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Thursday, 16 May 2024 1 2 (11.00 am) 3 LADY THIRLWALL: Good morning. This is a preliminary 4 hearing in the Inquiry into what happened at the 5 Countess of Chester Hospital between 2015 and 2017 and 6 the implications of those events. 6 7 The Inquiry will also investigate further 8 questions of public importance, as set out in the terms 9 of reference. In November 2023, I made a detailed 9 10 opening statement by video which remains on the Inquiry 10 11 website. It can still be viewed and there is a 11 12 transcript of it. I won't repeat what is in it. 12 13 The primary purpose of today's hearing is for 13 14 counsel to the Inquiry, Rachel Langdale, King's Counsel, 14 15 to provide an account of what the Inquiry team has been 15 16 doing since my opening statement in November. 16 17 The secondary purpose is for me to receive 17 18 18 submissions that I've invited on the question of live 19 links and live streaming at the main hearings, which are 19 20 scheduled to start in September and will run at least 20 21 21 until the end of the year. It is at the main hearings 22 22 that we will hear opening speeches and, in due course, 23 all of the evidence. That's not for today. 23 24 Reporting restrictions. I remind you -- all of 24 25 you know this already -- that there are in place several 25 1 today's hearing and I won't be dealing with those 2 2 matters today. Some of them, in fact, have already been 3 dealt with, but the rest will be dealt with in the 4 coming days without the need for oral submissions. 5 5 That's all I want to say by way of introduction. 6 Before I invite Ms Langdale to give her update, I will 6 7 7 just invite everyone just to pause and to be still just 8 for a few moments' reflection to mark our respect for 9 lives lost, injuries sustained and the enduring 10 10 suffering of families, and to remind us all of our 11 purpose in this Inquiry. (Pause) 11 12 12 Thank you. Ms Langdale. 13 MS LANGDALE: My Lady, before I provide an update of the 13 14 work the Inquiry has done, may I introduce those 14 15 advocates that will be speaking and making submissions 15 16 in due course: Mr Peter Skelton, KC, on behalf of 16 17 parents A, B, I, L, M, N and Q; Mr Louis Browne, King's 17 18 Counsel, parents D, J and K; Mr Richard Baker, King's 18 19 Counsel, parents of C, E, F, G, H, O, and P; Mr Andrew 19 20 Kennedy, King's Counsel, representing the Countess of 20

Chester Hospital; the longest to walk, Mr Jude Bunting,

Others advocates in the room not intending to make

King's Counsel, who represents the media.

oral submissions on live streaming are: Ms Kate

Blackwell, KC, representing former executive board

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orders of the Crown Court and an order of the Court of Appeal. The Crown Court orders prohibit the publication of material that may identify certain individuals and the Inquiry is bound by those orders, as I've said before, in the same way as all of you as individuals and organisations are bound. None of us must do anything that breaches them and to do so is a criminal offence. The Court of Appeal order prevents publication of anything to do with the appeal, other than certain specified matters, until the end of the retrial on one count of attempted murder which is listed to start in June of this year. A breach of that order would constitute a contempt of court.

I'm expecting to hear submissions from lawyers representing some of the core participants, including the Families, and from a lawyer representing eight media organisations. I ask for those who wish to make oral submissions on the topic of live streaming or live links to send in written submissions, which they have done and I've read them all. I will consider all those written and oral submissions and give my decision in writing in due course. It will, of course, be uploaded on to the website.

Some of the written submissions deal with a range of different topics which are not on the agenda for

members; Mr Jonathan Dixey representing the Department of Health and Social Care; Ms Jenni Richards, King's Counsel, for the Care Quality Commission; Ms Victoria Butler-Cole, King's Counsel, Nursing Midwifery Council; NHS England represented by Mr Jason Beer, King's Counsel; and Ms Fiona Scalding, King's Counsel, representing the Royal College of Paediatrics and Child Health.

I will outline briefly what the Inquiry has done thus far and what remains to be done. My Lady, on 3 October, you, the solicitor to the Inquiry and I met many of the bereaved families and their solicitors to discuss the draft terms of reference. Parents made powerful and constructive observations about several issues, including the requirement for this Inquiry to investigate why these events happened, whether there were lies told or any cover-up of suspicions or concerns about Letby, the use of CCTV as a deterrent, and the need to avoid others suffering in the future as they

As you underlined in your opening statement made on 22 November, my Lady, it is unconscionable that this situation would occur again. That is our guiding principle. As part of the Secretary of State's consultation process, the leaders of the following

organisations were invited by the Inquiry to comment upon the draft terms of reference: the Countess Chester Hospital, the Nursing & Midwifery Council, the General Medical Council, the Royal College of Paediatrics and Child Health, NHS England, Cheshire and Merseyside Integrated Care Board, and the Care Quality Commission. Four responses were received from the NMC, the CQC, NHS England and the Royal College.

