

OPUS2

Manchester Arena PIR

Day 1

April 7, 2020

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1 Tuesday, 7 April 2020 1
 2 (10.00 am) 2
 3 (Delay in proceedings) 3
 4 (10.06 am) 4
 5 SIR JOHN SAUNDERS: Good morning. I'm sorry for the slight 5
 6 delay. This was caused by a very minor technical hitch. 6
 7 This is our first hearing by way of a video link. 7
 8 We will only do that when the hearing can't be held in 8
 9 any other way and it's necessary to ensure the progress 9
 10 of the inquiry to have it by video link. But a decision 10
 11 has to be made about this application by survivors as 11
 12 soon as possible, so there is no alternative but to 12
 13 carry out the hearing in the way that we are doing. So 13
 14 I will first of all invite Mr Greaney to address me on 14
 15 behalf of counsel to the inquiry. 15
 16 Submissions by MR GREANEY 16
 17 MR GREANEY: Thank you very much, sir. As everyone knows 17
 18 this the third preliminary hearing in the 18
 19 Manchester Arena Inquiry. The hearing is taking place, 19
 20 of course, in extraordinary times during a period of 20
 21 national, indeed international, crisis. By your ruling 21
 22 of 30 March this year, you explained with considerable 22
 23 regret that, as a direct consequence of that crisis, 23
 24 it would not be possible to start the oral evidence 24
 25 hearings on 15 June 2020, the day we planned to start 25

1

1 and would have met had we not been overtaken by events. 1
 2 Instead, sir, as you've ruled, we will start on 2
 3 7 September if it is safe to do so, but that date will 3
 4 need to be kept under review for reasons that are 4
 5 perfectly obvious. 5
 6 In your ruling, you emphasised that momentum must be 6
 7 maintained and, with the encouragement of core 7
 8 participants, CPs, you determined that a virtual hearing 8
 9 should take place today, 7 April, in order to consider 9
 10 a single issue. 10
 11 That issue, sir, as you've indicated, is whether 11
 12 some of the survivors of the arena attack should be 12
 13 designated as CPs. In a moment I'll turn to deal with 13
 14 the structure of this hearing and introduce the 14
 15 advocates from whom we anticipate you will receive 15
 16 submissions. But first it is important to say something 16
 17 about the survivors. 17
 18 As everyone knows, the arena attack has had 18
 19 devastating life-changing consequences for many, many 19
 20 people. The bereaved families suffered terrible losses 20
 21 and that is why you have made plain that they must be 21
 22 at the heart of this process. But as the application 22
 23 for consideration today makes clear, many of the 23
 24 survivors have suffered significant, sometimes 24
 25 life-changing, physical and psychological injuries. For 25

2

1 many, their lives have been irreparably damaged. 1
 2 We are sure we speak for all concerned in this 2
 3 inquiry in having the greatest sympathy and respect for 3
 4 the survivors, given their experiences. Moreover, we 4
 5 wish to acknowledge the constructive and cooperative 5
 6 basis on which their application for CP status is made 6
 7 and nothing we say from now on should detract from that 7
 8 acknowledgement. 8
 9 Having made those observations we will turn next to 9
 10 explain the structure of the hearing today and 10
 11 associated matters. By a letter dated 24 February of 11
 12 this year, Irwin Mitchell Solicitors applied for CP 12
 13 status on behalf of a group of survivors. You then set 13
 14 a timetable for written submissions to be received on 14
 15 that issue. Submissions were received from three of the 15
 16 bereaved family teams, from SMG, from the Home 16
 17 Secretary, and from the Greater Manchester Combined 17
 18 Authority, GMCA. Save for the submissions of GMCA, who 18
 19 expressed no objection, the submissions you received all 19
 20 raised concerns about the application and two of the 20
 21 three family teams positively opposed it. 21
 22 Submissions supplementing the original application 22
 23 were then received from those representing the 23
 24 survivors. Those are dated 31 March. They made plain 24
 25 that the application is in respect of 44 families and 25

3

1 individuals, comprising in total 56 individuals. 1
 2 Finally, submissions from counsel to the inquiry, CTI, 2
 3 were served on all CPs and on the survivors and those 3
 4 are dated 3 April. 4
 5 This hearing is being conducted by video link on the 5
 6 Zoom platform. To make it manageable, the only people 6
 7 who are joining you by active video are the advocates 7
 8 who wish to make submissions, along with the solicitor 8
 9 to the inquiry, Tim Suter, and the stenographers. The 9
 10 advocates who attend are as follows. 10
 11 As everyone knows, I am counsel to the inquiry and 11
 12 I am assisted by a team whose identities are now 12
 13 well-known to all. 13
 14 The survivors are represented by Brenda Campbell 14
 15 Queen's Counsel. One of the bereaved family groups 15
 16 represented by John Cooper Queen's Counsel. A second by 16
 17 Pete Weatherby Queen's Counsel and a third by 17
 18 Duncan Atkinson Queen's Counsel. 18
 19 SMG and the Home Secretary do not wish to make oral 19
 20 submissions as we understand it; they wish their short 20
 21 written submissions to stand. 21
 22 Many others have also joined by telephone link. 22
 23 The order in which we suggest you should read 23
 24 submissions, sir, is as follows: we, as CTI, should go 24
 25 first. We make submissions from an independent 25

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1 position . Even though you have seen and no doubt read
 2 our submissions along with the submissions of all
 3 others, this is, of course, a public hearing, at least
 4 as public as it can be made, and it is being live
 5 streamed for that purpose. So we will develop our
 6 submissions orally sufficiently to enable the public to
 7 understand the principles that we expect you will be
 8 applying and the arguments that are advanced.

9 What we will not be doing is rehearsing every line
 10 of CTI's written submissions, which run to 56 pages, or
 11 anything like every line . Nonetheless, we expect that
 12 what we have to say will take in the region of 1 hour or
 13 perhaps 1 hour and 10 minutes.

14 After CTI, we suggest that Ms Campbell should go
 15 next, then Mr Cooper, then Mr Weatherby and then
 16 Mr Atkinson. Then if any other advocate who is
 17 attending by telephone wishes to make submissions they
 18 will be able to do so.

19 We may then wish to make further submissions, but in
 20 our view, the final word should go to Ms Campbell on
 21 behalf of the survivors .

22 Sir, having dealt with the structure of the hearing
 23 we turn next to deal with CTI's submissions .

24 In summary, CTI have considered the survivors '
 25 application carefully alongside the submissions provided

1 by the CPs. While understanding the wishes of the
 2 survivors to be designated as CPs and their reasons, we
 3 consider that, applying the relevant legal principles ,
 4 the survivors should not be designated as CPs. That is
 5 in short because while some of the survivors in our view
 6 satisfy the significant interest criterion in
 7 rule 5.2(b) -- and indeed for the purposes of this
 8 application we proceed on the basis that all the
 9 survivor applicants are able to satisfy the significant
 10 interest criterion -- nonetheless the factors relevant
 11 to your discretion weigh against, and indeed weigh
 12 heavily against in our submission, the survivors '
 13 application .

14 Furthermore, in our submission, Articles 2 and 3 of
 15 the Convention on Human Rights do not alter this
 16 position . The investigative duties under Articles 2 and
 17 3, in our judgement, do not require you to designate the
 18 survivors as CPs.

19 Next, the legal framework. We are now at page 24 of
 20 CTI's submissions, which is page 67 of the bundle which
 21 has been circulated to all CPs. Your power to designate
 22 a person as a core participant is provided by rule 5 of
 23 the Inquiry Rules 2006. Rule 5.1 makes plain that
 24 you have a discretion as to whether to designate .
 25 Rule 5.2 makes plain that in deciding whether to

1 designate a person as a CP, you must consider a number
 2 of factors .

3 Of those, the only factor suggested by the survivors
 4 to be relevant is that set out in rule 5.2(b), namely:

5 "Whether the person has a significant interest in
 6 an important aspect of the matters to which the inquiry
 7 relates ."

8 We would emphasise two aspects of rule 5.2(b).
 9 First, the person must have a significant interest ,
 10 underlining the word " significant " . Second, the
 11 significant interest must be in an important aspect of
 12 the matters to which the inquiry relates . Again,
 13 underlining those words "to which the inquiry relates " .

14 As for the requirement that the interest be
 15 significant , in our written submissions from page 25
 16 we've identified that in a series of other public
 17 inquiries , rulings have been made to the effect that an
 18 applicant for CP status must meet what
 19 Sir Brian Langstaff, the chairman of the Infected Blood
 20 Inquiry, called :

21 "The emphatic threshold of a significant interest ,
 22 which is more than a mere interest ."

23 And this, in our submission, is unsurprising . As
 24 a matter of common sense and construction, the use of
 25 the word " significant " in rule 5.2 must be taken to have

1 a meaning over and above a mere interest . The interest ,
 2 to emphasise it once more, must be a significant one .

3 As for the requirement that the significant interest
 4 must be in an important aspect of the matters to which
 5 the inquiry relates , it is necessary to return to some
 6 of the history of these proceedings. This is to
 7 understand properly what are the matters to which the
 8 inquiry relates .

9 As everyone knows, the proceedings began life as
 10 inquest into the 22 deaths of the arena attack.
 11 However, following your PII ruling on the applications
 12 made by the Secretary of State for the Home Department,
 13 and Counter-terrorism Police North-West, you formed the
 14 view that an Article 2 compliant investigation into the
 15 deaths was not possible within the coronial framework.

16 As a result , on 27 September 2019, you wrote to the
 17 Home Secretary asking her to establish an inquiry . Your
 18 letter to her is at page 223 of the bundle, but the
 19 relevant parts are set out at paragraph 8 of CTI's
 20 written submissions. They're set out with highlighting .

21 Henry, I wonder if we could have on the screen ,
 22 please, first of all , page 48 of the bundle. What I'm
 23 taking you to, sir , is the paragraph of CTI's written
 24 submissions to which I referred which sets out the
 25 relevant parts of your letter to the Home Secretary with

1 highlighting . Thank you very much, Henry.
 2 So as we can now see, you indicated that you were
 3 writing to the Home Secretary:
 4 "... in light of recent developments in those
 5 inquests to request that a statutory public inquiry is
 6 established to investigate the matters within the scope
 7 of the inquest."

8 You went on to add:
 9 "I am acutely aware that underlying them is the
 10 enduring loss suffered by the families of those who were
 11 killed as a result of the bombing at the arena and that
 12 those families must remain central to any investigation
 13 into it .

14 "It is a matter [you said] of vital public
 15 importance that an Article 2 compliant investigation
 16 that is full , fair and fearless is conducted into the
 17 terrible events that resulted in the deaths of the
 18 22 people killed at the arena."

19 Sir, I won't carry on because it's apparent from
 20 what we've just seen that in requesting the
 21 establishment of the current inquiry , you as coroner
 22 stated that the inquiry being sought would investigate
 23 the same matters that the inquest had intended to
 24 investigate , that the purpose of the inquiry would be to
 25 investigate the circumstances that resulted in the

1 deaths of the 22 people killed at the arena and that the
 2 bereaved families would be central to the inquiry .

3 The terms of reference of the inquiry replicate the
 4 scope of the inquests . The purpose of the inquiry set
 5 out in the inquiry 's terms of reference is :

6 "To investigate how and in what circumstances
 7 22 innocent people came to lose their lives in the
 8 attack at the Manchester Arena on 22 May 2017 and to
 9 make any such recommendations as may seem appropriate."

10 The balance of the terms of reference reflect that
 11 purpose and focus on the 22 deceased and we don't repeat
 12 them.

13 So it comes to this : the inquiry 's purpose and scope
 14 are focused on the 22 people who came to lose their
 15 lives by investigating how and in what circumstances
 16 they came to die, the experiences of each deceased
 17 person, the immediate cause and mechanism of each death,
 18 and whether any inadequacies, whether in security
 19 arrangements or the emergency response, contributed to
 20 the extent of the loss of life that occurred and/or
 21 contributed to individual deaths.

22 There is no reference in the terms of reference to
 23 those who survived. It is not part of the scope of the
 24 inquiry to investigate how the survivors came to be
 25 injured , the medical treatment they received or the

1 experiences of each person who was injured . And that,
 2 we submit, is a simple but important fact when you, sir ,
 3 come to determine this application .

4 We return therefore to the point we were
 5 considering , which was that rule 5.2(b) is concerned
 6 with a significant interest in an important aspect of
 7 the matters to which the inquiry relates , and the
 8 inquiry relates to the deaths of the 22.

9 Sir, there are some other points we must make about
 10 the legal framework before we turn on. But rule 5.2, to
 11 which we've taken you, does not prescribe the factors
 12 you may take into account. As well as those factors ,
 13 you may also consider other relevant matters when
 14 determining an application for CP status. Indeed, in
 15 our submission, you're required to do so in accordance
 16 with the duty under section 17 of the Inquiries Act 2005
 17 to act with fairness and indeed as a matter of public
 18 law.

19 Sir, so you can follow the submissions, we're now at
 20 page 22 of the CTI submissions, which is page 71 of the
 21 circulated bundle. It is important, indeed critical , we
 22 submit, to emphasise that the decision whether to grant
 23 CP status is discretionary . There is no duty upon you
 24 to designate every applicant who meets the rule 5.2
 25 criteria or some of them. You may therefore decline to

1 grant CP status where the criterion rule of 5.2 are met
 2 and there may be good reasons not to grant CP status to
 3 every applicant who meets the rule 5.2 criteria . For
 4 example, where the number of CPs could be huge were all
 5 those meeting the rule 5.2 criteria given CP status,
 6 resulting in the inquiry becoming unwieldy, unmanageable
 7 and so defeating its very purpose.

8 Similarly , as was said by Lord Penrose, the chairman
 9 of the Penrose Inquiry :

10 "Selection among qualifying applicants might be
 11 necessary in the best interests of the efficient and
 12 cost- effective management of the inquiry, for example to
 13 avoid unnecessary repetition ."

14 The discretion to designate CPs should therefore be
 15 exercised practically , taking into account the
 16 consequences of designation .

17 Your discretion whether to grant CP status is broad.
 18 Section 17.1 of the Act provides that the procedure and
 19 conduct of an inquiry are to be such as the chairman of
 20 the inquiry may direct subject , of course, to provisions
 21 of the 2005 Act and the 2006 rules ; and the broad nature
 22 of your discretion has been recognised in the
 23 submissions of a number of the CPs. By way of example,
 24 the submissions of BJC and Hudgells, paragraph 2, that's
 25 page 13 of the bundle, and the submission of Hogan

1 Lovells at paragraph 8, that's page 21 of the bundle.
 2 So in the context of the decision on CP status, your
 3 broad discretion, sir, is limited only by the
 4 following: the provisions of rule 5, which require you
 5 to consider in particular the matters listed at
 6 rule 5.2; the duty to act with fairness and with regard
 7 to the need to avoid any unnecessary cost, that's to say
 8 the duty in section 17.3; the duty to take into account
 9 relevant considerations and ignore irrelevant
 10 considerations; the obligation under section 6.1 of the
 11 Human Rights Act 1998 not to act incompatibly with
 12 Convention rights; and, of course, the requirements of
 13 public law rationality.

14 Sir, that's all we have to say about the legal
 15 framework and we hope that what we've said will not be
 16 controversial.

17 The balance of our submissions will address the
 18 following three questions: 1, do the survivors satisfy
 19 the criteria within rule 5.2 to which we've referred?
 20 2, if they do, or some of them do, how should you
 21 exercise the broad discretion to which we've made
 22 reference? 3, do Articles 2 and 3 of the Convention
 23 make any difference to the outcome in the circumstances
 24 of this particular case?

25 So question 1: do the survivors satisfy Rule 5.2?

1 We're now at page 29 of the CTI written submissions,
 2 bundle page 72. As we've observed already, the
 3 survivors rely upon the significant interest criterion
 4 in rule 5.2(b), but not upon any other factor in
 5 rule 5.2. That is, may we say, realistic and also
 6 helpful.

7 Although for our part we don't consider it's
 8 entirely straightforward to identify what a significant
 9 interest is in this context, we submit that it is clear
 10 that at least some of the survivors satisfy this
 11 criterion and a number of CPs have made the same
 12 observation in their submissions.

13 We've just emphasised that at least some of the
 14 survivors satisfy the significant interest criterion.
 15 That's because some of the survivors can rightly point
 16 to the fact that they were present in the City Room
 17 at the time of the attack, they were targeted by
 18 Salman Abedi in the City Room, and they sustained
 19 significant life-affecting injuries as a result.

20 Their significant interest, that's to say the
 21 significant interests of those we've just mentioned,
 22 include understanding how the attack occurred and
 23 whether it could have been prevented, so terms of
 24 reference topics 1 to 4; understanding whether the
 25 emergency response was adequate in a generic sense,

1 terms of reference topic 5; and seeking to prevent
 2 future atrocities so that others do not suffer the sorts
 3 of irreparable injuries that they have suffered.

4 So in broad terms, the survivors' significant
 5 interests are therefore in preventability, understanding
 6 and future prevention, or at least some of the applicant
 7 survivors have that significant interest in our
 8 judgement.

9 However, while at least some of the survivors do, in
 10 our view, have a significant interest, the basis for
 11 that interest is subject to important limits, we submit.
 12 First of all, it is limited by the inquiry's terms of
 13 reference, which are focused upon the 22 people who
 14 died, as we have emphasised. The survivors cannot have
 15 a significant interest in matters that the inquiry is
 16 not investigating.

17 As a result, the survivors cannot have a significant
 18 interest within the meaning given to that phrase by rule
 19 5.2(b) in the following matters: the experiences of each
 20 survivor; the emergency treatment they received; the
 21 adequacy of such treatment; whether any inadequacies in
 22 treatment caused or contributed to survivors' injuries;
 23 and/or the extent of such injuries. That is because
 24 those are not matters to which the inquiry relates,
 25 applying the language of rule 5.2(b) as, sir, we submit

1 you must.

2 Second, their significant interest arises from
 3 a combination of factors, including their status as
 4 survivors, that is to say individuals who were targeted
 5 with the intention that they should be killed, their
 6 presence at the scene of the detonation, and the fact
 7 that they have suffered significant injuries as a result
 8 of the attack.

9 Recognising the significant interest of survivors in
 10 these circumstances does not mean that the hundreds or
 11 even thousands of other concert goers, emergency
 12 responders, volunteers and family members who were
 13 present before, during and after the attack would meet
 14 the significant interest criterion. Far from it.
 15 Similarly, it does not mean that anyone affected by the
 16 arena attack has a significant interest.

17 As we have stated at the outset, very many people
 18 have been affected by the arena attack, they do not all
 19 have a significant interest and that, we submit, must be
 20 understood.

21 The question that follows from emphasising that some
 22 of the survivor applicants certainly have a significant
 23 interest is whether all do or only some. In our
 24 submission, an analysis could be conducted applicant by
 25 applicant, applying a range of relevant factors to

1 identify who does and who does not have a significant
2 interest .

3 Were such an exercise carried out, we suggest that
4 some of the applicant survivors would be capable of
5 establishing significant interest while it is likely
6 that others would not.

7 As we have set out, we don't pretend that the issue
8 of what interest is significant is an easy one to
9 resolve . However, the distinction between the two
10 groups will be likely , on our analysis , as CTI, to be
11 based on the types of factors identified a few moments
12 ago, including presence in the City Room at the time of
13 the attack and the extent and severity of the injuries
14 that each survivor had suffered . That's because in
15 circumstances where the matters to which the inquiry
16 relates concern the deaths of the 22 people who were
17 killed in the attack . In the case of a survivor , the
18 more severe the injury the more significant the interest
19 an individual is likely to have in issues of
20 preventability , understanding and future prevention . We
21 hope that makes sense to all of those who are listening
22 and watching.

23 However, our strong view as CTI is that such an
24 applicant-by-applicant analysis should be avoided unless
25 absolutely necessary . There are numerous obvious

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1 reasons for that which we don't consider it necessary to
2 address in detail . Suffice it to say that such an
3 exercise would put all concerned in a highly
4 objectionable position , including the survivors
5 themselves, you as chairman, the inquiry legal team, and
6 all CPs and legal representatives addressing the issue ,
7 and may cause further harm to the survivors over and
8 above the harm that they have already suffered , and such
9 harm in our view must be avoided.

