if there are in fact officers who are not                  21 able to make witness statements -- I think, sir, that is                  22 the phrase you have used, "Every witness who is able".                  23 If one can already identify those who are not able or                  24 people who have alleged that they are not able but the                  25 Inquiry says we need some medical evidence to establish</p> <p style="text-align: center;">Page 22</p>	<p>1 who say they are unable to even make a statement -- and                  2 I think there are some --                  3 THE CHAIR: Then it is perfectly obvious they will not be                  4 called to give oral evidence, bluntly you don't need me                  5 to tell you.                  6 MR HALL: No, no, of course, but also relieve them of                  7 knowing that they may be called upon to make a witness                  8 statement.                  9 THE CHAIR: What you want the Inquiry to do is when all the                  10 anonymity processes have been finished, to look at those                  11 cases in which one or other degree of anonymity has been                  12 granted on health grounds --                  13 MR HALL: Yes.                  14 THE CHAIR: -- or infirmity grounds, and indicate to them                  15 that they will not be required to give oral evidence?                  16 MR HALL: Or a witness statement, as the case may be. Some                  17 will be able to do one and not the other. Yes.                  18 THE CHAIR: As regards those who are unable to provide                  19 a witness statement who are alive, I think they have                  20 been identified so far in the minded to notes and                  21 rulings.                  22 MR HALL: Right. I am just conscious there are some                  23 officers who have had very serious strokes who will not                  24 be making witness statements one imagines and they                  25 should be put out of the concern and the worry that they</p> <p style="text-align: center;">Page 24</p>

1 are going to have to go through some enormous process --  
 2 THE CHAIR: That is not a difficult process. I can simply  
 3 go back and look at the minded to notes and rulings and  
 4 see in the handful of cases -- because it is only  
 5 a handful --  
 6 MR HALL: It is only a small number.  
 7 THE CHAIR: -- where it simply is not going to be sensible  
 8 to approach them to obtain a witness statement. I can  
 9 do that.  
 10 MR HALL: I am grateful.  
 11 THE CHAIR: As regards those who will not be required to  
 12 give evidence, I am afraid that is something that must  
 13 await developments.  
 14 MR HALL: Understood.  
 15 The next topic concerns Inquiry counsel coming to  
 16 Metropolitan Police Service buildings to work, or rather  
 17 to have facilities made available to them to work. I am  
 18 thinking in particular about the redaction/restriction  
 19 order process. As you know, sir, the process of  
 20 transporting large numbers of sensitive documents is  
 21 incredibly time-consuming and resource -- and it delays  
 22 the process. You have to wait for a disc to be taken by  
 23 two security officers from the Metropolitan Police  
 24 Service's building to your facility and look at it,  
 25 et cetera, et cetera.

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1 It would not, we suggest, compromise anyone's  
 2 independence for counsel to the Inquiry to come and work  
 3 on restriction applications at the Metropolitan Police  
 4 Service building and they could, for example -- I am  
 5 sure this is exactly how it will happen -- go through  
 6 the Metropolitan Police Service application, some of  
 7 those they would accept, some of those they would query,  
 8 some of those they would form a firm view were wrong.  
 9 What normally happens is they speak to Metropolitan  
 10 Police Service counsel and then a debate takes place.  
 11 Quite often common ground is reached and then one  
 12 isolates those matters which will need to be resolved by  
 13 you.  
 14 If that can happen at the Metropolitan Police  
 15 Service building one cuts out a huge amount of delay and  
 16 resource intensive transportation of documents.  
 17 THE CHAIR: I will have to ask my counsel team about that.  
 18 I can't give you answer off the top of my head.  
 19 MR HALL: I would invite you to direct it.  
 20 THE CHAIR: No. I need to ask them first whether there are  
 21 any difficulties with it.  
 22 MR HALL: We can see none.  
 23 THE CHAIR: Fine. That is one of the issues I must discuss  
 24 with them and we will resolve, I hope, later on today.  
 25 MR HALL: I am grateful. I mean, I suppose I'm trying to

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1 indicate that we regard that as a really sensible  
 2 straightforward step. In particular with the Res  
 3 Tool --  
 4 THE CHAIR: Of course, the inability to use the information  
 5 technology to perform that function at two separate  
 6 locations simultaneously means that the mountain will  
 7 have to move to Mohammed.  
 8 MR HALL: Thank you.  
 9 THE CHAIR: But whether it is you to us or we to you,  
 10 remains to be seen.  
 11 MR HALL: Very good.  
 12 I also ought to say that we would invite the  
 13 Inquiry -- there will always be a huge amount of  
 14 transportation of sensitive documents in any event -- to  
 15 consider providing its own secure courier system. At  
 16 the moment the Metropolitan Police Service I understand  
 17 is doing an awful lot of it, and it takes people out of  
 18 their work and it may be that the Inquiry can provide  
 19 its own couriers.  
 20 THE CHAIR: This is a problem for both sides.  
 21 MR HALL: Yes.  
 22 THE CHAIR: As with many of these problems, inviting the  
 23 other side to do it is saving resources of the one side  
 24 but imposing a burden on the other.  
 25 MR HALL: Yes, a shared burden.

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1 Sir, the next topic is to ask the Inquiry to ask  
 2 hard questions of itself about the process for  
 3 restriction order applications on the basis of privacy.  
 4 I assume -- I don't know -- that that model is going to  
 5 be pursued. But that clearly has enormous resource and  
 6 time implications.  
 7 THE CHAIR: It does. If you read the protocol carefully,  
 8 I think you can see that there are permissible ways  
 9 around, provided that we comply with the general data  
 10 protection regulation.  
 11 MR HALL: Yes. Gosh. Is that a serious road block?  
 12 THE CHAIR: I don't believe it is, but it would be, for  
 13 example, if the data protection bill currently in the  
 14 Lords, I think, for the second or third time, isn't in  
 15 force on 25 May. Because we, as an Inquiry, will if my  
 16 understanding of the regulation is right, need express  
 17 domestic statutory permission to do certain things.  
 18 MR HALL: Right. Right.  
 19 THE CHAIR: It looks as though the bill is going to be  
 20 enacted in time --  
 21 MR HALL: Yes.  
 22 THE CHAIR: -- and I think everybody is proceeding on the  
 23 basis that it is.  
 24 MR HALL: Right. I am grateful. But as the Rehabilitation  
 25 of Offenders Act issue demonstrates, sometimes an

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1 inquiry is actually dependent upon legislation.  
 2 THE CHAIR: This time the legislation is going through  
 3 Parliament, the only query, and I sincerely hope it will  
 4 be resolved, is whether or not its coming into force is  
 5 delayed as a result of issues which are nothing  
 6 whatsoever to do with data protection but are all to do  
 7 with other matters --  
 8 MR HALL: Other matters.  
 9 THE CHAIR: -- about which I say nothing further.  
 10 MR HALL: No.  
 11 May I ask whether the Rehabilitation of Offenders  
 12 Act matter will be dealt with in time for that part of  
 13 the hearing, or certain --  
 14 THE CHAIR: I don't know. But the more I have learnt about  
 15 the facts, the smaller that problem appears to be. This  
 16 is one of those questions which were deeply  
 17 interestingly legally, no doubt, but I do doubt now will  
 18 have a great deal of impact. It has not had on the  
 19 anonymity process so far, for reasons that I have  
 20 explained.  
 21 MR HALL: Indeed. I completely understand why that may well  
 22 be the case, but of course the provisional view that  
 23 I share with you, sir, may not be shared by anyone.  
 24 THE CHAIR: No, I know.  
 25 MR HALL: And if an officer wanted to refer to a spent

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1 conviction of a person who was accusing him of doing  
 2 unnecessary acts, then the issue is going to have to be  
 3 resolved.  
 4 THE CHAIR: It may have to be. But I don't control the  
 5 parliamentary timetable or even the executive presenting  
 6 secondary legislation to Parliament. That is entirely  
 7 out of my hands. I can make recommendations, as I have  
 8 done, and ask that things are done, but that is all  
 9 I can do.  
 10 MR HALL: I am grateful for that. That just seems  
 11 another -- there does need to be contingency planning to  
 12 deal with --  
 13 THE CHAIR: I am not minded to engage in contingency  
 14 planning for contingencies that, (a), I don't believe  
 15 will occur, and (b) may not have quite the impact on the  
 16 Inquiry process that in theory they could have.  
 17 If push comes to shove, I may simply have to make  
 18 a decision and hope it is legally sound.  
 19 MR HALL: Yes. There was a bit of wriggle room.  
 20 THE CHAIR: Yes.  
 21 MR HALL: I am grateful. Forgive me, I am dealing with  
 22 quite a lot of what for us are fairly crunchy issues.  
 23 This is about IMOS.  
 24 THE CHAIR: This is a crunchy issue and I invite you to say  
 25 what you want to about it.

