

1 Thursday, 17 June 2021
 2 (9.30 am)
 3 THE CHAIRMAN: Yes, Ms Blackwell.
 4 MS BLACKWELL: Good morning, sir, we are going to begin
 5 today's business with an application made on behalf of
 6 Nathan Mason for core participant status.
 7 THE CHAIRMAN: Yes.
 8 MS BLACKWELL: I am going to ask Ms Sikand, Queen's Counsel,
 9 who appears on behalf of Nathan Mason, to make her
 10 application now.
 11 Sir, you should have written submissions served on
 12 behalf of Nathan Mason, together with a letter which
 13 precedes those submissions dated 2 June of this year
 14 from Markel Solicitors.
 15 THE CHAIRMAN: Yes.
 16 MS BLACKWELL: Thank you.
 17 THE CHAIRMAN: Yes.
 18 Yes, Ms Sikand, thank you for joining us and thank
 19 you for rendering your assistance.
 20 MS SIKAND: Thank you for hearing from me, sir.
 21 THE CHAIRMAN: Not at all.
 22 Application by MS SIKAND
 23 MS SIKAND: Sir, I should begin by saying that the
 24 combination of your provisional ruling, CTI's note of
 25 yesterday, for which I am grateful, and the written

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1 inevitably hampered, I can only do what I can do in the
 2 very short space of time I have had to try and get on
 3 top of the limited material that I have.
 4 All of you, sir, will obviously be ahead of me as
 5 far as the facts and history of this inquiry are
 6 concerned.
 7 THE CHAIRMAN: I can assure you that you have all the
 8 material that you need. It is not one of those cases
 9 where there is material which you haven't seen which
 10 will inform me in deciding this application.
 11 MS SIKAND: Sir, there is one aspect of that I don't agree
 12 with, but if I begin and then I will tell you why it is
 13 that I don't --
 14 THE CHAIRMAN: I shall go quiet.
 15 MS SIKAND: Thank you, sir.
 16 Sir, I want to say something at the outset about the
 17 timing of this application, because the Metropolitan
 18 Police submissions make the specific point that it is
 19 not understood why Mr Mason has waited until shortly
 20 before the inquiry has begun, to use their words, to
 21 request core participant status. It goes on to say in
 22 those submissions it is assumed that he knew that he
 23 would be a witness a long time ago and under the
 24 protocol core participant applications should have been
 25 made by 27 March 2020.

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1 submission from the two core participants objecting to
 2 the designation of my client as a CP leaves me under no
 3 illusion that my struggle to persuade you of the
 4 propriety now of making him a core participant is
 5 something of an uphill struggle.
 6 THE CHAIRMAN: No mountain is insurmountable.
 7 MS SIKAND: Sir, I was hoping you would say that, because
 8 importantly we note --
 9 THE CHAIRMAN: It took a long time to get to the top of
 10 Everest, but it was eventually achieved.
 11 MS SIKAND: Yes, of course some died trying to do that, sir,
 12 but I hope that is not where I will end up.
 13 We note, sir, importantly that the family do not
 14 object to Mr Mason being designated a core participant,
 15 but I note that in Sir John Saunders's ruling, which ...
 16 helpfully provided a link to it by your counsel --
 17 THE CHAIRMAN: We knew you were brought in at the last
 18 minute, no criticism attaches to anyone for that, but we
 19 wanted to make sure that you had everything at your
 20 disposal to enable you to make such submissions as you
 21 thought appropriate by way of supplementing, associating
 22 yourself with or disassociating yourself from any of the
 23 submissions that had already been made in support of the
 24 application.
 25 MS SIKAND: Sir, yes. Obviously, the timing means that I am

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1 Sir, the real question we would submit is why he,
 2 a person so inextricably bound up with the events of
 3 13 December 2015 and who could potentially provide
 4 a counterfactual narrative to that of key police
 5 officers was only in fact approached by the inquiry for
 6 the first time on 13 May 2021 in relation to being
 7 a potential witness.
 8 Any assumption the Metropolitan Police make in those
 9 submissions is misplaced. His whereabouts, sir, were no
 10 mystery given his incarceration.
 11 THE CHAIRMAN: Yes.
 12 MS SIKAND: For the best part of six years, everybody knew
 13 exactly where he was but certainly he had no idea that
 14 he may be required as a witness. Indeed, it appears
 15 that maybe the inquiry did not either, given the
 16 lateness of that approach or maybe, sir, there is
 17 a different explanation for that.
 18 So it is difficult to understand why the MPS make
 19 the assumption they have.
 20 I make the point, sir, how would he, a prisoner,
 21 have known about the inquiry's protocol for core
 22 participants and its deadlines? He in fact had some
 23 contact with the IPCC, as it then was, when he was first
 24 incarcerated, but since then he hasn't had any contact
 25 with any state body telling him about what is going on

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<p>1 on the ground or what the plans were for the inquest or 2 its development into a public inquiry, and why would he? 3 Sir, with respect, had the inquiry approached him 4 earlier, he would have obviously been aware of the 5 circumstances of this inquiry and be able to access 6 legal advice, as he did the moment he was able to and 7 make the application that he has now made. 8 So I wanted to set that out at the outset because in 9 my submission it is utterly unfair to suggest that he 10 could have done this earlier. 11 The delay, we say, is perfectly explicable. That is 12 of course, sir, why in fact the rules allow you to 13 designate at any time as a sort of recognition that not 14 all core participants will know that there is a public 15 inquiry going on, that is why the rules are drafted in 16 the way that they are. 17 Sir, there is no dispute between those who have 18 provided submissions as to the legal framework, and 19 I most certainly do not intend to go back over the 20 basics, but just in summary to say we all know that 21 there is no statutory definition of a core participant, 22 it is uncontroversial to say that the principal effect 23 of designation, in very basic terms, is to bestow on the 24 core participants the right to disclosure, to make 25 an opening and closing statement, and, if legally</p> <p style="text-align: center;">Page 5</p>	<p>1 represented, to seek leave under rule 12 to ask 2 questions of a witness or indeed to suggest lines of 3 inquiry to CTI and to make legal submissions. 4 Sir, as the late Sir Christopher Pitchford said in 5 the context of the Undercover Policing Inquiry, the 6 purpose of designation is to provide the most intimately 7 concerned with the work of the inquiry with the means to 8 participate effectively. Sir, as you have set out in 9 your provisional ruling, under rule 5 of the inquiry 10 rules, the chairman has discretion whether to designate 11 a person, with their consent, as a core participant, but 12 of course before doing so, sir, by rule 5(2), you must 13 consider the rule 5(2) criteria, but as 14 Sir John Saunders has said in the ruling that has been 15 referred to by CTI, and echoed by CTI I see in their 16 written submission, these are neither a condition 17 precedent to the grant of core participant status and 18 nor are they decisive. 19 In short, sir, you have a very wide discretion and 20 of course you have to approach this with the overarching 21 lens of fairness, as is your statutory duty under the 22 Act. 23 Sir, you have provisionally determined that Mr Mason 24 does not have a significant interest in an important 25 aspect of the matters in which the inquiry relates, as</p> <p style="text-align: center;">Page 6</p>
<p>1 per rule 5(2)(b). You have said that the focus of the 2 inquiry is one on the conduct and planning of the police 3 operation to disrupt the conspiracy, of which Mr Mason 4 was a party and not upon the conduct of the conspiracy 5 itself. 6 Of course, I take that point and understand the 7 important distinction between those two issues. 8 However, sir, we don't accept that that is correct. 9 We say, sir, with the greatest of respect, that you have 10 fallen into error in making that determination. Whilst 11 the conduct and planning may be the focus, the terms of 12 reference are of course much wider and so looking at the 13 words to what does the inquiry relate, and turning to 14 the terms of reference, if I can find them -- I have 15 them, thank you, I hope I have the right ones, but 16 certainly since I took them off the website, I hope they 17 are the right ones. 18 The focus here in terms of Mr Mason's role is 19 paragraph 3, and that is what the terms of reference 20 describe as I think implementation. 3.1, what occurred 21 on 11 December 2015, of course that is not just what 22 occurred through the eyes of the Metropolitan Police 23 Service, but what actually occurred, which may be two 24 different things. 25 In a sense what occurred reflects what this inquiry,</p> <p style="text-align: center;">Page 7</p>	<p>1 when it was just an inquest, was going to do and that is 2 to look at the circumstances of the death and so 3 Mr Mason is intimately connected with what occurred on 4 11 December, its build up, he is there during the course 5 of the shooting and obviously in the aftermath, so 6 looking at 3.3, what was done on the ground, in 7 particular the actions of the officers during the arrest 8 phase. Of course you have the evidence of the officers, 9 but he provides a counterfactual narrative: he is 10 a living witness who is able to speak from his 11 perspective as to what happened. The shooting, in 12 particular namely the circumstances in which the officer 13 who fired the fatal shot came to discharge his weapon. 14 Of course this is crucial, again, insofar as we are 15 aware of W80's account, and I will come to that in 16 a moment, sir. There is, on the face of it, and you 17 will have seen from certainly the witness evidence 18 provided to the IPCC, or IOPC, or the criminal 19 investigation from my client, that there is clearly 20 a dispute of fact there, and an important one if one is 21 to look at what it is W80 said about what Mr Baker was 22 alleged to be doing and what Mr Mason appears to 23 understand him to be doing -- there is clearly a dispute 24 to be resolved by this inquiry. 25 In addition to that, there is an issue about the</p> <p style="text-align: center;">Page 8</p>

<p>1 gun, its nature, its whereabouts and whether what it is 2 W80 says could possibly be correct. 3 Again, 3.5, was the command and control of the 4 operation conducted reasonably, in particular having 5 regard to the need to minimise to the greatest possible 6 extent the risk to life? Of course we appreciate that 7 matters such as those will be looked at through the lens 8 of expert evidence, which obviously we don't have sight 9 of, but that is just one element of the way in which one 10 looks at whether a command and control is conducted 11 reasonably. Those who were affected by those decisions 12 also properly have something to say and to add. 13 Those are the core aspects I would say of 14 paragraph 3, which shows that Mr Mason is intimately 15 bound up with what this inquiry is looking into. It may 16 be that what occurred after the shooting is something he 17 can also, at paragraph 4, assist the inquiry in 18 determining. 19 That is why we say, sir, when you make a ruling that 20 you did, that he doesn't have a significant interest in 21 an important aspect of the inquiry, that you are wrong. 22 Mr Mason, sir, sees himself, as you will have seen 23 from the latest submissions as a survivor, in the sense 24 that he considers that his life was put at risk on the 25 night his friend was fatally injured and whilst he</p> <p style="text-align: center;">Page 9</p>	<p>1 himself was not injured, he has been significantly 2 psychologically impacted by the experience, as set out 3 in the short submissions put forward by those 4 instructing me. 5 Sir, the question of Article 2 rights, in these 6 circumstances, is a somewhat complex one, whereas here 7 no physical injuries were suffered. I take CTI's point 8 that no authorities have been provided but, sir, one has 9 to look at my solicitor's submissions in the context of 10 having to turn them around very quickly and without 11 funding, but there are some analogies to be drawn from 12 the Strasbourg case law in relation to potentially 13 lethal accidents and fortuitous survival. The principle 14 in those cases is that in such a situation Article 2 15 applies either if the activity at issue was dangerous by 16 its very nature and put the life of the people concerned 17 at real and imminent risk or if the injuries suffered by 18 them were seriously life threatening. So there are some 19 analogies to be drawn, but in our submission, it is not 20 a matter that requires determination as such, because 21 obviously Article 2 is engaged in this inquiry insofar 22 as we are looking at the fatal shooting of a man by 23 a state agent, so that is uncontroversial. 24 Additionally, if you accept, as CTI appears to be 25 saying at paragraph 12, that he has a right of effective</p> <p style="text-align: center;">Page 10</p>
<p>1 participation, then in my submission, that right arises 2 because he does have a significant interest in core 3 aspects of the terms of reference and in particular 4 paragraph 3. 5 That participation, we say, requires core 6 participant status. I will tell you why we say that, as 7 shortly as I can, sir. 8 CTI say, at paragraph 13 of their submissions -- if 9 I could just take you to them, sir, if you have them: 10 "The refusal of core participant status does not 11 prevent Mr Mason from participating in this inquiry." 12 I want to look at that because what we say is what 13 is set out there is actually rights that are broadly 14 theoretical, indeed illusory, as things currently stand. 15 It is said: 16 "He has been asked to provide written evidence to 17 the inquiry, and may in his statement including any such 18 matters as he believes would assist." 19 Of course that is right, but that has come rather 20 late in the day and this inquiry is already underway. 21 Secondly, it is said at (b): 22 "Mr Mason has been provided with the necessary 23 disclosure relevant to his evidence." 24 Sir, this is where we take real issue. We say the 25 disclosure that he had provided is absolutely de</p> <p style="text-align: center;">Page 11</p>	<p>1 minimis. Incredibly, we say, he has not been provided 2 with any witness statements from W80. What is available 3 in the public domain of his account is all that we have 4 and that is not the way in which it should be, we say, 5 because it is clear that there is a factual dispute. He 6 ought to see that account and he will be able to assist 7 the inquiry. 8 We say he ought to be able to ask questions directly 9 when W80 gives that evidence. You can give whatever 10 weight to it but he has to have that statement and he 11 hasn't had it and that is why we say it is wrong to say 12 he has had the disclosure that he ought to have. 13 It is also said that he can attend the inquiry or 14 view the inquiry through livestream, should he wish to, 15 but of course -- it also says that he can access 16 transcripts and evidence and documents and through his 17 RLR raise any questions but of course, sir, his lawyers 18 are not funded to watch livestreaming, to read 19 transcripts and it is too much in my respectful 20 submission to expect a fragile layperson like him to 21 read these things on his own and then raise issues which 22 are pertinent to this inquiry. 23 Indeed, there are assumptions made that he has 24 access to the internet, to a laptop and the costs of 25 being able to -- the attendant costs of being able to</p> <p style="text-align: center;">Page 12</p>

1 access the inquiry in the way that it is suggested.
 2 Additionally, it is said and, lastly, should the
 3 chairman consider it necessary, he may choose to invite
 4 written closing submissions from Mr Mason.
 5 Well, thus far, that is not an indication that you
 6 have given, so that is why we say that those rights are
 7 only theoretical and are simply not sufficient, if you
 8 look behind what is said by CTL, to allow him to
 9 effectively participate in this inquiry.
 10 THE CHAIRMAN: Thank you.
 11 MS SIKAND: Sir, unless I can assist any further.
 12 THE CHAIRMAN: I think, if I may say so, particularly given
 13 the short time that you had to prepare your submissions,
 14 your assistance has been admirable. Thank you very
 15 much.
 16 MS SIKAND: Thank you, sir.
 17 MS BLACKWELL: Sir, I am now going to ask Ms Kaufmann
 18 whether she has any submissions she would like to make.
 19 MS KAUFMANN: No sir, the family don't have any submissions.
 20 THE CHAIRMAN: Thank you.
 21 MS BLACKWELL: Then I will turn to Mr Sheldon on behalf of
 22 the NCA, please.
 23 THE CHAIRMAN: Mr Sheldon, do you wish to say anything over
 24 and above that which is contained in your written
 25 submissions.

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1 Submissions by MR BUTT
 2 MR BUTT: Sir, also very briefly.
 3 In terms of the timing of the application, we have
 4 had a provisional witness list for some time that has
 5 named Mr Mason, we had assumed he had been informed
 6 earlier of his participation in the inquiry and indeed
 7 the inquest. If that assumption is wrong, then of
 8 course we take no point on it, that is why we expressed
 9 it in terms of an assumption.
 10 THE CHAIRMAN: Right.
 11 MR BUTT: In terms of his participation and his role in this
 12 inquiry, I also note the observations that Mr Sheldon
 13 picked up upon, that it seems, as the application was
 14 orally framed today, that which Mr Mason says he has
 15 an interest in concerns what happened within the Audi
 16 during the armed interception.
 17 I would observe that is very different from the much
 18 broader question of the planning of the operation and
 19 the firearms tactics that underlie it, which is the
 20 basis of Mr Mason's written application.
 21 However, if it is Mr Mason's position, as I now
 22 understand it, that his interest relates to what he was
 23 doing, what W80 was doing within the vehicle, that is
 24 classically the position of a witness and not a core
 25 participant.