10 Can the survivors ' application be properly and
11 fairly determined without recourse to an
12 applicant-by-applicant analysis? In our submission, it
13 can and therefore it should be. You can approach the
14 application on the basis that for these purposes all the
15 current applicants are able to demonstrate a significant
16 interest and we would invite you to adopt that approach
17 for the following reasons.

18 1, it will allow the survivors ' application to be
19 determined without an applicant-by-applicant analysis ,
20 and that in itself , in our judgement is a strong reason
21 in its favour, given how unattractive the alternative
22 is .

23 2, in our submission there can be no doubt that at
24 least some survivors have a significant interest and
25 a number of CPs agree. Moreover, no CP has disagreed

18

1 with that proposition . In these circumstances, the
2 issue of significant interest is not determinative of
3 the application . Some applicants have a significant
4 interest and their applications fall to be decided by
5 considering the range of other factors that weigh for
6 and against the application .

7 An applicant-by-applicant analysis would only
8 identify the number of applicants with a significant
9 interest . Those applications would still then need to
10 be considered by reference to a range of wider factors
11 that bear on the exercise , sir , of your discretion .

12 3, if an applicant cannot demonstrate a significant
13 interest , that does not preclude designation as a CP.
14 You must in particular consider the matters in rule 5.2,
15 but where those matters are absent you are not required
16 to refuse CP status. So even an applicant-by-applicant
17 analysis would therefore still require you to consider
18 every application by reference to a range of factors
19 relevant to your discretion .

20 4, CPs will not be prejudiced without an
21 applicant-by-applicant analysis at this stage. If you
22 proceed on the basis that all the current applicants can
23 demonstrate a significant interest , CPs could make --
24 and indeed some have already made -- detailed
25 submissions on the survivors ' application . Should you

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1 rule against the application , there would then be no
2 issue . Were you minded to grant the application , you
3 could at that stage invite CPs to indicate if they wish
4 to make submissions upon an applicant-by-applicant
5 basis , bearing in mind the issues with that exercise and
6 the need to avoid it if possible .

7 If you did not consider that such an exercise was
8 necessary you could then finalise your "minded to"
9 indication . If you considered that it was appropriate
10 and necessary to receive submissions on an
11 applicant-by-applicant basis , CPs, the survivors and CTI
12 could then provide such submissions and you could make
13 a final ruling on each survivor application .

14 Accordingly, in the view of CTI, at least some of
15 the survivors have a significant interest and, on our
16 proposed approach, it should be assumed for the purposes
17 of this application that all the applicants can
18 demonstrate a significant interest .

19 So we discourage you, respectfully , from engaging on
20 this application in ruling on what a significant
21 interest means; it simply is not necessary for you to do
22 so.

23 Sir, if we're right in the submission we've just
24 made, the question that follows is whether the
25 applications that have been made should be granted as

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1 a matter of your discretion . This, of course, is the
2 second question that we have identified . Whilst, as one
3 would expect, the factors relevant to your discretion do
4 not all point in one direction , on balance, in our
5 submission, they weigh against granting the application
6 and do so heavily .

7 What we intend to do now is to identify what we
8 regard as the relevant factors , whichever direction they
9 point in , and to make our submissions on them. Sir ,
10 we're now at page 33 of CTI's written submissions ,
11 page 76 within the bundle .

12 Factor 1, the views of the bereaved families . You
13 as chairman have repeatedly emphasised, as indeed we
14 pointed out earlier , that the bereaved families are and
15 must be at the heart of the inquiry . We as CTI could
16 not agree more. In considering the survivors '
17 application , the views of the bereaved families are
18 therefore central . It is worth noting that the
19 centrality of the views of the bereaved was recognised
20 by Lady Justice Hallett in her ruling on a similar issue
21 that arose at the 7/7 inquests ; see paragraph 49 of
22 CTI's submissions .

23 In their submissions, the bereaved families
24 emphasised, and rightly emphasise, that they must remain
25 at the heart of the inquiry and that nothing should be

1 done to dilute their central role . It is clear that
2 they consider that the survivors ' application risks such
3 a dilution .

4 None of the family teams in their written
5 submissions support the survivors ' application . All
6 expressed significant concerns about the implications of
7 the survivors ' application , and two of the three family
8 teams who have made submissions oppose the application .
9 Their position in our submission must carry weight given
10 its source, uniformity , and the underlying reasons
11 behind it .

12 In addition , were the survivors ' application
13 granted, you would have to consider whether the
14 survivors should have separate representation or be
15 required to share representation with one or more of the
16 family teams. That prospect is understandably likely to
17 be a matter of significant concern to the families and
18 weighs against the granting of the application .

19 So, sir , that first factor , the views of the
20 bereaved families , as we've just said , weighs against
21 the grant of the application .

22 Factor 2, the views of other core participants . The
23 views of other core participants are of course relevant .
24 All CPs were afforded the opportunity to provide
25 submissions on the survivors ' application . No CP has

1 indicated support for the survivors ' application . GMCA
2 have expressed no objection , but both the Home Secretary
3 and SMG have expressed concern over the application . In
4 our view some weight should be attached to their views
5 which are expressed in measured terms .

6 Factor 3, the effect on core participants and wider
7 public confidence in the inquiry . The effect , if any,
8 on CP confidence and wider public confidence in the
9 inquiry if the CP application of the survivors were
10 granted is arguably at least a relevant factor to which
11 you are entitled to have regard . In our submission ,
12 this factor is likely to prove neutral in the present
13 application .

14 Granting the survivors ' application may undermine
15 the families ' confidence in the inquiry to some degree
16 given the concerns that they have expressed. However,
17 on the other hand, refusing the application may cause
18 some damage to public confidence in the inquiry as the
19 wider public may be concerned that survivors of the
20 attack were not granted CP status. However, any public
21 concern would no doubt be tempered by an understanding
22 of the bereaved families ' position and the reasons for
23 a refusal .

24 Factor 4, whether granting CP status to the
25 survivors would add to the inquiry achieving its aims or

1 assist the inquiry in fulfilling its terms of reference .
2 This, sir , in our submission, is an important issue . In
3 determining applications for CP status, whether the
4 applicants are able to show that they would add to the
5 inquiry achieving its aims, assist the inquiry in
6 fulfilling its terms of reference and/or would raise or
7 pursue further lines of enquiry not already being
8 pursued are relevant factors , indeed highly relevant .
9 This has been recognised in a number of other inquiries ,
10 as we have set out in paragraph 55 of CTI's submissions .

11 In our submission , granting CP status to the
12 survivors will not materially add to the inquiry
13 achieving its aims, assist the inquiry in fulfilling its
14 terms of reference , or serve to identify further lines
15 of inquiry not already being pursued. This is for
16 a number of reasons, many of which are similarly
17 identified in the submissions of a number of bereaved
18 families ; see CTI's submissions at paragraph 56 .

19 The principal reasons are as follows . First , the
20 inquiry 's terms of reference are focused on the
21 deceased. Its purpose is to investigate how and in what
22 circumstances the deceased died . It should not be
23 diverted from that purpose towards an investigation of
24 those who survived the attack in our view .

25 Second, the bereaved families are actively involved

1 in the inquiry as core participants and are legally
 2 represented. Numerous other CPs are actively involved
 3 and represented. The inquiry has an experienced legal
 4 team to assist you, the chairman. In these
 5 circumstances it is not clear how granting CP status to
 6 survivors would add to the inquiry fulfilling its terms
 7 of reference.

8 Third, the terms of reference do not include the
 9 investigation of how the survivors came to be injured,
 10 the experiences of each survivor, the emergency
 11 treatment they received, the adequacy of such treatment,
 12 whether any inadequacies in treatment caused or
 13 contributed to survivors' injuries and/or the extent of
 14 such injuries. The survivors cannot assist the inquiry,
 15 to put it in simple terms, in investigating matters that
 16 are not within the terms of reference.

17 Fourth, to the extent that the survivors could
 18 assist the inquiry through submissions and proposed
 19 questions for witnesses in relation to issues of
 20 preventability, understanding and future prevention, the
 21 inquiry already has the assistance of the bereaved
 22 families with whom, as the survivors recognise, they
 23 share a common interest and common positions as well as
 24 other CPs and its own legal team.

25 Fifth, it is submitted by the survivors that because

1 of their experiences on the night, they will bring "an
 2 additional level of scrutiny that would enhance the
 3 inquiry's function"; that's paragraph 6 of the
 4 survivors' submissions.

5 With the greatest of respect, it is not clear to CTI
 6 what additional scrutiny would be provided were the
 7 survivors designated as CPs. The bereaved families are
 8 CPs. They are, as we've indicated, legally represented
 9 through a number of highly experienced legal teams and
 10 the inquiry already benefits from the extensive scrutiny
 11 provided by numerous legally represented CPs and an
 12 experienced inquiry legal team and a chairman who is
 13 a retired High Court judge. The inquiry therefore
 14 already exhibits, in our view, a very high degree of
 15 investigative scrutiny.

16 Sixth, the survivors submit that they would add:
 17 "... considerable value to the inquiry's function by
 18 a substantive contribution to what happened on the
 19 evening"; paragraph 9 of their submissions.

20 Their submissions identify a range of evidential
 21 contributions that the survivors could make, including
 22 by reference to full survivor experiences. We have no
 23 doubt that survivors are likely to be able to provide
 24 relevant evidence to the inquiry or at least some of
 25 them. The inquiry would welcome such evidence and

1 would, of course, consider it in discussion with the
 2 survivors, irrespective of whether the survivors are
 3 designated as CPs.

4 However, to the extent the survivors can contribute
 5 relevant evidence to the inquiry, that does not require
 6 CP designation because it can be provided by survivors
 7 providing witness evidence for the inquiry's
 8 consideration.

9 Seventh and finally, on the topic of this fourth
 10 consideration, the survivors' application does not in
 11 fact identify any further lines of inquiry that are not
 12 already being pursued by the inquiry.

13 In sum, therefore, sir, our submission is that this
 14 fourth factor weighs heavily against the survivors'
 15 application.

16 Factor 5, whether the survivors would bring
 17 a different or unique perspective if granted CP status.
 18 The survivors submit that they:

19 "... bring with them such a significant degree of
 20 insight without which this investigation, within its
 21 existing terms of reference, would be considerably
 22 poorer"; see paragraph 16 and also paragraph 24 of their
 23 submissions.

24 Whether an applicant would bring a different or
 25 unique perspective has, we acknowledge, been recognised

1 as a relevant factor in previous inquiries and inquests,
 2 for example in the Leveson Inquiry, and in the 7/7
 3 inquests. However, the different or unique perspective
 4 being relied upon must necessarily relate to the
 5 inquiry's terms of reference and, to be fair about it,
 6 the survivors' submissions do recognise this.

7 In our submission, the survivors would not bring
 8 a different or unique perspective to matters that are
 9 within the inquiry's terms of reference. That is for
 10 the following reasons.

11 First, as the survivors recognise, they share common
 12 interests and common positions with the bereaved
 13 families; paragraph 15 of the survivors' submissions.

14 It is not apparent that the survivors would offer
 15 a materially different perspective to the families on
 16 any of the issues within the inquiry's terms of
 17 reference.

18 Second, we accept that the survivors may have unique
 19 or significant evidence to provide, for example on the
 20 moments before the detonation. We've noted, for
 21 example, the evidence of Andrea Bradbury, summarised at
 22 paragraph 24.2 of the survivors' submissions, and the
 23 emergency response to the bombing. Again, we have noted
 24 the evidence of Martin Hibbert, summarised at paragraph
 25 24.3 of the survivor submissions.

1 That is not the same as having a unique perspective
 2 that requires CP status. Where a survivor has unique or
 3 significant evidence to give, that can be provided to
 4 the inquiry and, as we've suggested, the inquiry would
 5 of course welcome and consider such evidence. But CP
 6 status is not required to allow evidence to be provided.

7 Third, we recognise that the survivors are likely to
 8 have a unique perspective on certain issues falling
 9 outside the terms of reference, for example the adequacy
 10 of the emergency treatment they received. However, that
 11 does not assist their application for CP status because
 12 the survivors cannot rely on a unique perspective into
 13 matters that the inquiry is not investigating, for the
 14 reasons we've explained.

15 Fourth and finally, it is not necessary to designate
 16 the survivors as CPs to ensure that there are
 17 individuals involved in the inquiry who are
 18 representative of aspects of public concern, to use the
 19 language of Sir Brian Leveson in the Leveson Inquiry.
 20 The bereaved families who are core participants and are
 21 legally represented already ensure that that requirement
 22 is amply met.

23 Sir, as with a number of other factors, our
 24 submission is that factor 5 weighs against the
 25 survivors' application.

1 Factor 6, whether the issues relevant to the
 2 survivors are so substantial as to require CP status.
 3 In the Leveson Inquiry, Sir Brian Leveson considered
 4 whether the particular issues relevant to three victim
 5 applicants were:

6 "... so substantial in the context of the overall
 7 picture as to require core participant status."

8 In our submission, for the reasons we've set out
 9 already, and as are explained in further detail in
 10 paragraphs 56 to 60 of CTI's written submissions, there
 11 appear to be no issues relevant to the survivors that
 12 are so substantial in the context of the overall picture
 13 as to require CP status.

14 We turn therefore to factor 7, the effect or effects
 15 on the management and progress of the inquiry if the
 16 survivors are designated as core participants. This
 17 too, of course, is an important issue for your
 18 consideration, sir.

19 The effect on the management and progress of the
 20 inquiry as a whole is a relevant consideration when
 21 determining CP applications. This indeed has been
 22 recognised in numerous inquiries, as we have set out at
 23 paragraph 63 of CTI's written submissions, but it is in
 24 any event perhaps no more than common sense.

25 In our submission, the practical concerns that may

1 occur if the survivors' application is granted are
 2 capable of being grouped into four categories.

3 First, granting the survivors' application would or
 4 might result in further delay to the start date. In our
 5 submission, such a delay is not likely. The start date
 6 has been postponed to 7 September due to the COVID-19
 7 outbreak. The inquiry team will ensure, so far as it's
 8 within their control, that the inquiry is ready to
 9 commence on 7 September.

10 Should designation of the survivors as CPs generate
 11 some anticipated additional work, including providing
 12 disclosure to the survivors and identifying and viewing
 13 and providing additional disclosure to CPs, the inquiry
 14 team will, we assure you, sir, take the necessary steps
 15 to ensure that that does not affect the start date.

16 In addition, the postponement to 7 September affords
 17 additional time for any further work to be undertaken.
 18 The postponement to that date also provides additional
 19 time for the survivors to prepare, should they be
 20 granted CP status.

21 The survivors have sought to give an undertaking
 22 that there will be no delay if they are designated as
 23 CPs. While we share the concerns expressed by
 24 Mr Cooper's team about the ability of the survivors to
 25 give guarantees as to readiness prior to receiving

1 disclosure, the survivors have submitted, through
 2 experienced leading counsel, not to be the cause of any
 3 delay to the start date and, so far as possible, they
 4 can be held to that commitment if necessary.

5 However, while further delay to the start date is
 6 unlikely, granting the survivors' application does add
 7 a degree of risk, which is real, even if limited and
 8 that is for the following reasons.

9 Designating the survivors as CPs should not generate
 10 significant additional work for the inquiry. While the
 11 survivors' original application did not indicate whether
 12 the survivors intended to invite the chair, you sir, to
 13 expand the investigative scope of the inquiry and/or to
 14 seek to amend the terms of reference, the survivors'
 15 written submissions, drafted by legal counsel, suggest
 16 that the survivors' participation as CPs can be
 17 accommodated within the inquiry's existing terms of
 18 reference. It is also stated there is no such
 19 invitation to you, sir, to seek to amend the terms of
 20 reference.

21 However, in our view as CTI, the position is still
 22 not entirely clear. Some of the matters about which the
 23 survivors suggest that they could add considerable value
 24 to the inquiry's function would seem necessarily to
 25 involve an expansion of the inquiry's investigative and

1 evidential scope, particularly if they were to include
 2 survivor - specific issues and/or be investigated in such
 3 a way that the survivors will have a particular
 4 contribution to make.
 5 For example, the survivors suggest that they could
 6 contribute to:
 7 "... an understanding of why some lived when others
 8 died, consideration of best practice or missed
 9 opportunities, opportunities and/or appreciation of
 10 measures that should be taken or recommendations made to
 11 ensure lessons are learned"; we quote from paragraph 9
 12 of the survivors' submissions.
 13 It is also suggested that:
 14 "A degree of individual focus on specific survivors
 15 who received emergency medical care following the
 16 detonation ..."
 17 And the examples given in survivors' written
 18 submissions are Martin Hibbert and his daughter:
 19 "... would better equip the families and the chair
 20 to understand the adequacy of the emergency medical
 21 response and, in particular, whether any inadequacies
 22 undermined the ability of the response to save life";
 23 paragraph 24.3 of the survivors' submissions.
 24 It seems to us that insofar as the survivors have
 25 a particular contribution to make on those matters, they

1 appear to be the sort of evidential issues which the
 2 inquiry is not currently investigating, given its terms
 3 of reference.
 4 To examine such matters would therefore require an
 5 expansion of the inquiry's investigative scope. To take
 6 the example given by the survivors of "why some lived
 7 when others died", and the investigation of the adequacy
 8 of survivors' medical treatment, an investigation into
 9 those issues would be likely to involve significant
 10 further disclosure, for example of survivor medical
 11 records, witness evidence and expert evidence. The
 12 implications of such an expansion would be far reaching
 13 and significant, and importantly, they would pose a very
 14 real risk to the inquiry's start date and would
 15 inevitably lengthen the inquiry's hearings to
 16 a substantial degree and that is undoubtedly a factor of
 17 importance which Ms Campbell may wish to address.
 18 Even if the survivors do not seek to expand the
 19 inquiry's scope or terms of reference, designating them
 20 as core participants is likely to generate some further
 21 work for the inquiry, including providing disclosure to
 22 the survivors and providing additional disclosure to
 23 CPs.
 24 In addition, the involvement of the survivors may
 25 result in further work that cannot currently be

1 identified with any certainty. For example,
 2 applications to put questions to the inquiry's experts,
 3 requests that the inquiry instruct further experts,
 4 requests that additional witnesses be identified and
 5 statements obtained, applications to revise the
 6 inquiry's current restriction orders, applications for
 7 special measures and the like.
 8 In our view, the impact of such further work should
 9 not be overstated. However, there does remain a risk,
 10 and given the time that has elapsed since the arena
 11 attack and the unavoidable delays that have been caused
 12 by the criminal trial of Hashem Abedi and now the
 13 COVID-19 outbreak, any risk of delay must be taken
 14 seriously and, we suggest, avoided at all costs.
 15 Second, in terms of dealing with the four headings
 16 under this factor, Hogan Lovells on behalf of one family
 17 group raised the possibility that the survivors'
 18 involvement may delay the necessary pre-hearing
 19 disclosure. In our judgement, this is an understandable
 20 concern to raise. However, in our view, such a delay is
 21 unlikely unless the survivors seek an expansion of the
 22 inquiry's scope and/or terms of reference and, were it
 23 to occur, it is likely to result in only a limited delay
 24 in concluding the final aspects of the disclosure
 25 process.

1 Third, that granting the survivors' application
 2 would or might result in protraction to the inquiry's
 3 evidence hearings, prolonging the duration of the
 4 inquiry and thus delaying the publication of the
 5 inquiry's report. This, in our view, is indeed
 6 a concern.
 7 There are a number of reasons why designating the
 8 survivors as core participants is likely to result in at
 9 least some prolongation of the inquiry's evidence
 10 hearings. The survivors are likely to call for more
 11 witnesses and to seek to ask questions of witnesses.
 12 They have stated that intention quite properly in their
 13 written submissions.
 14 In our experience, the greater the number of CPs
 15 there are, the greater the number of witnesses, the
 16 greater the number of questions and the longer each
 17 witness takes, although of course that is not automatic
 18 and can be controlled by you, sir.
 19 The survivors, as with other CPs, are likely to
 20 raise matters and make submissions during the inquiry's
 21 evidence hearings. Again, that would be quite proper,
 22 but again it may increase the duration of the hearings.
 23 The involvement of the survivors may slow the
 24 progress of the hearings due to the need for the
 25 survivors' representatives to take instructions from

1 a large group and as a result of the increased
2 difficulty in non-state CPs working together on witness
3 questioning .