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1 MR HALL: IMOS, which is the Special Branch database which  
 2 captures the intelligence generated by the officers --  
 3 I know, sir, that you are interested in knowing what use  
 4 was made of intelligence obtained or gathered by  
 5 officers --  
 6 THE CHAIR: Well, it is not just that which is distributed,  
 7 it is that which is received.  
 8 MR HALL: Indeed.  
 9 THE CHAIR: It gives us the raw intelligence that they were  
 10 reporting and what was done with that.  
 11 MR HALL: And what was done with it.  
 12 THE CHAIR: Yes.  
 13 MR HALL: Sir, as you will also know, it is not as  
 14 straightforward as typing a search term into Google.  
 15 THE CHAIR: No.  
 16 MR HALL: My request is that you dedicate counsel to the  
 17 IMOS task. So people who can become genuinely  
 18 knowledgeable about the IMOS process. I say that  
 19 because IMOS Metropolitan Police Service staff have been  
 20 very, very appreciative of your counsel when they have  
 21 become experts and when they have been able to come for  
 22 a number of days per week, it has gone much better than  
 23 when one has had a change of counsel. So that is our  
 24 first request.  
 25 THE CHAIR: Can I say by explanation something that possibly

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1 you do know but you may not, that one of the two counsel  
 2 who have been used to deploying to IMOS is a New  
 3 Zealand -- sorry, not a New Zealander, she has married  
 4 a New Zealander and has gone with him, I think, to New  
 5 Zealand --  
 6 MR HALL: I do know that.  
 7 THE CHAIR: -- so we have lost invaluable help.  
 8 We do have two counsel who are becoming expert in  
 9 IMOS. I wholeheartedly agree with you. It works much  
 10 better when we have people who know what they are doing  
 11 on both sides.  
 12 MR HALL: Of course. For our part, we are increasing the  
 13 officer capacity at IMOS to deal with the Inquiry's  
 14 expectations.  
 15 THE CHAIR: Yes.  
 16 MR HALL: That said, I do know that there is just a source  
 17 of frustration about the speed. I think we are going to  
 18 have to -- both sides are going to have to both sides is  
 19 the wrong way of putting it --  
 20 THE CHAIR: I know what you mean.  
 21 MR HALL: -- but the Inquiry and the Metropolitan Police  
 22 Service will continually need to speak and sort it out.  
 23 THE CHAIR: I would like to be a little more concrete than  
 24 that.  
 25 According to some back-of-envelope figures, but they

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1 are well founded, that I have been shown, we have about  
2 70 officers whose records on IMOS and deployments we  
3 need to look at between now and December. The current  
4 throughput is 2.5 officers per month. That needs to be  
5 stepped up, accelerated, rapidly. It requires first  
6 more resources, which you helpfully tell me are in place  
7 and which I hope that we can put in place on our side,  
8 and, secondly, efficiencies. I would like to discuss  
9 those with you, if I may.  
10 MR HALL: Yes.  
11 THE CHAIR: Again, if you need time to take instructions  
12 about these and respond when you have done so, please  
13 say so.  
14 MR HALL: I probably will.  
15 THE CHAIR: The journey from making a request by us to  
16 having the documents provided by you to us is a lengthy  
17 one and it contains steps which I think could be  
18 productively removed.  
19 I have been given four examples. I don't for one  
20 moment think that you will have them at the top of your  
21 head, but they concern HN321, HN339, HN329 and HN68.  
22 They show that the journey from search request to  
23 your responses to that, the rule 9 request that is  
24 eventually generated by it, varies from 15 weeks, which  
25 is the shortest, to 43 weeks which is the longest.

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1 Within each of those periods there is a period of on  
2 average 7.5 weeks. On some instances it is 7, in some  
3 it is eight, between the search report being produced by  
4 IMOS and the report being made available to us.  
5 The understanding that I have is that is because on  
6 your side it is loaded on to HOLMES, and then after  
7 a gap which can be as long as a month because the  
8 further uploading only takes place once a month, is then  
9 loaded on to Relativity, and then becomes accessible to  
10 us. It may also be the subject of some internal reviews  
11 during that time.  
12 I, for my part, do not see why any of that needs to  
13 be done. I don't understand why it can't be loaded  
14 straight on to Relativity and if you need to load it on  
15 to HOLMES, do so later.  
16 MR HALL: It is a very respectable question and I will need  
17 to take instructions, but yes.  
18 THE CHAIR: Of course. It is that sort of thing which  
19 I think might speed matters up.  
20 We suspect that there may be some delay produced by  
21 reviews of the documents before they are shown to us.  
22 I can't see the need for that.  
23 MR HALL: I was not actually aware of that.  
24 THE CHAIR: No.  
25 MR HALL: We will deal with that quickly.

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1 THE CHAIR: Yes. In the crudest simplification, what could  
2 happen is that Counsel to the Inquiry could go to IMOS,  
3 identify the documents that they want there, photocopy  
4 them, provide the photocopies to the Metropolitan Police  
5 Service Commissioner's lawyer or designated lawyer teams  
6 as appropriate and bring them back. That would cut out  
7 a good deal of this.  
8 MR HALL: Yes. We have thought about that. There is  
9 a temptation on the Metropolitan Police Service side to  
10 say to counsel, "You have a go", because it is actually  
11 quite difficult. I am not sure that model is going to  
12 work, but we will look at it.  
13 The only reservation is it is a highly sensitive  
14 environment. I don't want to say too much about it --  
15 THE CHAIR: No.  
16 MR HALL: -- but any efficiencies -- what we have learnt is  
17 that you are very interested in what will come out of  
18 IMOS and it is clearly a pinch point we are going to  
19 have to work at. I don't think I can say any more about  
20 that, but I have noted -- or Ms Mannion has noted -- all  
21 your questions.  
22 THE CHAIR: Again, I am going to propose, once you respond  
23 to my suggestion that you take instructions on it, that  
24 we appoint on each side -- I was going to say one  
25 person, I think would probably suffice in this

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1 instance -- to get to the bottom of this and agree  
2 a solution.  
3 MR HALL: Agreed.  
4 THE CHAIR: I have counsel who doesn't yet know that I am  
5 proposing her to do it, but I am sure that she will  
6 accept the responsibility --  
7 MR HALL: Gratefully accept it. Yes.  
8 THE CHAIR: -- and discharge it effectively.  
9 MR HALL: Sir, I am not going to respond to your questions  
10 on my feet or even today.  
11 THE CHAIR: Of course. I hope you will be able to respond  
12 to some extent to me today. And in particular about  
13 that proposal, because I think that is probably --  
14 MR HALL: About the --  
15 THE CHAIR: Proposal to appoint one person on each side --  
16 MR HALL: I can say yes, now, on my feet absolutely.  
17 Agreed.  
18 THE CHAIR: Good.  
19 MR HALL: The next topic is the question of numbers. We  
20 would like to talk constantly about numbers. We have  
21 done a back-of-an-envelope estimate, as I am sure you  
22 are doing constantly, in relation to Robert Lambert.  
23 Theoretically there are 118,000 pages of documents which  
24 are relevant to Robert Lambert. Our estimate is that  
25 would, if a line-by-line redaction process was required,

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1 and I can see it might be, take 20 counsel 98 working  
2 days to redact.  
3 THE CHAIR: I have read your figures. I don't claim to have  
4 got completely to the bottom of the numbers of documents  
5 that we are actually going to have to deal with. But  
6 I know that you did start out with 700,000-odd and  
7 I believe, on the basis of the information that I have  
8 been given, that that is going to come down to about  
9 a seventh.  
10 MR HALL: Documents or pages? I am referring to pages, but  
11 of course documents will often have many pages.  
12 THE CHAIR: Some documents have many pages, some have one,  
13 some documents you can read in a minute, some take half  
14 an hour --  
15 MR HALL: Sir, I am referring to pages.  
16 THE CHAIR: Fine. Both the Metropolitan Police Service and  
17 the National Police Chiefs' Council have at an early  
18 stage in the Inquiry -- I'm not recriminating here but  
19 explaining the background -- said that there are an  
20 extraordinary number of documents which the Inquiry will  
21 have to consider. We have analysed those that we have  
22 received and found that actually an awful lot of them  
23 can simply be binned. They are not of any interest to  
24 the Inquiry even potentially.  
25 The best estimate that we have at the moment is that

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1 we might need about 100,000.  
2 MR HALL: Right.  
3 THE CHAIR: That figure will require refinement, I don't  
4 doubt.  
5 MR HALL: Is that 100,000 documents?  
6 THE CHAIR: Yes.  
7 MR HALL: That is about half a million pages.  
8 THE CHAIR: My suspicion is that will come down quite a lot.  
9 MR HALL: It is half a million pages, that is enormous.  
10 THE CHAIR: It is a lot. We are going to in this debate  
11 move on to the redaction process, about which you will  
12 have something to say and I will have something to say.  
13 MR HALL: I will. The question of scale takes me to this  
14 point, if I may, quickly. We assume that the Inquiry  
15 intends to go very deeply into particular deployments?  
16 THE CHAIR: Yes.  
17 MR HALL: That that will, inevitably, create a burden in  
18 what I will call preparing the documents, sending to the  
19 officer, any affected non-state core participants, to  
20 the public, bundles et cetera.  
21 We would invite the Inquiry to consider making  
22 serious adjustments in relation to less controversial  
23 deployments. The Inquiry must now know from the  
24 anonymity process which officers are not controversial  
25 and the Inquiry, it seems to us, if one is going to

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1 realistically achieve the timetable it is going to have  
2 to make quite quick hard decisions about how deeply it  
3 will go into other deployments.  
4 THE CHAIR: I don't agree with that.  
5 Sir Christopher Pitchford said he was going to go  
6 into every deployment. Not every bit of reporting but  
7 every deployment. Each officer was, where possible,  
8 going to be investigated on an officer-by-officer  
9 basis --  
10 MR HALL: I am not trying to refight that fight. I see very  
11 clearly from the foreword that there is one thing which  
12 is set in stone. You want to go chronologically through  
13 the history of the Special Demonstration Squad and take  
14 statements from every officer who is able to.  
15 I understand that.  
16 THE CHAIR: Yes.  
17 MR HALL: There is flexibility, we suggest, in relation to  
18 the number of documents that enter the process in  
19 relation to each witness. Some witnesses will clearly  
20 need a vast number of documents. What I am suggesting  
21 is some witnesses will not need anything like -- when  
22 I say "anything like", one could maybe have no documents  
23 to do with a large document. One takes a witness  
24 statement but not documents.  
25 Those are the sorts of decisions we would invite the