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1 MR SHELDON: Sir, I do very briefly.
 2 THE CHAIRMAN: Yes.
 3 Submissions by MR SHELDON
 4 MR SHELDON: It is in fact by way of making I suspect the
 5 gradient a little less adverse for Ms Sikand than it
 6 might have been to start with, because the NCA now takes
 7 a neutral position in respect of this application as it
 8 is now framed.
 9 We had, as you know, opposed the initial
 10 application, which was put on a much wider basis. As it
 11 is now put, however, Mr Mason identifies his significant
 12 interest, as we understand it, as relating to the
 13 circumstances immediately surrounding the armed
 14 interception of the Audi.
 15 As you know, that is an aspect of the chronology in
 16 which the NCA had no involvement and as it seems to us,
 17 therefore, no direct interest in Mr Mason's application.
 18 That, sir, is why we don't seek to take a position
 19 on it, as now framed, one way or the other.
 20 THE CHAIRMAN: Thank you.
 21 MS BLACKWELL: May I now ask Mr Butt, please, on behalf of
 22 the MPS whether he has any additional submissions.
 23 THE CHAIRMAN: Yes, Mr Butt.
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1 To the extent that there are factual differences,
 2 those can be addressed in evidence as a witness, as is
 3 often the case in inquiries such as this.
 4 In tragic cases like this, there are often other
 5 occupants of the vehicle. There were two in the
 6 Grainger Inquiry, there were two in the Rodney Inquiry,
 7 none of those were core participants. In the Duggan
 8 inquest, Mr Hutchinson-Foster had supplied the gun to
 9 Mr Duggan, he was not an interested party.
 10 Everything that has been said underlines the fact
 11 that Mr Mason has an important but discrete factual
 12 dispute. We also respectfully agree with what CTI say,
 13 that not having a more detailed statement of Mr Mason,
 14 you might need to keep the matter under review, but on
 15 the present application, our submission is your advice
 16 from CTI is entirely correct and the application ought
 17 to be refused.
 18 THE CHAIRMAN: Thank you.
 19 Submissions by MS BLACKWELL
 20 MS BLACKWELL: Sir, upon receiving the letter from Markel
 21 Solicitors on 2 June of this year, you provisionally
 22 determined that this application should be refused
 23 because Mr Mason did not have a significant interest in
 24 an important aspect of the matters to which the inquiry
 25 relates, as per rule 5(2)(b).

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1 He has now renewed his application, both on paper
 2 and those submissions have now additionally been
 3 expanded by Ms Sikand before you this morning.
 4 THE CHAIRMAN: Yes.
 5 MS BLACKWELL: Even where an individual has a significant
 6 interest in an important aspect of the matters to which
 7 the inquiry relates, rule 5(1) provides you with a broad
 8 discretion as to whether or not to designate a person as
 9 a core participant. The factors of which you are well
 10 aware in rule 5(2) are neither a condition precedent to
 11 the granting of core participant status, nor decisive of
 12 the application if any one of them is met.
 13 In our submission, sir, an important relevant
 14 consideration for you reaching a decision on this
 15 application is the contribution that the applicant can
 16 provide to enable the inquiry to fulfil its terms of
 17 reference.
 18 Whilst, as you well know, Mr Mason was present for
 19 the police interception and can give an account of the
 20 moments in which that happened, he is unable to assist
 21 the inquiry with exploring the planning or preparation
 22 for that interception. Even less so because the
 23 evidence that the inquiry will hear confirms that until
 24 the interception took place, the police were unaware of
 25 his identity.

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1 MS BLACKWELL: Yes.
 2 THE CHAIRMAN: First of all, do you agree that he should?
 3 Secondly, do you agree that he cannot be expected to
 4 provide his witness statement until he has done so?
 5 MS BLACKWELL: First, in answering that question, it is
 6 right that you know, sir, that the inquiry has been in
 7 possession for some considerable time of a very detailed
 8 witness statement provided by Nathan Mason during the
 9 course of the IOPC investigation.
 10 THE CHAIRMAN: So he has made a statement already?
 11 MS BLACKWELL: He has made a statement.
 12 Before this morning, there has been no request on
 13 behalf of Mr Mason to be provided with those statements,
 14 despite there being correspondence between his
 15 solicitors and the inquiry in relation to the timing of
 16 his witness statement being provided. However, if you
 17 feel, sir, that that request, made as it is this
 18 morning, is something which finds favour, then of course
 19 we will provide those witness statements to his
 20 solicitor.
 21 THE CHAIRMAN: If it is accepted that he has a significant
 22 part to play --
 23 MS BLACKWELL: Yes.
 24 THE CHAIRMAN: -- as far as the events of 11 December are
 25 concerned, it might be thought that he should be in

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1 We remind you, sir, of section 17(3) of the
 2 Inquiries Act, that it requires you in making any
 3 decision as to the procedure or conduct of this inquiry,
 4 that you must act with fairness and we invite you to
 5 consider the following aspects of your discretion.
 6 First, that this inquiry began as an inquest and
 7 that the purpose of the inquiry is to investigate the
 8 circumstances in which Jermaine Baker lost his life.
 9 Although there have been cogent and you may think
 10 persuasive arguments that Mr Mason has a significant
 11 interest in relation to part 3 of the scope of the
 12 inquiry, as to what occurred on 11 December. As I have
 13 already set out, in reality, the interest that he has
 14 and the assistance that he can provide is extremely
 15 limited.
 16 Second, that in relation to the aspects of the
 17 inquiry with which Mr Mason is able to assist, it is
 18 possible for him so to do whilst participating as
 19 a witness.
 20 Although not yet received, the inquiry has requested
 21 from him a witness statement and we think that that is
 22 about to arrive imminently.
 23 THE CHAIRMAN: Ms Blackwell, I am sure that is right but
 24 complaint is made that the witness has seen no
 25 statements from W80.

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1 a position to address an account which may be different
 2 from his, notwithstanding that this is an inquisitorial
 3 rather than an accusatorial system.
 4 MS BLACKWELL: Of course, that can be done.
 5 As you know, sir, and as will be obvious from the
 6 submissions that I have made in relation to his
 7 representation, you have granted funding under
 8 section 40 of the Act for that representation. That
 9 will continue as it is required and of course any
 10 decision you make today, sir, is capable of being
 11 reviewed and reconsidered at any future time.
 12 I would also remind you, sir, of the responsibility
 13 that you have in relation to two aspects of the inquiry.
 14 First of all, the smooth running of the inquiry as
 15 far as the organisational aspects are concerned. Now,
 16 if as everybody seems to agree, the scope of the
 17 application has significantly narrowed this morning,
 18 then that is something which of course you will take
 19 into account. If the application were to be granted,
 20 the scope of the evidence and material that would have
 21 to be provided to Mr Mason would be less than was
 22 previously considered.
 23 However, there is a final consideration that you
 24 also must bear in mind and that is the cost.
 25 THE CHAIRMAN: Yes.

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1 MS BLACKWELL: You are aware of your responsibilities in
 2 that regard and if you felt that granting this
 3 application were to increase the cost in a way which was
 4 not justified, then that is something which you are
 5 entitled to weigh up in the balance of your discretion
 6 in making the determination which is invited of you this
 7 morning.
 8 There has been, prior to today, mention made by
 9 those representing Mr Mason that one of the aspects of
 10 the application which you will want to consider is
 11 whether or not it is likely that he, in his position,
 12 may attract criticism.
 13 THE CHAIRMAN: I don't think that point is being pursued.
 14 MS BLACKWELL: No, we don't agree that that is likely to be
 15 the case.
 16 THE CHAIRMAN: Ms Sikand has not raised that.
 17 MS BLACKWELL: In short, sir, having considered with care
 18 the written applications and listened to the oral
 19 submissions by all this morning, we invite you to
 20 determine that Mr Mason's involvement and active
 21 participation in this inquiry is capable of being
 22 satisfied by him remaining a witness and we invite you
 23 to reject the application.
 24 THE CHAIRMAN: Mr Penny, is there anything you want to say?
 25 MR PENNY: Nothing to say.

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1 Inquiry some 20 years ago and Duwayne Brooks had IP
 2 status immediately, no question of it --
 3 THE CHAIRMAN: Each case has to be decided on its own facts.
 4 MS SIKAND: Exactly, sir, and I only say this because you
 5 were reeled off a number of police shootings or other
 6 inquires or inquests when other people may or may not
 7 have been made IPs or CPs and I invite you, sir, to
 8 focus only on these facts, as you must.
 9 THE CHAIRMAN: No two cases are identical.
 10 MS SIKAND: Thank you, sir.
 11 THE CHAIRMAN: Thank you very much indeed.
 12 What I would like to do, I would like to rise.
 13 If I can, I will give a decision within the next
 14 half hour. Whatever that decision is, the reasons for
 15 it will follow.
 16 MS BLACKWELL: Sir, certainly I would invite you to take
 17 a break at this point and then we will consider --
 18 THE CHAIRMAN: When I say "will follow", I would think will
 19 follow by close of business tomorrow.
 20 MS BLACKWELL: Thank you very much, sir.
 21 THE CHAIRMAN: Does anybody object to that proposed course
 22 of action, so that at least everybody knows where they
 23 stand?
 24 Are you content with that, Ms Sikand?
 25 MS SIKAND: Sir, yes.

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1 THE CHAIRMAN: Thank you very much indeed.
 2 What I would like -- of course -- forgive me, no
 3 discourtesy intended.
 4 MS SIKAND: Certainly, it may be that you have heard more
 5 than enough from me.
 6 THE CHAIRMAN: Not at all.
 7 MS SIKAND: Just a short point.
 8 THE CHAIRMAN: Yes, please.
 9 Reply submissions by MS SIKAND
 10 MS SIKAND: Those acting for the Metropolitan Police Service
 11 say that he is classically in the position of a witness.
 12 He may be that, but that in and of itself does not
 13 preclude him also being a core participant. Insofar as
 14 you are assisted by examples that were given to you as
 15 to what happened in other inquiries, I want to make the
 16 point, because I made this inquiry before coming here,
 17 because there are those in my chambers who acted in the
 18 Duggan inquest, Mr Hutchinson-Foster never applied for
 19 core participant or IP status and it is important to
 20 bear that in mind.
 21 THE CHAIRMAN: Thank you.
 22 MS SIKAND: The question of whether he would have been
 23 granted it was never determined.
 24 If we are going to talk about witnesses to
 25 inquiries, I will add this in: I was in the Lawrence

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1 THE CHAIRMAN: Thank you very much indeed. I will rise.
 2 (10.10 am)
 3 (A short adjournment)
 4 (10.33 am)
 5 RULING
 6 THE CHAIRMAN: I have before me an application for core
 7 participation status made on behalf of Nathan Mason.
 8 I am very grateful to the submissions which I have
 9 heard this morning and, in particular, if I may say so,
 10 from Ms Sikand, Queen's Counsel, whose involvement was
 11 very late in the day but from who's attention to detail
 12 one would never have known it.
 13 This application will be refused for reasons which
 14 will be given in writing by close of business tomorrow.
 15 Notwithstanding that Nathan Mason's existing
 16 statement to the IPCC, as it then was, makes no mention
 17 of him seeing the shooting, I will require W80's witness
 18 statements to be made available to Nathan Mason's legal
 19 team before his witness statement is finalised. Those
 20 statements will be made available by solicitors to the
 21 inquiry by close of business today. The first draft of
 22 Nathan Mason's statement, which was originally due by
 23 close of business tomorrow after an extension was
 24 granted, will now be provided by close of business on
 25 Tuesday.

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1 Ms Sikand, thank you very much. There is no need
 2 for you to remain any longer.
 3 MS SIKAND: Thank you, sir.
 4 THE CHAIRMAN: I didn't want to keep you waiting any longer
 5 than necessary.
 6 MS SIKAND: Thank you, sir.
 7 MS BLACKWELL: Sir, may I invite you to rise once more very
 8 briefly whilst we rearrange the inquiry room?
 9 THE CHAIRMAN: Very good.
 10 MS BLACKWELL: Thank you.
 11 (10.36 am)
 12 (A short adjournment)
 13 (10.40 am)
 14 THE CHAIRMAN: Yes, Ms Blackwell.
 15 MS BLACKWELL: Thank you, sir. The person in the witness
 16 box is Catherine Hall. May I ask that she be sworn,
 17 please.
 18 THE CHAIRMAN: Yes.
 19 MS CATHERINE HALL (sworn)
 20 Questions from MS BLACKWELL
 21 MS BLACKWELL: Thank you, is your full name Catherine Hall?
 22 **A. It is, yes.**
 23 Q. Thank you. Is it Ms or Mrs Hall?
 24 **A. It is Ms.**
 25 Q. Ms Hall, I am going to ask you some questions about your

Page 25

1 **A. Obviously the police, HM Revenue & Customs, the National**
 2 **Crime Agency and the Home Office Immigration**
 3 **Enforcement.**
 4 Q. Is the organisation independent of those, is the IPCC,
 5 now IOPC, independent of those organisations?
 6 **A. Yes.**
 7 Q. Right. Is it also independent of the Government?
 8 **A. Yes.**
 9 Q. Right. Are the cases taken on by your organisation
 10 overseen by a commission delegate?
 11 **A. Yes. In the IPCC days it used to be overseen by**
 12 **a commissioner. Since the invention of the IOPC, it is**
 13 **now a commission delegate.**
 14 Q. Thank you. At the outset of an investigation, is a lead
 15 investigator appointed and they then take on the
 16 responsibility for the day-to-day running of the
 17 investigation?
 18 **A. Yes, that's correct.**
 19 Q. Does that involve the taking of witness statements and
 20 interviewing subjects to the investigation and
 21 analysing, for instance, CCTV footage, reviewing
 22 documents and obtaining any forensic or expert evidence
 23 that is required?
 24 **A. Yes, that's correct.**
 25 Q. Is the lead investigator supported by a team of other

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1 role within the IOPC, and that will include your
 2 involvement in preparing the report on behalf of what
 3 was the IPCC in this case.
 4 So that you know, and everybody else knows what your
 5 evidence is going to entail, it will form the following.
 6 Firstly, I am going to ask you some questions about
 7 the IOPC as an organisation and your role within it.
 8 Then I am going to ask you to confirm and to set the
 9 scene in relation to some of the factual elements of
 10 this case, the background to the interception on
 11 11 December and the shooting of Jermaine Baker.
 12 I am then going to ask you about the manner in which
 13 the IPCC became involved and their investigation, the
 14 conclusions that were reached and also the
 15 recommendations that were made.
 16 Let me begin, please, by inviting you to provide
 17 an explanation as to the organisation itself.
 18 In doing so, I am going to invite you to provide
 19 that explanation in the terms in which it is set out in
 20 annex 2 to the IPCC report.
 21 The IOPC carries out its own independent
 22 investigations into complaints and incidents involving
 23 a number of agencies; is that right?
 24 **A. That's correct.**
 25 Q. What are those agencies, please, Ms Hall?

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1 investigators, lawyers, press officers and other
 2 specialised staff?
 3 **A. Yes.**
 4 Q. During the course of the investigation, is there
 5 meaningful and regular updates given to both families
 6 and stakeholders who may have an interest in the
 7 organisation?
 8 **A. Yes.**
 9 Q. Is there also a series of reviews that takes place
 10 during the course of the investigation?
 11 **A. Yes.**
 12 Q. Is there ever any need for the investigator to make
 13 contact with the Crown Prosecution Service?
 14 **A. Yes, sometimes that is during an investigation,**
 15 **sometimes it is at the conclusion of the investigation.**
 16 Q. Once all of the material thought to be necessary has
 17 been gathered and considered, is there then a report
 18 written by the lead investigator setting out the results
 19 and conclusions?
 20 **A. Yes, that's correct.**
 21 Q. Will the commission delegate then be provided with that
 22 report and is it their responsibility to decide whether
 23 or not to make individual or wider recommendations?
 24 **A. Yes, that's correct.**
 25 Q. In relation to misconduct proceedings, does the report

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1 given to the appropriate authority responsible for the
 2 subjects of the investigation set out whether or not
 3 such proceedings are recommended?
 4 **A. Yes, initially, it will be an opinion and then we wait**
 5 **for the appropriate authority to respond.**
 6 Q. Upon that response, what then happens?
 7 **A. It depends what the response is, regarding whether the**
 8 **appropriate authority agrees with the recommendations**
 9 **and opinions or whether they disagree and the rationale**
 10 **for those disagreements.**
 11 Q. Who at the IOPC considers the response of the
 12 appropriate authority?
 13 **A. The commission delegate.**
 14 Q. If the commission delegate decides that the misconduct
 15 proceedings should be commenced, what then happens?
 16 **A. The first stage after the AA have responded is that**
 17 **there could be a recommendation from their commission**
 18 **delegate with the rationale for that and then if the**
 19 **appropriate authority still disagree, then the**
 20 **commission delegate can direct that gross misconduct**
 21 **proceedings are heard.**
 22 Q. In relation to criminal proceedings, if there is
 23 an indication following the report's conclusion that
 24 a criminal offence may have been committed, is the case
 25 referred at that point to the Crown Prosecution Service?