4 On balance, while granting the survivors '
5 application is likely to result in a degree of
6 protraction to the process. The additional time that
7 the inquiry will take should not be overstated, however,
8 in our view. The inquiry already involves multiple
9 legal teams. Although many in number, the survivors
10 would add only a single legal team and even that would
11 not be automatic, given the terms of rule 7, although
12 we're conscious that joint representation may pose its
13 own difficulties and be objected to by both the bereaved
14 families and indeed the survivors .

15 The submission from Hogan Lovells that the
16 survivors ' application may give rise to a proliferation
17 of legal teams with potentially serious consequences of
18 delay and protraction to the process is understandable
19 in our view, but unlikely to be realised . All the
20 survivors are represented by a single firm of solicitors
21 and there is no indication that granting the application
22 will result in more than one additional legal team to
23 represent the survivors ' interests . In any event, sir ,
24 you have rule 7 powers that you could exercise .

25 The survivors have, moreover, indicated that they

1 intend to take a proportionate and focused approach and
2 we, for our part, have confidence that their experienced
3 legal representatives would do so.

4 You can control, of course, the number of witnesses
5 that are called and the questions that the survivors are
6 permitted to ask. Such control will already be
7 exercised by the inquiry in respect of existing CPs.
8 The addition of the survivors is therefore unlikely
9 significantly to increase the witness list or the time
10 taken for each witness .

11 Delay caused by the survivors taking instructions
12 and the difficulties of working with the other family
13 legal teams should not be exaggerated, in our
14 submission. The survivors have indicated that they
15 intend to work constructively with all concerned and
16 that their working arrangements will be sensible .

17 In addition, joint working between the survivors and
18 the family legal teams will be a matter for all of those
19 CPs and their legal representatives and it will be in
20 the interests of all to ensure efficient working
21 arrangements are put in place.

22 Fourth and finally on this seventh factor ,
23 Hogan Lovells have expressed concern that adding a large
24 number of core participants may have an impact on the
25 facilities available to the bereaved families at

1 Manchester Magistrates' Court and at the Conference
2 Centre.

3 While we of course understand the anxiety this has
4 caused to some families , we do not consider that this
5 issue should weigh against the survivors ' application .
6 We anticipate that the arrangements for private spaces
7 available to the bereaved families at both the
8 Manchester Magistrates' Court and the Conference Centre
9 would remain and designation of the survivors would not
10 alter that.

11 As to the availability of the public gallery in the
12 Magistrates' Court, that would not be changed were the
13 survivors designated as CPs, with the families
14 continuing to be given priority in accessing seating
15 available .

16 Sir, those are our submissions on that seventh
17 important factor .

18 Factor 8, costs. Sir, as you well know, you are
19 required by section 17.3 of the Act to:

20 "Have regard to the need to avoid any unnecessary
21 costs when making decisions on the procedure and conduct
22 of the inquiry ."

23 There is no doubt that if the survivors ' application
24 is granted, that will increase the costs of the inquiry .
25 The extent of that increase will depend on whether the

1 survivors were permitted to have separate
2 representation , which we anticipate they would seek, but
3 we suggest confirmation may be sought from Ms Campbell
4 on whether they were to make an application under
5 section 40 of the Act for legal representation funding,
6 the extent of any funding that were granted, the extent
7 of the survivors ' involvement on the length of the
8 hearings and what additional work the inquiry is
9 required to do as a result of the survivors ' designation
10 as CPs.

11 In particular , if the survivors successfully sought
12 to expand the scope and alternative reference of the
13 inquiry , that would, without question, significantly
14 increase the inquiry 's costs. Even if the survivors
15 only required some additional funding through separate
16 or joint representation , in our submission such funding
17 would arguably constitute an unnecessary cost, given the
18 matters set out in paragraphs 56 to 62 of CTI's written
19 submissions.

20 In summary, the survivors would not materially add
21 to the inquiry achieving its aims and would not bring
22 a unique perspective to the inquiry , which are matters,
23 sir , that we've summarised already.

24 Factor 9, the ability of the survivors to engage
25 with, contribute to and participate in the inquiry

1 without being designated as core participants . This
2 again is an issue of considerable importance in our
3 submission .

4 It has been recognised in a number of statutory
5 inquiries that the ability of those affected by the
6 subject matter of the inquiry to participate in the
7 inquiry without CP status is a relevant factor . But the
8 survivors here in this inquiry can participate in the
9 inquiry in a number of ways: they can provide evidence
10 to the inquiry ; through the transcripts , website and
11 live stream they can follow most of its hearings and
12 review most of the evidence put before the inquiry
13 during the hearings ; it may also be possible to provide
14 the survivors with a degree of relevant disclosure ,
15 albeit falling short of that provided to CPs, and
16 we would not wish to overly emphasise this factor .

17 Other avenues for participation exist , for example
18 allowing the survivors to raise issues with the inquiry
19 legal team, identifying topics for CTI questioning , and
20 providing submissions in order to recognise their
21 particular interest in the inquiry .

22 Sir , as you know, and other core participants know,
23 a similar approach has been adopted in other inquiries
24 and inquests , including the 7/7 inquests ; see
25 paragraph 75 of CTI's submissions .

1 Factor 10, whether the survivors have shown
2 a sufficient interest in the workings and conclusions of
3 the inquiry . Sir , this is , we well understand, a factor
4 that is liable , once raised , to generate strong
5 feelings . May we be clear that we do not in any sense
6 wish to suggest that the applicant survivors are not
7 interested in the circumstances surrounding the attack
8 and the response to it . That is not our point at all .
9 The issue that we are addressing is engagement with this
10 process, the inquiry as it now is, inquest as it was .

11 In the Infected Blood Inquiry :
12 "Applicants who were able to demonstrate, through
13 their actions , an interest in the workings of the
14 inquiry as well as how important the conclusions of the
15 inquiry are for them [to quote the chairman of that
16 inquiry] were generally granted CP status ."

17 This can be shown in that case, in that inquiry , by
18 involvement in prior campaigning for the establishment
19 of the inquiry , joint instruction of lawyers to
20 represent their interests , and having played an active
21 part in previous relevant inquiries or associated
22 litigation .

23 Clearly , the circumstances that led to the
24 establishment of this inquiry are far removed from the
25 Infected Blood Inquiry . No campaigning, previous

1 inquiries or associated litigation was involved .
2 Nonetheless, you may, sir , consider that the degree of
3 engagement shown by the survivors in this process prior
4 to their application has some relevance .

5 The survivors have, of course, sought legal
6 representation to make their core participant
7 application and have indicated their desire to
8 contribute to this inquiry 's process .

9 However, as far as we as CTI are aware, the
10 survivors did not make contact with STI, with you , sir ,
11 when sitting as a coroner , or with the previous coroner
12 during the coronial investigation .

13 Unlike, for example, in 7/7, at no stage during the
14 inquests did the survivors seek IP status or request any
15 formal status to participate in the coronial
16 investigation .

17 Following the establishment of the inquiry , under
18 the 2005 Act, the survivors did not make contact with
19 STI or with you until submitting their CP application ,
20 which was, as a matter of fact , made over 3 months after
21 the deadline for submission of CP applications had
22 lapsed .

23 So sir , it comes to this -- and this is a submission
24 that we hopefully make with sensitivity , but this is
25 a relevant factor nonetheless: in our submission, the

1 survivors , while plainly interested in the circumstances
2 surrounding the attack and the response to it , have
3 shown a relatively limited degree of interest in the
4 inquiry and in the preceding coronial investigation ,
5 using the word " interest " in the sense that we have
6 described , in other words engagement in this process .

7 Factor 11, delay in submitting the application .
8 Sir , this is addressed at paragraph 79 of our
9 submissions . The inquiry protocol , which is at page 157
10 of the bundle, required applications for core
11 participant status to be submitted by 20 November of
12 last year . This application , that is to say the
13 application that you are concerned with today , sir , was
14 submitted more than 3 months later , on 24 February of
15 this year , as we have indicated .

16 The submissions provided by Hogan Lovells on behalf
17 of one of the family groups raised concerns over the
18 late submission of the survivors ' application and any
19 further delay in adding further applicants to the
20 application . Those concerns are once more
21 understandable but on balance our view as CTI is that in
22 this particular case, and on this particular
23 application , the delay in the survivors submitting their
24 application should carry little or no weight in the
25 determination of the application . Accordingly, our

1 submission to you, sir, is that the application can and
2 should be decided now and on its merits.

3 Whilst making that concession in the circumstances
4 of this particular application, we make plain that
5 compliance with the inquiry's protocol is of a high
6 degree of importance and should be expected, for
7 a number of reasons, including to ensure the efficient
8 running of the inquiry and to avoid distress and upset
9 to affected core participants, in particular the
10 bereaved families.

11 Accordingly, it should not be understood that this
12 will be CTI's position in relation to all late CP
13 applications. The survivors are, in our view, plainly
14 in a particular position.

15 The final factor, factor 12, the significance to the
16 survivors in being designated as core participants.
17 In the 7/7 survivors ruling, Lady Justice Hallett had
18 regard to the "very moving statement" from one of the
19 survivors, setting out what it would mean to her to be
20 designated an interested person:

21 "She feels it would make a considerable difference,
22 she would feel a proper part of the process, and
23 it would enable her to see documents."

24 Sir, we have no doubt that for some survivors,
25 perhaps all, designation as a core participant would

1 mean a great deal. Without intending the merest hint of
2 criticism, we note that the issue is not addressed in
3 any detail in the survivors' application or written
4 submissions.

5 However, in our submission, you should proceed on
6 the basis that receiving CP status would be important to
7 the survivors. Of course, the significance to survivors
8 in being designated is one of a number of relevant
9 factors that you may wish to consider. However, other
10 factors are likely, ultimately, in our submission, to
11 carry greater weight.

12 Sir, those then are our submissions as CTI on the
13 factors that bear upon the exercise of your discretion.
14 Ultimately, how you balance them is a matter for you.
15 However, it seems to us that a number of the most
16 important factors, including whether granting CP status
17 to the survivors would add to the inquiry achieving its
18 aims, whether the survivors would bring a different or
19 unique perspective if granted CP status, the effect on
20 the management and progress of the inquiry if the
21 survivors are designated as CPs, the need to avoid
22 unnecessary cost and the ability of the survivors to
23 engage with, contribute to and participate in the
24 inquiry without being designated as CPs all weigh
25 heavily against the application.

1 To the third of the three questions, namely the
2 relevance of Articles 2 and 3; we're now at paragraph 83
3 of CTI's written submissions at page 93 of the
4 circulated bundle.

5 Your discretion whether to grant core participant
6 status may be limited by the obligation under
7 section 6.1 of the Human Rights Act not to act
8 incompatibly with Convention rights, including
9 Articles 2 and 3. If the survivors' Article 2 and 3
10 rights would be breached without designation as CPs,
11 that would require them to be designated in our view.

12 However, in our submission, even if the Article 2
13 and/or 3 rights of the survivors, or some of them, are
14 engaged, it does not necessarily follow that such
15 engagement requires CP designation.

16 In their written submissions, the survivors state
17 that their rights under Articles 2 and 3 are:

18 "... unquestionably engaged as [they] fall [it is
19 suggested] into a near miscategory of persons who
20 suffered near-death experiences."

21 In those circumstances, the inquiry has the means,
22 it's suggested, by which their near-death experiences
23 will be investigated and there is therefore
24 a requirement, it is argued, for the survivors to be
25 able to participate effectively in the inquiry. This in

1 turn, Ms Campbell argues, requires CP status.

2 In our submission, that analysis oversimplifies the
3 position and it's not one that we as CTI accept. In
4 summary, in our submission, the position is as follows.
5 As coroner during the inquests, you sir, ruled that
6 Article 2 is engaged in respect of the deceased. The
7 Article 2 and 3 rights of some of the survivors are
8 therefore likely to be engaged in our view. Those who
9 suffered very serious injuries fall into this category;
10 those who suffered more minor injuries do not. There
11 are likely to be survivors who fall between those two
12 points on the spectrum and whose cases would require
13 careful consideration.

14 Sir, we have not sought and not thought it necessary
15 for the purposes of responding to this application to
16 identify those who would and would not fall into each
17 category.

18 If the Article 2 and 3 rights of some of the
19 survivors are engaged, the investigative and/or
20 procedural duties arise, requiring the state to put in
21 place an effective investigation. That much we agree
22 with. That investigation should allow for the effective
23 participation of the victims.

24 However, in non-fatal cases the requirements of the
25 investigative duties are more flexible and less

1 stringent than in fatal cases. The requirements of
 2 effective participation may be less than would be
 3 required in a fatal case and the procedural duties may
 4 be met by a combination of investigative measures that
 5 have been put in place by the state.

6 There is no requirement for the procedural duty to
 7 be met by a simple investigation and the fact that the
 8 inquiry has been established to investigate, we say
 9 again, the deaths of those killed in the arena attack
 10 does not mean that it can or should necessarily be the
 11 means by which the survivors' Article 2 and 3 rights are
 12 met.

13 But for those survivors whose Article 2 and 3 rights
 14 are likely to be engaged, the inquiry is not an
 15 investigation into the circumstances into which they
 16 were physically and mentally injured, as has been
 17 suggested in the written submissions of the survivors.

18 As can be seen from its terms of reference, the
 19 inquiry is not an investigation into the circumstances
 20 in which the survivors were physically and mentally
 21 injured. It is an investigation into how and in what
 22 circumstances 22 innocent people came to lose their
 23 lives in the attack at the Manchester Arena.

24 So as is clear, and as we have emphasised without
 25 apology, the focus of this inquiry is on those who died,

1 not on those who survived.

2 To the extent that the inquiry will investigate the
 3 event that caused the survivors' injuries, it is
 4 important to note that the inquiry is not the means by
 5 which the arena attack will be investigated. Rather it
 6 is one of numerous mechanisms that the state has already
 7 put in place to investigate the attack while other
 8 relevant mechanisms also remain available, an issue to
 9 which we'll turn.

10 But in summary, in our view, taking these mechanisms
 11 together, including the degree of participation
 12 available within the inquiry, the survivors' rights to
 13 effective participation will be met without CP
 14 designation. So there is therefore no requirement under
 15 section 6.1 of the Human Rights Act to grant the
 16 survivors, or any of them, core participant status.

17 Sir, we're not far from the end of our submissions.
 18 But given the importance of this particular issue,
 19 namely Convention engagement to the survivors, it is
 20 necessary for us to develop a point in a little further
 21 detail, as we have done in our written submissions.
 22 We'll do so by reference to a number of points.

23 First, you have ruled that the circumstances of the
 24 Manchester Arena attack give rise to an arguable breach
 25 of the Article 2 rights of the deceased. That is to say

1 that it appears that the substantive obligations under
 2 Article 2 have been or may have been violated and it
 3 appears that agents of the state and/or systemic defects
 4 in the state system are or may be in some way
 5 implicated.

6 In these circumstances, an arguable breach of the
 7 Article 2 and 3 rights of some of the survivors is
 8 likely to arise because, on the authorities,
 9 a potentially fatal incident resulting in serious but
 10 non-fatal injury engages Article 2, and by extension
 11 Article 3, provided the relevant severity threshold is
 12 met.

13 Second, where there is an arguable breach of
 14 Article 2 in a fatal case, a procedural obligation
 15 arises requiring an effective investigation into the
 16 death or deaths in question. The purposes of this
 17 investigation are, as was made clear in the leading case
 18 of Amin:

19 "To ensure so far as possible that the full facts
 20 are brought to light; that culpable and discreditable
 21 conduct is exposed and brought to public notice; that
 22 suspicion of deliberate wrongdoing, if unjustified, is
 23 allayed; that dangerous practices and procedures are
 24 rectified; and that those who have lost their relatives
 25 may at least have the satisfaction of knowing that

1 lessons learned from his death may save the lives of
 2 others."

3 It has also been suggested in both common law and
 4 Article 2 and 3 case law that in certain circumstances,
 5 the investigation should contribute to the victims'
 6 sense of catharsis and resolution and to the restoration
 7 of human dignity.

8 An Article 2 investigation must meet a number of
 9 minimum requirements, including the effective
 10 participation of the victims. Effective participation
 11 may include being provided with disclosure, the
 12 availability of funded representation, the ability to
 13 ask questions and/or suggest lines of enquiry or
 14 questioning, and an ability to attend hearings at which
 15 evidence is given.

16 There is a degree of flexibility on the authorities
 17 as to what Article 2 will require in a given case. So
 18 for example, there is no fixed requirement that an
 19 Article 2 investigation must allow the next of kin to
 20 cross-examine witnesses or receive all disclosure at
 21 a particular point in the investigation. And the
 22 authorities for all of those propositions, sir, are
 23 addressed in our written submissions.

24 Third, in a non-fatal Article 2 case, or an
 25 Article 3 case, a procedural obligation may also arise

1 requiring an effective investigation . It is settled law
 2 that the requirements of such an investigation ,
 3 including effective participation for the victims, are
 4 more flexible and less stringent than in fatal cases, in
 5 part because death adds a further dimension of gravity
 6 compared with non-fatal cases, as it was put in R (JL) v
 7 Secretary of State for Justice 2009, 1 EWCA cases,
 8 page 588 at paragraph 105.

9 What is required to meet the investigative duties
 10 will depend upon inter alia the severity of the
 11 ill -treatment in question and the gravity of the
 12 circumstances in which it occurred, including whether
 13 the perpetrator was or was not a state agent.

14 Depending on the gravity of the case, effective
 15 participation may require, for example, funded
 16 representation and the ability to suggest lines of
 17 enquiry and/or questioning. But in other cases, the
 18 requirement for effective participation may be less
 19 exacting.

20 In a non-fatal Article 2 or Article 3 case,
 21 compliance with the procedural duties is assessed,
 22 importantly, against the totality of the investigative
 23 measures that are in place, including those that may be
 24 relied upon in future, for example civil proceedings.
 25 That, we pause to observe, is an important factor in

1 this case.

2 Fourth, the question in respect of those survivors
 3 whose Article 2 and 3 rights are likely to be engaged
 4 is, of course, whether the Article 2 and 3 procedural
 5 obligations require CP designation to ensure that their
 6 rights to effective participation are met. In our
 7 submission they do not.

8 The following factors are relevant to that
 9 assessment.

10 1, the fact that the injuries sustained by the
 11 survivors were caused by a private individual , not an
 12 agent of the state. In assessing the gravity of the
 13 circumstances in which the arguable breaches of
 14 Article 2 and 3 occurred and what is therefore required
 15 to meet the investigative duties , that is a relevant
 16 factor .

17 2, the greater flexibility in how the procedural
 18 duties are met in non-fatal cases. There are a number
 19 of particular features of the Manchester Arena Inquiry
 20 that mean, when assessed in the round, that the
 21 requirement for effective participation of the survivors
 22 will , we submit, be met without the grant of CP status.
 23 These include the inquiry is being conducted by an
 24 independent and experienced chairman, you sir , assisted
 25 by an independent and experienced legal team.

1 The inquiry has broad terms of reference and will be
 2 a thorough and exacting investigation of the arena
 3 attack. The terms of reference are focused on the
 4 deceased with no reference to the survivors . The
 5 bereaved families are core participants . They are
 6 actively engaged in the inquiry , their interests are
 7 likely to overlap very significantly , or indeed
 8 completely, with the survivors , and they are in receipt
 9 of public funding in order to participate effectively .

10 The active involvement of the bereaved families is
 11 likely to contribute to a robust investigation as well
 12 as a perception that the investigation has been
 13 independent and exacting. The active involvement of the
 14 bereaved families means that there is already
 15 substantial victim input into the inquiry and it is
 16 therefore not essential that the survivors are granted
 17 CP status to ensure that such victim input is present .
 18 None of the bereaved family groups positively support
 19 the survivors ' application . All express concerns about
 20 its implications and two of the three groups oppose the
 21 application .

22 The impact on the inquiry if the qualifying
 23 survivors were granted CP status may be relevant
 24 particularly as any delay into the inquiry caused by the
 25 survivors is relevant to the satisfaction of the

1 Article 2 and 3 rights of the bereaved and the survivors
 2 to a prompt investigation .

3 3, the ability of those survivors whose Article 2
 4 and 3 rights are likely to be engaged to engage with,
 5 contribute to and participate in the inquiry without
 6 being designated as CPs is relevant and is an issue that
 7 we have, of course, already addressed.