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1 Inquiry to make. Otherwise, if it is tens of thousands  
2 or 1,000, which I think we recently had in relation to  
3 the first Vietnam Solidarity Campaign witness, it is  
4 going to be --  
5 THE CHAIR: You have seen a copy of the request made,  
6 I hope.  
7 MR HALL: Yes.  
8 THE CHAIR: That was provided for your information so that  
9 we could debate matters so that you knew what we were  
10 intending to ask.  
11 MR HALL: It was very helpful, thank you.  
12 THE CHAIR: I, at first blush, was surprised by the detailed  
13 extent of the questions that were asked of him, but  
14 I was reassured that because he is one of the very few  
15 people still alive able to give us detailed evidence  
16 about the Vietnam Solidarity Campaign infiltration, that  
17 we were going to ask him a lot of questions to ensure  
18 that we understood the other documents the better.  
19 That is not to be taken as a template for what every  
20 officer will be asked, I agree it would impose an  
21 intolerable burden on everybody if that were to be the  
22 case. But there will be some officers who will be asked  
23 more than he is.  
24 MR HALL: Of course, of course.  
25 THE CHAIR: I have suggestions to make about the documents

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1 and the redaction process, if this is the right time to  
 2 do it, I will.  
 3 MR HALL: Yes, please.  
 4 THE CHAIR: It seems to me that the redaction process may be  
 5 less burdensome than has been assumed up to now.  
 6 Documents broadly will fall into three categories.  
 7 Those which relate to deployments where I can only  
 8 receive evidence in closed hearings, when there will  
 9 simply be no need for any redactions. Those documents  
 10 will be treated, like the live evidence, as entirely  
 11 closed.  
 12 At the other end of the spectrum -- here I think  
 13 I will not get a grateful nod but something else -- we  
 14 have the ancient deployments into groups who are of  
 15 historic interest rather than groups whose members might  
 16 even then or certainly don't now pose any threat to  
 17 anybody. I take as an example, because we are going to  
 18 deal with this quite soon, the Vietnam Solidarity  
 19 Campaign. There are a fair number, not an inordinate  
 20 number of documents about that, but a fair quantity of  
 21 intelligence reports about that.  
 22 Using the Res Tool, which we have been hoping to be  
 23 able to do, the sort of redaction that you seek on  
 24 those, file numbers, names of officers who aren't of  
 25 interest to the Inquiry --

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1 MR HALL: Yes.  
 2 THE CHAIR: -- possibly some handwritten notes on documents,  
 3 would have been possible, albeit it would have been  
 4 a burdensome task. I think we have to recognise it is  
 5 not now possible. We will discuss this no doubt but my  
 6 view about the historic documents is that there can only  
 7 be redactions to support anonymity orders and nothing  
 8 else.  
 9 MR HALL: I wonder if that is right. The function of  
 10 Relativity, which obviously allows you to black out, if  
 11 one is reading a page to make sure one doesn't undermine  
 12 an anonymity application -- of which there are going to  
 13 be relatively few for the Vietnam Solidarity Campaign --  
 14 one has to read the documents and if you see a file  
 15 number I would have thought it is perfectly easy to  
 16 redact the file number.  
 17 THE CHAIR: It is simply pointless. What damage is being  
 18 done to any legitimate police interest to leave in an  
 19 old file number?  
 20 MR HALL: Well --  
 21 THE CHAIR: These are matters we can discuss in due course.  
 22 This is not a matter for now. But I am simply  
 23 indicating that a provisional view which I have formed,  
 24 it is becoming a better informed provisional view and  
 25 gradually getting firmer, but as always I'm open to

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1 proper submissions about it.  
 2 It did seem to me that the ancient harmless  
 3 deployments, that the need for redaction other than to  
 4 protect anonymity was either nil or so small as not to  
 5 create a great problem.  
 6 MR HALL: Yes.  
 7 THE CHAIR: Forgive me, I'm explaining a position and you of  
 8 course can respond, but I'm not foreclosing later  
 9 argument in detail.  
 10 MR HALL: Of course.  
 11 THE CHAIR: There are other deployments such as more recent  
 12 ones. I take this as an instance and not anything more  
 13 than that, but the deployment of HN81 Hagen into the  
 14 Movement for Justice, from what I have seen so far --  
 15 and it is not completed by any means -- from what I have  
 16 seen so far does not create any requirement for large  
 17 scale redaction. Possibly even none.  
 18 MR HALL: Sir, there are two processes at work. There is  
 19 the process of considering and there is the process of  
 20 redacting.  
 21 You may well be right that there is very little that  
 22 needs to be redacted, but all the documents do need to  
 23 be considered.  
 24 THE CHAIR: I have to read them, apart from anything else,  
 25 and no doubt lots of other people want to.

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1 MR HALL: Considered for restriction order processes.  
 2 Obviously we gratefully receive all suggestions but if  
 3 an officer has to -- as they must, otherwise it would be  
 4 negligent -- they must read the documents to consider is  
 5 there something which ought to be restricted in the  
 6 public interest, then it cannot add a huge amount of  
 7 time, having read it, if they redact a file name or not.  
 8 If so, you are suggesting that really one should say,  
 9 let's take a looser view of risk, we would respectfully  
 10 disagree.  
 11 THE CHAIR: I am not taking a looser view of risk. I am  
 12 proposing to, that in the case of certain deployments  
 13 even relatively modern ones, there is no risk.  
 14 MR HALL: That may be right, but we need to go through the  
 15 process.  
 16 THE CHAIR: Yes.  
 17 MR HALL: At the moment my submission would be that the  
 18 process of consideration is what takes times. The  
 19 actual process of applying the black marker pen does  
 20 not.  
 21 THE CHAIR: I am not sure that that is right. Of course  
 22 I don't want to put the public interest at risk and of  
 23 course I don't want to put the safety of any former  
 24 undercover officer at risk, and of course I must protect  
 25 the legitimate interest in private and family life where

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1 I have indicated that it should be protected.  
 2 Those three things are not going to arise in the  
 3 case of every document of many ancient deployments and  
 4 of some more recent ones.  
 5 I know you say they have to be considered. I agree.  
 6 I have indicated, not least, I have to read them. But  
 7 I do think that the physical process of blanking bits of  
 8 documents out is something that we can legitimately  
 9 avoid if we can.  
 10 MR HALL: It is always better to speak in the concrete than  
 11 the abstract --  
 12 THE CHAIR: Yes, of course.  
 13 MR HALL: -- one of the things I was going to mention on the  
 14 restriction order aspect is where we have put in  
 15 applications, we would be very grateful to see your  
 16 response.  
 17 THE CHAIR: Of course. I am going to come to those and  
 18 I will do so now if you would like me to.  
 19 MR HALL: Please, yes.  
 20 THE CHAIR: Right. I have a list of them here if I can find  
 21 it, under which there are 15 categories of documents  
 22 where we have asked you to produce them pursuant to  
 23 rule 9 requests. You have produced them. You have made  
 24 proposals for redactions of them to which we have not  
 25 responded. The reason we didn't respond, I am told, is

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1 because the Res Tool was not working.  
 2 Now we know it is not working, I entirely agree we  
 3 must respond to you in short order. What I am proposing  
 4 is that we do do that, and to the extent that things  
 5 can't be agreed between us and require a decision by me,  
 6 I will consider whether or not an oral hearing is  
 7 required. I suspect it will be and I will proceed on  
 8 the basis that it will be, and intend to fix one to take  
 9 place in the fairly near term. I have in mind by the  
 10 end of June at the latest --  
 11 MR HALL: There are some free dates now.  
 12 THE CHAIR: Quite. Those are in July, but I would hope to  
 13 be able to do this before then.  
 14 MR HALL: Yes.  
 15 THE CHAIR: When we can discuss all of these things. For  
 16 example the Vietnam Solidarity Campaign material, the  
 17 Lambert paper.  
 18 Really rather important, the Special Demonstration  
 19 Squad annual and six monthly reports where now that we  
 20 have done the bulk of the anonymity applications at  
 21 least up to the minded to stage, and a clear direction  
 22 of travel has been indicated in relation to some  
 23 deployments which have to be treated in closed, I would  
 24 hope that we can sort those matters out.  
 25 MR HALL: Yes.

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1 THE CHAIR: That is important, not merely for the purpose of  
 2 furthering the Inquiry but for the purpose of informing  
 3 those who may wish to give evidence, provide evidence,  
 4 to the Inquiry what they need to think about in advance.  
 5 MR HALL: I am grateful, yes.  
 6 THE CHAIR: I have taken those as examples. There are less  
 7 significant documents, but I personally am very keen to  
 8 get the batch of documents where you have provided us  
 9 with your views sorted out early.  
 10 MR HALL: Thank you.  
 11 THE CHAIR: That, I hope, will provide an indication of what  
 12 the likely outcome will be for those documents where you  
 13 have not yet reached a view.  
 14 MR HALL: Yes. Thank you. I mean like Tradecraft, that was  
 15 useful in setting the template.  
 16 THE CHAIR: Yes. Nothing is exactly the same, but that is  
 17 the sort of exercise that I anticipate.  
 18 MR HALL: I am grateful. You had, in fact, anticipated  
 19 a request I was going to make which was about  
 20 deployments which are going to be considered in closed.  
 21 THE CHAIR: Yes.  
 22 MR HALL: I am very grateful for the indication that you are  
 23 not going to be asking us to do a line-by-line redaction  
 24 exercise over documents --  
 25 THE CHAIR: It is wholly pointless.

