

<p>1 Wednesday, 23 June 2021</p> <p>2 (10.00 am)</p> <p>3 THE CHAIRMAN: Good morning.</p> <p>4 MS BLACKWELL: Good morning, sir. We are going to begin</p> <p>5 today's business with the evidence of Gary Jopling.</p> <p>6 Could Mr Jopling be sworn, please.</p> <p>7 THE CHAIRMAN: Yes.</p> <p>8 MR GARY JOPLING (affirmed)</p> <p>9 Questions from MS BLACKWELL</p> <p>10 THE CHAIRMAN: Yes.</p> <p>11 MS BLACKWELL: Thank you.</p> <p>12 Will you give your name and rank to the court,</p> <p>13 please?</p> <p>14 A. Detective Constable Gary Jopling.</p> <p>15 Q. Thank you very much.</p> <p>16 Mr Jopling, I am going to ask you some questions on</p> <p>17 three topics today.</p> <p>18 The first relates to your role in Operation Ankaa.</p> <p>19 The second in relation to assistance that you can</p> <p>20 provide to the inquiry relating to mobile telephone</p> <p>21 attribution to certain subjects.</p> <p>22 Then I am going to ask you some additional questions</p> <p>23 related to the telephones that touch upon the contact</p> <p>24 that was made between subjects in Operation Ankaa and</p> <p>25 also some questions about the cell siting of the phones</p> <p style="text-align: center;">Page 1</p>	<p>1 at various times.</p> <p>2 May I begin by asking you to summarise, please, your</p> <p>3 involvement in Operation Ankaa before 11 December 2015.</p> <p>4 A. Before 11 December 2015, I was working on a separate</p> <p>5 operational team. I had very limited involvement in</p> <p>6 Operation Ankaa. I may have been deployed on</p> <p>7 surveillance as a surveillance officer, but I can't give</p> <p>8 any -- remember which deployments I may have been</p> <p>9 deployed on, but no involvement in the planning or</p> <p>10 anything to do with Operation Ankaa.</p> <p>11 Q. On 11 December, is it right that you attended the</p> <p>12 5.00 am briefing at Lincoln Road --</p> <p>13 A. Yes.</p> <p>14 Q. -- that was given by Detective Constable Dennett?</p> <p>15 A. Yes.</p> <p>16 Q. What were the arrangements for you to attend that</p> <p>17 briefing, when were you told that that would be part of</p> <p>18 your duty that day?</p> <p>19 A. We were told a few days before, during the planning of</p> <p>20 the operation.</p> <p>21 Q. Did you know in the lead up to the briefing meeting at</p> <p>22 5.00 am that day what you were getting involved in, what</p> <p>23 you were going to be asked to do, your role in the</p> <p>24 operation?</p> <p>25 A. Yes, I knew I was going to be deployed as a support</p> <p style="text-align: center;">Page 2</p>
<p>1 vehicle.</p> <p>2 Q. Can you confirm, please, that the 5.00 am briefing to</p> <p>3 which I have made reference was presented by Detective</p> <p>4 Constable Dennett?</p> <p>5 A. I believe so, yes.</p> <p>6 Q. Yes.</p> <p>7 Are you able to assist us in terms of the content of</p> <p>8 the briefing?</p> <p>9 A. I can't remember any specifics, but he gave a briefing</p> <p>10 of the basic intelligence and potential people involved.</p> <p>11 Q. How many were there?</p> <p>12 A. In the briefing?</p> <p>13 Q. Yes.</p> <p>14 A. The surveillance team, the other support officers and</p> <p>15 the firearms team.</p> <p>16 Q. Your role was going to be one of support to the</p> <p>17 surveillance team and possibly the arrest car -- the</p> <p>18 arrest team, if that is what in fact eventually took</p> <p>19 place?</p> <p>20 A. Yes, our role would have been to remain covert until</p> <p>21 called for by the commander.</p> <p>22 Q. In terms of surveillance then, and just remaining with</p> <p>23 that, if we may for a moment, was your sighting of</p> <p>24 Ozcan Eren in a vehicle, registration beginning GM15 at</p> <p>25 9.17 am that morning the first point at which Ozcan Eren</p> <p style="text-align: center;">Page 3</p>	<p>1 was sighted?</p> <p>2 A. That was the first time he was sighted, but that was not</p> <p>3 by me. That was by a member of the surveillance team.</p> <p>4 Q. Right. But you can confirm that that was the first</p> <p>5 sighting of him that day?</p> <p>6 A. Yes.</p> <p>7 Q. Was the vehicle in which Ozcan Eren was travelling at</p> <p>8 that time a vehicle that had been identified as relevant</p> <p>9 during the briefing that you were present at at 5.00 am</p> <p>10 that morning?</p> <p>11 A. From my memory, that was not a known vehicle, not on the</p> <p>12 briefing.</p> <p>13 Q. If that was not a pre-identified vehicle, how was it</p> <p>14 that you were able to identify him at 9.17 that morning?</p> <p>15 A. That was the surveillance officer, I understand they saw</p> <p>16 Ozcan Eren driving that vehicle --</p> <p>17 Q. Right.</p> <p>18 A. -- or parked in that vehicle.</p> <p>19 Q. So you were not together with that surveillance officer</p> <p>20 at the time?</p> <p>21 A. No.</p> <p>22 Q. But he was a member of your team?</p> <p>23 A. He wasn't a member of the support team, he was on</p> <p>24 surveillance -- he was a surveillance officer.</p> <p>25 Q. Was he somebody who had been present at the briefing</p> <p style="text-align: center;">Page 4</p>

<p>1 that you had attended at 5.00 am that morning?</p> <p>2 A. I believe he was in a separate briefing.</p> <p>3 Q. Right.</p> <p>4 THE CHAIRMAN: What was his name?</p> <p>5 A. [Redacted] or [Redacted].</p> <p>6 Q. In relation to this evidence, you are relaying what you</p> <p>7 know to have been the case from your general involvement</p> <p>8 in the operation?</p> <p>9 A. Yes.</p> <p>10 Q. Thank you.</p> <p>11 Sir, if we need to we will contact that officer and</p> <p>12 obtain his account.</p> <p>13 THE CHAIRMAN: Thank you.</p> <p>14 MS BLACKWELL: All right, I am going to now ask you some</p> <p>15 questions about your involvement post 11 December in</p> <p>16 relation to mobile telephones.</p> <p>17 You have made two statements, the first statement</p> <p>18 that you made was for the purposes of the IPCC</p> <p>19 investigation, is that right or was it for the criminal</p> <p>20 trial?</p> <p>21 A. It was for the criminal trial.</p> <p>22 Q. In any event, it was made on 5 February 2016. Can you</p> <p>23 confirm that date, please?</p> <p>24 THE CHAIRMAN: I have it, yes.</p> <p>25 MS BLACKWELL: Thank you.</p> <p style="text-align: center;">Page 5</p>	<p>1 You have also made an additional statement at the</p> <p>2 request of this inquiry that is dated 1 March of this</p> <p>3 year.</p> <p>4 A. That's correct, yes.</p> <p>5 Q. Thank you.</p> <p>6 The evidence that I am about to take you through has</p> <p>7 been compiled and analysed as a result of cell site data</p> <p>8 and mobile phone data obtained after the arrests on</p> <p>9 11 December, isn't it?</p> <p>10 A. Yes.</p> <p>11 Q. Yes.</p> <p>12 You are unable to help us this morning with any</p> <p>13 information that may have been available prior to that</p> <p>14 date, because it was only post the arrests that the data</p> <p>15 was obtained from the relevant companies?</p> <p>16 A. Yes.</p> <p>17 Q. Thank you.</p> <p>18 Let me begin then by taking you through the contents</p> <p>19 of the most recent statement that you have made in March</p> <p>20 of this year, and to ask you to assist the inquiry with</p> <p>21 the identification and attribution of mobile telephones</p> <p>22 relating to particular subjects.</p> <p>23 May we begin with Nathan Mason. You were able to</p> <p>24 attribute three SIM cards and mobile telephones to him;</p> <p>25 is that right?</p> <p style="text-align: center;">Page 6</p>
<p>1 A. Yes.</p> <p>2 Q. The first of those is relating to a SIM card ending in</p> <p>3 the numbers 392.</p> <p>4 A. Yes, that is the phone number, yes.</p> <p>5 Q. Right. Sorry, yes, it is not the number of the SIM</p> <p>6 card, it is the telephone number attached to the SIM</p> <p>7 card.</p> <p>8 THE CHAIRMAN: It is the last three numbers of the mobile</p> <p>9 phone number.</p> <p>10 A. Yes.</p> <p>11 MS BLACKWELL: Thank you.</p> <p>12 Are you able to assist the chair with how you were</p> <p>13 able to attribute that mobile telephone number to</p> <p>14 Nathan Mason?</p> <p>15 A. That device was seized in the vehicle, in the driver's</p> <p>16 footwell.</p> <p>17 Q. The mobile phone was a Nokia mobile telephone containing</p> <p>18 a Lyca SIM card?</p> <p>19 A. That's correct, yes.</p> <p>20 Q. Were you able to obtain a subscriber report for that</p> <p>21 number?</p> <p>22 A. Yes, I was.</p> <p>23 Q. Did it show you that the number was unregistered?</p> <p>24 A. Yes.</p> <p>25 Q. But that it had been activated at 07.14 hours on the</p> <p style="text-align: center;">Page 7</p>	<p>1 morning of 11 December?</p> <p>2 A. That's correct, yes.</p> <p>3 Q. I just want to pause for a moment to ask you about other</p> <p>4 mobile telephones that we will discuss, that were also</p> <p>5 turned on around about 7.00 on the morning of</p> <p>6 11 December, relating to other conspirators.</p> <p>7 A. Yes.</p> <p>8 Q. Is there a description of mobile telephones used by</p> <p>9 groups, criminal groups, for a specific purpose that are</p> <p>10 sometimes referred to as "dirty phones"?</p> <p>11 A. Yes, dirty phones or "burner phones".</p> <p>12 Q. Or burner phones. Can you explain what that means,</p> <p>13 please.</p> <p>14 A. They would be phones that are activated for a specific</p> <p>15 criminal purpose, with the objective of reducing the</p> <p>16 number of phone calls, being disposable at the end of</p> <p>17 the commission of the offence.</p> <p>18 Q. A telephone or rather a SIM card would be purchased in</p> <p>19 order to be used during the course of a criminal</p> <p>20 enterprise, with the intention that at the end of the</p> <p>21 criminal enterprise it would be disposed of and</p> <p>22 therefore the prospect of the police subsequently</p> <p>23 tracking it to a particular individual would be</p> <p>24 significantly reduced?</p> <p>25 A. That's correct, yes.</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

<p>1 THE CHAIRMAN: Although they are called dirty or burner 2 phones, they are really dirty or burner SIM cards, 3 aren't they? 4 MS BLACKWELL: They are. 5 A. Yes. 6 Q. In relation to this SIM card, did you discover that it 7 had been purchased from a shop in Edmonton called 8 Foretech Communication Systems? 9 A. Yes, that's correct. 10 Q. As we will see, were other SIM cards switched on at 11 a similar time on 11 December also purchased from that 12 shop? 13 A. They were, yes. 14 Q. Although, I should make clear that I don't think you 15 have been able to identify -- 16 MR BUTT: I am so sorry, can I speak to Ms Blackwell for 17 a moment? 18 THE CHAIRMAN: Of course you may. That is fine. 19 MR BUTT: Can you stop the live feed, please. I am very 20 sorry. 21 THE USHER: Can we stop the live feed, please. (Pause) 22 MS BLACKWELL: Mr Butt has informed me that the name given 23 by Mr Jopling -- I am so sorry, sir, Mr Butt has told me 24 that the name given by Mr Jopling of the surveillance 25 officer is a name that should have not been given in</p> <p style="text-align: center;">Page 9</p>	<p>1 open circumstances. It is certainly not his fault. 2 THE CHAIRMAN: Very well. 3 MS BLACKWELL: In the circumstances, I think we are within 4 the three-minute rule. 5 THE CHAIRMAN: We may not be, actually. 6 MR BUTT: We are, someone is watching it, sir. 7 THE CHAIRMAN: Very good. Thank you. I have the name, 8 anyway. 9 MS BLACKWELL: Right. I am gratefully assisted by 10 Ms McNeill, we should remind everybody in the room not 11 to publish that name in any way, shape or form. 12 THE CHAIRMAN: Very good, I will put a bracket around it. 13 MS BLACKWELL: Not at all. I think we are happy to continue 14 now. 15 THE USHER: Can we restart the feed, please, thank you. 16 THE CHAIRMAN: Thank you. 17 MS BLACKWELL: Mr Jopling, I was confirming with you that in 18 relation to the shop in Edmonton that we had identified, 19 your investigation revealed that other SIM cards that 20 had been switched on at the same time on the morning of 21 11 December 2015 were purchased from the same place? 22 A. That's correct, yes. 23 Q. Although I was going on to establish with you, that you 24 haven't been able to identify the date or the time when 25 they were purchased?</p> <p style="text-align: center;">Page 10</p>
<p>1 A. That's correct. 2 Q. Thank you. 3 Returning if we may, please, to the telephone number 4 ending in 392, were you able to perform some analysis of 5 the call data? 6 A. Yes. 7 Q. What did that reveal? 8 A. It was only in contact with the 932 number attributed to 9 Ozcan Eren. 10 THE CHAIRMAN: We are talking about the 392 number? 11 MS BLACKWELL: Yes, we are at paragraph 12, sir. 12 THE CHAIRMAN: Thank you. 13 MS BLACKWELL: The only contact that it had had since it was 14 switched on was with a number ending in 932. 15 A. Yes, and -- 16 Q. Attributed to Ozcan Eren? 17 A. And a number ending 475, which was unattributed. 18 Q. Right. 19 Were you also able to identify that Nathan Mason was 20 using the number that we have established whilst he was 21 sitting within the black Audi on the morning of 22 11 December? 23 A. That's correct. 24 Q. When you downloaded the handset in which that SIM card 25 had been discovered, did it show that that device had</p> <p style="text-align: center;">Page 11</p>	<p>1 only one contact saved, which was the letter J? 2 A. Yes. 3 Q. Was that contact revealed to be a number ending in 392? 4 A. Yes, it is the owning device's number, yes. 5 THE CHAIRMAN: Sorry, the number that was saved was actually 6 the number that was attributed to the SIM card? 7 A. Yes. Yes, sir. 8 THE CHAIRMAN: It saved its own number? 9 A. Yes. 10 THE CHAIRMAN: Yes. 11 MS BLACKWELL: But it had been saved under the letter J? 12 A. Yes. 13 Q. Finally, were you able to establish that cell site of 14 that number on 11 December was consistent with the 15 movement that the black Audi had made? 16 A. Yes. 17 Q. Thank you. 18 Were you able to attribute another number to 19 Nathan Mason ending in 915? 20 A. Yes. 21 Q. Can you tell us what your investigation revealed about 22 that number, please? 23 A. Analysis of that number showed it had been in contact 24 with a number ending 023, which was attributed to 25 Jermaine Baker.</p> <p style="text-align: center;">Page 12</p>

1 Q. Anything else?

2 **A. And the last -- the most common cell site was consistent**

3 **with Nathan Mason's address and the last usage was on**

4 **4 November 2015.**

5 Q. Did that coincide with the activation of the third

6 number that you were able to attribute to Nathan Mason?

7 **A. It did, yes.**

8 Q. So as the 915 usage stopped, the additional number, 791,

9 began?

10 **A. Yes.**

11 Q. What else were you able to establish about that third

12 number, please?

13 **A. The third number was a Nokia mobile and it was seized**

14 **from Nathan Mason's address, I think there is an error**

15 **in my statement there, it was actually on 11 December.**

16 Q. Right, thank you.

17 So that is following the arrests?

18 **A. Yes.**

19 Q. Anything else?

20 **A. That number, the call data on that number, again, showed**

21 **it had been in contact with the 023 Jermaine Baker**

22 **number.**

23 Q. Right. Were there also text messages relating to that

24 device between the 791 and the 023 number that is

25 attributed to Jermaine Baker?

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1 **A. There was call data which showed that the device was**

2 **active, but there was no calls or messages.**

3 Q. So it had been activated but not used?

4 **A. Yes.**

5 Q. For the sake of completeness, did your analysis also

6 confirm that the device had no contacts recorded in it?

7 **A. Yes.**

8 Q. Thank you.

9 What about the remaining number, the 023 number, how

10 was that attributed to Jermaine Baker, please?

11 **A. So that was a number that had been provided to some**

12 **staff at a hotel where Mr Baker had been staying in**

13 **October and November 2015.**

14 Q. Were you able to establish that that was also a number

15 that had been provided by Jermaine Baker to the police

16 on other occasions?

17 **A. Yes.**

18 Q. Was the last usage of that number made at 0534 hours on

19 the morning of 11 December?

20 **A. Yes.**

21 Q. Was that within the area of Tottenham Hotspur Stadium?

22 **A. It was, yes.**

23 Q. Were you able to analyse the contacts within that

24 telephone, or relating to that number?

25 **A. Yes, the phone had been seized from Mr Baker on**

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1 **A. That's correct, yes.**

2 Q. Was the last usage of that number a 45-second call to

3 Jermaine Baker's 023 number on the morning of

4 11 December at 05.34 hours?

5 **A. It was, yes.**

6 Q. Was the cell site of that number consistent with

7 remaining at Nathan Mason's home address?

8 **A. Yes.**

9 Q. Thank you.

10 I would like to ask you about the two mobile

11 telephone numbers that you have attributed to

12 Jermaine Baker. Let's begin with the number ending in

13 439, please.

14 How were you able to confirm the attribution?

15 **A. That was a black Nokia mobile phone that was seized from**

16 **Mr Baker's bag.**

17 Q. Were you able to obtain a subscriber report?

18 **A. Yes.**

19 Q. What did that tell you?

20 **A. It was an unregistered device or SIM card, and it was**

21 **activated on 11 December 2015.**

22 Q. Was this SIM card purchased from Foretech Communication

23 Systems in Edmonton?

24 **A. Yes.**

25 Q. Was there any call data relating to this number?

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1 **30 September, following an arrest.**

2 Q. Yes.

3 **A. That phone device had been downloaded and there was**

4 **several relevant contacts stored within.**

5 Q. What are those? I mean I am particularly interested in

6 the contacts saved as "Gee" and the contact saved

7 as "Notts"?

8 **A. Yes, there was contact called Gee, G-E-E, with a number**

9 **ending 583, and that number is attributed to**

10 **Gokay Sogucakli.**

11 Q. And Notts?

12 **A. And contact Notts, with a number ending 915, we knew**

13 **Notts was a suspected street name for Nathan Mason.**

14 Q. Indeed, as we have established, the 915 number, you were

15 able to attribute to him?

16 **A. Yes.**

17 Q. Thank you.

18 In relation to Gokay Sogucakli, were you able to

19 attribute a number to him ending in 126?

20 **A. Yes.**

21 Q. How did you do that?

22 **A. He had provided that number to police on 28 November,**

23 **reporting a theft.**

24 Q. Yes. Anything else?

25 **A. The device was unregistered, and activated on 28 --**

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<p>1 Q. 29 October I think, wasn't it?</p> <p>2 A. 29 October 2015 and the call data was obtained on that</p> <p>3 device also.</p> <p>4 Q. Yes.</p> <p>5 A. There was no contact with any other co-defendant or</p> <p>6 person suspected of involvement.</p> <p>7 Q. The last usage on that number was at about 06.11 hours</p> <p>8 on the morning of 11 December, wasn't it?</p> <p>9 A. Yes.</p> <p>10 Q. Yes.</p> <p>11 Did cell site analysis reveal that that device at</p> <p>12 that time had been in the vicinity of Bruce Grove</p> <p>13 station in Tottenham?</p> <p>14 A. Yes.</p> <p>15 Q. In relation to Izzet Eren, was a broken mobile handset</p> <p>16 and a Lyca SIM card discovered from inside an air vent</p> <p>17 in the cell of the Serco prisoner van containing</p> <p>18 Izzet Eren on the morning of 11 December?</p> <p>19 A. It was, yes.</p> <p>20 Q. Was that SIM card connected to a number ending 606?</p> <p>21 A. Yes.</p> <p>22 Q. Were you able to obtain a subscriber report for the SIM</p> <p>23 card?</p> <p>24 A. Yes, that showed that it was unregistered and activated</p> <p>25 on 9 October.</p> <p style="text-align: center;">Page 17</p>	<p>1 Q. So it had been activated on 9 October 2015?</p> <p>2 A. Yes.</p> <p>3 Q. That SIM card had been purchased from a company called</p> <p>4 CommSense Limited on Brooker Road in Waltham Abbey?</p> <p>5 A. Yes.</p> <p>6 Q. Top up information that you were able to obtain revealed</p> <p>7 that it was first topped up with £10 on 10 October 2015?</p> <p>8 A. Yes.</p> <p>9 Q. And that between 10 October and 11 December 2015, there</p> <p>10 were a further 14 top ups made to that SIM card?</p> <p>11 A. That's correct, yes.</p> <p>12 Q. Were you able to obtain call data for that number</p> <p>13 between 14 October and 11 December?</p> <p>14 A. Yes.</p> <p>15 Q. What did analysis of that call data reveal to you?</p> <p>16 A. That showed that he was in contact with a number ending</p> <p>17 897, 698 and 932, all attributed to Ozcan Eren.</p> <p>18 Q. So three numbers attributed to Ozcan Eren between the</p> <p>19 dates which we have set out?</p> <p>20 A. Yes.</p> <p>21 Q. Did your analysis also reveal that that number had been</p> <p>22 in contact with a number attributed to Izzet Eren's</p> <p>23 mother?</p> <p>24 A. Yes.</p> <p>25 Q. And also a number attributed to Phaedon Georgiou of</p> <p style="text-align: center;">Page 18</p>
<p>1 Joseph Hill Solicitors?</p> <p>2 A. Yes.</p> <p>3 Q. Did you discover that they were the solicitors who were</p> <p>4 representing Mr Eren at the time?</p> <p>5 A. Yes.</p> <p>6 Q. Did cell site of that number reveal to you that between</p> <p>7 14 October and 29 October, the SIM card was at a place</p> <p>8 consistent with Thameside prison?</p> <p>9 A. Yes.</p> <p>10 Q. And between 29 October and the morning of 11 December,</p> <p>11 did cell site analysis reveal that that SIM card was at</p> <p>12 a place consistent with the prison and then Wood Green</p> <p>13 Crown Court?</p> <p>14 A. Yes.</p> <p>15 Q. Further cell site analysis revealed to you that the SIM</p> <p>16 card had travelled, or rather the path of this SIM card</p> <p>17 was consistent with having travelled to Wood Green Crown</p> <p>18 Court and then to Wormwood Scrubs prison?</p> <p>19 A. Yes.</p> <p>20 Q. On 11 December, was it consistent with Izzet Eren</p> <p>21 travelling from Wormwood Scrubs to the court for the</p> <p>22 sentence hearing?</p> <p>23 A. It was, yes.</p> <p>24 Q. Thank you.</p> <p>25 Were you able to attribute four mobile telephones to</p> <p style="text-align: center;">Page 19</p>	<p>1 Ozcan Eren?</p> <p>2 A. I was, yes.</p> <p>3 Q. The first one ending in 897, what can you tell us about</p> <p>4 that?</p> <p>5 A. That was a number that was provided by Ozcan Eren during</p> <p>6 a damage-only vehicle collision on 30 November.</p> <p>7 Q. Did subscriber reports show you that it was registered</p> <p>8 to a Mr Hassan?</p> <p>9 A. Yes.</p> <p>10 Q. Were you able to analyse the call data and did that show</p> <p>11 you it had been in contact with the 606 number in</p> <p>12 possession of Izzet Eren?</p> <p>13 A. That's correct, yes.</p> <p>14 Q. Together with other people, including Cihan Eren and</p> <p>15 again Joseph Hill Solicitors?</p> <p>16 A. Yes.</p> <p>17 Q. Were you able to analyse ANPR data relating to that</p> <p>18 phone or that number?</p> <p>19 A. So the ANPR data would relate to Ozcan Eren's vehicles,</p> <p>20 the number plate reading.</p> <p>21 Q. Did that assist you at all in relation to the cell site</p> <p>22 analysis relating to the number?</p> <p>23 A. Yes, I conducted comparisons between his vehicle</p> <p>24 movements and the movements of the cell site, yes.</p> <p>25 Q. And they matched?</p> <p style="text-align: center;">Page 20</p>

1 **A. Yes.**
 2 Q. Just for the sake of completeness, please, can you
 3 explain what ANPR data is?
 4 **A. It is automated number plate recognition, it is the**
 5 **cameras on the side of the road that capture the number**
 6 **plates travelling through locations.**
 7 Q. So you were able to, using that together with the cell
 8 site analysis, form a match between the movements of the
 9 vehicle and the movements of the phone?
 10 **A. Yes.**
 11 Q. Thank you.
 12 The 698 number that you attributed to Ozcan Eren,
 13 was the subscriber report that you obtained able to show
 14 you that that number was unregistered and activated on
 15 29 October?
 16 **A. Yes.**
 17 Q. Had it been purchased from the Sarges Off Licence on
 18 Fore Street in Edmonton?
 19 **A. Yes.**
 20 Q. Were you able to analyse the call data relating to that
 21 number?
 22 **A. I was, yes.**
 23 Q. Had it been in contact with the 606 number attributed to
 24 Izzet Eren?
 25 **A. Yes.**