8 Even if Article 2 and/or 3 is found to be engaged,
 9 in circumstances where the applicant has not suffered
 10 fatal injuries , it does not follow that Article 2 and/or
 11 3 necessarily require CP designation, particularly where
 12 there are other ways in which the applicant can
 13 participate in the inquiry .

14 4, the totality of the investigative measures that
 15 have considered the Manchester Arena attack or could do
 16 so in future is also relevant. This, sir , in our
 17 submission, is an important point. There have been
 18 extensive investigations into the arena attack. These
 19 include the criminal investigation of Greater Manchester
 20 Police, the criminal proceedings recently concluded
 21 against Hashem Abedi, the Anderson report, the Kerslake
 22 report , the report of the ISC and the report by Max Hill
 23 Queen's Counsel. There remain moreover the possibility
 24 of disciplinary proceedings and the availability of
 25 civil proceedings.

1 5, the extent of the survivors' involvement in the
 2 previous investigations that have taken place is
 3 relevant.

4 Sixth and finally, the degree of interest and
 5 engagement the survivors have shown in the inquiry and
 6 the proceeding inquest to date; we've dealt with that
 7 issue of course already and we hope sensitively.

8 So sir, taking the above mechanisms together,
 9 including the degree of participation available within
 10 the inquiry, the survivors' rights to effective
 11 participation will be met without CP designation in our
 12 view.

13 So, sir, at an early stage of these submissions, we
 14 posed three questions, which we hope we've answered in
 15 the course of the submissions that we've made.

16 Question 1: do the survivors satisfy the criteria
 17 within rule 5.2? Answer: yes, some certainly do and for
 18 the purposes of this application you should proceed on
 19 the basis that all do.

20 Question 2: if they do, or some of them, how should
 21 you exercise your discretion? Answer: in our
 22 submission, the factors weigh heavily against the grant
 23 of core participant status.

24 Question 3: do Articles 2 and 3 of the European
 25 Convention of Human Rights make any difference to the

1 outcome in the circumstances of this case? Answer: for
 2 the reasons we have given, no.

3 So those are the submissions that we wish to make at
 4 this stage, although we reserve the right, if necessary,
 5 to make further submissions in response in due course.

6 We're going to invite submissions next, as we
 7 indicated from Ms Campbell Queen's Counsel, on behalf of
 8 the survivors.

9 Sir, may I enquire before I do so whether Mr Seddon,
 10 the stenographer, would welcome a short break at this
 11 stage.

12 SIR JOHN SAUNDERS: We were going to have a break anyway,
 13 whether you wanted one or not, so we'll break for
 14 15 minutes until 11.45. In the meantime, could I ask
 15 that the live link is cut and everyone is muted so that
 16 we're not listening to everyone else's conversations.
 17 Thank you. So 11.45.

18 (11.30 am)

(A short break)

20 (11.45 am)

21 SIR JOHN SAUNDERS: If we're ready to start again, please.

22 Thank you. If I can invite Ms Campbell now to make her
 23 submissions.

24 Ms Campbell, just as I didn't with Mr Greaney,
 25 I will not interrupt your submissions. There may be

1 questions I'd like to ask you afterwards, so we'll deal
 2 with it that way, if that is all right.

3 MS CAMPBELL: Thank you very much.

4 SIR JOHN SAUNDERS: Thank you.

5 Submissions by MS CAMPBELL

6 MS CAMPBELL: Sir, can I indicate at the outset, on behalf
 7 of those who make this application for core participant
 8 status, that we are grateful for this opportunity,
 9 firstly, to make oral submissions in support of the
 10 application, but to do so in extraordinary
 11 circumstances, and we are under no illusions that all
 12 involved have gone to considerable lengths to facilitate
 13 this hearing. For that both I and those who are
 14 represent are grateful.

15 This is the first time, almost 3 years after the
 16 atrocity of 22 May 2017, that those whom I represent
 17 have been formally represented in legal proceedings
 18 relating to the attack and have had someone to speak on
 19 their behalf. So it's right that the first thing that
 20 I should do is, on their behalf, to acknowledge and pay
 21 tribute to those who died and to the family members who
 22 continue to mourn them.

23 The survivor applicants, you will know, sir, are
 24 conscious that this application may well have caused
 25 some degree of concern or apprehension amongst the

1 bereaved families, indeed such is mentioned in the
 2 written submissions. Any apprehension is a matter of
 3 regret.

4 As we indicated in our written submissions, and we
 5 do so orally, the applicants have the greatest of
 6 respect for the bereaved family members and they
 7 recognise from the outset that the bereaved families
 8 occupy, and rightly occupy, a unique role and must at
 9 all times remain at the heart of this inquiry.

10 In seeking to persuade you to also make room in this
 11 inquiry, at this table for the participation of the
 12 survivor applicants, nothing that I say should be
 13 interpreted as in any way seeking to undermine the
 14 central status of the bereaved.

15 Sir, to assist all parties I will seek to structure
 16 my submissions in line with those you've already heard,
 17 namely in line, in large part, with the submissions of
 18 your team at tab 10 of the bundle. When in a moment,
 19 I turn to address you as to the substance of this
 20 application, I will endeavour to do so by referring to
 21 that comprehensive document alone. Should I need to or
 22 be requested to refer to any aspect of any other party's
 23 submissions not reflected in that document, of course
 24 I will do so. But hopefully, given the set-up of these
 25 proceedings, I will avoid undue shifting between papers.

1 Before I do so, can I extract three issues from that
2 document that have caused some degree of concern amongst
3 the survivor applicants and deal with them upfront.

4 Firstly, I hope it hardly needs to be articulated
5 that this application is of the utmost importance to the
6 survivors. One only needs to glance at the summaries
7 provided in support of the application to appreciate
8 that the survivors have lived and continue to live with
9 the consequences of the attack on a day by day, minute
10 by minute, decision by decision basis.

11 For many, their lives are marked by permanent
12 disability, by physical scars, by constant pain, and
13 even to this day medical procedures and ongoing
14 surgeries.

15 For others, although physical injuries may have
16 healed, the trauma continues to afflict their mental
17 health. None of that, of course, undermines that which
18 has been experienced by the families.

19 But for all of the physical and mental trauma, the
20 questions that plague those whom I represent remain: why
21 did this happen, how was it allowed to happen, what if
22 things had been different? The importance of
23 participating, of being represented, of having a voice
24 in a process that seeks to answer some of those
25 questions cannot be understated and cannot be

1 overstated.

2 The second issue is the extent that it is suggested,
3 as it appears to be, that the survivors have not shown
4 sufficient interest in the proceedings to date and this
5 is a factor that may weigh against them in this
6 application. Of course, we have heard the sensitivity
7 with which it has been set out this morning, but may
8 I seek on their behalf to set the record straight.

9 Again, I hope it need hardly be said that in the
10 days, weeks and months after this atrocity, the
11 survivors were trying to survive, to recover, to figure
12 out what life was going to mean for them in future.
13 Many remained in hospital for months. Others were
14 discharged eventually to round-the-clock care. Others
15 were learning to cope in a world that they had never
16 previously conceived of.

17 Again, I do not seek for a moment to undermine the
18 experience of the bereaved, who are doubtless in
19 unspeakable pain. But at a time when we know that
20 bereaved families are drawn together by grief through
21 coronial investigations, through police investigations,
22 through family liaison officers and so on, the survivors
23 were isolated by their injury.

24 Where they were asked to do so, they gave statements
25 to the police, those statements focusing on specific

1 aspects of the criminal investigation that was ongoing.
2 Where they were able to do so, and not because they were
3 invited but because they sought access themselves, they
4 contacted the NSPCC, and some, albeit a small number,
5 were able to contribute to the Kerslake report.

6 But since statements were signed and comments were
7 made, the survivors have had no role and indeed no one
8 to help them identify a role in the ongoing proceedings.
9 In the main, they didn't know each other, save for those
10 who were attending together and were injured together.
11 They had no family liaison officers to keep them abreast
12 of proceedings. Again, they have had no contact with
13 GMP beyond signing statements and sometimes, in some
14 cases, as much as two and a half years ago.

15 They were, of course, aware of the inquest
16 proceedings, they were aware of the extradition
17 proceedings, they were aware of criminal proceedings,
18 but for many, not least because of their physical and
19 mental disabilities, the only window through which these
20 proceedings were accessible was an Internet browser.

21 Some participated or sought to support bereaved
22 family members in their campaigns, some, for example,
23 were active in the campaign for Martyn's Law to ensure
24 that public venues trained their staff in
25 counter-terrorism measures.

1 But it was when the criminal proceedings started
2 towards the end of last year and proceeded this year, it
3 was at that point that the survivors travelled to
4 London, some of them notwithstanding significant
5 physical disability, and met each other in the public
6 gallery of the Old Bailey, spoke to family members of
7 those who had died, and began to appreciate that they
8 may have a voice and, indeed it should be said, that
9 their voice and their experience would be welcomed by
10 those of the bereaved families whom they met.

11 But to characterise those who had previously felt
12 voiceless, previously felt unrepresented, as those who
13 had opted to be silent or opted not to engage would be
14 to do a disservice both to individuals and indeed to
15 this application. Therefore where it is contended that
16 you should consider that insufficient interest had been
17 shown in these proceedings to date, I would ask you to
18 resolve that on every occasion in favour of the
19 applicants.

20 They were interested, they displayed their interest
21 in every way that they could, and they have since sought
22 to make what they believe to be impenetrable proceedings
23 proceedings that they can now participate in.

24 Thirdly, can I make this point. We do not ask for
25 the purposes of this application that you consider an

1 expansion of your terms of reference and we do not, nor
 2 have we at any stage in the application, sought on the
 3 survivors' behalf to seek a diversion into their own
 4 experiences of their own medical journeys, their own
 5 injuries, what happened to them in medical care terms,
 6 save where it might assist you and indeed the families
 7 in the inquiry that will be commencing, we hope,
 8 in September.

9 The survivors are well aware of their own medical
 10 journeys. They have in some cases very lengthy medical
 11 files. You will have considered, no doubt, the
 12 summaries with care. No complaint is made in them,
 13 you will note, for the purposes of this inquiry nor,
 14 should I say to my knowledge, at all that the medical
 15 attention that they received, having left the arena, was
 16 anything other than adequate. That is not an aspect
 17 that we would ask you on their behalf to consider, save,
 18 and it's an important point, where their experiences
 19 provide information, evidence or assistance to
 20 understand either the experiences of those who died or
 21 to ensure that lessons are properly learned, as is also
 22 a function of this inquiry.

23 So this application is advanced on the basis that
 24 the survivors can make meaningful, significant and
 25 important contributions within the existing terms of

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1 reference and can add to the purpose of the inquiry.

2 So may I turn, please, to the purpose of the
 3 inquiry? You had put up on the screen during
 4 Mr Greaney's submissions the letter or extracts of the
 5 letter, your letter, sir, to the Home Secretary inviting
 6 the Home Secretary to establish the inquiry. That
 7 letter -- and I don't ask it to be put up again -- makes
 8 clear that:

9 "It is a matter of vital public importance that an
 10 Article 2 compliant investigation that is full, fair and
 11 fearless is conducted into the terrible events that
 12 resulted in the death of 22 people killed in the arena;
 13 that it is vital that that inquiry allows families to
 14 understand the circumstances in which their family
 15 members were killed and to ensure that the wider
 16 circumstances of the attack are properly investigated."

17 We have reminded you, sir, at paragraph 17 of our
 18 written submissions, which are at tab 9 in the bundle,
 19 of the response by the Home Secretary in relation to
 20 your letter. She observed in October of last year that:

21 "It is vital that those who survived or who lost
 22 loved ones in the Manchester Arena attack get the
 23 answers that they need and that we learn lessons,
 24 whatever they may be."

25 She observed that:

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1 "This process is an important step for those
 2 affected as they look to move on from the attack and
 3 I know that they want answers as quickly as possible.
 4 I am determined to make this happen while ensuring that
 5 proper processes are followed and now that the coroner
 6 has decided that an inquest cannot possibly investigate
 7 the deaths, I have agreed to establish an inquiry to
 8 consider all of the information so that he can make
 9 appropriate recommendations."

10 There is, we say, in that announcement from the Home
 11 Secretary, on behalf of the Government, establishing
 12 this public inquiry an acknowledgement that those who
 13 survived -- and of course those who lost loved ones --
 14 have questions, questions that must be answered and,
 15 from the experiences of both, lessons must be learned.

16 So it was that after that announcement, you, sir,
 17 established the inquiry with the purpose of
 18 investigating how and in what circumstances 22 innocent
 19 people came to die and make such recommendations as seem
 20 appropriate. The latter purpose may well flow from the
 21 former, but they are two distinct functions that must be
 22 fulfilled for the inquiry to achieve its overall
 23 purpose.

24 We say clearly that it is within the terms of this
 25 inquiry and within the scope of the inquiry that the

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1 survivor applicants are able to get answers that they
 2 need as per the acknowledgement of the Home Secretary,
 3 but also will assist you in the dual functions of this
 4 inquiry. The survivor applicants, in terms of the
 5 information that they have, the evidence that they can
 6 give and the contribution that they can make will allow
 7 the families, or at least some of the families,
 8 a greater understanding of how their loved ones died and
 9 will ensure that the wider circumstances are
 10 investigated with consideration of all the available
 11 evidence, both of which are of importance in ensuring
 12 this inquiry advances with public confidence.

13 May I make clear in saying that that we do not say
 14 that you, sir, have to hear or incorporate all the
 15 available evidence from survivors, very far from it.
 16 Of course you don't. But firstly, such evidence as is
 17 available needs to be considered for its value to the
 18 purposes of the inquiry. Secondly, that which adds
 19 value needs to be heard. Thirdly, where appropriate, on
 20 the basis of the evidence of the survivors and the
 21 experience of the survivors, evidence from other
 22 participants should be tested through questioning on
 23 their behalf.

24 May I please explore that with reference to one
 25 paragraph in the CTI's submissions? And you will, and

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1 doubtlessly all will understand, sir, that these
2 submissions are made on the basis of the information
3 that we have. The survivors have not had access to
4 disclosure by any means and are reliant on that which
5 has been made public to date.

6 But one aspect, in my submission, provides some
7 assistance in understanding the contribution that the
8 survivors can make. I'd ask you, sir, to turn to
9 paragraph 14 at page 51 of the bundle. Paragraph 14
10 makes clear that in May 2019, so some 11 months ago, on
11 your behalf, solicitors circulated a note to all
12 interested persons, as they were then, in relation to
13 the emergency response aspect of this inquiry. The note
14 clarified the approach to be taken to scope issue 7,
15 which is identical to that which is in the inquiry's
16 terms of reference, and it explained in detail the
17 approach that will be taken in investigating the
18 emergency response.

19 In particular, IPs, as they then were, were informed
20 that the investigation of the response would focus on
21 the deceased, and that:

22 "In order to keep the number of potential further
23 witnesses accounts that need to be obtained within
24 proportionate bounds, we will focus on obtaining
25 accounts from those who were involved in the emergency

1 response at the time of the first 999 call reporting the
2 attack ..."

3 And I pause there to observe that that call surely
4 came from or certainly one of the initial calls would
5 have come from survivors:

6 "... until 3 o'clock in the morning of 23 May 2017.
7 This is at a time shortly after the last living casualty
8 was removed from the arena and taken to hospital."

9 The last living casualties are represented in the
10 summaries that you will have considered:

11 "The inquest [as it then was] understood that the
12 last living casualty would have been removed at around
13 02.46 on 23 May 2017. It is understood that the last
14 deceased person was declared life extinct some time
15 before this, at 00.30.24, and the time of 3 am on 23 May
16 will therefore, it is hoped [on the next page] ensure
17 that all available witness evidence on the emergency
18 response is obtained as far as it touches on the
19 circumstances of each person who died."

20 We can take that down, but we note, briefly, in the
21 next paragraph that no one suggested that that was an
22 unreasonable approach to take.

23 But we note that since that paragraph was drafted,
24 having looked at some of the transcripts, we can infer
25 that the inquiry has had the benefit of numerous

1 statements from emergency medical responders, from
2 first - aiders, whether they were engaged on behalf of the
3 arena, whether they were acting on behalf of the
4 ambulance service, whether they were acting on behalf of
5 hospitals or the police force. We anticipate that
6 you will have heard evidence about liaison between
7 agencies, about protocols that would have applied, about
8 triages that would have been set up, but you will not
9 have had, we venture to suggest, any statements from
10 survivors for this reason because none has been sought.

11 None of those whom I represent have been approached
12 by this inquiry to date to ascertain what evidence of
13 value they may have, and all of those whom I represent
14 have evidence of value to that period of up to 3 o'clock
15 in the morning in terms of how and in what circumstances
16 the deceased met their death.

17 We can further infer -- may I say, that we are
18 grateful for the considerable assistance that your team
19 have given us in providing summaries of the evidence,
20 that which is within the disclosure on your system, and
21 the cooperation that they have shown in adding further
22 information on behalf of those whom we represent.

23 But we infer from this process that this application
24 has prompted consideration of the survivor evidence in
25 detail for what appears to be the first time. Indeed,

1 we note in the submissions of Hogan Lovells at
2 paragraph 11, it is observed that:

3 "It is not possible to discern the precise
4 involvement and impact of the attack on each of the
5 applicants from the material currently on the Opus
6 system."

7 Any perception of criticism of the failure to
8 adequately consider the value of survivor evidence must
9 be tempered by the acknowledgement that such statements
10 as appear to be within your possession and disclosed
11 were taken at a different time and for a different
12 purpose.

13 Some, as I've already mentioned, were taken to
14 assist the police investigation for the prosecution of
15 Mr Abedi more recently at the Old Bailey. In relation
16 to some, the value of the evidence of that individual to
17 this inquiry may not be immediately obvious from
18 consideration of a statement given at that moment in
19 time for the purpose that it was being obtained.

20 May I give you six examples of that. The first is
21 Andrea Bradbury's. She is at number 5 in the witness
22 summaries. I do not ask that any of these summaries are
23 put up on the screen.

24 Mrs Bradbury is a police officer, but her statement
25 does not indicate that the evidence that she can give is

1 given from the perspective of a police officer with
 2 30 years' experience, including the last 8 at an
 3 inspector level within a counter-terrorism role. Her
 4 statement does not detail the efforts on her part to
 5 speak directly to the on-call counter-terrorism DC for
 6 Lancashire to provide all the information that she
 7 could, having been a victim to the blast, having been
 8 within metres of Mr Abedi, having seen him in the
 9 moments before the bomb was detonated. She sought to
 10 give evidence, including that the blast was not firearms
 11 related, the number of casualties, the entrances and
 12 exits to the arena, and that she had not seen firearms
 13 at the scene, but that's not detailed in her statement.

14 If it had been, it might have led -- well, the
 15 question then becomes: was that information that she was
 16 able to give considered adequately or at all in the
 17 emergency medical or indeed the emergency police
 18 response? If it had been, might it have led to a
 19 swifter and clearer entrance to the arena by the police
 20 and emergency services?

21 The second example is that of 8-year-old
 22 Lily Harrison, who's at number 20. Her statement does
 23 not make clear that she arrived at the Manchester Royal
 24 Infirmary Children's Hospital having been transported
 25 in the back of a police van due to the nature of her

1 injuries, but at the time of her arrival the hospital
 2 was unaware that a major incident had occurred at the
 3 arena, which at the time, of course, was host to
 4 a concert attended in the main by children.

5 The third, fourth and fifth examples relate to the
 6 triaging of casualties. At number 16, Gary Blamire's
 7 statement does not contain the information that having
 8 been triaged in category 2, teams appear to have
 9 forgotten about him and moved on to category 3, leaving
 10 him until such time as he had to shout, and
 11 notwithstanding his injuries, to bring himself to their
 12 attention, causing a flurry of activity in his
 13 direction.

14 At number 38, Emily Murrell, the daughter of
 15 Ruth Murrell, who had attended with Michelle Kiss, was,
 16 it seems, wrongly categorised in tier 2 when doctors
 17 confirmed that she ought to have been in tier 1. That
 18 wrong categorisation meant that that child lay in
 19 Victoria Station until after 2 am in the morning, all
 20 the while losing blood and needing to be transported
 21 with emergency sirens to the hospital.