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1 I can say that there is one minor wrinkle in it,  
 2 I think it is minor. Some closed deployments produced  
 3 reports about activities where the reports may well be  
 4 capable of being put into the public domain. They are  
 5 not to deal with the heart of the deployment.  
 6 MR HALL: They may well be capable --  
 7 THE CHAIR: Yes, we need to consider those. All I'm saying  
 8 is it is not quite as straightforward as I have  
 9 indicated. There may be some intelligence reports which  
 10 can be put into the public domain.  
 11 MR HALL: I understand that. What I am actually inviting  
 12 you to do is unless a closed deployment generates  
 13 reporting which is relevant to a particular issue which  
 14 you are concerned in investigating, is that one simply  
 15 doesn't require that exercise at all. What you are  
 16 suggesting almost sounds as if you ought to look at  
 17 every document just in case --  
 18 THE CHAIR: Not at all. This is an issue which I think we  
 19 can discuss not at a public hearing --  
 20 MR HALL: Right.  
 21 THE CHAIR: -- but I am merely flagging up that there is  
 22 an element of caution about that. Everyone is right in  
 23 assuming that closed deployments, that the documents  
 24 will be dealt with in closed. But there will be  
 25 occasional exceptions, which I anticipate we will

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1 identify to you rather than the other way round.  
 2 MR HALL: Very well.  
 3 THE CHAIR: Then, forgive me, there is a third category  
 4 which is where the difficulties arise.  
 5 MR HALL: Yes.  
 6 THE CHAIR: There are deployments which give rise to risk  
 7 and on the basis of some of those risks anonymity orders  
 8 have been made, but which have to be explored in public  
 9 session, to the extent they can be, which will be  
 10 largely the case. Where a detailed redaction exercise  
 11 on documents is required.  
 12 Can I give off the top of my head an example.  
 13 Deployments into animal rights groups. There were on  
 14 one view quite serious criminal acts and risks to those  
 15 reports on these groups.  
 16 MR HALL: Yes.  
 17 THE CHAIR: And, yet, there is an entirely legitimate public  
 18 interest in things that went wrong with those  
 19 deployments and how to deal with those is going to cause  
 20 problems for us and will undoubtedly require  
 21 a line-by-line exercise on the documents.  
 22 MR HALL: It sounds then that the Inquiry has in mind  
 23 particular deployments within the third category.  
 24 THE CHAIR: Yes.  
 25 MR HALL: We would again invite you, accepting that those

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1 are provisional, to share those with us as soon as  
 2 possible, so that we can all look around all the corners  
 3 that may arise.  
 4 THE CHAIR: I mean I have said what I have so we can all  
 5 think about it in advance. I don't think it is sensible  
 6 for us to exchange views off the top of our heads now  
 7 about it.  
 8 MR HALL: Yes.  
 9 THE CHAIR: Asking us to identify to you in advance those  
 10 deployments where this exercise is likely to be required  
 11 is a perfectly legitimate request, but I will have  
 12 I think to consult with my team before giving you  
 13 a considered response.  
 14 MR HALL: I am grateful.  
 15 I think there is a request for a break.  
 16 THE CHAIR: Of course. I do apologise. We will break for  
 17 ten minutes and the shorthand writers can take advantage  
 18 of it, as can anybody else who wishes.  
 19 (11.47 am)  
 20 (A short break)  
 21 (11.57 am)  
 22 THE CHAIR: Could everybody please be quiet, thank you.  
 23 Mr Hall, you made two requests of me which I can  
 24 answer now.  
 25 First, can we identify the officers from whom

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1 witness statements will not be required. Yes.  
 2 MR HALL: I am grateful.  
 3 THE CHAIR: Second, can we identify the categories of  
 4 deployments of the three that we have been discussing.  
 5 The answer again is yes.  
 6 MR HALL: Thank you.  
 7 Sir, I may have an opportunity to reply and we will  
 8 take instructions on the points.  
 9 THE CHAIR: Yes.  
 10 MR HALL: I have to confess, we have not taken instructions  
 11 on those points in the short break, forgive me.  
 12 THE CHAIR: Yes.  
 13 MR HALL: I don't have a huge amount more to say.  
 14 Can I deal with really one further point and then  
 15 a couple of final points?  
 16 The further point is in relation to current -- that  
 17 is today -- undercover policing. Documents and officers  
 18 involved in current undercover policing are in the most  
 19 sensitive category, obviously.  
 20 THE CHAIR: Yes.  
 21 MR HALL: It would help the Metropolitan Police Service to  
 22 know whether any of those matters -- so that is current  
 23 policing -- are to be considered in module 1 or 2, or  
 24 whether the Metropolitan Police Service can understand  
 25 that those deployments and officers will only be

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1 considered in module 3 where, as I understand it, there  
 2 will be no, as it were, public hearing but there will be  
 3 visits by you and a panel.  
 4 THE CHAIR: That is if the Home Secretary agrees to assist  
 5 me by appointing a panel to deal with module 3.  
 6 MR HALL: Indeed, or just you.  
 7 The question is whether the Metropolitan Police  
 8 Service needs to be prepared for a redaction exercise  
 9 over documents and statements dealing with current  
 10 undercover deployments. They are massively difficult  
 11 and time consuming. If that category of activity is not  
 12 going to be dealt with in modules 1 or 2, we would ask  
 13 you to stop serving rule 9 witness statement requests in  
 14 relation to current policing or to requiring restriction  
 15 order applications to be made over documents relating  
 16 current undercover policing and allow the Metropolitan  
 17 Police Service to focus its resources over the historic  
 18 documents with which modules 1 and 2 appear to be  
 19 concerned.  
 20 THE CHAIR: This is a problem which arises not just with the  
 21 Metropolitan Police Service but also with other forces  
 22 and regional units which have deployed undercover  
 23 officers.  
 24 There has been -- I have no doubt it has been  
 25 perceived -- a slight shift between modules 1, 2 and 3

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<p>1 in that the strategic review indicates my intention that  2 current deployments should be part of module 3 and not  3 part of modules 1 and 2, partly for the reasons that  4 I have explained that it does actually require us to  5 understand what is now going on by visiting places from  6 which these activities are being conducted and visiting  7 the training course.</p> <p>8 In those circumstances -- here I am speaking off the  9 top of my head rather than by way of a considered view,  10 and I will need to discuss this ... my own view at the  11 moment is that we will not require redaction exercise in  12 relation to current deployments because I anticipate  13 that we will have to deal with current deployments,  14 actual deployments, entirely in closed.</p> <p>15 MR HALL: I am grateful, thank you.</p> <p>16 One final point to mention by way of really  17 information so that the Inquiry has on its radar  18 a particular demand, of course you are completely aware  19 of the general demands on the police generally, but I do  20 want to mention the fact that there are other undercover  21 related but not Inquiry Act proceedings to do with  22 undercover policing with which the same team within the  23 Metropolitan Police Service legal and officers need to  24 deal. By way of example, there is one major overlapping  25 claim in the Investigatory Powers Tribunal concerning</p> <p style="text-align: center;">Page 53</p>	<p>1 Inquiry team worked really well and in fact we would  2 suggest that one scales up and has weekly meetings in  3 relation to all the strands, IMOS, et cetera. It  4 doesn't have to be of all those individuals but perhaps  5 at least one fixed-in-the-diary weekly meeting where  6 planning and logistics can be discussed, because we  7 think if we identify a problem and deal with it early,  8 that's much better than having to deal with it later on.</p> <p>9 THE CHAIR: That strikes me as eminently sensible, but  10 before I can answer that, I need to consult with the  11 team who would, after all, be conducting the meetings.</p> <p>12 MR HALL: Indeed.</p> <p>13 I think finally to say lest it be suggested, we  14 obviously submit that maximum engagement in no way  15 amounts to a loss of independence. I mean, the Inquiry  16 can be critical of the Metropolitan Police Service.  17 Critical of things that have happened in the past and  18 rightly so, critical of the Metropolitan Police Service  19 going forward if that is justified, whilst at the same  20 time talking, meeting, planning, et cetera, with the  21 Metropolitan Police Service.</p> <p>22 These submissions have been deliberately forward  23 looking. Other core participants will not know -- that  24 is no criticism of them at all because they have not  25 been in a position to know -- the volume of work that</p> <p style="text-align: center;">Page 55</p>
<p>1 undercover policing and individuals are entitled to  2 bring other claims or indeed to make Data Protection Act  3 requests. If that takes time away from responding to  4 the Inquiry, so be it, but it must be recognised that  5 these additional pressures do have an impact, because it  6 will be the same team.</p> <p>7 THE CHAIR: I am afraid that is not something to which I can  8 respond. In the traditional phrase, I hear what you say  9 but there is nothing I can say about that.</p> <p>10 MR HALL: Indeed. But I mention it and you hear it.</p> <p>11 THE CHAIR: Yes.</p> <p>12 MR HALL: I think I can now just deal with two final points.</p> <p>13 By way of summarising, we are asking the Inquiry to  14 be flexible enough to provide work early and even  15 tentative indications about where the Inquiry is going,  16 provide us with a flow of work. That is how the  17 Metropolitan Police Service operates best. A good chunk  18 of work which they can get on and do and provide  19 timelines, we would ask, which are flexible rather than  20 as it were artificial court style deadlines.</p> <p>21 We found that towards the end of the anonymity  22 process -- we have now made our considerations over all  23 but one of the officers, which is an achievement --</p> <p>24 THE CHAIR: Yes.</p> <p>25 MR HALL: -- and we found the level of engagement with the</p> <p style="text-align: center;">Page 54</p>	<p>1 has been done to date by the Metropolitan Police  2 Service.</p> <p>3 Sir, those are my submissions.</p> <p>4 THE CHAIR: Yes.</p> <p>5 Can I mention one further thing? It is a topic we  6 have canvassed already. That is your suggestion that  7 counsel is nominated on our side to deal with document  8 splitting. We see that as a practical exercise which  9 does not require the input of counsel who, after all,  10 are not in infinite supply on our side and have other  11 things to do.</p> <p>12 I intend -- unless you persuade me to the contrary  13 after you have taken instructions on what I am  14 suggesting -- to nominate one person from our side,  15 a very experienced paralegal who can wear both hats.  16 I don't mind if you have two on your side, but I don't  17 want a committee.</p> <p>18 MR HALL: I entirely agree. The only reason for having  19 counsel -- it may be that it is unnecessary -- is that  20 ultimately someone is going to have to make a decision  21 about this and let's say there is a debate about whether  22 it is practicable, who should do the document splitting  23 of past documents, whether the workaround suggested by  24 the Metropolitan Police Service is consistent what the  25 Inquiry is trying to achieve. That is going to have to</p> <p style="text-align: center;">Page 56</p>

