

<p>1 Thursday, 17 January 2019 2 (10.37 am) 3 Opening remarks by COUNSEL TO THE INQUEST 4 THE CORONER: Yes, Mr Skelton. 5 MR SKELTON: Sir, those present will be relieved to hear 6 that today's hearing is unlikely to involve detailed 7 legal arguments or detailed expositions about the 8 evidence. Instead, the focus is going to be on bringing 9 the teams together with your coronial team to work 10 collaboratively on the practical arrangements for 11 adducing evidence at the Inquest which is due to start 12 on 25 February. 13 The time has come now, of course, to fix dates on 14 which particular witnesses will attend; to establish the 15 order in which the evidence will be heard, and to seek 16 to resolve as many outstanding points as we possibly 17 can. 18 Witnesses who are being asked to give evidence now 19 need to be warned to attend on certain days, and some 20 will, of course, need to make arrangements concerning 21 work or child care commitments and so on. Many will 22 find it difficult, undoubtedly, to recount what they saw 23 or heard on the night of 21 November 1974, and knowing 24 that they are required is an important part of their 25 preparation to give evidence.</p> <p style="text-align: center;">Page 1</p>	<p>1 If a decision is required of you, Sir, today, then 2 your counsel will make public submissions on our 3 proposed approach, and Interested Persons will, as 4 necessary, do so if instructed. Our submissions as 5 always carry no additional weight because we are counsel 6 to the Inquest. You must, and we have no doubt you 7 will, consider all of the submissions made before 8 reaching your own independent decision. That is what 9 the law requires. 10 It follows from what I have said that much of 11 today's work will be done in face-to-face meetings 12 outside of the open court proceedings between the 13 lawyers. Before I invite you to rise to allow those 14 discussions to take place, may I just address you on 15 a few particular matters in open court? 16 First, I would like to provide an update on the work 17 done by your team since the last hearing as I have 18 previously done. 19 Second, to provide an outline of the timetable that 20 we propose. 21 Third, to discuss matters concerning Michael Reilly 22 which have been raised by some of the families. 23 Fourth, and lastly, to address some of the other 24 points made in the submissions you have received in 25 writing from the families represented by KRW Law.</p> <p style="text-align: center;">Page 3</p>
<p>1 The same point, Sir, applies with greater force to 2 the families themselves, both those here today and those 3 who are following the proceedings from elsewhere. We 4 recognise that the Inquest will be an exceptionally 5 difficult time for all of them. We will do what we can 6 to help them through it, and establishing a timetable 7 and then doing everything possible to stick to that 8 timetable is part of that. We note that this is the 9 point that you have made repeatedly in the course of the 10 proceedings so far. 11 In short, then, decisions must now be made. It is 12 you, Sir, who has the legal responsibility for making 13 those decisions. We, as your counsel, have made 14 proposals on the evidence to be called. We have done 15 this in the light of your rulings on scope and evidence, 16 and in particular your most recent ruling of 31 December 17 2018. 18 We have provided these to the Interested Persons so 19 that we can use today to discuss outstanding points and 20 to seek to resolve them through dialogue and 21 a collegiate approach. If we can't achieve consensus, 22 then the matter will come back to you for a decision. 23 Depending on the issue, that could be done later today, 24 or in writing in the forthcoming days, or at some later 25 point should more work be required.</p> <p style="text-align: center;">Page 2</p>	<p>1 THE CORONER: Thank you. 2 Update on the Progress of the Inquest by COUNSEL TO THE 3 INQUEST 4 MR SKELTON: So the first of those, the update. Disclosure 5 first. Before yesterday, the Inquest had disclosed some 6 2,838 documents amounting to approximately 28,000 pages. 7 That included 146 documents, a little under 1,300 pages, 8 disclosed since the previous hearing. 9 Yesterday, two further tranches of material were 10 disclosed, meaning that the Inquest has disclosed all 11 materials that it held and that, firstly, those 12 materials have been assessed as relevant or have been 13 disclosed voluntarily under Rules 13 and 15 of the 2013 14 Rules. 15 Included among that disclosure are the reports of 16 Operation Review and Operation Aston. These contain the 17 fruits of those investigations which have never 18 previously been made available to the families. There 19 is much other disclosure that has been provided despite 20 being of peripheral or no relevance to the scope of the 21 Inquest, which is a matter on which I addressed you last 22 time. 23 This has been done to try to assist the families on 24 matters of concern to them and to help them to make 25 arguments on which evidence should be disclosed and</p> <p style="text-align: center;">Page 4</p>

<p>1 adduced and to provide context to the materials that 2 have been considered by your team. The disclosure 3 exercise, as I have previously indicated, has gone well 4 beyond that which you were compelled by law to provide 5 and no relevant evidence has been excluded. 6 There is a lot of material for the Interested 7 Persons and their representatives to consider, and we 8 recognise that documents are not always easy to follow. 9 Indeed, we know that well from our own experience. 10 However, we note the following matters. 11 First, the disclosure has taken place over many 12 months, indeed over more than a year, in incremental 13 stages. 14 Second, Interested Persons have been provided with 15 a great deal of guidance on what is contained in the 16 materials through the initial submissions of WMP, 17 through reports on materials provided by WMP, and by the 18 notes, updates and submissions prepared by your legal 19 team. 20 Third, the material has been provided via 21 a searchable database which has been made available to 22 all Interested Persons. 23 Fourth, at the request of the families, you have 24 delayed the start of the Inquest for two weeks to allow 25 further preparation time.</p> <p style="text-align: center;">Page 5</p>	<p>1 In response, your legal team took on extra lawyers 2 to conduct a thorough review of those redactions. This 3 process has been underway for some months and is 4 ongoing. As a result, some redactions are being 5 removed, and in other cases redactions are being 6 explained. 7 A lot of these redactions concern matters that may 8 be characterised as personal data, for example, 9 addresses, dates of birth and such like. In many 10 instances, this is obvious and requires no further 11 explanation. In other cases, information is being 12 provided to help Interested Persons understand the 13 redactions. 14 Other redactions are made on the grounds that 15 material is both irrelevant to the Inquest and also 16 sensitive. An example may be a witness mentioning 17 someone's extra-marital affair in a statement given to 18 the police decades ago; or a police report that contains 19 details of a criminal offence that is wholly unrelated 20 to the events of 21 November. This material is being 21 redacted so that the rest of the document can be 22 disclosed to Interested Persons and it is a means of 23 maximising both disclosure and transparency. 24 Information is being added to explain those sorts of 25 redactions.</p> <p style="text-align: center;">Page 7</p>
<p>1 Fifth, while there will still be a small amount of 2 documentation that will fall to be disclosed in the 3 coming weeks when we have received it, the overwhelming 4 majority of disclosure has now been completed and will 5 have been completed by the time of this hearing, more 6 than five weeks before the Inquest is due to begin. 7 So a lot of hard work lies ahead for all of the 8 legal teams but we consider the start date is, and 9 remains, realistic and should be met. We will seek to 10 assist in whatever way we can and our door remains open 11 as it has been throughout the proceedings. 12 That is all I propose to say by way of an update on 13 disclosure. 14 Redactions in particular. We heard at the last 15 hearing about the process that your legal team have put 16 in place to review redactions previously made to 17 material disclosed to Interested Persons. 18 The redactions, as I said last time, are 19 provisional. They were made so that as much relevant 20 evidence as could be made available to Interested 21 Persons was made available as early as possible. 22 Concerns were raised to us about the lack of 23 explanation for some of the redactions. This tended to 24 be in relation to materials disclosed some time ago 25 where relevance to the Inquest was often peripheral.</p> <p style="text-align: center;">Page 6</p>	<p>1 We repeat what was said at the last hearing and what 2 is made abundantly clear in your determination. 3 Material that is relevant to the scope of this Inquest 4 has not been redacted. There has been no PII 5 application in this Inquest to date. 6 In terms of progress: 2,400 documents had been 7 disclosed by the end of last year. Of those, 406 had 8 some form of redaction applied by West Midlands Police. 9 All of those documents have been or are being 10 reviewed by your legal team, and this has involved 11 obtaining the original document, reviewing the redaction 12 and, where necessary, providing further information 13 about the redaction. 14 The majority of redactions reviewed thus far are for 15 matters such as the types personal data to which I have 16 referred, the psychological effects of the bombs on 17 individual witnesses, compensation payments and so 18 forth. 19 It is likely that the review will be completed 20 within two weeks, after which documentation will either 21 be released with further information about the redaction 22 in place, or with some redactions removed. 23 We note that this process is intended to provide 24 further clarity about why certain information has been 25 redacted. That is important and we are happy to assist</p> <p style="text-align: center;">Page 8</p>

<p>1 in this way. However, it is not going to result in 2 significant amounts of "new" relevant evidence being 3 disclosed. It is not a reason to delay preparation; nor 4 would it justify delaying the types of discussion that 5 we intend to have today about which witnesses should or 6 should not be called. 7 Finally, on the subject of redactions, we repeat 8 what we have always said: if there are specific 9 redactions or documents about which Interested Persons 10 wish to raise with us, we would be happy to discuss them 11 if that would assist. 12 May I turn then to anonymity? 13 Certain witnesses have been referred to in disclosed 14 materials by ciphers, for example, Witness B or 15 Witness O. Again these ciphers are provisional. In 16 certain instances, you, Sir, as someone exercising 17 a public function, would have a legal duty to protect 18 the identity of a witness or someone referred to in the 19 evidence, for example, because they may come to harm if 20 you didn't do so. Where there is a possibility that 21 such a duty may arise, a cipher has been used. This 22 allows for the material to be disclosed and arguments to 23 be made before a final decision is taken. 24 Your legal team have, directly or indirectly, 25 approached the principal ciphered witnesses in order to</p> <p style="text-align: center;">Page 9</p>	<p>1 national and local. 2 MR SKELTON: Yes. 3 THE CORONER: And obviously the Interested Persons will be 4 able to have their say as well. 5 MR SKELTON: They will, Sir. However, I must flag up it may 6 be necessary for you to sit in private if certain points 7 are raised which cannot be aired publicly. 8 THE CORONER: Yes. 9 MR SKELTON: But for the most part the application will be 10 made in public and with the press present if they choose 11 to be so. 12 THE CORONER: In any event, there will be a public hearing? 13 MR SKELTON: There will, in all cases. 14 THE CORONER: Yes. 15 MR SKELTON: Contact with specific witnesses. 16 At the last hearing your counsel and those 17 representing Interested Persons referred to a number of 18 witnesses whom it was hoped to contact and interview. 19 By way of brief update, we have now interviewed 20 Roy Bunn, Adrian Howles and DPW Daniels. We have 21 contacted Johanna Tonkinson and several of the key 22 witnesses relevant to the Talk of the Town matter, 23 including Witness X. We will discuss these and other 24 witnesses with Interested Persons in our meetings 25 throughout this morning.</p> <p style="text-align: center;">Page 11</p>
<p>1 see if they wish to make formal applications for 2 anonymity. In some cases they have indicated they do 3 not and in due course the ciphers will or may be 4 removed. In other cases formal applications may be 5 pursued, and work is ongoing in respect of those 6 applications. 7 It is an important but obvious point that great care 8 must be taken about that process. The sensitivities and 9 the risks are obvious. We recognise that this means 10 that it can be a slow and sometimes frustrating process 11 and we hope that all present understand why this is so. 12 I add only this. In some cases, a cipher has been 13 used not because an individual is in danger or has 14 requested anonymity, but because revealing his or her 15 identity might identify someone who is at risk. We will 16 explain in our discussions later where that is the case, 17 insofar as we are able to do so. 18 Contact with specific witnesses -- 19 THE CORONER: Just on that point of anonymity -- 20 MR SKELTON: Yes. 21 THE CORONER: -- if there are to be any formal applications, 22 any applications by any potential witness for anonymity, 23 then there will be a public hearing of that application. 24 MR SKELTON: There must be. 25 THE CORONER: The press will be notified in advance of it,</p> <p style="text-align: center;">Page 10</p>	<p>1 The jury. Those families represented by KRW Law 2 requested an update on matters relating to the jury. 3 The questionnaire that was agreed by all Interested 4 Persons was sent out to prospective jurors. Replies 5 were received, and 50 individuals who have not raised 6 any issues in their answers have now been warned to 7 attend for jury selection on the first day. No doubt 8 you, Sir, will have in mind a process by which the jury 9 should be selected, and that will be shared with 10 Interested Persons in due course. 11 We have also circulated a draft index for a jury 12 bundle. That is the document that will be provided to 13 the jury during the course of the Inquest. In addition, 14 we have provided the draft chronologies that we propose 15 to include. We stress that these documents are in draft 16 form. We would welcome thoughts and discussion on them 17 either today or in subsequent correspondence, and will 18 be working with Interested Persons in the same way to 19 select the other items to be contained in the jury 20 bundle. I stress again that this is a collaborative 21 process. 22 Finally, Sir, the Solicitor to the Inquest has, on 23 your instructions, circulated your draft opening. This 24 is the short address that you will give to the jury once 25 they have been sworn in which introduces the Inquest.</p> <p style="text-align: center;">Page 12</p>