22 Again, on the issue of triage, Linda Carter at
 23 number 50 was one of the last to be evacuated, so some
 24 time close we suggest to the 2 am mark, and this was
 25 notwithstanding that she had to be resuscitated in the

1 ambulance, and her surgeon went on to tell her that she
 2 was one of the worse cases that he had seen.

3 Finally, in this category of evidence that we say
 4 the inquiry would be bereft without, Martin Hibbert.
 5 You will be aware that Martin and his daughter, Eve,
 6 were both catastrophically injured.

7 In his statement that the inquiry has, he bears
 8 witness to the fact that his child was covered for dead
 9 when he knew she was still alive, and he had to
 10 intervene to stop that happening. But his statement
 11 does not focus on the decision of an experienced
 12 paramedic to override protocol in taking him to Salford
 13 General Hospital rather than Wythenshawe
 14 General Hospital that they were directed to and that
 15 decision by that experienced paramedic very probably
 16 saved his life.

17 Was that a decision that demonstrates that the
 18 protocol was sufficiently flexible to deal with the
 19 nature and emergency of the situation or is it evidence
 20 that, but for the fact that Mr Hibbert had the good
 21 fortune to be cared for by a paramedic with 35 years'
 22 experience and the courage that goes with it, he might
 23 also be among the deceased?

24 Those are, we suggest, just six examples of others,
 25 many others, that ought to be considered and ought to,

1 we suggest, have been considered within the emergency
 2 response section of this inquiry that has been referred
 3 to in correspondence back to May 2019 between the
 4 parties.

5 But as things presently stand, your inquiry into
 6 that emergency response does not allow for that material
 7 to be considered. In fact, until this application it
 8 did not consider whether the material ought to have been
 9 properly considered, we suggest.

10 When that note was issued and circulated amongst the
 11 IPs, now the core participants, no one but no one
 12 reached out to the survivors to determine the value of
 13 their evidence within the window of that important
 14 emergency response and to put the evidence that you may
 15 well have received from agencies, from professionals,
 16 into context.

17 So I ask you, sir, when you read and when you
 18 consider, and as you will no doubt have done, the
 19 suggestion on more than one occasion that has been made
 20 that the survivors can participate by being witnesses --
 21 indeed it's now said that their witness evidence would
 22 be welcomed by your inquiry -- we ask you to bear in
 23 mind that until 28 January, until the end of January
 24 this year -- this inquiry was due to start yesterday,
 25 and until very, very recently it was due to start in

1 mid-June, which is just 10 weeks from now -- and no one
2 had approached the survivors to ask any of those whom
3 I represent for a witness statement, much less to make
4 arrangements for them to give evidence.

5 I respectfully suggest that given the importance and
6 the value of what they can bring to this inquiry, it
7 should not be left to individual survivors to make
8 contact to ask whether their experience is of value. On
9 the contrary, it should very much be the other way
10 round.

11 Having said that, may I make clear that we do not
12 suggest that the information detailed as I have just
13 done in relation to those six, or indeed the other added
14 value that we suggest can be found in the summaries and
15 beyond, because the survivors have a great deal more to
16 offer -- we do not suggest that that information should
17 necessarily involve a lengthy process of giving
18 evidence, of calling multiple witnesses or indeed, as it
19 has been termed by your counsel in their written
20 submissions, far-reaching consequences.

21 All of the information that the survivors can give,
22 we acknowledge, must go through, we suggest, three
23 filters. Firstly, is it information that assists the
24 families in knowing how their loved ones died? Does it,
25 for example, go to any issue of survivability that

1 families may be concerned about? Does it go to any
2 issue of triaging that families may have been concerned
3 about or the emergency medical response?

4 Secondly, does the information help us learn
5 lessons? Does it reassure the public that the inquiry
6 has served its purpose in making recommendations from
7 major incidents in future? So does it fulfil or
8 contribute to the second limb of the function and
9 purpose of this inquiry?

10 And if it contributes to one or both of those, how
11 is the evidence best adduced? Does it require oral
12 evidence or can it be considered by other means?

13 Of course, in that latter regard, and in fact in all
14 of those three filters, we would work closely with those
15 representing the bereaved, with your own team and with
16 the other core participants, to ensure that those
17 filters are in place and the contribution is
18 a contribution that is necessary, that is valuable, and
19 indeed is proportionate to the aims of this inquiry.

20 We acknowledge, and we have acknowledged, I hope, in
21 our written submissions, that this may involve some
22 additional work on the part of the inquiry. It may
23 involve additional disclosure. It may involve the
24 taking of additional witness statements from survivors
25 whom we identify or at least we assist in identifying.

1 It may, I don't know, involve expert witnesses. It
2 probably involves questioning of some of the witnesses
3 who are to be called to your inquiry on the survivors'
4 behalves and in line with the survivors' experience.

5 But we suggest that without consideration of the
6 evidence that survivors can offer, this inquiry, and we
7 venture to suggest the bereaved families, would be
8 disadvantaged. Certainly, as we put it in our written
9 submissions, this inquiry would be considerably the
10 poorer.

11 Questions the families may have or indeed questions
12 that the inquiry must answer about survivability, about
13 adequacy of the emergency response, might remain
14 unanswered or might be inadequately answered, and if
15 that is the case then lessons that should be learned may
16 not be.

17 Sir, I want to turn in a moment to the ten matters
18 that have been brought to your attention as to the
19 exercise of your discretion. Before I do so, can
20 I acknowledge that you have been assisted and we have
21 been assisted in the submissions, both written and oral
22 from your counsel as to the application of the law, as
23 to the application of rule 5, and that is undoubtedly in
24 the main agreed.

25 That law is set out at page 65 onwards of CTI's

1 submissions and your attention has been drawn to it this
2 morning. We have proceeded to date, and we continue to
3 proceed, on the understanding that no party suggests
4 that those whom I represent, or at least some of them,
5 do not have sufficient interest within the meaning of
6 rule 5 and in terms of the approach that is suggested by
7 your counsel to consider this application in the round
8 at this stage rather than on an applicant-by-applicant
9 basis, we don't demur from that approach. Indeed, we
10 see the sense in it.

11 But we do say at this stage that although our
12 primary submission is that all those who make this
13 application for core participant status merit it, and
14 all those come within the sufficient interest test in
15 rule 5, equally we acknowledge that we don't shy away
16 from a process that involves consideration of individual
17 applications should it become necessary. That is the
18 selection process referred to at paragraph (e) on
19 page 71 of CTI's submissions. We don't invite you,
20 of course we don't, to engage in that process at this
21 juncture, but if it becomes necessary to do so, we stand
22 ready to assist.

23 So we turn to the exercise of your discretion and
24 ten factors have been brought to your attention and I'll
25 endeavour in some detail to deal with those which we

1 consider most important.
 2 The factors you will be aware of. Firstly, the
 3 views of the bereaved families. Secondly, the views of
 4 other core participants. Third, what I'm calling the
 5 wider public interest test or the wider public
 6 consideration. Fourthly, whether the survivors may
 7 assist the inquiry in fulfilling its aims. Fifthly,
 8 a unique perspective that is brought. Sixth, whether
 9 their contribution is so substantial as to require core
 10 participant status. Seven, the impact on the
 11 proceedings, which includes eight and nine, so the three
 12 aspects, whether it will occasion a delay in start,
 13 whether there will be delays to pre-inquest disclosure,
 14 pre-inquiry disclosure, or protracted hearings when the
 15 inquiry commences. And finally, tenth, whether there
 16 will be an impact on facilities at the venue.

17 May we deal immediately with the views of the
 18 bereaved families because we acknowledge undoubtedly
 19 that those will be influential, indeed they've been
 20 carefully considered by the core participants, the
 21 survivors who I represent in making this application.

22 I've already acknowledged, and I do again, that the
 23 bereaved families must come front and centre of this
 24 inquiry and there will be no endeavour on the part of
 25 any of those who I represent to dilute their central

1 status. But we make the following observations.
 2 Those submissions that you have had, Mr Cooper and
 3 Slater & Gordon solicitors undoubtedly and clearly
 4 oppose the application. Mr Atkinson in his submissions,
 5 we suggest, is more nuanced and he raises a number of
 6 aspects of concern and we have endeavoured to deal with
 7 those aspects of concern. Mr Weatherby in his
 8 submissions adopts a more neutral position on behalf of
 9 the families who he represents. Indeed, Mr Gozem has
 10 adopted, on behalf of the three families he represents,
 11 a neutral position inasmuch as they have not advanced
 12 written or indeed oral submissions.

13 It is the understanding of the survivors whom
 14 I represent that within each of the groups there are
 15 individuals and families who in fact have supported this
 16 application and expressed their support as much to
 17 members of the survivor applicants group.

18 The bereaved and the survivors have been in contact.
 19 They have spent many hours together at the Old Bailey
 20 during the recently concluded criminal trial. They have
 21 been involved in campaigns together such as
 22 Martyn's Law, which I've already mentioned. There is
 23 telephone contact, more recently established, between
 24 them, and indeed, as a result of that, the applicants
 25 have been encouraged to make this application and have

1 been encouraged by the expressions of support that they
 2 have had.

3 But undoubtedly, there are those who are concerned
 4 by it and bereaved families who oppose it and we accept
 5 that. To those, we offer the following assurance:
 6 firstly, and I've said it before and I'll say it again,
 7 this will not undermine their status in any way. But
 8 secondly, the concerns that they have expressed in their
 9 written submissions, and no doubt will be orally
 10 expressed on their behalf, as to the impact of the
 11 survivors should they be granted CP status can be
 12 assuaged. That the concerns, whether they focus on
 13 delay, whether they focus on dilution of the bereaved
 14 experience, or indeed whether they focus on a suggested
 15 diversion into lengthy explorations on what happened to
 16 survivors can be met.

17 Firstly, with your oversight, the terms of reference
 18 to the inquiry will be met and the survivors'
 19 contribution will be made with the aim of assisting the
 20 inquiry and the bereaved families in achieving their
 21 goals. As I've already said, evidence from or on behalf
 22 of survivors or questions posed on their behalf would be
 23 appropriately filtered to ensure that they contribute to
 24 the terms of the inquiry as already set out, and it is
 25 very much the hope of the survivor applicants that in

1 doing so they will contribute to a greater degree of
 2 understanding on behalf of the families as to the
 3 experience of their loved ones where that information is
 4 necessary, but, secondly, that they will support the
 5 families both in terms of, if you like, overlapping
 6 considerations and mutual considerations, and indeed
 7 information that the survivors may have that goes beyond
 8 that which is already before the inquiry to ensure their
 9 questions are answered and to ensure that lessons are
 10 learned.

11 So whilst we say that of course you must bear in
 12 mind the views of the bereaved families, their concerns
 13 as expressed are not such that ought to lead to refusal
 14 of this application because their concerns can be and
 15 indeed will be met.

16 In terms of the views of the other core
 17 participants, we say this: we've already set out what
 18 the Home Secretary stated in establishing this public
 19 inquiry, and in relation to the brief submissions as
 20 advanced by the Home Secretary and indeed by SMG, we
 21 observe that they don't object. There is an
 22 acknowledgement, as it has been across the board, that
 23 those or some of those whom I represent have sufficient
 24 interest and they properly raise considerations that
 25 must be borne in mind, but none of those considerations,

1 whether it's in relation to restriction orders or
 2 whether it's in relation to an undue diversion of the
 3 attention of the inquiry on to the experience of the
 4 survivors are such that ought to weigh against the
 5 survivors in this application .

6 We suggest they offer some support by acknowledging
 7 the impact on survivors and their interest in these
 8 proceedings and at worst they are neutral in that
 9 regard , as indeed we note GMCA have indicated their
 10 neutrality .

11 So can we turn to the additional factor of what
 12 I call the wider public confidence test . We suggest
 13 that this consideration ought firmly to be resolved in
 14 favour of the applicants . The public will undoubtedly
 15 expect that those whose lives had been so
 16 catastrophically affected by the blast are given a voice
 17 and that the inquiry should fully consider the evidence
 18 available from survivors in fulfilling its vital public
 19 function . The question might well arise in the minds of
 20 the public as to why this inquiry cannot accommodate
 21 survivor representation when plainly others can .

22 We note that in the ongoing Grenfell Inquiry there
 23 is a list of over 500 core participants , most of whom
 24 fall into a group of bereaved, survivors and residents .
 25 The breadth of the chairman's ruling in Grenfell means

1 that those who were not residents but who happened to be
 2 staying overnight in the tower block are recognised as
 3 core participants . Those who live in adjoining walkways
 4 to the tower and not in the tower itself are recognised
 5 as core participants .

6 A refusal , we suggest, of this inquiry to recognise
 7 a proportionately small number of survivors represented
 8 by one team might well be viewed by the wider public as
 9 inexplicably restrictive in its approach, particularly
 10 in this case where it has been recognised that the state
 11 obligations to protect life and to minimise risk to life
 12 is engaged.

13 We need no reminding of the impact of this blast on
 14 public confidence , on the confidence of the members of
 15 the public to attend public venues, to allow their
 16 children to attend public venues such as this .

17 When considering the public confidence in this
 18 inquiry , we suggest, sir , that you should conclude that
 19 the public would expect, of course, that the views of
 20 the bereaved and the survivors are considered front and
 21 centre , but that also where survivors can participate ,
 22 they are enabled to participate and the inquiry hears
 23 from them, giving them a place at the table .

24 So we turn to whether this inquiry would be assisted
 25 by the contribution of survivors as core participants in

1 achieving its aims. What would the survivors add?
 2 Would the survivors' perspective be so unique or
 3 different or substantial as to require core participant
 4 status? These are the factors addressed at pages 78 to
 5 85 of your counsel's submissions.

6 Firstly , we note this : the survivors are indeed the
 7 living witnesses . They were in the main in the
 8 City Room before, during and after the attack , and
 9 mercifully they have lived to tell the tale . You will
 10 have seen from the summaries provided that the majority
 11 of those whom I represent were waiting in the City Room
 12 for their friends and family to exit the arena . The
 13 majority of them spent some time in the City Room
 14 observing . They can contribute to questions such as the
 15 adequacy of the security arrangements, the visibility of
 16 any security staff .

17 They witnessed -- many of them witnessed Mr Abedi,
 18 they witnessed stewards' engagement with Mr Abedi . In
 19 some cases they witnessed a lack of engagement with him .
 20 Ms Bradbury saw him without his bag . Others at a later
 21 stage saw him weighed down by a heavy rucksack and
 22 acting incongruously with the environment . They felt
 23 the force of the blast and they witnessed the impact of
 24 it .

25 Those who remained conscious or regained
 1 consciousness spent a very considerable time in the
 2 City Room before being extracted to Victoria Station .
 3 They are the living witnesses to what happened .
 4 Allowing them representation as core participants will
 5 enable proper and adequate consideration of the
 6 information that they have that will assist the bereaved
 7 families in understanding how loved ones died . That
 8 will assist in enabling the inquiry to reach reliable
 9 and comprehensive conclusions , expeditiously reached ,
 10 without undue expense . They and their participation as
 11 core participants will ensure that this process is one
 12 in which the families and the wider public can have
 13 confidence .

14 To that extent , we say with force that the
 15 contribution of the survivors whom I represent as core
 16 participants will make a meaningful contribution to this
 17 inquiry achieving its aims .

18 What would they add? Their participation as core
 19 participants , we suggest, will enhance almost every
 20 aspect within the scope -- the build-up, the planning
 21 and the reconnaissance -- there is within the survivors'
 22 evidence as to that . The attack itself . The events
 23 immediately prior to the detonation . The adequacy of
 24 efforts to identify and remove Mr Abedi as a suspicious
 25 person . As I said, the security arrangements . There is

1 a wealth of evidence as to whether they were adequate or
 2 visible . And the emergency medical response. The
 3 first -aiders and the availability of any first aid
 4 equipment. The initial police response, its adequacy or
 5 appropriateness . The arrival of the paramedics, the
 6 triaging , the mistakes, the delays that were real or
 7 perceived , but nonetheless are questions that will be
 8 asked, and they will assist in identifying good practice
 9 where it is merited.

10 Those who make this application include doctors,
 11 include retired police officers , include members of the
 12 public who, notwithstanding their own injuries , felt the
 13 need to plug a gap in the state 's immediate response,
 14 members of the public who witnessed events for hours as
 15 they lay waiting to be treated .

16 In some cases, they can give evidence as to the
 17 experiences of those who died. Some are witnesses to
 18 those who died. In other cases, their evidence may be
 19 of value to the question of survivability , which you are
 20 considering , in other words whether inadequacies may
 21 have contributed to deaths or whether deaths, as in fact
 22 they were in the case of Martin and Eve Hibbert, were
 23 preventible .

24 The perspective of the bereaved families is unique
 25 and it is powerful because they are at the heart of it .

1 Their perspective is not gained from what they witnessed
 2 through a window or on a passing bus as a casual
 3 observer. Their perspective is gained from the impact
 4 of what they saw, what they felt and what they
 5 experienced.

6 As I have already said this , is not an application
 7 that seeks to divert the attention away from the core
 8 focus and on to individual experiences of survivors ,
 9 save where it is necessary to do so, but it 's an
 10 application that focuses on the central issues because
 11 in assisting the families to get the answers they
 12 deserve, so too will the survivor applicants .

13 We say that allowing them to be represented as core
 14 participants is the most reliable and indeed the most
 15 cost- effective way of ensuring that this inquiry hears
 16 the evidence that is available and that is admissible
 17 and that is of value. Once again, we rely on the
 18 reality that until this application was made and was
 19 advanced, it seems that aspects, and important aspects,
 20 of your inquiry were likely to be conducted without
 21 adequate consideration of the value that survivors may
 22 bring .

23 I don't, of course, seek to advance criticism
 24 in that regard; it is simply a fact that they have not
 25 been contacted. I have already indicated that that may

1 well be because the information that is held on your
 2 systems is not information that contains all of that
 3 which is of value to the inquiry and allows that
 4 a judgement can be made on the basis of statements.

5 So it is our submission that considering whether
 6 this application and these applicants can assist the
 7 inquiry in fulfilling its aims, the answer is
 8 undoubtedly yes. But the answer also is that they will
 9 do so in a way that is proportionate , is measured and
 10 adds value. I hope that the example that we have given
 11 of just six individuals who can contribute to the
 12 emergency medical response is evidence of that.

13 Do they have a unique perspective? Much is made of
 14 the conclusions of Lady Justice Hallett in the 7/7
 15 inquiry , which of course were bombings on tubes and
 16 London buses. Whilst we don't for a moment, again, seek
 17 to diminish the experiences of those survivors in that
 18 application , this we suggest is considerably different .

19 This was a bomb that went off in a large public
 20 space. It went off at a time when survivors were able
 21 to view the bomber before and view the effect of his
 22 bomb immediately afterwards, and in some cases for hours
 23 afterwards .

24 Their contribution is unique as a result of their
 25 experience and we suggest that their contribution would

1 push consideration of issues of importance to this
 2 inquiry beyond what it seems is being considered at this
 3 point in time, but in a way that adds value to the
 4 purpose of the inquiry .

5 The impact on proceedings. We have addressed in our
 6 written submissions the suggestion that the application ,
 7 if granted, would impact the start of the proceedings .
 8 We maintain that and we give an undertaking on behalf of
 9 the survivor applicants that, if granted, we will be
 10 ready for the start and an application will not be made
 11 on their behalf to delay proceedings.

12 We don't suggest that this application will have no
 13 impact. Clearly , it will . But neither should the
 14 impact in preparation for the start of the inquiry be
 15 overstated. It may lead to additional disclosure . It
 16 may lead to, as I've already identified , additional
 17 witnesses to be interviewed , statements to be taken. It
 18 may lead to consideration of whether additional aspects
 19 of evidence that the survivors can offer would
 20 contribute to individual headings under the scope of the
 21 inquiry . It undoubtedly will lead to a greater degree
 22 of communication and liaison between your team and those
 23 representing the other core participants and the
 24 bereaved families in particular . But it will not lead,
 25 we suggest, to a delay in the start of the inquiry , and

1 to the extent that it adds any time to the duration of
 2 the inquiry , which of course we observe, although it has
 3 a start date does not yet have any established end date,
 4 because nobody knows precisely how long this inquiry
 5 will last -- but to the extent that it adds time through
 6 witnesses being called or questions being posed, it will
 7 also add value. Of course, we also acknowledge that the
 8 extent of witnesses to be called or questions to be
 9 asked will be subject to both your case management
 10 powers and subject to others having asked questions
 11 previously and subject to liaison between the parties .
 12 But our primary submission is that if it does add
 13 time -- and we don't suggest that it won't add any
 14 time -- that time will also add value.