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1 powers of a constable?
 2 **A. Yes.**
 3 Q. Were you assisted in your investigation from the outset
 4 by a team of people within the IPCC?
 5 **A. Yes, that's correct.**
 6 Q. Did you, during the course of your investigation,
 7 consult with the Crown Prosecution Service special crime
 8 and counter-terrorism division?
 9 **A. Yes, that's correct.**
 10 Q. Thank you.
 11 Just pausing for a moment and dealing with your
 12 experience at the time that you conducted this
 13 investigation. Had you in 2015 carried out many
 14 investigations into deaths following police contact?
 15 **A. Yes.**
 16 Q. Including numerous police shootings?
 17 **A. Yes, that's correct.**
 18 Q. Had you at that stage undertaken training in the role of
 19 silver commander, or TFC, to aid your understanding of
 20 your role?
 21 **A. Yes, that's correct.**
 22 Q. Had you also completed several exercises in a police
 23 firearms training environment?
 24 **A. Yes.**
 25 Q. Had you delivered presentations nationally regarding the

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1 **A. Yes, again, it is the commission delegate's decision to**
 2 **refer it.**
 3 Q. Finally, in relation to inquests, is the investigation
 4 report and supporting documentation that lies behind it
 5 provided to a coroner if indeed inquest proceedings have
 6 been commenced?
 7 **A. Yes.**
 8 Q. Thank you.
 9 I am going to turn now to deal with your position
 10 within the IPCC, as it was, at the time of the shooting
 11 in December 2015.
 12 At that point, Ms Hall, were you employed as
 13 an operations manager?
 14 **A. Yes.**
 15 Q. In fact do you still hold that position today?
 16 **A. I do.**
 17 Q. Have you held that position for the last 17 years?
 18 **A. Yes.**
 19 Q. Were you then, as an operations manager, designated
 20 under paragraph 19 of schedule 3 of the Police Reform
 21 Act of 2002 to carry out the independent investigation
 22 into the death of Jermaine Baker who died on
 23 11 December 2015?
 24 **A. Yes.**
 25 Q. Under paragraph 19(4) of the same Act, did you have the

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1 IPCC role in post-incident procedure, or PIP procedure?
 2 **A. Yes.**
 3 Q. In addition, did you also sit on the national armed
 4 policing working group?
 5 **A. Yes, still do.**
 6 Q. Which at that time was chaired by, as he then was, DCC
 7 Simon Chesterman?
 8 **A. Yes.**
 9 Q. Thank you.
 10 I am now going to turn, please, Ms Hall, to invite
 11 you to provide an outline of the background to Operation
 12 Ankaa.
 13 For your note, sir, the relevant information that
 14 I am about to lead comes from paragraph 33 of the IPCC
 15 report and following.
 16 THE CHAIRMAN: Thank you.
 17 MS BLACKWELL: Was Operation Ankaa a proactive operation
 18 conducted by a team of officers from SCO7?
 19 **A. Yes, that's right.**
 20 Q. Did it stem from a much larger MPS investigation, known
 21 as Operation Utara?
 22 **A. Yes.**
 23 Q. Were you aware or did you become aware of the senior
 24 investigating officer's identity?
 25 **A. Yes.**

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1 Q. Was that DI Rob Murray?
 2 **A. Yes.**
 3 Q. You came to understand that Operation Utara was
 4 an operation which had spanned a number of years
 5 relating to organised crime carried out by groups in
 6 north London?
 7 **A. Yes.**
 8 Q. Primarily focused upon groups of people of Turkish
 9 descent?
 10 **A. Yes, that's correct.**
 11 Q. All right.
 12 On 13 October 2015, did Mr Izzet Eren and
 13 Mr Erwin Amoyaw-Gyamfi become arrested as a result of
 14 Operation Utara?
 15 **A. Yes.**
 16 Q. Did that arrest take place on that day in the following
 17 circumstances, that they were stopped by the police in
 18 possession of a loaded Skorpio sub-machine gun and
 19 a loaded Tokarev semi-automatic handgun?
 20 **A. Yes.**
 21 Q. Right.
 22 Can you confirm, please, that on 29 October both men
 23 pleaded guilty to the firearms offences, including
 24 possession with intent, and were they remanded in
 25 custody and were due to be sentenced at Wood Green Crown

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1 transit from Wormwood Scrubs to Wood Green Crown Court
 2 on the morning of 11 December?
 3 **A. Yes, that's correct.**
 4 Q. During the course of Operation Ankaa, did the MPS become
 5 aware that Ozcan Eren had access to a vehicle in the
 6 Wood Green area of London, which it was anticipated
 7 would be used during the escape plan?
 8 **A. Yes, that's correct.**
 9 Q. Did the MPS thereafter locate a stolen vehicle in
 10 Eastern Road in Wood Green and was that vehicle an Audi
 11 bearing false number plates, KM13 YPT?
 12 **A. Yes.**
 13 Q. On 8 December, did that vehicle become equipped with
 14 covert listening equipment --
 15 **A. Yes.**
 16 Q. -- as part of the MPS plan to foil the escape during the
 17 course of 11 December?
 18 **A. Yes.**
 19 Q. Thank you.
 20 Having reached the stage that we have in terms of
 21 the background, and dealt with the key personnel who
 22 were known to be involved in the operation at the time,
 23 I am going to invite you to deal with some of the
 24 aspects of what took place on 11 December.
 25 In the days and weeks prior to 11 December, was

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1 Court on 11 December?
 2 **A. That's correct.**
 3 Q. Was information received during Operation Utara and
 4 after the arrests of Eren and Amoyaw-Gyamfi indicating
 5 that there was an ongoing plan to effect the escape of
 6 Mr Eren from lawful custody?
 7 **A. Yes.**
 8 Q. Was it that information that caused Operation Ankaa to
 9 be born?
 10 **A. Yes, that's correct.**
 11 Q. Did the MPS use various investigative techniques during
 12 Operation Ankaa in order to obtain evidence relating to
 13 the escape plan.
 14 **A. Yes.**
 15 Q. Did the MPS become aware that one of the key
 16 conspirators was the cousin of Mr Eren, Ozcan Eren?
 17 **A. Yes.**
 18 Q. Who, from time to time, throughout the course of the
 19 papers, was erroneously described as Izzet Eren's
 20 brother, but was in fact his cousin?
 21 **A. His cousin.**
 22 Q. Thank you.
 23 Specifically, did the MPS come to understand that it
 24 was the intention of Ozcan Eren, and others unknown, to
 25 free Izzet Eren from a prison van whilst he was in

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1 information received by the MPS that the persons
 2 planning the escape attempt for 11 December were
 3 attempting to source a real firearm?
 4 **A. Yes, that's correct.**
 5 Q. But, despite numerous attempts, that was not successful?
 6 **A. Yes.**
 7 Q. On 10 December, did the MPS become aware that, as of
 8 that evening -- that is the night before the planned
 9 escape attempt -- only a replica firearm had been made
 10 accessible to those planning the escape?
 11 **A. Yes.**
 12 Q. Just to confirm, Ms Hall, at that stage, the night
 13 before the planned escape, was there any information
 14 known to the MPS about the involvement or identities of
 15 Jermaine Baker, Nathan Mason or Gokay Sogucakli?
 16 **A. No.**
 17 Q. Although during the course of your investigation, you
 18 obtained and considered a wealth of material dealing
 19 with the planning, as in the police planning, of what
 20 occurred on 11 December, including access to both audio
 21 recorded and transcripts of some of the briefings --
 22 **A. Hmm.**
 23 Q. -- I am not going to take you through that material this
 24 morning, you will be pleased to hear.
 25 **A. Thank you.**

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1 Q. But that did become part of your investigation, did it
 2 not?
 3 **A. Yes, it did.**
 4 Q. What I am going to do though, in order to set the scene,
 5 is to ask you to confirm some of the events that took
 6 place on 11 December.
 7 Due to the relatively complex nature of this
 8 organisation, and the number of specialist MPS units
 9 involved. Did the MPS decide to run their side of the
 10 operation from a Covert Operations Room known as C3000?
 11 **A. Yes, that's right.**
 12 Q. Was the command structure on the morning of
 13 11 December -- sir, for your note I am now at
 14 paragraph 205 of the report -- as follows: was the
 15 strategic firearms commander Detective Superintendent
 16 Craig Turner?
 17 **A. Yes.**
 18 Q. Was the tactical firearms commander Detective Chief
 19 Inspector Williams, also known throughout your report by
 20 the cipher FE16?
 21 **A. Yes, that's correct.**
 22 Q. Was the firearms tactical adviser an officer currently
 23 known by the cipher S48?
 24 **A. Yes, that's right.**
 25 Q. Were there three teams of MPS staff who were deployed on

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1 **A. Yes, that's right.**
 2 Q. Thank you.
 3 Just to complete the command structure, the OFC, the
 4 operational firearms commander in relation to Team B,
 5 was an officer currently known by the cipher S111?
 6 **A. Yes.**
 7 Q. Thank you.
 8 I have made reference to briefings.
 9 Did you become aware during the course of your
 10 investigation that there were briefings which took place
 11 prior to 11 December, but specifically on the morning of
 12 the operation, can you confirm that there were a series
 13 of briefings that took place at different locations
 14 relating to each of the teams which I have mentioned?
 15 **A. Yes, that's right.**
 16 Q. Thank you.
 17 Did you become aware that, as a result of the
 18 technical equipment which had been inserted into the
 19 Audi on 8 December, it was possible from around about
 20 6.00 on the morning of 11 December, for those within
 21 a Covert Monitoring Post in the same building as the
 22 room C3000 to follow what was being discussed by those
 23 present in the Audi vehicle?
 24 **A. Yes, that's right.**
 25 Q. As part of your investigation, did you listen to the

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1 the morning of 11 December around the Wood Green area?
 2 **A. Yes.**
 3 Q. Team A included staff deployed around the prison van?
 4 **A. Yes.**
 5 Q. Made up of officers from SCO19 and SCO35?
 6 **A. Yes.**
 7 Q. Team B included staff deployed around the Audi
 8 vehicle --
 9 **A. Yes.**
 10 Q. -- KM13 YPT. And that team included officers drawn from
 11 SCO19 and SCO35?
 12 **A. Yes.**
 13 Q. Team C deployed around the movements of Ozcan Eren and
 14 was made up from officers from SCO35?
 15 **A. Yes, that's right.**
 16 Q. Detective Chief Inspector Williams, as the overarching
 17 tactical firearms commander, was based in the operation
 18 room at C3000?
 19 **A. Yes, that's right.**
 20 Q. But there were also two ground tactical firearms
 21 commanders who were to travel in control vehicles in two
 22 of the teams. The tactical firearms commander on the
 23 ground, with responsibility for Team B, was somebody
 24 known by the cipher FE1 in your report, who was
 25 Detective Inspector Keely Smith?

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1 product of that probe and did you read the transcripts
 2 that had been subsequently prepared of the conversation
 3 that was heard?
 4 **A. Yes, I did.**
 5 Q. Thank you.
 6 I would like to take you, please, Ms Hall to,
 7 shortly before 7.30 on the morning of 11 December, when
 8 I hope you can confirm there was a radio transmission,
 9 amongst the teams which I have already described, of the
 10 words "firearm enabled"?
 11 **A. Yes, that's correct.**
 12 Q. Did you consider the use of that phrase and did you
 13 obtain witness statements from the officers on the
 14 ground, including information from them as to their
 15 understanding of that phrase?
 16 **A. Yes, that's correct.**
 17 MS BLACKWELL: I am now at paragraph 350, sir.
 18 THE CHAIRMAN: Thank you.
 19 MS BLACKWELL: Did one of the OFCs tell you this:
 20 "It was circulated over the working channel that
 21 this offence will be firearms enabled. This information
 22 came from C3000. I knew where the intel was coming
 23 from, and know that this meant the fact was known as
 24 opposed to assumed."
 25 **A. Yes, that's right.**

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1 Q. Can you just explain to us what you understood by the
2 information provided by that officer when he described
3 the information as being known rather than assumed?
4 **A. From recollection, that they thought that that term**
5 **meant that "firearms enabled" meant that the people in**
6 **the Audi had firearms.**
7 Q. Right.
8 Was S105, in that witness statement, describing the
9 level of certainty that he felt in relation to that
10 phrase, given that he realised it was coming from the
11 conspirators themselves?
12 **A. Yes, that's right.**
13 Q. Can you confirm, please, Ms Hall, that, as far as your
14 investigation is concerned, that reflects what others
15 said too?
16 **A. Yes.**
17 Q. Did there come a time over the course of the morning,
18 indeed within about an hour and a half of that phrase
19 being provided over the radio channels to those officers
20 on the ground, that the tactical firearms commander,
21 DCI Williams, called what is called state amber?
22 **A. Yes, that's right.**
23 Q. Did that happen in fact at 8.57 am?
24 **A. Yes.**
25 Q. At that stage, did those in Team B who were situated in

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1 The animation serves as a recreation of the scene
2 prior to the incident occurring and is based on measured
3 survey data captured at the scene on 11 December and
4 also on 22 February the following year.
5 What we are about to see then is for indicative
6 purposes only and all the vehicles are not necessarily
7 depicted in their exact and actual locations at the time
8 of the incident.
9 You will also see, sir, that there are what appear
10 to be rather strange markings on the vehicles. Please
11 ignore those, they are the result of the manner in which
12 this has been put together but I do hope that this
13 provides some helpful detail as to what would have been
14 seen by the officers driving up the Close at the time.
15 THE CHAIRMAN: Thank you.
16 MS BLACKWELL: Thank you, Mr Coates.
17 (Animated video footage was played to the inquiry)
18 (11.11 am)
19 MS BLACKWELL: Thank you.
20 Of course if at any time during the currency of the
21 inquiry you wish to see that again, sir, we can play it
22 for you.
23 THE CHAIRMAN: Thank you.
24 MS BLACKWELL: Having been able to picture what the police
25 vehicles would have seen coming up Bracknell Close,

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1 four vehicles, Alpha, Bravo, Charlie and the control
2 vehicle, make their way into Bracknell Close?
3 **A. Yes, that's right.**
4 Q. Right.
5 I am going to ask that we look at what is called
6 a fly through, sir, which is a piece of footage that has
7 been prepared by the Metropolitan Police, and it helps
8 to set the scene.
9 Mr Coates, please could we put up -- I see you are
10 ahead of me -- IPC1166. Can we pause, please, at the
11 next part of the footage which describes in better
12 detail than I could do the manner in which this has been
13 put together:
14 It is an animation through a 3D laser scan and it is
15 the pre-incident scene.
16 If we could just pause there, please.
17 What you will see, sir, is the Audi vehicle and the
18 silver BMW, which was located beside it, they were
19 unable to be surveyed in completeness at the time of the
20 attendance of officers on 11 December, so they have been
21 retrospectively placed in the scene by way of what is
22 called point cloud matching, between existing data and
23 subsequently resurveyed data sets.
24 Please don't ask me to explain that in any further
25 detail.