<p>1 Again, we would welcome observations from the Interested 2 Persons but we stress that the contents of the opening 3 are, quite properly, a matter for you alone to decide 4 on. 5 I move then to the draft timetable that we have 6 provided. This document is intended to provide 7 a structure for the discussions today. You will see 8 that there is no dispute about most of the witnesses who 9 are listed upon it. 10 You will also see that it is intended to read many 11 of the witnesses under Rule 23 of the Inquest Rules. 12 Regrettably, this is inevitable in an inquest of this 13 nature. 44 years have passed. Memories have faded and 14 witnesses have died; others are now too frail to give 15 evidence. Many witnesses, particularly those who were 16 in the pubs, have physical and mental injuries that last 17 to this day. 18 Your team has been struck, Sir, in conversations 19 with those who were present by the immense difficulties 20 that many of them have thinking back to that night. 21 THE CORONER: Some of them are really quite shocking in 22 their responses. 23 MR SKELTON: And they remain extremely damaged -- 24 THE CORONER: Yes. 25 MR SKELTON: -- it is right, Sir, yes. We are sure that</p> <p style="text-align: center;">Page 13</p>	<p>1 First, the pen portraits. This, as we understand 2 it, reflects the wishes of the families. Although we 3 are referring to the "Inquest" singular now, these are 4 in reality 21 inquests, each for someone's husband, 5 father, wife, child or sibling. Behind this public 6 attack are private tragedies. The individuals are the 7 focus of our work and of these hearings, and we agree 8 that it is right that we begin with the pen portraits. 9 We propose that there is a jury visit thereafter. 10 We will discuss the details with the Interested Persons, 11 but we propose a relatively short visit to the site of 12 the two pubs. 13 It is our suggestion that we then turn in the 14 evidence to the bombings themselves, from the warning 15 given on the evening of 21 November, to the explosions, 16 and then to the rescue efforts in the aftermath. 17 We propose after that to consider the evidence we 18 have in respect of each of the persons who have died. 19 This will include medical and pathology evidence. This 20 will undoubtedly be extremely difficult for the 21 families. We note the point made by Jackson Canter in 22 their submissions about the need for care: we 23 respectfully agree and we will discuss this further with 24 all concerned. Counsellors will be available at court 25 throughout the hearings and a private space has been</p> <p style="text-align: center;">Page 15</p>
<p>1 those present understand this better than anyone else. 2 It follows that much of the evidence will have to be 3 read. We have, on the timetable, set out in each case 4 the legal basis on which we say each witness's account 5 should be read. We ask Interested Persons to identify 6 any instances in which they disagree with that view. We 7 can then discuss the matter further and in due course 8 seek a ruling from you if necessary. 9 The families represented by Jackson Canter have 10 helpfully identified two witnesses in particular whom 11 they seek to call rather than to read. We now know that 12 one, DS Cyril Cooney, has died, and the timetable will 13 be updated accordingly. The other witness is one of 14 those whom we will discuss with them and others later 15 today. 16 We will endeavour to make the read evidence as 17 accessible as possible to the jury, for example, by 18 using visual aids or using recordings of witnesses, or 19 by asking the professional witness, Mr Anthony Mole, to 20 summarise accounts collectively so as to give the jury 21 a better overview. We would also invite you to remind 22 the jury regularly of the importance of the read 23 evidence. 24 Sir, you will see the structure we propose for the 25 evidence.</p> <p style="text-align: center;">Page 14</p>	<p>1 made available for people to talk to them. 2 Our proposal after that is that we move back in time 3 to questions about the background to the bombings, and 4 the question of attribution of the bombings. 5 Finally, we suggest that we turn to the various 6 topics that you have ruled to be in scope, as can be 7 seen in the final pages of the timetable. It is here 8 that many of the discussions today will focus. We note 9 that these include issues of forewarning and that these 10 were largely agreed by Interested Persons at the 11 previous hearing. 12 It may assist if I make a few comments about a few 13 specific points now. 14 First, we note the suggestion by Jackson Canter for 15 an additional day or two at the end of the evidence to 16 take instructions and prepare submissions. We see force 17 in this point. No doubt you, Sir, will have views on 18 how much time should be allowed were you to agree. 19 THE CORONER: Yes. I always thought there would be, 20 obviously, as much time as would be required at that 21 stage. 22 MR SKELTON: Thank you. 23 THE CORONER: Second, both Jackson Canter and KRW raise the 24 point about whether or not the Inquest should sit on 25 Fridays. The timetable proposes not doing so in weeks 3</p> <p style="text-align: center;">Page 16</p>

<p>1 and 4. We suspect that there may be short days in the 2 first two weeks, hence our proposal to sit five days in 3 each of those weeks. We will, of course, discuss this 4 if it is raised in our meetings.</p> <p>5 Third, Jackson Canter raise the absence of an oral 6 witness from inside the Tavern in the Town. It is a 7 point that we, too, have identified and have sought to 8 address. As I said earlier, we have been struck by how 9 difficult those who were present have found it to talk 10 about their memories of that night. We will continue to 11 work on this matter, but we are sure that all understand 12 the need for care and sensitivity about such an issue.</p> <p>13 Fourth, Jackson Canter have asked about pathology 14 evidence. It is our proposal that all medical and 15 pathology evidence should be adduced through our expert 16 witnesses, Dr Cary and those within Professor Bull's 17 team. We don't intend to read the original pathology 18 reports to the jury and we are very clear that the 19 post-mortem photographs should not be shown. We believe 20 that the relevant evidence can be given sensitively and 21 comprehensively by the experts. Again, we will discuss 22 the details of how this is best done with the Interested 23 Persons today. We are very aware that this is a matter 24 that entirely understandably is of great concern to the 25 families and we will listen carefully to what they have</p> <p style="text-align: center;">Page 17</p>	<p>1 same person as Michael Patrick Reilly.</p> <p>2 In our submission, Sir, you are in no place to do 3 this for the following reasons.</p> <p>4 First, and most importantly, you are not in 5 possession of definitive proof of whether or not 6 Mr Reilly is the same person as the Young Planter. That 7 was not a cipher that you ordered to be put in place; it 8 was one adopted by Granada TV and Mr Mullin and applied 9 to materials that they hold and which you do not.</p> <p>10 Second, it is not clear under what legal power you 11 could make such a determination. Presumably you would 12 have to hear evidence both for and against such an 13 identification before adjudicating upon it, but that is 14 not your role in this Inquest. The tribunal of fact is 15 the jury and this is not a question that it is suggested 16 can go before them.</p> <p>17 Third, the evidence cited by KRW Law is in our view 18 evidence that is concerned with what has been called the 19 "perpetrator issue": namely who planned, procured, 20 planted and authorised the bombings. It doesn't go to 21 the forewarning issue, namely whether state agencies, 22 including West Midlands Police, had advance warning of 23 the bombings. Nothing in the statements that are cited 24 suggest such state forewarning. The perpetrator issue 25 is out of scope for the reasons that you have previously</p> <p style="text-align: center;">Page 19</p>
<p>1 to say and work with them to achieve the best outcome.</p> <p>2 Finally, I will not address you here, Sir, on the 3 other points made in the submissions about specific 4 witnesses. We are going to discuss these outside the 5 hearing and turn to you for determination if and when 6 required.</p> <p>7 May I then turn briefly to my third topic, Michael 8 Reilly?</p> <p>9 In the 1990 Granada TV broadcast dramatisation 10 called "Who bombed Birmingham?", there were five people 11 identified as being involved in the bombings. Four of 12 these were named but the last was referred to as "the 13 Young Planter". That was a decision made by Granada TV 14 who cited legal reasons for doing so. The same 15 pseudonym was used by Chris Mullin in his book "Error of 16 Judgement", though Mr Mullin did not name any of those 17 whom he suspected of involvement in the bombings.</p> <p>18 A TV documentary made by John Ware last year 19 revisited this matter and it identified the Young 20 Planter as Michael Reilly and gave reasons for that 21 identification. Mr Reilly issued a statement through 22 his solicitor denying the suggestion that he was 23 involved in the Birmingham bombings.</p> <p>24 KRW raised this in their submissions and invite the 25 Coroner, you, to confirm that the Young Planter is the</p> <p style="text-align: center;">Page 18</p>	<p>1 given which the Court of Appeal held to be correct.</p> <p>2 There are, however, documents that have been 3 disclosed to Interested Persons in which officers from 4 Operation Review expressed an opinion on who the Young 5 Planter was. The name or names that have been given to 6 date have been redacted. If there is a proposal to 7 remove those redactions, then this will be considered on 8 its own merits, including by giving all concerned an 9 opportunity to make submissions. But that is different 10 from you, Sir, adjudicating on this matter as a finding 11 of fact.</p> <p>12 Finally, Sir, a few points in response to those 13 raised by KRW Law.</p> <p>14 First, the disclosure of documents relating to 15 police policies and procedures, which was raised in 16 a letter sent to you yesterday by KRW Law.</p> <p>17 Your team have already made extensive inquiries of 18 the type suggested. It has kept Interested Persons 19 fully informed of those inquiries over the past 20 18 months through correspondence and update notes. 21 Requests for searches have been made of West Midlands 22 Police, including their museum; the Metropolitan Police 23 Service; Her Majesty's Government, in particular the 24 Home Office; the College of Policing; and what is now 25 the National Police Chiefs' Council, previously the</p> <p style="text-align: center;">Page 20</p>