The terms of reference were set by the Secretary of State after consultation with my Lady. Appended to them are 30 questions. Enabling you to answer those questions is, and will remain, the relentless focus of the Inquiry team's work.

It is important at the outset to remember that the Inquiry is working at the same time as other proceedings and investigations are being carried out. There is a retrial on one count of the indictment that will start in June. In the Court of Appeal, there was a hearing of an application for leave to appeal against the convictions earlier this month. Judgment was reserved. There are continuing Nursing and Midwifery Council proceedings.

The landscape is complex. A series of orders have been made by the Crown Court pursuant to sections 45 and 46 of the Youth Justice and Criminal Evidence Act 1999

Health Service Ombudsman; Facere Melius, an organisation that conducted a review of the hospital; the General Medical Council; the Countess of Chester Hospital; Health Services Safety Investigations Board; National Guardian's Office, and the Patient Safety Commissioner. They were all made aware of their disclosure obligations and the relevant material that the Inquiry expects to receive. Nearly all have provided documents within strict timelines.

My Lady, as you know well, a public inquiry is not adversarial. Unlike the criminal and civil courts, there are no sides. It is quite unlike litigation. It is an inquisitorial process. It is a search for the truth in connection with all the issues the Inquiry is charged to investigate. Core Participants are those individuals and organisations who you, my Lady, recognise meet the criteria for designation as Core Participants within Rule 5 of the Inquiry Rules 2006 and whom you have decided in the exercise of your discretion should have such status.

Those who have been designated as Core Participants and their legal teams are important to the success of the Inquiry's work and are expected to assist you in the work of the Inquiry. We suggest, my Lady, that assistance will be viewed through the multiple

in respect of the publication of information that may tend to identify the babies, their parents and some who gave evidence during the criminal trial. Accordingly, the Inquiry legal team have applied ciphers and redactions in respect of those whose names cannot be published. There is also in force an order of the Court of Appeal, an order under section 4(2) of the Contempt of Court Act 1981, prohibiting any reporting for the time being of the appeal to avoid prejudicing the retrial.

As you have already stated, my Lady, this Inquiry is bound by all of these existing orders, as is everyone else, whether in this Inquiry room or elsewhere.

Material was first provided to the Inquiry by
Cheshire Police in the week of 20 November 2023, just
one month after the Inquiry was established. We are
grateful for their co-operation with the Inquiry. In
October 2023, the solicitor to the Inquiry, Mr Tim
Suter, met with around 18 organisations. These
included: the National Neonatal Research Database; the
Royal College of Nursing; the Royal College of
Paediatrics and Child Health; the NHS Cheshire and
Merseyside Integrated Care board; NHS England; the Care
Quality Commission; the Liverpool Women's Hospital; the
Nursing & Midwifery Council; the Parliamentary and

lenses of genuine engagement with the specific issues under investigation, of reflection and of transparency about errors that were made, and a demonstrable willingness to effect change where it is required to keep babies safe in hospital. We have invited all Core Participants to consider where changes are required within their organisation and how they are implementing those changes now.

There are some organisations and individuals who were not granted Core Participant status, but they all have relevant evidence to share with the Inquiry and which will be of assistance to the Inquiry's work.

Within a few days of publication of the terms of reference, the first letter making a request for evidence, known as a Rule 9 request, was issued to the Countess of Chester Hospital. Within a month, twenty Rule 9 requests had been made. These initial requests were to many of the organisations I have already mentioned so as to obtain from them core materials and a witness statement. Each organisation has been asked to respond to specific requests about governance and management, the care and safety of babies, specific events at the Countess of Chester Hospital, and what changes have been made, or should be made, following those events.

By 10 January, the number of Rule 9 requests issued to organisations totalled 35 and included further organisations such as the Hospital Consultants and Specialists Association, the British Medical Association, neonatal charities, Cheshire West and Chester Council, Healthwatch England, the British Association of Perinatal Medicine, and two organisations representing whistle-blowers. The Hospital Consultants and Specialists Association was contacted by the Inquiry about its survey of 500 members concerning patient safety issues which was undertaken for a documentary broadcast on ITV in November last year.