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1 I would now like to look together at another plan, it is
2 a static plan, which some may have already seen during
3 the course of my opening.
4 Mr Coates, it is IMQ21, please.
5 This plan has its origins in your investigation,
6 doesn't it, Ms Hall?
7 **A. Yes, that's right.**
8 Q. Because it was during the course of the IPCC
9 investigation that the plan itself was drawn. However,
10 the inquiry's policing experts, Mr Arundale and
11 Mr Burrows, have inserted onto your plan the positioning
12 of the various officers at the time first of all when
13 the vehicle stopped -- we can see the positions that
14 they were occupying in cars Alpha, Bravo and Charlie --
15 and then, latterly, when they came out and they
16 approached the Audi.
17 **A. Yes, that's right.**
18 Q. First of all, please, Ms Hall, can you confirm that, as
19 we look at the top third of the plan, and the
20 positioning of the police vehicles when they arrived in
21 Bracknell Close, that the positions designated to each
22 of those officers accord with your investigation?
23 **A. Yes, they do.**
24 Q. Thank you.
25 Secondly, in terms of the lower part of the plan,

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1 when those officers were situated around the Audi
 2 vehicle, does that broadly accord with the result of
 3 your investigation?
 4 **A. Yes, that is correct.**
 5 Q. Thank you.
 6 I am now at paragraph 523, sir.
 7 Just to set the scene, did you receive, Ms Hall,
 8 a statement from S111 that included the following
 9 information, that as he approached the car, he was aware
 10 that there were believed to be armed men inside the
 11 vehicle. His main thought was to get vision into the
 12 vehicle, which he was going to do by smashing the front
 13 passenger window with the muzzle of his weapon. He
 14 could not see the through the side window or the
 15 windscreen and, although he made an attempt to break the
 16 glass whilst shouting "armed police", he was
 17 unsuccessful in doing so, at which point he was told to
 18 "push on" or words to that effect, by W80, and he did
 19 that, moving to the rear of the vehicle?
 20 **A. Yes, that's right.**
 21 THE CHAIRMAN: Which paragraph was that, please, sorry?
 22 MS BLACKWELL: It is paragraph 523, sir.
 23 THE CHAIRMAN: Thank you. Yes.
 24 MS BLACKWELL: Did you become aware that shortly thereafter,
 25 upon W80 opening the front passenger door of the

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1 taken of that firearm, together with a receipt purported
 2 to come from the place and time at which it was
 3 purchased.
 4 Mr Coates, please could we display MPS1322.
 5 I am afraid, sir, that the receipt is not very
 6 clear.
 7 THE CHAIRMAN: But you can tell us its date -- not from
 8 that, but I wondered if you had any --
 9 MS BLACKWELL: Of course, I have a better copy of it. If
 10 you give me a moment, please.
 11 I certainly cannot read it from that. We are
 12 obtaining the information from it.
 13 THE CHAIRMAN: Thank you.
 14 MS BLACKWELL: It is clearer on our system than it is on the
 15 court system, but for the time being, could you confirm,
 16 please, Ms Hall, that what we see on the left-hand side
 17 of the screen are two images of the same replica firearm
 18 which was found in the footwell as I have described?
 19 **A. Yes, that's right.**
 20 Q. Thank you.
 21 It was purchased, sir, on 28 October 2015.
 22 THE CHAIRMAN: Thank you.
 23 MS BLACKWELL: We will be able to provide you with the
 24 details that were given by the person who purchased it.
 25 I can tell you now that he described himself as Mr Ali.

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1 vehicle, he discharged his weapon into Jermaine Baker?
 2 **A. Yes, that's right.**
 3 Q. Causing a shot that proved to be fatal?
 4 **A. Yes, that's right.**
 5 Q. Did you consider the treatment provided to Mr Baker,
 6 both by the officers at the scene and then shortly
 7 thereafter by the London Ambulance Service and those who
 8 came by helicopter?
 9 **A. Yes.**
 10 Q. Did you consider that the treatment that he had
 11 received, whilst unsuccessful, was adequate in the
 12 circumstances?
 13 **A. Yes, I did.**
 14 Q. Before we leave the scene and move on to your
 15 involvement with W80, and the first stage at which the
 16 IPCC became involved in this matter, I just would like
 17 through you, please, to establish what was found in the
 18 Audi vehicle, once the occupants had been extracted from
 19 it.
 20 **A. Yes.**
 21 Q. Can you confirm that in the rear footwell behind the
 22 driver's seat in the vehicle, was found a BB gun styled
 23 in the shape and style of an Uzi sub-machine gun?
 24 **A. Yes, that's right.**
 25 Q. I am going to ask, please, that we look at an image

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1 It will occur to you, sir, then, that this replica
 2 firearm was purchased on the day before the first
 3 aborted attempt on 29 October.
 4 In fact, before we turn to deal with W80, I would
 5 just like through you, please, Ms Hall, to deal with the
 6 Serco van and what, as part of your investigation, you
 7 came to understand as to the van itself, the hiding of
 8 parts of a mobile phone that had been used by Izzet Eren
 9 and also the route that the vehicle was to take, so that
 10 we can set the scene in terms of why the conspirators
 11 were settled in Bracknell Close.
 12 **A. Yes.**
 13 THE CHAIRMAN: There is nothing else of significance found
 14 in the rear of the car?
 15 MS BLACKWELL: No.
 16 THE CHAIRMAN: Thank you.
 17 MS BLACKWELL: There was a metal bar in fact, but we can
 18 come to deal with that.
 19 THE CHAIRMAN: Thank you.
 20 MS BLACKWELL: Can we take that down, please, Mr Coates and
 21 can we put up MPS4024.
 22 Now then, just so that we can familiarise ourselves
 23 with what we see here, if we look towards the top
 24 left-hand side of the plan, we can see an X with the
 25 words "Bracknell Close" and we can see that that is

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1 situated on Bracknell Close, close to its junction with
 2 Olympus Grove, that comes round from the first part of
 3 where Bracknell Close is.
 4 If we look below that box to the next one, we can
 5 see where Wood Green Crown Court is situated.
 6 To the right of that there is a box indicating
 7 Winkfield Road.
 8 Then on the far right of the plan we can see the
 9 marking of Lordship Lane.
 10 **A. Yes, that's right.**
 11 Q. In relation to this final part of the journey that the
 12 van was due to take that morning, are you able to
 13 confirm, please, Ms Hall, that the van would have could
 14 have down Lordship Lane, from right to left as we see it
 15 on the plan, turned right up Winkfield Road, left down
 16 Bracknell Close and then made its way into what is the
 17 rear of Wood Green Crown Court, and close in proximity
 18 to where the X is located on the Crown Court building is
 19 the place where the prison van would have entered that
 20 building?
 21 **A. Yes, that's right.**
 22 Q. Thank you.
 23 Can we take that down, please, Mr Coates and put
 24 up --
 25 THE CHAIRMAN: So it would have gone right past the point

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1 a corridor within the van with doors off it. Are those
 2 the doors to the individual cells in which the prisoners
 3 are placed?
 4 **A. Yes, that's right.**
 5 Q. We can see on the far right that cell door is given the
 6 number 6. Is that the cell in which Izzet Eren was
 7 placed on the morning of 11 December?
 8 **A. Yes, it was.**
 9 Q. Thank you. Can we take that down, please, and replace
 10 it with MPS1323.
 11 Again, moving from left to right, we can see now
 12 into cell number 6, is that a photograph depicting the
 13 seating area of where Izzet Eren would have been
 14 sitting?
 15 **A. Yes.**
 16 Q. Thank you.
 17 Then we can see what looks as if it is a grille at
 18 the bottom of the seating area, within which there
 19 appears to have been hidden the parts of a mobile
 20 telephone by Izzet Eren which he had been using on his
 21 journey to the Crown Court that morning?
 22 **A. Yes, that's right.**
 23 Q. Thank you.
 24 Yes, thank you, can we take that down, please.
 25 I am going to move now to deal with your first

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1 where the car was parked?
 2 MS BLACKWELL: Yes, it would.
 3 THE CHAIRMAN: Could we put up MPS1320, please.
 4 This is a photograph on the left-hand side of the
 5 prison van. You cannot quite make out the registration
 6 number, but can you confirm, Ms Hall, that that was the
 7 van that had been carrying Izzet Eren that morning?
 8 **A. Yes, that's right.**
 9 Q. We can see on the left-hand photograph, if we look very
 10 carefully, that there are four windows in what is the
 11 left hand passenger side of the van -- thank you very
 12 much. If we go from the front of the vehicle towards
 13 the rear, the second of those windows is in fact placed
 14 within a door?
 15 **A. Yes.**
 16 Q. That is the door by which the prisoners are loaded on to
 17 and unloaded out of the van?
 18 **A. Yes, that's right.**
 19 Q. Thank you.
 20 Could we go back to the full -- thank you.
 21 If we look at the second photograph towards the
 22 right, is that a photograph depicting the inside of the
 23 doorway once it is opened?
 24 **A. Yes, that's right.**
 25 Q. Moving further over to the next photograph, we see

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1 involvement, having set the scene of what took place.
 2 Did the IPCC become involved in this matter as
 3 investigators shortly after the shooting had taken
 4 place?
 5 **A. Yes, we did.**
 6 Q. Are you able to describe, please, Ms Hall, the
 7 practicalities of how that happens?
 8 **A. Yes, of course.**
 9 **Out of hours, so from 5.00 in the evening until 9.00**
 10 **in the morning we have an on-call out-of-hours team and**
 11 **during the day, from 9.00 till 5.00, we have what we**
 12 **would call a day response team.**
 13 Q. Yes.
 14 **A. Any call from any police force goes into our assessment**
 15 **centre, who then refer it to the day response team in**
 16 **the locality of where the incident took place.**
 17 Q. Right, and in this particular situation, who was that?
 18 **A. The operations team leader, who was the day response,**
 19 **was Steve Foxley, and he took the initial call from the**
 20 **assessment unit after the MPS had called them to tell**
 21 **them about the incident involving Jermaine.**
 22 Q. Thank you, and was it then referred to you as a death or
 23 serious injury, which is also known as a DSI?
 24 **A. Yes, that's correct, and Mr Foxley informed me as the**
 25 **operations manager straight away and then I made various**

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1 **decisions about what to do.**
 2 Q. Right.
 3 May we look at some of those decisions then, please,
 4 Ms Hall.
 5 It may assist us if we have up on the screen,
 6 please, Mr Coates, document MPS168.
 7 Thank you. For the moment, let's just look at the
 8 full document itself, so that you can familiarise
 9 yourself with it. Can you confirm, please, Ms Hall,
 10 that this is a set of minutes from what is described at
 11 the top of the document as a critical incident meeting?
 12 **A. Yes, that's right.**
 13 Q. Can you describe to the inquiry, please, the
 14 circumstances in which such a meeting as this would take
 15 place?
 16 **A. When the IPCC takes on a new investigation, we can**
 17 **declare whether it is a critical incident for the**
 18 **organisation. Where we declare that that is a critical**
 19 **incident, then we will have a critical incident meeting,**
 20 **and this was one of those.**
 21 Q. We can see at the top of this document, listed, the
 22 attendees, including the commissioner, Cindy Butts,
 23 a press officer, head of legal services and others.
 24 Were you present at this meeting?
 25 **A. Yes, I was.**

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1 investigation update, at paragraph 2f, the following
 2 words:
 3 "There was a provisional identification of the
 4 deceased, Jermaine Baker, date of birth 16/3/87. He had
 5 not been finger printed but he was one of the targets of
 6 operation and his tattoos matched the description on the
 7 PNC. His ethnicity is given as black, although he
 8 appears quite light skinned, possibly mixed race. If it
 9 is him, he lives in Tottenham."
 10 **A. Yes, that's right.**
 11 Q. What had been achieved by this point on the afternoon of
 12 11 December by way of positive identification of
 13 Mr Baker?
 14 **A. As the minute there says, that Mr Baker had been**
 15 **identified through his tattoos but his fingerprints**
 16 **hadn't been taken at that time.**
 17 Q. So that we understand, how would Mr Baker's tattoos
 18 enable him to be identified?
 19 **A. There was a record of them on the Police National**
 20 **Computer.**
 21 Q. Thank you.
 22 This note suggests that Mr Baker had been one of the
 23 targets of the operation. We established earlier on in
 24 your evidence that, in fact, at the time of the
 25 interception, the police were unaware that Mr Baker,

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1 Q. Right. We can see you in fact towards the bottom as
 2 operations manager.
 3 The timing of the meeting suggests that it began at
 4 4.00, lasted for an hour and a half. There was then
 5 a break and then it continued at 5.45. It says that the
 6 group met by conference call. Where were you when you
 7 attended this meeting?
 8 **A. From recollection, I was in our offices in Croydon, and**
 9 **some of the participants were in our office in Holborn,**
 10 **so that is why we did a conference call.**
 11 Q. Right.
 12 What had you done in terms of the beginnings of your
 13 investigation prior to this meeting taking place?
 14 **A. I deployed teams of people to undertake various**
 15 **enquiries. I deployed two operations team leaders, one**
 16 **to the scene of the incident and one to the**
 17 **post-incident procedure.**
 18 Q. Right.
 19 Were you able, during the course of this meeting, to
 20 update your colleagues with what you had put in place
 21 and the results of any early investigation that had
 22 taken place?
 23 **A. Yes, I was.**
 24 Q. Mr Coates, please could we highlight the bottom third of
 25 the page. We can see here that during the course of the

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1 Jermaine Baker, was going to be present in the Audi
 2 vehicle. He had not been identified. Can you with that
 3 understanding, explain what this record means, that he
 4 was one of the targets?
 5 **A. My understanding of that minute is that it meant**
 6 **somebody who was present in the Audi and that it wasn't**
 7 **a member of the public or a police officer.**
 8 Q. Right, okay, so it wasn't meant to suggest that the
 9 operation had been focused upon him?
 10 **A. No, not at all.**
 11 Q. Thank you.
 12 THE CHAIRMAN: He was an individual who was in the Audi?
 13 **A. Yes, that's correct, sir.**
 14 THE CHAIRMAN: That is why -- he becomes a target because he
 15 is there, not because of anything that is known about
 16 him beforehand?
 17 MS BLACKWELL: Thank you, sir.
 18 **A. That's correct.**
 19 THE CHAIRMAN: Whilst you are looking at that document, can
 20 you just go back a little bit further up.
 21 There is reference to one or two prisoners in
 22 paragraph 2a.
 23 MS BLACKWELL: Yes.
 24 I am just going to read that into the record:
 25 "The incident arose from a pre-planned surveillance

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1 to intercept a gang allegedly trying to spring one or
 2 two prisoners from a prison van on the way to Wood Green
 3 Crown Court."
 4 As well as Izzet Eren, within the prison van that we
 5 have just looked at were two other prisoners, weren't
 6 there, there was Erwin Amoyaw-Gyamfi and another person
 7 which it is not necessary to name?
 8 **A. Yes, that's right.**
 9 Q. At the time this note was made, during the course of
 10 this meeting, was it known how many of those present in
 11 the prison van were intending to escape?
 12 **A. Not specifically, it was very early stage of the**
 13 **investigation.**
 14 Q. Thank you.
 15 THE CHAIRMAN: It could have been one, two or three?
 16 MS BLACKWELL: Yes.
 17 THE CHAIRMAN: Yes.
 18 MS BLACKWELL: If we could go back to the full document,
 19 please, Mr Coates, there are one or two additional
 20 aspects of this which I would like to ask you about,
 21 please, Ms Hall.
 22 The first is at the bottom of this page, at letter
 23 (j).
 24 As at the time that this note was made, can you
 25 confirm that the next of kin of Jermaine Baker had not

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1 **a message that is delivered by the police force. Even**
 2 **in police investigations where they have family liaison**
 3 **officers, it is not the family liaison officer that**
 4 **delivers the message, because then the family can**
 5 **associate that tragic news with that person, which is**
 6 **not the best way to build up a relationship.**
 7 Q. Because the family liaison manager has a role to fulfil
 8 during the course of the investigation and it is their
 9 role to liaise very closely with the family, to keep
 10 them appropriately informed of information as the
 11 investigation progresses and to be really their closest
 12 point of contact?
 13 **A. Yes, that's correct.**
 14 Q. The inquiry heard from Tia Demetrio yesterday, in her
 15 evidence, that it was an IPCC person who provided that
 16 information to her. Can you confirm whether or not in
 17 your understanding that is right?
 18 **A. I'm sorry, I can't recollect who provided it to Tia.**
 19 Q. All right, thank you.
 20 May we go down to paragraph (n), please, which is
 21 a little further down this page.
 22 At (n) we see this recorded in the notes:
 23 "There was no body-worn video because it is not
 24 issued to specialist firearms officers."
 25 **A. Yes, that's correct.**

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1 been informed of his death?
 2 **A. Yes, that is right.**
 3 Q. There is then this reference:
 4 "FLM was on standby."
 5 What is that a reference to?
 6 **A. That is a family liaison manager, and that person had**
 7 **been appointed by me to be the link between the family**
 8 **of Jermaine and the investigation team.**
 9 Q. Right. The note continues:
 10 "In the course of the meeting, a number of updates
 11 were received. First it was confirmed that the MPS had
 12 identified the mother and sister. They wished the IPCC
 13 FLM to deliver the death message. In discussion it was
 14 agreed that this was not appropriate."
 15 First of all, the death message is the phrase used
 16 to denote the information conveyed to the next of kin,
 17 that their loved one has died?
 18 **A. Yes, that's right.**
 19 Q. Secondly, can you explain to the inquiry why, within the
 20 discussion during the course of this meeting, it was
 21 agreed that it was not appropriate for the IPCC family
 22 liaison manager to provide that information to the
 23 family?
 24 **A. Yes. It is something that had never been done before,**
 25 **to my knowledge at the time, and it is normally**

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1 Q. Was that your understanding of the position in 2015?
 2 **A. Yes. That's right.**
 3 Q. During the course of your investigation, did you become
 4 aware of whether or not those officers involved in
 5 arresting Izzet Eren and Erwin Amoyaw-Gyamfi on
 6 13 October, had been wearing body-worn video facilities?
 7 **A. I can't recall, sorry.**
 8 Q. All right.
 9 Finally, before we move away from this document, at
 10 paragraph 3(a), just a little bit further down, please,
 11 Mr Coates:
 12 "CB [that is Cindy Butts] reported that she had
 13 already made contact with Reverend Nims Obunge and
 14 Shefik Mehmet of the local community based on early
 15 reports that the deceased may be of Turkish origin."
 16 **A. Yes.**
 17 Q. You have explained why that mistake had been made in
 18 terms of Mr Baker's origin, but could you just explain
 19 to us what that note refers to, what contact had been
 20 made with those people by Cindy Butts and why?
 21 **A. In any incident that involved a community, we would**
 22 **always make contact with that community to explain our**
 23 **role and to try and give them confidence in the**
 24 **investigation that we were doing in the first steps.**
 25 Q. Thank you.