<p>1 be adjudicated upon.</p> <p>2 THE CHAIR: I think you will find that the person that</p> <p>3 I intend to nominate to this difficult task will be</p> <p>4 fully cognisant of the issues.</p> <p>5 MR HALL: Then I will say no more.</p> <p>6 THE CHAIR: I, for my part, do not mind if you have two on</p> <p>7 your side. The person I have in mind will be perfectly</p> <p>8 capable of taking them on.</p> <p>9 Mr Sanders, I think logically you were next in this</p> <p>10 exercise.</p> <p>11 MR SANDERS: Thank you, sir.</p> <p>12 Submissions on behalf of the Metropolitan Police Service</p> <p>13 Designated Lawyers by MR SANDERS</p> <p>14 MR SANDERS: Sir, as you know I represent just over 100</p> <p>15 former Metropolitan Police Service officers. More than</p> <p>16 100, I think, with a Special Demonstration Squad</p> <p>17 background and then a handful with an National Public</p> <p>18 Order Intelligence Unit background.</p> <p>19 In terms of the three segments of module 1 and 2</p> <p>20 evidence in the strategic review, I have 30 plus clients</p> <p>21 in each of the three segments. They are not only all</p> <p>22 over the country, they are all over the world. Some</p> <p>23 still in work, some retired but with numerous different</p> <p>24 types of commitments.</p> <p>25 We have not yet seen any rule 9 requests, not only</p> <p style="text-align: center;">Page 57</p>	<p>1 like. I don't have any proposals but that was one</p> <p>2 question we had.</p> <p>3 The second miscellaneous question was just as to the</p> <p>4 point at which Maxwellisation would fit in as well with</p> <p>5 the timetable.</p> <p>6 THE CHAIR: We have considered that. On the programme</p> <p>7 planners' tables there is provision for that. We are</p> <p>8 a long way off, but my intention is that the</p> <p>9 Maxwellisation as you and I call it, but the issuing of</p> <p>10 warning letters to those who may be the subject of</p> <p>11 criticism in the report formally, will start before the</p> <p>12 interim report is finished. I intend to do it in stages</p> <p>13 and so that those who are the subject of criticism in</p> <p>14 the first part will receive their Maxwellisation letters</p> <p>15 before those who feature in the second part, before</p> <p>16 those who feature in the third part and -- if there is</p> <p>17 one -- before those who feature in the fourth part.</p> <p>18 I don't think I can say any more about it at this</p> <p>19 stage; there is a statutory procedure to be followed.</p> <p>20 MR SANDERS: Sir, yes. Just thinking off the top of my</p> <p>21 head, one thing to raise in relation to that, if</p> <p>22 Maxwellisation becomes a parallel strand of the Inquiry</p> <p>23 work, would from my perspective to be to bear in mind</p> <p>24 that I, and my team, may then become privy to an</p> <p>25 indication about a criticism in circumstances where we</p> <p style="text-align: center;">Page 59</p>
<p>1 for our clients but we have not seen any rule 9 requests</p> <p>2 full stop. That is where we are in terms of looking at</p> <p>3 the strategic review.</p> <p>4 Then in giving our response or in raising with you</p> <p>5 the points we want to raise that have for us fallen out</p> <p>6 of the strategic review, and the meeting that was held</p> <p>7 yesterday, which for the benefit of others in the room</p> <p>8 I don't know if you want to explain what that was,</p> <p>9 I wasn't there, but as I understand it was a meeting</p> <p>10 with a programme manager from the Inquiry team, a member</p> <p>11 of the Inquiry counsel team, with my instructing</p> <p>12 solicitors and with Mr Hall's instructing solicitors and</p> <p>13 some members of counsel.</p> <p>14 THE CHAIR: Yes, it was quite a large meeting.</p> <p>15 MR SANDERS: Yes.</p> <p>16 There has been some discussion about the strategic</p> <p>17 review.</p> <p>18 I really want to focus on two areas in terms of the</p> <p>19 strategic review.</p> <p>20 Just before I do that, there were two miscellaneous</p> <p>21 matters that just occurred to us which I just flag now.</p> <p>22 (1) what the proposal might be in relation to</p> <p>23 opening statements and the difficulty of opening</p> <p>24 statements being made before all the evidence has been</p> <p>25 proofed and collated and so on, what that might look</p> <p style="text-align: center;">Page 58</p>	<p>1 have other clients to whom we owe duties of disclosure</p> <p>2 and so on. So I just mention that that might be</p> <p>3 potentially an issue.</p> <p>4 THE CHAIR: Then you may have to create within yourself or</p> <p>5 within your team an ethical wall.</p> <p>6 MR SANDERS: Yes. Possibly the latter would be more</p> <p>7 practicable.</p> <p>8 THE CHAIR: Maybe. You made a comment about opening</p> <p>9 statements. This we all need to think about.</p> <p>10 MR SANDERS: Yes.</p> <p>11 THE CHAIR: Whether there are opening statements at the</p> <p>12 beginning of each phase of the public hearings or</p> <p>13 whether there is one opening statement which, as you</p> <p>14 rightly say, is likely to be made in advance of all of</p> <p>15 the packages of evidence being prepared, it is</p> <p>16 inevitable that that will be the case. Which of those</p> <p>17 two we opt for, or possibly a hybrid, I will consult</p> <p>18 about. But no decision has been made about that yet.</p> <p>19 MR SANDERS: I understand, thank you, sir.</p> <p>20 My two main areas on the strategic review and on the</p> <p>21 next 12 months really, are first process and second</p> <p>22 logistics.</p> <p>23 In relation to process, and where we are from that</p> <p>24 perspective, the wrapping up of modules 1 and 2 into</p> <p>25 a single evidential phase obviously raised the questions</p> <p style="text-align: center;">Page 60</p>

<p>1 about what the module 2 issues are. Because at the                  2 moment you have consulted on a module 1 issues list.                  3 That has not been finalised as --                  4 THE CHAIR: No, I am afraid in the need to do a lot of other                  5 things, that has not been at the forefront of my mind at                  6 least --                  7 MR SANDERS: No.                  8 THE CHAIR: -- and I have not applied my mind to it yet.                  9 MR SANDERS: We quite understand that, and no criticism of                  10 anyone in relation to that, sir.                  11 The sight of the module 2 issues in advance of                  12 proofing any module 2 clients would, in my submission,                  13 be important.                  14 Allied to that there is another issue which it would                  15 just be helpful to get a steer from you on, sir, which                  16 is as to the approach to be taken to officers with                  17 a dual role. Officers who were deployed undercover, so                  18 have module 1 evidence to give, who then came back to                  19 the Special Demonstration Squad as managers and so                  20 therefore have module 2 evidence to give.                  21 THE CHAIR: Some of them are going to have to give evidence                  22 twice. I cannot now say how many of them, but my                  23 expectation is that certainly if they are in different                  24 tranches of evidence -- so someone deployed in the mid                  25 1980s who comes back as a manager in the late 1990s,</p> <p style="text-align: center;">Page 61</p>	<p>1 comment on in their statement.                  2 THE CHAIR: The intention is to provide a package of                  3 documents relevant to that deployment, the deployment of                  4 that officer, which will permit him to refresh his                  5 memory about things and to deal with any criticisms that                  6 may appear on the face of or necessarily implicit in the                  7 documents.                  8 MR HALL: Thank you, sir. Presumably that will not be                  9 redacted in the case of an officer who would have been                  10 privy to the information at the material time?                  11 THE CHAIR: One would hope not. But I am afraid that                  12 discussions there have not reached absolute final                  13 conclusion yet. The Metropolitan Police Service,                  14 I think, do wish to exercise a degree of control over                  15 the documents that are shown to officers. If we have                  16 one or two practical examples under our belt then                  17 I think that will inform future cases. It is something                  18 which is, I think, not helpful to discuss in the                  19 abstract.                  20 MR SANDERS: I understand.                  21 Two types of document that we wanted to ask about:                  22 the strategic review and I think other documents that                  23 the Inquiry has issued refer to overarching evidence, so                  24 evidence that has been obtained from the Metropolitan                  25 Police Service or from the National Police Chiefs'</p> <p style="text-align: center;">Page 63</p>
<p>1 that person will have to give evidence twice. But                  2 someone deployed in the late 1970s, who came back as                  3 a manager in the -- I am sorry, that is an bad example.                  4 Someone deployed in the early 1980s who came back as                  5 a manager before about 1992 may be able to give evidence                  6 once. But I think that those who did perform both                  7 functions can expect to have to give evidence twice.                  8 MR SANDERS: Sir, I understand that in relation to live                  9 evidence. A question would be will there be separate                  10 rule 9 requests, and separate statements from those                  11 officers? Because it is obviously one thing to go                  12 through a proofing exercise twice as opposed to going                  13 through it once, but maybe coming to deal with it live                  14 on two occasions.                  15 THE CHAIR: I need to consult my own team about that. Off                  16 the top of my head, my answer is no that one statement                  17 will be obtained.                  18 MR SANDERS: I am grateful.                  19 I just reiterate the point that knowing the module 2                  20 issues in advance of anyone giving a dual statement is                  21 going to be important.                  22 That, in terms of process, is that issue.                  23 Then in relation to documents, just understanding                  24 what it is that will accompany or follow a rule 9                  25 request, that the officer will be asked to look at or</p> <p style="text-align: center;">Page 62</p>	<p>1 Council about policies, procedures, systems generally.                  2 We would ask is there going to be a list of what has                  3 been collated, published or disclosed, and will it be                  4 possible to see any of those materials?                  5 From my clients' perspectives, if they are being                  6 asked about something and the Inquiry has obtained other                  7 evidence or information about that, or has other                  8 documents about that, then it may be helpful to see                  9 those.                  10 THE CHAIR: It may or may not be. But I doubt it is                  11 a sensible method of proceeding. What in modules 1 and                  12 the operational part of module 2 the Inquiry is doing                  13 its best to find out is what happened, not what the                  14 policies were. I certainly can't promise that any                  15 officer asked for a statement is going to -- that you                  16 and your team will have a full package of high level                  17 policy documents before any request is made. I think                  18 that is unlikely.                  19 MR SANDERS: No, and probably not particularly desirable                  20 from our perspective.                  21 But perhaps seeing a list of what you have collated                  22 or the topics that you have covered in rule 9 requests                  23 already, or in the higher level overarching evidence                  24 obtained may assist. There may be something there that                  25 we might be assisted by.</p> <p style="text-align: center;">Page 64</p>