15 To put it in context, we don't suggest for a moment
 16 that this application on behalf of the survivors is
 17 going to add such time that it delays the end of the
 18 inquiry unreasonably. We hope that the assurance that
 19 we have given today, that we don't seek a lengthy and
 20 unwieldy exploration of the experiences of survivors ,
 21 save where it assists you and the families , will
 22 reassure parties to that extent.

23 Sir, I have dealt with, I hope, the impact on
 24 proceedings in terms of the delayed start , in terms of
 25 disclosure and in terms of the protracted hearings .

1 I have addressed in our written submissions the impact
 2 on facilities and concerns that have been raised to date
 3 in that regard and I hope that you'll forgive me by
 4 saying that we rely on counsel to the inquiry's
 5 observations in that regard.

6 So we turn to the question of whether the Article 2
 7 and Article 3 rights of the survivors are engaged to
 8 such an extent that their effective participation in
 9 this inquiry must be achieved. Although we have spent
 10 some time persuading you to exercise your discretion in
 11 favour of the applicants under rule 5, we do maintain
 12 that for significant proportions of the survivors , if
 13 indeed not all of them, certainly a significant
 14 proportion of them, they have a right to participate in
 15 this inquiry on the basis of an arguable breach of their
 16 Article 2 and Article 3 rights .

17 This is set out -- and if I can ask you, sir , to
 18 turn to it, although for present purposes I don't ask
 19 that it's put on screen -- at page 95 of the bundle. At
 20 paragraph 86, and the sub-paragraphs that follow , if
 21 I can address it in these terms.

22 There is of course an agreement that Article 2 is
 23 engaged. There appears to be at sub-paragraph (b) an
 24 agreement that the arguable breach of Article 2 and
 25 Article 3 in terms of the rights of some survivors is

1 likely to arise because of the potentially fatal
 2 injuries that resulted .

3 I think we ought to remember, and I'm not going to
 4 draw your attention to it , sir , in great detail because
 5 it's undoubtedly distressing , but you will have read the
 6 survivors ' summaries and undoubtedly will be well aware
 7 of the nature and gravity of some of the injuries
 8 sustained by some of those who I represent , and indeed
 9 the overall gravity of the injuries as a result of the
 10 way in which this explosive device was constructed .

11 It is continued at paragraph (c) and we agree that
 12 where there is an arguable breach of Article 2 in
 13 a fatal case, the procedural obligation arises ,
 14 requiring an effective investigation into the deaths in
 15 question, and we agree with the quote set out in the
 16 well-known case of Amin.

17 Over the page, it is in cases where there is
 18 a fatality , it has been suggested in both common law and
 19 Article 2 and Article 3 cases that the investigation
 20 should contribute to the victim's sense of catharsis and
 21 resolution and restoring human dignity, and an Article 2
 22 investigation must meet a number of minimum requirements
 23 including the effective participation of the victims :

24 " Effective participation may include being provided
 25 with disclosure , funded representation , asking questions

1 or suggesting lines of questioning ."

2 And of course, that relates to cases in which there
 3 has been fatality .

4 We go on at sub-paragraph (d) to refer to non-fatal
 5 cases, where the investigative obligation may arise but
 6 there may be a more flexible and less stringent approach
 7 than in fatal cases. We ask you, sir , to acknowledge
 8 that for a great number of the survivors , the difference
 9 between fatalities and very serious life -changing
 10 injuries , the sorts of injuries that still persist today
 11 and will persist forever , is very narrow indeed .

12 Of course, death adds a further dimension of
 13 gravity , but so too does the experience of the survivors
 14 or some of them in these circumstances .

15 We ask you to bear this mind, and it's at
 16 paragraph 19 of our submissions, and I don't ask you to
 17 turn to it for the moment, that when drawing your
 18 attention to the case of R (JL) v Secretary of State for
 19 Justice, a case that is referred to in your counsel's
 20 submissions, that involved a relatively straightforward ,
 21 if I may put it in those terms, near miss through an
 22 attempted suicide in prison . Lord Phillips observed
 23 that:

24 "The investigation into the case of J, which
 25 followed a decision of the Court of Appeal, was

1 conducted by Mr Stephen Shaw of the Prisons and
2 Probation Ombudsman of England and Wales, and he refers
3 to a report published in May of this year, which
4 including the following recommendation:

5 "I recommend that the Prison Service requires all
6 prisons to carry out investigations into attempted
7 suicides, incidents of serious self-harm and other near
8 deaths. These should include [and I emphasise] an
9 independent element and engage the person who has been
10 harmed and/or their family."

11 And Lord Phillips commended:

12 "This recommendation applies to more than mere
13 suicides resulting in serious injury and probably to
14 circumstances that would not engaged Article 2, but
15 I consider it makes good sense nonetheless."

16 We observe, sir, that it makes more than good sense.
17 It must be best practice that where such serious
18 injuries occur and indeed where members of the public
19 are put at some considerable risk attending a concert of
20 this nature, that the engagement of those who survive is
21 as meaningful as it possibly can be.

22 By that, I suggest that their engagement must be on
23 a par with that as envisaged as paragraph (d) in terms
24 of fatalities.

25 As to sub-paragraph (e) and the Roman numerals that

1 follow, we make the following observations. It is
2 suggested because the injuries that were sustained by
3 the survivors were caused by a private individual and
4 not a state agent, that that is a relevant factor to be
5 considered, and in assessing the gravity of the
6 circumstances in which arguable breaches of Article 2
7 and 3 occurred, that reduces the severity.

8 We respectfully disagree. In the particular
9 circumstances of this case and the acute concerns on the
10 part of all those affected, and indeed the public, this
11 was preventable, and the acknowledgement by you that
12 Article 2 is engaged and therefore the state had
13 potential responsibilities and responsibilities that
14 were potentially breached to protect life or to minimise
15 all risk to life, that factor, we suggest, does not
16 diminish the assessment that must be made.

17 As to the greater degree of procedural duties that
18 are met in non-fatal cases, we've already indicated the
19 degree of injury and ongoing injury to the survivors.
20 We acknowledge, as set out in (ii), that this is a broad
21 inquiry, that it is chaired by an experienced chairman,
22 that there are numerous teams, the terms of reference
23 are thorough and exacting and that the bereaved families
24 are participating to the extent that they can
25 legitimately expect to do so.

1 But we say this: the duty towards the survivors
2 cannot be discharged by ensuring the participation of
3 the bereaved, no matter how full that participation is.
4 The survivors, we suggest, given the nature of this
5 attack, have a right to effectively participate, and
6 that effective participation must mean, we suggest,
7 representation at the inquiry.

8 In that regard, we deal with (iii) because it is
9 again suggested that the ability of the survivors to
10 engage or contribute to and participate in the inquiry
11 might be facilitated, although they're not recognised as
12 core participants -- and again we have observed that
13 that has not happened to date and that their ability or
14 availability to participate as witnesses has not been
15 accessed.

16 We suggest that the survivors, and in particular the
17 group of survivors who we represent, given their unique
18 features, their physical and indeed their mental
19 injuries, are entitled to assistance to participate in
20 this process.

21 The fact that an inquiry is ongoing, that is broad
22 and all-encompassing, but continues absent effective
23 participation of the survivors would be, we suggest, an
24 affront to the confidence of the wider public, and it is
25 no solace or indeed no reassurance to you that there

1 have been other investigative measures, and those
2 investigative measures are listed at (iv).

3 None of those investigative measures allowed for the
4 effective participation of the survivors. The
5 Kerslake Report focused, and indeed it's made clear in
6 the terms of reference on that, on the engagement of the
7 bereaved, not on the engagement of survivors. Those
8 survivors who were able to participate did so.

9 I acknowledge, sir, that in the summaries, assisted by
10 your team, only six of the survivors appear to have
11 accessed the Kerslake Review by providing NSPCC
12 accounts. It may be that there are more in the
13 disclosure, but only six are referred to within that.

14 I would ask you to resolve that not by concluding
15 that the survivors had failed to participate when there
16 was an opportunity to do so, but to acknowledge that the
17 Kerslake Report was focused on a particular aspect of
18 this inquiry, focused on the engagement of the bereaved
19 and the emergency medical response, and did not allow
20 for any meaningful participation, much less oral
21 evidence, by the survivors.

22 We also, in terms of the other inquiries -- the
23 criminal investigation, the criminal proceedings -- you
24 know, sir, that many of the survivors followed the
25 criminal proceedings, but those criminal proceedings, we

1 suggest, were inadequate to discharge an Article 2 or
2 Article 3 obligation , as were the other reports and
3 inquiries which were in large part impenetrable to the
4 survivors , much less proceedings that allowed their
5 effective participation .

6 As to (v) and (vi), I addressed at the outset of my
7 submissions to you the survivors ' involvement in
8 previous proceedings and the fact that their silence
9 should not be viewed as being disengaged or having
10 insufficient interest and so I would ask you to resolve
11 both of those in their favour.

12 Overall, when considering this aspect of our
13 application , I'd ask you to conclude that our Article 2
14 rights and Article 3 rights of survivors are engaged,
15 and in order to discharge them, there is a need for an
16 inquiry , your inquiry , to proceed with the participation
17 of survivors .

18 I make clear, as I have already done, that that does
19 not mean that the inquiry should focus on individual
20 wounds sustained, individual medical experiences . The
21 survivors know those already, they have answers to those
22 questions already . The inquiry , in which they must be
23 able to participate , is the one that will seek to answer
24 the questions about the background, the preventability ,
25 the security , the readiness of state agencies to respond

1 to critical incidents , and the adequacy of that
2 response, including lessons learned and good practice .

3 As I've already said, it would be, we suggest, both
4 in breach of their Article 2 and Article 3 rights and
5 indeed an affront to public confidence in this inquiry
6 that it would continue absent the participation of the
7 survivors .

8 The fact that the inquiry quite rightly places focus
9 on the deceased families , quite rightly seeks to fulfil
10 the inquest function in answering those core questions
11 does not mean that there is not also room for the
12 survivors .

13 Sir, I'll address very briefly the issue of
14 independent or separate legal representation , and I make
15 clear that if this application is granted we would be
16 asking you to acknowledge that the survivor applicants
17 are entitled to separate independent representation and
18 should not for the reasons that we have outlined in our
19 written submissions be invited to share representation
20 with the bereaved families , not least because that
21 invitation might well accentuate the concerns that the
22 bereaved families have raised in relation to diluting
23 the focus on them, but also because the survivor
24 applicants and the issues that they can contribute do
25 merit individual and specialist consideration so that

1 you are best assisted , we suggest, in identifying that
2 material that may come within the scope and be heard by
3 the inquiry .

4 So in conclusion we say this . Firstly , that the
5 survivors have demonstrated a sufficient interest .
6 Secondly, that those aspects of your discretion that
7 have been brought to your attention ought to be
8 exercised in favour of granting this application . But
9 in any event we suggest that the survivors ' Article 2
10 and Article 3 rights are engaged such that they have
11 a right to effective participation in this ongoing
12 inquiry .

13 Having made those submissions, we once again assure
14 the inquiry that the participation of the survivors will
15 be constructive , will be sensible , will be
16 proportionate , will be within the terms of reference ,
17 and will be of added value to the bereaved families and
18 to the wider public confidence in the recommendations
19 that you may have to make.

20 SIR JOHN SAUNDERS: Thank you very much, Ms Campbell. I'm
21 very grateful . You've in fact dealt with any of the
22 issues that I wanted to ask, so I think we can now move
23 on, so thank you very much for your submissions.

24 Mr Cooper, you're next. I would propose to carry on
25 if that's acceptable to everybody, maybe until 1.30, and

1 have a quarter of an hour break at 1.30 just to give the
2 stenographer a break, if nothing else , and perhaps
3 everybody else as well . So if that's acceptable to
4 everybody, rather than having a long lunch break, if
5 that's all right , we'll have another break for
6 15 minutes at 1.30.

7 Submissions by MR COOPER

8 MR COOPER: Thank you, sir.

9 Can we first thank Ms Campbell for her careful and
10 sensitive submissions that we have just heard.

11 Of course this is the first time -- certainly in
12 a public hearing before you, sir -- we, as those
13 representing many of the families and the bereaved in
14 this matter, have had an opportunity to express publicly
15 our support, respect and understanding of the trauma
16 that the survivors have gone through and will continue
17 to go through. Nothing that I have to say during the
18 course of these submissions will detract and certainly
19 is not meant to detract from that.

20 Can I just pause for a moment, sir? On my screen
21 I still have you on the screen . Do I have to press
22 something in particular ?

23 SIR JOHN SAUNDERS: I have you on my screen.

24 MR COOPER: As long as I can be seen clearly, I just wanted
25 to clarify that. I'll carry on.

1 So nothing that we submit today is meant to take
 2 away from the respect that those we represent have for
 3 survivors and an understanding and union, in many
 4 respects, that our clients have with them. You have
 5 seen our written submissions, sir, and in many respects
 6 we're not going to repeat what we've put in writing
 7 within those submissions and adopt them for the purposes
 8 of today. We'll simply highlight, shortly I hope, the
 9 salient points that emanate from those submissions and
 10 particularly try to respond to some of the submissions
 11 made by Ms Campbell during the course of her arguments.

12 Of course, as has been noted by all who have spoken
 13 so far and no doubt will be reflected in the submissions
 14 to come, central to our submissions is the importance
 15 that the bereaved remain central to the process that
 16 will ensue, we really do hope, in September given all
 17 the uncertainties that have caused the delay so far.

18 The central position of the bereaved is paramount in
 19 our submission to the ongoing development of this
 20 hearing.

21 Of course, one of the important aspects of that
 22 centrality are the pen portraits. As we have noted
 23 again in our written submissions, a significant amount
 24 of work has gone into the preparation and continues to
 25 go into the preparation of those pen portraits, either

1 presented in writing, orally by video, or a mixture of
 2 that. And again, as far as the start of the hearing is
 3 concerned, again one hopes in September, a significant
 4 portion of the early couple of weeks of the hearing will
 5 encompass that presentation.

6 We are concerned and express our concern in our
 7 opposition to my learned friend's application that that
 8 centrality of the bereaved in the process potentially,
 9 and a real potential, could be undermined.

10 We emphasise here again for those hearing these
 11 submissions that that's not intended to suggest that the
 12 presentation of the survivors' case will be of any
 13 intention to undermine or dilute the process undertaken
 14 for the bereaved. We emphasise our submissions are
 15 based on the reality that will occur or the potential
 16 reality that will occur with the undermining of the
 17 bereaved's central position in the hearing of this
 18 matter.

19 Another aspect, sir, as you'll have seen from our
 20 written submissions, involves what we've referred to,
 21 perhaps a little inelegantly, as the floodgate argument.
 22 We are reassured to some degree that the submissions
 23 made by Ms Campbell limit, so far she's aware, those
 24 which she represents or a team duly appointed would
 25 represent to about 50 or so survivors.

1 But the reality is, and one of our significant
 2 concerns here is, that if you do seek to grant core
 3 participation status to that number, that's not
 4 necessarily going to rule out any future applications
 5 made by others who may feel that they fit within the
 6 category that you, sir, have acquiesced to so far as
 7 Ms Campbell's submissions are concerned.

8 As we know from the disclosed material so far, the
 9 figures are in that respect quite startling. There were
 10 21,000 attendees at the concert on 22 May 2017. From
 11 the disclosure we've already had and referred to in our
 12 document to DS Costello, who provided that disclosure,
 13 the material that we've received shows that 300
 14 people -- more than 300 people in fact -- were
 15 physically injured in the bombing, with 202 graded as
 16 either very serious, serious, or otherwise requiring
 17 hospital treatment. More than 600, according to the
 18 disclosed material we have at the moment, have reported
 19 serious psychological impact.

20 This is effectively the problem that we're concerned
 21 about on the floodgate argument. We're concerned,
 22 obviously, about the number of survivors that may be
 23 granted status, we go back to our centrality argument,
 24 but we're also concerned with the tragic pool of
 25 individuals -- and we emphasise the tragic pool of

1 individuals -- who might similarly make applications
 2 based on or encouraged by any ruling that may ensue from
 3 the hearing that we're undertaking at the moment. That
 4 significant pool, in our submission, supports, we would
 5 say, the floodgate concern.

6 If we may respectfully put it this way, sir. Once
 7 you have laid a benchmark, as it were, if there is
 8 a benchmark to be laid as far as significant interest is
 9 concerned (inaudible: distorted) or an indication of how
 10 your discretion runs, once a benchmark is provided as to
 11 an indication as to how your discretion might run
 12 in relation to these applicants, we would submit there's
 13 nothing, quite properly, we might add, that could stop,
 14 again, a floodgate of people applying to take part
 15 centrally as core participants within this hearing,
 16 which could be and would be, we submit, to the detriment
 17 of the centrality of the bereaved being at the centre of
 18 the process.

19 There are a number of matters we would like to raise
 20 in relation to observations made by Ms Campbell during
 21 her submissions. I've been able, obviously, through the
 22 ability to communicate electronically with my
 23 instructing solicitor, and indeed my instructing
 24 solicitor during the course of this morning's hearing
 25 has been receiving instructions directly from our lay

1 clients as a result of some of the things that they've
2 heard during the course of this hearing.

3 Those we represent are concerned as to what they've
4 heard from Ms Campbell on a number of points and I'm
5 instructed and willingly do make this clear to this
6 hearing what their concerns are.

7 As you know, sir, we represent 12 bereaved,
8 11 families, as far as this atrocity is concerned.
9 We have received instructions from nine of our 11
10 families to categorically oppose this application. The
11 other two individuals, one is very vulnerable and the
12 other one is abroad, so we have nothing to indicate at
13 all that those other two individuals will not support
14 the nine of those we represent who have categorically
15 said and instructed us to oppose this application, with
16 the greatest of respect and understanding to the
17 survivors, but to oppose.

18 Therefore I have been receiving a number of
19 instructions this morning, quite concerned instructions,
20 when they hear from Ms Campbell that in some way, some
21 families have acquiesced to this application -- it's
22 a matter for you, sir, of course -- or given their
23 support to this application.

24 I can inform this hearing that as far as I'm
25 instructed, nine of our families are categorically

1 opposed to it and the other two we cannot contact
2 presently, one is vulnerable and one is overseas.

3 I'm also instructed and received instructions during
4 the course of this morning that for those of the
5 families and bereaved that we represent -- we are not
6 saying the survivors weren't at the Old Bailey during
7 the course of the trial, but certainly were not
8 approached at all by any survivors at the Old Bailey, so
9 much so that those we representative could indicate
10 their support for this application.

11 It may well be that support for this application by
12 the bereaved was by the bereaved represented by my
13 learned friends, but I'm under -- how shall I put it --
14 very strong instructions to make it clear to you, sir,
15 that those we represent, in the manner I have
16 articulated it, oppose this application for the reasons
17 that we have laid out.

18 The submissions made by Ms Campbell, as far as an
19 analogy to Grenfell is concerned, can I briefly deal
20 with that if I may. And I deal with this on
21 instructions from those instructing me who are working
22 in the Grenfell hearing, as no doubt are many who appear
23 before you, sir.

24 I'm instructed to bring to your attention, sir, that
25 the terms of reference of the Grenfell hearing are

1 significantly wider than they are as far as this hearing
2 is concerned, and that may or may not -- others may have
3 submissions -- indicate why perhaps there's more
4 accessibility, if one can put it that way, to survivors.
5 Therefore any analogy that my learned friend seeks to
6 make concerning survivors' access to Grenfell compared
7 to survivors' access to your inquiry, we respectfully
8 submit is unhelpful.

9 All terms of reference all turn upon the individual
10 approach of the hearing and whatever your views, sir, on
11 my learned friend's application, we would submit that
12 the Grenfell analogy is not helpful.