It is right to pause at this point and record the assistance the Inquiry has derived from some excellent work by members of the press and broadcast media. There have been documentaries broadcast on BBC and ITV, newspaper articles and reviews in professional journals and podcasts, one of which has been listened to by millions of people. Some of these touch upon or overlap with Part B and Part C of the Inquiry's terms of reference. A number have provided important insight that has helped our work, and we have identified some witnesses based on the information within those articles, broadcasts and podcasts.

In respect of Part C of the Inquiry's terms of

A few nurses, midwives and doctors received questionnaires to complete. The vast majority, however, were sent a pack of documents alongside Rule 9 requests. The pack, which is bespoke to each witness, usually contains any previous statements made by the witness and every document referred to in the Rule 9 request. So far, questions have been asked about more than 4,000 documents. We acknowledge that many of the Rule 9 requests are searching, sometimes probing. They require a detailed response. The provision of witness packs and related documents will have significantly reduced the burden in the preparation of statements in response. Fewer than 15 of the identified Part B witnesses are yet to receive Rule 9 letters. This includes some for whom contact details are awaited and all efforts will be made to ensure we contact those individuals, including the use of tracing agents if necessary.

We expect to receive most of the witness statements in response to the Inquiry Rule 9s by the end of next month. In an email sent to Core Participants on 30 April, we provided a table with details of the first 37 questionnaires and witness statements received in response to these Rule 9 letters. We have committed to providing regular updates as further statements are received and disclosed.

reference, we have received or requested more than 85 statements. The majority of Rule 9s, however, have been issued in respect of Part B witnesses. 188 requests have been made to individuals in the following groups; midwives, nurses, doctors, managers, former board members and non-executive directors, and, finally, those involved in external reviews conducted by the Royal College of Paediatrics and Child Health, the Care Quality Commission, former coroners and coronial staff, and medical staff at other hospitals. These Rule 9 requests have been issued since 2 February and the majority were sent out by the end of April.

To prepare a detailed Rule 9 request requires a review of hundreds, and sometimes thousands, of pages of materials and a necessary focus on the key issues. Detailed questions have been asked about involvement in the care of particular babies, suspicions and concerns about Letby, the mortality rate and the safety of babies on the neonatal unit, investigations into the increased mortality rate, and other related issues. Questions are asked about why suspicions were not reported to the police sooner, how the grievance procedure was handled, and what the board members were doing. The questions run into the hundreds. We are looking for candid and reflective evidence to be provided in response.

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Expert evidence. Core Participants were informed on 11 December last year that the Inquiry intended to instruct two experts in relation to Part C of the Inquiry's terms of reference. Draft letters of instruction were provided to them with an opportunity for observations or input. The final letters of instruction were issued in early January this year and the two instructed experts within Part C are Professor Mary Dixon-Woods and Sir Robert Francis, King's Counsel.

Professor Mary Dixon-Woods is the director of this institute and the Health Foundation Professor of Healthcare Improvement Studies in the Department of Public Health and Primary Care at the University of Cambridge. Professor Dixon-Woods is instructed to report on cultural issues in the NHS, in particular what represents a healthy culture, her views on safety issues and expected standards for openness, transparency and candour.

Sir Robert Francis, King's Counsel, is a barrister and expert in medical law. Sir Robert, of course, was the Chair of the Mid Staffordshire NHS Foundation Trust Public Inquiry and has been involved in several investigations and inquiries into NHS care and patient safety. Sir Robert's instructions relate to, amongst other things, the implementation of recommendations made

by previous reviews and inquiries into NHS patient care.

Their final reports are expected to be received by June and will be made available to Core Participants as soon as possible thereafter. The Inquiry also intends to instruct Professor John Bowers, King's Counsel, distinguished employment lawyer and author, a Principal of Brasenose College Oxford. A proposed letter of instruction to Professor Bowers surrounding the whistle blowing, disciplinary and grievance procedures in place at the hospital will be circulated to Core Participants for comment before the end of May.

In your video statement in November, my Lady, you stated that you wished to know what recommendations were made in previous NHS inquiries and whether they were implemented. You asked what difference did the recommendations make? At the commencement of the Inquiry, and in response to question 28 appended to the terms of reference, the Inquiry legal team began to prepare a table to reflect the level of implementation of recommendations made by previous inquiries. This was a huge piece of work involving a review of every major inquiry into healthcare in England and Wales in the last 30 years, the recommendations made and whether, as far as we are able to ascertain from our public research, the recommendations have been implemented.

is to obtain information about governance and accountability, policies, staffing and cultural issues, working relationships between and across professionals, the reporting and managing of concerns, support for bereavement, and current practice and procedures in neonatal units to keep babies safe.