<p>1 Association of Chief Police Officers or ACPO. 2 Your counsel have inspected various documents. Very 3 few documents have been identified as being even 4 potentially relevant. This may be regrettable, but it 5 is not for want of effort. 6 1974 was, in policing terms, a very different world 7 from today. It appears that few written policies or 8 instructions of the type referred to by KRW Law were in 9 fact created. Those documents that we have found, in 10 particular from the archive of the National Police 11 Chiefs' Council in Hull and from the College of 12 Policing, have been disclosed and details of that were 13 provided in an email from the Solicitor to the Inquest 14 dated 26 May 2017, and in an update note dated 15 14 September that year. 16 We don't think that further searches will produce 17 a different result. We note what KRW Law say about 18 Kingsmills. The fact that a different police force at 19 a later date did produce policy documents is unlikely to 20 assist you or the jury in this Inquest. However, if 21 there are materials of potential relevance about which 22 KRW are aware, we would be pleased to see and discuss 23 them. 24 Second, there is a proposal to request further 25 witness statements from state agencies to answer the</p> <p style="text-align: center;">Page 21</p>	<p>1 statements explaining how the searches were conducted 2 and these have been disclosed to the Interested Persons. 3 In our submission, the process that has been adopted 4 has been thorough and it doesn't give rise to any 5 concerns that material has been improperly withheld from 6 you. Your team have questioned and probed throughout 7 the process, asking for stones to be turned over and 8 further avenues to be explored. No request has been 9 refused, and they have revealed no materials of 10 relevance. In those circumstances, our provisional view 11 is that it is not necessary to seek the statements that 12 are being proposed by KRW Law. 13 Nor do we think that such statements or oral 14 questioning would allay rumour or suspicion. The 15 witness or witnesses would inevitably be limited in the 16 detail that he or she could give in open court, and we 17 think that some of the questions posed, such as what the 18 witness would expect to see, are too vague to allow for 19 a helpful answer. We don't think that public knowledge 20 of the processes followed would be informed or assisted 21 by such evidence. 22 After 44 years, it is unrealistic to expect that all 23 contemporaneous records have survived. It is also 24 unrealistic to expect all papers to be found and 25 reconstructed into a perfect and complete archive. No</p> <p style="text-align: center;">Page 23</p>
<p>1 question on disclosure posed at paragraph 33 of 2 KRW's submissions. It is also suggested that you give 3 consideration to calling relevant witnesses to be 4 questioned at a further PIR. 5 We note that the Government are not represented here 6 today but have written requesting the opportunity to 7 make further submissions on this matter were you minded 8 to take it further. 9 Our provisional view, as your counsel, is as 10 follows. The public duty to investigate the deaths lies 11 with you. It is for you to discharge that duty, 12 including by relevant evidence from individual persons 13 or institutions, and it is for you to satisfy yourself 14 that reasonable searches have been made and that 15 relevant materials have been provided. 16 In our submission, the investigation that you have 17 conducted has been thorough and you have been provided 18 with access to the potentially relevant materials either 19 directly or through members of your team. That 20 potentially relevant material has been assessed and, for 21 reasons given at the last hearing, it was not disclosed 22 because it was not relevant. In short, there is no 23 evidence of involvement of a state agent or informant in 24 the bombings. 25 You have also been provided with disclosure</p> <p style="text-align: center;">Page 22</p>	<p>1 researcher, whether legal or historical, would ever 2 expect that. The unsurprising fact that some materials 3 have not been found does not, in light of the 4 explanations provided, warrant the exercise that is now 5 being proposed. 6 We have sought to be as transparent as possible, 7 through providing update notes, through our written 8 submissions, through our detailed notes and through the 9 many PIRs that have been held. We understand why the 10 families, entirely legitimately, wish to push for more, 11 but we must also make progress with the relevant 12 evidence which is going to be put before the jury. 13 While we are happy to discuss matters further with 14 KRW Law and others, as I say our provisional view is 15 that we don't think a further round of formal statements 16 will assist you; nor do we consider that it will be 17 proportionate in all of the circumstances. 18 It may be that the families in due course approach 19 other agencies and institutions for further disclosure 20 to answer their questions, particularly about the 21 perpetrator issue, but that is not a function for this 22 Inquest. Disclosure here must be focused on that which 23 will assist the jury in answering the four statutory 24 questions that will be addressed to them ultimately. 25 Briefly, then, Sir, on the other points raised.</p> <p style="text-align: center;">Page 24</p>

<p>1 Firstly, we don't see the need for a Garda witness, nor 2 do we understand the evidence that such a witness could 3 give. It is our understanding that Irish law does not 4 in fact permit a witness of that sort to give evidence 5 at the present time, and the Inquest would have to be 6 adjourned indefinitely to accommodate such a witness. 7 We note the submissions in respect of 8 Professor McGovern. In your determination of 9 31 December you decided he would not be called. KRW Law 10 raise no new argument in this respect and simply ask you 11 to reconsider the position. We remain of the view 12 previously expressed and invite you to maintain your 13 previous decision. 14 So far as PSNI disclosure is concerned, we repeat 15 the points previously made. We don't see the need for 16 a further statement from the PSNI. 17 As to the matter of the so-called "Liverpool 18 connection", and on the other witnesses raised, we will 19 discuss these matters, if we can, over the course of 20 today with KRW Law and their representatives to seek to 21 understand their position further. 22 In conclusion, Sir, unless I can assist further that 23 was all I intended to say for now. After any 24 submissions that the Interested Persons would like to 25 make to you now, I suggest that you rise to allow</p> <p style="text-align: center;">Page 25</p>	<p>1 I addressed in response to Mr Skelton's comments on two 2 issues. They are both covered by the topic of 3 disclosure and they relate to, if I may put this way, 4 our two primary applications today. 5 THE CORONER: Yes. 6 MR MORGAN: The first is, as is set out at paragraph 33 of 7 our written submissions -- 8 THE CORONER: Yes. 9 MR MORGAN: Where the families which we represent in the 10 context of concerns that the state agencies may not have 11 been able to locate all of the evidence in relation to 12 events before, during and after these atrocities, that 13 they and we wish for some formal clarification as to the 14 process that has been undertaken by West Midlands 15 Police, the Police Service of Northern Ireland, MI5, MI6 16 and the Ministry of Defence. So what we seek is -- 17 THE CORONER: Just give me that list again. I may have 18 missed one out. 19 MR MORGAN: West Midlands Police, Police Service of 20 Northern Ireland, MI5, if I may call it that, MI6, if 21 I may call it that. 22 THE CORONER: Yes. 23 MR MORGAN: And finally the Ministry of Defence. 24 THE CORONER: Thank you. 25 MR MORGAN: The way in which I would represent this, sir, is</p> <p style="text-align: center;">Page 27</p>
<p>1 discussions to take place over the course of the morning 2 and early afternoon with the various representatives. 3 We will keep you updated as to those discussions and 4 whether or not it is appropriate for you to return to 5 court if you should wish to do so. That was all 6 I proposed to say. Yes, thank you. 7 Does anybody wish to say anything at this stage? Or 8 later? I shall be here. 9 Mr Morgan? 10 MR MORGAN: Yes, sir. 11 THE CORONER: Thank you for coming back. 12 MR MORGAN: Thank you very much. 13 I wish to seek your view as to whether you would 14 like me to address you now on the issues of disclosure 15 which are raised in our submissions. 16 I think in our written submissions a lot of issues 17 have been raised and we hope that a lot of those issues 18 can be resolved today in discussions as is provided, so 19 I don't intend to go into the detail on that now, 20 because I believe we can deal with practical matters 21 today. 22 THE CORONER: Yes. 23 MR MORGAN: Which we can grateful for you making provision 24 for. 25 I just wonder if it would assist you if at this time</p> <p style="text-align: center;">Page 26</p>	<p>1 that -- and I would like to address you in detail if 2 I may, because it is something that the families that 3 instruct us and we represent feel very strongly about 4 this -- we would like to have clarity that when the 5 legal representatives for West Midlands Police, for MI5, 6 MI6, say they can't find any evidence -- documentary 7 evidence -- of forewarning, and they can't find any 8 evidence that there was an agent or informer involved in 9 the bombings, that the proper process has been followed. 10 It is, as you know, sir, very well, akin to a sworn 11 list of documents in what I may call standard High Court 12 litigation. So that is the first thing we would wish to 13 move today, sir. It is sworn documents from relevant 14 people that the search for evidence on those two issues, 15 sir, has been conducted in the way one would expect in 16 the context of an Article 2 inquest. Mr Skelton has 17 made clear his provisional view on that. 18 The second application we would wish to make today 19 is in relation to the letter from my instructing 20 solicitors, KRW Law, dated yesterday regarding what, if 21 I may call a request for the policies, procedures and 22 protocols of how the security forces what I would call 23 the relevant time -- so perhaps from 1969 onwards, 24 meaning the beginning of The Troubles, sir, to include 25 the IRA bombing campaign in England and particularly in</p> <p style="text-align: center;">Page 28</p>

<p>1 the Midlands in 1973 and 1974</p> <p>2 In very brief summary, we have not seen the policies</p> <p>3 and protocols dealing with, by way of example, the</p> <p>4 approach to deal with the IRA bombing campaign; the</p> <p>5 recommended approach to deal with circumstances where</p> <p>6 a bomb warning has been given in advance; the</p> <p>7 recommended approach where a bomb detonates; the</p> <p>8 recommended approach where a bomb is planted but does</p> <p>9 not detonate, which is what we have in this situation in</p> <p>10 the premises at Hagley Road; the recommended approach</p> <p>11 where we have persons killed and injured in the</p> <p>12 aftermath of a bomb.</p> <p>13 Sir, this applies to the security services. I think</p> <p>14 primarily the police, but all the security services who</p> <p>15 were involved in the process of dealing with the bombing</p> <p>16 campaign that the people of England were exposed to in</p> <p>17 the period from 1969 onwards, but particularly in the</p> <p>18 period 1973 and 1974.</p> <p>19 THE CORONER: If none are found, you will be able to ask</p> <p>20 police officers at the scene what they were doing and</p> <p>21 whether they were instructed to do that or anything</p> <p>22 else.</p> <p>23 MR MORGAN: Yes, sir. My only concern is that the police</p> <p>24 officers that find themselves responding to an emergency</p> <p>25 call on the night of 21 November may not be trained or</p> <p style="text-align: center;">Page 29</p>	<p>1 policy complied with? And finally, if the policy was</p> <p>2 not complied with, what is the explanation for that?</p> <p>3 I don't want to get into the detail of my</p> <p>4 submissions, sir, because I don't want to interfere with</p> <p>5 how you wish to conduct today, but the point being that</p> <p>6 the bombing campaign began in 1969. These atrocities</p> <p>7 did not come out of the blue. Five years after what</p> <p>8 I will say is the beginning of wide scale violence on</p> <p>9 the part of the United Kingdom in Northern Ireland, we</p> <p>10 had a progression of incendiary explosive devices</p> <p>11 throughout England, in several parts of England leading</p> <p>12 to the wide-scale loss of life, also damage to property,</p> <p>13 huge injuries. In the Midlands area alone,</p> <p>14 approximately 50 devices in the period 1973 to 1974 --</p> <p>15 THE CORONER: More.</p> <p>16 MR MORGAN: Yes. And we would like to understand what was</p> <p>17 the security force response to this, or was it just left</p> <p>18 to the officers on the beat to deal with when they were</p> <p>19 confronted with, which in this case was an act of mass</p> <p>20 murder.</p> <p>21 THE CORONER: By "security services" or "security forces",</p> <p>22 who do you mean precisely?</p> <p>23 MR MORGAN: West Midlands Police, sir, primarily.</p> <p>24 Because I think, if I may venture, they were on the</p> <p>25 front line of dealing with these devices as they were</p> <p style="text-align: center;">Page 31</p>
<p>1 briefed on the response -- the proper response -- to the</p> <p>2 IRA bombing campaign.</p> <p>3 It would not surprise me, if I may speculate, sir,</p> <p>4 that the officer or officers said "I am afraid I can't</p> <p>5 comment on that, I was a bobby on duty, and for whatever</p> <p>6 reason I was not aware of the bomb."</p> <p>7 THE CORONER: So what is point -- the practical point -- for</p> <p>8 the purposes of evidence that you would be seeking?</p> <p>9 That they were wrongly instructed or that they acted</p> <p>10 wrongly?</p> <p>11 MR MORGAN: Potentially. But of more relevance --</p> <p>12 THE CORONER: Yes.</p> <p>13 MR MORGAN: -- and primarily relevance --</p> <p>14 THE CORONER: Yes, I don't see the link at the moment.</p> <p>15 MR MORGAN: Okay. I will explain that now. I apologise for</p> <p>16 that.</p> <p>17 If I may be frank, the primary relevance is we would</p> <p>18 like to know if the security forces had a plan in place</p> <p>19 to deal with IRA bombs.</p> <p>20 There were approximately --</p> <p>21 THE CORONER: And if they did?</p> <p>22 MR MORGAN: Did they comply with it?</p> <p>23 THE CORONER: In their instructions or in the response?</p> <p>24 MR MORGAN: So was there a policy; was that policy fit for</p> <p>25 purpose? In the case of these bombings, sir, was that</p> <p style="text-align: center;">Page 30</p>	<p>1 planted and exploding in Birmingham and Coventry and</p> <p>2 surrounding areas.</p> <p>3 West Midlands Police, but also you would expect --</p> <p>4 and within West Midlands Police, police, sir, Special</p> <p>5 Branch, particular responsibility you would have</p> <p>6 thought, for dealing with a terrorist campaign.</p> <p>7 In addition, the security service MI5, you would</p> <p>8 have thought given that we had intelligence briefings to</p> <p>9 the Cabinet on the IRA bombing campaign in general --</p> <p>10 the campaign at that time, the joint Intelligence</p> <p>11 Committee -- we know there were records in October,</p> <p>12 November and December and we also know they have now</p> <p>13 been lost.</p> <p>14 I am sure if these things are being discussed, at</p> <p>15 a Cabinet level then the police, MI5, perhaps MI6,</p> <p>16 perhaps the Ministry of Defence would have protocols,</p> <p>17 policies, standing orders dealing with issues which have</p> <p>18 centrality in this case, which are in some way what to</p> <p>19 do if you have 11 minutes notice that there are bombs</p> <p>20 located in Birmingham City Centre. For example, search</p> <p>21 techniques, evacuation techniques, addressing resource</p> <p>22 issues; if a bomb is located, how do they ensure that</p> <p>23 there is adequate search parties. That there is proper</p> <p>24 prioritisation of those buildings or parts of premises</p> <p>25 that should be evacuated first. What to do in the event</p> <p style="text-align: center;">Page 32</p>