13 Can I nonetheless reassure my learned friend, having
14 heard all of what she's had to say today, on certain
15 matters which may or may not reassure her. Many of the
16 issues my learned friend has raised, perfectly properly,
17 on behalf of the survivors are very, very much on our
18 minds as well as far as those that represent the
19 12 bereaved, as far as we are concerned, and I'm sure
20 will be on the minds of others that go after me.

21 We are very concerned and very engaged, as your team
22 know, for instance with the quality of medical care and
23 attention received by individuals who were alive at the
24 time and then subsequently died at the arena.

25 We are significantly engaged and are applying

1 ourselves, as your team know, in relation to certain of
2 those we represent, particularly about the standard of
3 care and medical attention that that individual and
4 maybe other individuals received at the scene, which
5 includes triage, which includes the swiftness of
6 attention, and which also includes the adequacy of
7 medical attention.

8 We, like others in this hearing, and the top and
9 bottom of it is, you, sir, at the top of that pile, are
10 concerned with all the aspects that my learned friend
11 Ms Campbell raises including security, including
12 policing, including concerns generally about
13 coordination of all emergency services at the time that
14 this atrocity was developing.

15 It is important to stress, if only for those
16 survivors who quite rightly are interested in a proper
17 and thorough inquiry into what happened on 22 May, for
18 them to understand that though very tragically indeed
19 those we represent, the bereaved that we represent, lost
20 loved ones, many of the issues, if not all of the issues
21 that my learned friend Ms Campbell has perfectly and
22 properly brought to the attention of this inquiry
23 concerning the concerns of survivors are very much
24 at the top of the agenda for those we represent, who
25 sadly died.

1 I hope in some form, however little, that may be of
2 reassurance, both to my learned friend and indeed to
3 those that she represents, that these matters are very,
4 very much within our focus.

5 Can I raise one other matter, and this is really of
6 support to my learned friend Ms Campbell more than
7 anything else. We certainly, on my instructions, do not
8 associate with any submissions about the lack of
9 engagement of the survivors. Certainly one of my
10 clients, who is the engine room of Martyn's Law, if
11 I can put it that way, has expressed and continues to
12 express immense gratitude to everyone involved with that
13 campaign, which includes significantly the survivors.

14 I'm not instructed and neither do I wish to make any
15 criticism about the time that the survivors chose or
16 chose not, I put it as neutrally as I can, to engage in
17 this process. We, certainly on behalf of those who
18 I represent, commend the survivors for everything that
19 they have done, for the support they've given to those
20 we represent and for their assiduous engagement in this
21 matter. There may be reasons why others make
22 submissions concerning the time or the quality of
23 engagement. We make no such submissions and indeed
24 stand firmly with the survivors as far as that is
25 concerned.

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1 Sir, in many respects, that's all, really, we wish
2 to submit at this stage. We simply submit this on our
3 last observation within our written submissions
4 concerning readiness. We are grateful for the
5 undertaking that my learned friend Ms Campbell has given
6 as far as being hearing-ready. All we can submit at
7 this stage -- and we understand that my learned friend
8 can be held to it if appropriate -- given what we have
9 seen of the disclosure to date and what we anticipate
10 disclosure will be as we go forward is that that is
11 a very bold submission and that is a very bold
12 undertaking, but I take it from my learned friend --
13 I make that submission on the basis of material that
14 we have seen and the material they might have to see
15 should they be granted status.

16 Sir, I hope that's of assistance in terms of our
17 position here. It's very important on behalf of those
18 we represent that we do not want to be seen by the
19 survivors, who have been immensely supportive of us and
20 continue to be supportive of us, and we of them, that
21 we're making any negative submissions in the sense that
22 we are opposing this application. It would be wrong and
23 terribly unfortunate if it was taken that way by anyone.
24 We simply make these submissions as far as the
25 perspective of those we represent is concerned and

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1 fundamentally on the centrality of their position in
2 this hearing.

Those are our submissions.

3
4 SIR JOHN SAUNDERS: Thank you very much, Mr Cooper, I'm
5 grateful.

6 Mr Weatherby.

7 Submissions by MR WEATHERBY

8 MR WEATHERBY: Yes, thank you. I will be brief.

9 Our overall position has been and remains one of
10 neutrality. Following Ms Campbell's helpful and clear
11 submissions, I want to make clear why we are in
12 a formally neutral position. That is primarily because
13 there are differing views within the seven bereaved
14 families that we represent. So there are mixed views
15 and I want to make that clearly clear.

16 Some of the families that I represent are supportive
17 of the survivors' application, some oppose it, and some
18 are neutral. It isn't a numbers game. In fact, more of
19 my families support the application than oppose it. All
20 of them take their views for entirely legitimate
21 reasons, which reflect the complexity of the
22 applications that are before you today.

23 Some of my bereaved families are indeed themselves
24 survivors and suffered terrible life-changing injuries
25 themselves. All of the families I represent are united

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1 in underlining, as others have already, that many
2 survived the outrage of the bombing only with severe and
3 life-changing injuries, and many, many survivors have
4 been deeply traumatised, and nothing that we say is
5 meant to diminish those facts at all.

6 We certainly agree that they have a substantial, not
7 a merely significant, interest such as to satisfy
8 section 5.2(b).

9 We have raised two concerns -- and that's all that
10 they are: firstly, that we do not want the centrality of
11 the bereaved in this process to be diminished and,
12 secondly, the families do not want further delay.

13 With the COVID-19 postponement, the delay concerns
14 in my submission rather fall away and we accept the
15 undertakings of Ms Campbell and the assertions of your
16 team that the inevitable delay caused by the virus would
17 take away the concerns of the involvement of survivors.

18 That leaves us essentially with the dilution point
19 and, as I say, we do not suggest that that on its own is
20 a determinative point.

21 Given the mixed views of our families, as I say --
22 I am being careful and neutral about how I put them --
23 I do want to make some very short submissions.

24 Firstly, we do not believe it is a relevant point
25 in the exercise of your discretion that the survivors

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1 did not apply to be interested persons in the inquest
 2 process on the particular facts of this matter. In the
 3 circumstances of this case, where the survivors have
 4 such an obvious and strong interest, their application
 5 should not be defeated even in part because for whatever
 6 reason it's been delayed. Ms Campbell has addressed
 7 that eloquently already and I intend to say nothing
 8 further about that.

9 Secondly, although we understand the point that the
 10 terms of reference properly include detailed
 11 consideration of what happened to each of the deceased
 12 in parts 6 and 7 of the terms of reference, and whereas
 13 it would be impossible to take the same approach with
 14 each of the injured survivors, we very much do take the
 15 view that what generally happened with those that
 16 survived is likely to be important in consideration of
 17 the emergency response, its appropriateness, its
 18 efficacy.

19 Whether that can be dealt with by survivors as
 20 witnesses rather than CPs is for the decision of the
 21 inquiry, bearing in mind the submissions made by
 22 Ms Campbell this morning and in writing. But we do flag
 23 up that consideration of the emergency response will
 24 have to go further than the experience of the 22 in any
 25 event.

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1 So to reiterate: insofar as the CTI submission
 2 downplays consideration of the emergency response and
 3 pre-hospital treatment, as it relates to survivors, then
 4 we disagree with that submission. The efficacy of the
 5 emergency response cannot be judged by the experience of
 6 the deceased only. There is no conflict between terms
 7 of reference which require close consideration of what
 8 happened to each deceased and generally what happened to
 9 others, including some individuals, in order to fully
 10 consider the efficacy of the emergency response. That
 11 comes directly from part 5 of the terms of reference and
 12 also the function of the inquiry in respect of
 13 preventing future deaths. That will be essential
 14 whatever the outcome of this application.

15 Finally, just because Grenfell has been mentioned.
 16 As I understood the earlier submissions, and of course
 17 Ms Campbell will come back and speak for herself, but as
 18 I understood them, the comment made about Grenfell was
 19 with respect to whether the number of survivors would
 20 skew the inquiry or make it unmanageable.

21 In fact, although the terms of reference, as indeed
 22 in all inquiries, are tailored and different, in fact
 23 there were a large number of survivors, as has already
 24 been raised, that were represented with the bereaved and
 25 that did not lead, in certainly phase 1 of the inquiry,

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1 to any great difficulties in terms of the administration
 2 of that inquiry.

3 Unless I can assist further, those are our
 4 submissions.
 5 SIR JOHN SAUNDERS: I'm very grateful. Thank you very much,
 6 Mr Weatherby, for those submissions. I think it's
 7 appropriate now to take our break. As we're slightly
 8 early, we'll break until 1.45 if that's acceptable.
 9 We'll then hear from Mr Atkinson and it may be that
 10 during this time anyone on the phone who wishes to make
 11 submissions on the phone can notify the secretary to the
 12 inquiry or contact someone to say they wish to say
 13 something, and then we'll make sure that's done. So
 14 we'll cut the live link now and I'll invite that
 15 everyone is muted. If we could all be back by 1.45, I'd
 16 be grateful. Thank you all very much.

17 (1.28 pm)

(A short break)

19 (1.45 pm)

20 SIR JOHN SAUNDERS: Mr Atkinson.

Submissions by MR ATKINSON

21 MR ATKINSON: Sir, like Mr Cooper and Mr Weatherby, before
 22 me, and on behalf of the families of the six of those
 23 who lost their lives at the arena that I represent,
 24 I want to emphasise that they are acutely aware of the
 25

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1 lasting impact that that attack on 22 May had on all
 2 those who were affected by it, including those now
 3 represented by Ms Campbell.

4 It is, however, our core submission that in
 5 accordance with the terms of reference of this inquiry,
 6 the focus of this inquiry is on and should remain on
 7 those who lost their lives and that the vitally
 8 important role that the survivors have in this inquiry
 9 and the effective participation that they will have is
 10 as witnesses to assist this inquiry meeting its terms of
 11 reference rather than as core participants to the
 12 inquiry itself.

13 Our submissions in relation to that, which are at
 14 tab 6, are, I know, well in mind, sir, and so I'm
 15 conscious that it will not help for me to repeat what
 16 I've set out there in writing or to repeat indeed that
 17 which others have already said. But in our written
 18 submissions we did raise a number of concerns that
 19 perhaps I ought to address shortly before returning to
 20 that core submission again -- and I promise it will be
 21 shortly.

22 It was we in our submissions that raised the
 23 possibility of there being a need to undertake
 24 a case-by-case analysis as to whether there was, in the
 25 case of a particular applicant, a significant interest

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1 that would meet the test in rule 5. That was at a time
2 before we had the very helpful summaries that we now
3 have and which have assisted in that.

4 It is clear that such a case-by-case analysis would
5 be necessary if, in particular, a focus was needed on
6 Articles 2 and 3 in determining this application in the
7 way that perhaps Ms Campbell's application might
8 suggest.

9 But we agree that any such analysis would be
10 difficult, it would be invidious, and we agree with
11 counsel to the inquiry that it is not ultimately
12 necessary to undertake that and we don't pursue our
13 suggestion in our written submissions that that is the
14 analysis that you, sir, need now to undertake.

15 We secondly raised in our written submissions
16 a number of concerns relating to delay and there are
17 a number of facets to that.

18 First, that the application itself was late in being
19 made. That is capable of indicating a lack of interest
20 in the terms identified by Mr Greaney in the
21 proceedings, but we've heard all that's been said by
22 Ms Campbell on that point and we don't seek to take that
23 point any further. We understand the position as she
24 has so eloquently set it out.

25 Secondly, we were in that regard concerned as to

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1 delay in the start date of the inquiry and the start
2 time of the inquiry. We are reassured about that. We
3 share Mr Cooper's hesitation in accepting the assurance
4 we've been given by Ms Campbell, but of course, like
5 him, we do accept that there is a lot that would have to
6 be done were the survivors to be granted CP status in
7 a very little time. But if they give us that assurance,
8 of course we don't seek to go behind that.

9 What we do have a concern about in that regard, and
10 we refer to in our written submissions, is
11 a proliferation of legal representation, by which we did
12 not mean that those who Ms Campbell represented would be
13 engaging in a proliferation of legal representation, but
14 that there would be others who would follow the example
15 of Ms Campbell and those that she represents, and that
16 there would be by that means the proliferation of
17 representation that my learned friend Mr Cooper has also
18 referred to in his floodgates point earlier. That does,
19 I'm afraid, remain a concern for those who I represent
20 that could lead to a delay to these proceedings in
21 starting.

22 Our greater concern, though, in relation to delay is
23 in relation to delay during the evidential proceedings
24 themselves. If the focus of those proceedings remains
25 on the terms of reference of the inquiry, then we agree

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1 that you, sir, will be able to manage any such delay by
2 ensuring that there is no repetition and so on. If,
3 however, there is the kind of diversion into sub-issues
4 that my learned friend Ms Campbell has identified in her
5 submissions -- the six examples that she gave of
6 potential witnesses, survivors, the triage in relation
7 to some of them, the treatment in relation to others --
8 if there is diversion into those areas that are not
9 within the terms of reference then there will be delay.

10 We are concerned also that -- Ms Campbell suggests
11 there would not be an unreasonable delay to the ending
12 of the inquiry. There should be no delay to the ending
13 of the inquiry in accordance with its terms of
14 reference.

15 The third area that we raised in our written
16 submissions as an area of concern, before I turn to our
17 core submission, was in relation to the facilities for
18 the inquiry. There were, in the experience of those
19 amongst whom I represent, who were present during the
20 proceedings at the Central Criminal Court, difficulties.
21 There was discomfort in relation to the arrangements for
22 them as opposed to those for survivors, which lead them
23 to have very real concerns about how facilities would be
24 managed at the inquiry if the survivors were given CP
25 status.

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1 We are comforted by the assurances of counsel to the
2 inquiry in relation to that, but it is an important
3 concern for those who I represent and so I highlight it
4 again.

5 Turning then, if I may, finally to the focus of our
6 concerns and the reason why none of the six families
7 that I represent feel able to support this application
8 made by Ms Campbell. It is clear, we submit, that the
9 consequence of the application is a real risk of
10 a dilution of the focus of this inquiry on those who
11 ought to be at its centre, namely the families of those
12 who lost their lives at the arena.

13 In her written submissions, Ms Campbell at
14 paragraph 20 makes the point that the fact that people
15 died should not undermine the Article 2 and 3 rights of
16 those who survived to have the fullest possible
17 participation in the inquiry. She kindly prefaces those
18 submissions by saying that she means no disrespect to
19 the families of those who lost their lives, but in
20 making that submission I have to say, certainly among
21 those whom I represent, there was a degree of upset at
22 that point having been made, but we submit more
23 importantly it misses two important points.

24 Firstly, if no one had died, the extent of
25 participation of survivors in an investigation into such

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1 an incident would not have been the same as the degree
2 of close participation that is necessarily the
3 entitlement of the families of those who died when there
4 has been a loss of life in an incident and an
5 investigation is then undertaken in relation to it .

6 Putting that the other way round, the fact that
7 there are those who have died and the fact there are
8 those who survived does not mean that those who survived
9 necessarily are entitled to the same degree of
10 participation in the investigation as those whose
11 Article 2 rights are directly affected by the fact that
12 they are the families of those who lost their lives .

13 Secondly, it is the inevitable , unavoidable and
14 central facet of this incident that 22 people lost their
15 lives and that this inquiry flows from the fact that
16 there was to be 22 inquests that were converted, as you
17 know, sir , into this inquiry , following your letter --
18 that is at tab 19 -- that itself made clear that it was
19 the deaths of those 22 that would remain the central
20 focus .

21 That is entirely reflected by the terms of reference
22 of the inquiry . It is the entire basis for the purpose
23 of the inquiry and that is not, to use Ms Campbell's
24 words, inexplicably restrictive . That is the clear ,
25 definite and justified purpose for this inquiry and

1 should remain so .

2 We would suggest that Ms Campbell's written
3 submissions betray an underlying flaw in her approach
4 when she talks at paragraph 18 of this being an
5 investigation into the circumstances in which the
6 applicants were physically or mentally injured . It is
7 not. Rather, it is an investigation into the
8 circumstances of the death of those 22. No application
9 is made to amend the terms of reference , although at
10 points in Ms Campbell's submissions it might have been
11 thought that she was seeking to do so by reference to,
12 for example, her six examples, which mainly focused on
13 the treatment and care of the living rather than the
14 circumstances of the deaths .

15 We agree with the analysis of counsel to the inquiry
16 that the survivors have an important role in relation to
17 assessing those aspects of the terms of reference that
18 deal with the preventability of what happened, the
19 adequacy of the emergency response -- and in this
20 context we agree with Mr Weatherby that the emergency
21 response in this context goes well beyond just
22 consideration of the treatment of those who died but to
23 the emergency response more generally , and therefore
24 clearly involves that of the survivors -- and also
25 in relation to prevention of such incidents in the

1 future .

2 In all of those respects , we submit that there is
3 a clear overlap between the concerns of those who
4 Ms Campbell represents and those who I, Mr Cooper and
5 Mr Weatherby represent, on whose behalves we will
6 rigorously test the evidence in all of these areas,
7 we will rigorously ensure that answers are provided to
8 the questions which we understand entirely that
9 survivors share with those who we represent .

10 In those proceedings, they will , again to use the
11 words of Ms Campbell, have a voice. Their voice will be
12 as witnesses because they are, again as Ms Campbell
13 said, the living witnesses to help this inquiry reach
14 its conclusions .

15 It will be for the inquiry , through all those
16 participating in it, to ensure that the evidence that
17 needs to be considered as to its value is considered,
18 but that which is of value needs to be heard and that
19 which is heard will be tested. All of that will be done
20 and, with the greatest of respect, it can be done and
21 will be done without the survivors being afforded core
22 participant statuses because their role in these
23 proceedings remains a central and vital one, to be those
24 living witnesses, in a process where the focus will ,
25 however, remain, as it should, on the families of those

1 who died .

2 Sir, unless I can assist further , those are my
3 submissions .

4 SIR JOHN SAUNDERS: Thank you very much for that, I'm very
5 grateful .

6 Can I now make an enquiry as to whether anyone who
7 is ringing in on the phone wishes to make any
8 observations?

9 MR GREANEY: Sir, I can tell you that no one has made
10 contact with Mr Suter to indicate that he or she wishes
11 to make a submission by telephone .

12 SIR JOHN SAUNDERS: Right. If anyone says anything in the
13 next 10 seconds, I shall assume no one wishes to say
14 anything .

15 MR COOPER: I can see some green telephone symbols coming up
16 on my screen. Does that indicate people are trying to
17 get through?

18 SIR JOHN SAUNDERS: I don't know the answer to that, I'm
19 afraid , but no doubt somebody will know the answer to
20 it .

21 MR DUNLAY: No. I'll mute everybody again now .

22 SIR JOHN SAUNDERS: Thank you, Mr Dunlay, thank you.
23 (Pause)

24 MR GREANEY: Sir, I was unable to hear what you just said ,
25 but my understanding --

1 SIR JOHN SAUNDERS: I invited you to make submissions.
 2 Reply submissions by MR GREANEY
 3 MR GREANEY: Thank you very much.
 4 We have some very short submissions to make in
 5 response principally , if not exclusively , to the
 6 submissions that were made on behalf of the survivors by
 7 Ms Campbell.
 8 Point 1 relates to the reliance placed by the
 9 survivors upon the announcement of this inquiry by the
 10 Secretary of State. The position is , sir , as you well
 11 know, the inquiry was established to be materially
 12 identical to the inquests . That is clear from your
 13 letter to the Secretary of State and is most certainly
 14 clear from the terms of reference .
 15 Therefore, as Mr Atkinson has just made clear, the
 16 inquests and this inquiry have always been focused on
 17 the deaths of the 22 and, moreover, it is clear that
 18 they will now remain focused on those deaths given that
 19 no application has been made to amend or to expand the
 20 terms of reference .
 21 Sir , on this point, could we ask that page 233 of
 22 the bundle is placed on the screen? Just so that
 23 everyone knows to what I'm referring , this is the press
 24 release that contains the announcement of this inquiry
 25 by the Secretary of State.