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1 Q. Did that reveal to you that it had been in contact with
 2 both the 606 number attributed to Izzet Eren and also
 3 the 475 number attributed to Nathan Mason?
 4 **A. Yes, so it was the 392 number --**
 5 THE CHAIRMAN: The 392 was Nathan Mason, and the 475 was the
 6 unattributed one.
 7 MS BLACKWELL: Sorry, yes.
 8 **A. The Izzet Eren phone, the Nathan Mason phone and the 475**
 9 **phone.**
 10 Q. All of those phones, including the one attributed to
 11 Ozcan Eren, were the ones that were switched on on the
 12 morning of 11 December?
 13 **A. Yes, bar Izzet Eren's prison phone, yes.**
 14 Q. Which he had for some time, yes.
 15 I am going to take you in a moment to some of the
 16 text messages relating to that number, but before we do,
 17 let's complete this list and deal with the final number
 18 that you attributed to Ozcan Eren, which was ending in
 19 389. Did the subscriber report show to you that that
 20 was unregistered and activated on 10 July 2015?
 21 **A. Yes.**
 22 Q. Were you able to analyse call data that was obtained
 23 between 13 October and 12 December 2015?
 24 **A. Yes.**
 25 Q. Had it been in contact with a number attributed to his

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1 Q. Was the cell site data relating to this number able to
 2 tell you that it had been located on several occasions
 3 to the Northumberland Park area?
 4 **A. Yes.**
 5 Q. And was this number last used shortly after midnight on
 6 11 December 2015?
 7 **A. That's correct, yes.**
 8 Q. Thank you.
 9 Finally --
 10 THE CHAIRMAN: That would be the early hours of the 11th?
 11 MS BLACKWELL: Yes.
 12 THE CHAIRMAN: Rather than the early hours of the 12th?
 13 MS BLACKWELL: Indeed, yes.
 14 THE CHAIRMAN: Yes.
 15 MS BLACKWELL: Thank you.
 16 The 932 number attributed to Ozcan Eren, now, was
 17 that, again, one of the SIM cards that had been
 18 purchased at Foretech Communications and only activated
 19 on the morning of 11 December?
 20 **A. It was, yes.**
 21 Q. In fact, your analysis revealed that it was activated at
 22 06.57 hours on that morning?
 23 **A. Yes.**
 24 Q. Did you analyse the call data?
 25 **A. Yes.**

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1 mother and to Joseph Hill Solicitors and also a number
 2 attributed to Cihan Eren?
 3 **A. Yes.**
 4 Q. Was the cell site of that number consistent with it
 5 having been attributed to Ozcan Eren?
 6 **A. It was, yes.**
 7 Q. Thank you.
 8 Finally, two mobile phones attributed to
 9 Eren Hasyer, the first ending in 356, what can you tell
 10 us about that, please?
 11 **A. That was a black Nokia mobile phone that was seized from**
 12 **the vehicle that Eren Hasyer was arrested in.**
 13 Q. Yes. Anything else?
 14 **A. That was also an unregistered phone activated on**
 15 **9 December 2015.**
 16 Q. Yes. Did analysis of the call data in relation to this
 17 number reveal that there had been no contact with any of
 18 the other individuals that we have mentioned so far
 19 today?
 20 **A. That's correct, yes.**
 21 Q. Did cell site of that number show that it was in the
 22 region of Tottenham Hotspur Stadium at about 3.00 am on
 23 11 December?
 24 **A. Yes.**
 25 Q. Finally, the 353 number attributed to Eren Hasyer, was

Page 24

<p>1 that seized from the vehicle in which he was travelling 2 on 11 December. 3 Was that a number unregistered but one that had been 4 activated on 2 September 2014? 5 A. Yes. 6 Q. Were you able to analyse the contents of various 7 WhatsApp conversations contained on that number? 8 A. I was, yes. 9 Q. Did that provide to you further confirmation that it 10 could be attributed to Eren Hasyer? 11 A. Yes. 12 Q. Thank you. 13 I want to ask you about the content of some of the 14 calls and texts that were revealed from your analysis of 15 the activity between some of the phones that we have 16 identified on the morning of 11 December. It may assist 17 you, Mr Jopling, to look back now at your other 18 statement and at page 11. 19 Sir, this is the statement made on 5 February 2016. 20 THE CHAIRMAN: I have it, thank you. 21 MS BLACKWELL: And it is page 11. 22 THE CHAIRMAN: Thank you. Yes. 23 MS BLACKWELL: Mr Jopling, I know that you have also been 24 provided with a copy of the case summary from the 25 criminal case.</p> <p style="text-align: center;">Page 25</p>	<p>1 A. Yes. 2 Q. Which also provides some assistance in relation to 3 setting the scene and the chronology of the use of these 4 phones. 5 We have established so far that the phones used 6 specifically for what was going to happen on 11 December 7 were all activated on or around the 7.00 am mark that 8 morning? 9 A. Yes. 10 Q. You are able to confirm that around that time 11 Nathan Mason is recorded from the probe, which was 12 placed in the Audi vehicle, as saying, "It is 7.00, we 13 need to turn the phones on now". 14 A. Yes. 15 Q. Then the probe picks up the sound of rustling, which may 16 be inferred as the sounds of packets opening and SIM 17 cards being placed in phones, et cetera. 18 A. Yes. 19 Q. The billing of the 392 phone, which is attributed to 20 Nathan Mason shows that at 7.00.23, so very soon after 21 its activation, the phone was only ever used to maintain 22 contact with Ozcan Eren's 932 phone and the unknown 475 23 phone? 24 A. Yes. 25 Q. As we have already established, the 439 Jermaine Baker</p> <p style="text-align: center;">Page 26</p>
<p>1 phone, whilst activated did not make any calls or 2 receive any calls or texts. 3 A. That's correct. 4 Q. And Ozcan Eren's 932 phone was only ever used to contact 5 Nathan Mason on the 392 phone, Izzet Eren on the 606 6 phone and the unknown 475 phone? 7 A. Yes. 8 Q. At 7.01, did the Ozcan Eren 932 phone make a 29-second 9 call to Nathan Mason's 392 phone? 10 A. Yes. 11 Q. At the same time, did the probe in the Audi pick up 12 conversation with somebody in the Audi saying: 13 "Who is that, Chico?" 14 And somebody else replying: 15 "No bruv, that is fucking O." 16 Someone saying: 17 "O? Which one? Ozzy man, not Omer, and Omer has 18 got nothing to do with this, crazy enough, he should 19 be." 20 Was that conversation with those present in the Audi 21 picked up at the time as Nathan Mason is receiving 22 a call on his phone? 23 A. Yes. 24 Q. At 07.11 hours did Nathan Mason's 392 phone make 25 a 1-minute-16-second call to the unknown 475 phone?</p> <p style="text-align: center;">Page 27</p>	<p>1 A. Yes. 2 Q. At that time, was there conversation recorded from the 3 probe that shows that at the end of the conversation 4 Nathan Mason said: 5 "O is phoning me, Oz is phoning me, bruv." 6 Somebody else in the vehicle, thought to be 7 Jermaine Baker, said: 8 "Just answer to Ozzy man." 9 A. Yes. 10 Q. At 7.13 hours, did Nathan Mason terminate the call with 11 the unknown phone and answer a call from Ozcan Eren? 12 A. Yes. 13 Q. Then at 7.23 am, and I am returning now to the case 14 summary, was it apparent that Ozcan Eren had been trying 15 to call Izzet Eren's 606 phone from his phone which had 16 been switched on that morning, his 932 phone, but there 17 was no connection? 18 A. Yes. 19 Q. Is it inferred from that that Izzet Eren's 606 phone may 20 well have been turned off to conceal any detection by 21 prison officers? 22 A. Yes, that's correct. 23 Q. Did the billing records suggest that Izzet Eren turned 24 on his handset containing the 606 number SIM card at 25 8.43 am?</p> <p style="text-align: center;">Page 28</p>

1 **A. Yes.**
 2 Q. Was the first communication a text message?
 3 **A. Yes.**
 4 Q. By virtue of the fact that there was no corresponding
 5 connection with Ozcan Eren, was it inferred from that
 6 that this was likely to have been a network message
 7 alerting him to the earlier missed calls?
 8 **A. Yes.**
 9 Q. And one minute later, at 8.45 am, was there a 25-second
 10 telephone call between Izzet Eren, his prison phone and
 11 Ozcan Eren's 932 phone?
 12 **A. Yes.**
 13 Q. Was that call followed up by a text message containing
 14 the following:
 15 "TX11 BXM".
 16 **A. Yes, that's correct.**
 17 Q. There needs to be a transposition of the letters but do
 18 you know and can you confirm that it bears a striking
 19 resemblance to the registration of the prison van which
 20 was in fact "BX11 TXM"?
 21 **A. Yes.**
 22 Q. Was that Izzet Eren telling Ozcan Eren, in the best way
 23 he could, the registration number of the van in which he
 24 was being loaded?
 25 **A. Yes.**

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1 **A. Yes.**
 2 Q. At the same time, did call data reveal to you that his
 3 932 number makes an attempt to contact Nathan Mason?
 4 **A. That's correct, yes.**
 5 Q. And two minutes later, at 09.19 hours, when surveillance
 6 officers saw the Audi in which Ozcan Eren was situated
 7 driving to the junction with Bounds Green Road, just
 8 after the prison van had passed the junction with
 9 Warwick Road on Bounds Green Road, was he sighted at
 10 that point using a mobile telephone?
 11 **A. He was, yes.**
 12 Q. Did the call data analysis reveal to you that at that
 13 time his 932 number was attempting to call Izzet Eren's
 14 606 number?
 15 **A. That's correct, yes.**
 16 Q. Did SMS data provided by the telephone company reveal to
 17 you that at 0921 hours, Ozcan Eren's phone sent a text
 18 message to Izzet Eren's 606 number in the following
 19 terms:
 20 "Fads all around you, get rid of your phone."
 21 **A. That's correct, yes.**
 22 Q. At 0925 hours, when surveillance officers saw Ozcan Eren
 23 driving the Audi vehicle into Durnsford Road from
 24 Wroxham Gardens using his mobile telephone, did
 25 subsequent data analysis reveal that at that time he was

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1 Q. At 8.48 am, did Ozcan Eren's 932 phone call
 2 Nathan Mason's 392 phone, and the conversation from that
 3 contact that was picked up by the recording device in
 4 the car revealed that Ozcan Eren was passing on to
 5 Nathan Mason the registration number of the prison van?
 6 **A. Yes.**
 7 Q. At 8.57 am, did Izzet Eren's number send a text message
 8 to Ozcan Eren's number with the following information:
 9 "First door on the right, I am in."
 10 **A. Yes.**
 11 Q. Did that correspond to the exact location of the cell in
 12 which Izzet Eren was placed -- I think it was cell
 13 number 6?
 14 **A. It did, yes.**
 15 Q. Thank you.
 16 Was that text immediately followed up by a call from
 17 Ozcan Eren to Nathan Mason in which that information,
 18 that is the positioning of Izzet Eren, was passed on to
 19 Nathan Mason?
 20 **A. Yes.**
 21 Q. As we established at the beginning of your evidence, at
 22 9.17 hours that morning, surveillance officers sighted
 23 Ozcan Eren sitting in an Audi with a registration
 24 beginning GM15, on Warwick Road and he was seen to be
 25 using his mobile telephone?

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1 receiving a phone call from the unknown 475 number?
 2 **A. Yes, that was one of my -- that was my observation that**
 3 **one.**
 4 Q. That was your observation?
 5 **A. Yes.**
 6 Q. Thank you.
 7 THE CHAIRMAN: Yes.
 8 MS BLACKWELL: Was there ever any contact between any of the
 9 mobile telephones attributed to Eren Hasyer and
 10 Jermaine Baker's phone? Or phones?
 11 **A. According to the call data the answer is no, but Eren**
 12 **Hasyer's phone was downloaded, it revealed there was**
 13 **contact, but after some expert analysis from the phone**
 14 **lab person, Dave McCormack, it was established that**
 15 **a phone call that had been recorded on 10 December**
 16 **wasn't actually made from Mr Baker to Mr Hasyer. And**
 17 **there was also two missed calls on 11 December, but it**
 18 **is unclear to me whether those calls were actually made**
 19 **or attempted or not.**
 20 THE CHAIRMAN: Sorry, I am not sure I understand that.
 21 MS BLACKWELL: I don't think I do, either.
 22 In relation to the information on 10 December, is
 23 there any evidence that there was contact between the
 24 two phone numbers?
 25 **A. According to the call data, no.**

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1 Q. Right. And on 11 December, I think you were saying that
 2 there is evidence of missed calls --
 3 **A. Not on the call data, again.**
 4 Q. Not on the call data. So is the effect of your evidence
 5 that there is nothing to connect those two telephones?
 6 **A. From my evidence from the call data, yes, that's**
 7 **correct.**
 8 MS BLACKWELL: Sir, that is all I intend to ask Mr Jopling
 9 but it would assist if we could have a short break so
 10 I can speak to core participants to see if there is
 11 anything else that arises as a result of my questions.
 12 THE CHAIRMAN: Do you want us to have our mid-morning break
 13 now?
 14 MS BLACKWELL: No, could I just ask you to rise for five
 15 minutes, please?
 16 THE CHAIRMAN: Yes. Thank you.
 17 (10.54 am)
 18 (A short adjournment)
 19 (11.17 am)
 20 THE CHAIRMAN: Mr Jopling is released.
 21 MS BLACKWELL: Thank you very much, sir.
 22 THE CHAIRMAN: Thank you.
 23 Yes.
 24 MS BLACKWELL: Sir, the witness in the witness box is
 25 Mr Steven Mayes. Could we please have him sworn.

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1 **A. Actually in December 2015 I was changing roles. I was**
 2 **there up until December 2015, but I went into a new**
 3 **role, I can't remember exactly what date in --**
 4 Q. Don't worry about that. Let's concentrate, if we may,
 5 on your role at the Prison Intelligence Unit. Before
 6 you moved from there, how long did you have a role
 7 relating to that unit?
 8 **A. I think I was there about 20 months in total, like I say**
 9 **I moved -- sorry, December 2015.**
 10 Q. About 20 months up until that time?
 11 **A. Correct.**
 12 Q. Where were you based?
 13 **A. Cobalt Square in London.**
 14 Q. Can you describe to us, please, the role or roles that
 15 you held during the 20 months that you worked in that
 16 unit?
 17 **A. Yes, I had management responsibilities for the London**
 18 **regional Prison Intelligence Unit, as it was called.**
 19 **Those responsibilities -- I had normal line manager**
 20 **responsibilities for the staff under me. From memory,**
 21 **I think we had -- in London there are eight or nine**
 22 **prisons and we usually had a prison intelligence -- a**
 23 **police intelligence officer in each prison, so I had**
 24 **responsibility for those officers and we had some**
 25 **administration staff as well, about six or seven**

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1 MR STEVEN MAYES (sworn)
 2 Questions from MS BLACKWELL
 3 MS BLACKWELL: Thank you very much, please sit down.
 4 THE CHAIRMAN: Yes.
 5 MS BLACKWELL: Is your full name Steven Mayes?
 6 **A. Steven Gary Mayes.**
 7 Q. Steven Gary Mayes, thank you.
 8 In December 2015, were you a detective inspector
 9 with the Metropolitan Police?
 10 **A. I was, yes.**
 11 Q. You are now retired?
 12 **A. That's correct, yes.**
 13 Q. Thank you.
 14 I would like to ask you, please, about your role in
 15 the London regional Prison Intelligence Unit, which
 16 I think is where you were based in December 2015.
 17 THE CHAIRMAN: Just a moment, please.
 18 MS BLACKWELL: Sir, do you have the papers, they should be
 19 towards the back of your bundle?
 20 THE CHAIRMAN: I thought I had them before. I have now,
 21 yes.
 22 MS BLACKWELL: Thank you.
 23 THE CHAIRMAN: Thank you.
 24 **A. Shall I go on?**
 25 MS BLACKWELL: Yes, please.

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1 **officers.**
 2 Q. Right.
 3 **A. And analysts, I should say as well.**
 4 Q. When you say some of your staff were based in particular
 5 prisons, were they physically based in the prisons or
 6 did they work from your office at Cobalt Square?
 7 **A. The vast majority of the time they were based in the**
 8 **prisons.**
 9 Q. What was the purpose of the unit?
 10 **A. To support the sharing of intelligence across the London**
 11 **prison estate, both ways really, between the police and**
 12 **the prison service.**
 13 Q. Right, so an officer working within your unit would be
 14 responsible for providing information to the prisons and
 15 also collecting information from the prisons?
 16 **A. In essence, yes, they all had slightly different**
 17 **versions of that, but, yes, that is what the**
 18 **responsibilities were, yes.**
 19 Q. Right. Having established those general aspects of your
 20 role, I would like to turn to ask you about Operation
 21 Ankaa specifically, and your involvement in receiving
 22 information and providing information about the proposed
 23 prison breakout on behalf of Izzet Eren. I know that
 24 you have provided a witness statement in relation to
 25 these matters that is dated 18 April 2016.

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<p>1 A. Yes, that's correct.</p> <p>2 Q. Was that statement provided for the purposes of the IPCC</p> <p>3 inquiry?</p> <p>4 A. I believe it was, yes.</p> <p>5 Q. Thank you.</p> <p>6 On Friday, 30 October 2015, were you on duty?</p> <p>7 A. Yes, I was.</p> <p>8 Q. At that time, was one of your roles to ensure that</p> <p>9 intelligence was shared appropriately between particular</p> <p>10 prisons and the law enforcement agencies of London?</p> <p>11 A. Yes, that's correct.</p> <p>12 Q. What happened in the late afternoon that day?</p> <p>13 A. So I had an officer who was on the call desk, as we call</p> <p>14 it, so that's one of the administration roles in the</p> <p>15 office, DC Rob Farley, he told me that a DC, Andy</p> <p>16 Sparks, from one of the serious and organised crime</p> <p>17 groups was on the telephone.</p> <p>18 Q. Did you know Mr Sparks, had you met him before?</p> <p>19 A. No.</p> <p>20 Q. You didn't know anything about him?</p> <p>21 A. No, I didn't, no.</p> <p>22 Q. He was on the telephone wanting to speak to you?</p> <p>23 A. Yes.</p> <p>24 Q. Did you take the call?</p> <p>25 A. Yes, I did.</p> <p style="text-align: center;">Page 37</p>	<p>1 Q. What did Mr Sparks tell you?</p> <p>2 A. He mentioned that a prisoner, Izzet Eren -- excuse me if</p> <p>3 I got the pronunciation wrong -- was being transferred</p> <p>4 to Wormwood Scrubs prison and his unit were concerned</p> <p>5 that he may attempt to escape from custody whilst in</p> <p>6 transit.</p> <p>7 Q. Did you make a note of the telephone call?</p> <p>8 A. I can't recall doing so, but there was further actions</p> <p>9 that came from that telephone call.</p> <p>10 Q. All right.</p> <p>11 Was Wormwood Scrubs prison one of the prisons that</p> <p>12 you had responsibility for?</p> <p>13 A. Yes, it was.</p> <p>14 Q. As a result of that information provided to you by</p> <p>15 Mr Sparks, did you ask him to create an intelligence</p> <p>16 record on the MPS intelligence database?</p> <p>17 A. That's correct, yes.</p> <p>18 Q. Can you explain to us what that database is, what it is</p> <p>19 called and what it does?</p> <p>20 A. Okay, so CRIMINT, I think it still exists in the</p> <p>21 Metropolitan Police, is the general intelligence</p> <p>22 database where we capture intelligence of any form</p> <p>23 across the MPS, across the Metropolitan Police.</p> <p>24 Q. Are you aware that that is precisely what he did, that</p> <p>25 he did create a CRIMINT report?</p> <p style="text-align: center;">Page 38</p>
<p>1 A. Yes, I am. Actually, I am not too sure it was he who</p> <p>2 created it, but somebody created it on his behalf.</p> <p>3 Q. On his behalf.</p> <p>4 Sir, if you remember, we looked at this CRIMINT</p> <p>5 report yesterday, it was the one that bears the letter B</p> <p>6 and the numbers 2, 5 in terms of its reliability.</p> <p>7 THE CHAIRMAN: Yes.</p> <p>8 One was created for this? So this appears, does it</p> <p>9 not, to be a different piece of intelligence, either</p> <p>10 from the 11 December plan or the 29 October plan?</p> <p>11 MS BLACKWELL: Yes. I think the evidence from Mr Sparks was</p> <p>12 that at the time that he received this information and</p> <p>13 passed it on to Mr Murray --</p> <p>14 THE CHAIRMAN: This is separate. This seems to be -- unless</p> <p>15 I am wrong, this seems to be fears about an escape</p> <p>16 whilst in transit from Thameside -- not Thameside, is it</p> <p>17 Thamesmead --</p> <p>18 MS BLACKWELL: Thameside.</p> <p>19 THE CHAIRMAN: Thameside, right, to the Scrubs on the 30th,</p> <p>20 whereas the original escape that had not gone ahead was</p> <p>21 on the 29th.</p> <p>22 MS BLACKWELL: That was on the 29th, yes.</p> <p>23 This, if you remember, sir, relates to information</p> <p>24 that was passed by Mr Sparks to Mr Murray, who gave</p> <p>25 evidence yesterday, on 30 October and Mr Murray's</p> <p style="text-align: center;">Page 39</p>	<p>1 evidence was that at that time he had not been aware of</p> <p>2 the previous aborted attempt on the day before.</p> <p>3 So this relates to information about the future</p> <p>4 possibility of an escape, rather than what had happened</p> <p>5 the day before.</p> <p>6 THE CHAIRMAN: I don't know that it relates to -- as I say,</p> <p>7 unless I am -- unless I have it wrong, and I promise to</p> <p>8 be quiet after I have made this point or sought to</p> <p>9 clarify it, we have the aborted escape plan for the</p> <p>10 29th.</p> <p>11 MS BLACKWELL: Yes.</p> <p>12 THE CHAIRMAN: We have the escape plan for the 11th, which</p> <p>13 ended in such tragic consequences.</p> <p>14 MS BLACKWELL: Yes.</p> <p>15 THE CHAIRMAN: But we now have a third escape fear, if not</p> <p>16 plan.</p> <p>17 MS BLACKWELL: I am not sure that that is right, sir.</p> <p>18 THE CHAIRMAN: Because this seems to be talking about fear</p> <p>19 of an escape whilst en route between two prisons.</p> <p>20 MS BLACKWELL: Is that what you were told?</p> <p>21 A. From what I recall, when I got that phone call on the</p> <p>22 Friday and spoke to DC Sparks, the concern was that</p> <p>23 there was a plan to facilitate a his escape from prison,</p> <p>24 whilst in transit. Is how I remember it.</p> <p>25 Q. Right, so from prison whilst in transit.</p> <p style="text-align: center;">Page 40</p>

1 To the prison or from the prison or was that not
 2 identified?
 3 **A. To escape from prison. I don't want to make**
 4 **an assumption -- whether it was -- it certainly was not**
 5 **on the way to prison, that I could recall. It was when**
 6 **he was going to any potential court cases or anything in**
 7 **the future or hospital appointments, et cetera.**
 8 Q. Let me establish this with you. At the time that you
 9 received the call, did you become aware that Izzet Eren
 10 was at Wormwood Scrubs prison?
 11 **A. From memory, yes. Yes.**
 12 Q. Right. So was your understanding of what was being said
 13 to you during this telephone conversation that the plan
 14 of which Mr Sparks had become aware, was that Izzet Eren
 15 would escape from prison or on the way --
 16 **A. In the future, from that point onwards, yes.**
 17 THE CHAIRMAN: Then the statement is wrong. Because the
 18 statement says:
 19 "I spoke to DC Sparks, who informed that a prisoner
 20 was being transferred to Wormwood Scrubs ..."
 21 MS BLACKWELL: Yes.
 22 THE CHAIRMAN: "... and his unit had concerns that he may
 23 attempt to escape from custody while in transit."
 24 So that cannot be right.
 25 MS BLACKWELL: That is right.