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1 I want to ask you some specific questions, please,
 2 about W80 and his engagement with the IPCC. In
 3 particular, one matter which the inquiry has been asked
 4 to probe, and that is the decision by the IPCC at one
 5 stage to take hold of W80's passport and the reason for
 6 that.
 7 Were you personally involved in that?
 8 **A. I wasn't personally involved in taking the passport, but**
 9 **I was involved in the decision making regarding the**
 10 **taking of the passport.**
 11 Q. Could you explain why that matter arose, please.
 12 **A. The matter arose after W80 had gone missing and he had**
 13 **been found and it was one of the conditions of his bail,**
 14 **that he would surrender his passport.**
 15 Q. Was there subsequently, just to finish off this area of
 16 questioning, a reason to attempt to discover whether or
 17 not the passport contained an Australian visa?
 18 **A. Yes, there was.**
 19 Q. Could you explain the circumstances behind that, please?
 20 **A. Yes, in December 2016, I received a request from W80's**
 21 **friend or one of those assisting him that the bail**
 22 **conditions were amended to allow him to travel to**
 23 **Australia. The reason for looking for the Australian**
 24 **visa was that I was informed at the time that this had**
 25 **been a pre-planned trip prior to the incident on**

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1 **The purpose of the post-incident procedure is to**
 2 **facilitate the investigation and also to look after the**
 3 **welfare of the officers involved.**
 4 **One of the things that the investigation team need**
 5 **from the post-incident procedure is further information**
 6 **about what has actually occurred and then personal**
 7 **initial accounts from the officers that are deemed to be**
 8 **key policing witnesses in that incident.**
 9 Q. How are those personal incident -- sorry, did you say --
 10 **A. Personal initial accounts.**
 11 Q. Personal initial accounts, thank you. How practically
 12 are those captured by the investigators?
 13 **A. They are written by the officers themselves and there**
 14 **can be numerous ways in that is achieved, but on this**
 15 **occasion an IOPC investigator was sat in the room with**
 16 **the officers while they made their personal initial**
 17 **accounts. That is to ensure that the officers do not**
 18 **talk about what they are putting in their initial**
 19 **accounts, so that it is their individual recollection of**
 20 **what they faced.**
 21 Q. The inquiry has heard and will hear evidence of the fact
 22 that prior to those officers involved in the
 23 interception leaving the scene they were given a verbal
 24 warning, I think by Detective Inspector Keely Smith, not
 25 to confer with each other.

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1 **11 December 2015, and that the visa was already in the**
 2 **passport.**
 3 Q. Did you discover that that was the case?
 4 **A. I can't actually recall whether the visa was in the**
 5 **passport. However, the request at that time was**
 6 **declined anyway.**
 7 Q. Right, so although permission had been sought for him to
 8 use that visa in order to travel to a pre-planned trip
 9 to Australia, in the event that permission was not
 10 provided by you?
 11 **A. Yes.**
 12 Q. It was declined and he was not allowed to go?
 13 **A. It would have been the custody officer's decision, but**
 14 **I made my representations.**
 15 Q. Thank you.
 16 I would like to move on to ask you some questions
 17 about the post-incident procedures.
 18 What do they entail, as far as the IOPC is
 19 concerned, how much involvement does the IOPC have in
 20 the post-incident procedures and what are the
 21 imperatives, what are the aspects of the procedure that
 22 are crucial to the course of the investigation?
 23 **A. Okay, a post-incident procedure is held in almost all**
 24 **deaths where the police were involved and a number of**
 25 **other incidents where it is deemed appropriate.**

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1 Is that something that you would expect to happen in
 2 this situation?
 3 **A. Yes, absolutely.**
 4 Q. Although you have described a procedure during which the
 5 officers sit and write their own initial accounts in
 6 a room with an IOPC officer present, in this case, did
 7 that happen with more than one of those officers in the
 8 same room together?
 9 **A. Yes, from recollection, they were in the same room and**
 10 **that is why we had a member of staff present. Sometimes**
 11 **it is appropriate to split the officers up but sometimes**
 12 **it is more practical for them all to be in the same room**
 13 **and to have a member of staff present to ensure that**
 14 **there is no conferring.**
 15 Q. That person present would be there to supervise, that
 16 person would not be asking questions of each of the
 17 officers in the presence of the other officers?
 18 **A. No, they sit in the corner and remain silent.**
 19 Q. Right. That is what happened on this occasion?
 20 **A. Yes.**
 21 Q. Right. Was W80 part of that procedure?
 22 **A. Yes, he was.**
 23 Q. Did you become aware of the findings of the post mortem
 24 which was conducted upon Mr Baker's body on
 25 12 December 2015, and, having been provided with the

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1 results from Dr Randall, were you of the view that W80's
 2 use of force may not have been justified, and did that
 3 lead you to consider whether or not the officer should
 4 be arrested for a criminal offence?
 5 **A. Yes, that's correct.**
 6 Q. What are the procedures adopted to contact somebody in
 7 W80's situation as well as the MPS, the organisation
 8 employing him, and also perhaps the CPS? Can you
 9 describe to the inquiry what happens when you come to
 10 that decision, that there may have been an unjustified
 11 use of force?
 12 **A. Yes, I mean we would, and did, inform the department of**
 13 **professional standards within the Metropolitan Police**
 14 **and also the post-incident manager, who was overseeing**
 15 **the post-incident procedure. The reason why the**
 16 **post-incident manager is informed was because the**
 17 **officers were due back on the Monday, which was the**
 18 **14th, to do their detailed accounts and we didn't want**
 19 **W80 as part of that process.**
 20 Q. Right. So you informed the MPS of your decision to
 21 declare the investigation criminal --
 22 **A. Yes, that's right.**
 23 Q. -- a criminal one, and the MPS informed W80 of that
 24 decision on the evening of Sunday, 13 December?
 25 **A. Yes, that's correct.**

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1 **a notice of investigation outlining the allegations**
 2 **against W80.**
 3 Q. Would that have accompanied the suspension papers?
 4 **A. Yes.**
 5 Q. Police Sergeant Mick Burke, who was a Police Federation
 6 representative, had arranged to meet W80 at home on the
 7 Monday afternoon but nobody was able to successfully
 8 contact him, were they?
 9 **A. Yes, that's right.**
 10 THE CHAIRMAN: Contact who?
 11 MS BLACKWELL: W80.
 12 THE CHAIRMAN: Thank you.
 13 MS BLACKWELL: When W80's partner returned home, and
 14 informed the officers that she believed that W80 had
 15 gone into London, to his Leman Street base, it was
 16 established that that was not the case and at around
 17 5.00 that afternoon, local searches were commenced to
 18 try and find him and shortly after that he was declared
 19 as a high-risk missing person?
 20 **A. Yes, that's right.**
 21 Q. Can you then confirm, please, that the MPS commenced
 22 a missing person's investigation, which the homicide
 23 task force were asked to lead on?
 24 **A. Yes.**
 25 Q. Did the MPS department of professional standards also

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1 Q. Did you ask that W80 attend your office in Croydon on
 2 the Monday morning?
 3 I am so sorry, the Wednesday morning. I think it
 4 was the 16th.
 5 **A. Yes.**
 6 Q. Yes.
 7 The intention was for him to be interviewed on that
 8 occasion?
 9 **A. Yes.**
 10 Q. But at about 11.00 on the Sunday evening, were you
 11 informed, either personally or your organisation
 12 informed by Assistant Commissioner Pat Gallan that W80
 13 had been told at that stage of the criminal
 14 investigation and was there a decision taken to have his
 15 warrant card removed?
 16 **A. Yes, that's right.**
 17 Q. Can you confirm that at that stage W80 was given another
 18 warning not to confer with any of his colleagues about
 19 what had happened?
 20 **A. Yes, that's right.**
 21 Q. Can you confirm that shortly after lunchtime on
 22 14 December, so that is the Monday, suspension papers
 23 were prepared and sent to Superintendent Dobinson(?)?
 24 **A. Yes, it is the Metropolitan Police that prepares the**
 25 **suspension papers but the IPCC, as was then, prepared**

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1 assist?
 2 **A. Yes.**
 3 Q. Were you involved in the subsequent investigations and
 4 inquiries that were undertaken over the next couple of
 5 days?
 6 **A. Not specifically in relation to W80.**
 7 Q. Right.
 8 But by 2.40 on the afternoon of 16 December, that is
 9 the Wednesday, the day that he was expected to attend
 10 your Croydon office for interview, W80 had made a call
 11 home and had given the location details of where he was
 12 to his family and family liaison officers then spoke to
 13 him and brought him home?
 14 **A. Yes.**
 15 Q. Was it then discovered that, during the period of his
 16 absence, he had attempted suicide?
 17 **A. Yes, that's right.**
 18 Q. Can you confirm that he was taken by MPS staff to
 19 hospital and he received medical treatment?
 20 **A. Yes, he was.**
 21 Q. The following day, W80 did attend for the first of what
 22 were to be three interviews with the IPCC?
 23 **A. Yes, he did.**
 24 Q. What was done to determine whether or not W80 was fit to
 25 be interviewed on 17 December.

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1 **A. He was seen by a member of medical staff whilst in**
 2 **custody, who deemed him fit for interview.**
 3 Q. Was he represented throughout that interview?
 4 **A. Yes, he was.**
 5 Q. During the course of that interview, can you confirm,
 6 please, Ms Hall, that graphic photographs of
 7 Jermaine Baker's body were shown to W80?
 8 **A. Yes, they were.**
 9 Q. Would you describe that as a normal procedure?
 10 **A. Yes.**
 11 Q. Is that something which you have engaged in in other
 12 similar cases?
 13 **A. Yes, I mean it is essential that you put critical**
 14 **evidence to somebody during an interview. Whilst we**
 15 **would always take into account the sensitivities of**
 16 **these, it was deemed on this occasion that this was**
 17 **critical evidence and therefore it was put to him in the**
 18 **interview.**
 19 Q. For what purpose?
 20 **A. Following the post mortem, that is when the status of**
 21 **W80 had changed from being a key policing witness to**
 22 **a subject of the investigation, and that was on the**
 23 **findings by Professor Randall at the post mortem about**
 24 **the injuries to Jermaine's wrist, and it was that**
 25 **photograph of the injuries that was put to W80 during**

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1 **have thought at that point that we would have had body**
 2 **diagrams available to us. They would quite often be**
 3 **something that is prepared for a trial, which could be**
 4 **months if not years further along.**
 5 THE CHAIRMAN: Thank you.
 6 MS BLACKWELL: Sir, I may, I am afraid, be guilty of
 7 misleading, because I have suggested to Ms Hall that
 8 this took place during the interview on 17 December. In
 9 fact, the photograph, which is described on our system
 10 as "graphic", although I will of course provide to you,
 11 sir, the photograph itself, if we can identify it, was
 12 shown not on 17 December but on 4 February --
 13 THE CHAIRMAN: Thank you.
 14 MS BLACKWELL: -- of the following year.
 15 Do you accept therefore, Ms Hall, that by
 16 4 February, it would have been possible to obtain body
 17 diagrams rather than showing the photograph?
 18 **A. Yes, quite possibly.**
 19 Q. Thank you.
 20 For the sake of completeness, can you confirm that
 21 the final interview that was conducted by the IPCC with
 22 W80 took place on 11 August, of the same year, 2016?
 23 **A. Yes, it did.**
 24 Q. Thank you.
 25 In relation to all three interviews W80 chose to

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1 **that interview.**
 2 THE CHAIRMAN: Just a photograph of the injuries to the
 3 wrist?
 4 **A. I can't recall exactly, but from my understanding, it**
 5 **was the left wrist, but whether those photographs showed**
 6 **the rest of Jermaine's torso, I can't recall.**
 7 THE CHAIRMAN: Because it might be perceived as one thing to
 8 show somebody for a good reason a photograph of
 9 an injury to a wrist, but another thing to show far more
 10 graphic photographs which would inevitably be
 11 distressing, for whoever was looking at them.
 12 **A. Yes, I understand that, sir. It was the interview team**
 13 **that decided what disclosure to make and I cannot**
 14 **specifically recall which specific photographs were put.**
 15 THE CHAIRMAN: It may be a matter of record.
 16 MS BLACKWELL: I think it is, sir.
 17 My information at this moment in time is that the
 18 photograph depicted the bullet wound to the wrist and
 19 the neck.
 20 THE CHAIRMAN: Yes, was any consideration given to deploying
 21 the use of body diagrams, as are frequently and almost
 22 exclusively used during the course of murder trials, to
 23 avoid the necessity for distress being caused to anyone
 24 by the disclosure of the photographs themselves?
 25 **A. Sorry, sir, I can't recall specifically but I wouldn't**

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1 make no comment to all of the questions that were put?
 2 **A. Yes, he did.**
 3 Q. I am going to come back, towards the end of your
 4 evidence, to ask you some questions about that procedure
 5 and police officers' usual practice in not answering
 6 questions during interviews.
 7 I am about to move on very briefly to deal with the
 8 chronology of your investigation relating to
 9 Mr Williams.
 10 THE CHAIRMAN: Is that a convenient time for a mid-morning
 11 break?
 12 MS BLACKWELL: I think it is, yes, thank you.
 13 THE CHAIRMAN: Shall we say 12.10, is that sufficient for
 14 everybody?
 15 MS BLACKWELL: It is, thank you.
 16 THE CHAIRMAN: Very good.
 17 (11.59 am)
 18 (A short adjournment)
 19 (12.12 pm)
 20 THE CHAIRMAN: Ms Blackwell, I raised earlier or asked
 21 a question indicating that I might have had concerns as
 22 to the propriety or otherwise of showing unnecessarily
 23 graphic pictures to a suspect, but of course he was
 24 legally represented at all times, wasn't he?
 25 MS BLACKWELL: Yes, he was.

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1 On that point, I have been asked by Mr Penny to
 2 confirm through this witness that in fact there were
 3 nine such photographs shown, not just one.
 4 I know that because Ms Hall was not present during
 5 the interview, she may not be able to confirm that but
 6 armed with that information, we are going to be able to
 7 provide to you, sir, a full description of that which
 8 was shown to him. You are of course right, he was
 9 legally represented throughout.
 10 THE CHAIRMAN: Well, I know what I would have done if I had
 11 been his solicitor, but there we are.
 12 MS BLACKWELL: Whilst we are on that point, please, and
 13 indeed it was a very convenient time to break because
 14 I have been informed that I need to make another
 15 correction, which is -- again, Ms Hall, I do this
 16 through you and I simply ask you to confirm that what
 17 I am saying is correct. That when W80 went missing, it
 18 was at a time prior to him having confirmation that the
 19 interview was due to take place on 16 December?
 20 **A. Yes, that's correct.**
 21 Q. Thank you.
 22 Just before we move on to deal with DCI Williams,
 23 could I ask please, Mr Coates, that we put back up onto
 24 the screen the document depicting the Serco van route,
 25 which is MPS4024.

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1 Williams and his part in the planning of the operation
 2 on 11 December?
 3 **A. From the outset of the investigation, we -- as the**
 4 **inquiry has already heard -- were looking at the**
 5 **planning stages of the investigation and the**
 6 **individuals' roles in that.**
 7 **From recollection, Mr Williams became a subject of**
 8 **our investigation following a report written by**
 9 **an expert that we had commissioned to assist in our**
 10 **understanding of the tactics, policies and procedures**
 11 **that should be followed.**
 12 Q. Was that person Chief Superintendent Hartley?
 13 **A. Yes, that's right.**
 14 Q. All right. Did that occur after the time at which the
 15 terms of reference for the investigation were approved
 16 by Cindy Butts on 5 January 2016?
 17 **A. Yes, I can't remember the exact month but it was some**
 18 **time after that.**
 19 Q. Right. I am not going to take you through the whole of
 20 the terms of reference, but simply to confirm that they
 21 begin in this way:
 22 "To investigate the circumstances surrounding the
 23 fatal shooting of Mr Baker at around 9.00 am on Friday,
 24 11 December in Bracknell Close, Wood Green, north
 25 London."