<p>1 a bomb detonates. 2 As I have said, what to do in the event a bomb is 3 located and does not detonate. That obviously is of 4 huge relevance for the identifying and obtaining 5 evidence that may point to the perpetrators. So it has 6 relevance for the security services, sir, but it also 7 has some relevance for the emergency services, meaning 8 the Ambulance Service, the Fire Brigade but also the 9 hospitals, sir. 10 On 21 November, the hospitals in Birmingham were 11 confronted -- 12 THE CORONER: I think we have some evidence about that. 13 MR MORGAN: Yes. As I say, it is that general point. 14 THE CORONER: As to what would happen in an emergency. 15 MR MORGAN: Yes. And in terms of dealing with the injured 16 and seriously injured individuals. 17 THE CORONER: Yes. 18 MR MORGAN: So, we believe that there would have been or 19 should have been at the very highest level efficient 20 direction as to how to deal with this bombing campaign. 21 If I may say, as a general point it appears to me that 22 this was a threat of violence to the people in England 23 at the time which had not been seen since World War II, 24 incendiary and explosive devices being detonated 25 throughout England. There had been loss of life and we</p> <p style="text-align: center;">Page 33</p>	<p>1 understand context -- 2 THE CORONER: I thought you just had. 3 MR MORGAN: I would wish, if I may, in light of 4 Mr Skeleton's considered view that they are 5 provisionally not in agreement to those two 6 applications, I would ask on behalf of the families we 7 represent to address their provisional view but also 8 have the opportunity to persuade you on this point. 9 THE CORONER: Yes. It is probably better if you have the 10 discussion first. It may not help, but it may help. 11 MR MORGAN: Yes. 12 THE CORONER: Then of course I will hear you. 13 MR MORGAN: So if time could be allocated today for those 14 two points. 15 THE CORONER: Yes. 16 MR MORGAN: Specifically. 17 THE CORONER: Certainly. 18 MR MORGAN: I know the families that I represent have been 19 very vocal this morning, sir, in wishing you to fully 20 understand our position. 21 THE CORONER: Yes. 22 MR MORGAN: In terms of the other points, I think we can 23 ventilate them in the remaining time that has been 24 allocated and then return any outstanding issues to you 25 later.</p> <p style="text-align: center;">Page 35</p>
<p>1 would have thought the security services properly given 2 their responsibilities and duties would have formulated 3 a plan to deal with that rather than the alternative 4 which is the police officers who, if I may put it, are 5 on the beat or who come across an event like this and 6 have to just use their professional discretion which is 7 unrealistic, I would say, in the majority of cases. 8 So I think it is relevant, sir. I apologise if 9 I have probably gone into too much detail at this point, 10 given I wished to just stand up and ask how you wished 11 to deal with it, but it has relevance because if there 12 are policies we need to consider were they fit for 13 purpose; we need to consider were they applied and if 14 they weren't applied why were they not applied? 15 There may be good reasons for that, but we need to 16 understand that. If there weren't policies to deal with 17 this campaign of bombing, I think that's a matter of 18 central relevance. It may be something that can be 19 properly dealt with very briefly but in terms of the 20 conclusions that may be reached, and in terms of lessons 21 that could be learnt, I think that's something that the 22 jury should properly consider. 23 So today we would like to raise a number of issues 24 but if I may those two issues are what I would like to 25 address you on in some detail. I can do that now so we</p> <p style="text-align: center;">Page 34</p>	<p>1 On those two points, did you have any comments or 2 questions you would like to raise at this time, sir? 3 THE CORONER: Not at the moment, thank you. 4 Thank you very much. 5 Ms Patrick? 6 MS PATRICK: Sir, I think we will reserve our position until 7 we have had conversation with your legal team and then 8 revert, including on any points that we have to add to 9 the submissions being made by Mr Morgan on policies and 10 procedures. 11 THE CORONER: Yes, thank you very much. 12 Yes, Mr Cohen? 13 MR COHEN: Sir, on behalf of WMP, I can confirm that the 14 Chief Constable's approach is always -- and I hope has 15 always been -- to assist you as much as possible in 16 bringing these Inquests to a conclusion. 17 To that end, we have carefully considered the 18 KRW submissions. We are in a position to have 19 discussions with your legal team and with others about 20 some of the requests. Some of the requests are already 21 the subject of ongoing work in cooperation with your 22 legal team, and it is perhaps best if I simply say that 23 and confirm our desire and willingness to cooperate 24 today. 25 Sir, the question of whether or not you should</p> <p style="text-align: center;">Page 36</p>

1 direct some form of sworn statement -- perhaps just
 2 a statement -- from those involved in the disclosure
 3 process may be a matter to return to. My submission at
 4 the present time, sir, is that that would be a very
 5 unusual step in the coronial jurisdiction and one might
 6 observe in circumstances in which your counsel have
 7 confirmed that they have received complete cooperation
 8 from the police, where the police have not sought to
 9 make any PII application in relation to relevant
 10 material, that in those circumstances it would be
 11 somewhat surprising if the court felt it was necessary
 12 to direct further formal statements in relation to
 13 disclosure when your legal team has, as Mr Skelton QC
 14 has already explained, when your legal team have already
 15 probed and considered disclosure to date and ensured
 16 that a robust and rigorous process is followed. But
 17 sir, I may have to return to that in due course subject
 18 to the outcome of discussions.
 19 THE CORONER: Yes, thank you.
 20 MR SKELTON: Sir, may I just briefly come back on the issue
 21 of policies and procedures.
 22 THE CORONER: Yes.
 23 MR SKELTON: It may be to some extent I'm repeating what
 24 I said earlier, but in light of the way Mr Morgan
 25 articulated his clients' position, I just want to make

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1 absolutely clear that we agree that any relevant
 2 policies and procedures we can find, we would disclose
 3 and --
 4 THE CORONER: We have been looking for them.
 5 MR SKELTON: We have been looking for them, and have been
 6 looking for them for years.
 7 THE CORONER: Up hill and down dale.
 8 MR SKELTON: Indeed. The kind of things that Mr Morgan
 9 identifies, policies that may govern responses to
 10 terrorist warnings and attacks themselves are exactly
 11 the kind of thing we have been looking for so that we
 12 can assess the relevant events and put them in their
 13 proper policy context and ask witnesses the appropriate
 14 questions about whether or not they did or didn't do the
 15 appropriate thing in response to what they received at
 16 the time.
 17 THE CORONER: Yes. Whether there was a policy, whether it
 18 was disseminated, whether it was acted upon and whether
 19 it was acted upon correctly.
 20 MR SKELTON: Yes. So the answer is we have asked, and we
 21 have not found very much at all for the reasons I have
 22 indicated before.
 23 Whether it is possible to discern that policies have
 24 existed and disappeared, or never existed in the first
 25 place, is quite a difficult thing to do at this remove,

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1 but that is something that we will think about further.
 2 The fact is we have found such minimal material that
 3 it is not really going to advance the jury's
 4 deliberations much further, trying to deal with that
 5 issue at this remove. But we can speak to Mr Morgan and
 6 hopefully assuage some concerns about that later.
 7 THE CORONER: Yes.
 8 MR SKELTON: Thank you.
 9 THE CORONER: Yes, well, thank you all very much. I will
 10 rise and let you get on with it.
 11 (11.30 am)
 12 (The inquest adjourned for discussion between the parties)
 13 (3.45 pm)
 14 Submissions by COUNSEL TO THE INQUEST
 15 THE CORONER: Yes.
 16 MR SKELTON: Sir, thank you very much for your patience
 17 today. It has been a long day of very constructive and
 18 useful discussions, first of all with both sets of
 19 representatives of the families together for several
 20 hours, and latterly with West Midlands Police and the
 21 primary Interested Persons in this Inquest.
 22 We went through a range of subjects. I need not
 23 trouble you with the detail of all of them. Suffice to
 24 say we have discussed matters of disclosure, witnesses,
 25 timetable and matters such as pen picture, jury visit

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1 and so on. We have reached a large measure of agreement
 2 on almost all of those matters with some outstanding
 3 matters to be dealt with.
 4 I don't think I need to address you on any
 5 particular issues unless you would like me to at this
 6 stage. I understand that Mr Morgan has some short
 7 submissions he would like to make on matters of
 8 particular concern to his clients which I may respond to
 9 as necessary afterwards.
 10 THE CORONER: Yes, thank you. I'm grateful to everybody for
 11 their work in private today.
 12 Submissions on behalf of the families represented by KRW Law
 13 by MR MORGAN
 14 MR MORGAN: Thank you, Sir.
 15 I would very briefly echo the comments of
 16 Mr Skelton. We have had a collaborative process today
 17 which has focused on legal and practical issues.
 18 In particular, if I may say so, we spent an extended
 19 period of time talking about the needs and welfare of
 20 the families of the deceased during this Inquest, and
 21 ensuring that whilst this will be a very demanding
 22 process for them emotionally, I think everyone -- and
 23 I say this with no fear of contradiction -- is trying to
 24 create a structure whereby they can be supported in
 25 managing this the best they can.

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<p>1 I know literally every effort is being made to try 2 to do that on behalf of your team and others. So on 3 behalf of the families I would like to register my 4 appreciation of that point. I think it is necessary but 5 also is a very encouraging point, so thank you for that. 6 Sir, we have discussed an extremely broad range of 7 topics this morning. We have, in our written 8 submissions dated 15 January, addressed a very broad 9 range of issues and I think they will be dealt with in 10 due course. What I would just like to do is touch upon 11 the issue of disclosure if I may, which is what 12 I mentioned this morning. 13 I don't plan on raising any other issues beyond 14 that. I think they are addressed in our written 15 submissions, unless you have questions, at which point 16 I would certainly address those. But in terms of 17 timetabling, I propose to address you on disclosure and 18 nothing else. 19 Sir, if I may, before I get into the specifics of 20 disclosure, if I may address you briefly on the context 21 of this Article 2 Inquest, the right to life., which 22 I believe has relevance for some of the specific topics 23 I will address you on today, namely, one, the provision 24 of sworn documents as to the 11 questions that we would 25 like the appropriate person at each state agency to</p> <p style="text-align: center;">Page 41</p>	<p>1 told that documents exist but are not relevant, or that 2 documents indeed do not exist, or simply being told by 3 the legal representative of a particular agency no 4 evidence exists. 5 Those things are appropriate. They are proper. 6 They are necessary. But respectfully, Sir, they are 7 only part of the process. As you and your team will be 8 aware, Sir, the legal obligations and duties of an 9 Article 2 Inquest go further than that depending upon 10 the circumstances. 11 I would submit, Sir, that an effective Article 2 12 Inquest includes, where it is reasonable and 13 proportionate, the participation of the families and 14 their legal teams on issues like clearly defined aspects 15 of what is being investigated. So issues within 16 discovery. 17 I would suggest that in the context of an Article 2 18 Inquest, the legal teams representing the families 19 should be given an opportunity to review and understand 20 what the state agencies are saying. In this issue we 21 are confronted with what are two highly controversial 22 and difficult issues, which are: did a state agency have 23 forewarning of the bomb, and was an agent or informer 24 involved in some way? 25 These are not easy things to deal with for a variety</p> <p style="text-align: center;">Page 43</p>
<p>1 answer in writing, and that is set out at paragraph 33 2 of our written submission. 3 The second point I would like to address you on is 4 the documentation we have requested in the letter of 5 KRW Law dated yesterday, which in short is to do with 6 the policies procedures and protocols on dealing with 7 terrorist campaigns, bombings and the response to such. 8 Sir, I know you will be very familiar in respect of 9 the obligations of an Article 2 Inquest. But for the 10 purpose of the families that we represent, I think they 11 should hear and understand what I will briefly outline, 12 and also because it is relevant for the debate about 13 disclosure which we feel is very live. 14 Sir, in order to be compliant with an Article 2 15 Inquest, there has to be an effective investigation. So 16 addressing the issue of an effective investigation, 17 I know it is clear to you and your legal team that 18 disclosure, or to put it another way the evidence, is at 19 the heart of the process. 20 Unavoidably, the evidence, the documents and what 21 efforts have been taken to identify evidence provides 22 the foundation for the jury to make conclusions. But as 23 will be clear to you, Sir, disclosure in this context -- 24 an Article 2 inInquest but also in this specific 25 Inquest -- is not just the families and others being</p> <p style="text-align: center;">Page 42</p>	<p>1 of reasons. But we feel that the families should feel 2 that their representatives have clarity and oversight 3 and, if needed -- because it may not be needed -- if 4 needed an input into proving that process, or asking the 5 question that may then generate an answer that deals 6 with the point. 7 So, Sir, if you could give us the opportunity to 8 make submissions as to relevance of particular documents 9 or classes of document -- and I think this may relate 10 more to the letter which KRW sent yesterday, but it does 11 have general application in the context of disclosure -- 12 if we could make submissions as to this, it may be that 13 you agree or disagree with some of our points and our 14 positions, and this would be a normal part of the 15 process. But once again it is process. 16 On the last occasion, I referred to the disclosure 17 being the golden thread that runs through this, which 18 allows you and the jury to perform your tasks. But 19 actually, we need to take a step back and ensure that 20 the disclosure is complete and where there are omissions 21 we understand that there are omissions. I will come 22 back to that important point in due course. 23 I would simply request that one does not close one's 24 mind to the possibility that some of these documents 25 could lead on to inquiries or avenues of inquiry that</p> <p style="text-align: center;">Page 44</p>