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1 from custody whilst in transit."
 2 So, in fact, sir, that is not particularly clear in
 3 itself.
 4 THE CHAIRMAN: No, it is not.
 5 MS BLACKWELL: The evaluation which I was referring you to,
 6 sir, is on the left hand page, at B, 2, 5.
 7 THE CHAIRMAN: Yes, it is the standard formula.
 8 MS BLACKWELL: It is.
 9 Thank you. Can we take that from the screen.
 10 Given the potential risk associated with any escape,
 11 whether it be whilst at the prison or whilst in transit
 12 from the prison to somewhere else, did you speak to
 13 anybody about the information that you had received?
 14 **A. Yes, I did. I spoke to Pete Nichols in Wormwood Scrubs.**
 15 Q. Is that somebody that you were familiar with?
 16 **A. It was, yes.**
 17 Q. Yes. What was his position at the time?
 18 **A. I knew him as a prison governor. In fact, a lot of**
 19 **people in prisons were called prison governors, so**
 20 **I didn't really know the rank. I knew Pete was probably**
 21 **sort of second or third in charge and he had**
 22 **an oversight of the offender management intelligence**
 23 **unit of the workings of the prison, and he was someone**
 24 **at my level I would liaise with.**
 25 Q. Right, so you had liaised with him before --

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1 In fact I think it may be a difficulty with the
 2 wording, Mr Mayes, of what appears in your statement, do
 3 you see?
 4 **A. Yes.**
 5 THE CHAIRMAN: I think it needs to be clarified. We will
 6 proceed on the assumption that the statement is wrong,
 7 that there wasn't a third escape plan or fear.
 8 MS BLACKWELL: Yes.
 9 THE CHAIRMAN: But that needs to be checked.
 10 MS BLACKWELL: It will be checked, sir.
 11 THE CHAIRMAN: Sorry to have interrupted you.
 12 MS BLACKWELL: Let's have a look, please, at the report that
 13 was logged on the MPS intelligence database, the CRIMINT
 14 report. Mr Coates, could we look at MPS368, please.
 15 Could we put this and the next page side by side.
 16 Do you recognise this, Mr Mayes, as a CRIMINT report?
 17 THE CHAIRMAN: There we are.
 18 MS BLACKWELL: Thank you.
 19 Mr Mayes, do you recognise this as a CRIMINT report?
 20 **A. Yes, it has been a long time, but yes, I do, yes.**
 21 Q. Thank you.
 22 Let's look first of all at the page on the
 23 right-hand side. The information which was recorded is
 24 this:
 25 "Intelligence indicates that Izzet Eren will escape

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1 **A. Yes, I had.**
 2 Q. -- on other matters?
 3 **A. Definitely, yes.**
 4 Q. If I were to describe him as a security manager, would
 5 that fit the bill for what -- part of his duties?
 6 **A. Yes. Yes.**
 7 Q. Thank you.
 8 Did you tell him about the conversation you had had
 9 with Mr Sparks?
 10 **A. I believe I did, yes. Well I told him about the**
 11 **intelligence, yes.**
 12 Q. What else, if anything, did you do?
 13 **A. I requested that the intelligence be transferred onto**
 14 **the Mercury system.**
 15 Q. Yes. Can you explain what the Mercury system is,
 16 please.
 17 **A. So the Metropolitan Police have a CRIMINT system, the**
 18 **same software, the prison service -- I don't know**
 19 **whether they still use it, but it is called -- it is the**
 20 **same software, but they call it Mercury. So the police**
 21 **call it CRIMINT, the prison service, certainly in**
 22 **London, I think nationally but I can't remember, used**
 23 **Mercury. So it is a similar software.**
 24 **So we had the police -- the prison intelligence**
 25 **officers, who were police officers embedded within the**

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<p>1 prison that I had responsibility for, had the 2 responsibility for ... one of their responsibilities and 3 roles was transferring intelligence both ways really, 4 from the CRIMINT onto the Mercury system -- 5 Q. And back again? 6 A. -- and back again, yes. 7 Q. Yes. Right. 8 So you ensured that that was logged? 9 A. I did, yes. I don't believe he was on duty at the time, 10 but I covered it in an email asking him to do it as soon 11 as possible. 12 Q. In your mind, Mr Mayes, was there any need to make any 13 other record of the conversation that you had had with 14 Mr Sparks? Or were you content that the CRIMINT log 15 that you had invited Mr Sparks to make and the 16 conversation that you had had with Mr Nichols, and the 17 logging of it on the Mercury system, was sufficient? 18 A. Yes, it was -- I think it was 4.30 on a Friday, and 19 obviously a lot of people working in administration are 20 rather on sort of 9 to 5 roles. 21 I felt that that piece of intelligence was managed 22 as best as it could at that particular point. I had 23 shared it with Pete, who had responsibility for the 24 prisoner in his prison. I believe we had a conversation 25 that if anything, if there were any concerns over the</p> <p style="text-align: center;">Page 45</p>	<p>1 weekend, then if Pete had concerns he would call me and 2 vice versa, and I obviously had contact with the 3 operational team, Andy Sparks, if -- so there was 4 a three-way communication that was accepted that if 5 anything occurred over the weekend, then we could 6 communicate. 7 Q. How would you intend to communicate, by mobile telephone 8 or email or both? 9 A. Yes, no, it would have been by mobile telephone. 10 Q. You had each other's contact details? 11 A. As far as I can recollect, yes. 12 Q. All right. 13 A. I remember Pete telling me he was actually working that 14 weekend, so he was -- yes, that was fine. 15 Q. Could we look, please, at some of the email contact that 16 you had in relation to these matters. Mr Coates, please 17 could we display MPS2163. 18 Thank you. 19 If we look at the bottom part of that page, please, 20 we can see that at 16.28 on 30 October you are sending 21 an email to Mr Sparks in the following terms: 22 "Andy, Prison governor Pete Nichols aware. Will 23 manage the risk without the need to escalate any 24 additional security (he understands the need to do so, 25 could compromise our own duty of care). He is working</p> <p style="text-align: center;">Page 46</p>
<p>1 the weekend. Prisoner was recently transferred to 2 Scrubs from Thameside prison. He is not shown as having 3 any hospital appointments. Any issues at weekend, he 4 will call me and I will call you. Regards, Steve." 5 THE CHAIRMAN: I think that answers the question that 6 I raised before. His statement is wrong. 7 MS BLACKWELL: Yes. 8 THE CHAIRMAN: This was not any intelligence about a plan to 9 escape whilst en route from Thameside to Wormwood 10 Scrubs, it was when en route from Wormwood Scrubs -- 11 MS BLACKWELL: At some point in the future. 12 THE CHAIRMAN: -- at some point in the future. 13 MS BLACKWELL: Yes, sir. 14 THE CHAIRMAN: Unless anybody otherwise, I am going to 15 assume that that is the case and that it doesn't need 16 any further clarification. 17 MS BLACKWELL: Thank you. 18 THE CHAIRMAN: Thank you. 19 MS BLACKWELL: I would like to ask you, please, Mr Mayes, 20 about the purpose of the first sentence that is recorded 21 in this email, and what lies behind it. 22 What did you mean when you wrote to Mr Sparks: 23 "Pete Nichols will manage the risk without the need 24 to escalate any additional security." 25 A. I think -- so Andy worked on the operational side and --</p> <p style="text-align: center;">Page 47</p>	<p>1 Q. What does that mean? 2 A. He was on the operational team that had been obviously 3 targeting -- 4 Q. Izzet Eren? 5 A. Mr -- yes, Izzet Eren and his associates. And sharing 6 the information, I think the concern was that where the 7 source of that information could potentially be 8 compromised if it was shared with too many people or 9 things were done which might suggest to that particular 10 prisoner that we were aware of something. 11 Q. So anything said or done that would alert him to the 12 fact that there was an operation afoot? 13 A. That's correct, yes. 14 Q. Does it follow, Mr Mayes, that the need to keep this 15 information confidential is something that was discussed 16 between you and Mr Sparks? 17 A. I am fairly sure that Mr Sparks made it clear that the 18 intelligence was highly sensitive and, yes, the less 19 people knew, the better. I was obviously comfortable 20 sharing that with Pete, and Pete understand -- 21 understood the concerns. 22 Q. Did you share that confidentiality concern with 23 Mr Nichols? 24 A. Yes, I did, yes. 25 Q. This email suggests that is certainly what you did do.</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

1 **A. Yes.**
 2 Q. Are you able now to remember precisely what was said to
 3 you by Mr Sparks about the sharing of this information?
 4 **A. I can't recall the exact conversation.**
 5 Q. All right.
 6 I would like to ask you about this, please. The
 7 part of the first sentence that is in parenthesis:
 8 "He understands the need to do so ..."
 9 That is a reference to Mr Nichols understanding the
 10 need to keep the information confidential, is it?
 11 **A. Yes.**
 12 Q. Yes:
 13 "... could compromise our own duty of care."
 14 What does that mean?
 15 **A. The fact -- I am not too sure how much I can say,**
 16 **really. If it is confidential information, then you are**
 17 **potentially compromising [Redacted].**
 18 **I am not too sure I can expand on that.**
 19 Q. Right.
 20 Sir, can we cut the feed, please.
 21 THE CHAIRMAN: Yes.
 22 THE USHER: The feed has been cut.
 23 MS BLACKWELL: Thank you. (Pause)
 24 It is being suggested, sir, that we go into closed
 25 session in order to discuss the matter which has just

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1 Mr Nichols?
 2 **A. Yes, that's correct.**
 3 Q. But that at no time during your conversation with
 4 Mr Sparks did you become aware of the source of the
 5 information that he was providing to you?
 6 **A. That's correct.**
 7 Q. I would just like to take you to one additional email,
 8 if I may. It is, please, Mr Coates, at HMP7. Thank
 9 you.
 10 We can see that, shortly after the email that you
 11 had sent to Mr Sparks, you sent another email to certain
 12 individuals within the MPS in the following terms.
 13 I think in fact this was sent to Mr Nichols with others
 14 copied in.
 15 Pete, as discussed, please be mindful that any overt
 16 upgrade to security regarding the below intel within the
 17 prison may compromise duty of care to our own source."
 18 Then you repeat the content of what we have now seen
 19 was recorded on the CRIMINT report.
 20 I would only like to ask you about one aspect of
 21 this email, and it is this: to what were you referring
 22 when us used the words "any overt upgrade to security"?
 23 Can I suggest something to you, Mr Mayes, was that
 24 an indication that there should not be any raising of
 25 the category status of Mr Eren?

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1 arisen and I have to say that that sounds sensible to
 2 me.
 3 THE CHAIRMAN: Yes, very good.
 4 MS BLACKWELL: Sorry to disrupt this morning's proceedings.
 5 THE CHAIRMAN: I am sure it will not take very long.
 6 MS BLACKWELL: No, it shouldn't do.
 7 THE CHAIRMAN: How long is it thought this will take,
 8 Mr Butt?
 9 MR BUTT: It will not take long at all, sir. It will take
 10 less than five minutes.
 11 (11.41 am)
 12 (The inquiry continued in closed session)
 13 (12.05 pm)
 14 THE CHAIRMAN: We are ready to go.
 15 MS BLACKWELL: Thank you, sir. For anyone watching the live
 16 feed, we have been able to resume, having investigated
 17 the technical issue that we had satisfactorily.
 18 THE CHAIRMAN: Thank you.
 19 MS BLACKWELL: Mr Mayes, I was asking you about an email
 20 which you had sent to Mr Sparks, following the
 21 conversation that you had with him and we had
 22 established that you had become aware of the need to
 23 keep the information provided to you confidential?
 24 **A. That's correct, yes.**
 25 Q. Yes. A need which you in turn had passed on to

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1 **A. Not necessarily the category but concerns -- if anything**
 2 **was immediately done then there could be a compromise.**
 3 Q. Right.
 4 So within the broad category of what may come within
 5 "overt upgrade", it could have included a category
 6 status raise, it could have included, for instance --
 7 **A. I accept that, yes.**
 8 Q. -- the notification that if he left the prison for
 9 a hospital visit, he would have to be accompanied by
 10 additional guards, or anything that would have raised
 11 the level of security?
 12 **A. I don't think -- I think if he was -- if he had**
 13 **a hospital appointment, I think I would expect --**
 14 **I don't know the mechanics of escorting from the prison**
 15 **service to hospital but I think that would have been**
 16 **done anyway.**
 17 Q. You don't think or you think?
 18 **A. I think it would have been a matter of course.**
 19 Q. All right.
 20 THE CHAIRMAN: But as far as re-categorisation is concerned,
 21 that in itself would have necessitated a transfer of
 22 prison, wouldn't it?
 23 MS BLACKWELL: Yes, it would.
 24 THE CHAIRMAN: Yes.
 25 MS BLACKWELL: Were you aware that there had already been

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<p>1 an application for Izzet Eren's category status to be 2 raised to A but that that had been refused? 3 A. Not until I read the documentation recently, no. 4 Q. Is that something about which you would have expected to 5 have been aware? 6 A. Not at the moment in time. 7 Q. Thank you. That was not part of your role, to be armed 8 with that sort of information? 9 A. That is correct, yes. 10 Q. Thank you. 11 Then I would like to move on, please, to ask you 12 about the meeting that you attended on 13 November 2015 13 at Wormwood Scrubs prison. 14 A. Yes. 15 Q. That was a meeting attended by yourself, Governor 16 Nichols and Detective Inspector Murray? 17 A. Yes, that's correct. 18 Q. Had you met Mr Murray prior to that meeting on 19 13 November? 20 A. I don't believe I had, no. 21 Q. All right. 22 Did you make any notes whilst you were at the 23 meeting or shortly afterwards? 24 A. No, I didn't. 25 I know DI Murray did, but I didn't.</p> <p style="text-align: center;">Page 53</p>	<p>1 Q. Let's look, please, at the notes that he made and I am 2 doing this in an attempt to jog your memory as to what 3 was discussed during the course of the meeting. 4 Mr Coates, could we have up MPS4490, at page 5, 5 please. Thank you. 6 These are not in your writing, and I appreciate they 7 are not your notes, but I am going to attempt to take us 8 through them and we can see that the notes are made on 9 13 November, and the letters "RM" denotes the initials 10 of Mr Murray, Pete Nichols and DI Steve Mayes at 11 Wormwood Scrubs, background given about Izzet Eren and 12 his prison number, et cetera and his cellmate, I think, 13 whilst being housed in the prison. 14 Then if we can go further down to the notes that 15 appear below the "sensitive/irrelevant" box. 16 It looks as if Mr Murray has been noting here 17 certain information about the timings of the sentencing 18 hearing, which I think by this date he knew was going to 19 take place on 11 December, at Wood Green Crown Court. 20 I would like to ask you about the following entry. 21 It is the third bullet point down, on the second half of 22 the page: 23 "No video-link for sentence or trial, only admin 24 hearings." 25 Do you see that?</p> <p style="text-align: center;">Page 54</p>
<p>1 A. So are you saying the third line down? Yes, I've got 2 it. 3 Q. Do you have it: 4 "No video-link for sentence or trial, only admin 5 hearings." 6 Do you remember that subject being discussed during 7 the course of this meeting? 8 A. No, I can't recall that. 9 Q. Are you aware of any restrictions in place at that time 10 at Wormwood Scrubs prison relating to the use of 11 video-link and its restriction for use on administrative 12 hearings only? 13 A. I certainly cannot recall it, no. 14 Q. Right. 15 Does that mean that you weren't aware that there was 16 a restriction or you are not able to recall what -- 17 A. I wasn't aware there was a restriction and I certainly 18 cannot remember a conversation about it. 19 Q. Right. 20 There is a reference here, below that entry, to: 21 "Not necessary, same van on way back, probably 22 Pentonville." 23 Do you remember there being a discussion about the 24 fact that Izzet Eren may not be brought back to Wormwood 25 Scrubs prison following the sentencing hearing?</p> <p style="text-align: center;">Page 55</p>	<p>1 A. I can't recall that conversation. I am sure it 2 happened, but I can't remember. 3 Q. There is then the following reference: 4 "Seek ad hoc PAS, listening to check if any linked 5 material to escape." 6 I think that is. 7 Then there is a reference to PAS4. 8 Could you help us with this, please, Mr Mayes. What 9 do the letters "PAS" refer to? 10 A. It is -- I think it stands for police advisers' section. 11 It was a series of forms that were used for the sharing 12 of intelligence between the prison and law enforcement 13 agencies. 14 Q. All right. Are those the application forms for the 15 manner in which material that you have described was 16 able to be shared? 17 A. Yes, that's correct, yes. 18 Q. In other words, were the systems formalised so that if 19 a law enforcement agency wished to be provided with 20 information, whether that is written information or 21 telephone -- 22 A. They were generally used for intelligence gathering 23 requests, which is slightly different from the CRIMINT 24 to Mercury, where we -- what we would think is relevant 25 to the prison, we would transfer and vice versa.</p> <p style="text-align: center;">Page 56</p>

<p>1 Q. Right.</p> <p>2 A. So PAS forms were used for intelligence development</p> <p>3 requests.</p> <p>4 Q. Thank you.</p> <p>5 Moving further down the note, I would like to ask</p> <p>6 you about this entry:</p> <p>7 "Flagged external on prison warning system, only if</p> <p>8 doctor or nurse directs prisoner to leave prison for</p> <p>9 hospital, X-ray, A&E, must have three guards to</p> <p>10 supervise."</p> <p>11 Do you remember there being a conversation about the</p> <p>12 circumstances, limited circumstances, in which</p> <p>13 Izzet Eren would be allowed to leave the prison and the</p> <p>14 enhanced security that should be in place if that were</p> <p>15 to happen?</p> <p>16 A. I remember there was a conversation about if there was</p> <p>17 a hospital appointment, but I can't remember the detail</p> <p>18 about that conversation at all.</p> <p>19 Q. All right. Thank you.</p> <p>20 Could we now put up, please, Mr Coates, IPC48, at</p> <p>21 page 7. I was hoping to find the second page of those</p> <p>22 notes.</p> <p>23 We can find the correct reference for that, if we</p> <p>24 can take that down, please, Mr Coates.</p> <p>25 Do you remember anything else of significance about</p> <p style="text-align: center;">Page 57</p>	<p>1 the meeting?</p> <p>2 A. No, I mean my role, if you are happy for me to --</p> <p>3 I looked at my role as being an introductory -- I was</p> <p>4 introducing Rob to Pete. I mean normally if I was</p> <p>5 involved in any decision making, of course it would have</p> <p>6 taken notes but it was Rob Murray was the investigating</p> <p>7 officer and I was there purely just to introduce the two</p> <p>8 of them to each other. To facilitate the meeting ...</p> <p>9 Q. All right.</p> <p>10 THE CHAIRMAN: Did they not know each other before?</p> <p>11 A. No.</p> <p>12 THE CHAIRMAN: Thank you.</p> <p>13 MS BLACKWELL: So you, if I can put it this way, took</p> <p>14 a backseat role, really?</p> <p>15 A. Yes, I had a good working relationship with Pete, so</p> <p>16 I knew him quite well, so I said I would go along with</p> <p>17 Rob. I think, I am fairly sure I just met Rob outside</p> <p>18 the prison for first time and then we went in together,</p> <p>19 introduced the two and then Rob obviously discussed what</p> <p>20 he needed to discuss with Pete.</p> <p>21 Q. During the course of the meeting, was it apparent to you</p> <p>22 that what was being planned by Mr Murray and his team</p> <p>23 was allowing the conspiracy plan to run on the basis</p> <p>24 that they hoped on 11 December to make arrests and in</p> <p>25 his mind, that was the plan going forwards, rather than</p> <p style="text-align: center;">Page 58</p>
<p>1 anything else?</p> <p>2 A. Yes. I wouldn't necessarily say conspiracy. I wasn't</p> <p>3 aware of the conspiracy.</p> <p>4 Q. That is my word.</p> <p>5 A. Sorry.</p> <p>6 THE CHAIRMAN: The plan to escape.</p> <p>7 A. Yes, yes.</p> <p>8 MS BLACKWELL: Thank you.</p> <p>9 So that we can complete the notes, please,</p> <p>10 Mr Coates, could we have up IPC408 at page 7.</p> <p>11 Thank you.</p> <p>12 I am just scanning down these notes to see whether</p> <p>13 there is anything else which I need to ask you about.</p> <p>14 I don't think there is.</p> <p>15 Thank you very much. Can we take those down,</p> <p>16 please.</p> <p>17 Finally, Mr Mayes, I would like to ask you about the</p> <p>18 report that was commissioned and written by the National</p> <p>19 Offender Management Service following the police</p> <p>20 intervention or interception that took place on</p> <p>21 11 December and the death of Jermaine Baker.</p> <p>22 Are you familiar with the report which was prepared</p> <p>23 by Brian Pollett and Carolyn Lund?</p> <p>24 A. In the last four or five days, yes, I have become aware</p> <p>25 of it.</p> <p style="text-align: center;">Page 59</p>	<p>1 Q. You hadn't seen it before then?</p> <p>2 A. No.</p> <p>3 Q. I am going to ask us to look at one or two paragraphs of</p> <p>4 this report, so that I can seek your opinion about it</p> <p>5 and also to look at the strategic partnership agreement</p> <p>6 that existed at the time between the National Offender</p> <p>7 Management Service and law enforcement agencies.</p> <p>8 Mr Coates, please could we have up HMP25 at page 7.</p> <p>9 The next page, please. In fact could I bring you</p> <p>10 back to page 2 of the numbers in the middle of the page.</p> <p>11 Thank you.</p> <p>12 If we look down to paragraph 1.6 of the executive</p> <p>13 summary, the report reads:</p> <p>14 "The protocols for the sharing of intelligence</p> <p>15 between the Metropolitan Police and NOMS were not used</p> <p>16 on this occasion. NOMS' approval for the police</p> <p>17 operation was not sought at a senior HQ level in advance</p> <p>18 of 11 December."</p> <p>19 Were you aware at the time that this report was</p> <p>20 being commissioned, so shortly after 11 December 2015,</p> <p>21 that NOMS had not been informed of the plan that</p> <p>22 Mr Murray was discussing with you and Mr Nichols on</p> <p>23 13 November?</p> <p>24 A. I wasn't aware. You see, from a police perspective,</p> <p>25 when we talk about NOMS, that in my eyes was the prison</p> <p style="text-align: center;">Page 60</p>

15 (Pages 57 to 60)

<p>1 service.</p> <p>2 Q. Right.</p> <p>3 A. So Pete, although I have since found out he might look</p> <p>4 differently, was part of NOMS. So it was NOMS HQ at</p> <p>5 Clive House, but my engagement was with the actual</p> <p>6 prison itself, which I interpreted as NOMS.</p> <p>7 Q. So in your mind, the prison had been informed?</p> <p>8 A. Yes, of course.</p> <p>9 Q. But you were not aware of any further dissemination of</p> <p>10 the information which you had told to Governor Nichols?</p> <p>11 A. I wasn't aware, no. I didn't know what Pete would do</p> <p>12 with that.</p> <p>13 In that -- in the meeting with Rob, it was mentioned</p> <p>14 that he would have to obviously speak to his line</p> <p>15 management team.</p> <p>16 Q. It was mentioned by Governor Nichols?</p> <p>17 A. Yes, that I can recall.</p> <p>18 Q. Right.</p> <p>19 So Mr Murray was aware that that conversation was</p> <p>20 going to happen?</p> <p>21 A. He was present in the meeting, so yes.</p> <p>22 Q. Yes, thank you.</p> <p>23 Given the information that you have just provided</p> <p>24 I am not going to take you to any further aspects of the</p> <p>25 report, but I am going to ask you, please, to look with</p> <p style="text-align: center;">Page 61</p>	<p>1 us at the strategic partnership agreement. This is at</p> <p>2 HMP25, so the same document, but page 24, please.</p> <p>3 Thank you.</p> <p>4 I think you have also been provided with this</p> <p>5 document recently, Mr Mayes, is that right?</p> <p>6 A. Yes, the last four or five days, yes.</p> <p>7 Q. It is headed, as we can see, "The strategic partnership</p> <p>8 agreement between National Offender Management Service</p> <p>9 and law enforcement agencies".</p> <p>10 Could we look, please, at page 26, which is page 3</p> <p>11 of the document. We can see here, under the second main</p> <p>12 paragraph headed "Partnership principles", the</p> <p>13 following:</p> <p>14 "Our relationship will be based on mutual</p> <p>15 understanding, trust and collaboration. This means that</p> <p>16 we will work together to reach agreements on priorities</p> <p>17 and plans, ensuring transparency of intentions and</p> <p>18 actions ..."</p> <p>19 Then, towards the bottom of that paragraph:</p> <p>20 "Share problems and concerns at the earliest</p> <p>21 opportunity and take positive steps to address them."</p> <p>22 Were you aware of the existence of this partnership</p> <p>23 agreement at the time that you attended the meeting on</p> <p>24 13 November and acted in the way that you have described</p> <p>25 today?</p> <p style="text-align: center;">Page 62</p>
<p>1 A. I was aware that there was an information sharing</p> <p>2 agreement in place, yes.</p> <p>3 Q. Had you seen this document whilst you were performing</p> <p>4 your role for the PIU?</p> <p>5 A. I think it is -- this is a newer version of that</p> <p>6 document.</p> <p>7 Q. Right.</p> <p>8 A. But, yes, I would have read it at some point, I think</p> <p>9 probably when I went into the role in the RPIU, yes.</p> <p>10 Q. Thank you, can we move now to page 31, Mr Coates.</p> <p>11 This is a separate document, it is entitled "The</p> <p>12 National Offender Management Service and law enforcement</p> <p>13 agencies, statement of common principles for sharing</p> <p>14 prison intelligence".</p> <p>15 We can see that it was implemented in March 2012,</p> <p>16 with a review date of March 2013.</p> <p>17 Could we turn, please, Mr Coates to page 33.</p> <p>18 The introduction states:</p> <p>19 "This document seeks to outline the common</p> <p>20 principles for the provision of and the exchange of</p> <p>21 information between the primary law enforcement</p> <p>22 agencies, NOMS and the prison service in order to assist</p> <p>23 the risk assessment and risk management of all prisoners</p> <p>24 coming into the custody of the prison service and their</p> <p>25 release back into the community."</p> <p style="text-align: center;">Page 63</p>	<p>1 Could we turn to page 35, please. Section 1,</p> <p>2 "Purpose of the statement of common principles":</p> <p>3 "The statement of common principles for sharing</p> <p>4 prison intelligence is required to improve the flow of</p> <p>5 information and exchange of intelligence between LEAs</p> <p>6 and prisons in order to reduce the risks to those</p> <p>7 managing prisoners within establishments, their moves</p> <p>8 and the categorisation of prisoners. It will also</p> <p>9 reduce risk of harm to the public by improving the</p> <p>10 prevention, investigation, prosecution and penalising of</p> <p>11 crime and thus impact positively on ..."</p> <p>12 Then there are a series of bullet points.</p> <p>13 Finally, could we turn to page 41, please. Thank</p> <p>14 you, second paragraph down:</p> <p>15 "Where the LEA hold or are aware of such information</p> <p>16 that would be relevant to assessing the risks posed by</p> <p>17 the prisoner, and that prisoner is likely to be</p> <p>18 remanded, sentenced or is being returned to custody of</p> <p>19 HMPS, the LEA should share information. This will be</p> <p>20 done by using the nationally agreed person escort record</p> <p>21 form process."</p> <p>22 Pausing there, are you aware of what the PER form</p> <p>23 is?</p> <p>24 A. Yes, I am, yes.</p> <p>25 Q. Can you describe to us what it is?</p> <p style="text-align: center;">Page 64</p>

1 **A. It is not something our unit are involved in. Because**
 2 **it was usually when a prisoner -- so when a person is**
 3 **charged in police custody, there is an onus on the**
 4 **investigating officer or the arresting officer to**
 5 **complete a PER form, which gives that initial**
 6 **intelligence and any risks concerning that particular**
 7 **prisoner. It is a document that goes with them, which**
 8 **is then transferred to the prison. So the prison**
 9 **reception team would be aware of those initial risks.**
 10 Q. Okay, and so it is an important document to allow any
 11 information to be passed on to any new establishment
 12 that the prisoner may be taken to?
 13 **A. Yes, it is effectively the police officers who are**
 14 **dealing with the prisoner as such, sharing any**
 15 **concerns/intelligence with the prison service, yes.**
 16 MS BLACKWELL: Sir, we will look at these forms when we deal
 17 with the next witness, Governor Nichols.
 18 Looking back at the document, please, we can see in
 19 the middle of the page, in the fourth paragraph down,
 20 the following:
 21 "All relevant information regarding the offences for
 22 which the prisoner has been remanded, sentenced or
 23 recalled, all relevant information regarding risk or
 24 vulnerability of prisoner suicide, self-harm or threat
 25 to life, current and relevant health risks, known risks

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1 **a prisoner is literally transferred from the police**
 2 **station to the court and then subsequently on to prison,**
 3 **so it is the initial intelligence that is shared by**
 4 **using that process. That is my understanding of it.**
 5 Q. It is quite apparent, isn't it, that what is expected
 6 when one reads across both of these protocols, is
 7 an openness and a sharing of information, not only
 8 between the law enforcement agencies and prison but also
 9 the National Offender Management Service?
 10 **A. Hence why that intelligence report was created, because**
 11 **that came -- that information came later, so we had the**
 12 **process in place to share that intelligence with the**
 13 **prison service through the CRIMINT onto the Mercury**
 14 **system.**
 15 Q. Does it concern you that in relation to the National
 16 Offender Management Service, as is quite clear from the
 17 report to which we have already made reference, that
 18 they were kept in the dark about the escape plan for
 19 11 December?
 20 **A. Well, I think, as I said earlier, so Pete Nichols in my**
 21 **eyes was representing NOMS and I was aware that he was**
 22 **informing his own line management team.**
 23 Q. Have you read the report?
 24 **A. Yes.**
 25 Q. Then you will be aware, as we have already touched upon,

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1 of escape and the risk of harm to the public in the
 2 event of an escape or abscond."
 3 That information would expect to be written down on
 4 the PER form and passed on?
 5 **A. That is my understanding, yes.**
 6 Q. Yes.
 7 Finally, the following page, please, Mr Coates.
 8 The third paragraph down, we see:
 9 "The role of the police prison intelligence officer,
 10 or PIO, is crucial to maintaining and developing the
 11 vitally important link between law enforcement agencies
 12 and prison establishments."
 13 That is the role that you were fulfilling in
 14 relation to the matters which we have discussed; is that
 15 right?
 16 **A. Yes, well I had management responsibilities for the PIO**
 17 **who was performing that role, yes.**
 18 Q. Looking at the aspects of this statement of common
 19 principles, do you agree that where there is a concern
 20 relating to the risk posed by a prisoner, particularly
 21 in relation to escape, it is imperative that that
 22 information is shared, not only with the prison service
 23 but also in a wider sense with the National Offender
 24 Management Service?
 25 **A. Yes, those forms were designed, like I say, for when**

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1 that there was criticism of the fact that the NOMS
 2 service, not the prison but the NOMS service itself, was
 3 not told of the escape attempt.
 4 **A. Yes, I think you are referring to the NOMS HQ, so the**
 5 **national oversight of NOMS.**
 6 Q. Yes.
 7 **A. I went to the prison -- to NOMS within the prison**
 8 **service. But, yes, I have seen -- I have obviously seen**
 9 **the criticism, yes.**
 10 Q. All right.
 11 **A. I don't accept it, but I have seen the criticism.**
 12 Q. You don't accept the criticism?
 13 **A. Well, because I think I performed -- informing**
 14 **Pete Nichols of the intelligence, then NOMS were**
 15 **informed, yes.**
 16 MS BLACKWELL: Well then, we hear your evidence.
 17 Sir, that concludes the questions which I intend to
 18 ask. Before I turn to the core participants, is there
 19 anything which you would like to ask?
 20 Just excuse me, please, sir.
 21 THE CHAIRMAN: Certainly. (Pause)
 22 MS BLACKWELL: Mr Butt has asked for permission to put
 23 questions to Mr Mayes on two aspects, which seems
 24 reasonable to me.
 25 THE CHAIRMAN: Yes, Mr Butt.