<p>1 THE CHAIR: I need to ask about that. I don't know the                  2 answer off the top of my head. All I'm attempting to do                  3 is to lead you not to expect to have everything that the                  4 Inquiry will have by the time it is finished at the                  5 earlier stages.                  6 MR SANDERS: No, no.                  7 THE CHAIR: This is a constant theme I've been harping upon                  8 I am afraid, and it applies to this phase of the Inquiry                  9 as well.                  10 MR SANDERS: Yes. Obviously in relation to the rule 9                  11 package and the criteria that have been applied in                  12 pulling that together, there, in our submissions, is                  13 a need for transparency about that and clarity about it.                  14 Is the package going to be a comprehensive set of                  15 everything that could be said to be relevant to the                  16 particular officer? Is it focused on particular issues                  17 or areas? It would help to know that.                  18 THE CHAIR: The intention will be to give to that officer                  19 everything that we think he or she will need to see to                  20 be able to provide an account of what they did.                  21 MR SANDERS: Are those materials exclusively obtained from                  22 the Metropolitan Police Service? Or largely --                  23 THE CHAIR: You mean in the case of Metropolitan Police                  24 Service deployments? You are not talking about National                  25 Public Order Intelligence Unit deployments?</p> <p style="text-align: center;">Page 65</p>	<p>1 reading of the strategic review and the restriction                  2 order process is that the Inquiry is publishing cover                  3 names with a view to calling for, inviting responses                  4 from the public.                  5 THE CHAIR: Indeed. The current stance is that members of                  6 the public wish to see what the Inquiry can produce to                  7 them before they provide anything to the Inquiry.                  8 MR SANDERS: Yes. What we would say is that there is                  9 obviously going to be a difficulty if officers are asked                  10 to provide a statement on the basis of certain materials                  11 and then their statements are released in whatever                  12 form -- redacted form -- and then allegations are made.                  13 Because those statements may allow a framework within                  14 which allegations could be made.                  15 One way of mitigating that difficulty, in our                  16 submission, would be rather than simply invite in                  17 a general relatively soft way allegations or claims                  18 about particular cover names, would be to set a deadline                  19 not for provision of evidence, but just for people to                  20 make any allegations of serious wrongdoing that they may                  21 wish to make by a particular point, so that there is                  22 clarity about that.                  23 There are two aspects to that.                  24 One is the aspect of fairness and individuals giving                  25 evidence and knowing what it is that is said against</p> <p style="text-align: center;">Page 67</p>
<p>1 MR SANDERS: Correct.                  2 THE CHAIR: In the case of Metropolitan Police Service                  3 deployments, the answer is in principle yes.                  4 MR SANDERS: One question that has been raised with us by                  5 a number of clients, and has come up a number of times,                  6 is as to what documents either the Home Office or MI5                  7 have disclosed. A number of my clients believe that                  8 those bodies will have relevant documents and documents                  9 pertaining to and deriving from their deployments.                  10 A question for you, sir, really is what if any steps                  11 have been taken to enquire about documents of that kind?                  12 THE CHAIR: I am afraid I cannot answer that in a public                  13 forum.                  14 MR SANDERS: I understand. Well, I have flagged it. That                  15 is something that is of concern to us and to a number of                  16 our clients.                  17 THE CHAIR: I readily understand it. But I can say no more                  18 about it at the moment than I have.                  19 MR SANDERS: Understood. I am grateful.                  20 The final subheading really under this process                  21 question is a topic Mr Hall has raised, which is the                  22 handling of allegations of misconduct during deployments                  23 from members of the public.                  24 It is obviously an area where there are liable to be                  25 disputes of fact arising for you to resolve. Our</p> <p style="text-align: center;">Page 66</p>	<p>1 them and what it is that they should be addressing and                  2 dealing with and so on.                  3 Then, secondly, from your perspective, it is just                  4 the question of putting you in the best possible                  5 position to resolve disputes of fact.                  6 Because if one has a situation where an allegation                  7 is made late in the day after sight of a witness                  8 statement, the question may arise, "If that is true and                  9 if the person in question remembers so and so doing                  10 that, why wasn't that said sooner?"                  11 On the current basis, the answer would be, "Well                  12 I was not asked to say sooner". Whereas if you have                  13 a staging point along the way where allegations of                  14 serious wrongdoing in relation to particular cover names                  15 are invited and then not made, then that would be                  16 something that would potentially be weighed in the                  17 balance in terms of reliability and credibility.                  18 THE CHAIR: I am not willing to do that.                  19 MR SANDERS: Could I ask why not?                  20 THE CHAIR: Yes. I have already indicated that I am not                  21 going to use coercive powers to require members of the                  22 public to provide evidence to the Inquiry. It is                  23 a matter for them if they choose to do so or not.                  24 It is inevitable in an inquiry of this kind, over                  25 many years and into many incidents, that late evidence</p> <p style="text-align: center;">Page 68</p>

<p>1 will emerge, or if you prefer it, late allegations will 2 emerge.</p> <p>3 To impose an artificial deadline at this stage is 4 not, in those circumstances, sensible. This is an 5 inquiry into undercover policing, not into the members 6 of the public who may have been affected by it. Their 7 evidence is of course important, but it is an inquiry 8 into what happened by way of undercover policing. The 9 first requirement has to be that evidence is obtained 10 from those who were performing the task.</p> <p>11 Precisely how we deal with allegations that are not 12 referred to in the witness statement made as a result of 13 the rule 9 request is something that we will have to 14 reflect upon and deal with when it arises. I will 15 invite views on whether officers should be shown in 16 advance witness statements critical of them. My current 17 view is that of course they should be so that they will 18 go into the hearing knowing what the allegations are.</p> <p>19 There is a further question as to whether or not 20 they should then be given opportunity of responding in 21 writing. That may depend upon the timing. It may also 22 depend upon fairness, it may depend on a number of 23 factors. I don't think it is sensible to attempt to 24 give an abstract answer now.</p> <p>25 MR SANDERS: Sir, yes. I mean to be clear I wasn't</p> <p style="text-align: center;">Page 69</p>	<p>1 THE CHAIR: Please, this is not a public meeting. It is 2 a serious discussion. Forgive me, I won't respond to 3 that.</p> <p>4 One of the things that has occurred is that officers 5 faced with the knowledge that their actions are going to 6 be explored, where possible in the public setting, have 7 provided evidence which they have not hitherto provided. 8 This is, I think, a salutary part of the exercise. I am 9 content that it is, or it appears to be working. I'm 10 therefore going to leave in place the procedures that we 11 are adopting and have indicated we will adopt.</p> <p>12 MR SANDERS: Sir, yes. Just to respond to the point you 13 made about this happening in ordinary litigation. Of 14 course in ordinary litigation one has pleadings or can 15 counts on an indictment or whatever and then one has the 16 exchange of witness statements or whatever. There is 17 not an analogue for this one party all the cards on the 18 table first, other party responds to that.</p> <p>19 THE CHAIR: I accept that. It is an inquiry.</p> <p>20 The way we have indicated we are going to deal with 21 these investigative issues is that which I have stated, 22 and I'm not prepared to depart from it as a matter of 23 generality. I never say never because I have learnt in 24 the last year about things that I would never have 25 contemplated could have occurred and circumstances which</p> <p style="text-align: center;">Page 71</p>
<p>1 suggesting any exercise of coercive powers, or even 2 a change in the sequence of obtaining evidence. It 3 would simply be to say that if anyone on the basis of 4 this information about these cover names wishes to 5 outline an allegation of serious wrongdoing, then to do 6 it by a particular date. Then that would enable you to 7 know that it wasn't something that was only raised once 8 it became clear from a witness statement that --</p> <p>9 THE CHAIR: There has to be a basic template. The basic 10 template is that evidence will be obtained from deployed 11 officers and their managers first. If there are 12 allegations which are not dealt with in the first 13 statements that they make, we will have to see how to 14 deal with those.</p> <p>15 Of course, it may be a relevant factor that an 16 allegation is made very late in the day. These are the 17 sorts of things that happen in ordinary litigation. As 18 a judge one simply has to reach a view about them and 19 I am simply not willing at this stage to prescribe in 20 advance a deadline for making allegations because --</p> <p>21 MR SANDERS: Not a deadline, sir, but just a point by which, 22 if just on the strength of cover name there is an 23 allegation to be made, a point just to give notice of 24 that.</p> <p>25 [Interjection from the public gallery]</p> <p style="text-align: center;">Page 70</p>	<p>1 I simply did not have in mind when I made my statement 2 on 20 November.</p> <p>3 But we have to have an orderly procedure and I am 4 afraid that's it.</p> <p>5 MR SANDERS: Sir, I will maybe come back to it at some point 6 in the future. But in relation to rule 9 requests, and 7 your formulation of the issues that you want addressed 8 in a witness statement. Is it the case that to the 9 extent that you have received allegations of wrongdoing, 10 they will be fed into the rule 9 process?</p> <p>11 THE CHAIR: Certainly. Where the Inquiry is aware of them, 12 very much so.</p> <p>13 MR SANDERS: I am grateful.</p> <p>14 The point about conflicts that my learned friend 15 Mr Hall raised, and how it ties in with the question of 16 evidence in reply as it were, is a very important one. 17 I would just really echo what he has said about that, 18 particularly from a timing perspective. It may help 19 just to make clear in public what I am talking about and 20 why that is.</p> <p>21 The designated lawyer team is funded by the 22 Metropolitan Police Service. We are independent of the 23 Metropolitan Police Service and we represent our clients 24 independently and advice we give them is privileged and 25 not disclosable to the Metropolitan Police Service. The</p> <p style="text-align: center;">Page 72</p>