<p>1 could assist this process. That has particular 2 relevance in terms of the protocols and policies on 3 dealing with terrorism in general, attacks, and in 4 particular bomb attacks at the relevant time. That is 5 something we would really like to address you on when 6 the Inquest begins and would really assist us when we 7 have clarity on what the position was between 1969 and 8 1974; what existed and did not exist; what was done, 9 rather than us making certive submissions without having 10 any documentary or evidential basis.</p> <p>11 Sir, as a general point I would suggest that whether 12 we trust the state agencies and security services or not 13 is not the correct test in the context of an Article 2 14 Inquest and in particular this Inquest. We are not 15 impugning them, and we are not impugning those that 16 represent them. That position is definitive.</p> <p>17 What we are doing is trying to participate and 18 contribute to the process to assist with what we hope 19 will be the most effective investigation that we can 20 muster.</p> <p>21 For that reason we say that in this context trusting 22 what a solicitor of a state agency has said is part of 23 the process and necessary and we do respect that, but in 24 certain circumstances it cannot be the end of the story. 25 We do not wish to suggest that we do not trust that</p> <p style="text-align: center;">Page 45</p>	<p>1 local officers or staff provided their own training, 2 then we will take that into account.</p> <p>3 As a general point , Sir, you stated previously that 4 you would and are keeping scope under review and what we 5 seek today, I believe, allows that process of review to 6 be a live and active one. One where all the parties 7 have the opportunity to engage with you, Sir, to shape 8 the scope, evidence and direction of the Inquest. 9 Particularly before it begins, before we get into the 10 evidence.</p> <p>11 We are here to assist you and we are here to assist 12 the jury and we believe that the additional sworn 13 statements we seek from the separate state agencies 14 which are for the purpose of clarity the West Midlands 15 Police, the Police Service of Northern Ireland, the 16 security service or MI5, the secret ^^ service or MI6, 17 and the Ministry of Defence. We believe that those 18 additional sworn statements as to what they have done 19 and also the additional policy and protocol documents 20 outlined in the letter of KRW Law yesterday will assist 21 you and the jury in what is a demanding task. I will 22 come on to the specifics of that, those matters, in due 23 course.</p> <p>24 Sir, it was to be hoped that the Inquest and the 25 process leading up to such would dispel the rumour and</p> <p style="text-align: center;">Page 47</p>
<p>1 process but we suggest that in this circumstance it does 2 not discharge the Article 2 obligation.</p> <p>3 Practically, it is also possible that a review of 4 documents and the disclosure process may bring up issues 5 not thought of previously. It may lead you, Sir, or the 6 jury, down lines of inquiry to help understand better 7 the context of November 1974. If you are asked to 8 consider the response of the security forces to what 9 happened on the night, or the emergency services, 10 informing views as to what decisions individuals took 11 that night -- as I say professional individuals, members 12 of the police and the ambulance service -- it may assist 13 you to know what guidance, training, advice or direction 14 they have received in advance.</p> <p>15 I think it is a point of obviousness but it is one 16 that we shouldn't forget that those individuals that 17 tried to assist the dying and injured that night were 18 confronted with a scene that is almost beyond 19 comprehension. We have seen and read descriptions of 20 what they were confronted with and how they attempted to 21 manage that situation is one that currently one imagines 22 to be of supreme difficulty and that's why how they were 23 prepared for such we believe is relevant.</p> <p>24 If we get clarification that this was dealt with in 25 a different way, operationally, and local individuals or</p> <p style="text-align: center;">Page 46</p>	<p>1 suspicion that has circulated as to the events of 2 21 November 1974, but also, in relation to the acts of 3 certain state agencies. This was mentioned on 18 4 December when we appeared before you previously and it 5 is an unavoidable reality of the Birmingham pub bombings 6 that there is speculation, rumour, allegation. We have 7 multiple news and television stories as to what happened 8 and what didn't happen, which one might justifiably feel 9 is harmful because it distracts one from the real 10 issues. Or it is harmful because it unnecessarily 11 impugns the reputation of governmental agencies. Or it 12 prevents the families of the deceased achieving closure 13 or dealing with their grief or anger.</p> <p>14 One of the anticipated or hoped positive aspects of 15 this process would be that rumours would be dispelled, 16 questions would be answered, and certain issues would be 17 put to bed. If that could be done, that would be very 18 positive.</p> <p>19 However, I can say, frankly, that the instructions 20 I am receiving from the families that we represent say 21 that that process, they feel, is not taking place. The 22 disclosure process they feel -- rightly or wrongly, 23 Sir -- is not dispelling rumour or suspicion.; it is 24 simply generating more questions and, to be honest, 25 feelings of anger.</p> <p style="text-align: center;">Page 48</p>

<p>1 Of course, the families do not understand the 2 document review process of West Midlands Police or PSNI 3 or other state agencies. It may be that everything that 4 had to be done was done, but when one sits in 5 a consultation room with families of individuals who 6 were taken in the most violent and sudden and extreme 7 way, it is hard to say to them "You just need to trust 8 us on this one, you can rely on these people". They 9 just need a little bit more.</p> <p>10 I would hope that this concern of the families may 11 be addressed, Sir. We spoke on 18 December about 12 practical justice. When we look at the broader scope of 13 an Inquest and what it can achieve, I wonder if this 14 falls within something that we should attempt to do 15 within the proper legal parameters. I say anyone who 16 has practised law has sat down with a client to explain 17 how things work, and the court system and what is 18 achievable and what is realistic; and I have often 19 failed to convince my clients that this was the proper 20 way and that everything was done.</p> <p>21 But I have, in over 20 years of practice, rarely sat 22 with people like I have sat over the last two occasions, 23 and felt the need to persuade them that everything that 24 had to be done, was done. We have looked for these 25 documents on these two issues: forewarning,</p> <p style="text-align: center;">Page 49</p>	<p>1 of documentation that are lost.</p> <p>2 4. Has any documents in this context been 3 destroyed, properly or otherwise? If the answer to that 4 question is yes, identify the documents or classes of 5 documentation that have been destroyed.</p> <p>6 7, in relation to any lost or destroyed document, 7 what steps have been taken to locate the missing 8 documentation?</p> <p>9 8. Please identify those persons who attempted to 10 locate the relevant information with identification of 11 their profession and seniority.</p> <p>12 9. Please identify those persons who were asked to 13 locate documentation or missing documentation.</p> <p>14 10. Over what period of time were efforts taken to 15 locate relevant documentation. And by that I mean lost 16 or missing documentation.</p> <p>17 Finally, in relation to just the PSNI and West 18 Midlands Police: describe specifically the process taken 19 to locate all relevant documentation, including any 20 missing documentation.</p> <p>21 So, those documents that we seek, and this 22 application we make now, the focus is not exclusively 23 but largely on process. It is largely seeking to help 24 everyone understand what has been done.</p> <p>25 I would like to make clear, Sir, at the beginning --</p> <p style="text-align: center;">Page 51</p>
<p>1 agent/informer, because if we can't persuade them of 2 that, this is going to be a very unsatisfactory 3 experience for them.</p> <p>4 I will come back to the specifics of that, Sir, but 5 that is the general context. In light of that context 6 I would like to address you specifically on, if I may 7 say, our two applications.</p> <p>8 The first one is set out at paragraph 33 of our 9 written submissions of 15 January. To summarise Sir, 10 what we are asking for, so there is clarity -- and 11 I feel I should make it clear -- that West Midlands 12 Police, PSNI, MI5, MI6, the Ministry of Defence, 13 separately and individually swear a statement of truth 14 answering the 11 questions set out at paragraph 33, 15 which I will read perhaps if I may very briefly so 16 everybody has a full understanding.</p> <p>17 Question 1. In the context of disclosure and 18 forewarning and agent/informer, what documentation and 19 information in your organisation would you expect to 20 see?</p> <p>21 2. Have you located all documentation that you 22 would have expected to see?</p> <p>23 3. Has any documentation in this context been lost? 24 Which would be understandable given the passage of time. 25 If the answer is yes, identify the documents or classes</p> <p style="text-align: center;">Page 50</p>	<p>1 and this is a point of importance -- we do not besmirch 2 the reputation of those individuals who carried out the 3 evidential searches and we do not besmirch the 4 reputation of those Government employees who have been 5 asked to swear statements on behalf of other individuals 6 and other organisations.</p> <p>7 That is not the case. That is the normal way it is 8 done. So we do not make allegations or criticisms in 9 this respect. Our application is focused on the process 10 and the Interested Persons having clarity on such 11 process.</p> <p>12 In the context of an Article 2 Inquest where 21 13 people have been killed and over 220 people have been 14 injured, we believe it to be incumbent that where there 15 are allegations of cover-up, which is not present in 16 every Article 2 Inquest, where there are allegations of 17 cover-up and perhaps bad faith on the part of specific 18 agencies, that transparency is elevated.</p> <p>19 The ten families, Sir, we represent inevitably 20 represent a range of views on the subject matter of this 21 Inquest and the state agencies involved in 1974 and now. 22 For that reason I make no submission as to the integrity 23 of the agencies or individuals, but as I stated in 24 December when I last appeared in front of you, the 25 submission, the concern, is one that focuses on the</p> <p style="text-align: center;">Page 52</p>