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<p>1 Questions from MR BUTT</p> <p>2 MR BUTT: The first aspect concerns the protocols and the</p> <p>3 extent to which the protocols were ignored in this case.</p> <p>4 Do you have a copy of the NOMS report in front of</p> <p>5 you?</p> <p>6 A. Yes.</p> <p>7 Q. Could you look at paragraphs 6.2 and 6.3, please.</p> <p>8 MS BLACKWELL: In an attempt to assist, Mr Coates, could we</p> <p>9 have HMP25 back up, please, at page 11. Thank you.</p> <p>10 MR BUTT: Thank you.</p> <p>11 Do you see at 6.2, where the NOMS report says that</p> <p>12 the protocols were completely bypassed?</p> <p>13 A. I do, yes.</p> <p>14 Q. At 6.3, does the report make the point that these</p> <p>15 protocols are not underpinned by a formal memorandum of</p> <p>16 understanding but operate in accordance with general</p> <p>17 expected conduct?</p> <p>18 A. Yes, I do, yes.</p> <p>19 Q. Had anyone ever informed you, from NOMS, of</p> <p>20 a requirement to tell NOMS HQ at Clive House in the</p> <p>21 event there was intelligence such as this?</p> <p>22 A. No, they hadn't, no.</p> <p>23 Q. You had told Mr Nichols, yes?</p> <p>24 A. I did, yes.</p> <p>25 Q. You knew Mr Nichols had told his manager, Ms Martin,</p> <p style="text-align: center;">Page 69</p>	<p>1 yes?</p> <p>2 A. Well --</p> <p>3 THE CHAIRMAN: He knew that he was going to tell his line</p> <p>4 manager.</p> <p>5 A. Yes.</p> <p>6 MR BUTT: Can I ask that we look, please, at paragraph 8.3:</p> <p>7 "Mr Martin and Mr Nichols both rely upon Mr Monaghan</p> <p>8 to decide what action to take about the information that</p> <p>9 had been given to them by DI Murray. Mr Monaghan</p> <p>10 mistakenly assumed that senior NOMS HQ staff knew of and</p> <p>11 had approved the planned police operation."</p> <p>12 Were you aware of that?</p> <p>13 A. Not until I read this document four or five days ago.</p> <p>14 Q. By telling Mr Nichols this information, did you</p> <p>15 understand that you had provided sufficient information</p> <p>16 to NOMS to deal with as they saw fit?</p> <p>17 A. That's correct, yes.</p> <p>18 THE CHAIRMAN: He said Nichols equals NOMS.</p> <p>19 MR BUTT: Yes. The witness had not been taken to the part</p> <p>20 that said the protocols weren't written down.</p> <p>21 THE CHAIRMAN: Very good.</p> <p>22 MR BUTT: You were asked about the prison form, the PER</p> <p>23 form, is it correct that that form relates to a prisoner</p> <p>24 who is being taken from police custody to prison? From</p> <p>25 a police perspective?</p> <p style="text-align: center;">Page 70</p>
<p>1 A. Yes, it is not something I was involved in for many,</p> <p>2 many years, but that was my understanding, yes.</p> <p>3 Q. Or if the prisoner was being transported from one prison</p> <p>4 to another?</p> <p>5 A. That I can't say, I wouldn't know.</p> <p>6 Q. In this case, we know that Mr Eren had arrived at</p> <p>7 Wormwood Scrubs on 29 October, were you aware of that?</p> <p>8 A. I knew it was very close to the date when I got the</p> <p>9 intelligence, so I don't know for sure it was</p> <p>10 29 October.</p> <p>11 Q. Would the police have included information on the PER</p> <p>12 form at a time other than when a prisoner was being</p> <p>13 transferred to custody?</p> <p>14 A. Sorry, can you -- I am trying to understand the context</p> <p>15 of the question, sorry.</p> <p>16 Q. When intelligence is put onto the PER form, at what</p> <p>17 stage of the process will that happen?</p> <p>18 A. The custody sergeant has a responsibility for ensuring</p> <p>19 that that form is done, is my understanding of it,</p> <p>20 because it was not something I was involved in for many</p> <p>21 years. So there is an expectation on an officer --</p> <p>22 nowadays they have detention officers in custody suites,</p> <p>23 again I am making an assumption but somebody, whether it</p> <p>24 is the investigating officer or the detention officer,</p> <p>25 would have the responsibility for doing the normal</p> <p style="text-align: center;">Page 71</p>	<p>1 checks on the Police National Computer and highlighting</p> <p>2 any risks or concerns on that form.</p> <p>3 Q. In a case where a prisoner has already arrived at the</p> <p>4 prison, would the police then make a further entry on</p> <p>5 the PER form?</p> <p>6 A. Not to my understanding, no, I don't believe that is the</p> <p>7 case.</p> <p>8 MR BUTT: Thank you, sir.</p> <p>9 THE CHAIRMAN: All right.</p> <p>10 Anyone else?</p> <p>11 MS BLACKWELL: I don't think so, sir.</p> <p>12 THE CHAIRMAN: Very good, thank you.</p> <p>13 MS BLACKWELL: Thank you, Mr Mayes.</p> <p>14 I note the time, sir, we are going to move on to</p> <p>15 Governor Nichols next, but it might be convenient to</p> <p>16 take an early lunch.</p> <p>17 THE CHAIRMAN: Unless it is thought useful to make a start</p> <p>18 with his evidence now, I am entirely in your hands.</p> <p>19 MS BLACKWELL: I think we would rather take an early lunch,</p> <p>20 thank you.</p> <p>21 THE CHAIRMAN: All right.</p> <p>22 Then we will have an early start this afternoon, if</p> <p>23 that is all right. Should we start at 1.30?</p> <p>24 MS BLACKWELL: Could we start at 1.45, please.</p> <p>25 THE CHAIRMAN: Yes, very good.</p> <p style="text-align: center;">Page 72</p>

<p>1 MS BLACKWELL: Thank you.</p> <p>2 THE CHAIRMAN: We are expecting to finish Mr Nichols's</p> <p>3 evidence this afternoon.</p> <p>4 MS BLACKWELL: We are, and also Mr Smith.</p> <p>5 THE CHAIRMAN: Thank you.</p> <p>6 Very good.</p> <p>7 (12.40 pm)</p> <p>8 (The Luncheon Adjournment)</p> <p>9 (1.45 pm)</p> <p>10 THE CHAIRMAN: Good afternoon, everyone.</p> <p>11 Yes.</p> <p>12 MS BLACKWELL: Good afternoon, sir. The gentleman in the</p> <p>13 witness box is Peter Nichols. Could he be sworn,</p> <p>14 please?</p> <p>15 THE CHAIRMAN: Yes.</p> <p>16 MR PETER NICHOLS (sworn)</p> <p>17 Questions from MS BLACKWELL</p> <p>18 MS BLACKWELL: Is your full name Peter Nichols?</p> <p>19 A. Peter Mark Nichols.</p> <p>20 Q. Peter Mark Nichols, thank you.</p> <p>21 Mr Nichols, certainly in December 2015 you were</p> <p>22 a governor at Wormwood Scrubs prison?</p> <p>23 A. Yes.</p> <p>24 Q. Do you still hold that role at that institution?</p> <p>25 A. I am not the governor, I am one of the governors there,</p> <p style="text-align: center;">Page 73</p>	<p>1 but I am still there, yes.</p> <p>2 Q. Thank you.</p> <p>3 You are employed by HMPPS?</p> <p>4 A. Yes.</p> <p>5 Q. Which hands for Her Majesty's Prison and Probation</p> <p>6 Services and is part of the Ministry of Justice?</p> <p>7 A. Yes.</p> <p>8 Q. In 2015, was part of your responsibility head of</p> <p>9 security and intelligence within the prison?</p> <p>10 A. Part of my job was, yes.</p> <p>11 Q. Do you still hold that role?</p> <p>12 A. No, I have moved, three years ago.</p> <p>13 Q. I would like to begin your evidence, please, by asking</p> <p>14 you some questions about categorisation of prisoners.</p> <p>15 A. Yes.</p> <p>16 Q. Is Wormwood Scrubs a category B local prison?</p> <p>17 A. Yes.</p> <p>18 Q. What does that mean?</p> <p>19 A. Fundamentally, we are a local prison so we serve the</p> <p>20 local Magistrate and Crown Courts that are assigned to</p> <p>21 that establishment. So the majority of our cohort of</p> <p>22 prisoners should be on remand pending further court</p> <p>23 appearances. We should also hold a 25 per cent</p> <p>24 approximate cohort of prisoners who are category C and</p> <p>25 they are the purpose of Wormwood Scrubs in preparation</p> <p style="text-align: center;">Page 74</p>
<p>1 for a local release, so if they are from a local</p> <p>2 catchment area.</p> <p>3 Q. When you refer to remand prisoners, does that mean that</p> <p>4 Wormwood Scrubs is not a prison where convicted</p> <p>5 prisoners or sentenced prisoners are held?</p> <p>6 A. Yes, we can do. We are entitled to, but our setup and</p> <p>7 our foundations and infrastructure are predominantly for</p> <p>8 remand prisoners. So the only example, I can give you,</p> <p>9 another category B training prison, say HMP Swaleside,</p> <p>10 would have more workshops and do more sentence planning</p> <p>11 with prisoners, rather than the remand setting that we</p> <p>12 would cater for.</p> <p>13 Q. I understand, thank you.</p> <p>14 Is there a difference between a prisoner who is</p> <p>15 categorised as B to one categorised as A?</p> <p>16 A. Yes.</p> <p>17 Q. Is it a significant difference?</p> <p>18 A. Yes.</p> <p>19 Q. Can you explain to us, please, how that difference</p> <p>20 attaches to a prisoner?</p> <p>21 A. I can. It may be a lengthy process.</p> <p>22 Q. Please take your time.</p> <p>23 A. If you lose me, please stop me and I will try and help</p> <p>24 you out.</p> <p>25 There are four categories of male prisoners.</p> <p style="text-align: center;">Page 75</p>	<p>1 Q. Yes.</p> <p>2 A. A, B, C and D. Specifically to A and B, there is one</p> <p>3 type of B prisoner, but there is three types of A</p> <p>4 prisoners.</p> <p>5 So there is category A standard, there is category A</p> <p>6 high risk and there is category A exceptional.</p> <p>7 Q. Right.</p> <p>8 A. Predominantly, most category A prisoners would be</p> <p>9 a standard category A. Very few would be high risk.</p> <p>10 I don't think there are any exceptionals in the country</p> <p>11 at the moment, but I wouldn't know, to be honest.</p> <p>12 Q. Are you able to assist us in this regard, in terms of</p> <p>13 the prison population and this, I appreciate, is</p> <p>14 speaking very generally -- what percentage would you</p> <p>15 expect to be categorised as A, at any one time?</p> <p>16 A. The number of prisons or the number of prisoners?</p> <p>17 Q. Prisoners.</p> <p>18 A. I would say at the moment our capacity is around</p> <p>19 87,000ish.</p> <p>20 Q. Throughout the country?</p> <p>21 A. Yes, across the country.</p> <p>22 Q. Yes.</p> <p>23 A. I would imagine you are probably talking 1 per cent.</p> <p>24 Q. 1 per cent at category A?</p> <p>25 A. Yes, I wouldn't know exact figures.</p> <p style="text-align: center;">Page 76</p>

1 Q. But it is a small percentage?
 2 **A. Very, yes. Yes.**
 3 Q. That would include the three types of category A, but as
 4 you have said, the majority of those categorised as A
 5 would be standard category A?
 6 **A. Yes.**
 7 Q. What is the difference in terms of the way in which
 8 a prisoner is housed or held or treated between category
 9 B and standard category A?
 10 **A. There is quite a significant difference, so the main one**
 11 **is the infrastructure of the prison.**
 12 Q. Right.
 13 **A. So category B, C and D prisons would be made of concrete**
 14 **cells, whereas category A cells would have wire mesh**
 15 **between the brickwork of the cells. Category As would**
 16 **have more CCTV, they would have a higher staff ratio,**
 17 **they would have advanced security, such as gyrophones,**
 18 **which are helicopter wires, to prevent helicopters**
 19 **landing in the prison grounds, they would have patrol**
 20 **dogs, which are German Shepherds.**
 21 Q. Within the prison?
 22 **A. Yes, for category As. Enhanced CCTV, they would have**
 23 **a greater security function, and dedicated search teams,**
 24 **all category A prisoners would be fully searched and**
 25 **their cell searched a maximum of every 14 days. They**

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1 THE CHAIRMAN: If he was category A he wouldn't be with you
 2 anyway?
 3 **A. He wouldn't, but he initially would be when he came in**
 4 **from the court.**
 5 THE CHAIRMAN: Yes.
 6 **A. So if a chap had been arrested for an alleged offence,**
 7 **held in the police station and then produced at**
 8 **Magistrates' Court the following day, for a significant**
 9 **charge, let's say murder, he would automatically come to**
 10 **Wormwood Scrubs or a cat B local. We would then flag up**
 11 **that he is charged with an offence that would meet**
 12 **category A criteria, and we would have to hold them in**
 13 **our segregation unit for up to 72 hours while NOMS HQ**
 14 **and the category A section would delve into his case and**
 15 **get that information and they have 72 hours to make that**
 16 **decision, so within those 72 hours, we are allowed to**
 17 **hold category A prisoner in our segregation unit only**
 18 **and they will make that decision within a day or two at**
 19 **the most.**
 20 Q. I have not asked you specifically, but does it follow
 21 from the evidence that you have given so far that
 22 Wormwood Scrubs is not a prison -- other than in the
 23 circumstances in which you have explained -- that would
 24 house category A prisoners?
 25 **A. No, we wouldn't. No.**

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1 **would be more stricter in searching movement around the**
 2 **prisons, so if they were going from their location on**
 3 **their wing or their house block to visits, they would**
 4 **require to be fully searched prior and post that visit,**
 5 **whereas in a category B prison we would fully search**
 6 **10 per cent, so it's a random figure. So there are lots**
 7 **of permutation between the difference between A and B,**
 8 **but they would probably be the main ones I would pick**
 9 **out for you.**
 10 Q. Thank you.
 11 In terms of occasions when a prisoner has to leave
 12 the prison, so in order to go to court for a hearing or
 13 to hospital for treatment, is there a difference between
 14 the arrangements that would be made in those
 15 circumstances for a category B prisoner as opposed to
 16 a category A prisoner?
 17 **A. Yes, so at my level, I couldn't authorise a category A**
 18 **to go to hospital. It would have to come from the**
 19 **director of security.**
 20 Q. Right.
 21 **A. Whereas at the moment at Wormwood Scrubs, any prisoner**
 22 **that requires hospital treatment, I could endorse and**
 23 **send him out in an ambulance or with staff, depending on**
 24 **the medical need, but if it is category A, it has to be**
 25 **authorised by the on-call director.**

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1 Q. Right.
 2 If, as you have described, or at any other time
 3 a prisoner were to be re-categorised whilst being housed
 4 at Wormwood Scrubs from a B to an A, what would happen
 5 to them?
 6 **A. We would get notification from headquarters, from the**
 7 **category A section, to say they have received further**
 8 **information, this prisoner is now to be treated as**
 9 **category A, moved into your segregation unit, transport**
 10 **will be arranged and you will be notified when he is**
 11 **being transferred. And that would happen within**
 12 **72 hours.**
 13 Q. Have you known that to happen since you have been head
 14 of security?
 15 **A. Yes. Yes.**
 16 Q. To which prison or prisons would that prisoner be
 17 transferred?
 18 **A. Usually it is Belmarsh, because that is the nearest**
 19 **category A to us.**
 20 Q. Thank you.
 21 I am going to move now to ask you some specific
 22 questions about Izzet Eren and his categorisation in
 23 November 2015.
 24 During the course of time that he was housed at
 25 Wormwood Scrubs, and before 11 December, was he ever

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<p>1 re-categorised?</p> <p>2 A. No.</p> <p>3 Q. So he was and always remained a category B prisoner?</p> <p>4 A. No. He was unclassified, he wasn't sentenced,</p> <p>5 I understand he was on a recall from his custodial</p> <p>6 sentence, but his remand in terms of categorisation</p> <p>7 would take preference, he would be unclassified. He was</p> <p>8 being held in cat B, in cat B conditions but personally</p> <p>9 he is unclassified because he hasn't been sentenced by</p> <p>10 the courts, he hasn't been found guilty.</p> <p>11 Q. Perhaps that is something that I should have explored</p> <p>12 with you.</p> <p>13 Is it the case then from what you have said that</p> <p>14 until a prisoner is sentenced, he up until that point is</p> <p>15 unclassified?</p> <p>16 A. Correct.</p> <p>17 Q. But is held according to the system in place at</p> <p>18 whichever prison he is at?</p> <p>19 A. Yes. And the exception to that would be category A,</p> <p>20 they will be considered as provisional.</p> <p>21 Q. Right.</p> <p>22 A. Provisional category A, because they are still awaiting</p> <p>23 to be found guilty in a court of law.</p> <p>24 Q. All right.</p> <p>25 Because it is right, isn't it, that whilst he was</p> <p style="text-align: center;">Page 81</p>	<p>1 housed at Wormwood Scrubs, was there an application for</p> <p>2 him to be provisionally categorised as category A?</p> <p>3 A. Yes.</p> <p>4 Q. In what circumstances did that application come about?</p> <p>5 A. So every prisoner that comes in, obviously we get the</p> <p>6 warrant from the court, and that will tell us what</p> <p>7 offence they have been charged with.</p> <p>8 There are sets procedures that if any prisoner comes</p> <p>9 in from the Magistrate or Crown Court that is charged</p> <p>10 with a list of these serious offences, they are to be</p> <p>11 flagged up to HQ for further interrogation to see if</p> <p>12 they are a consideration for category A.</p> <p>13 Q. Right.</p> <p>14 A. Those offences, there are six, I think there are six or</p> <p>15 seven main ones, that would be murder, attempted murder,</p> <p>16 possession of firearms, rape, serious sexual assault,</p> <p>17 possession with intent to supply of class A of in</p> <p>18 excessive of £10 million, there are about six, seven or</p> <p>19 eight offences that would be flagged up on reception.</p> <p>20 He would be held in normal conditions and we would flag</p> <p>21 it up to HQ that day and then they would get back to us</p> <p>22 with I think it is a process called an MG5, which is the</p> <p>23 police report.</p> <p>24 Q. Right.</p> <p>25 A. They will interrogate that, we don't have access to</p> <p style="text-align: center;">Page 82</p>
<p>1 that, and they will say, "Yes, he is confirmed cat A</p> <p>2 move him to a segregation unit", or, "No, he has been</p> <p>3 rejected", and I believe with Mr Eren he was rejected.</p> <p>4 THE CHAIRMAN: If the application to provisionally</p> <p>5 categorise him as cat A had succeeded, he would have to</p> <p>6 all intents and purposes been treated as a category A</p> <p>7 prisoner, in segregation for up to 72 hours --</p> <p>8 A. Yes.</p> <p>9 THE CHAIRMAN: -- and then moved to a cat A prison?</p> <p>10 A. Yes.</p> <p>11 THE CHAIRMAN: Thank you.</p> <p>12 MS BLACKWELL: Within your witness statement, Mr Nichols,</p> <p>13 that is dated 22 April of this year, and has been</p> <p>14 prepared with these proceedings in mind, you very</p> <p>15 helpfully set out a timeline in relation to Izzet Eren</p> <p>16 and Eren Amoyaw-Gyamfi, which I am going to ask for us</p> <p>17 to look at together on the display.</p> <p>18 A. Okay.</p> <p>19 Q. Mr Coates, could you display please HMP26, page 2 and</p> <p>20 highlight the first half of that page.</p> <p>21 If we just read through that together, Mr Nichols.</p> <p>22 On 13 October 2015 Izzet Eren and Amoyaw-Gyamfi were</p> <p>23 arrested in possession of firearms.</p> <p>24 On 15 October they were remanded into custody at HMP</p> <p>25 Thameside.</p> <p style="text-align: center;">Page 83</p>	<p>1 On 29 October, they pleaded guilty and were sent to</p> <p>2 prison pending sentencing at Wood Green Crown Court on</p> <p>3 11 December.</p> <p>4 On 3 November the prison submitted an application</p> <p>5 for both men to be categorised as provisional cat A</p> <p>6 prisoners due to their firearms offences -- that is one</p> <p>7 of the offences that you have just set out.</p> <p>8 A. Yes.</p> <p>9 Q. On the same date, the NOMS category A team stated that</p> <p>10 neither of the prisoners matched the category A criteria</p> <p>11 and should remain category B prisoners.</p> <p>12 Then, finally, on 11 December they attended Wood</p> <p>13 Green Crown Court for sentencing.</p> <p>14 A. Yes.</p> <p>15 Q. We can see in the next paragraph that you set out that</p> <p>16 both men had been on remand at your prison since</p> <p>17 29 October 2015, having been arrested together on</p> <p>18 13 October whilst riding a stolen motorcycle and in</p> <p>19 possession of multiple firearms. They were intercepted</p> <p>20 before using the weapons in connection with gang</p> <p>21 violence and that Izzet Eren was known to be heavily</p> <p>22 involved in gang activity in north London and in 2011 he</p> <p>23 had been sentenced to eight years for supplying drugs.</p> <p>24 Was that information that you were aware of at the</p> <p>25 time that they were at Wormwood Scrubs prison?</p> <p style="text-align: center;">Page 84</p>

1 A. Not initially when they would have come in. So this
 2 information would have come to us over a period of time,
 3 from various sources, some could have come from the
 4 police, some could have come from probation, some could
 5 have come from Thameside, and bearing in mind Thameside
 6 is a privately run prison, it's not in the public
 7 sector, so we don't have the connections with them like
 8 we would our public sector partners, so information
 9 would have slightly delayed, by days.
 10 So, you know, we wouldn't have had this on the first
 11 few days but over the coming weeks we would have done.
 12 Q. What is the process by which information is passed from
 13 one prison establishment to another when a prisoner is
 14 transferred?
 15 A. It is automatically uploaded between 1.00 and 2.00 in
 16 the morning.
 17 Q. Before the prisoner is transferred or on the day?
 18 A. No, that night, so if a prisoner transfers in at 3.00 on
 19 a Thursday, when we book him into our system, we will
 20 get certain aspects of his details, but his security and
 21 intel card won't kick over until 1.00 in the morning.
 22 Q. Right. So for the first few hours, the new
 23 establishment may not be in a position of having a full
 24 picture about that prisoner?
 25 A. For remand prisoners, no. For sentenced prisoners they

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1 It is at HMP7.
 2 A. Sorry, my eyes are not brilliant, but even this is
 3 blurred with my glasses blurred with my glasses on, I am
 4 not sure if there is something wrong with the screen or
 5 not.
 6 I will make do.
 7 THE CHAIRMAN: We can do hard copies if you prefer.
 8 A. I will go with this for now.
 9 THE CHAIRMAN: Are you sure?
 10 A. That is fine. They are only 1.5.
 11 MS BLACKWELL: Thank you very much, Mr Coates.
 12 This email is to you from Steven Mayes and it says:
 13 "Pete, as discussed, please be mindful that any
 14 overt upgrade in security regarding the below intel
 15 within the prison may compromise duty of care to our own
 16 source."
 17 Then there is a reference to information which had
 18 been recorded on a CRIMINT record:
 19 "Intelligence indicates that Izzet Eren will escape
 20 from custody whilst in transit."
 21 And the letter B, and the numbers 2 and 5, which are
 22 lifted directly from the CRIMINT report.
 23 Do you remember receiving that email?
 24 A. Yes, I have read it recently, yes.
 25 Q. It looks as if from the first two words of the email

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1 would, because sentencing establishments would have to
 2 send a transfer report prior to that transfer, so they
 3 would send all the security information and what we call
 4 NOMIS information, their personal information and case
 5 notes prior to any planned transfer. But for those on
 6 remand, there is a delay, yes.
 7 Q. Right.
 8 I am going to ask you some questions now about
 9 information that came to your attention on
 10 30 October 2015.
 11 On that date, did you first become aware of
 12 a possible escape involving Izzet Eren?
 13 You can take that down.
 14 A. I am going to say yes, because of the statements I have
 15 read this week. Yes.
 16 Q. All right. Do you remember that information coming to
 17 your knowledge but you are not sure of the date now
 18 perhaps?
 19 A. Yes. Yes.
 20 Q. Thank you.
 21 Do you remember receiving an email from Detective
 22 Inspector Steven Mayes from the Regional Prison
 23 Intelligence Unit?
 24 A. Yes.
 25 Q. We are going to look at that email, please, Mr Coates.