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1 Thank you.
 2 Just familiarising ourselves again with what this
 3 shows, and seeing whereabouts on Bracknell Close the
 4 Audi, around about, the Audi was situated. Sir, I can
 5 confirm with the assistance of Mr Butt that in fact the
 6 route that was set out with this witness prior to the
 7 break is in fact not right.
 8 The route that the vehicle had to take to get into
 9 the cell area of the Crown Court would have been as
 10 follows.
 11 True, it would have come up Lordship Lane and turned
 12 right into Winkfield Road but almost immediately, where
 13 you can see the words "Crown Close", it would have
 14 turned left into that short roadway which ends in what
 15 looks like a turning circle.
 16 THE CHAIRMAN: Yes.
 17 MS BLACKWELL: That is, I am told, the only way in which the
 18 vehicle -- thank you very much, Mr Coates -- would have
 19 been able to finish its journey.
 20 I hope that that is now clear.
 21 THE CHAIRMAN: Well, it may give rise to a number of
 22 questions, but I shan't ask them.
 23 MS BLACKWELL: No, nor shall I at this stage. Thank you.
 24 Right, at which stage, Ms Hall, did you begin to
 25 investigate the behaviour of Detective Chief Inspector

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1 **A. Yes, that's right.**
 2 Q. Having had the opportunity to consider Chief
 3 Superintendent Hartley's report that had been
 4 commissioned by you, was Neil Williams served with
 5 a notice of investigation on 28 July 2016?
 6 **A. Yes, that's right.**
 7 Q. Was the original notice with which he was served later
 8 amended and provided to his representatives on
 9 10 August?
 10 **A. Yes, that's right.**
 11 Q. Was that because there was originally some concern about
 12 missing material which, in fact, turned out not to be
 13 something which could be determined to be anything to do
 14 with DCI Williams?
 15 **A. Yes, that's right.**
 16 Q. Was the amended notice signed by him on 18 August 2016?
 17 **A. Yes.**
 18 Q. Did you consider at that time that the severity of the
 19 allegations within that notice could amount to gross
 20 misconduct?
 21 **A. I did.**
 22 Q. Was that because of what you have described as concerns
 23 that you had about the manner in which he had planned
 24 the operation, including the way in which the briefings
 25 had been conducted and the form of words relating to

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1 intelligence that had been given during those briefings
 2 and within the documentation?
 3 **A. Yes, that's right.**
 4 Q. Was Detective Chief Inspector Williams interviewed on 18
 5 and 24 August 2016?
 6 **A. Yes.**
 7 Q. Did he provide no comment to all of the questions put?
 8 **A. Yes, that's right.**
 9 THE CHAIRMAN: Now, these of course were not criminal
 10 proceedings? These were disciplinary proceedings,
 11 misconduct proceedings?
 12 **A. Yes, sir. I can't remember whether we had considered**
 13 **the offence of misconduct in a public office at that**
 14 **time. I would have to refer to --**
 15 THE CHAIRMAN: Whether you had or not, he was not under
 16 arrest?
 17 **A. No. No, sir.**
 18 MS BLACKWELL: Were the interviews conducted under caution?
 19 **A. Yes.**
 20 THE CHAIRMAN: Thank you.
 21 MS BLACKWELL: Just to confirm, in relation to DCI Williams
 22 and W80, whilst they exercised their right not to make
 23 a comment during the interview, each of them following
 24 each of the interviews that they underwent, provided
 25 statements to the IPCC based upon the questions that

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1 **A. Whereas under the 2020 regulations, there is a duty to**
 2 **cooperate with the investigation. Obviously that is**
 3 **open to different interpretation, dependent on what**
 4 **investigation it is.**
 5 Q. Right. I am going to attempt to assist you, I hope, by
 6 quoting from the regulations, that says:
 7 "Police officers have a responsibility to give
 8 appropriate cooperation during investigations, inquiries
 9 and formal proceedings, participating openly and
 10 professionally in line with the expectations of a police
 11 officer, when identified as a witness."
 12 **A. Yes.**
 13 Q. That does not remove the right for anybody, including
 14 a police officer, in the position that we have described
 15 from making no comment?
 16 **A. No.**
 17 THE CHAIRMAN: What is the title of the regulations --
 18 MS BLACKWELL: It is the "Duties and responsibilities
 19 standard of professional behaviour".
 20 THE CHAIRMAN: Duties and responsibilities -- brackets or
 21 comma?
 22 MS BLACKWELL: Neither.
 23 THE CHAIRMAN: Standards of professional behaviour,
 24 regulations --
 25 MS BLACKWELL: It is the 2020 regulations, which I believe

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1 they had been asked during the interviews?
 2 **A. Yes, that's correct.**
 3 Q. This may be a convenient moment for us to discuss the
 4 police complaints and conduct regulations of 2013, which
 5 were in place at the time of these interviews taking
 6 place. Those regulations were used to require officers
 7 to attend for witness interviews; is that right?
 8 **A. Yes.**
 9 Q. Were those the correct regulations covering the
 10 situation faced by W80 and DCI Williams?
 11 **A. Because they -- yes, they were, but because W80 was**
 12 **a criminal matter as well, it was --**
 13 Q. He was in a different position to DCI Williams?
 14 **A. Yes.**
 15 Q. Has there since that time been a document entitled
 16 "Duties and responsibilities, standards of professional
 17 behaviour" brought into force in 2020?
 18 **A. Yes, that's right.**
 19 Q. Can you explain to the chair what lay behind that and
 20 how, if at all, it affects the situation which we are
 21 discussing?
 22 **A. Yes.**
 23 **Prior to the 2020 regulations, officers could turn**
 24 **up for interviews and not give an account.**
 25 Q. Yes.

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1 are the police complaints and conduct regulations,
 2 reissued in 2020 with this amendment.
 3 THE CHAIRMAN: Thank you.
 4 MR SIMPSON: I wonder whether it helps me to assist at this
 5 point, with the title of the document?
 6 THE CHAIRMAN: There you are, you see, you never thought
 7 that greatness would be thrust upon you, did you?
 8 MR SIMPSON: I didn't.
 9 The standard of professional behaviour that counsel
 10 to the inquiry is referring to is in fact in schedule 2
 11 to the police (conduct) regulations of 2020.
 12 THE CHAIRMAN: Police (conduct) regulations 2020,
 13 schedule 2?
 14 MR SIMPSON: Schedule 2 sets out all of the standards of
 15 professional behaviour, including the one on duties and
 16 responsibilities.
 17 THE CHAIRMAN: So schedule 2 sets out the duties and
 18 responsibilities and standards of professional
 19 behaviour?
 20 MR SIMPSON: It sets out the standards of professional
 21 behaviour and includes one standard, which is of duties
 22 and responsibilities. The wording that counsel to the
 23 inquiry has just read out is in that standard contained
 24 within there.
 25 THE CHAIRMAN: Thank you very much.

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1 Thank you very much.
 2 MS BLACKWELL: Thank you.
 3 I was establishing that, although it doesn't remove
 4 the right to make no comment during the course of
 5 an interview, it provides guidance as to the level of
 6 cooperation that is expected of a police officer?
 7 **A. Yes, it does.**
 8 Q. Thank you.
 9 Were there ever investigations into the behaviour of
 10 any other specific officer, and by that I mean
 11 commanding officer, during the course of your
 12 involvement?
 13 **A. No other officer's conduct was the subject of**
 14 **a misconduct notice and therefore specifically, other**
 15 **than to look at the whole investigation and planning of**
 16 **it.**
 17 Q. Right.
 18 During the course of your investigation, is this
 19 right, that you would have considered the professional
 20 behaviour of everybody involved, particularly those in
 21 positions of command and control, and I am thinking in
 22 particular the tactical command officers, and the
 23 strategic command officer and the operational officers
 24 who were in charge on the ground, but after your
 25 investigation was complete, the only matters by way of

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1 within the data. Information has been received from W80
 2 that he was involved in Operation Ankaa from around
 3 Sunday, 6 December 2015. Therefore, to ensure the
 4 request remains proportionate, it is requested that the
 5 data sought be within the time parameters of the week
 6 commencing Monday, 30 November 2015 until Friday,
 7 11 December 2015."
 8 Mr Coates, could we go to the next page, please, to
 9 see who has created and signed this document.
 10 We can see at the top there that the applicant for
 11 this material is Detective Sergeant Rob McPhee and it is
 12 made on 22 March 2016.
 13 Are you familiar with this document?
 14 **A. Yes, I am.**
 15 Q. Can you explain to the inquiry what it is and why it was
 16 created?
 17 **A. This was a request from our investigation team for the**
 18 **email account and anything associated for W80, to try**
 19 **and establish if there was anything on those accounts**
 20 **that would lead to what he was briefed and what he knew**
 21 **and who he had discussed the matters with.**
 22 Q. Did you receive cooperation from the MPS?
 23 **A. Yes.**
 24 Q. Were you provided with a series of electronic
 25 communications?

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1 misconduct that were brought were in relation to W80 and
 2 Detective Chief Inspector Williams?
 3 **A. Yes, that's right.**
 4 Q. Right.
 5 I would like to ask you some questions, please,
 6 about steps taken by your organisation to secure
 7 electronic digital and communications data relevant to
 8 the operation.
 9 Could we display, please, Mr Coates, IPC318, page 2.
 10 Thank you. Could we highlight box 4 at the top third of
 11 the page. Thank you.
 12 This part of this document suggests:
 13 "The IPCC are requesting that the MPS email and
 14 associated drives of W80 be downloaded and provided to
 15 the IPCC in order to establish what information was
 16 known to W80 about Operation Ankaa/Utara prior to the
 17 intervention on 11 December 2015. The IPCC are seeking
 18 to establish who told him what and when. It is possible
 19 that some of the information may have come via
 20 electronic communications (email) and that W80 may have
 21 been involved in generating briefing and other documents
 22 for Operation Ankaa that are likely to be held on MPS
 23 servers. This information is necessary as it is key to
 24 the investigation. It may also assist the defence or
 25 undermine the prosecution case depending on the findings

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1 **A. Yes.**
 2 Q. Once you had received that material, were you able to
 3 analyse it?
 4 **A. Yes.**
 5 Q. What was your conclusion?
 6 **A. From recollection, again, there was nothing substantial**
 7 **that assisted the investigation.**
 8 Q. When you had been provided with that material, may
 9 I ask, was it provided to you in hard copy format or
 10 were you provided with access to the electronic
 11 communications themselves?
 12 If you cannot remember, please say so.
 13 **A. I can't remember.**
 14 Q. However it was provided to you, would that material have
 15 been stored within the IPCC offices?
 16 **A. Yes.**
 17 Q. Then at what stage, if at all, would it have been
 18 returned to the MPS, or would it remain with you
 19 following the conclusion of your investigation?
 20 **A. If we were provided with evidence, it should remain with**
 21 **us.**
 22 Q. Right. If or however that material was provided to you,
 23 has that in turn been provided to the inquiry?
 24 **A. Yes.**
 25 Q. Thank you.

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1 Did you also make the decision to apply to see and
 2 consider and analyse any material held by the NCA?
 3 **A. Yes, we did.**
 4 Q. Right. I am not going to ask you about the material
 5 that you were given access to, but I am going to ask you
 6 about the circumstances in which that access was
 7 provided to you.
 8 Did that entail you, and your colleague Liz Parsons,
 9 attending at NCA premises, considering the material and
 10 within the rules and regulations with which you have to
 11 comply, did you leave any notes that you made of your
 12 examination at those premises?
 13 **A. Yes, we did.**
 14 Q. Did that procedure enable you to have sufficient access
 15 to the material?
 16 **A. We were given access to all of the material, but the**
 17 **process for that access was difficult, in that all our**
 18 **notes and the material remained with the NCA.**
 19 Q. Right.
 20 **A. Therefore, the further -- as the report was being**
 21 **drafted, some of the content of that report was being**
 22 **done from memory.**
 23 Q. I think, for the sake of completeness, and of course you
 24 know this, sir, because it was as a result of your
 25 request that these errors were corrected, on three

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1 **have staff welfare and numerous entries in their**
 2 **daybooks that do not relate to specifically what the**
 3 **IPCC is investigating.**
 4 **Therefore, the system that we tend to adopt is that**
 5 **we will review the daybook to make sure that we have**
 6 **access to all that material, but we will not seize the**
 7 **daybook, we will leave the daybook with the officer and**
 8 **just take photocopies of the relevant extracts from that**
 9 **daybook that relate to whatever we are investigating.**
 10 Q. Right, were you satisfied that you had received
 11 everything that you expected to receive by way of
 12 daybook entries from that officer?
 13 **A. Yes.**
 14 Q. In a similar vein, when your investigation drew to
 15 a close, was there any aspect of material that you had
 16 requested or issues that you had raised which had not
 17 been completed?
 18 **A. Not that I can recall.**
 19 Q. Can you confirm, please, Ms Hall, what your
 20 recommendations were and to whom they were made?
 21 **A. The conclusion of the investigation, I put my**
 22 **recommendations into the report and it was that W80**
 23 **should be referred to the CPS and also that he should**
 24 **face a misconduct proceedings for gross misconduct.**
 25 **In relation to FE16, Mr Williams, the recommendation**

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1 occasions within the original version of the final
 2 report there was a date which had to be corrected
 3 following the chair's invitation to do that.
 4 **A. Yes, that's correct.**
 5 Q. Is that what you are describing --
 6 THE CHAIRMAN: That was when this was still an inquest,
 7 wasn't it?
 8 MS BLACKWELL: It is, it is.
 9 When you were wearing a different hat.
 10 That is what you were describing?
 11 **A. That's right.**
 12 Q. Thank you.
 13 Another specific question about your investigation,
 14 and that is in relation to daybooks. Did you seek
 15 access to the daybooks of the officers involved, and in
 16 particular I would like to ask you about the senior
 17 investigating officer, DI Murray.
 18 **A. Yes, we sought and had access to the daybook.**
 19 Q. Can you explain to the inquiry the procedure that is
 20 adopted in relation to daybooks, are you provided with
 21 the whole of an officer's daybook, which may relate to
 22 this and a plethora of other cases or are you provided
 23 by the officer with specific pages?
 24 **A. Yes, a daybook is exactly what it says and an officer**
 25 **will normally have multiple incidents, they might even**

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1 **was that he should face misconduct only.**
 2 Q. Right. What date did you make those recommendations?
 3 **A. It was some time in November 2016, but I can't recall**
 4 **the exact date.**
 5 THE CHAIRMAN: It is a matter of record.
 6 MS BLACKWELL: It is, sir, thank you.
 7 The reason that I ask is that by the date that your
 8 recommendations had been made, had Detective Chief
 9 Inspector Williams retired from the force?
 10 **A. Yes, he had.**
 11 Q. What was the effect of that retirement?
 12 **A. That misconduct proceedings could not take place against**
 13 **him as a retired officer.**
 14 Q. Were you aware that prior to that taking place, and upon
 15 being informed that it was imminent, that the family of
 16 Jermaine Baker sought to bring proceedings to prevent
 17 that from taking place?
 18 **A. Yes, I was.**
 19 Q. But that that was in the event unsuccessful?
 20 **A. That's correct.**
 21 THE CHAIRMAN: Can we have some dates about notification of
 22 retirement and notification of whatever he was told, if
 23 anything, before he retired?
 24 MS BLACKWELL: Certainly.
 25 THE CHAIRMAN: Thank you.

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1 MS BLACKWELL: We will obtain that information for you, sir.
 2 THE CHAIRMAN: Thank you.
 3 MS BLACKWELL: Once you had provided your recommendations
 4 to, was it Ms Butts?
 5 **A. It was at the time, yes.**
 6 Q. Thank you.
 7 As you have explained at the beginning of your
 8 evidence, the MPS were informed and they were and did
 9 take the opportunity of responding to that which they
 10 had been told?
 11 **A. Yes.**
 12 Q. What is the procedure whereby that takes place? How
 13 does that happen?
 14 **A. It sent a by letter form of the recommendations to the**
 15 **Metropolitan Police and then they will respond in letter**
 16 **form and it goes backwards and forwards.**
 17 Q. They are at that stage referred to as the AA, or the
 18 appropriate authority?
 19 **A. Yes, that's correct.**
 20 Q. Once they have made their representations, is there then
 21 a final decision made by the IOPC as to whether or not
 22 to direct that misconduct proceedings are commenced?
 23 **A. Yes, that's correct.**
 24 Q. In this case, was that person Sarah Green, the regional
 25 director of south-east?