Every trust completed and returned the questionnaire with supporting materials. The Nuffield Trust has assisted the Inquiry team by reviewing and analysing responses and, on 3 May, all Core Participants received the Nuffield's report.

The Inquiry has also issued a staff survey to those who work within or in connection with neonatal units in the NHS. The survey were issued to relevant staff working in 121 NHS Trusts by the charity Picker between 4 March and 8 April this year. The purpose of the survey is to obtain views on the working relationships between professionals in the neonatal units, including senior managers, and to receive views about the culture of each unit. More than 7,500 responses were received. Core Participants will shortly receive Picker's analysis of the themes from the survey. Together with the Nuffield report and questionnaires, this evidence should help the Inquiry and Core Participants to understand current issues in neonatal

The Inquiry table was shared with all Core
Participants on 2 February this year and we are grateful
for the feedback received, particularly from the
Department of Health and Social Care. We have also met
with the Health and Social Care Select Committee of the
House of Commons who have been investigating the
implementation of recommendations by a number of
previous public inquiries and we have shared our work
with them. The Inquiry table provides a comprehensive
summary and will be available for review on the
Inquiry's website from today.

We hope it will assist all Core Participants and the wider public to understand what has and has not been addressed following previous inquiries. What did all those inquiries achieve? Where does accountability lie where recommendations were not implemented? My Lady, these are some of the issues to which the Inquiry will return during the oral hearings.

As my Lady also said in November, a detailed questionnaire was issued in the autumn of 2023 on behalf of the Inquiry to hospitals in England with a neonatal unit, save for the Countess of Chester. The questionnaire was issued with a request that it should be completed by both the medical director and a senior non-clinical manager. The purpose of the questionnaire

care which are relevant when identifying the best ways to keep babies safe in hospital.

May I turn now to disclosure. Disclosure to Core Participants has been taking place in tranches of documents from material providers and when the review processes and sensitivity checks have been completed. To date, 92,000 pages of disclosure have been provided to all Core Participants. The work to review, redact, cipher and disclose materials is resource-intensive. We must take particular care to ensure that materials are disclosed on the basis that they are ready for use in the hearings, including ciphering of names that are protected by the court orders I mentioned earlier.

The volume of disclosure received in the five months this year and the regular updates and explanations about specific materials should reassure everyone that the process is very much underway. We know, as in any large disclosure exercise, that Core Participants will be keen to ensure that they receive materials in time for the oral hearings. On Monday of this week, Core Participants received an outline and timetable for the disclosure that it is anticipated will be provided over the next few months. That outline does not take into consideration unfiltered material very recently provided by the Countess of Chester. I say

unfiltered because it is currently unclear how much of the documentation provided by the hospital has already been received by the Inquiry or how relevant the material is to the terms of reference.

Managing and reviewing the recent material is a matter of priority for everyone and Mr Kennedy, KC, and I will be discussing this further tomorrow. It is likely further questions will need to be sent to some of the existing Rule 9 recipients and updating those Rule 9s will be prioritised by the Inquiry counsel team.

The hearings and core bundle. The Inquiry legal team is building a set of essential documents in a core electronic bundle for the use of Core Participants and their advocates when preparing for the oral hearing. This core bundle with its detailed index should be available in the first week of June. A chronology prepared by the Inquiry legal team will follow shortly after that. By the end of the oral hearings, Core Participants will have been invited to agree or add to the chronology and to highlight any factual matters they say remain in dispute.

In your opening statement made on November 22, my Lady, you indicated that you would wish to begin hearing the evidence this autumn. The Inquiry Secretary and her team have been working hard to secure a venue for the

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The Inquiry is already aware that some parents do wish to give written and oral evidence. I will work with each of them and their lawyers to support them to provide that evidence and, my Lady, I will invite you in due course to consider specific and individual special measures as requested by each individual parent.

Evidence of the parents and the pen portraits of their children will provide our focus. In the unlikely event that there are any submissions to be made by any other Core Participants or the media in respect of a parent's evidence and the manner in which it is proposed to be given, we suggest that those submissions are made in writing to my Lady and that there should not be a need for any oral hearing in respect of the special measures as applied to them. We hope that special measures for the parents can be agreed and determined by my Lady by the end of June.

By the end of June, the Inquiry intends to provide Core Participants with a provisional list of witnesses to be called. My understanding from discussions with other counsel is that Core Participant witnesses are expecting to give oral evidence where required to do so. My Lady, you may wish to invite observations from Core Participants on our provisional witness list and before

oral hearings. After a wide-ranging search, it was not possible to find a suitable venue in Chester. The Inquiry has very recently secured the use of the Town Hall in Liverpool for the hearings this autumn. We are extremely grateful to the people of Liverpool, to the City Council and Lord Mayor for generously making the space available to us and for working to assist the Inquiry.