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1 (Pause)
 2 There we are. It's the third paragraph down, where
 3 you'll see that the press release contains the
 4 announcement states:
 5 "The inquiry to investigate the deaths of [and then
 6 the names of the 22 are given] in the horrific attack at
 7 Manchester Arena on 22 May 2017 ..."
 8 And then this important passage:
 9 "... will have the same scope as the current
 10 inquest."
 11 So it comes to this , sir , that at its height, the
 12 Secretary of State's announcement indicates her hope
 13 that the inquiry will provide answers to the bereaved
 14 and also to others, including the survivors , and we
 15 agree with that. But in our submission, that provides
 16 absolutely no legal support for the survivors ' core
 17 participant application .
 18 The second matter upon which we would like to make
 19 a short submission is the topic of statements from
 20 survivors . The argument that's been developed by
 21 Ms Campbell, as we've understood it , is that points
 22 would have been missed by the inquiry had it not been
 23 for the application for core participant status that has
 24 been made.
 25 We would wish to say emphatically that that is not

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1 so. The position is -- and we don't blame Ms Campbell
 2 for not knowing this -- that the position as a matter of
 3 fact is as follows: that we, that is to say the inquiry
 4 legal team, are in possession of a very large volume of
 5 material that relates to the emergency response,
 6 including expert evidence, closed circuit television
 7 footage, corporate statements, command and control
 8 statements, statements of emergency responders, and also
 9 statements of survivors taken by Greater Manchester
 10 Police, essentially operating in the capacity akin to
 11 that of a coroner's officer . Those statements of
 12 survivors include, if not all , statements of nearly all
 13 of those that Ms Campbell represents.
 14 We, the legal team, have established systems for
 15 dealing with all of that material. It involves
 16 preparing witness lists and evidence summaries. That
 17 work identifies where rule 9 requests need to be made of
 18 existing witnesses or of new witnesses, sometimes
 19 because the CCTV footage reveals an existing witness's
 20 account is incomplete or even incorrect .
 21 All of that was underway long before the application
 22 for CP status was received , so it is not correct that
 23 important aspects of investigation would have been
 24 missed was it not for the recent intervention of
 25 Ms Campbell's team. So the simple point is that that

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1 basis for claiming core participant status simply falls
 2 away on the basis that it is based upon a factual
 3 misunderstanding.
 4 SIR JOHN SAUNDERS: Mr Greaney, just help me, because this
 5 was essential really to the submissions which were being
 6 made. But the point being made was, as I understand it ,
 7 that those who had made statements to Greater Manchester
 8 Police would not have been making statements which
 9 necessarily related to all the matters about which
 10 I would be interested . So it would no doubt deal with
 11 if someone saw Salman Abedi and the events at a time
 12 when the blast took place, but whether it would deal
 13 with security being there, how much security, what they
 14 were doing, whether it would deal with the emergency
 15 response, because the police might not have been
 16 interested in it .
 17 Her point, I think, is: you'd never have picked this
 18 up if it wasn't for us putting it in the analysis that
 19 they have done of what the survivors are saying and you
 20 really need our help in order to make sure you get all
 21 that material , which does relate to the terms of
 22 reference .
 23 MR GREANEY: Sir, there are two points to make in response
 24 to that. First of all , your team, in reviewing the
 25 statements that have been obtained by Greater Manchester

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1 Police, would obviously have had in mind all of the
 2 matters that you are required to investigate as part of
 3 the terms of reference and would have had well in mind
 4 making appropriate rule 9 requests in respect of, for
 5 example, a witness whose statement revealed that they
 6 had been in the City Room for a prolonged period of time
 7 before the bomb went off.

8 The second point to answer your question is that for
 9 all the survivors to provide the kind of information,
 10 which undoubtedly they are able to provide and which
 11 we would welcome, does not require them to have core
 12 participant status. Any survivor is able to get in
 13 touch with the inquiry legal team and to indicate if
 14 they have additional evidence to give on any matter
 15 that is relevant to your investigation.

16 SIR JOHN SAUNDERS: Okay. Does that mean that there will be
 17 active communication with survivors to see whether they
 18 did have material which would help?

19 MR GREANEY: Sir, it seems to us that one of the ways in
 20 which the survivors might participate in your inquiry,
 21 but participate in a way falling short of CP status, is
 22 for there to be communication between the inquiry legal
 23 team and the survivors proactively seeking any
 24 information that they have upon issues such as security.

25 SIR JOHN SAUNDERS: Okay, thank you.

1 MR GREANEY: The point that I was going to say finally on
 2 this second topic on which we rely is that the ability
 3 of survivors to provide evidence is not and has never
 4 been in doubt and will form an important part of the
 5 evidence at the inquiry. But none of that means that
 6 the applicant survivors, or any of them, must be core
 7 participants. It makes them witnesses from whom it may
 8 be appropriate for you to receive evidence and, as
 9 Mr Atkinson has emphasised, they will be important
 10 witnesses because they will be the living witnesses.

11 That really is the essential problem with the
 12 submissions made on behalf of the survivors, that they
 13 do not, we submit, explain -- or at least not
 14 adequately -- how and why the gap between witness status
 15 and core participant status is bridged in their
 16 circumstances.

17 So point 3 relates to our third factor, bearing upon
 18 the exercise of your discretion. Factor 3, to remind
 19 you, is the effect on core participant and wider public
 20 confidence in the inquiry. Ms Campbell suggests that
 21 the public will ask why there is no survivor
 22 participation in your inquiry whereas there is or has
 23 been in other inquiries. We have two short points to
 24 make.

25 First, there will be survivor participation in your

1 inquiry in the way or potential ways that we have
 2 referred to. Survivors will give evidence, they will be
 3 spoken to, and they may be able to participate in the
 4 other ways that we indicated when first we addressed you
 5 this morning.

6 Secondly, the Grenfell inquiry, is not a good
 7 comparator for a number of reasons. One, Grenfell did
 8 not start out life as an inquest, and so it does not
 9 have the strong focus on your inquiry upon the deaths of
 10 the 22. Secondly, its scope, determined by the terms of
 11 reference, is much wider. Thirdly, our understanding
 12 is that there is no separate survivor block, no separate
 13 CP survivor block, in the Grenfell inquiry of the sort
 14 contended for by Ms Campbell. Rather, there are
 15 a number of groups of BSRs, as they are called, bereaved
 16 survivor and residents. So in other words, in a number
 17 of separate groups, such persons are grouped together
 18 and the survivors are not separately represented, as we
 19 understand it.

20 Point 4 -- and there are only five points, sir --
 21 takes us to factor 10, the tenth factor of relevance to
 22 your discretion, namely whether the survivors have shown
 23 a sufficient interest in the workings and conclusions of
 24 the inquiry, so the engagement issue, and here we are
 25 able to offer some comfort at least to Ms Campbell and

1 her submissions.

2 We hope that it was apparent that this was not
 3 a factor that we were submitting should weigh
 4 particularly heavily against the application. But now,
 5 having heard the submissions of Ms Campbell and indeed
 6 Mr Weatherby, and having regard to them as persuasive on
 7 this particular point, our position is that we do not
 8 consider that you should regard this factor as weighing
 9 against the application to any extent. So insofar as
 10 our earlier submissions invited you to attach some
 11 weight to it with that effect, we no longer persist
 12 in that submission. I hope that's clear.

13 SIR JOHN SAUNDERS: Mr Greaney, if it's any consolation to
 14 you, on my initial reading of the papers, it didn't seem
 15 to be the strongest point made by counsel to the
 16 inquiry.

17 MR GREANEY: Well, it was never the strongest point and now
 18 it's no point at all.

19 SIR JOHN SAUNDERS: Thank you.

20 MR GREANEY: Point 5 and the final point upon which we rely
 21 takes us to Article 2 and Article 3. Sir, I don't wish
 22 to say too much about this because the arguments have
 23 been fully explained in the written submissions of CTI
 24 and on behalf of the survivors. One of the submissions
 25 made by Ms Campbell was that the case of JL to which we

1 refer at paragraph 86(c) of our submission, the
2 submission was that that case is authority for the
3 proposition that non-fatal attempted suicides require
4 investigation involving victim participation .

5 We again have a short response. Two points.
6 Point 1: JL is premised on the fact that the victims in
7 such cases, prisoners, are under the control of the
8 state because they are in detention. The particular
9 position of those in detention and the particular
10 protective duties they are owed is stated in JL and many
11 other cases. So the position is that in our submission
12 non-fatal cases in the detention context are likely
13 therefore to fall into a different category from
14 non-fatal cases outside of detention, of which,
15 of course, our case is one.

16 Secondly, it is correct that the state does conduct
17 investigations into non-fatal attempted suicides in that
18 context, but it's important in our submission to
19 identify the way in which it does so. The way it does
20 so is through the Prisons and Probation Ombudsman.
21 There are no inquests, there are no public inquiries .
22 The victims do not have the kind of rights that core
23 participant designation confers .

24 Here, on the survivors' application for CP status,
25 the survivors would receive greater procedural rights

1 than victims in non-fatal detention cases, of which JL
2 was one. It follows from this, in our submission, that
3 what was said in JL therefore does not mean that the
4 survivors' right to effective participation requires
5 core participant designation .

6 Sir, we're grateful for that opportunity. Those are
7 the points upon which we would wish to reply, although
8 as we acknowledged at the outset, the final word should
9 go to Ms Campbell.

10 SIR JOHN SAUNDERS: Thank you.
11 Ms Campbell.

12 Reply submissions by MS CAMPBELL

13 MS CAMPBELL: Thank you, sir. May I deal with a number of
14 discrete points and I can give you the assurance that
15 I won't be long.

16 I want to deal with, if I may, points raised by
17 Mr Cooper and Mr Atkinson in relation to both the
18 proliferation argument, as it's put, and also
19 in relation to support from bereaved families --

20 MR GREANEY: So sorry to interrupt, Ms Campbell, but the
21 reason I am doing so is because I have just received an
22 email which contains some information that you might
23 also wish, I don't know, to make submissions on in your
24 final submissions.

25 Sir, this is an email that comes from the Government

1 Legal Department and therefore it's from those
2 representing HMG, Her Majesty's Government. I'll simply
3 read out the email. It reads:

4 "We don't wish to add anything to our written
5 submissions, but would ask Mr Greaney Queen's Counsel to
6 note in his final address to the chairman that the Home
7 Secretary agrees with CTI's analysis at paragraphs 85
8 and 86, page 95 of the bundle, of their submissions on
9 the question of whether, assuming at least some of the
10 survivors' Article 2 and 3 rights are engaged, the
11 investigative duties which arise require CP
12 designation ."

13 So I'm sorry I didn't deal with that during my
14 submissions, I hadn't seen it -- in fact it may not have
15 been sent -- and I'm sorry again, Ms Campbell, for
16 interrupting .

17 MS CAMPBELL: Thank you.

18 The position appears to be this: that there are
19 families and individual families who oppose this
20 application; there are families, including those
21 represented by Mr Weatherby and those represented by
22 Mr Gozem, who are neutral; and there are families who
23 are supportive of the application, as Mr Weatherby has
24 made clear.

25 Can I say that in relation to the point that

1 Mr Cooper made about attending the Old Bailey, I hope
2 I didn't cause any confusion. I think, as has been made
3 clear, and I hope to give assurances both to the
4 families and to the survivor applicants in this regard,
5 that some survivors certainly did attend the Old Bailey,
6 indeed Mr Atkinson's clients seem to have encountered
7 them there. Others, because of their physical
8 disability, attended the live link in Manchester and met
9 bereaved families there.

10 If I may say, and I think we are all in agreement,
11 that there has been a great deal of cooperation between
12 bereaved families and survivors to date, and a great
13 deal of mutual support and mutual respect. You will
14 of course want to consider the proposition that some of
15 the families oppose the application while nonetheless,
16 certainly in Mr Atkinson's case, as he's made clear,
17 welcoming the participation of the survivors as
18 witnesses .

19 But you will, of course, want to, we suggest, give
20 due consideration to the fact that those families who
21 don't oppose it, and there are those families who
22 positively support it, and indeed there are state
23 agencies who don't oppose it either --

24 SIR JOHN SAUNDERS: Ms Campbell, I hope you don't mind me
25 interrupting you for a moment, but having heard this

1 particular aspect backwards and forwards, as it were,
2 about the families' views, of course they're important,
3 but essential to them are the reasons for their views
4 and that's really what I have to look at, the reasons
5 why those people are opposing it and the reasons the
6 people are supporting it, and that's what I have to
7 balance up. I'm not counting numbers here.

8 MS CAMPBELL: Yes. I'm very grateful for that indication
9 and undoubtedly those who I represent will be reassured
10 by it as well.

11 Addressing some of the reasons for their views,
12 I hope we have addressed practical considerations and
13 I hope we have addressed the issue of delay adequately.
14 I accept that it is a bold statement, but it is
15 nonetheless an undertaking that I give.

16 Addressing if I may the argument as to proliferation
17 or to increase in numbers, can I assure you, sir, that
18 through those who instruct me, and through a network of
19 survivors speaking to each other, as I said in my
20 written submissions, we do not anticipate and have no
21 reason to believe that there will be an increase or
22 a significant increase in numbers of applicants if you
23 were to grant this application.

24 If we had any reason to so believe, we would inform
25 the inquiry candidly. There is no such concern

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1 certainly on our part.
2 SIR JOHN SAUNDERS: Ms Campbell, again, I'm sorry to stop
3 you, but I'm sure all that is right and proliferation is
4 not something which is going to count very highly with
5 me, but what is to stop another firm of solicitors who
6 are interested in this kind of work contacting lists of
7 survivors to suggest they might wish to become core
8 participants and then making a similar application? I'm
9 not suggesting your solicitors have contacted people,
10 I have no idea how these things happen, but what is to
11 stop somebody doing that, another firm of solicitors,
12 and asking those survivors, "Do you want to, would you
13 like to be core participants?" and another application
14 being made, which may rely on the decision in this case?

15 MS CAMPBELL: The truth is that there is nothing to stop it,
16 but I can say this: our information is that
17 111 survivors attended hospital, 63 were deemed to be
18 seriously injured, 28 very seriously, and 62 did not
19 attend hospital at all. So in terms of any assessment
20 of significant risk by virtue of the injuries that were
21 sustained and the nature and the degree of injuries that
22 were sustained, the numbers are relatively limited.

23 The numbers are represented and the individuals are
24 represented in terms of the application that is made and
25 we have no reason to -- either through my instructing

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1 solicitors or indeed through enquiries made in terms of
2 other survivors who we represent, we have no reason to
3 believe that there will be a significant increase in
4 individuals seeking core participant status. Those are
5 the figures in terms of seriousness of injury.

6 In terms of the other aspects of concern that
7 individual families have raised or have been raised on
8 behalf of individual families, we would like to
9 assume -- our position is, if I may put it this way,
10 that we have advanced all that we can to assuage them of
11 their concerns. But you, sir, we would ask, ought to
12 focus as well on the right of the survivor applicants to
13 participate in this inquiry, either through rule 5 or
14 because their Article 2 and Article 3 rights are
15 engaged.

16 We remind you, sir, that we have not, if you like,
17 shied away from any individual analysis of the nature
18 and degree of risk and the nature and degree of impact,
19 but we do represent individuals who have been
20 catastrophically and permanently affected by this blast
21 in a way that affects every waking moment. They, we
22 suggest, have not only shown sufficient interest within
23 the terms of rule 5, but in every aspect of the
24 discretion that you are to exercise. There is good
25 reason to exercise it in their favour because they have

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1 undoubtedly demonstrated that they have not only
2 sufficient interest but a unique perspective, that they
3 have an interest in the matters that are within the
4 terms of reference of the inquiry and, indeed, can
5 contribute to it.

6 If I may, on that point, adopt a position that
7 Mr Weatherby has advanced in terms of -- and I focus for
8 the moment again on the issue of the emergency medical
9 response. It must be right that your inquiry will have
10 to consider the emergency medical response significantly
11 beyond that of the 22 who died, and that therefore
12 incorporates a consideration of the experiences of some
13 of those whom I represent.

14 It is not sufficient, we would say, to say, well,
15 they can be witnesses. I don't seek, and I hope it
16 wasn't interpreted as criticism, to make the point that,
17 well, the survivors have not been contacted to date and
18 therefore no work is ongoing. We fully accept and
19 appreciate the magnitude of this inquiry. We fully
20 accept and appreciate that your team, and indeed all
21 involved, will have had a great deal of information to
22 process from a very wide perspective in terms of CCTV,
23 emergency response witnesses and so on. But the fact
24 does remain that survivors have a significant body of
25 information to contribute and meaningfully contribute

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1 and they have not been contacted directly in order to do
2 so, and the statements that you hold, so far as we have
3 seen, do not enable any analysis of how they can add
4 value to your inquiry.

5 Of course, individuals as, a result of this
6 application, might be contacted by your team and might
7 be asked questions as to their experience, but in order
8 to really get the benefit of their experience from their
9 unique position in that room at that time, sometimes for
10 hours at a time, they ought to be enabled to give their
11 best contribution, and that must be with access to the
12 disclosure, with legal representation to enable them to
13 give that evidence and with legal representation to
14 enable them, to the extent that it is necessary to do
15 so, to properly challenge evidence that, if you like, is
16 presented that does not accord entirely with their own
17 individual experience.

18 It's through that process that the families, the
19 survivors and the wider public can be assured that this
20 inquiry has properly fulfilled its public function in
21 exploring whether lessons will be and need to be learned
22 in future.

23 Sir, if I may just briefly touch on the issue of
24 Grenfell. I didn't advance Grenfell by any means as an
25 inquiry or terms of reference by which we could draw

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1 parallels at all.

2 The point in relation to Grenfell is twofold.
3 Firstly, that is an example of an inquiry where the
4 survivors and bereaved have been represented, have been
5 able to participate and have done so in numbers without
6 the inquiry being unwieldy or unnecessarily so.

7 Secondly, the wider public when considering the
8 public confidence in this inquiry might well ask: well,
9 why is it that those who are now permanently disabled,
10 for example, who will always bear the scars because they
11 decided to take their children to a concert are not able
12 to participate in this inquiry? We bear in mind
13 of course that its primary function is to answer the
14 inquisitorial questions, but are not able to participate
15 in circumstances where individuals who do not even live
16 in the Grenfell Tower were able to participate, who
17 lived in places adjoining it.

18 So it is an example of a inquiry process that allows
19 for the meaningful participation of individuals beyond
20 the bereaved in a way that can contribute to its
21 outcome.

22 Sir, I won't, because you've heard the arguments
23 in relation to Article 2 and Article 3, go into it in
24 any great detail, save to acknowledge, of course, that
25 JL refers to a prison suicide and, as Mr Greaney has

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1 rightly pointed out, and I hope I didn't overstate it,
2 there are procedures in place to allow for those prison
3 suicides or attempted suicides to be properly explored,
4 namely through the Prison Ombudsman.

5 But of course this incident, what happened on
6 22 May 2017 and the impact on survivors, really
7 increases considerably in magnitude and in seriousness,
8 mass injuries amongst those who survived, and while this
9 inquiry is ongoing and while questions are being asked
10 and answers are being sought, we submit that the
11 engagement of the Article 2 and Article 3 rights of
12 those who I represent do, if you like, mandate their
13 participation in this inquiry in a role commensurate
14 with their role and certainly in no way challenging the
15 role of the bereaved families.

16 Sir, I think those are the only submissions that
17 I need to make in response, unless I can assist any
18 further.

19 SIR JOHN SAUNDERS: I'm very grateful. Thank you very much
20 indeed.

21 Can I, without appearing to sound, I hope,
22 patronising, pay tribute to the quality of the
23 submissions that I have heard from all parties today.
24 They have been very measured but they have been very
25 powerfully put forward and very compelling.

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1 Can I also thank those who have enabled us to have
2 this hearing today in this way. It all appears to have
3 gone perfectly smoothly and I hope no one has been cut
4 out who shouldn't have been cut out.

5 The rules providing for this hearing do provide for
6 people to put in written submissions if they have
7 anything they wish to add to what has been said. Can
8 I ask that anything is done by 4 pm on Thursday
9 afternoon. I will, of course, endeavour to give you my
10 ruling as soon as possible. You may well have to wait
11 until after the weekend, I'm afraid, before you get it.
12 It's not necessarily an easy argument and there are
13 a number of aspects to it which need to be dealt with.

14 But unless anyone else has anything to say,
15 thank you all very much and good afternoon.

16 (2.30 pm)

17 (The inquiry adjourned)

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