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1 breaching his duties and responsibilities by
 2 inadequately setting out the full intelligence picture
 3 in FA2 (the application for authority for the deployment
 4 of armed officers authorisation)."
 5 She goes on:
 6 "The final report was submitted to the IPCC
 7 commissioner Cindy Butts in compliance with
 8 paragraph 23(1)(b) of schedule 3 of the PRA and Ms Butts
 9 made a determination to refer it to the DPP. She also
 10 sent a copy of the final report to the Metropolitan
 11 Police Service as the appropriate authority for it to
 12 determine whether any persons to whose conduct the
 13 investigation related had a case to answer in respect of
 14 misconduct/gross misconduct and what actions will be
 15 taken in respect of the matters in the report ..."
 16 She continues on the next page:
 17 "The DPP made a decision not to charge any police
 18 officers with any offences on 14 June 2017. That
 19 decision was challenged by Mr Baker's family, who
 20 exercised the victim's right of review. The AA provided
 21 its memorandum setting out its determinations that
 22 neither W80 or DCI Williams had a case to answer for
 23 misconduct or gross misconduct on 5 September 2017 (in
 24 compliance with paragraph 23(7) of schedule 3)."
 25 THE CHAIRMAN: AA?

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1 **A. Yes.**
 2 Q. In order to explain her understanding of the case and
 3 the reasoning behind her decision to direct misconduct
 4 proceedings to take place, I am going to ask that we
 5 look at the letter that she sent back to the MPS, which
 6 is at MPS3421, please.
 7 We can see that this was a letter directed to
 8 Detective Chief Inspector Andrew Taverner at the Empress
 9 State Building, and it was sent on 1 May 2018. She
 10 begins by setting out the chronology of what has taken
 11 place:
 12 "The Independent Police Complaints Commission
 13 conducted an independent investigation into the
 14 circumstances of Jermaine Baker's death, culminating in
 15 the final report dated 23 November 2016 prepared by
 16 operations manager Catherine Hall and operations team
 17 leader Liz Parsons, in compliance with paragraph 19 of
 18 schedule 3 of the Police Reform Act 2002. The
 19 investigator's opinions regarding conduct in that report
 20 were that (a) W80 had a case to answer for gross
 21 misconduct for using excessive force when fatally
 22 shooting Mr Baker, and (b) [we can see DCI Williams's
 23 name has been redacted and replaced with FE16, which was
 24 how he was referred to during the course of your
 25 investigation] had a case to answer for misconduct for

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1 MS BLACKWELL: That is the appropriate authority, who are
 2 the MPS.
 3 THE CHAIRMAN: Thank you.
 4 MS BLACKWELL: Thank you:
 5 "On 8 January 2018, the IPCC became the Independent
 6 Office for Police Conduct, the IOPC, and I was appointed
 7 as the director general's delegate in this matter and
 8 have (a) read the final report of the investigation, (b)
 9 read the AA's memorandum under paragraph 23(7) of the
 10 schedule 3 to the PRA and (c) made arrangements so that
 11 I am assured the final report accurately summarises the
 12 relevant evidence in the investigation.
 13 "On 19 March 2008 the DPP issued its decision
 14 regarding the VRR [victim's right to review] which was
 15 that no charges would be brought against any officer in
 16 relation to this matter.
 17 "By letter dated 19 March 2018, I recommended that
 18 officer W80 had a case to answer for gross misconduct
 19 for using excessive force due to his conduct in shooting
 20 Jermaine Baker and that disciplinary proceedings for
 21 gross misconduct should be brought against him for the
 22 reasons set out in that letter. As DCI Williams had
 23 retired and the former officer regulations did not apply
 24 to him, I made no determinations in respect of him."
 25 That confirms what we have just discussed, doesn't

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1 it, Ms Hall?
 2 **A. Yes.**
 3 Q. "By an undated letter received 19 April 2018 you, as AA,
 4 decided not to accept my recommendations in relation to
 5 W80. It now falls to me to decide whether to direct you
 6 to put into effect my recommendations."
 7 She goes on:
 8 "Paragraph 27(3) of schedule 3 to the PRA allows the
 9 IOPC to recommend to the AA, inter alia, that a person
 10 serving with the police has a case to answer for gross
 11 misconduct or misconduct or has no case to answer and
 12 that disciplinary proceedings in the form specified in
 13 the recommendation are brought against that person; or
 14 that disciplinary proceedings brought against that
 15 person are modified so as to deal with such aspects of
 16 the conduct as may be specified in the recommendation."
 17 THE CHAIRMAN: Can you pause there a moment, please?
 18 MS BLACKWELL: Yes.
 19 THE CHAIRMAN: Is it the words "serving with the police"
 20 that prevented the disciplinary proceedings against FE16
 21 going ahead after his resignation or is there any
 22 regulation which does not preclude the commencement and
 23 continuation of disciplinary proceedings against
 24 an officer who has resigned or retired in the
 25 circumstances in this case?"

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1 **attend, the hearing will --**
 2 THE CHAIRMAN: They didn't have to attend before, but in
 3 other words it doesn't bring the proceedings to an end,
 4 the mere fact of retirement?
 5 **A. No, not anymore.**
 6 MS BLACKWELL: Just to confirm, at the time with which we
 7 are concerned, that did not apply.
 8 **A. No. Yes.**
 9 Q. Thank you, I am going to go back to the letter, please,
 10 because it seems, sir, with your approval, that this
 11 a convenient way of setting out the history of what took
 12 place.
 13 THE CHAIRMAN: I am perfectly content for you to deal with
 14 it in this way.
 15 MS BLACKWELL: Thank you.
 16 THE CHAIRMAN: In due course I could perhaps have it in
 17 a hard copy.
 18 MS BLACKWELL: Certainly.
 19 I am going to return then to paragraph 10:
 20 "If after the IOPC has made such a recommendation,
 21 the AA rejects it, the IOPC may, pursuant to
 22 paragraph 27(4) of the schedule 3 to the PRA, direct the
 23 AA to give effect to the recommendation.
 24 "The IOPC has a discretion therefore whether to
 25 direct the AA to give effect to its recommendations."

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1 **A. At the time, sir, any officer that had retired, the**
 2 **disciplinary proceedings could not take place.**
 3 THE CHAIRMAN: Is it because of those words?
 4 MS BLACKWELL: I am afraid I don't know the answer to that,
 5 but we will find out.
 6 You will see, sir, at the end of paragraph 7, there
 7 is reference to the fact that the former officer
 8 regulations did not apply, and, as I was reading that,
 9 it occurred to me that that is something you may be
 10 interested in.
 11 THE CHAIRMAN: Well, I am interested in it, for this reason.
 12 Officers retire early, and very often, or not
 13 infrequently, seek employment in other but often
 14 connected areas. The question arises as to whether
 15 a retirement or resignation from the police should
 16 preclude the continuation of a procedure, the outcome of
 17 which might very well affect a potential employer.
 18 MS BLACKWELL: Yes.
 19 **A. Sir, if I could answer that --**
 20 THE CHAIRMAN: If you can, I would be grateful.
 21 **A. I will try.**
 22 **Under the new regulations that any officer that has**
 23 **retired where a case to answer is put forward for gross**
 24 **misconduct, they now must attend that hearing -- no,**
 25 **sorry, the hearing must go ahead, they don't have to**

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1 The question whether to exercise that discretion must be
 2 determined separate to the determination that there is
 3 a case to answer for gross misconduct or misconduct.
 4 Whether to exercise the discretion to make such
 5 a direction is a question which involves consideration
 6 of a number of factors, including, but not limited to,
 7 an assessment of where the public interest lies.
 8 "I have decided to direct you to put into effect my
 9 recommendations that disciplinary proceedings for gross
 10 misconduct should be brought against officer W80 for the
 11 reasons set out in this letter."
 12 She begins to deal with those reasons at
 13 paragraph 16, please:
 14 "I refer to the rationale previously provided in my
 15 recommendations letter, on the basis of which I remain
 16 of the view that a reasonable disciplinary tribunal
 17 could find that W80 has a case to answer for gross
 18 misconduct.
 19 "As set out above, notwithstanding that I consider
 20 a reasonable disciplinary tribunal could find that W80
 21 has a case to answer for gross misconduct, I separately
 22 must consider whether it is appropriate to direct that
 23 you give effect to my recommendations.
 24 "You have not put forward any representations
 25 regarding the balance of the public interest. However,

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1 I am of course aware of concerns expressed by the
 2 previous commissioner of the Metropolitan Police,
 3 Sir Bernard Hogan-Howe, regarding the negative impact of
 4 investigations into the use of force by firearms
 5 officers, as for example reported here [she quotes
 6 an article in the Guardian].
 7 "Set against this, however, there are very strong
 8 public interest arguments for proceedings to take place,
 9 based on the severity of the alleged conduct. In this
 10 case there was a loss of life as a result of the conduct
 11 for which there is a case to answer. The degree of harm
 12 is relevant to the severity of any sanctions that would
 13 be imposed and there is strong public interest in
 14 officers facing disciplinary proceedings where dismissal
 15 may be justified. Although I have accepted that
 16 excessive force was used because of a genuine, albeit
 17 unreasonable belief, the severity of the result is such
 18 that I believe public confidence in policing would be
 19 severely undermined if, despite there being a case to
 20 answer, there were no proceedings to determine whether
 21 the officer should be disciplined."
 22 I am just going to pause there, to remind everybody,
 23 sir, that although Ms Green is expressing her view in
 24 this letter, of course you will decide matters of
 25 afresh:

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1 decisions regarding the accountability of those involved
 2 are as transparent as possible and proceeding to
 3 a disciplinary hearing in order to preserve public
 4 confidence in the regulation of the police.
 5 "The DPP made a decision not to charge any police
 6 officers with any offences on 14 June 2017 ..."
 7 I am so sorry, I am reading back.
 8 THE CHAIRMAN: That is all right.
 9 MS BLACKWELL: She then goes on at paragraph 22:
 10 "In my view any failure to determine what if any
 11 breaches have been committed by the officer would strike
 12 at the very purpose of the police misconduct regime, in
 13 that it would circumvent the need to uphold high
 14 standards in policing and would damage public confidence
 15 in the reputation of the police service and the balance
 16 of public interest is in favour of proceeding to
 17 a disciplinary hearing."
 18 She then goes on to set out her determination.
 19 So, that letter would have been sent back to the
 20 MPS?
 21 **A. Yes.**
 22 Q. Can you now, please, bring the inquiry up to date as to
 23 what happened thereafter and the current position of
 24 proceedings?
 25 **A. W80 challenged the interpretation of the standards of**

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1 "This case involves the use of lethal force against
 2 an individual of mixed race. The perceived way in which
 3 individuals from a BAME background are treated by the
 4 police is a sensitive issue of great concern to the
 5 public and more particular the black and minority ethnic
 6 community. The IPCC's public confidence survey, last
 7 carried out in 2016, showed that there were clearly
 8 lower levels of confidence in the police complaints
 9 system amongst people from the black and minority ethnic
 10 communities. Though their confidence has risen in many
 11 areas, it remains significantly lower than the general
 12 population across a range of issues. Readiness to
 13 complain and trust in fair handling, the perception that
 14 there may be negative consequences of complaining,
 15 willingness to take complaints directly to the police
 16 and knowledge and understanding of the IPCC and its
 17 independence:
 18 "This a high-profile case which has attracted
 19 significant attention both nationally and
 20 internationally. Where there is objective evidence of
 21 harm to the reputation of the police service within
 22 a particular section of the public, that is also
 23 a matter that can be taken into account by
 24 a disciplinary panel in determining seriousness. There
 25 is a very strong public interest in ensuring that any

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1 **professional behaviour.**
 2 Q. Yes.
 3 **A. Which was ultimately upheld by the Court of Appeal, that**
 4 **the IOPC's direction was correct and -- but now W80 has**
 5 **sought permission to appeal to the Supreme Court.**
 6 **No decision has yet been made on that and we are**
 7 **awaiting a date of that hearing.**
 8 Q. Right, and for the sake of completeness, sir, can you
 9 confirm, please, Ms Hall, that the Court of Appeal held
 10 the IOPC was justified in concluding that it was open to
 11 a reasonable panel at a misconduct hearing to make
 12 a finding of misconduct if W80's honest but mistaken
 13 belief that his life was threatened was found to be
 14 unreasonable and the court held that that conclusion was
 15 soundly based in law on the proper and plain meaning of
 16 the 2012 regulations and the code and that the
 17 assessment of the disciplinary panel in misconduct or
 18 gross misconduct proceedings is not to be made by
 19 reference to any imported test relating to self defence?
 20 **A. Yes, that's right.**
 21 MS BLACKWELL: Thank you.
 22 Sir, that concludes my questioning. I know that
 23 both Ms Kaufmann and Mr Butt have specific and focused
 24 areas of questioning which they have sought permission
 25 to ask and our view is that those have a solid basis.

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1 THE CHAIRMAN: Very good.
 2 MS BLACKWELL: Firstly though, I should ask, do you, sir,
 3 have any questions?
 4 Questions from THE CHAIRMAN
 5 THE CHAIRMAN: I have just one matter that I want to raise.
 6 I have raised a couple of matters as we have gone along.
 7 You have already told Ms Blackwell that there were
 8 no recommendations for disciplinary proceedings to be
 9 taken against Detective Superintendent Turner.
 10 **A. Yes, that's correct, sir.**
 11 THE CHAIRMAN: Was that considered?
 12 **A. Throughout the course of the investigation, we assessed**
 13 **the actions of all officers involved in this but that**
 14 **was specifically considered following Chief**
 15 **Superintendent Hartley's report, as the expert into**
 16 **armed policing and the tactics used --**
 17 THE CHAIRMAN: Because he has not been isolated from
 18 criticism. What was the rationale that enabled you to
 19 conclude or led you to conclude that he ought not to
 20 face misconduct proceedings?
 21 **A. As I said, sir, that was based on Mr Hartley's report,**
 22 **that didn't seek out him for any specific failures and**
 23 **it was felt that -- this is again from recollection,**
 24 **that it was poor, maybe, but there were no specific**
 25 **conduct breaches.**

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1 THE CHAIRMAN: Before we have the questioning, do you want
 2 me to rise or shall we proceed straight to it?
 3 MS BLACKWELL: No, lets proceed straight to it. I am
 4 hopeful that we can conclude within the next 10 or 15
 5 minutes.
 6 I see nods from the back.
 7 THE CHAIRMAN: Who wants to go first.
 8 MS BLACKWELL: I am going to invite Ms Kaufmann to go first,
 9 please.
 10 THE CHAIRMAN: Yes, Ms Kaufmann.
 11 Questions from MS KAUFMANN
 12 MS KAUFMANN: Ms Hall, I would like just to start, if
 13 I might, with going back to the approach by the police
 14 to the IPCC to inform the family about Jermaine's death
 15 and the IPCC rightly refused to do that.
 16 I just want to clarify with you whether you ever
 17 came to learn that when the police did undertake that
 18 responsibility, the first person that they told was in
 19 fact Leanne, Jermaine's sister, and that they didn't
 20 inform Margaret, Jermaine's mother, or Tia, the mother
 21 of Jermaine's child?
 22 **A. I can't specifically recall without having access to all**
 23 **the logs at the time, but I do seem to recall there was**
 24 **a lot of discussion about where the family lived at the**
 25 **time, but I am sorry, I can't assist you specifically.**

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1 THE CHAIRMAN: I appreciate it is from recollection.
 2 Ms Blackwell, is it open to me to require this
 3 witness to look at the material that she won't have with
 4 her here, to let us know if there were any minutes or
 5 meetings at which the position of Detective
 6 Superintendent Turner was specifically discussed?
 7 MS BLACKWELL: Of course, sir. This your inquiry. However,
 8 I would simply reiterate what I have said during the
 9 course of my examination of Ms Hall, that whatever
 10 decision the IPCC, as they then were, came to following
 11 whatever --
 12 THE CHAIRMAN: It is my decision that matters?
 13 MS BLACKWELL: Yes, however their investigation was
 14 conducted, these are matters which must be viewed afresh
 15 and of course it is important that everybody following
 16 these proceedings understands that whilst the IPCC
 17 investigation is important in setting the scene and the
 18 background for your consideration, sir, it will not
 19 determine or pre-determine those matters which you must
 20 look into during the course of your inquiry.
 21 THE CHAIRMAN: Not at all, but if there is any obvious
 22 reason, other than the fact that it was poor but not
 23 that poor, to paraphrase what Ms Hall was saying, then
 24 it would help me to know. That was all.
 25 MS BLACKWELL: So be it.