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1 that this followed a discussion between you and
 2 Mr Mayes.
 3 A. Yes.
 4 Q. Can you confirm that that did happen?
 5 A. He would have phoned and I would have asked him to put
 6 it in writing, because it was the way I would operate.
 7 Q. What did he mean when he asked you to be mindful of any
 8 overt upgrade in security?
 9 A. From my recollection, he had informed me that it was
 10 an ongoing police operation and that that was continuing
 11 and anything that I did, they didn't want me to
 12 jeopardise their police operation, so could I be mindful
 13 not to -- excuse me -- not to segregate him, not to have
 14 him searched unnecessarily or out of normal procedures
 15 and some of those other things that are process driven
 16 for every prisoner, sometimes we would do additional
 17 measures. As an example, every prisoner would be
 18 searched coming into custody, but based on intelligence
 19 we could body scan prisoners or use handheld detectors
 20 rather than an observational physical search.
 21 So he didn't want anything out of the ordinary to
 22 happen, he just wanted us to process this prisoner as
 23 normal.
 24 Q. Right. When you were given this information about the
 25 intelligence, were you told what the source was?

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<p>1 A. No.</p> <p>2 Q. Did you discover what the source was at any time?</p> <p>3 A. No.</p> <p>4 Q. Did that matter to you?</p> <p>5 A. No. It is kind of expected that the source and the</p> <p>6 tactic are never revealed. So, no, I wouldn't have</p> <p>7 asked.</p> <p>8 Q. You know not to ask?</p> <p>9 A. Yes.</p> <p>10 Q. In terms of this information, when you received it on</p> <p>11 30 October, was that before or after there had been the</p> <p>12 application to NOMS for his provisional categorisation</p> <p>13 to be raised?</p> <p>14 A. Depends on timings, it would come down to timings.</p> <p>15 So if the chap has come into custody on the 29th,</p> <p>16 was it you said?</p> <p>17 Q. Yes.</p> <p>18 A. So that would have been escalated on the 29th, but that</p> <p>19 would have been the process for anyone charged with</p> <p>20 those offences.</p> <p>21 Q. Were you concerned when you received this information</p> <p>22 that this should be passed on to anybody who was going</p> <p>23 to assess whether or not his categorisation should be</p> <p>24 raised?</p> <p>25 A. No. This type of information would not affect his</p> <p style="text-align: center;">Page 89</p>	<p>1 categorisation.</p> <p>2 Q. Why not?</p> <p>3 A. Because this is about an escape risk, not his risk to</p> <p>4 the public or a risk to the Secretary of State.</p> <p>5 So categorisation is very different from escape</p> <p>6 risk.</p> <p>7 Q. Right.</p> <p>8 So even if this information had been known to the</p> <p>9 NOMS team who were assessing his provisional</p> <p>10 categorisation, it is your evidence that it would not</p> <p>11 have affected their decision?</p> <p>12 A. No, so -- and again to give you some examples of that,</p> <p>13 an escape-risk prisoner, Wormwood Scrubs can hold those,</p> <p>14 we can hold those.</p> <p>15 Q. You can hold them?</p> <p>16 A. Yes, they can be a category C prisoner, a category B or</p> <p>17 category A, but, yes, we can hold escape list, E list</p> <p>18 prisoners, escaped prisoners and we have done recently</p> <p>19 and over the years.</p> <p>20 Q. Would your answer to that question change in any way if</p> <p>21 you had been told that there had been an attempt to</p> <p>22 spring Izzet Eren from the prison van on his journey on</p> <p>23 29 October, but that that plan at some stage had been</p> <p>24 aborted?</p> <p>25 A. Yes. I was unaware of that until recently. When I read</p> <p style="text-align: center;">Page 90</p>
<p>1 the pack, to be honest.</p> <p>2 THE CHAIRMAN: I am sure that Ms Blackwell is going to come</p> <p>3 to that, but I think what she is asking you at the</p> <p>4 moment is if you had -- not if you had known, would you</p> <p>5 have expected a pre-existing and abortive attempt to</p> <p>6 escape to be taken into account when deciding</p> <p>7 an application for provisional A categorisation?</p> <p>8 Is that the question?</p> <p>9 MS BLACKWELL: It is.</p> <p>10 A. Yes, of course it would, because it would be further</p> <p>11 information to the case.</p> <p>12 He would have been -- he wouldn't have been further</p> <p>13 considered for category A, but he would have been for</p> <p>14 escape risk. So that wouldn't have affected his</p> <p>15 category A status, but it would have affected his escape</p> <p>16 risk status.</p> <p>17 Q. In practical terms, what difference would that have</p> <p>18 made?</p> <p>19 A. Okay, so if I had have known that, I probably would have</p> <p>20 put him on the escape list, which would have meant he</p> <p>21 would had to have worn blue and yellow overalls during</p> <p>22 the day, he would have an officer assigned to him on</p> <p>23 every movement around the prison, his cell would be</p> <p>24 searched every 28 days and have to change location every</p> <p>25 28 days. His cell would be checked daily on the bars</p> <p style="text-align: center;">Page 91</p>	<p>1 and the locks and fabric of that cell, to make sure</p> <p>2 nothing has been altered. He would be fully checked</p> <p>3 before each activity, before visits and after visits.</p> <p>4 So there are loss of processes for an escape risk</p> <p>5 prisoner that happens. Some are similar to category A</p> <p>6 but that information would not affect his</p> <p>7 categorisation, but it would affect the security inside</p> <p>8 the prison, ie on the escape list.</p> <p>9 Q. If you had been told that that aborted attempt had</p> <p>10 included firearms, would that have further concerned you</p> <p>11 or would that have been taken into account?</p> <p>12 A. It depends on the level of information that we were</p> <p>13 given. He would already have been flagged up to</p> <p>14 headquarters because of the firearm charges. We would</p> <p>15 then obviously have added more information to that,</p> <p>16 which may have affected their decision. I don't know.</p> <p>17 Q. Thank you.</p> <p>18 Going back to the discussion that you had with</p> <p>19 Mr Mayes on 30 -- sorry, Mr -- yes, Mr Mayes?</p> <p>20 A. Mr Mayes, yes.</p> <p>21 Q. On 30 October, and the email that we have just looked</p> <p>22 at.</p> <p>23 We can take that down, please, Mr Coates.</p> <p>24 When you received that intelligence, what was your</p> <p>25 priority?</p> <p style="text-align: center;">Page 92</p>

1 **A. To make sure we hold him safely and securely and his**
 2 **needs are met, the same as everyone.**
 3 **When you are evaluating risk, the risk was that he**
 4 **would try to escape in transit.**
 5 Q. Right.
 6 **A. Now we knew from his warrant that he was either found**
 7 **guilty or pleaded guilty and was going back for**
 8 **sentencing. So the risk is now minimalised because**
 9 **there is no planned transit moves now. Now he is at**
 10 **Wormwood Scrubs, apart from the court date which was in**
 11 **December, there is no planned transit moves.**
 12 **So the risk is somewhat significantly reduced for**
 13 **the next five or six weeks, so it does give us a bit of**
 14 **time to gather some further information.**
 15 **What I did put in place was that if he was to go out**
 16 **on escort for a medical emergency, that that would be**
 17 **escalated to three star.**
 18 Q. From two?
 19 **A. Yes.**
 20 Q. Right. You personally saw that that was recorded in his
 21 record?
 22 **A. Yes. Because the risk was outside of the prison, not**
 23 **inside the prison.**
 24 Q. Right.
 25 THE CHAIRMAN: As a future escape risk, if he had to go to

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1 **unusual for that request to come through but the risk**
 2 **was minimal for me at that point.**
 3 Q. I would like to look, please, at an email which you
 4 received from Detective Chief Inspector Williams after
 5 11 December.
 6 Mr Coates, this is at HMP11, please.
 7 **A. I'm sorry, that is really blurred, I can't read that at**
 8 **all.**
 9 Q. Is that better?
 10 **A. I am going to read it out to you anyway, Mr Nichols:**
 11 **"Peter, I just wanted to drop you a line of thanks**
 12 **for your support and assistance regarding the planned**
 13 **attempt to free two prisoners en route to Wood Green**
 14 **Crown Court on 11 December. Although Detective**
 15 **Inspector Rob Murray met with you to provide**
 16 **an oversight of what we were planning and how we**
 17 **intended to manage the safe custody of Izzet Eren and**
 18 **Amoyaw-Gyamfi, ultimately we required your acquiescence**
 19 **to allow us to do our job of tackling serious and**
 20 **organised crime. You were under no obligation to assist**
 21 **and it would have been totally understandable if you**
 22 **chose another course of action. Your assistance, both**
 23 **in the planning of the operation and our execution on**
 24 **the day, were key components in the delivery of our**
 25 **plan.**

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1 hospital, he was going to have three rather than two?
 2 **A. Yes, and he will go with double handcuffs, so the**
 3 **standard escort procedure would be one handcuff and then**
 4 **handcuffed to the officer and then there would be**
 5 **a separate officer. For a heightened prisoner, they**
 6 **will be cuffed to themselves and cuffed to an officer**
 7 **and there will be another two officers as well. It's**
 8 **just more strength to the escort.**
 9 MS BLACKWELL: Right, thank you.
 10 THE CHAIRMAN: Yes.
 11 MS BLACKWELL: Did you feel any discomfort about being told
 12 that you should not share the information any more
 13 widely than with your own governor?
 14 THE CHAIRMAN: Based on the email?
 15 MS BLACKWELL: Yes.
 16 THE CHAIRMAN: Yes.
 17 **A. Kind of, yes. But I think, you know, my experience**
 18 **tells me that there would be more information coming in**
 19 **the next couple of days, so –**
 20 MS BLACKWELL: Right.
 21 **A. Like I said just now, the risk was in transit. He is**
 22 **here, he is located now, so that risk is kind of**
 23 **significantly reduced. Unless he was going out on**
 24 **an unplanned escort for medical treatment or something.**
 25 **So the risk wasn't immediate. So, no, it was**

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1 **"The sad events of that day will be played out for**
 2 **many months and perhaps years to come in both the courts**
 3 **and media. From our point of view, the sooner the true**
 4 **facts come out the better for all concerned.**
 5 **"These will demonstrate amongst other things that at**
 6 **no time was the safety of the custodians and occupants**
 7 **of that prison van put in any jeopardy. In the interim,**
 8 **if you require anything further from me for yours or**
 9 **your senior management's perspective, then please don't**
 10 **hesitate to contact either me or Rob:**
 11 **"It just leaves me to wish you and all your staff at**
 12 **Wormwood Scrubs a very happy and peaceful Christmas."**
 13 **Paragraph 2 is what I want to ask you about, where**
 14 **Detective Chief Inspector Williams is suggesting to you**
 15 **that you were under no obligation to assist him and he**
 16 **would have totally understood if you had chosen another**
 17 **course of action.**
 18 **Do you think that accurately and fairly reflects how**
 19 **you felt, having been told to keep this information**
 20 **quiet?**
 21 **A. Well I didn't. I raised it with my managers. I think**
 22 **the first part, if we could break that down into two,**
 23 **the first part was me being under no obligation to**
 24 **assist. The reason that they told us and spoke to me**
 25 **was because they needed the registration plate of the**

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<p>1 Serco vehicle. So we have approximately between 8 and 2 12 Serco vehicles a day coming in and leaving the 3 prison. 4 Q. Yes. 5 A. At that time of the morning, when the chaps are going to 6 court, there will be at least probably 10 or 12, Serco 7 vehicles. They will -- they have no idea which van they 8 would be on. 9 Q. Right. 10 A. So they had to approach me to some degree to say, "We 11 need to know which van he is on". Without that, none of 12 this could have happened. 13 Q. Can I just ask you to pause there, please, because 14 was -- we are going to come to the first of two meetings 15 that you had with Mr Murray. 16 A. Yes. 17 Q. But was it your view that the only reason you were being 18 told about this plan was because they needed to know the 19 registration number of the van that he would be on? 20 A. After the first meeting, yes, not the initial -- not at 21 the initial email from Mr Mayes, no. But from the 22 meeting with Rob Murray, clearly they needed our help to 23 do this, and that is the only way they were going to get 24 it. 25 Q. All right. I am going to go then to the notes of the</p> <p style="text-align: center;">Page 97</p>	<p>1 meeting. Did you make any notes of the meeting that you 2 had with him on 13 November? 3 A. Not that I recall, no. 4 Q. Right. You certainly remember enough of it to have 5 written about it in your witness statement. You confirm 6 there that you met DI Rob Murray, who was of the 7 organised crime command, and Detective Inspector Mayes, 8 Steven Mayes, at the prison. 9 Was Mr Mayes somebody that was familiar to you? 10 A. Yes, he was the inspector for the prison intel unit. He 11 managed the PIOs and PLOs within the London prisons and 12 he would attend our monthly -- we used to have monthly 13 head of security meetings, so the head of security in 14 each London prison would meet monthly and Steve would 15 attend them, so yes. 16 Q. Presumably the meeting had been pre-arranged? 17 A. Yes, they wouldn't have just turned up, yes. 18 Q. Was there anybody else present other than the three of 19 you? 20 A. No. 21 Q. Can you remember how long the meeting lasted? 22 A. No. It wouldn't have been a significant amount of time, 23 because there wasn't a significant amount of information 24 passed over to me. I would be guessing half hour to 25 an hour, I really don't know.</p> <p style="text-align: center;">Page 98</p>
<p>1 Q. During the course of the meeting, Mr Murray explained to 2 you that the plan was to allow Izzet Eren to leave the 3 prison in a prison van and be taken to Wood Green Crown 4 Court and that during the course of the journey there 5 would be a covert surveillance operation in force. Did 6 he tell you that that would be firearms supported? 7 A. Yes. 8 Q. All right. 9 Did he tell you how the operation was going to 10 ensure that the prison van never came into contact with 11 the conspirators? 12 A. From my recollection, he made it very clear that the 13 covert operation, there was enough resources and 14 unmarked vehicles that the intercepting vehicle would 15 never get to the prison van because those people were 16 under surveillance as well, so when they were moving the 17 police would be following them and they would intervene 18 before it got close to the van. 19 Q. Did he persuade you that there was sufficient separation 20 able to be achieved in order to reduce the risk? 21 A. Yes. 22 Q. During the course of the meeting, and I am looking at 23 paragraph 27 of your witness statement, and I am going 24 to read out what you have put there and it is: 25 "DI Murray told me that the police intelligence was</p> <p style="text-align: center;">Page 99</p>	<p>1 from a covert source and not to share this intelligence 2 with anyone else. This was so as not to jeopardise this 3 source." 4 I want to put to you an alternative. Did he say to 5 you that you had to keep the information confidential so 6 as not to jeopardise the source or so as not to 7 jeopardise his operation? 8 A. I took it as both, if I am honest. Now I didn't know 9 whether the source was an undercover police officer or 10 a member of the gang or -- I had no idea who it was. 11 Q. No. 12 A. And still don't. 13 Q. Or what it was? 14 A. No, yes. So, yes, for me, from my perspective, it was 15 both, the operation and the source. 16 Q. And the source. 17 Was that something which you discussed in any 18 further detail than how you have described it in your 19 statement? 20 A. No, because I wouldn't have asked, because they wouldn't 21 have told and I am kind of used to that world, so ... 22 Q. Let's look at the notes, please, Mr Coates, they are at 23 MPS4490, at page 5. 24 If you have been having difficulty reading what is 25 on the screen --</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

1 THE CHAIRMAN: You ain't seen nothing yet.
 2 MS BLACKWELL: You are going to have real difficulty with
 3 this.
 4 **A. I thought it was my eyes.**
 5 THE CHAIRMAN: No, there is nothing wrong with your eyes.
 6 MS BLACKWELL: I am going to take you to specific aspects of
 7 this note, which I am going to read out to you so please
 8 don't panic.
 9 The notes relate to a meeting in relation to Utara,
 10 which you may or may not know was the name of the wider
 11 operation into Turkish criminal networks?
 12 **A. No.**
 13 Q. RM is a reference to Mr Murray being present, together
 14 with you and DI Steve Mayes and the meeting was taking
 15 place at Wormwood Scrubs.
 16 I am going to ask you about the content of the note
 17 that lies below the box that says
 18 "Sensitive/irrelevant".
 19 **A. Okay.**
 20 Q. By 6.15 -- thank you.
 21 **A. That is a bit better.**
 22 Q. Thank you, Mr Coates:
 23 "By 6.15 we will know where on van he is"?
 24 **A. "What van ..."**
 25 Q. What van he is on", correct, you are better than me.

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1 **arrive at the prison at 6.00, go through the list of**
 2 **prisoners in the vans and then allocate the vans to**
 3 **which courts they are going to be going to.**
 4 Q. Just asking you to pause again, is it often the case
 5 that a van will drop at more than one court centre?
 6 **A. It can do, yes.**
 7 Q. Or perhaps "often" is overstating it, but sometimes
 8 a van will drop off at one court centre and then take
 9 another prisoner or prisoners to a second court centre?
 10 **A. It would do, but not in this case because Wood Green**
 11 **Crown Court is not one of Wormwood Scrubs' courts, it is**
 12 **what we call an out-of-area court. So when the guys**
 13 **came into Wormwood Scrubs, they shouldn't have come to**
 14 **us. I think it was Pentonville had reached capacity and**
 15 **they had locked down.**
 16 Q. That would have been the usual place for them to have
 17 been taken from Wood Green?
 18 **A. Yes, not to Wormwood Scrubs.**
 19 Q. Because it is some distance, isn't it?
 20 **A. And traffic in London, it is just -- yes, horrendous.**
 21 Q. Not really practical?
 22 **A. So, yes, I would be very, very surprised if, because it**
 23 **is an out-of-area court they would go direct to the**
 24 **court, because they would have to come back to our own**
 25 **courts, but yes, they can go to other courts normally,**

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1 "On [something] by 7.00 am."
 2 There is another time:
 3 "7.30 leave. All vans leave by 8.00 am."
 4 Then this:
 5 "No video-link for sentence or trial, only admin
 6 hearings."
 7 **A. Hmm.**
 8 Q. First of all, is that something which you were aware of
 9 at the time of the meeting?
 10 **A. Yes. That is standard practice for us.**
 11 **So just to put that into context for you, so the**
 12 **night before, Serco will produce a list of prisoners**
 13 **that they are collecting for court, a confirmation list,**
 14 **some Crown Courts are later in the day before they can**
 15 **confirm who they want. They will send that to the**
 16 **prison and we will generate our own list of who is going**
 17 **to unlock them in the morning.**
 18 **At approximately 6.00 in the morning, the two Serco**
 19 **staff, the early starts as they are referred to, turn up**
 20 **to the prison and allocate which van is going to which**
 21 **court. That has to be done by around 6.15 in the**
 22 **morning.**
 23 Q. Is that the reference, do you think, to 6.15?
 24 **A. Yes, so I wouldn't know the day before which van was**
 25 **being used. It wouldn't be until those two Serco staff**

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1 **yes.**
 2 Q. What about the reference to no video-link for sentence
 3 or trial, only admin hearings?
 4 **A. No, so unfortunately, Wormwood Scrubs is an old**
 5 **Victorian prison, our infrastructure is not great, we**
 6 **don't have capacity, we didn't then, to offer courts via**
 7 **video-link, we only do probation interviews and bail**
 8 **applications only. So any trials or prisoners going up**
 9 **for sentencing are physically produced.**
 10 Q. That was the position in 2015?
 11 **A. Yes, it is not now. We have --**
 12 Q. You have better facilities?
 13 **A. Yes.**
 14 Q. All right.
 15 Is that information that you would have imparted to
 16 Mr Murray during the course of the meeting?
 17 **A. Yes, they wouldn't have known that.**
 18 Q. Thank you.
 19 In fact, if there had been a consideration by
 20 Mr Murray and his team to prevent the escape by
 21 arranging for the sentencing hearing to take place over
 22 video-link, would that have necessitated Izzet Eren and
 23 Erwin Amoyaw-Gyamfi being transferred to another prison
 24 or could you exceptionally have allowed that to happen?
 25 **A. We couldn't have facilitated it, we didn't have the set**

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<p>1 up to do it, with the Crown Courts, we physically</p> <p>2 couldn't do it. They would have been produced at court.</p> <p>3 Q. Would have been produced at court or if there was</p> <p>4 a determination to avoid them being produced at court,</p> <p>5 they would have to have been transferred to another</p> <p>6 prison?</p> <p>7 A. Yes, at that time, I would imagine Belmarsh would have</p> <p>8 been then the only prison that could have accommodated</p> <p>9 a Crown Court sentencing hearing, which would have</p> <p>10 involved Wood Green being transferred probably to</p> <p>11 Woolwich Crown Court.</p> <p>12 Q. So not only would the prisoners have been transferred to</p> <p>13 Belmarsh, the court case would have had to have been --</p> <p>14 A. The court probably would have had to have been moved to</p> <p>15 Woolwich.</p> <p>16 Q. Can you confirm, we had this evidence earlier, the</p> <p>17 connection between Belmarsh prison and Woolwich Crown</p> <p>18 Court is an underground tunnel?</p> <p>19 A. It can be both, but, yes, there is an underground route.</p> <p>20 Q. And that makes it extremely secure?</p> <p>21 A. Secure, yes.</p> <p>22 Q. Just looking back at the note, if we may --</p> <p>23 THE CHAIRMAN: When Mr Murray left you on 13 November, he</p> <p>24 would have known that really video-link from Wormwood</p> <p>25 Scrubs was not an option?</p> <p style="text-align: center;">Page 105</p>	<p>1 A. Correct, sir.</p> <p>2 THE CHAIRMAN: Thank you.</p> <p>3 MS BLACKWELL: The next bullet point says:</p> <p>4 "Seek ad hoc PAS listening to check if any linked</p> <p>5 material to escape; if so then apply PAS4 et cetera."</p> <p>6 A. Okay.</p> <p>7 Q. You may not remember a discussion about the PAS</p> <p>8 applications taking place but could I through you,</p> <p>9 please, establish what those forms are and what this</p> <p>10 note refers to?</p> <p>11 A. Yes, I can take you through the PAS forms.</p> <p>12 The PAS forms are a request for information from the</p> <p>13 police to the prison or vice versa from the prison to</p> <p>14 the police.</p> <p>15 Because of data protection, I or any of my staff or</p> <p>16 colleagues cannot just hand over information to outside</p> <p>17 agencies, they need to request it.</p> <p>18 The PAS forms are requests for different things. So</p> <p>19 a PAS1 would be a request for his list of visitors</p> <p>20 visiting the prison, a PAS3 could be a list of people</p> <p>21 that he is phoning, a PAS5 could be a list of this,</p> <p>22 PAS6 ... there are different PASs, about eight different</p> <p>23 things.</p> <p>24 In relation to this one, it doesn't say what PAS it</p> <p>25 is, so it is a bit difficult -- I am assuming the</p> <p style="text-align: center;">Page 106</p>
<p>1 listening would have been for the phones. Our PIN phone</p> <p>2 system, which are recorded.</p> <p>3 Q. Yes.</p> <p>4 A. There is a form called an F7/28, which is an ad hoc</p> <p>5 disclosure, and that is for one specific piece of</p> <p>6 intelligence, which has to be very specific, which they</p> <p>7 wouldn't need -- the police wouldn't need an inspector's</p> <p>8 authorisation, it would be an email to me to say could</p> <p>9 I have this on an ad hoc basis, and they need to justify</p> <p>10 why they wanted it, and I could authorise that without</p> <p>11 going -- completing the whole form.</p> <p>12 So that would be, "Can you confirm that Mrs Jones</p> <p>13 received a phone call from Mr Eren on 10 November at</p> <p>14 1400 hours"?</p> <p>15 And my answer would be, "I am happy to disclose on</p> <p>16 an ad hoc basis the answer to this is yes or no". It</p> <p>17 wouldn't elaborate on the length of that phone call, the</p> <p>18 details of that phone call. It is just a primary</p> <p>19 function before they will submit a complete PAS form.</p> <p>20 Q. I understand.</p> <p>21 A. So that is the ad hoc disclosure element.</p> <p>22 In terms of the completed PAS form, they would need</p> <p>23 to make sure that what they were requesting was</p> <p>24 justifiable, was legal, that they cannot obtain this</p> <p>25 information through any other way, and they would have</p> <p style="text-align: center;">Page 107</p>	<p>1 to be endorsed by a minimum of an inspector, or someone</p> <p>2 senior to the person requesting that information.</p> <p>3 So if DI Murray was requesting it, his superior</p> <p>4 would need to endorse it before it got to me.</p> <p>5 It would then go to the PIO, the police officer that</p> <p>6 is based in the prison. They would act as the</p> <p>7 gatekeeper to make sure that the dates and everything</p> <p>8 requesting fitted in with the PAS and then once he had</p> <p>9 scrutinised it, it would be sent to me for</p> <p>10 authorisation.</p> <p>11 Q. Right.</p> <p>12 Are you able to confirm that in relation PAS1 forms,</p> <p>13 such forms were received by the prison on</p> <p>14 4 November 2015 in relation to these two prisoners?</p> <p>15 A. Yes, the records for those are really accurate, so</p> <p>16 I would be surprised if that is not true, but to best of</p> <p>17 my knowledge it is.</p> <p>18 Q. Thank you.</p> <p>19 During -- I think I know the answer to this</p> <p>20 question, but I am going to ask it anyway -- the course</p> <p>21 of this meeting, were you told there had been a previous</p> <p>22 attempt which had been aborted on 29 October to --</p> <p>23 A. No, I was not.</p> <p>24 Q. -- spring Mr Eren?</p> <p>25 Had you been told that during the course of this</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