<p>1 operation of the disclosure process, and today and I am 2 following the logical extrapolation of the point I made 3 previously ^. 4 You will recall that previously I addressed you at 5 some length as to the central importance of the proper 6 functioning of the disclosure process, and of course the 7 outcome of that process. In that context, Sir, I would 8 suggest there are two limbs which illustrate the point 9 I'm making today. 10 Number 1, the document or evidence search and 11 identification process. The process that all the state 12 agencies pursued. 13 Number 2, the actual disclosure of evidence and 14 documents to you, Sir, and your team (inaudible) 15 Interested Persons ^. 16 So taking the actual disclosure documents first, if 17 I may: if I could venture to summarise the outcome of 18 the searches for relevant documents on the issues of 19 forewarning and agent/informant. Simply put, the 20 uniform position of the West Midlands Police, PSNI, MI5, 21 MI6 and Ministry of Defence is they have nothing. 22 They have no documentation whatsoever. To my 23 knowledge -- correct me if I'm wrong -- there is not 24 a single piece of paper that has been provided on those 25 two issues. Can one then conclude that there was no</p> <p style="text-align: center;">Page 53</p>	<p>1 that we have a total blank coming out of the state 2 agencies on documentation. 3 Given that outcome, if I may speak frankly, the 4 families that we represent are struggling to believe 5 that the collective state agencies have zero 6 documentation on the three points I have just addressed 7 you on. And now, after several decades of passage of 8 time after the event and what they believe or what they 9 suspect, Sir, to be bad faith on the part of certain 10 state agencies -- and I use my words carefully -- or in 11 action on on the part of certain state agencies, 12 specifically in pursuing the perpetrators of the 13 atrocities, in light of their feelings as to those two 14 issues, they do not trust certain state agencies and 15 that may be regrettable it will, and some would seek to 16 dismiss that, but that is the reality and that is the 17 reality that we take instructions on. 18 The families we represent, Sir, and others do not 19 believe it to be credible that there is not a single 20 sheet of paper, governmental records, addressing the 21 issues that I am addressing you on today. As I have 22 noted rumour and speculation, suspicion, has surrounded 23 the Birmingham pub bombings and has proved to be 24 remarkably resilient over many years. 25 There may be reasons for that, but that is the</p> <p style="text-align: center;">Page 55</p>
<p>1 intelligence before or after the bombings whatsoever? 2 That is a point of some significance, I would venture, 3 particularly in the context the violence beginning in 4 Northern Ireland in 1969 and what the people of England 5 were confronted with in 1973 and 1974. 6 One may also conclude, in light of what these 7 parties have told us, one may conclude rightly or 8 wrongly, Sir, that based on their express position they 9 have no documentation on the perpetrator issue either. 10 Otherwise that would be something that should be 11 provided to your legal team for their, and your, 12 consideration, Sir, given the possibility that this 13 documentation might stray into the issues of forewarning 14 or agent/informant. 15 I may be overreaching here, Sir, but from my 16 understanding of the process -- and my understanding of 17 what the state agents are saying to us -- is they had no 18 intelligence, no evidence, and no documentation on 19 forewarning, agent/informant and perpetrators. That is 20 clearly something that would apply preNovember 1974 but 21 also post. 22 So on those three issues, and I acknowledge that the 23 perpetrator issue is out of scope, but inevitably it 24 will generate the possibility that information or lines 25 of inquiry could lead on to issues in scope, it seems</p> <p style="text-align: center;">Page 54</p>	<p>1 reality and that is, whether it was intended or not, 2 a context or background for what the Inquest has to deal 3 with. 4 If I may say, because it is a point of importance to 5 the families that instruct us, Sir, their views on that 6 point, their views on potential bad faith on the part of 7 state agents or inaction prompted by whatever 8 motivation, whether that be justified or not, it is not 9 motivated by some politically driven agenda ^. this is 10 not motivated by a political goal. The context here is 11 not the politics of Northern Ireland or the 12 constitutional status of Northern Ireland, it is what 13 they believe to be acts of murder that were perpetrated 14 that were never properly dealt with. 15 It sounds trite, Sir, but the families in Birmingham 16 simply seek that the truths behind these atrocities 17 simply be revealed -- which frankly is a challenge -- or 18 alternatively they walk out of here knowing thatting 19 everything that could have been done was done. They are 20 not blind to the challenges -- I will come on to the 21 challenges later of identifying documents -- it is the 22 passage of time. We have many people who have passed 23 away that could have assisted. But it is fair to say it 24 was not their fault that it took 44 years for this to be 25 done.</p> <p style="text-align: center;">Page 56</p>

<p>1 It is also fair to say there are many questions as 2 to the events prior to and post the bombings that remain 3 unanswered. You may feel, Sir, that some of these 4 questions are baseless or lacking in evidential 5 credibility. But there may be reasons for there being 6 no evidence. 7 As I addressed you on the last day, it is the nature 8 of collusion, where it exists, it is the nature of 9 security force collusion where it exists, that it is 10 often hidden or concealed. From the perspective of the 11 families they genuinely believe there would have been 12 some documentation on these issues. They believe that 13 given the responsibilities and scope of the state 14 agencies I have referred to, there would have been 15 something. This not an isolated event. This is it, as 16 it has been stated to be, perhaps the greatest act of 17 mass murder in England in the 20th century outside of 18 war time. It was part of a concerted coordinated 19 bombing campaign. In light of that context, they 20 believe that some very powerful and all-encompassing 21 agencies would have had something recorded, and kept, 22 if only for the purposes of internal organisational 23 knowledge or investigation to dismiss such 24 possibilities. And I see the validity in that position 25 but we have an omission and I think this omission has</p> <p style="text-align: center;">Page 57</p>	<p>1 the conclusions that we reach, or the conclusions that 2 we are only able to reach, are seen as being entirely 3 proper and legitimate. 4 This is a requirement for the Inquest under the 5 terms of conducting an effective Article 2 Inquest but 6 as I have mentioned on the last occasion it may assist 7 in some small way some agencies who in certain quarters 8 have suffered a reputational deficit in the context of 9 the Birmingham pub bombings. 10 It may also avoid an inquest conclusion being 11 subject to a qualification in the minds of the families 12 or general members of the public. If we have done 13 everything we can to instill confidence in the search 14 for evidence, then this will transmit through the 15 Inquest process. If there is not evidence in the search 16 for evidence then there will be a lack of confidence in 17 the whole process. That means that the families we 18 represent will walk away dissatisfied and cannot in this 19 sense put the matter to rest. The questions that they 20 feel currently, and in some cases it have been troubling 21 them for many years, can be put to bed. 22 Hopefully, this will leave the families feeling that 23 after a wait of 44 years the full left investigation 24 possible was taken, and every single step -- every 25 single step -- was taken to pursue the truth of events</p> <p style="text-align: center;">Page 59</p>
<p>1 significance procedurally ^. 2 The search for documentary evidence on these issues 3 has produced a blank -- if I may put it that way without 4 trivialising it -- but if the search, Sir, had yielded 5 something in the way that other Inquests or other, if 6 I may call it, legacy litigation has revealed, then the 7 families might well have been persuaded that the search 8 process was an effective one and everything was done 9 that had to be done. 10 However, that has not happened. We don't have 11 anything and therefore I believe we should consider the 12 consequences of that to see if we can, at this juncture, 13 do anything about that which would have a positive 14 purpose. 15 I would respectfully submit that because the search 16 across Government and the security agencies has yielded 17 no relevant documentation, they say, on the central 18 issue, then it becomes more important to look at the 19 process that led to that outcome. 20 In doing so, Sir, we may in a transparent, forensic 21 and appropriate way reveal what has been done and what 22 has not been done, what exists or doesn't exist, what 23 records one might have expected to have seen, so that by 24 doing so the integrity of the process and therefore the 25 integrity of the Inquest can be protected and therefore</p> <p style="text-align: center;">Page 58</p>	<p>1 prior to, during and after the 21 November 1974. 2 The full investigation is what is the paramount 3 consideration for the families that we represent? Some 4 of them, Sir, still harbour hopes that those 5 responsibility for the killings will be criminally 6 prosecuted. That respect remains unclear and is beyond 7 the immediate power of this Inquest, rather it lies 8 within the responsibilities of the police. However, 9 Sir, what is within your power is that after the 10 families have endured the longest wait that a forensic 11 and complete investigation is conducted. And that 12 process starts with the evidence and what is done to 13 locate evidence and what is actually disclosed. 14 That is why, at this point where we are informed now 15 that the disclosure process is largely finished -- and 16 I am sure it was not done in one effort, it was done 17 over an extended period of time -- that process is 18 largely finished and next month we begin the Inquest, 19 I believe it is reasonable and necessary that some steps 20 now be taken to check the processes that have been done. 21 We know that process was difficult. In fact, it is 22 beyond difficult. It is an administrative challenge of 23 the highest order for a number of good reasons: the 24 passage of time, the fact that the events took place 25 prior to the widespread use of computerisation of</p> <p style="text-align: center;">Page 60</p>

1 records, the subsequent submission of paper records to
 2 computerisation and databases may not have been complete
 3 ^. And also, of course, Sir, that some of the
 4 organisations involved, namely the security service, MI5
 5 and the secret intelligence service MI6 and the Ministry
 6 of Defence by necessity have to operate with high
 7 degrees of secrecy, and the reality is that in those
 8 organisations one department may not wish to or may not
 9 be able to share information with other departments
 10 internally. That makes the task of locating
 11 documentation extremely difficult. That's why the
 12 process is so important.

13 So, on the last occasion one person who is here
 14 representing one of the deceased said to me in a room
 15 outside "How do we know they have done it properly?"
 16 I have also received more frank comments from some of
 17 our clients, because they are disfrustrateful and they
 18 are angry. They feel that certain agencies have not
 19 done at all they could have.

20 I don't mean to be trite or dramatic in saying that,
 21 but I feel that the families' feelings as to this
 22 specific point of this Inquest and this process should
 23 be known. There is a danger, Sir, that the
 24 professionals' feelings on this are disconnected from
 25 those of the families. Inevitably that will happen to

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1 a degree, but what I seek, Sir, through my paragraph 33
 2 application is that we address that practically.

3 The reason why I have gone into some detail as to
 4 what the families are telling me is because I know --
 5 and I know your legal team and others involved in
 6 process will want to address concerns they have -- your
 7 legal team has conducted, I would imagine, thousands of
 8 hours working on this, and they know, or they may feel,
 9 that they have done what they could. But they are
 10 reliant upon what other people are telling them, and
 11 that is what we have focused on.

12 So I do not believe that anything we are asking for
 13 should be properly kept secret. In certain cases it may
 14 be, for example, where we ask for the identification of
 15 individuals in certain instances that cannot be provided
 16 and that's something you can rule on. But you, Sir, and
 17 your legal team can satisfy yourselves that the
 18 individuals providing reassurance are sufficiently
 19 senior to be able to say everything that should have
 20 been done has been done.

21 But what we seek is that someone senior stands over
 22 what has been done. Rather than that someone,
 23 a professional who is legally obliged to take
 24 instructions, has set out what they believe the position
 25 to be based on what others have communicated to them.

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1 In doing so, we address the families to say "You
 2 have raised an issue which has been dealt with, and
 3 actually now we have looked at this, I can see that
 4 someone senior has taken personal responsibility for
 5 what has been done".

6 That will transmit to them and others, I hope, in
 7 the wider public, the confidence that they should have
 8 in this process. Because if I may be frank, what we
 9 want to avoid, Sir, is that we go through this process
 10 and question marks remain and we have the families
 11 outside this building on the conclusion of the Inquest
 12 giving interviews saying "I don't think we have seen all
 13 the evidence." and talking about cover-up.

14 We want to put that to bed. We want to conclude
 15 that there was nothing that could have been done to have
 16 prevented this atrocity. So the point is identifying
 17 all the documentation is very difficult, so if we have
 18 some clarity on the process it might be we can
 19 contribute to that in probably a very defined way in
 20 saying "well, have you looked for X and Y?" and the
 21 answer may be "yes, we have and it doesn't exist". Of
 22 course that is concluded in what we did, it is part of
 23 the two-way street where we can hope to understand,
 24 review, and perhaps -- or perhaps not -- contribute to
 25 that process.

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1 If I may, Sir, I would like to make reference to
 2 another case that I believe may have some relevance in
 3 this context. That is the litigation in
 4 Northern Ireland -- and perhaps elsewhere -- relating to
 5 the alleged army agents in the IRA, the so-called Agent
 6 Stakeknife. I know personally that in that series of
 7 litigation notwithstanding that it has been pursued over
 8 many years, there are still documents being disclosed.
 9 Many years ago we had the agencies searching for and
 10 identifying documents, but even now new documents of
 11 relevance in the context of Troubles era, Troubles
 12 related, atrocities, and on the issues of agents and
 13 informers who have been engaging with the security
 14 forces, new disclosure is coming out --

15 THE CORONER: I don't want to interrupt you. I just want to
 16 ask the staff if they are albeit all right.

17 MR MORGAN: So in that context, notwithstanding this
 18 forensic huge effort to find evidence in the Stakeknife
 19 related cases we still have discovery coming out and in
 20 fact we have significant, I am told, new documentation
 21 provided in November and December of last year.