<p>1 solicitors' code of conduct rules mean that because the 2 main designated lawyers and solicitors -- Mr Spanton and 3 Ms Peacock -- because they are Metropolitan Police 4 Service employees they are able to act for former and 5 current Metropolitan Police Service employees provided 6 there is no conflict between those individuals and the 7 employer of Mr Spanton and Ms Peacock, namely the 8 commissioner. 9 If there is a situation where there is a conflict 10 between the commissioner and an individual, then 11 designated lawyer representation will have to be 12 withdrawn. That is obviously a difficulty. But it is 13 a difficulty that can very, very much arise on the 14 facts, because whether or not there is a conflict 15 between a designated lawyer officer and a commissioner 16 will ultimately come down to what is the approach the 17 commissioner is going to be taking in the hearing, in 18 the Inquiry, to that officer's conduct. Is the 19 commissioner going to be remaining neutral about it or 20 supportive of it, or is she going to be actively 21 critical. That can be the point at which the conflict 22 arises. 23 If an allegation is made late in the day and a reply 24 to that is made late in the day, then obviously 25 a conflict can emerge very late in the day and require</p> <p style="text-align: center;">Page 73</p>	<p>1 allegation is received and then the response to the 2 allegation is provided. 3 THE CHAIR: I can understand where the commissioner takes 4 the view that an officer is not telling truth. Then for 5 an employee of commissioner acting as solicitor for that 6 individual might cause problems. 7 But merely where there is a difference of view about 8 whether conduct about which there is no factual dispute 9 was or was not acceptable, I find that difficult to 10 understand. 11 MR SANDERS: I will just defer to Mr Hall in one moment, but 12 from my perspective it appears as a matter of principle 13 more problematic than you obviously see it. 14 THE CHAIR: I think possibly, before this topic is explored 15 further if it needs to be today, that you discuss it 16 with Mr Hall over the long adjournment. 17 MR SANDERS: I have discussed it with Mr Hall on a number of 18 occasions. 19 THE CHAIR: I see, so this is the result of discussions 20 which you have already had? 21 MR SANDERS: Yes, we are on speaking terms. 22 THE CHAIR: I am aware of that. In which case I can perhaps 23 ask Mr Hall if he has anything to say about it. 24 MR HALL: Just to say that we can't deal with it today, but 25 we have had a lot of letters, almost exam questions from</p> <p style="text-align: center;">Page 75</p>
<p>1 withdrawal of representation and termination of the 2 retainer. 3 THE CHAIR: I am surprised, and even alarmed, that the 4 taking of the standpoint by the commissioner might cause 5 a designated lawyer to conclude that there was such 6 a conflict of interest that he or she could not act for 7 the relevant undercover officer or manager. Is that 8 really the case? 9 MR SANDERS: If in the hearing Mr Hall was going to put 10 questions or make submissions that were contrary to my 11 clients' interests, then that would create -- 12 THE CHAIR: Let us suppose that there is evidence of some 13 impropriety or misconduct on the part of a particular 14 individual who the designated lawyers represent, and 15 Mr Hall says, well, if this occurred then it is entirely 16 unacceptable. That, surely, would not constitute 17 circumstances which meant that the designated lawyer 18 could no longer continue to act? 19 MR SANDERS: From my perspective, I would have thought it 20 would be perfectly capable of creating that conflict, 21 because we would be on opposite sides. 22 THE CHAIR: Only if you are advocating that the conduct 23 should be regarded by the standards of the time as 24 acceptable. 25 MR SANDERS: Yes. That may only become clear when an</p> <p style="text-align: center;">Page 74</p>	<p>1 the designated lawyer team, very sensible: what do we do 2 in this situation? We have tried to sketch out the sort 3 of situations in which a conflict would not or would 4 arise. Advice has been sought from specialist counsel 5 in the field. We have been talking about this for 6 a long time. Mr Sanders is absolutely right to raise 7 this, even if on one's feet, sir, you don't agree with 8 a particular characterisation of something being 9 a conflict, that possibility does exist, as Mr Sanders 10 says, on the facts. It is something that needs to be 11 recognised because the conflict may emerge, you may 12 disagree it is a conflict but ultimately it is a matter 13 for the designated lawyer solicitors because is their 14 professional obligation, but it may arise quite late in 15 the day. I think that is the point. It is a practical 16 problem. 17 THE CHAIR: Then I think it is capable of being practically 18 resolved. Because where there are very strong 19 differences of view between the commissioner and former 20 officers, then the Police Federation is taking up the 21 cudgels for the former officers. Ought they not to be 22 alerted in advance to instances in which they may 23 possibly be asked to take over representation? 24 MR HALL: Those are exactly the sorts of considerations we 25 have in mind. But one of the difficulties is if a late</p> <p style="text-align: center;">Page 76</p>

<p>1 allegation is made, then the conflict may not arise                  2 until very late in the day. Of course now one can see                  3 there are certain officers where the Metropolitan Police                  4 Service or the designated lawyers could not possibly                  5 represent them. Take some of the officers who are                  6 represented by Slater and Gordon, they were recognised                  7 a long time ago. The practical issue is what happens if                  8 a conflict only emerges, and no one could be criticised                  9 for not seeing it earlier on, late in the day?                  10 THE CHAIR: I can't at the moment think that it will often                  11 going to arise at the hearing. I think it is more                  12 likely to arise at the stage at which witness evidence                  13 is exchanged.                  14 MR HALL: That's right. Once the allegations, if there are                  15 allegations, are made by members of the public.                  16 THE CHAIR: Quite. That will not be the day before the                  17 hearing. That will be, I anticipate, at least a month                  18 or two in advance.                  19 MR HALL: That's precisely why we raise it. There has to be                  20 sufficient time for those last-minute adjustments to be                  21 made if a conflict does arise.                  22 THE CHAIR: That is, with respect, a matter for the three                  23 legal teams that are representing these officers and                  24 former officers. What needs to be done is a discussion                  25 with Police Federation representatives to ensure that</p> <p style="text-align: center;">Page 77</p>	<p>1 to it.                  2 MR SANDERS: Sir, yes. I would emphasise the question of                  3 timing and making sure that the process and the                  4 timetable has a buffer that is going to allow for that                  5 to happen.                  6 At one point I picked up that we might get -- an                  7 officer might see any statements containing allegations                  8 about them a month before they are due to give evidence.                  9 In my submission, that would be to take instructions on                  10 allegations, potentially to produce some kind of                  11 evidence in reply -- and I appreciate there is                  12 a question about what process he would adopt in that                  13 regard -- and then if a conflict emerges to arrange                  14 representation, four weeks is a very short space of                  15 time.                  16 THE CHAIR: Indeed it is. I now know it is never wise to                  17 say never, but I would be surprised if that situation                  18 were to arise in such a short time-frame.                  19 MR SANDERS: I am grateful. We have flagged what the issue                  20 is and I don't think there is anything more to say                  21 about it.                  22 THE CHAIR: Is what I envisage as the potential solution --                  23 I assume it has been thought about. Is it dismissed out                  24 of hand or accepted as in principle reasonable or what?                  25 MR SANDERS: In terms of the Police Federation?</p> <p style="text-align: center;">Page 79</p>
<p>1 they are in a position to take over representation with,                  2 obviously, the consent of the individual officer                  3 concerned, at a relatively late stage in the Inquiry.                  4 MR HALL: Sir, I have stood up, maybe not helpfully, but                  5 just to let you know this is a point of real concern                  6 which we have identified, probably over six months or so                  7 we have been talking about it.                  8 THE CHAIR: I am grateful to you for identifying it. Unless                  9 you disagree with the suggestion that I have made, in                  10 which case I think it is possibly a matter for debate on                  11 another day, and I am sure you have reflected upon that                  12 as a possibility, then it seems to me that that is the                  13 practical way around this problem.                  14 MR HALL: I hear what you say. The practical realities for                  15 getting anyone to commit to funding representation in                  16 advance of the need arising are significant.                  17 THE CHAIR: Yes. But Slater and Gordon have been put in                  18 funds by the Police Federation at fairly short notice in                  19 the past, I think.                  20 MR HALL: The issue is raised.                  21 THE CHAIR: Yes.                  22 Mr Sanders, I don't think it can be taken any                  23 further today, but I hope what I have said is not wildly                  24 off beam and that there are practical means by which                  25 this problem can be resolved if everyone puts their mind</p> <p style="text-align: center;">Page 78</p>	<p>1 THE CHAIR: Yes.                  2 MR SANDERS: I simply don't know what the answer is in                  3 relation to Police Federation funding. The discussions                  4 I have had have led me to believe that it doesn't follow                  5 that simply because someone falls out of the designated                  6 lawyer team that they will necessarily be covered by                  7 some kind of funding.                  8 THE CHAIR: Given those who are represented by the Police                  9 Federation lawyers, the sort of allegations that are                  10 likely to be made which might cause difficulties for                  11 your team are those which have been made in some cases                  12 in the case of those represented by Police Federation                  13 lawyers. Unless they take -- for reasons I can't                  14 envisage -- a different attitude to particular                  15 individuals, I don't see what the problem in principle                  16 is. The Police Federation most effectively representing                  17 their members, and I would have thought it was just part                  18 of the service.                  19 MR SANDERS: I have no basis for disagreeing with that, sir.                  20 It is just outside my knowledge.                  21 THE CHAIR: I strongly urge you and the commissioner to open                  22 discussions on a contingency basis with the Police                  23 Federation and Slater and Gordon to see what, if                  24 anything, can be put in place in principle to deal with                  25 this situation should it arise.</p> <p style="text-align: center;">Page 80</p>