<p>1 meeting, what if anything would you have done?</p> <p>2 A. I would have probably put him on the E list.</p> <p>3 Q. Which is the escape risk list that you described?</p> <p>4 A. Yes, sorry, the escape --</p> <p>5 Q. Would you have brought that information to the attention</p> <p>6 of anybody else?</p> <p>7 A. Yes, the whole prison would have known. Because the</p> <p>8 individual would wear a blue and yellow jumpsuit. He</p> <p>9 gets a book, an officer has to be assigned to him</p> <p>10 24 hours a day. So it would have been common knowledge,</p> <p>11 his picture would have been up everywhere.</p> <p>12 Q. His picture would have been up everywhere?</p> <p>13 A. Yes, so in every office, in every wing, in every corner</p> <p>14 of the prison there would be a photocard with a big "E"</p> <p>15 on it, his picture and the reasons why he is on it.</p> <p>16 Q. Does it follow then, from what you have said, that if</p> <p>17 you had been told that information, you would have felt</p> <p>18 your responsibility was not to keep the information</p> <p>19 confidential other than with your governor but to act on</p> <p>20 it?</p> <p>21 A. If I had have had that information, I would have put him</p> <p>22 on the escape list, yes.</p> <p>23 THE CHAIRMAN: You would have put the escape risk, given the</p> <p>24 background, at a higher priority than preserving the</p> <p>25 operation that the police wanted to carry out?</p> <p style="text-align: center;">Page 109</p>	<p>1 A. Yes.</p> <p>2 Yes, if an individual escapes from my prison, I've</p> <p>3 got to answer some very difficult questions and I have</p> <p>4 no kind of -- yes, what the police want to do is up to</p> <p>5 them, but ...</p> <p>6 Q. During the course of this meeting, did you ask Mr Murray</p> <p>7 whether you could share the information about his</p> <p>8 operation with senior staff at NOMS HQ?</p> <p>9 A. Yes, I did raise a question, whether they were aware of</p> <p>10 the operation, because it was significant, firearms were</p> <p>11 involved, and it was something that actually happened</p> <p>12 outside the establishment, so once it has gone outside</p> <p>13 of my gates and he has left in that van, I have no</p> <p>14 control or no authority to do anything, so someone else</p> <p>15 needs to take ownership of that.</p> <p>16 Q. First, could I just interrupt you, please, and ask you</p> <p>17 to explain what the reference to NOMS HQ means?</p> <p>18 A. So that would be category A section. So -- and it is</p> <p>19 not called PAS section anymore, I think it is called OPT</p> <p>20 now, operational partnership team, but it was the old</p> <p>21 PAS section, where that is a combination of senior</p> <p>22 leaders and directors and senior police and</p> <p>23 superintendents work together and set kind of the</p> <p>24 parameters and structures and stuff.</p> <p>25 So they would have made that decision had they been</p> <p style="text-align: center;">Page 110</p>
<p>1 told about it, whether to move him to a category A</p> <p>2 prison because of this intelligence or whether it could</p> <p>3 be managed by me locally.</p> <p>4 Q. Thank you for that explanation.</p> <p>5 So you did raise, during the course of this meeting</p> <p>6 on 13 November, whether or not NOMS HQ had been</p> <p>7 informed?</p> <p>8 A. Hmm.</p> <p>9 Q. Would it be your duty to pass that information on to</p> <p>10 them?</p> <p>11 A. Not directly. I would have taken it to my governor.</p> <p>12 Q. Which you did?</p> <p>13 A. Yes.</p> <p>14 Q. But having asked the question during the meeting, what</p> <p>15 was Mr Murray's answer?</p> <p>16 A. That they didn't want to compromise the operation.</p> <p>17 I was led to believe that the operation had been</p> <p>18 running -- I want to say 12 to 18 months from my</p> <p>19 recollection. And this was part of their operation.</p> <p>20 Clearly from my experience in security, they had</p> <p>21 a source somewhere, who that was and what that was</p> <p>22 I don't know, and made it very clear that actually,</p> <p>23 if -- I think he knew and I am surmising here, if it was</p> <p>24 raised up to HQ, they would have moved him.</p> <p>25 Q. Did you have that discussion with Mr Murray? I mean was</p> <p style="text-align: center;">Page 111</p>	<p>1 it as blatant as that?</p> <p>2 A. It was in terms of he was saying that if we raise it up,</p> <p>3 we are going to lose this operation.</p> <p>4 Q. Did he say that if we raise it up, he had</p> <p>5 an understanding that he would have been categorised as</p> <p>6 a provisional cat A?</p> <p>7 A. He didn't use those words but I think he knew that if it</p> <p>8 went outside the establishment, then --</p> <p>9 Q. That would be the result?</p> <p>10 A. Yes.</p> <p>11 He didn't actually say those words, I am not sure he</p> <p>12 would have been aware of that process but I think, yeah,</p> <p>13 he knew.</p> <p>14 Q. All right.</p> <p>15 Following the meeting, and I think we can take that</p> <p>16 note down now, please, we know that you had a discussion</p> <p>17 with Emily Martin?</p> <p>18 A. Yes.</p> <p>19 Q. Who at that time was the prison's deputy governor. What</p> <p>20 made you take the decision to inform Emily Martin about</p> <p>21 the information that you had received?</p> <p>22 A. She is my line manager, so, you know, she needs to kind</p> <p>23 of know what I know in some respects.</p> <p>24 Also, it is not a decision that I felt was in my</p> <p>25 capabilities to make. The potential of the problem was</p> <p style="text-align: center;">Page 112</p>

1 going outside the establishment and that is not my
 2 jurisdiction.
 3 What I would say is that nothing was agreed in terms
 4 of that operation at that meeting, which is why we never
 5 took it to Gary Monaghan, who was the governor.
 6 Q. At that time?
 7 A. Yes, but I did raise it with Emily.
 8 Q. You did raise it with Emily and I think you and she
 9 agreed not to take it any further until you had heard
 10 back from Mr Murray at a closer time to 11 December.
 11 A. Yes.
 12 Q. As well as speaking to Emily Martin, did you make
 13 an entry on Izzet Eren's prison file in the terms in
 14 which you have already described, that if he were to
 15 leave the prison, he needed to be escorted in the way in
 16 which you have described, by three guards and double
 17 handcuffed?
 18 A. Yes.
 19 Q. Let's just pause in the chronology for a moment to talk
 20 about a prisoner's record.
 21 Can you explain to the inquiry, please, the manner
 22 in which information such as that is recorded in
 23 relation to each prisoner?
 24 A. So that would be recorded on his NOMIS, which is
 25 an electrical file about him and everything that goes on

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1 information is captured on the Mercury system?
 2 A. Loads. And it will range from something extremely minor
 3 to something really significant. So -- I will give you
 4 an example.
 5 A member of staff could walk past a cell on A wing
 6 and they would smell cannabis, so they would put
 7 a Mercury report on saying that at 2.00 this afternoon,
 8 I walked past A wing cell 17 and it smelt of cannabis.
 9 The security analysts would then look who is in cell
 10 17 and do some work around that to see if there is more
 11 intel reports and then they would recommend a cell
 12 search with dogs at some point, depending on the intel
 13 they have got.
 14 That is not what NOMIS is for, that is security and
 15 that is Mercury, so Mercury is an intel gathering
 16 information system.
 17 Q. All right, so if a prisoner for argument's sake is in
 18 Wormwood Scrubs in 2011 and there is something on his
 19 Mercury record noted, and then he goes back to
 20 a different prison to Pentonville to serve a sentence in
 21 2013, and there is further intelligence that needs to be
 22 recorded against him or on his record, is it recorded on
 23 the same record, does a prisoner's record continue on
 24 each occasion that he might come into a prison
 25 establishment?

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1 with him.
 2 And so if he was going to go out on an escort, on
 3 an unplanned escort, for a medical emergency or
 4 something like that, the manager on duty would log on to
 5 his file to see if there was any alerts on his NOMIS
 6 page, and that would say, I am not saying that Mr Eren
 7 was this, but it could say that he was a risk to
 8 children, he was a risk to females, in which case you
 9 would send male staff out with him. Potentially he is
 10 an escape risk, therefore we need to double cuff him and
 11 put three staff on it. There may be alerts, that he has
 12 family members working at a local hospital, so don't
 13 send him to St Mary's, make sure you send to Thomas, or
 14 it could be any number of things but there is an alerts
 15 page on there that gives that dispatching manager the
 16 information he needs at that time.
 17 Q. I think you have described it as a NOMIS record, is that
 18 the same as a Mercury record?
 19 A. No, completely two different systems.
 20 Q. What is the Mercury system, please?
 21 A. Mercury is a security and intelligence system.
 22 Q. That is each prisoner in Wormwood Scrubs would have one
 23 of those?
 24 A. Yes.
 25 Q. It may seem an obvious question, what sort of

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1 A. It does now, yes.
 2 Q. Right.
 3 A. But Mercury was introduced -- I want to say April 2014.
 4 Q. Right.
 5 A. Which was a brand new system to the prison service.
 6 Q. Yes.
 7 A. Prior to April 2014, we had a system called the five by
 8 five system. Which was an old obsolete system, the two
 9 systems do not talk to each other. So there was a huge
 10 data-gathering exercise to get all the information from
 11 the old five by five uploaded onto the Mercury system.
 12 It is in a completely different format to what
 13 Mercury is. So the only way I could explain it, Mercury
 14 is Mercury, the five by five, there would be Excel
 15 spreadsheets within Mercury that you would have to tap
 16 into to get that further information.
 17 Q. So it is available, but --
 18 A. You would have to dig a lot deeper to get it, whereas
 19 now it is automatic, they come up in the right format.
 20 Anything prior to then wouldn't do automatically, you
 21 would have to look for it.
 22 Q. Thank you.
 23 Before we turn to the meeting on 8 December, just
 24 one more question to ask you about the meeting on
 25 13 November, and it is this.

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1 Was there any discussion during the course of that
 2 meeting about whether or not Izzet Eren had access to
 3 a mobile telephone?
 4 **A. Yes.**
 5 Q. Can you remember what that discussion was?
 6 **A. Not in detail. I remember looking at his intel picture**
 7 **and we had very little on him. In some respects he was**
 8 **a model prisoner, he didn't do anything wrong.**
 9 **So the information was surprising. But we knew that**
 10 **he hadn't made hardly any phone calls in his time there,**
 11 **so we made the assumption that he had access to a mobile**
 12 **phone.**
 13 **It is a good indicator, if no one is using their PIN**
 14 **account, they must be using another method.**
 15 Q. Right.
 16 Did it cross your mind at that stage to arrange for
 17 his cell and for him to be searched in order to
 18 establish whether he did have a mobile phone?
 19 **A. No, because there was no supporting intel that he did.**
 20 **So we wouldn't have done.**
 21 THE CHAIRMAN: But of course if you had known that he had
 22 been a risk, an escape risk, over and above what was
 23 planned, if he was still there, he would have been
 24 searched regularly?
 25 **A. Yes.**

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1 **A. Yes.**
 2 Q. We can see Serco control room, there is then some
 3 information that has been redacted.
 4 Van route from Scrubs, fax, into Scrubs by 5.30 am,
 5 Pete Nichols in by 6.00 am. Van --
 6 **A. "First van leaves by 7.30."**
 7 Q. Thank you, and, "Van, last left by 8.30"?
 8 **A. Yes, we have performance targets, the first van needs to**
 9 **go out by 7.30 and the last van has to leave by 8.30, so**
 10 **within that hour everyone goes.**
 11 Q. Everyone leaves and that would be information that you
 12 had provided to him?
 13 **A. Yes.**
 14 Q. Right. Type of van, either 4 or 6 or?
 15 **A. 12 seater.**
 16 Q. A 12 seater.
 17 And:
 18 "Operation OP after van ..."
 19 I can't make that out at all ... is there any more
 20 information on that page, please, Mr Coates?
 21 THE USHER: Could we cut the feed, please?
 22 MS BLACKWELL: Could we cut the feed, please?
 23 THE USHER: Feed has been cut.
 24 THE CHAIRMAN: Yes, Mr Butt.
 25 (2.47 pm)

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1 THE CHAIRMAN: Yes.
 2 MS BLACKWELL: Let's look, please, at Mr Murray's notes of
 3 the meeting that you had with him on 8 December.
 4 These are, Mr Coates, at IPC408 at page 17, please.
 5 If we can highlight the part of the note that lies
 6 under the wiggly line.
 7 Thank you. Here we have:
 8 "Prison meeting, 8 December, 11.30 [I think that is]
 9 Mr Murray, yourself and Lynn Shepherd."
 10 **A. Yes.**
 11 Q. Who was Lynn Shepherd?
 12 **A. Lynn Shepherd was the inspector in charge of the**
 13 **[Redacted] unit.**
 14 Q. The Prison Intelligence Unit?
 15 **A. No. She would manage prison and [Redacted].**
 16 Q. Right. Okay, and was she there as a result of you
 17 asking her to be there or did she come --
 18 **A. No, I think --**
 19 Q. With Mr Murray?
 20 **A. Must have been. I knew Lynn.**
 21 Q. You had met her before?
 22 **A. Yes, because we had [Redacted] from the prison, so I had**
 23 **had dealings with her before.**
 24 Q. We can see that the Serco drivers on van have Serco
 25 phone and -- is that BlackBerry-type radio?

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1 (Redacted portion of transcript)
 2 (2.48 pm)
 3 THE USHER: Resume the feed, please.
 4 THE CHAIRMAN: Thank you very much, Mr Butt.
 5 MR BUTT: It is implicit, sir, you granted an order in
 6 relation to what was heard and we will --
 7 THE CHAIRMAN: Yes.
 8 MR BUTT: Thank you.
 9 MS BLACKWELL: Thank you very much.
 10 All I can make out there is "access to car park
 11 opposite", but I don't think there is anything on there
 12 that I need to ask you about, so we can take that down,
 13 thank you Mr Coates.
 14 During the course of that meeting, Mr Murray told
 15 you that the police operation had been approved by
 16 senior police.
 17 **A. At which meeting, sorry?**
 18 Q. 8 December meeting.
 19 THE CHAIRMAN: The 8 December meeting.
 20 **A. Sorry, yes.**
 21 MS BLACKWELL: I am reading from your witness statement, so
 22 I think you would agree with me.
 23 Did he tell you that the operation included the
 24 deployment of armed police as part of the covert
 25 surveillance of the prison van?

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<p>1 A. Yes.</p> <p>2 Q. When he told you that the operation had been approved by</p> <p>3 senior police, did he discuss with you the manner in</p> <p>4 which that approval had been sought and provided?</p> <p>5 A. No.</p> <p>6 Q. But you were in no doubt during the course of that</p> <p>7 meeting that the operation was going to go ahead?</p> <p>8 A. Yes.</p> <p>9 Q. Did you ask him at that meeting if the senior NOMS team</p> <p>10 at NOMS HQ had been informed?</p> <p>11 A. Yes.</p> <p>12 Q. Did he tell you that they hadn't?</p> <p>13 A. Correct.</p> <p>14 Q. Did you also ask him whether or not Serco, the escort</p> <p>15 provider, had been informed?</p> <p>16 A. Yes.</p> <p>17 Q. Again, did he tell you that they hadn't?</p> <p>18 A. Yes, that's correct.</p> <p>19 Q. Again, were you assured by Mr Murray that the prison van</p> <p>20 carrying Mr Eren and others and the Serco escort staff</p> <p>21 would not be jeopardised?</p> <p>22 A. Absolutely. He was very clear on that, yes.</p> <p>23 Q. Did he also tell you that the police had identified</p> <p>24 a suspect vehicle or a mission vehicle, which was to be</p> <p>25 used in the escape attempt?</p> <p style="text-align: center;">Page 121</p>	<p>1 A. I vaguely remember something about another vehicle, yes.</p> <p>2 Q. Did he tell you that that would be intercepted before it</p> <p>3 became possible for it to come into contact with the</p> <p>4 prison van?</p> <p>5 A. From my recollection, yes, it was near Wood Green Crown</p> <p>6 Court, it wasn't located near to the prison.</p> <p>7 Q. Did you ask Mr Murray what would happen to Izzet Eren</p> <p>8 after he reached court?</p> <p>9 A. Yes.</p> <p>10 Q. Was that because you understood that his involvement in</p> <p>11 an escape attempt would make it necessary to refer him</p> <p>12 to the NOMS cat A team?</p> <p>13 A. Because firearms would have been involved, yes.</p> <p>14 Q. Yes.</p> <p>15 It would be likely, in your view, that in those</p> <p>16 circumstances he would have been re-categorised as</p> <p>17 a provisional cat A?</p> <p>18 A. He would have been, yes.</p> <p>19 Q. Once the meeting was over, did you exchange emails with</p> <p>20 Mr Murray on 8 and 9 December to confirm the</p> <p>21 arrangements?</p> <p>22 A. Yes, I think so.</p> <p>23 THE CHAIRMAN: Yes.</p> <p>24 MS BLACKWELL: At that time, were you concerned about any</p> <p>25 attempt that might be made whilst he was inside or</p> <p style="text-align: center;">Page 122</p>
<p>1 within the prison walls?</p> <p>2 A. No.</p> <p>3 Q. Were you concerned that NOMS HQ and Serco staff were not</p> <p>4 being told of the plan?</p> <p>5 A. Yes.</p> <p>6 Q. Why?</p> <p>7 A. Because I think they had a right to know and I think</p> <p>8 because the event was going to happen outside of</p> <p>9 Wormwood Scrubs it is not in my remit and someone more</p> <p>10 senior needs to make -- needs to be aware.</p> <p>11 Q. What did you do following the meeting on 8 December in</p> <p>12 terms of any discussion you had with those above you?</p> <p>13 A. So I spoke to my deputy governor, Ms Martin, and --</p> <p>14 Q. Again, so for the second time?</p> <p>15 A. Yes, and then we spoke to Gary Monaghan, the governor at</p> <p>16 the time.</p> <p>17 Q. When you spoke to Mr Monaghan, was he working away from</p> <p>18 the prison?</p> <p>19 A. Yes.</p> <p>20 Q. Did you speak to him on the telephone?</p> <p>21 A. Yes.</p> <p>22 Q. What did you say to him?</p> <p>23 A. I relayed the conversation I had with Mr Murray and that</p> <p>24 I was concerned that they had asked us to keep it in</p> <p>25 house. They were worried that if it went outside the</p> <p style="text-align: center;">Page 123</p>	<p>1 establishment it could ruin the operation.</p> <p>2 And kind of put the ball in his court to say it is</p> <p>3 up to you, this is the information I have given you,</p> <p>4 what you want to do with it, it is not for me to say.</p> <p>5 Q. During that telephone conversation, do you think you</p> <p>6 mentioned to Mr Monaghan the fact that you were aware</p> <p>7 that NOMS HQ and Serco had not been informed?</p> <p>8 A. Yes.</p> <p>9 Q. What, if anything, did he say to you when you imparted</p> <p>10 that information to him?</p> <p>11 A. I can't recall what his response was, to be fair.</p> <p>12 I think he mentioned Nick Pascoe, who was the</p> <p>13 director for London at the time.</p> <p>14 Q. The director for London what?</p> <p>15 A. London prisons, sorry.</p> <p>16 Q. Did he sit above Mr Monaghan?</p> <p>17 A. Yes, he was the director for all London prisons.</p> <p>18 I want to say that he said he would speak to Nick,</p> <p>19 Nick Pascoe, about that, and I said fine, that was my</p> <p>20 end of it, really.</p> <p>21 Q. Just to be clear, you were left with the impression that</p> <p>22 Mr Monaghan was going to speak to Mr Pascoe about the</p> <p>23 fact that NOMS and Serco had not been informed?</p> <p>24 A. Yes.</p> <p>25 Q. Did you meet with Mr Monaghan on 10 December?</p> <p style="text-align: center;">Page 124</p>

<p>1 A. Is that the day of the event, is it?</p> <p>2 Q. It is the day before.</p> <p>3 I will read out to you what appears at paragraph 40</p> <p>4 of your witness statement:</p> <p>5 "On 10 December I met with Governor Monaghan and we</p> <p>6 discussed the police operation. I told him that we</p> <p>7 would have to arrange for Izzet Eren to be taken to HMP</p> <p>8 Belmarsh as a provisional cat A prisoner."</p> <p>9 A. Hmm, yes.</p> <p>10 Q. What did you mean by that and when did you expect him to</p> <p>11 be transferred to Belmarsh?</p> <p>12 A. So if the incident happened at Wood Green Crown Court,</p> <p>13 like we were told it was going to, then we would ensure</p> <p>14 that Izzet Eren wouldn't come back to us, that he would</p> <p>15 be housed in Belmarsh.</p> <p>16 Q. Right, so it wasn't your intention that that should</p> <p>17 happen prior to 11 December?</p> <p>18 A. No.</p> <p>19 Q. On 11 December, did you meet</p> <p>20 a Detective Sergeant Calloway at the prison and provide</p> <p>21 him with the registration number of the prison van in</p> <p>22 which Izzet Eren was going to be taken to Wood Green</p> <p>23 Crown Court?</p> <p>24 A. Yes.</p> <p>25 Q. Once the van had left the prison, were you aware that</p> <p style="text-align: center;">Page 125</p>	<p>1 Governor Monaghan at that stage telephoned Nick Pascoe?</p> <p>2 A. I informed Mr Monaghan that Mr Eren had been collected,</p> <p>3 he had been loaded on to the bus and that he had gone</p> <p>4 off to court and that was kind of our end in the</p> <p>5 operation, in theory.</p> <p>6 Q. All right, but I am again reading from your witness</p> <p>7 statement, at paragraph 41:</p> <p>8 "Once the van left the prison, Governor Monaghan</p> <p>9 telephoned Nick Pascoe, deputy director of custody for</p> <p>10 London. At this stage it became apparent to senior</p> <p>11 staff at NOMS HQ that they were unaware of the police</p> <p>12 operation."</p> <p>13 A. Yes.</p> <p>14 Q. Were you present when Mr Monaghan spoke to Mr Pascoe?</p> <p>15 A. Not that I recall, no.</p> <p>16 Q. Is that something that you think you have been told</p> <p>17 afterwards?</p> <p>18 A. Yes.</p> <p>19 Q. I would like to ask you about a discrete issue, and we</p> <p>20 have touched upon it already, that is whether or not</p> <p>21 Izzet Eren had access to a mobile telephone whilst he</p> <p>22 was at HMP Wormwood Scrubs. We know that he did,</p> <p>23 because on 11 December a mobile phone that had been</p> <p>24 broken up into pieces was discovered from the grate near</p> <p>25 to the seat in the cell of the van that he had been</p> <p style="text-align: center;">Page 126</p>
<p>1 travelling in.</p> <p>2 Were you aware that there was information on</p> <p>3 Mr Izzet Eren's Mercury system to indicate that on</p> <p>4 previous occasions when he had been a prisoner, he had</p> <p>5 access or there was an indication that he had had access</p> <p>6 to mobile phones?</p> <p>7 A. Yes, there was some historical information on his file,</p> <p>8 yes.</p> <p>9 Q. Right. Were you aware of that during the conversations</p> <p>10 that you were having with Mr Murray in November and</p> <p>11 December 2015?</p> <p>12 A. It would have been around that time, because once they</p> <p>13 brought him to the attention of me, I would have looked</p> <p>14 at some of his files, so I would not have known it</p> <p>15 beforehand but certainly after the first meeting I would</p> <p>16 have looked into Mr Eren a bit more closely.</p> <p>17 Q. Armed with that information, and the lack of use of the</p> <p>18 prison telephone system, was that not enough for you to</p> <p>19 decide that he should, and his cell, should be searched?</p> <p>20 A. No.</p> <p>21 Q. Why not?</p> <p>22 A. There was no specific intelligence. If we had</p> <p>23 intelligence that a certain member of public had phoned</p> <p>24 in, "I was phoned at 11.00 last night by Mr Eren, he was</p> <p>25 threatening me at 11.00 from his cell, this is the</p> <p style="text-align: center;">Page 127</p>	<p>1 number that has phoned me", or we had other information</p> <p>2 that a member of staff heard him talking in the toilet</p> <p>3 and was suspecting him of using a mobile phone, then we</p> <p>4 would search him. But we didn't have that information.</p> <p>5 There wasn't any intelligence on him for that. There</p> <p>6 was some historical stuff from previous sentences, but</p> <p>7 that is not relevant enough to submit someone to a full</p> <p>8 search.</p> <p>9 Q. Is it something which comes to your attention quite</p> <p>10 often, that a prisoner might be in unlawful possession</p> <p>11 of mobile phones?</p> <p>12 A. Yes.</p> <p>13 Q. Right. So that is not something particularly unusual</p> <p>14 within the prison system?</p> <p>15 A. No, the intel is usually more specific but, yes, we get</p> <p>16 lots of intel about prisoners suspected of using a phone</p> <p>17 or having possession of phones, yes.</p> <p>18 THE CHAIRMAN: Is that sometimes based on specific</p> <p>19 information and sometimes based on the inference to be</p> <p>20 drawn from the fact that they are not using public</p> <p>21 phones?</p> <p>22 A. Yes, so we used to do a monthly synopsis of PIN phone</p> <p>23 printouts so we would get a list of every prisoner who</p> <p>24 had hardly used the phone that month. That would build</p> <p>25 an intelligence picture about who they are contacting.</p> <p style="text-align: center;">Page 128</p>