The Inquiry will commence substantive evidential hearings on Tuesday, 10 September 2024, thereafter sitting Monday to Thursdays and taking a half-term break in October. During the first week, it is the intention of the Inquiry team opening and any opening statements from Core Participants will be heard. My Lady, after today's hearing, we will invite you to make a direction setting a timetable for the service of written opening statements and any guidance you may wish to give Core Participants in respect of their oral statements.

During the week of 16 September, we seek to move on to the substantive evidence to be heard within Part A. The evidence of the parents will be heard at the beginning of the Inquiry. Unlike the recipients of all other Rule 9s, we have made it clear that no parent is required to provide a statement. The parents need only share their experiences as far as they wish to do

it is finalised. Inevitably, a few of the witnesses will be identified as our work continues, but it is important to scope the nature and extent of the hearings where we can.

Whilst the counsel team will broadly aim to call evidence in the oral hearings investigating Parts A, B and C in sequence, some witness evidence takes in questions posed within Parts B and C and some who address Part C alone might usefully be interposed immediately after Part A. The order of witnesses will be kept under constant review. We will publish hearing timetables on the website so that the media and the public are aware of the evidence that will be heard. We will, of course, consult with Core Participant teams in respect of witness lists before then.

Where reporting restrictions have been made in respect of any individual pursuant to sections 45 and 46 of the Youth Justice and Criminal Evidence Act 1999, the Inquiry cannot publish those names and will use ciphers referring to the persons concerned during oral evidence. In the case of any other witness or person concerned in the Inquiry, if special measures, including anonymity, are sought in respect of their evidence, applications for a section 19 order will need to be made. Where any such application is made, and I say nothing about that

at this stage, the Inquiry will notify the media so that written submissions can be made in the first instance. I am aware, my Lady, that you would be able to accommodate an oral hearing about special measures, in the event one proves necessary, in August and well before the oral evidence begins.

On 24 April, a document was sent to all Core Participants explaining how you intend to apply Rule 10 of the Inquiry Rules 2006. Rather than prohibit, in accordance with the general principle, questioning by any advocate other than counsel to the Inquiry, your document sets out a process whereby some limited questions by Core Participant advocates will be considered in respect of some witnesses. My Lady, you have made it clear that you expect counsel for the Inquiry to manage the Rule 10 process insofar as it is possible to do so and that you will keep the protocol under review as the hearing progresses.

Finally, my Lady, and with the assistance of Mr Greg Callus of counsel, the Inquiry legal team have provided written submissions on the intersection of your duties under section 18 of the Inquiries Act 2005 with the Crown Court reporting restrictions orders already made. My Lady, you have received submissions from a number of Core Participants and the media on this

refer to them as the Group 1 families.

LADY THIRLWALL: Very well. Thank you.

MR SKELTON: My Lady, I anticipate there's no need to repeat all the points made in the Group 1 families' written submissions. You have read them and most of the salient points have been summarised by Ms Langdale in her written submissions in advance of today.

The key point to emphasise, with which I understand there's no disagreement, is that the families will need access to a live video feed that has the facility to be paused and played back so that they can view the proceedings remotely, either in immediate time or at a time and pace of their own choosing.

LADY THIRLWALL: Yes and that's certainly my understanding. I know enquiries were made to establish what was possible and that was one of the things. That combination, we understand, is possible.

MR SKELTON: I'm grateful. The principal point of contention, therefore, is whether there should or shouldn't be or cannot be a live public broadcast of the witness evidence as argued for by the Countess of Chester Hospital NHS Foundation Trust and by your own counsel.

Turning first to the arguments advanced by the hospital, the starting point, my Lady, for the

point, including how the oral evidence should be transmitted. We have provided written submissions in response.

Given the Crown Court orders which are in place and the need to avoid breach of those orders, we submit that the oral evidence should be shared with Core Participants and the press over live link without any time delay and subject to undertakings, and members of the public should be able to attend the hearings in person.

The Inquiry team consider that this will meet the requirements in respect of section 18 of the Inquiries Act 2005. Furthermore, where the parents are unable to view the evidence at the time that it is given, they should be able to view a recording of that evidence as requested.

17 My Lady, that concludes our update.

LADY THIRLWALL: Thank you very much indeed, Ms Langdale.
 We will now move into submissions from other parties in
 relation to live links and live streaming.