1 MR SANDERS: Sir, yes. Of course. We can just fold that  
 2 into our ongoing dialogue about conflicts and the  
 3 difficulties that there are.  
 4 THE CHAIR: Okay.  
 5 MR SANDERS: Those were the points I wanted to make about  
 6 process.  
 7 Logistics is the second main heading. This is  
 8 really an area where all I can do is really elaborate on  
 9 the potential difficulties that we have. In terms of  
 10 the three, the word used in the strategic review is  
 11 "segments" of evidence, I assume so as not to be  
 12 confused with "tranches" --  
 13 THE CHAIR: No, forgive me, I had forgotten the word.  
 14 Segments, yes, fine.  
 15 MR SANDERS: If it is the case that the segment 1,  
 16 effectively late 1960s/1970s evidence, is to be witness  
 17 statements to be served in October, I think. Then that  
 18 is 30 plus statements to be taken at some point in the  
 19 future, because we don't have any rule 9 requests, we  
 20 don't have any rule 9 packs, we don't know the module 2  
 21 issues. All of those things, it would mean doing --  
 22 just on a rough basis two statements a week, even if we  
 23 were up and running straightaway, with clients who, as  
 24 I say, are all over the country, in some cases all over  
 25 the world. In a situation where proofing and taking

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1 a statement is unlikely -- except perhaps in the  
 2 earliest deployments -- to be a two-hour meeting or even  
 3 a day. I would say most of my clients are probably  
 4 going to take longer.  
 5 THE CHAIR: I would anticipate that at least a day is  
 6 required.  
 7 MR SANDERS: Yes, and more for many of them.  
 8 THE CHAIR: Certainly.  
 9 MR SANDERS: Depending on volume of documents as well. The  
 10 members of my team, junior counsel team, who are going  
 11 to do the proofing are obviously going to have to have  
 12 time to prepare, then to go and meet the individual,  
 13 take statements, draft, go back. It is a significant  
 14 exercise for people who are not just sitting at home  
 15 waiting to be given a witness statement to write. Who  
 16 have lives and commitments and other people to look  
 17 after and jobs and so on.  
 18 Logistically it is very difficult. The things we  
 19 would ask for to assist with that is as many advance  
 20 notice of who is going to get a rule 9 request and when,  
 21 so rather than simply receive the rule 9 requests and  
 22 then pick up the process from there, if we can know in  
 23 advance and have had discussions with the individual to  
 24 know what their holiday dates are or hospital  
 25 appointments are and so on and so forth, that would

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1 assist. And also advance notice of what the deadline  
 2 attaching to any rule 9 request is going to be will  
 3 again assist. First, so we can plan. Second, so if  
 4 that is not going to be logistically achievable we can  
 5 report back to your team as early as possible.  
 6 THE CHAIR: I will have to ask about that, but I will come  
 7 back with an answer today for you.  
 8 I think I should say at this stage that I very much  
 9 appreciate the fact that the designated lawyers team  
 10 were brought into this partway through the process and  
 11 had to hit the ground running and have done so  
 12 effectively. I am grateful to them for their efforts.  
 13 MR SANDERS: I am grateful to you for saying, sir.  
 14 Just a couple of other logistical issues as well,  
 15 just to flag and to emphasise how difficult it is.  
 16 Obviously there is travel, but then there is document  
 17 security and information technology security and taking  
 18 of secret laptops and so on. All those things need to  
 19 be factored in. I think at this stage all I can really  
 20 ask for is as much advance notice as possible.  
 21 THE CHAIR: Yes, as regards ancient deployments. I expect  
 22 that the great majority of the those will not involve  
 23 documents with any degree of classification which makes  
 24 their transport around the country difficult.  
 25 By then they will have been through whatever

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1 redaction process is going to occur and although what an  
 2 officer is shown may not be what is put in the public  
 3 domain, I doubt in the case of early deployments that  
 4 there will be any material difference.  
 5 Therefore, those who present the greatest problem  
 6 from the point of view of health and mobility and so  
 7 forth shouldn't create an opposite difficulty in  
 8 relation to security and the transport of documents.  
 9 When we get to more recent times and in particular  
 10 when we get to cases where there are documents which  
 11 cannot be transported around the country, then they may  
 12 have to come and visit your offices and provide  
 13 statements there.  
 14 MR SANDERS: Sir, yes.  
 15 Either way, there are logistical problems in terms  
 16 of accommodation and so on and so forth.  
 17 Did I understand -- one of your exchanges with  
 18 Mr Hall led us to think that the progress with the IMOS  
 19 database may have produced a greater number of earlier  
 20 documents than was previously thought the case. Is that  
 21 a misreading or --  
 22 THE CHAIR: No, there are, I think, six former undercover  
 23 officers, some at least of whose names, real names, are  
 24 in the public domain and whose activities are of  
 25 significant public interest who will clearly take quite

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1 a time to deal with, both at the preparatory and the  
 2 hearing stages.  
 3 Their materials have already been obtained from  
 4 IMOS. I was not saying any more than that. We also  
 5 have obtained enough to start the Vietnam Solidarity  
 6 Campaign deployments, the early days of the Special  
 7 Operations Squad. You should not read into it any more  
 8 than that.  
 9 MR SANDERS: Understood. Thank you, sir.  
 10 We, I think, raised at the meeting yesterday as to  
 11 whether there would be scope for -- because, obviously  
 12 achieving the logistical side of things, the more  
 13 flexibility there is, the better. One suggestion we  
 14 have made is whether or not there is scope for rather  
 15 than specifying this officer's statement by this  
 16 deadline, specify a certain number of statements by  
 17 a deadline. I don't think it was received very well  
 18 yesterday, but I mean that's a suggestion we would  
 19 favour.  
 20 THE CHAIR: If it wasn't, I don't claim to know exactly what  
 21 was discussed yesterday in detail, but if it was not, it  
 22 is likely to have been based on prior experience when,  
 23 I am afraid, we did find in relation to the anonymity  
 24 process that identifying people and setting a deadline  
 25 worked better than saying, "Can you provide us with

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1 a dozen by 30th of the month" or thereabouts.  
 2 MR SANDERS: Yes. I don't think the latter was ever tried,  
 3 but I understand that internally there was thought given  
 4 to that.  
 5 THE CHAIR: In the end, what I want to do -- and what you  
 6 say and I accept what you say you want to do -- is to  
 7 provide the material which the Inquiry needs, the point  
 8 of view of the Inquiry to obtain the material the  
 9 Inquiry needs, in time for the timetable set out in the  
 10 strategic review to be more or less fulfilled. We are  
 11 ad idem on that. I'm not stuck to doing things in  
 12 particular ways, I will do whatever can achieve that.  
 13 MR SANDERS: Sir, yes. We will obviously endeavour to  
 14 assist you and your team as much as we can.  
 15 THE CHAIR: As you have been, and I acknowledge it.  
 16 MR SANDERS: Thank you.  
 17 I was just going to ask if I could turn around and  
 18 check if there is anything else, but the shorthand  
 19 writers have been going for just over an hour --  
 20 THE CHAIR: It is probably sensible if we stop at 1.00 and  
 21 then come back at 1.55 or something like that.  
 22 MR SANDERS: I am grateful, so may I just take a quick  
 23 moment?  
 24 THE CHAIR: Of course.  
 25 MR SANDERS: Thank you.

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1 Nothing further, thank you, sir.  
 2 THE CHAIR: Thank you.  
 3 Before you sit down, can I mention one thing which  
 4 concerns you? If the numbers of your team prove  
 5 insufficient to deal with the requirements of the  
 6 Inquiry so as to create a risk to the fulfilment of the  
 7 timetable in the strategic review, then I take it that  
 8 (a) you would be willing to recruit more, and (b) the  
 9 commissioner would be willing to assist you to do so?  
 10 MR SANDERS: I can answer the first point, but the second is  
 11 probably for Mr Hall.  
 12 THE CHAIR: Yes.  
 13 MR SANDERS: We have expanded in that we have three more  
 14 junior juniors for the witness statements than we did  
 15 for the restriction orders and we have a third solicitor  
 16 joining end of this month. So we have expanded and,  
 17 subject to the point about funding, we will expand  
 18 further.  
 19 THE CHAIR: I am glad to hear that, because it may be that  
 20 the demands imposed upon the current team do require  
 21 more than are there now.  
 22 MR SANDERS: Yes, indeed, thank you.  
 23 THE CHAIR: Mr Hall, you want to say something about that or  
 24 not?  
 25 MR HALL: I think because the question of funding has been

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1 raised I ought to say something.  
 2 THE CHAIR: I know what you are going to say.  
 3 MR HALL: You do.  
 4 THE CHAIR: That police resources are limited, I acknowledge  
 5 that, that they are better devoted to fighting crime,  
 6 that is a matter for political judgment rather than me,  
 7 but I can understand that point of view.  
 8 MR HALL: That wasn't all.  
 9 I was going to say that we obviously get the point  
 10 about increasing legal resources. We have had some  
 11 useful discussion about that. We get that that can be  
 12 quite an effective way --  
 13 THE CHAIR: Yes.  
 14 MR HALL: We do understand that. I would not want to be  
 15 drawn into specific discussions about funding, partly  
 16 because we are still doing it too much in the abstract.  
 17 THE CHAIR: Yes.  
 18 MR HALL: Once we understand more about the Inquiry, the  
 19 more decisions can be taken with, of course, the caveat  
 20 that, sir, you have which is we can't raise false  
 21 expectations that there is a limitless pot.  
 22 THE CHAIR: Of course not. I readily understand that.  
 23 However I have a task to perform and I am going to  
 24 perform it. If it causes some creaking in the wheels of  
 25 the Metropolitan Police Service and difficulties with

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1 funding, then that may be something that will simply  
2 have to be overcome.  
3 MR HALL: I think rather than respond to that, let's see.  
4 THE CHAIR: Quite. I hope we don't get to that point.  
5 I have no reason to think we will, and I acknowledge the  
6 cooperation that I have is received so far.  
7 Sir Robert, I do not know where you have a lot to  
8 say? If so, would you rather start at 1.55 or --  
9 SIR ROBERT FRANCIS: I can do either. Like Mr Hall I have  
10 about five pages, which could either be condensed  
11 because of your interventions to one page or go on to  
12 six. It might be better to start after the break.  
13 THE CHAIR: Very well. I will rise now and we will start  
14 again at 1.55.  
15 (12.58 pm)  
16 (The short adjournment)  
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