<p>1 Once you correspond that with how many visits they had 2 had or how many legal visits they had had, how are they 3 arranging all these visits if they are not using the 4 prison phone, our system. So it builds a picture and 5 allows us to interrogate some data a bit more rigidly. 6 THE CHAIRMAN: What was the state of information which you 7 had from those sources at about the time Ms Blackwell is 8 asking whether you commissioned the search of his cell, 9 and if not why not? 10 A. Because he had only been in custody -- he only came in 11 at the end of October. You would be looking at 12 a three-month picture to gain that information and he 13 hadn't been there long enough. 14 THE CHAIRMAN: If somebody didn't use the phone much for 15 a few weeks, that of itself wouldn't normally or 16 wouldn't lead without more to a cell search? 17 A. Correct, sir, yes. 18 THE CHAIRMAN: Thank you. 19 MS BLACKWELL: Would your decision to have searched him and 20 his cell to see whether he had a mobile telephone have 21 been different if you had have known that there had been 22 an aborted attempt to spring him on 29 October? 23 A. Yes, because he would have been based on the E list and 24 that would have automatically generated a full cell 25 search, so, yes.</p> <p style="text-align: center;">Page 129</p>	<p>1 Q. Thank you. 2 Finally, you are aware, I have no doubt, that 3 following the incident that took place on 11 December, 4 the National Offender Management Service, NOMS, 5 commissioned and received an internal report that was 6 prepared by Brian Pollett and Carolyn Lund. Have you 7 had an opportunity to read that? 8 A. I have this week. It is the first time I have read it, 9 first time I have seen it. 10 Q. We are just going to look at some aspects of it together 11 now. Mr Coates, please could you put up HMP25 at 12 page 3. 13 This is the executive summary. 14 A. Yes. 15 Q. If we look from paragraph 1.3, this is what happened 16 after the meeting. 17 A. Okay. 18 Q. "Mr Nichols informed Emily Martin, deputy governor of 19 HMP Wormwood Scrubs, about the meeting with DI Nichols 20 ..." 21 I think that should be DI Murray. 22 A. Typo, yes. 23 Q. "... immediately after they had taken place. Ms Martin 24 informed Gary Monaghan, governor of HMP Wormwood Scrubs, 25 after the second meeting on 8 December.</p> <p style="text-align: center;">Page 130</p>
<p>1 "Mr Monaghan mistakenly assumed that the police 2 operation had been approved by a senior official in NOMS 3 headquarters. He therefore allowed the escort of 4 Mr Eren and Mr Amoyaw-Gyamfi to proceed on 5 11 December 2015 without any additional precautions." 6 According to your evidence today, that cannot be 7 right, can it? 8 A. No, that is right, and I spoke to -- Mr Pollett 9 interviewed me as part of this investigation as 10 a witness. And he repeated, similar to what Mr Monaghan 11 has said there, and he had stated that Mr Monaghan said, 12 "If Peter told me that NOMS were not informed, then 13 I misheard that". 14 Q. So you contend that you told him? 15 A. Absolutely, 100 per cent. 16 Q. No doubt about that? 17 A. No doubt whatsoever. 18 Q. According to what you know, Mr Monaghan's explanation is 19 that he must have misheard you? 20 A. Yes, he said, "I have misunderstood. If that is what 21 Pete said he said, then Pete would have said it". 22 Q. Right, so the misunderstanding has occurred within 23 Mr Monaghan's own mind? 24 A. Yes. 25 Q. 1.5:</p> <p style="text-align: center;">Page 131</p>	<p>1 "Mr Monaghan informed Nick Pascoe, the deputy 2 director of custody for the London region, of the 3 situation after the escort vehicle had left Wormwood 4 Scrubs. This was the first time that any NOMS senior 5 staff outside the prison had been told about the police 6 operation." 7 That would accord with what you told us? 8 A. Yes. 9 Q. "The protocols for the sharing of intelligence between 10 the Metropolitan Police and NOMS were not used on this 11 occasion. NOMS' approval for the police operation was 12 not sought at a senior HQ level in advance of 13 11 December." 14 Were you aware in December 2015 of the protocols for 15 the sharing of intelligence between the Met and NOMS? 16 A. Yes, I was aware of their existence. Had I read them? 17 No. 18 But yes, I was aware of them. We receive -- as 19 heads of security, we would receive annexes from some of 20 those documents and protocols that we would need, but 21 the protocols are at such a high level, it wouldn't 22 filter down to my level to be fair. 23 Q. Right. 24 In your experience, was there a healthy relationship 25 in terms of information sharing between the prison, NOMS</p> <p style="text-align: center;">Page 132</p>

1 HQ and the law enforcement agencies?
 2 **A. I can't really comment on HQ, because that was not**
 3 **something I was involved in. What I can say is from the**
 4 **London region prison intel unit run by Steve Mayes, our**
 5 **working relationship was extremely healthy, it was**
 6 **brilliant it was a two-way street and we had open**
 7 **communications, we had respect for each other. Yes, our**
 8 **relationship, working relationship was really healthy.**
 9 **We had lots going on. Yes, it was really healthy,**
 10 **really good.**
 11 Q. From what you have said earlier in your evidence, was
 12 the request made to you by Mr Murray that you treat this
 13 information confidentially an unusual request to be made
 14 of you?
 15 **A. I think because the scale of it, yes.**
 16 Q. Because of the?
 17 **A. Scale of it.**
 18 Q. The scale of it?
 19 **A. Yes. There has been other requests in the past, saying**
 20 **can you just sit on this information just for a day or**
 21 **two until we get some finer details, which is fine, but**
 22 **for it not to go outside of the prison into**
 23 **headquarters. Yes, it is the first time I had**
 24 **experienced it.**
 25 Q. It was the first time you had experienced it, in how

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1 should have included details of both the background to
 2 the case and of any previous police adviser section
 3 applications."
 4 That is PAS applications?
 5 **A. PAS, yes.**
 6 Q. PAS, thank you:
 7 "The full briefing would have enabled the potential
 8 risks for NOMS and their associated partners, in this
 9 case the escort contractor, to be properly recognised
 10 and appropriately managed both in the short and long
 11 term."
 12 Do you agree with that?
 13 **A. Yes, in short. (Pause)**
 14 **Yes, I am not sure the governing governor would be**
 15 **included in that meeting. He would rely on me to tell**
 16 **him -- he wouldn't attend that meeting, to be fair.**
 17 Q. That conclusion isn't accurate in terms of the briefing
 18 of the governing governor?
 19 **A. The governor would want a synopsis from me about what is**
 20 **going on, but he wouldn't --**
 21 Q. He wouldn't be present?
 22 **A. No. No. I think just to put that into context, if we**
 23 **go back to the category A section, the governing**
 24 **governor would not be involved at any point whether**
 25 **a prisoner is category A or not. He would have no input**

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1 many years working in the role that you had?
 2 **A. Hmm, I had been in that role five years by then, maybe.**
 3 Q. So from 2010?
 4 **A. 2009 I went to Wormwood Scrubs.**
 5 Q. Have you ever since December 2015 been asked to act in
 6 that way again?
 7 **A. No.**
 8 Q. Could we go to page 13, please.
 9 Just going to look at page 12, please. Thank you.
 10 At what should have happened:
 11 "There should have been a recognition by the senior
 12 investigating officer in charge of the
 13 Metropolitan Police operation and by those aware at the
 14 London Regional Prison Intelligence Unit that the
 15 possible use of firearms made this incident both high
 16 profile and high risk. Which would require the briefing
 17 to those of sufficient seniority within NOMS. This
 18 would have ensured that the existing protocols for
 19 sharing and managing intelligence between the Met and
 20 NOMS were followed."
 21 Do you agree with that?
 22 **A. Yes.**
 23 Q. "The police SIO should have followed up the initial
 24 meeting with the head of security at HMP Wormwood Scrubs
 25 with a full briefing for the governing governor. This

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1 **whatsoever.**
 2 Q. That would happen below his level of interest?
 3 **A. It would come to me and then go straight to NOMS. It**
 4 **would bypass him, he wouldn't even be aware.**
 5 MS BLACKWELL: That is very helpful, thank you.
 6 Sir, that concludes my questioning.
 7 Do you have any questions at this stage, before I am
 8 going to ask for us to have a short break.
 9 Questions from THE CHAIRMAN
 10 THE CHAIRMAN: Yes, I have just one.
 11 Would it surprise you that a police officer who was
 12 experienced in intelligence matters would regard telling
 13 you about what was going on as compliance with the
 14 protocol which required NOMS to be notified?
 15 **A. Yes, I can't imagine that. They would know that -- each**
 16 **individual prison has as an individual entity that it**
 17 **would need to be escalated outside the establishment.**
 18 THE CHAIRMAN: Thank you.
 19 MS BLACKWELL: Is that a convenient moment then to take
 20 a short break?
 21 THE CHAIRMAN: Yes.
 22 I don't know how much further evidence there is this
 23 afternoon.
 24 MS BLACKWELL: Well, that is very much within a debate
 25 between myself and the other core participants. We do

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1 have a witness. The witness may be significantly
 2 shorter than we had originally anticipated and I will
 3 use this time to make arrangements for the rest of this
 4 afternoon.
 5 We also have some evidence to be read, so our time
 6 will not be wasted.
 7 THE CHAIRMAN: I am sure it will not. Shall we say
 8 15 minutes?
 9 MS BLACKWELL: Yes, please.
 10 THE CHAIRMAN: Is that sufficient for everybody?
 11 Ms Kaufmann?
 12 MS KAUFMANN: Yes, I was just clarifying if we will still
 13 have an opportunity to ask --
 14 MS BLACKWELL: Yes, I was going to say if it transpires that
 15 we don't need Mr Nichols any further then I will pass
 16 the message on, but it rather looks like we might do.
 17 I am going is to ask for you to remain, Mr Nichols,
 18 just during the break.
 19 **A. Fine.**
 20 MS BLACKWELL: Thank you.
 21 THE CHAIRMAN: Thank you.
 22 Don't stand around on my account.
 23 (3.13 pm)
 24 (A short adjournment)
 25 (3.26 pm)

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1 information on to the Mercury record?
 2 **A. That would have gone from -- depending on the**
 3 **originating source would have gone to the prison intel**
 4 **unit and that would have gone to the PIO, who was the**
 5 **police officer based inside the establishment and they**
 6 **would have uploaded it onto a Mercury report onto our**
 7 **systems.**
 8 Q. That was not something which you would have been
 9 personally involved in?
 10 **A. No.**
 11 MS BLACKWELL: Thank you.
 12 Questions from MS KAUFMANN
 13 MS KAUFMANN: Thank you, sir.
 14 We heard yesterday, Governor Nichols, from
 15 Mr Murray, and when he explained to us his reason for
 16 coming to see you on 13 November, he said, and I am
 17 going to read from his transcript:
 18 "During the course of enquiries, I had been advised
 19 that there were corruption issues around Serco and
 20 around the prison. That was why we went to speak to
 21 Mr Nichols, as he was, I believe, the discipline and
 22 corruption lead for the prison."
 23 Do you recall him speaking to you about concerns
 24 relating to corruption within Serco?
 25 **A. Yes, in part. Yes, concerns with Serco but not in**

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1 THE CHAIRMAN: Yes.
 2 MS BLACKWELL: Thank you, sir.
 3 I have discussed matters with the core participants
 4 and the only questions which are going to be asked are
 5 by my learned friend, Ms Kaufmann.
 6 She wishes to ask questions on three areas.
 7 Firstly the possible corruption in relation to the
 8 Serco organisation.
 9 Secondly, the lack of a search for a mobile phone.
 10 Finally, the provision of information or lack of
 11 provision of information relating to firearms.
 12 I have agreed that those areas of questioning are
 13 relevant and she should be allowed permission to do
 14 that.
 15 THE CHAIRMAN: Very good.
 16 Further questions from MS BLACKWELL
 17 MS BLACKWELL: Before I do, however. There is one final
 18 question which I would like to ask you, Mr Nichols.
 19 The MPS have today provided a Mercury record dated
 20 February 2011, recording some of the form of words of
 21 the -- sorry, 2 November, not February 2011.
 22 2 November, recording some of the form of words that has
 23 been lifted from the CRIMINT that we have looked at
 24 earlier in your evidence.
 25 Are you able to tell us who would have entered that

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1 **relation to corruption. He was concerned with possible**
 2 **leaks. But the word "corruption" was never mooted**
 3 **about. He was more concerned about the more people that**
 4 **knew about this operation that he was concerned about**
 5 **leaks, not necessarily corruption.**
 6 Q. Can you expand upon that, what was his concern in
 7 relation to Serco and leaks?
 8 **A. That if Serco was informed of the operation, and that**
 9 **other people within Serco would find out and potentially**
 10 **compromise his investigation, or his operation.**
 11 Q. So it was about compromising the operation?
 12 **A. Yes, from what I am led to believe, he was talking**
 13 **about. Corruption was never mentioned.**
 14 Q. Thank you.
 15 Can I move on to the second topic that was indicated
 16 I would be asking you about. That relates to the search
 17 of mobile phones.
 18 You explained to us at the outset, and we saw the
 19 email from DI Mayes, that because of those concerns
 20 about how matters might be compromised on the police
 21 side, he asked you not to raise security in any way. My
 22 question to you is whether or not, in fact, the decision
 23 not to search for mobile phones, because we have heard
 24 the evidence that it was quite clear from the
 25 intelligence you had that he may have access to mobile

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<p>1 phones, whether that decision was actually as a result 2 of that request on the part of DI Mayes? 3 A. No, it wouldn't have been because an individual having 4 access to a phone doesn't mean it is in his cell or in 5 his possession. He could have -- you know, someone else 6 could be holding that phone for him on a different 7 landing. So if the intel was specific that he had 8 a phone in his cell, or on his person, then we probably 9 would have searched him. But the intel was that he had 10 access to a phone. We had no idea potentially where 11 that phone was going to be held. 12 Q. Can I then move on to the information that the police 13 gave to you, or didn't give to you, about, firstly the 14 operation on 29 October. 15 You explained to Ms Blackwell that the police never 16 told you that there had been an attempted -- or there 17 had been a plan that was aborted -- 18 A. No. 19 Q. -- to facilitate Mr Eren's escape on the 29th. You were 20 never told about that. You explain that, had you been 21 told about that, your duties in relation to security 22 would have overridden the police concerns and you would 23 have put him on the escape list. 24 It necessarily follows, doesn't it, that your having 25 not been told anything about the 29 October plan also</p> <p style="text-align: center;">Page 141</p>	<p>1 means you were not told that the police believed 2 firearms would be involved in the execution of that 3 plan? 4 A. They told me firearms would be involved, yes. 5 Q. Not on the 29th? 6 A. Not on the 29th, no. 7 THE CHAIRMAN: I think it follows as night follows day, if 8 you didn't know about the abortive breakout -- 9 A. I knew nothing about that. 10 THE CHAIRMAN: -- on 29 October, you didn't know that it had 11 involved firearms. 12 A. Absolutely not, no. 13 MS KAUFMANN: In relation to the forthcoming 11 December 14 plan, you knew it would be an armed operation, as 15 I understand it? 16 A. Yes. 17 Q. But did you know, and did the police tell you, that it 18 was believed that those who would be attempting to 19 execute the escape plan to get, to spring as it were, 20 Mr Eren, would themselves be using firearms? 21 A. I was led to believe that, yes, they would. 22 Q. You were led to believe that? 23 A. Yes. 24 Q. My question to you then is this: that one of the 25 concerns that leads to people being categorised as</p> <p style="text-align: center;">Page 142</p>
<p>1 category A, is it not, is that individuals have 2 associates who themselves have access to firearms and 3 those may be used in facilitating their escape? That is 4 a basis for category A security categorisation, yes. So 5 why then, if you had that knowledge, did you not do what 6 you indicated you might have done, which is to go 7 straight to the directorate of high security and make 8 sure that they knew about this plan and this 9 individual -- 10 A. It was flagged up on his entry into custody and then 11 there would have been a further report up to HQ of the 12 cat A section after that meeting on 30 October. 13 Q. No, I am asking a different question. 14 What was flagged up when he came into prison on the 15 30th was that he had been involved in firearms offences. 16 But the intelligence you were being given from the 17 police was that, on 11 December, it was believed that 18 an operation to spring him from prison would be 19 executed, by individuals who would be using firearms. 20 That is the sort of intelligence I think you have 21 just agreed -- 22 A. Yes. 23 Q. -- that would ordinarily result in somebody being 24 category A'd, as it were, and even high risk 25 category A'd, so my question to you is why, given that</p> <p style="text-align: center;">Page 143</p>	<p>1 intelligence, did you not make sure that this went up to 2 the directorate of high-security prisons? 3 A. Because, 1, they had asked us not to escalate it outside 4 the establishment, and, secondly, I took it to my 5 governing governor. 6 Q. You said before that taking it to your governing 7 governor would not be something that you would do in 8 relation to a category A security classification? 9 A. No, and whether we should refer this incident outside of 10 the establishment. The police have requested us not to. 11 I am not really in that position to make that decision, 12 so I went to my governing governor to say look, this is 13 the information they have given me, I think HQ need to 14 be aware of this, it is up to you. 15 Q. Just to clarify, again, to try and understand the 16 distinction, between that intelligence in relation to 17 13 December and the intelligence that you were not given 18 in relation to 29 October event, because your position 19 in relation to 29 October was, you have indicated, that 20 had you known about that, then you would have put him on 21 the E list? 22 A. Yes. 23 Q. Irrespective of what the police were asking you to do? 24 A. Yes, because he still would have gone to court from 25 Wormwood Scrubs, he wouldn't have moved locations, moved</p> <p style="text-align: center;">Page 144</p>

1 **jails, as an E list prisoner.**
2 Q. No, but you nonetheless had that intelligence in
3 relation to 11 December?
4 A. Yes.
5 Q. They were telling you exactly that, that is what was
6 going to happen on 11 December, so why did that not make
7 you put him on the E list?
8 A. **Because nothing was -- they hadn't confirmed the plan.**
9 **It was all potential, which is why I raised it up to**
10 **Emily Martin and then we decided that until they confirm**
11 **that anything was going to happen we wouldn't raise it**
12 **up. And when they did confirm it on the 11th then**
13 **I raised it with Gary Monaghan.**
14 Q. But you had it confirmed on the 8th?
15 A. **8th of what?**
16 Q. 8 December, you had it confirmed.
17 A. **Yes, which is when we raised it up to Gary Monaghan,**
18 **yes.**
19 Q. But you didn't put him on the E list?
20 A. **No, because the risk was outside the establishment. He**
21 **wasn't going to escape from Wormwood Scrubs. So if**
22 **I had put him on the E list at Wormwood Scrubs, there**
23 **was no intelligence that he was going to try and exit**
24 **the gate, try and get out of his cell, take a member of**
25 **staff hostage, grab a set of keys. There was no intel**

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1 connected to Ms Kaufmann's question.
2 THE CHAIRMAN: Yes.
3 Questions from MR BUTT
4 MR BUTT: You have told the chairman that had you known
5 about the earlier potential aborted escape plot, you
6 would have put him on the E list. You then told
7 Ms Kaufmann that even though you knew there was going to
8 be potential escape plot in the future, you waited until
9 that was confirmed and then you spoke to your governing
10 governor about it.
11 Does it come to this, that had you known about the
12 29 October previous aborted escape plot, you would have
13 done the same, which is spoken to your governing
14 governor in order to see what action he would take?
15 A. **No.**
16 **There are two reasons for that.**
17 **So to put a prisoner on the escape list, you do it**
18 **for an initial 28-day period, which allows you to gather**
19 **further intelligence from various sources and then you**
20 **review that individual at 28 days and then you make that**
21 **decision whether he will remain on the escape list or**
22 **whether he is taken off, because the information or the**
23 **risk has been reduced significantly.**
24 **In addition to that, there is two types of escape**
25 **risk which I probably never made clear earlier on.**

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1 **to say that he was a risk whilst he was in custody at**
2 **Wormwood Scrubs. The risk was purely in transit to**
3 **court, which is why I went to Gary to escalate it**
4 **outside. There was no risk inside the jail, and his**
5 **custodial behaviour and record would support that. He**
6 **was not a risk to prison staff or the prison. It was**
7 **outside the risk was.**
8 THE CHAIRMAN: Yes.
9 MS KAUFMANN: Those are all my questions, thank you.
10 THE CHAIRMAN: Thank you very much.
11 MS MCNEILL: Sir, I am not Ms Blackwell, but that concludes
12 the questioning certainly from the core participants and
13 for ourselves for this witness, he can be released.
14 THE CHAIRMAN: Thank you very much for assisting.
15 MR BUTT: I am so sorry, sir, I am saying to my learned
16 friend, I am just a little unclear on that point and
17 I wonder whether I can either ask your counsel to ask
18 a question or I could ask a question or I could be
19 refused permission to do either.
20 I know that is not really in your nature, but I am
21 very happy to take direction.
22 Can I speak to Ms Blackwell for a moment, sir?
23 THE CHAIRMAN: Of course you can.
24 Hang on a moment, please.
25 MR BUTT: Thank you very much. I have been asked just to --

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1 **There is an escape list where the person inside prison**
2 **would wear different clothes and would be treated**
3 **differently in terms of levels of searches and movement,**
4 **and there is an escape risk alert for anyone who goes**
5 **outside of custody, which is what I did on that**
6 **30 October, and increased his cuffing arrangements for**
7 **escorts outside of prison. So there is escape list for**
8 **inside and then there are E list alerts for an external**
9 **move, which is what we did on the 30th, so that he would**
10 **go double cuffed and he would go with three staff. That**
11 **was the risk at the time because the risk was outside**
12 **the prison but I wouldn't -- Gary Monaghan, the**
13 **governor, would not need to sign off an escape list**
14 **prisoner in custody, it would be down to my direction.**
15 Q. If you had heard the 29 October potential escape was
16 going to be again on transit from court to the prison,
17 would you have put him on the external escape list or on
18 the internal, if that is what it is called, escape list?
19 A. **I would put it on the external, because there was no**
20 **intelligence to support that he would escape from prison**
21 **custody in the prison.**
22 Q. What would the practical effect of being on the external
23 escape list be?
24 A. **That it would be flagged up on his NOMIS and on his**
25 **Mercury, so at any point he was due to be moved outside**

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<p>1 of the establishment, the dispatching manager would see</p> <p>2 all his alerts, whatever they may have been.</p> <p>3 Q. I think that is indeed what happened, isn't it?</p> <p>4 A. Yes.</p> <p>5 MR BUTT: Thank you.</p> <p>6 THE CHAIRMAN: Just a moment, I would like to clarify this,</p> <p>7 because it seems to be a change of emphasis in your</p> <p>8 evidence.</p> <p>9 A. Okay.</p> <p>10 Further questions from THE CHAIRMAN</p> <p>11 THE CHAIRMAN: You have told us that when you knew about the</p> <p>12 planned breakout from the van, which was to take place</p> <p>13 on 11 December, you put him on the escape risk alert</p> <p>14 list.</p> <p>15 A. No, he was put on that the 30 October.</p> <p>16 THE CHAIRMAN: Exactly, yes.</p> <p>17 You found out on 30 October about the plan to spring</p> <p>18 him en route for Wood Green on 11 December, right?</p> <p>19 A. Yes.</p> <p>20 THE CHAIRMAN: Or on the next court hearing, even if you</p> <p>21 didn't then know the date?</p> <p>22 A. Yes.</p> <p>23 THE CHAIRMAN: So you put him on the escape risk alert list</p> <p>24 on or about 30 October?</p> <p>25 A. Correct, sir, yes.</p> <p style="text-align: center;">Page 149</p>	<p>1 THE CHAIRMAN: When I asked you before and when Ms Kaufmann</p> <p>2 asked you before what would have happened if you had</p> <p>3 known that he had, on 29 October, been involved in</p> <p>4 an abortive attempt to spring him, you said that he</p> <p>5 would have immediately been put on the E list with all</p> <p>6 the bells and whistles that that would have entailed.</p> <p>7 A. That's correct, sir, yes.</p> <p>8 THE CHAIRMAN: I may have it wrong, but I took the</p> <p>9 impression from what you said to Mr Butt that, in fact,</p> <p>10 there would have been no difference, that it would have</p> <p>11 just been the escape risk alert list, which he was on</p> <p>12 anyway?</p> <p>13 A. You are absolutely right, sir.</p> <p>14 So if I had have -- if I had the information about</p> <p>15 the abortive escape on the 29th.</p> <p>16 THE CHAIRMAN: Yes.</p> <p>17 A. On the 30th I would have placed him on the E list, on</p> <p>18 an escape list within the prison, with whistles and</p> <p>19 bells.</p> <p>20 THE CHAIRMAN: Right.</p> <p>21 A. 28 days later, if I had had no further information, he</p> <p>22 would have been taken off that but remained on the</p> <p>23 external E list alerts.</p> <p>24 THE CHAIRMAN: Right.</p> <p>25 A. So it is an initial 28 days, so he would have been on it</p> <p style="text-align: center;">Page 150</p>
<p>1 for 28 days if I had had that information. If no</p> <p>2 further information about escaping from custody within</p> <p>3 Wormwood Scrubs, he would have come off on 28 November,</p> <p>4 but would have remained on the external in the escape</p> <p>5 list alert system.</p> <p>6 THE CHAIRMAN: The difference between the two lists is that</p> <p>7 if he is on the escape risk alert list, he doesn't know?</p> <p>8 A. Correct.</p> <p>9 THE CHAIRMAN: Unless and until he has, for example, to go</p> <p>10 to hospital?</p> <p>11 A. Exactly so.</p> <p>12 THE CHAIRMAN: But if he is on the E list, not only does he</p> <p>13 know, but everybody knows?</p> <p>14 A. Correct, sir.</p> <p>15 THE CHAIRMAN: Yes.</p> <p>16 Thank you.</p> <p>17 MS MCNEILL: Sir, I pause, I think that concludes this</p> <p>18 witness's evidence and he can be released.</p> <p>19 THE CHAIRMAN: Thank you.</p> <p>20 MS MCNEILL: I can confirm, sir, we are no longer intending</p> <p>21 to call DC Smith this afternoon and we will hopefully be</p> <p>22 in a position to update you with a proposal of how his</p> <p>23 witness evidence will be dealt with.</p> <p>24 THE CHAIRMAN: Everybody is content that he needn't be</p> <p>25 called?</p> <p style="text-align: center;">Page 151</p>	<p>1 MS MCNEILL: We have consulted all parties.</p> <p>2 Sir, we plan to use the rest of the afternoon to</p> <p>3 catch up on our reading if we can.</p> <p>4 THE CHAIRMAN: Yes.</p> <p>5 MS MCNEILL: If we can start, please, sir we are going to</p> <p>6 read the evidence of Catherine Samy, and can we display</p> <p>7 her statement at MPS833.</p> <p>8 Good start, sir.</p> <p>9 We will check her reference it is MPS3838 for her</p> <p>10 second statement, and I will summarise her first from</p> <p>11 our agreed note.</p> <p>12 THE CHAIRMAN: Yes.</p> <p>13 Evidence of MS CATHERINE SAMY (read)</p> <p>14 MS MCNEILL: She provided a statement to the inquiry which</p> <p>15 will be uploaded, dated 29 February 2016, so it is not</p> <p>16 in your bundle.</p> <p>17 Catherine Samy reported her black Audi A6 stolen</p> <p>18 from outside her home address during a burglary between</p> <p>19 26 and 27 August 2015. On 29 February 2016, she was</p> <p>20 shown a number of items that were recovered from inside</p> <p>21 the Audi on 11 December. They included a bicycle lock,</p> <p>22 a chain and a rucksack found inside the car. Those</p> <p>23 items did not belong to her.</p> <p>24 Her second statement, which we have on screen, and</p> <p>25 we can zoom, please, Mr Coates to the second paragraph.</p> <p style="text-align: center;">Page 152</p>