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1 Q. We heard yesterday that Tia was herself informed by the
 2 IOPC, or the IPCC as it then was, and not by the police.
 3 I have just been asked to clarify, and Ms Blackwell
 4 has said this is okay to do so, so through you, I am
 5 going to clarify that what actually there happened --
 6 I don't know whether you know this or recall this -- is
 7 that Margaret, as I have just said, didn't come to learn
 8 through the police, she received a call and then she
 9 became very, very concerned to make sure that Tia learnt
 10 this as soon as possible.
 11 By this time, the IOPC was with her and they offered
 12 to drive around to Tia and inform her.
 13 Do you remember that?
 14 **A. Yes, I have been reminded of that during the break in my**
 15 **evidence, that I -- from my understanding, Leanne didn't**
 16 **have access to a vehicle and therefore, in order to**
 17 **assist the family, that the family liaison manager,**
 18 **Ms Brennan, went with Leanne to inform the rest of the**
 19 **family.**
 20 Q. Thank you.
 21 Can I turn then to daybooks and, sorry, this is
 22 something that has just come up.
 23 As I understand it, it wasn't the IPCC that reviewed
 24 daybooks, it was Constable Kinch who did so and --
 25 sorry, I will come back to that because I am going to

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1 have to get a reference to it.
 2 Could we move on to the identification of Jermaine.
 3 If you could just help us, because we are not yet
 4 entirely sure how this came to pass. We understand from
 5 what you have said and from the documents that he was
 6 identified from his tattoos.
 7 **A. Yes.**
 8 Q. And that was because of references to tattoos on the
 9 Police National Computer. Are you able to give us any
 10 more assistance as to how that would actually have
 11 happened?
 12 **A. Once again, I can't recall specifically but what has**
 13 **happened in previous -- and may have happened in this**
 14 **place, is that photographs, images are taken of the**
 15 **tattoos and then compared with the images on the**
 16 **national computer. As I said, I can't categorically say**
 17 **if that is what occurred on this case, but that is quite**
 18 **often the normal way.**
 19 Q. In those other cases, is it that you can scan the images
 20 and compare them and through a computer program, you can
 21 literally identify two --
 22 **A. This would be the police, and I am not an expert in the**
 23 **Police National Computer, how that is conducted, so I am**
 24 **really sorry. I can't assist.**
 25 Q. Thank you.

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1 **had been told and what had been discussed. In any DSI**
 2 **investigation, there is an obligation on the appropriate**
 3 **authority to retain all material that is about the**
 4 **matter under investigation and as well, obviously, this**
 5 **was always going to proceed to some kind of proceedings,**
 6 **whether that be the public inquiry where we now are, and**
 7 **there is an obligation on the appropriate authority to**
 8 **retain all material.**
 9 **The IPCC did not make specific requests for the**
 10 **material to be retained, because that should have been**
 11 **done.**
 12 Q. That is retention, but securing that material yourself,
 13 what steps did the IPCC take, firstly to identify what
 14 relevant material there was, because it could have been
 15 in all manner of different repositories? So before you
 16 can obtain what has been retained, you have to know what
 17 has been retained. What steps did you take to identify
 18 what relevant repositories existed?
 19 **A. We examined various -- various emails and as we became**
 20 **aware that they had been sent or they were discussing,**
 21 **specifically the chain of command for the FA forms, but**
 22 **we have -- we also have to be proportionate in what we**
 23 **are requesting and the lines of inquiry that are**
 24 **specific to what we are investigating.**
 25 Q. I think the answer is you looked for specific documents

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1 Can I just seek clarification on one more matter and
 2 that relates to the document MPS168 and the
 3 clarification you gave that Jermaine had not been
 4 a target, as in he had not been identified in advance.
 5 Can I just seek confirmation from you as to whether you
 6 ever found any evidence that Jermaine had been
 7 identified as a suspect before he was killed?
 8 **A. From my recollection of our investigation, we did not**
 9 **find any evidence at all that any of the occupants of**
 10 **the Audi had been known prior to that, for this**
 11 **Operation Ankaa.**
 12 Q. Can I move on now to the steps taken by the IOPC to
 13 secure electronic digital communications data relevant
 14 to the operation. You assisted Ms Blackwell earlier on
 15 in relation to the steps that were taken, specifically
 16 in relation to W80, to obtain such data.
 17 Of course we know that this operation had been going
 18 on for five weeks or so and there were multiple acts of
 19 communication on email, over telephone, over mobile
 20 phones and so forth. To what extent, if at all, did the
 21 IPCC seek to obtain that data, data relating to the
 22 entirety of the operation from its inception right
 23 through 11 December, when police officers were
 24 communicating over the radio and by phone and so forth?
 25 **A. The request regarding W80 was very specific to what he**

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1 but you didn't actually at any stage identify what
 2 repositories there were and seek from them an account of
 3 all the relevant material that they had in electronic
 4 form?
 5 **A. No, because, as the investigation progresses, and we did**
 6 **become aware, you would expect that material to still be**
 7 **there for examination at any time.**
 8 Q. Except that we know, don't we, that they have destroyed
 9 a lot of their electronic documents and records.
 10 **A. I believe they were destroyed relating to some officers**
 11 **after three years, which is the Metropolitan Police's**
 12 **policy.**
 13 Q. Can I ask you about whether or not there exists today --
 14 it certainly sounds as though there didn't then -- any
 15 policy within the IOPC about securing electronic data
 16 that is relevant to a particular operation or
 17 investigation of the IOPC?
 18 **A. I couldn't actually, you know, I would have to go back**
 19 **to the organisation and see whether there is any**
 20 **specific policy but, like I said, there is**
 21 **an obligation -- the minute a DSI starts, for the**
 22 **appropriate authority to retain all that material for**
 23 **examination, should that need arise.**
 24 Can I then move onto the question -- this was
 25 a question which Ms Blackwell -- I am so sorry.

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1 THE CHAIRMAN: That is all right.
 2 MS KAUFMANN: Sorry, sir.
 3 THE CHAIRMAN: That is all right.
 4 MS KAUFMANN: The intelligence that was received in relation
 5 to the operation was obviously of great importance, and
 6 you have talked about how you looked at the NCA
 7 repositories.
 8 When you looked at those NCA repositories, were you
 9 able to look at not only the raw intelligence that came
 10 in, but also the intelligence that was then disseminated
 11 from the NCA to the MPS?
 12 **A. Yes, that formed part of the investigates.**
 13 Q. That formed part of what you were able to see.
 14 Were you able to then build up a chronology of all
 15 the pieces of intelligence that came in and that were
 16 then passed on?
 17 **A. Yes. Well, the answer to that is we tried to build up**
 18 **a chronology but, due to some -- the lack of record**
 19 **keeping, the lack of briefings, recorded briefings, the**
 20 **building up an exact chronology of who was told what and**
 21 **when and how was difficult.**
 22 Q. Just finally, am I right in thinking that material that
 23 you got your hands on from the MPS, some of it was
 24 redacted?
 25 **A. Yes. Originally we had a few problems in that a lot of**

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1 MS KAUFMANN: Sorry, it is reviewed the daybooks.
 2 Yes, I think this is the point that we were making,
 3 that the daybooks were actually reviewed by DCI Kinch
 4 and not by the IPCC. And obtained by DCI Kinch?
 5 **A. I, from recollection, remember -- I think they were also**
 6 **reviewed by Ms Parsons, but I can clarify that at**
 7 **a later date.**
 8 THE CHAIRMAN: Documentary confirmation will suffice,
 9 I imagine.
 10 Unless there is any need for her to return,
 11 Ms Kaufmann?
 12 MS KAUFMANN: No.
 13 Thank you very much.
 14 MS BLACKWELL: Sir, finally, I hope, you are going to hear
 15 very briefly I think from Mr Butt, who has requested
 16 permission to ask questions on two topics.
 17 THE CHAIRMAN: Certainly.
 18 Questions from MR BUTT
 19 MR BUTT: Ms Hall, can I deal first of all, please, with
 20 intelligence, and I am going to ask you primarily about
 21 information you have told the inquiry in your
 22 29 October 2019 witness statement, if that helps.
 23 **A. Yes.**
 24 Q. In evidence earlier, you told --
 25 THE CHAIRMAN: Which statement, I am sorry?

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1 **the material had redactions in it. Ms Butts, who was**
 2 **the commission delegate on it, wrote to the MPS and**
 3 **said, basically, we were not happy with redacted**
 4 **materials and therefore, following that, we received**
 5 **originals rather than redacted copies.**
 6 **The redactions were quite often names and other bits**
 7 **of information and there was no -- from recollection,**
 8 **there was no suggestion they were trying to redact**
 9 **important information, it was just the process that they**
 10 **were going through, the MPS were going through, but that**
 11 **did stop, and we did get our hands on all the material**
 12 **unredacted. It just took a little time.**
 13 MS KAUFMANN: Thank you, Ms Hall.
 14 Thank you very much.
 15 Sorry, I was going to come back, wasn't I, and now
 16 I have completely forgotten to come back.
 17 THE CHAIRMAN: You were going to come back to your enquiry
 18 in relation to daybooks, I think.
 19 MS KAUFMANN: I was indeed, and I have the document. It is
 20 IPC502, page 0166.
 21 This is an email of 30 September 2016 from DCI
 22 Jason Tunn from SCO7 to Liz Parsons at the IPCC:
 23 "DCI Kinch has received the daybooks of DI Murray
 24 ..."
 25 THE CHAIRMAN: "Reviewed the daybooks".

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1 MR BUTT: I am so sorry, sir, 29 October 2019, which is
 2 IPC0000507.
 3 THE CHAIRMAN: Thank you.
 4 MR BUTT: Ms Hall, in evidence you told the chairman that in
 5 the days before 11 December 2015, information was
 6 received by the MPS that those planning the escape plot
 7 had tried to obtain a real firearm, and been unable to
 8 do so. You recall saying that, don't you?
 9 **A. Yes, that's correct.**
 10 Q. No need to have that on the screen, Mr Coates, thank you
 11 very much.
 12 That was a conclusion that you drew by drawing
 13 an inference from various different pieces of
 14 information that you received, wasn't it?
 15 **A. Yes.**
 16 Q. Because there was no direct evidence that you saw which
 17 showed that what had come into the NCA on this point had
 18 been passed on to the MPS officers apart from, for
 19 example, what is in the FA forms. Is that right?
 20 **A. Yes. I am doing this from recollection, again.**
 21 Q. Yes.
 22 If it helps you, what you say in your witness
 23 statement is that, as there were no auditable records,
 24 and because FE16 did not answer questions at interview,
 25 you had to make assumptions based upon what the NCA had

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1 and what you saw in, for example, the FA forms, yes?
 2 **A. That's correct.**
 3 Q. Would it be fair to say that, for a variety of reasons,
 4 it was a very difficult task for you to complete?
 5 **A. Yes. Absolutely.**
 6 Q. You also had to make assumptions, didn't you, when you
 7 were looking at this material, about who was involved in
 8 the escape plot?
 9 **A. I cannot recall making assumptions about that.**
 10 Q. In your witness statement, you say that those that you
 11 were in particular looking at as having been involved in
 12 the escape plot and trying to obtain firearms were
 13 a Mr Ozger and a Mr Ozcan Eren.
 14 It is at --
 15 THE CHAIRMAN: Subparagraph (b) at the foot of page 1.
 16 MR BUTT: Yes:
 17 "During the investigation I reviewed ..."
 18 **A. Sorry, yes.**
 19 **Yes.**
 20 Q. Those are the people that you were looking at who you
 21 saw intelligence relating to attempts to obtain
 22 a firearm before 11 December?
 23 **A. Yes, from recollection.**
 24 Q. Would you agree that those handling the intelligence
 25 would be in a better position to assist with these

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1 that they have breached a professional standard?
 2 **A. Yes, it is.**
 3 Q. No such notice was ever served on Chief Superintendent
 4 Turner, was it?
 5 **A. No.**
 6 Q. Would that be a fairer conclusion to draw than from
 7 memory trying to remember if it was poor, but not very
 8 poor?
 9 **A. Yes. There were no specific conduct or indications of**
 10 **conduct, or a breach of the duties and responsibilities**
 11 **or any other conduct.**
 12 Q. There was no indication that he had breached the
 13 standards of professional behaviour?
 14 **A. That's correct.**
 15 THE CHAIRMAN: Because if there had been, he would have been
 16 served with a notice?
 17 MR BUTT: Yes.
 18 Finally this, you were asked about the material you
 19 obtained in the course of the investigation. This was
 20 an independent investigation, wasn't it?
 21 **A. Yes, it was.**
 22 Q. Handled directly by the IOPC?
 23 **A. Yes.**
 24 Q. You could have requested any relevant material from the
 25 police to assist in your investigation?

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1 difficult questions?
 2 **A. For the inquiry?**
 3 Q. Yes.
 4 **A. Yes.**
 5 Q. I hope an easier question.
 6 Can you confirm -- I am dealing just with the
 7 imitation firearm intelligence that was received on
 8 10 December 2015 -- when that intelligence was received
 9 by the Metropolitan Police Service?
 10 **A. I can't --**
 11 Q. If I suggested to you it was on 11 December at around
 12 6.58 am, is that something you know or you simply don't
 13 know?
 14 **A. I can't categorically say.**
 15 Q. Please don't worry, all right.
 16 You were asked about Superintendent Turner --
 17 **A. Yes.**
 18 Q. -- and the chairman asked you about misconduct in
 19 relation to him.
 20 To be fair to that witness, if the IOPC believed
 21 there is an indication that someone has breached the
 22 standards of professional behaviour, then you must serve
 23 a notice of investigation upon them, mustn't you?
 24 **A. Yes, that's correct.**
 25 Q. It is a very low threshold when there is an indication

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1 **A. Yes, that's correct.**
 2 Q. And you were conducting a very broad, wide-ranging
 3 investigation into the circumstances that led to
 4 Jermaine Baker being shot on 11 December?
 5 **A. Yes.**
 6 MR BUTT: Thank you very much, those are my questions.
 7 MS BLACKWELL: Unless you have any other questions, sir?
 8 THE CHAIRMAN: No thank you.
 9 MS BLACKWELL: Then that completes Ms Hall's evidence.
 10 THE CHAIRMAN: Very good, thank you.
 11 MR SIMPSON: I do apologise, there are just one or two
 12 matters in relation to the appropriate regulations and,
 13 as I said, it is a complicated regime and I apologise
 14 for boring everybody with it, which have not been
 15 explained fully.
 16 I will just talk to counsel to the inquiry during
 17 the adjournment.
 18 THE CHAIRMAN: If there is anything you want to say, do you
 19 want to mention it, shall we say at 2.15 or Ms Blackwell
 20 can?
 21 MS BLACKWELL: Sir, we are going into closed session
 22 following the completion of Ms Hall's evidence.
 23 Perhaps we can deal with it by way of a formal
 24 admission, or I will certainly speak to my learned
 25 friend over the course of the adjournment and we will

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1	find a convenient way to provide the information to you.	1	22 June 2021)
2	THE CHAIRMAN: Very good. Thank you.	2	
3	MR SIMPSON: There was just one matter of evidence as well,	3	
4	where I think an inaccuracy has crept in.	4	
5	THE CHAIRMAN: Yes.	5	
6	MR SIMPSON: Again I will address Ms Blackwell, my learned	6	
7	friend, during the adjournment and we can deal with it	7	
8	that way.	8	
9	THE CHAIRMAN: Very good. Thank you very much.	9	
10	Ms Blackwell, we are going into closed.	10	
11	MS BLACKWELL: Yes.	11	
12	THE CHAIRMAN: And we are going into closed until Tuesday?	12	
13	MS BLACKWELL: We are.	13	
14	THE CHAIRMAN: If we were to resume at 2.15, would that be	14	
15	too soon or if we were to resume at 2.20, either way do	15	
16	you anticipate being able to complete the closed	16	
17	evidence which is earmarked for today?	17	
18	MS BLACKWELL: I don't know, I am afraid. I hope to, but --	18	
19	THE CHAIRMAN: You tell me when you would like to start.	19	
20	MS BLACKWELL: Let's start at 2.20, please.	20	
21	THE CHAIRMAN: Thank you very much.	21	
22	MS BLACKWELL: Thank you.	22	
23	(1.23 pm)	23	
24	(The inquiry continued in closed session)	24	
25	(The open session of the inquiry adjourned until Tuesday,	25	
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