21 Submissions by MR SKELTON

MR SKELTON: My Lady, I am Peter Skelton. I represent the
 Families with Mr Sharghy of Children A, B, I, L, M, N
 and Q and I am instructed by Switalskis and Irwin
 Mitchell. Taking your counsel's lead, if I may, I will

1 consideration of the issue of public broadcast is the 2 basic fact that the multiple murders and attempted 3 murders of babies committed by Lucy Letby are some of

the most heinous and heart-rending crimes ever committed in the UK. That is why this is a public inquiry, not a

in the UK. That is why this is a public inquiry, not a private inquiry or internal investigation. The public

7 need to see and to hear directly from the staff of the

8 hospital, its nursing staff, its doctors, its

administrators, managers and board members as to how and
 why these appalling events happened. That process needs

to occur in public because public understanding and
 public accountability are a vital part of the process.

LADY THIRLWALL: Just pause there, Mr Skelton. Just so
 there's no misunderstanding, the Inquiry is going to be
 in public.

16 MR SKELTON: Yes.

17 LADY THIRLWALL: The question of broadcasting is a separate

18 thing

MR SKELTON: It is, my Lady, but it will be in public in one
 building in one city in the UK which most people in the
 public will not be able to attend.

LADY THIRLWALL: So do you say that's not then in public?

MR SKELTON: Well, it is. It complies with the Act. That
 is clearly correct. It's sufficient to comply with the

25 Act in that people can theoretically attend if they wish

to. The arguments, I think, on behalf of the families is that isn't sufficient for a public inquiry of this nature and needs to go further for reasons of good principle. And those reasons I won't repeat. They are eloquently articulated by Mr Bunting in his written submissions and I anticipate he will be address you on them in detail orally on behalf of the media organisations.

Madam, in the modern era, the objective of a public hearing is facilitated and fulfilled by technology. That of course doesn't occur routinely in the court system but it does occur routinely in the public inquiry system, and it allows anyone to watch public inquiry proceedings online and to see and hear the witnesses, give their evidence at or shortly after they do so and all of us, or some of us in this room, will have seen that happening in some of the inquiries, the Covid Inquiry and the Post Office Inquiry, which are going on at the moment.

The modern age, my Lady, has also brought a proliferation of conspiracy theories which sprout, spread and fester on social media blogs and on websites and Lucy Letby's crimes, in particular, continue to be the subject of such conspiracies, some of which are grossly offensive and distressing for the families of

evidence. They won't be able to judge the credibility of the evidence. They won't take the time to look at the evidence. Online, evidence or facts are often shared by way of video clips, by way of references to websites which contain shots of video and so on and so forth. If that video isn't available and all you can refer to is a transcript produced by lawyers at the end of a hearing, that simply isn't going to be the antidote needed. It doesn't function in that way. People don't take the time to read a 100-page transcript in the same way that they will take the time to look at an important clip of particular evidence that bears upon a conspiracy theory.

My Lady, that is the secondary point. The primary point is this is a public inquiry and the public will attend online. That is the primary submission.

Conspiracy theory eradication is a secondary submission.

18 LADY THIRLWALL: I understand.

MR SKELTON: The upshot of this, my Lady, is that the Group 1 families, and the other families that will advocate to you today, say that there must be a live broadcast unless there really are compelling reasons as to why that's not possible or lawful.

My Lady, the hospital submits to you that if its staff give evidence in a live broadcast there is a real

her victims, just as similar theories harmed the grieving families of school shootings in the United States.

My Lady, one of the most effective antidotes to those theories and the damage that they cause will be to see and to hear the people involved in these crimes or involved in the hospital to give a true and comprehensive account of the facts, as occurs in almost all other public inquiries. A documentary written archive of their evidence is simply not good enough. Few people, other than lawyers and the media, will take the time to actually read it.

LADY THIRLWALL: Can you just develop that a little bit? So
 we understand about conspiracy theories, most of which
 are online. So just explain a little bit more how this
 would be -- it's an interesting submission -- an
 effective antidote.

MR SKELTON: As I understand it, your counsel's proposal is
 that the default position will be that there will be no
 publicly available broadcast.

21 LADY THIRLWALL: Don't worry about what everyone else is
 22 submitting. Just help me about how this would be an
 23 effective antidote.

MR SKELTON: People won't be able to see the witness give evidence. They won't be able to hear the witness give

risk that they may be less inclined to speak frankly and with candour. That is, with respect, an extraordinary submission to make for several reasons. First, all the staff working at the hospital are public servants. They have a moral obligation to give a true and complete account to the families and to you and to the public for what has happened to the babies that they were duty-bound to care for and to protect and may, in some instances, have failed to protect.