22 That experience may inform this experience here,
 23 because it shows how difficult it is to get the
 24 documentation. It shows the challenges of obtaining all
 25 the evidence when you deal with murders and paramilitary

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<p>1 organisations and others conducting atrocities like the 2 nature we see here, where there is some involvement of 3 the security forces. 4 So, Sir, the point I seek to make is that there 5 needs to be a focus on what has been done. There needs 6 to be transparency in the process. If needs be, that we 7 can contribute to that process so the investigation is 8 not prejudiced by incomplete evidence being presented to 9 you, Sir, or the jury on the first day of the Inquest. 10 The statements ^ may allow the families and everyone 11 else to form a view that everything that could be done 12 was done. That is no easy task, but this, I believe, is 13 unavoidable if we are to have an effective Article 2 14 Inquest.. In this respect it will assist everyone if 15 the families can actually see that to be the case. 16 We have over 22,000 -- 17 THE CORONER: I think I understand your application. 18 MR MORGAN: One other point in that context I would like to 19 address you on is that this process may assist -- these 20 11 questions -- may assist in identifying lost or 21 destroyed documentation. 22 This is important, Sir, because if one is to 23 determine scope or potentially draw conclusions as to 24 a thesis or point on which there is no documentary 25 evidence, it would be helpful to know if some of the</p> <p style="text-align: center;">Page 65</p>	<p>1 anything further to be done. But there were points that 2 had to be examined, we would ask for the ability to do 3 that, perhaps in the first place in writing and then if 4 necessary before you, Sir ^ in the first instance. 5 I would say, Sir, that the order we seek today is 6 within the gift of this Inquest to make. It would help 7 expedite the process and move this on, given that we are 8 going to begin on 25 February. I acknowledge that the 9 legal representatives for Her Majesty's Government, the 10 Ministry of Defence, MI5 and MI6 are not here today. It 11 is disappointing they are not here but they have 12 explained why they could not be here. If they feel that 13 they wish to address this, then perhaps they could 14 submit submissions on that point. We have no objection 15 to that. But we feel that in the first instance, Sir, 16 that you can make the orders we seek in that context. 17 That is the conclusion of that point. I have 18 a second point which I will address you quickly on if 19 I may, unless you have any questions? 20 The second point is the protocol and policies and 21 this is set out in the letter of KRW Law on the 15th -- 22 THE CORONER: And you is said quite a bit this morning so 23 I have the points. 24 MR MORGAN: You have the point. In general this is the 25 protocol and policy on dealing with acts of terrorism,</p> <p style="text-align: center;">Page 67</p>
<p>1 documentation is no longer available. 2 Mr Skelton has said properly earlier today that it 3 is unrealistic that all the information from 1974 would 4 be retained. He's entirely right to say that. But in 5 drawing conclusions as to scope or conclusions as to 6 more substantive matters, if we are going to draw 7 inferences from a lack of documentary evidence, you , 8 Sir, and the jury, should understand if there 9 is information or evidence that is missing. On the last 10 occasion I referred to the missing joint intelligence 11 committee folders, the cabinet papers, from 12 October/November/December 1974. That is one example. 13 There may be other documents that has been properly 14 disposed of ^. 15 We would like to know that if one is to draw 16 inferences from the absence of evidence. 17 And I would say practically, Sir, given the work has 18 been done at some detail, length and expense, it is 19 hoped that the process of drafting a statement which 20 could be relatively short would not introduce any delay 21 whatsoever to this process and would be reasonable and 22 proportionate. 23 Once that is done, I would ask, Sir, that provision 24 is made if necessary to deal with the answers. It may 25 be the answers we get do not prompt the need for</p> <p style="text-align: center;">Page 66</p>	<p>1 bombs, attempted bombings and for the security fores and 2 the emergency services to deal with that appropriately. 3 ^. 4 We do not believe it to be credible that there were 5 no protocols or policies on dealing with the IRA bombing 6 campaign and bombs in general at the appropriate time -- 7 THE CORONER: What is your application? 8 MR MORGAN: The application is that we are provided with, 9 one, that there is a further request made it as to the 10 specific documents set out at A to G in our letter of 15 11 January. 12 Once that has been dealt with, if the answer is that 13 MI5, MI6, police, emergency services, had no policies or 14 protocols on dealing with the ongoing IRA bombing 15 campaign in 1974, that they would simply say so. 16 I will be cautious in saying this, but my 17 understanding is that we have looked, efforts have been 18 made to identify these things, but the third parties 19 have not been able to provide anything or their position 20 is somewhat equivocal in saying there may have been but 21 we can't remember. 22 THE CORONER: Have you found any? From your searches? 23 MR MORGAN: I see reference to one document which is 24 a police college document which is perhaps -- 25 THE CORONER: Yes.</p> <p style="text-align: center;">Page 68</p>

<p>1 MR MORGAN: -- a few pages long long. 2 THE CORONER: There is one in the ^ archives at Hull and 3 one from the College of Policing. 4 MR MORGAN: I'm not sure that that appears to me to be 5 operational. I don't know to what extent the West 6 Midlands Police would rely on that or seek it out. What 7 we will be raising in due course is, well, what was the 8 protocol in dealing with it. In the period 1973 to 9 1974, we had over 50 bombs. What was the procedure that 10 was recommended so that police officers and others on 11 the ground can deal appropriately with bomb warnings, 12 planting of bombs, searching of bombs, detonation of 13 bombs, how to deal with bombs when they have not gone 14 off? 15 THE CORONER: I think I have your application. 16 MR MORGAN: Thank you. 17 Because clearly the point is if there were no 18 protocols and procedures, that's a point of 19 significance. If there were, were they followed? And 20 if there were, were they fit for purpose. 21 THE CORONER: You said all that this morning. 22 MR MORGAN: Unless you have any questions, Sir. 23 THE CORONER: I have that from this morning. 24 So in effect, what to do if there was a bomb which 25 detonated, what to do if there was a bomb which did not</p> <p style="text-align: center;">Page 69</p>	<p>1 Ms Patrick? 2 Submissions on behalf of Sean Reilly and Brian Davis by 3 MS PATRICK 4 MS PATRICK: Sir, I hope, looking at the clock, that I can 5 be exceptionally brief. 6 THE CORONER: That is kind of you. 7 MS PATRICK: The first point is to pass on the apologies of 8 Ms Williams. 9 THE CORONER: Yes, thank you. 10 MS PATRICK: When the date for today was set, it was 11 clashing with a date where she was sitting as a Recorder 12 and she has asked me to pass on her apologies for being 13 unable to be here today. 14 Secondly, to add to everybody else's thanks for the 15 obviously extensive work that CTL, your legal team, have 16 done in preparation for today. We have had a very 17 constructive and collaborative conversation on the 18 logistics and the practical steps to the start date to 19 the Inquest. 20 I have two points -- I am not going to add much to 21 the submissions of Mr Morgan -- but two points arising 22 from the applications of KRW. It would be inappropriate 23 for me to repeat the already very lengthy submissions 24 made by our team on behalf of the families we represent, 25 not only on the significance of this matter but on</p> <p style="text-align: center;">Page 71</p>
<p>1 detonate? What was the response and protocol or policy, 2 if any? 3 MR MORGAN: Yes. What is your policy on evacuation of 4 buildings ^ crk. What is the list of priorities for 5 when you are confronted with an extremely short bomb 6 warning. 7 THE CORONER: Okay. 8 MR MORGAN: What is the policy when a member of the press 9 calls the police to say "I have received a coded 10 warning"? 11 Also you will see, Sir, that we seek information on 12 intra police communication crg credit. A central point 13 here, I'm conscious of the time, is what were West 14 Midlands Police doing in terms of communicating with RUC 15 to get their assistance on IRA tactics, methodologies, 16 personnel ^. That is clearly within forewarning. 17 We know that there were protocols in place between 18 police in England and Northern Ireland and thed Garda 19 shik shik. So I am sure I would expect that senior 20 police officers of the West Midlands Police were 21 contacting their RUC counterparts to seek their 22 assistance and we could like to understand how that was 23 dealt with. 24 THE CORONER: Yes. 25 MR MORGAN: Thank you.</p> <p style="text-align: center;">Page 70</p>	<p>1 issues of disclosure which have been addressed in our 2 earlier written submissions and by Ms Williams at the 3 PIR in May 2017 and again in December 2018. 4 There are two points that may assist you in your 5 decision. In our written submissions in December 2018, 6 at paragraph 51, we dealt with the issue of whether or 7 not there should be, or there is a potential for, 8 further disclosure statements to be made by agencies and 9 others. We don't add anything further to that. 10 Again, a matter of which you are already aware, we 11 are conscious of the significance of the efforts being 12 made by your team to garner policies, practices and 13 procedures relevant to the incidents on the day, and we 14 have raised questions, specifically in those 15 December 2018 submissions at paragraphs 111 to 113, on 16 policies, practices and procedures relevant to the 17 policing of the day, and asked an outstanding question 18 around if there are no policing witnesses, in the 19 absence of Professor Jarrett, how does the Inquest 20 propose to deal with the questions of policies, 21 practices and procedures? 22 That would cover some of the issues raised by my 23 learned friend in respect of, do we know if there were 24 no policies, or simply do we no longer have a record of 25 them? I welcome the submission of Mr Skelton this</p> <p style="text-align: center;">Page 72</p>

<p>1 morning in recognition that there may have to be some 2 thought given to how that point would be addressed. 3 Other than referring you to those earlier 4 submissions of ours, I have one final point that is no 5 more than a marker that there is something that we have 6 raised with your legal team -- and they think that we 7 may be able to deal with it without troubling you -- and 8 that is the question of Michael Reilly and the Young 9 Planter, and the issue of anonymity and the reasons for 10 it given by Granada TV, which we understand were for 11 security reasons. 12 In previous submissions of December 2018, which 13 I don't repeat, at 78 to 80, we raised the question of 14 asking for any information on those reasons to be given 15 so that we might explore whether or not those reasons 16 were relevant to any question about whether the Young 17 Planter, whether that be Michael Reilly or not, was 18 being protected from being revealed for reasons that 19 might indicate that there was some agency or informer 20 role being played by him or not. 21 But that is simply an open question at this stage, 22 and I'm grateful to your legal team for indicating that 23 we may have conversations outside court which might be 24 able to address that issue before troubling you any 25 further.</p> <p style="text-align: center;">Page 73</p>	<p>1 discerned. 2 In other words, Sir, there is a potentially thorny 3 legal issue -- in addition to which there are the issues 4 that I raised this morning and which I don't intend to 5 repeat -- which is, Sir, that your counsel have assured 6 the court that they have received the full cooperation 7 of West Midlands Police. In those circumstances, it 8 would be a marked departure from the norm to require 9 evidence as to -- well, as to what we are referring to 10 as disclosure, but I think strictly speaking disclosure 11 would be the passing of information from you, Sir, to 12 the interested parties. What has happened heretofore is 13 a voluntary provision of information to you in order to 14 conduct your investigations. I'm not sure disclosure is 15 quite the right word. 16 But in any event, the next point is that it seems to 17 be said by my learned friend that there was some basis 18 under Article 2 on which a statement such as he was 19 asking for would fall to be necessary. 20 In my respectful submission, that argument is 21 without authority, and does not give rise to a tenable 22 argument in circumstances in which the process up until 23 now has not occurred in a vacuum. 24 Sir, where I am perhaps going with these 25 observations, is that the Chief Constable can well</p> <p style="text-align: center;">Page 75</p>
<p>1 Thank you. 2 THE CORONER: Thank you very much. 3 Submissions on behalf of West Midlands Police by MR COHEN 4 MR COHEN: Sir, yes. I'm in something of a quandary because 5 I see the time. 6 THE CORONER: Yes. 7 MR COHEN: Some extensive submissions have been made which 8 do sound directly against West Midlands Police, but also 9 against central Government organisations which of course 10 I hold no brief for. 11 Really, Sir -- 12 THE CORONER: I think I'm going to have to have their 13 observations. 14 MR COHEN: Sir, yes. The totality of what I say, perhaps, 15 at this juncture is my learned friend Mr Morgan has not 16 actually isolated the basis of the power which he says 17 you would enjoy to order statements of this type. 18 One presumes it would be a power under Schedule 5, 19 but query -- and I don't seek to make definitive 20 submissions on it now -- whether that would be an 21 applicable provision in circumstances in which what is 22 being sought is not really a statement about the facts 23 within the scope of your inquiry, Sir, but, if I can put 24 it like this, a meta-analysis of how the facts which 25 have been drawn to the court's attention have been</p> <p style="text-align: center;">Page 74</p>	<p>1 understand the desire of the families to have as full 2 a picture as possible. There are legal difficulties 3 with the statement that my learned friend has asked for, 4 or at least potential legal difficulties; there are also 5 potential practical difficulties with the width of the 6 questions that are set out at paragraph 33 of the 7 submissions. 8 What I therefore seek at this juncture is a pause 9 for breath to allow West Midlands Police to reflect on 10 the obvious strength of feeling which exists, and to see 11 if more could be done to assuage concerns. 12 That would mean, Sir, that you didn't make an order, 13 under whatever power is said to exist, at this juncture, 14 but that -- 15 THE CORONER: I don't think I can make an order without, in 16 fairness, allowing Her Majesty's Government to respond. 17 MR COHEN: Sir, yes. What I was going to say is that the 18 collateral benefit of the pause that I am advocating for 19 is that it would also give you the opportunity to 20 receive submissions from Her Majesty's Government, if 21 I can use that catch-all phrase, on their position on 22 this application. 23 So, Sir, what I ask for, in short, is a pause to 24 allow West Midlands Police to review what might be 25 a practical way forward, to give you an opportunity to</p> <p style="text-align: center;">Page 76</p>