1 On 23 February 2021, Ms Sammy confirmed that the Audi
 2 did not have tinted windows in the front or rear of the
 3 car when she purchased it. She did not add any tint to
 4 those windows.
 5 Sir, that fact might become relevant in due course.
 6 THE CHAIRMAN: Yes.
 7 MS MCNEILL: The correct reference for her statement to be
 8 published on the website is MPS883.
 9 THE CHAIRMAN: Thank you.
 10 Evidence of MR JIM LYNCH (read)
 11 MS MCNEILL: Sir, we are going to move on to Jim Lynch, and
 12 with some trepidation, I say his reference is MPS785.
 13 Success.
 14 Witness statement dated 8 November 2015, which, sir
 15 for ease I am going to summarise the key five points to
 16 take from this statement.
 17 THE CHAIRMAN: Yes, please.
 18 MS MCNEILL: Jim Lynch is the hotel manager for the Amhurst
 19 Hotel, which is in N16. On 8 November 2015, one of his
 20 cleaners informed him she had found a black stabproof
 21 vest under the cupboard in one of the hotel rooms.
 22 Jermaine Baker had been staying in that room.
 23 So on 12 November 2015, Mr Lynch sent a message to
 24 the mobile number he had for Jermaine Baker, which ended
 25 in 023. It said:

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1 Again, sir, I am just going to summarise the key
 2 issues. Mr Coates, can we zoom out the text for anybody
 3 following, because it is quite hard to see on these
 4 screens.
 5 THE CHAIRMAN: The relevance of the last statement was just
 6 to tie in with the evidence of the use of Mr Baker's
 7 phone.
 8 MS MCNEILL: Exactly, sir, exactly right.
 9 Sir, Mr Neal is a prison officer and he confirms
 10 that Izzet Eren was detained at HMP Thameside between
 11 15 October 2015 and 29 October 2015. So that is prior
 12 to the court appearance at which you have heard of the
 13 aborted attempt, sir.
 14 During that stay at Thameside the records show that
 15 Izzet Eren was visited by Ozcan Eren. In addition,
 16 HMP Thameside has a personal identifying number phone
 17 system, you have heard some evidence about those today,
 18 sir. The prisoner buys credit with their unique PIN
 19 number. Details of all phone calls made by each
 20 prisoner are recorded. Mr Neal has checked the prison
 21 records and found that during his time at Thameside,
 22 Izzet Eren made one phone call on the prison system to
 23 his legal representative. No other telephone calls were
 24 made.
 25 Mr Neal described this as "quite unusual behaviour"

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1 "I need to know who left something under the
 2 wardrobe. I hope you are fine."
 3 He never received a reply from Jermaine Baker, he
 4 tried calling him a few times and left him a few
 5 voicemails.
 6 We are going to turn, sir, to the evidence of
 7 DC Maria Cosham, who is going to help us with the purchase
 8 of the imitation firearm. Her statement is MPS4498.
 9 Sir, I don't think that statement is available on
 10 Trial Director. I do have the right reference this
 11 time, so we will pause to see if it can be brought up
 12 and if not we can read that statement tomorrow morning.
 13 It is not a problem, Mr Coates, we will read that one
 14 tomorrow morning.
 15 Sir, so you know, DC Maria Cosham has done some
 16 research for us to identify the date on which the
 17 imitation firearm was purchased, so we can come back to
 18 it.
 19 THE CHAIRMAN: That is the imitation firearm that was found
 20 in the Audi after the shooting?
 21 MS MCNEILL: That's right, yes.
 22 Evidence of MR EDWARD NEAL (read)
 23 MS MCNEILL: Turning then hopefully to Edward Neal, his
 24 statement is MPS886.
 25 Thank you.

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1 for a prisoner. Especially as the call was to a legal
 2 adviser. No social phone calls to family or friends
 3 were made. This would he said in Thameside lead
 4 intelligence staff to believe the prisoner had access to
 5 a mobile phone, as Izzet Eren had arranged his own
 6 visits on the system, he would have needed to contact
 7 his visitors somehow to inform them of the date and
 8 times of the visit.
 9 THE CHAIRMAN: It might be helpful, if it can be done, for
 10 a statement to be obtained as to whether that
 11 information would have accompanied Izzet Eren when he
 12 went to Wormwood Scrubs.
 13 MS MCNEILL: Sir, we can look into it. I should
 14 emphasise --
 15 THE CHAIRMAN: The reason I ask is because Mr Nichols said
 16 that, really, based on a few weeks, very limited use of
 17 public phones wouldn't give sufficient cause for concern
 18 to warrant a search. And he would look for a pattern,
 19 I think that was the word he used.
 20 Now, query whether, if as far as Wormwood Scrubs was
 21 concerned, this was the same pattern they were aware of
 22 the limited use of the phone whilst he was at Thameside,
 23 it, as it were, ought to have set alarm bells ringing.
 24 MS MCNEILL: Sir, we can look into that and I must
 25 emphasise, not for your benefit, for anyone watching

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<p>1 that the statement of Edward Neal and the interrogation 2 of the Thameside PIN system was carried out after the 3 fact as part of the police investigations. 4 THE CHAIRMAN: Yes, so the answer to my question is probably 5 no. 6 MS MCNEILL: Probably no, but I can't -- 7 THE CHAIRMAN: They wouldn't have known that it was part of 8 a pattern? 9 MS MCNEILL: That is my anticipation but we shall check. 10 Evidence of MR ANDREW STILL (read) 11 MS MCNEILL: Sir, if we turn to Andrew Still, and his 12 statement I hope is at MPS891. 13 Thank you. 14 He gives a witness statement dated 20 April 2016. 15 Again can we just zoom out until the top of the table, 16 please, Mr Coates. 17 Thank you. 18 Mr Still is a senior prison officer at HMP Belmarsh. 19 Izzet Eren was an inmate at Wormwood Scrubs between 20 29 October 2015, as we know, and 11 December 2015. 21 During that period, Izzet Eren was visited by 22 Elif Eren, Mehmet Eren and Ozcan Eren on 23 November. 23 So we have one visit, sir. 24 25</p> <p style="text-align: center;">Page 157</p>	<p>1 Evidence of MR JUSTICE SWEENEY (read) 2 MS MCNEILL: Finally, sir, if I can turn to the evidence of 3 the honourable Mr Justice Sweeney, that is going to 4 involve a little bit more reading. 5 THE CHAIRMAN: Yes. 6 MS MCNEILL: Mr Coates, can we display his statement at 7 CTS8, please. 8 I am going to, sir, read this statement in full. 9 THE CHAIRMAN: As you wish. 10 MS MCNEILL: If you bear with me and Mr Coates if you could 11 zoom it out so everybody can follow along. 12 The Honourable Mr Justice Sweeney KT, judge in 13 charge of the terrorism list as he was at the time the 14 statement was prepared: 15 "I have been contacted on behalf of the coroner, HHJ 16 Clement Goldstone Queen's Counsel, who is to conduct 17 an inquest into the death of a man called Jermaine Baker 18 who was shot by the police in the street not far from 19 Wood Green Crown Court on Friday, 11 December 2015 -- 20 whilst I understand it was alleged he was getting ready 21 with others to effect the escape of a prisoner, (or 22 possibly two prisoners) who was/were being driven to the 23 court in a prison van in order to be sentenced in 24 respect of very serious offences: 25 "The police operation on 11 December was preceded by</p> <p style="text-align: center;">Page 158</p>
<p>1 a request, as a contingency, for an overt armed unit to 2 be able to deploy (if necessary) at the front door of 3 Wood Green Crown Court and for two covert armed officers 4 to be deployed within the precincts of the court 5 building: 6 "The coroner wishes me to provide all information 7 that I have in connection with the authorisation of that 8 request: 9 "The then procedure in relation to such requests 10 ..." 11 Which was contained in the 2015 Criminal Practice 12 Direction at 3M. Sir, you have been through that to 13 some extent, it is in your bundle of policy documents. 14 THE CHAIRMAN: Yes. 15 MS MCNEILL: "... was that the request had to be made in 16 writing and would be considered first by the relevant 17 lead presider, which I then was in the south-eastern 18 circuit, and if recommended by the lead presider would 19 then be considered and authorised or not by the senior 20 presiding judge, and that was then Lord Justice Gross. 21 "The first approach by the police was made orally by 22 a detective inspector at a meeting with the court 23 operations manager at Wood Green on Monday, 24 7 December 2015[, sir you heard that was Detective 25 Inspector Murray] when it was explained that the police</p> <p style="text-align: center;">Page 159</p>	<p>1 had good intelligence that there was going to be 2 an attack on the prison van bringing the two prisoners 3 to the court for sentence on Friday, 11 December. 4 "The matter was brought to my attention later that 5 day and I sought a steer from the senior presiding 6 judge. Thereafter I required an officer of ACPO rank 7 [Association of Chief Police Officers] to provide 8 a written document as to the exact role of the court of 9 sentence in the proposed police operation and to provide 10 an assessment of the risks involved." 11 THE CHAIRMAN: For the record, ACPO stands for? 12 MS MCNEILL: Association of Chief Police Officers. 13 THE CHAIRMAN: Thank you. 14 MS MCNEILL: "I also indicated that I required a meeting 15 with the ACPO rank officer at 2.00 pm the following day. 16 The police were also directed to the template for the 17 making of firearms requests. 18 "In the morning of Tuesday, 8 December 2015, the 19 police, using the template, duly provided a detailed 20 written request." 21 That was exhibit NS/1. 22 Sir, I propose to bring it up, it is at CTS9 and it 23 is page 9 to 12 of that document. So if you can do them 24 one at a time, please, Mr Coates. 25 Sir, I don't propose to read out the contents</p> <p style="text-align: center;">Page 160</p>

1 because this will be put to the witnesses involved in
 2 preparing it.
 3 THE CHAIRMAN: In particular Mr Williams.
 4 MS MCNEILL: Mr Williams tomorrow and Commander Duncan Ball
 5 will come next week as well.
 6 THE CHAIRMAN: Thank you.
 7 MS MCNEILL: Yes, so it is page 9. Over to page 10, please,
 8 Mr Coates. Page 11 and, finally, page 12. Sir, I flag
 9 that this is name and rank of officer making the
 10 application was at this time Commander Duncan Ball, MPS
 11 specialist crime and operations. And he is an ACPO rank
 12 officer.
 13 THE CHAIRMAN: Yes.
 14 MS MCNEILL: Can we go back to the witness statement,
 15 please, CTS8, Mr Coates.
 16 Mr Coates, we are going to pick up at the fourth
 17 paragraph from the bottom, if you could zoom out.
 18 Thank you:
 19 "That afternoon I held a meeting attended by
 20 Jo Clow, who was then the south-east regional listing
 21 coordinator, with DCS Manson, who was in charge of the
 22 Met Police organised crime command and was representing
 23 Commander Ball, who was then in command of gangs and
 24 organised crime, specialist crime and operations at the
 25 Met and FE16."

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1 judge] that the operational arrangements set out in the
 2 request needed to be amended to reflect the discussion
 3 that I had had with police. In particular, as to the
 4 circumstances in which armed officers would be deployed
 5 outside the court at Wood Green and the need for a quiet
 6 firearms survey of the interior of the court building
 7 before 11 December. He further indicated that in [over
 8 the page, thank you, can we have the top half, please,
 9 Mr Coates] the event of that all being done, he was very
 10 likely to grant permission for both armed officers to be
 11 outside the court and two covert armed officers to be
 12 inside the building. Jo Clow passed that on to the
 13 police that evening in an email.
 14 "On Wednesday, 9 December the police forwarded
 15 a revised written request (copy now marked NS/2)."
 16 Mr Coates, can we look at CTS9, page 17 for that
 17 copy of the form. Thank you. It is page 1, and over to
 18 page 2.
 19 Over again, to page 3. And, finally, page 20.
 20 Sir, I think at this point we have extra detail in
 21 the top box talking about the deployment of the overt
 22 officers. It says:
 23 "Added at box 9:
 24 "The case officers of the court will be unarmed."
 25 10:

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1 Sir, is Neil Williams, he no longer requires that
 2 cipher.
 3 THE CHAIRMAN: Yes.
 4 MS MCNEILL: "I do not recall whether I made any notes at
 5 the meeting but cannot find any now. However, I still
 6 have a number of emails sent and received from the
 7 process in which I have refreshed my memory and copies
 8 of which I can provide if required."
 9 Sir, we have the emails and a number of these will
 10 be explored with Mr Williams tomorrow.
 11 THE CHAIRMAN: Yes.
 12 MS MCNEILL: "At the meeting I indicated that in the event
 13 that the van was not attacked prior to its arrival at
 14 court, more needed to be done to secure the safety of
 15 all court users and that a firearms survey also needed
 16 to be carried out at the court. Later that day,
 17 I discussed the request with the senior presiding judge,
 18 who was generally supportive, including of the
 19 prisoners' case remaining at Wood Green, (which was not
 20 an approved firearms court)."
 21 Sir, Ms Blackwell explained yesterday that there is
 22 a list --
 23 THE CHAIRMAN: Within the rules.
 24 MS MCNEILL: Within the Criminal Procedure Rules.
 25 "However, he stressed [that's the senior presiding

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1 "We have added that box was blank in a previous
 2 version."
 3 11, it is still signed by a Commander Duncan Ball.
 4 Again, sir, we will be going through these with
 5 Mr Williams tomorrow.
 6 THE CHAIRMAN: Yes.
 7 MS MCNEILL: Back to the statement, please, CTS8, Mr Coates
 8 and page 2. Thank you:
 9 "In boxes 5 and 8 addressed the amended operational
 10 arrangements but made no reference to the quiet firearms
 11 survey of the interior of the court building. I queried
 12 the absence of any such reference and the police
 13 responded that the survey had in fact already been
 14 carried out on Monday, 7 December and that no further
 15 reconnaissance was required."
 16 You will remember Mr Murray said he had carried out
 17 that reconnaissance.
 18 THE CHAIRMAN: Yes.
 19 MS MCNEILL: "I amended box 6 of the request accordingly,
 20 with which the police agreed. I then had a meeting with
 21 the SPJ [the senior presiding judge] which was also
 22 attended by Pratibha Gogna from the senior presiding
 23 judge's office. At the conclusion of the meeting we
 24 both signed the final amended version of the request,
 25 (now marked NS/3) with the senior presiding judge making

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<p>1 his signature." 2 Mr Coates, we are going to look at NS/3 at MPS3705. 3 Thank you, over the page, please, Mr Coates. Over 4 the page again, Mr Coates. We see additional 5 information added in box 6, which we will go through 6 tomorrow about the covert reconnaissance carried out. 7 Then to the final page, still signed by 8 Commander Ball. Is there one more, page, Mr Coates? 9 Thank you. 10 Back to the statement, page 2: 11 "In the afternoon of 10 December 2015 Jo Clow 12 forwarded the following message from me to the police, 13 'Just to confirm all formalities completed at this end. 14 As they will understand, the senior presiding judge's 15 consent is limited to the Crown Court end of the 16 equation'. 17 "Sentence was listed for 2pm on 11 December 2015. 18 As I understand it, before/whilst the relevant prison 19 van was on its way to the court, the police had trailed 20 those who they believed were going to carry out the 21 attack on it to a street not far from the court. The 22 police then decided to move in to arrest them whilst the 23 van was still some miles from the court. It was then 24 that Jermaine Baker was shot. 25 "After that, and after I had liaised with the</p> <p style="text-align: center;">Page 165</p>	<p>1 sentencing Judge, HHJ Browne QC, it was decided that the 2 sentencing of the two prisoners, who had by then been 3 safely delivered to the court, should proceed at 4.30 pm 4 and against that background I recommended and the senior 5 presiding judge authorised that during the sentencing 6 hearing five officers could carry Tasers within the 7 precincts of court building and that two of those 8 officers could covertly carry firearms as well. The 9 sentence passed off without incident. There was some 10 further email traffic, including with the senior 11 presiding judge on 14 or 15 December. 12 "In 2016 Jo Clow, after consulting amongst others 13 with me and the senior presiding judge, provided much of 14 the above-mentioned material to the IPCC, which was then 15 investigating the shooting. This was accompanied by 16 a note from the senior presiding judge's office to the 17 effect that. 18 "(1) the judiciary were entirely content to release 19 to the IPCC the documents dealing with the application 20 for the authorisation for the presence of armed officers 21 within the precincts of Wood Green Crown. 22 "(2) it was however important that the context of 23 such applications was clearly understood by the IPCC, so 24 that there was no risk of misunderstanding in that 25 regard.</p> <p style="text-align: center;">Page 166</p>
<p>1 "(3) judicial approval is required for the presence 2 of armed police officers within the precincts of any 3 Crown Court or Magistrates' Court building and the 4 protocol for obtaining such approval was to be found in 5 the 2015 practice direction at part 3M. 6 "(4) the scope and limits of such authorisations are 7 clear and well understood. They relate, geographically, 8 to the precincts of the court in question, not beyond. 9 Moreover, and for the avoidance of any doubt, they do 10 not involve the judiciary in the conduct of police 11 operations or the deployment of police officers, beyond 12 giving consideration to the presence of armed officers 13 in the numbers and circumstances as proposed by the 14 police in the application for authorisation which the 15 judiciary either accept or reject. Still less, do the 16 judiciary have any control whatever over the conduct of 17 police operations. The focus of the judiciary is the 18 safety of court premises and those within the court 19 precincts." 20 Final page, please, Mr Coates: 21 "(5) in the Wood Green matter the judiciary, through 22 the senior presiding judge and the then lead presiding 23 judge for the south-eastern circuit, approved the 24 application for the presence of armed police officers 25 within the precincts of Wood Green Crown and, in the</p> <p style="text-align: center;">Page 167</p>	<p>1 circumstances, were satisfied that that the application 2 was justified although Wood Green is not one of the 3 designated courts for firearms deployment within 4 part 3M. Plainly, the judiciary has no further 5 involvement in the conduct of the police operation." 6 Sir, I don't think it is necessary to read the final 7 paragraph. 8 THE CHAIRMAN: No. 9 MS MCNEILL: Sir, that concludes our reading for today. 10 THE CHAIRMAN: Can I just summarise the effect of the rules? 11 MS MCNEILL: Certainly. 12 THE CHAIRMAN: The rules which governed the making and 13 consideration of this application did not or do not 14 require a statement made in witness form. 15 MS MCNEILL: No, sir. 16 THE CHAIRMAN: They do not require sworn evidence to be 17 given. 18 MS MCNEILL: No, sir. 19 THE CHAIRMAN: They do not require a transcript of that 20 evidence to be available. 21 MS MCNEILL: No, sir. 22 THE CHAIRMAN: And they do not require a judgment. 23 MS MCNEILL: No, sir. 24 THE CHAIRMAN: They require a judgment in the sense that 25 a judge has to decide whether or not to grant the</p> <p style="text-align: center;">Page 168</p>

<p>1 application, but they do not require a judgment which 2 can subsequently be considered for its terms. 3 MS MCNEILL: Quite so, no reasons provided at all. We do 4 have a copy, it is not necessary to bring up today, with 5 an ink signature from the senior presiding judge. 6 THE CHAIRMAN: It is not a rubber stamp, it is an ink -- 7 MS MCNEILL: Indeed, we have no documents with an ink 8 signature for the officer making the application, we 9 just have the electronic typed "Commander Duncan Ball". 10 THE CHAIRMAN: Thank you. 11 Housekeeping 12 MS MCNEILL: Sir, I am asked to bring one matter to your 13 attention in relation to disclosure before we rise. 14 THE CHAIRMAN: Yes. 15 MS MCNEILL: Just briefly I hope, I think it is more to make 16 everybody aware. 17 As you are aware, we have an expert report from 18 a Mr Mark Brown, who will give evidence about the 19 technical support unit's involvement in the deployment. 20 An expert report was shared with the MPS on Monday 21 morning and they were asked to provide their comments on 22 redactions within 24 hours. 23 THE CHAIRMAN: Yes. 24 MS MCNEILL: That has been extended to 4.00 pm today. 25 A quick note from Mr Moss indicates we have not had</p> <p style="text-align: center;">Page 169</p>	<p>1 a response. I flag it, sir because of course not only 2 the witnesses is attending rather soon, Steve Alexander 3 and other factual witnesses about the TSU and the Covert 4 Monitoring Post I believe are coming next week, so 5 hopefully Mr Butt can give us an update. 6 THE CHAIRMAN: Yes, Mr Butt. 7 MR BUTT: The report runs to over 80 pages, it is 8 a technical report dealing with complicated areas 9 relating to covert policing. We are doing absolutely 10 everything we can to progress this well beyond the 11 protocol and we have made and make no complaint 12 whatsoever. 13 THE CHAIRMAN: No. 14 MR BUTT: The position is, as of about a minute ago, that 15 the technical support unit have completed their work, 16 identifying areas that are sensitive and that has been 17 passed on to IRSC and someone as I speak is working to 18 enter those comments on to Relativity, so my hope is 19 that will all be done by tomorrow morning. 20 I don't know which individual is working and how 21 late he or she can work tonight, but that is the 22 earliest this could possibly be done and it will be done 23 as soon as it possibly can. 24 THE CHAIRMAN: I know you are doing your best and I am 25 certainly not at this stage going to crack a whip, but</p> <p style="text-align: center;">Page 170</p>
<p>1 there are clearly important considerations all round. 2 MR BUTT: We are very well aware of the impact it has on the 3 family, on your inquiry and we have impressed the 4 absolute urgency of this. 5 THE CHAIRMAN: I mean you are right to say that it is 6 a report of more than 80 pages, but, equally, it might 7 be said to be on the prolix side as far as the number of 8 pages is concerned. 9 MR BUTT: I will pass that on to the technical support unit. 10 Thank you, sir. 11 MS MCNEILL: Sir, only to square that circle as it were, 12 I will undertake that once those comments are received 13 by the inquiry's legal team we will work our way through 14 them as quickly as we can to make sure all the other 15 core participants get that report as quickly as we are 16 able. 17 THE CHAIRMAN: Thank you. 18 Anything else you want me to say about it at this 19 stage? 20 MS MCNEILL: Nothing further at this stage. That is 21 a helpful update from Mr Butt and I think that concludes 22 our business for today. 23 THE CHAIRMAN: If there anything that needs to be raised in 24 that regard before Mr Williams gives evidence 25 tomorrow --</p> <p style="text-align: center;">Page 171</p>	<p>1 MS MCNEILL: Sir, as you will be aware, Mr Williams is going 2 to come back and give evidence on a second occasion 3 relating to his movements on 11 December. I would 4 suggest that if anything arose from this report for him 5 it could be dealt with on his second attendance. 6 THE CHAIRMAN: Sorry, you misunderstood me. 7 MS MCNEILL: Did I misunderstand? 8 THE CHAIRMAN: Yes, I was saying if there is anything you 9 want to draw to my attention about the state of play in 10 relation to the reports, we can do so before we start 11 with the evidence of Mr Williams tomorrow, purely as 12 part of the housekeeping. 13 MS MCNEILL: Thank you, sir. 14 THE CHAIRMAN: Is it just Mr Williams tomorrow? 15 MS MCNEILL: Just Mr Williams tomorrow. 16 THE CHAIRMAN: Very good. Thank you very much. 17 Anything else anybody else wants to raise? 18 Good, thank you all. 19 (4.13 pm) 20 (The inquiry adjourned until 10.00 am the following day) 21 22 23 24 25</p> <p style="text-align: center;">Page 172</p>

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