Second, this is a statutory public inquiry. The hospital staff have a legal obligation to tell you the complete, unvarnished truth about what happened.

Third, they have both a legal and a professional duty of candour to the families and to the public. My Lady, that latter duty is particularly important given the history of what happened at the time of Lucy Letby's crimes, whereby families were not told of the growing suspicions on the part of senior medical staff that she may have killed their or other people's children, with the result that some of them were left with false beliefs about their children's deaths or injuries or, in some cases, were denied the opportunity to take their children to other hospitals because they were under the terrible misapprehension that the Countess of Chester Hospital was safe.

My Lady, it will of course be stressful, and sometimes distressing, for hospital staff to give evidence to this Inquiry in a live public transmission, but that stress, with respect, is wholly outweighed by the two other factors I have identified. LADY THIRLWALL: Can I just ask you whether you think --you're accepting that it's stressful and distressing to give evidence in a live public broadcast; is it more or less or different from giving it when it's being live linked and people are in the room? I'm just interested in your view about that. MR SKELTON: My Lady, my preliminary view when reading those submissions was actually the main stress is attending and being in this kind of room. This is stressful to give legal submissions, let alone give evidence. It will be a similar type of room, I anticipate. You and your counsel and legal team will be in the same position, there will be several ranks of lawyers, public journalists. That is inherently very stressful. The

attending.

My Lady, there may be circumstances in which a broadcast would in fact prevent a particular witness

available on YouTube or some archive, it is difficult to

see how that tips the balance. The stress is really

extra bit of knowing that a public broadcast is

MR SKELTON: It is. My Lady, I'm going to come on to the fact that it shouldn't be insurmountable.

LADY THIRLWALL: All right. So you are going to make submissions on that. Take it in your own order.

MR SKELTON: The families don't accept, without a much clearer and detailed explanation, your counsel's view that it will be impossible to maintain compliance with the orders if the hearings are broadcast with a delay of, say, 15 minutes or even up to an hour or so. In the Undercover Policing Inquiry, for example, evidence is given by police witnesses in circumstances where the Chair has made multiple restriction orders to protect the identities and the lives, indeed, of many witnesses and other people and to protect sensitive information on the part of the government and the police.

During the hearings, warnings are repeatedly given about the need to comply with the existing restriction orders and a team of police officers and lawyers, not just the Inquiry's legal team, monitor the evidence closely in real time so that they can immediately identify the release of protected information and seek restriction orders preventing its publication.

My Lady, this is an inherently pressurised process, but it occurs effectively within a 15-minute window and where a restriction order is made, the

from telling the whole truth. You will be aware of that from your time on the Bench, that there are special measures that can and need to be taken, and you have the powers under the Act to make restriction orders and you have at your discretion and power to make practical measures to prevent and minimise the stress on witnesses in certain circumstances.

There may also be a small number of cases where a broadcast of the evidence would in fact cause a witness or their families to suffer significant harm that cannot be managed by other practical measures or restriction orders. But those instances will be rare and they shouldn't be the rule. The rule should be public broadcast and the exception should be that a particular broadcast should be not publicly available.

My Lady, both the Countess of Chester Hospital and your counsel emphasised the need to comply and maintain the anonymity orders made in the Crown Court and you yourself have emphasised that today. It is, of course, an important point and it will undoubtedly place a significant logistical burden on your legal team who will need to impose restrictions on evidence and monitor the release of potentially identifying information.

LADY THIRLWALL: That's quite a big logistical exercise, isn't it?

relevant parts of the hearing are never publicly broadcast. It's difficult to see, my Lady, why this can't occur as a matter of practicality in this Inquiry where the stakes are far less fraught and the index information much easier to spot. You will no doubt be warning everyone attending the hearings each day about the need for compliance with the Crown Court orders.

Further, many of your witnesses will be giving evidence about matters where the nature of the identifying or potentially identifying information will be readily recognisable in advance, or it will be confined to particular stretches of their testimony that can be prepared for in advance so that they are more closely monitored.

My Lady, importantly it should also be borne in mind that your legal team are not alone in wanting to preserve the identities of the people who are the subject of the Crown Court's orders. The representatives of the families and of the hospital itself are also committed to doing so and throughout the hearings they will also be actively alert to the disclosure of any information that could potentially breach the Crown Court's orders. In other words, there will be an immense amount of scrutiny brought to bear on the live evidence as it is happening and it is difficult

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to see how that level of scrutiny, together with a reasonable period of delay, will not be sufficient in all the circumstances.