<p>1 hear from the Government, and, broadly speaking, to 2 allow this application, which might be far-reaching, to 3 come before you on a slightly more even keel. 4 Sir, in relation to policies and procedures, 5 I simply pause to say this. West Midlands Police wish 6 that they had been able to track down policies and 7 procedures that would have been able to assist you in 8 this inquiry. They have not been able to. That is not 9 for want of trying. 10 I'm not suggesting that those policies and 11 procedures, if they existed, would be irrelevant. I'm 12 not suggesting that they would not fall to be disclosed 13 on some basis. The answer from the Police's perspective 14 is rather more simple, which is that unfortunately, 15 despite significant efforts -- including consulting the 16 force's own museum and making a number of attempts to 17 track down anything that would fall within this 18 category -- they have not been able to do so. 19 Sir, I think that is all I can usefully say at this 20 time. 21 THE CORONER: Yes, thank you. 22 Submissions by COUNSEL TO THE INQUEST 23 MR SKELTON: Sir, finally, a few observations from me. 24 Hopefully brief ones. 25 So far as disclosure is concerned, I will repeat</p> <p style="text-align: center;">Page 77</p>	<p>1 for reasons that I previously explained. 2 Those documents, of course, are primarily -- 3 THE CORONER: Documents about perpetrators have not been 4 withheld, is that right, under the process which we 5 have? 6 MR SKELTON: As a matter of generality, they have not been 7 withheld. 8 There may, of course, be documents that are still 9 within the West Midlands Police archive, or indeed other 10 archives, which may bear upon the perpetrator issue that 11 have not been disclosed, but for the most part we have 12 disclosed a huge amount of documentation which is 13 relevant to those sorts of issues, notwithstanding that 14 that is not within the scope. It has not been 15 comprehensive because it did not need to be 16 comprehensive. 17 The simple point I'm making, so far as disclosure is 18 concerned, is that having provided all that 19 documentation, there is nothing within it that bears 20 upon agent/informant which is relevant. 21 So far as disclosure statements are concerned, you 22 will recall, Sir, that we wrote to Her Majesty's 23 Government on 30 and 31 October last year, requesting 24 that they provide statements from the individual 25 departments and agencies that may hold relevant</p> <p style="text-align: center;">Page 79</p>
<p>1 what I said at the last Pre-Inquest Review. We have 2 received full cooperation from all document stakeholders 3 on the issue of disclosure. We have made very extensive 4 inquiries and have sought assistance from a huge number 5 of people and organisations in seeking out relevant 6 information -- 7 THE CORONER: It has not just been a question of saying 8 "Have you got anything?" and their saying "No"? 9 MR SKELTON: No, it has been much more active than that. 10 THE CORONER: Considerably more active than that. 11 MR SKELTON: We have been to the locations. And, as I said 12 last time, it has also been an iterative process: we 13 have received results; we have expanded searches; we 14 have gone to the locations and we have had extensive 15 discussions with lawyers and policy people. 16 The result has been that we have not found any 17 relevant information about the agent/informant issue and 18 hence the ruling that you made right at the end of last 19 year. 20 I must, however, clarify that there is a vast amount 21 of documentation, of course, about the bombings 22 themselves and about the potential perpetrators of those 23 bombings. That issue of perpetration, of course, is not 24 within the scope of these Inquests, but disclosure has 25 been given of documents that may bear upon that issue</p> <p style="text-align: center;">Page 78</p>	<p>1 documents. 2 They firmly, but politely, declined to provide those 3 statements, and instead provided a single statement from 4 a Government lawyer, a Government Legal Department 5 lawyer, which it is fair to say is thorough and deals 6 with the entirety of the efforts made by the individual 7 agencies to comply with the disclosure requests that 8 were made of them. 9 That is a standard statement, analogous to the one 10 that one might see in High Court proceedings that 11 Mr Morgan mentioned before, produced by a lawyer and the 12 lawyer herself being in charge of the procedure of 13 disclosure. So in other words, she is responsible for 14 marshalling the efforts that are made and is responsible 15 for explaining those to the court in due course. 16 We have no criticism ourselves of that statement, 17 but I would like to emphasise that we had previously 18 requested something more than that. 19 At the last PIR, having received Ms Oakley's 20 statement, we didn't, on your behalf, make any proposal 21 that we needed more from Ms Oakley, or indeed from any 22 of the individual departments or agencies. 23 We have, however, listened very carefully to the 24 submissions made strongly and at some length by 25 Mr Morgan this afternoon. I don't propose to make any</p> <p style="text-align: center;">Page 80</p>

<p>1 substantial submissions in response to that, but I do 2 endorse the suggestion which you, yourself, have made, 3 and indeed Mr Morgan and latterly Mr Cohen, that the 4 Government themselves, not being present today through 5 no fault of their own, should have the opportunity to 6 make submissions to you, I would suggest in writing, on 7 this issue, having availed themselves of an opportunity 8 to look at the transcript, which will be available 9 probably tomorrow, and will give them a chance to think 10 about the requests made and how they would like to 11 respond. 12 Mr Cohen is right to caution that the exercise of 13 legal powers in these circumstances needs to be 14 considered carefully. You do have statutory powers to 15 request statements from people and organisations where 16 it is reasonable to do so, but whether that threshold 17 has been met may not be as straightforward as Mr Morgan 18 may think. Certainly the Government, as I anticipate, 19 will have a view as to the proportionality and 20 reasonableness of such a request, bearing in mind 21 Ms Oakley's statement and bearing in mind the overall 22 endorsement of the disclosure process by your legal 23 team. 24 THE CORONER: Coroners do from time to time issue Schedule 5 25 notices requesting evidence.</p> <p style="text-align: center;">Page 81</p>	<p>1 those sorts of issues -- 2 THE CORONER: Why did they act in a particular way? 3 MR SKELTON: Were you trained to respond to these 4 situations? Were there any policies so far as you were 5 aware? If there were, did you comply with them or did 6 you not comply with them? 7 THE CORONER: Yes: you were an inspector at the time, or of 8 relatively senior rank, what did you act upon? 9 MR SKELTON: So it is the people on the ground who may be 10 able to answer the questions that we can't answer 11 through the documentary trail. 12 THE CORONER: Yes. 13 MR SKELTON: If they can't answer it, well, so be it. It is 14 understandable at this remove, but we will try. 15 So our proposal is not to renew requests or remake 16 or make new requests in respect of policies, but rather 17 to direct our attentions to the witness evidence in that 18 regard. 19 Those, Sir, are my submissions. 20 THE CORONER: Yes, thank you. 21 I will request, through counsel on my behalf, for 22 these two applications, particularly the first, to be 23 put before Her Majesty's Government's lawyers to 24 consider this, to see if they have anything they wish to 25 say about this, and to do so in writing and to do so</p> <p style="text-align: center;">Page 83</p>
<p>1 MR SKELTON: They do. 2 THE CORONER: But some of them have rather quickly -- or 3 indeed rather slowly -- ended up in the High Court. 4 MR SKELTON: Yes. It would be an unfortunate position if, 5 having issued a notice, it was resisted by the 6 Government and challenged in the High Court, with 7 satellite proceedings in parallel to the Inquest 8 proceeding. That would be most unfortunate. 9 Likewise, in respect of Article 2, I must endorse 10 Mr~Cohen's point that I'm not aware of any specific 11 Article 2 jurisprudence on this particular point. I 12 would like to consider carefully what the Government 13 have to say on that matter and, if necessary, will make 14 further submissions on that point. 15 In any event, Sir -- 16 THE CORONER: Yes. 17 MR SKELTON: -- in due course you will need to make 18 a decision having heard from all the relevant people. 19 THE CORONER: Yes, I will. 20 MR SKELTON: So far as the second point that Mr Morgan 21 pressed in his application -- the policies -- I'm not 22 going to repeat what I said this morning. 23 We have made extensive requests. We have not found 24 anything. Our intention is to explore, insofar as we 25 can, with the witnesses who give evidence at the Inquest</p> <p style="text-align: center;">Page 82</p>	<p>1 quickly, which is not always easy with Her Majesty's 2 Government. 3 So today is the 17th. Perhaps we should work back. 4 The Inquests commence on 25 February. It might be 5 sensible at this time to pencil in a further Pre-Inquest 6 Review hearing on 11 February, which was originally our 7 date for the start of the Inquests. I think we had some 8 discussion but never came to a final view as to whether 9 that date should be kept, but that would be a good time 10 for anonymity applications. So the press can be 11 notified now -- national and local media -- of that 12 hearing, and if they are interested then they can apply 13 and make representations if they want. 14 At the moment there is not immediately disclosure 15 available as part of those applications because the 16 applications have not quite been made, but that will be 17 done. That is an ongoing process which is immediate and 18 urgent. 19 So if we put in 11 February to be vacated if it is 20 not necessary then, working back, I think, Mr Morgan, 21 you want to have until 1 February for any observations 22 about my draft opening and until 25 January for any 23 observations on the report of Mr Mole or the 24 chronologies which are in a draft form for your views. 25 So I think those are your dates. I am agreeing to</p> <p style="text-align: center;">Page 84</p>

<p>1 those unless anybody else has any view. 2 So, where does three weeks take us to? 3 MR SKELTON: Friday 8th or Thursday 7th. 4 THE CORONER: I see no reason why they can't respond in 14 5 days, at least in the first instance, in writing. 6 If they want a little more time, I will give them 7 a little more time, but I would hope for a decent 8 response from them within 14 days, so that everybody 9 else can have a look and respond if necessary in 10 writing. 11 So we have anonymity; we have the two applications 12 by Mr Morgan. Anything else which should go on that 13 list? Not at the moment? 14 MR SKELTON: No. 15 THE CORONER: I am sure something will arise. Yes, anything 16 else? 17 Thank you all very much. I'm particularly grateful 18 to the shorthand writer and the staff for sitting late. 19 Thank you. 20 (5.26 pm) 21 (The Inquest adjourned until 10.00 am 22 Monday, 11 February 2019) 23 24 Opening remarks by COUNSEL TO THE1 25 INQUEST Update on the Progress of the4</p> <p style="text-align: center;">Page 85</p>	
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