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In summary, my Lady, the Group 1 families strongly submit that the default position should be to have a delayed public broadcast, and it will then be open to you on application or at your own discretion to adopt a different approach in respect of particular witnesses where the risks may be high or too high to be manageable or particular parts of their testimony too high to be manageable if you are persuaded that that is the case and that there is a real risk of improper disclosure in that instance.

My Lady, those are my submissions on the principal point. As you indicated in your opening remarks, the focus of today's hearing is on the video broadcast of the oral hearings, but you will be aware of the families' concern as to how much work there is to be done before the September hearings and the substantive hearings are due to start. It is, of course, recognised that you and your team are working extremely hard but you appreciate that the families' representatives will need to catch up very rapidly if they are to participate fully and effectively at those hearings. The more compressed the timetable, the higher the volume of

whether at the Countess of Chester Hospital or elsewhere, it must be called out.

Lessons must be learned. As the US Chief Justice Brandeis said in 1913: "Sunlight is said to be the best disinfectant." This is why the families must be at the heart of all the work the Inquiry does. In Part B, in our respectful submission, the starting point must be that all witnesses who have relevant evidence to give must be called. All relevant documents must be disclosed subject to redactions as appropriate. There must be as full a public scrutiny as possible of the Inquiry hearings. We appreciate that a balance needs to be struck consistent with the orders made in the Crown Court, about the need to secure the attendance of all relevant witnesses. There must be transparency.

In our respectful submission, as is set out in our submission which I won't repeat, we agree with Mr Skelton that the starting point should be that public presence at the hearing should be able to have access to its proceedings, that any derogation from that would need to be justified. And for your note, my Lady, if I may, please, our position on this is set out in our written submissions at paragraphs 25 in your bundle, page 19.

LADY THIRLWALL: Thank you. 35

documentary and witness evidence to consider at short notice, the more intense the degree of support that the families will need so that they can understand and cope with what will be an extremely difficult and distressing process for them.

As Ms Langdale indicated, a further and final preliminary hearing may be necessary if major issues arise that require submissions and resolution by you before September, and that indication is gratefully received.

Unless I can assist you further.

12 LADY THIRLWALL: No. Thank you very much indeed, 13 Mr Skelton. Mr Browne.

Submissions by MR BROWNE

15 MR BROWNE: My Lady, as you know, I appear with Simon Driver 16 and Sara Sutherland on behalf of the parents of Baby D, 17 Baby J and Baby K. We're instructed by Sara Stanger of 18 Bond Turner and Elen Roberts of Gamlins. These parents 19 very much welcome the setting up of this Inquiry and 20 your appointment as Chair. They are confident that your 21 Inquiry will be full, thorough, searching and vigorous. 22 Parents want answers as to how it was that Letby was 23 able to commit the hideous and wicked crimes that she 24 did. Where fault of whatever type is identified, 25 whether it be individual, corporate or regulatory,

MR BROWNE: I don't propose to repeat those, but we respectfully associate ourselves with Mr Skelton in that regard.

There are certain other specific matters which I wish to address you on shortly, if I may, please.

6 LADY THIRLWALL: In relation to this topic?

7 MR BROWNE: No, I'm going to move off this topic, unless you 8 think I can assist you further.

9 LADY THIRLWALL: Do you want to say anything about the 10 questions I asked Mr Skelton about the reduction of 11 conspiracy theories by reason for broadcasting?

MR BROWNE: The reason I mentioned Chief Justice Brandeis's 12 13 observations is it is clearly going to be of importance 14 that the public widely have confidence in the Inquiry. 15 Whilst the families are at the heart of the Inquiry,

16 this is a public inquiry and the public will be

17 interested in the proceedings and the balance has to be

18 struck -- I recognise that -- between ensuring the

19 preservation of the orders made by the Crown Court with

20 the need for public to access more widely. I don't

21 dispute for a moment that, as suggested by counsel to

22 the Inquiry, compliance with section 19 of the Act is

ensured by what is proposed by counsel to the Inquiry. 24 It is a true public inquiry. But, as put by Mr Skelton,

25 the question I think goes a little bit beyond that as to

1 what is going to be necessary to ensure that the 2 Inquiry's work is seen to be done, not just by those who 3 can be physically present at the location --LADY THIRLWALL: Or as through the press, who are usually 4 5 described as the eyes and ears of the public. MR BROWNE: They are and they will be present and no doubt 6 7 will report on matters that they consider to be of 8 importance and relevance. I recognise again that that 9 does provide the assurance of compliance with 10 section 18. But the point made by Mr Skelton, with 11 which we respectfully agree, is for your Inquiry to 12 deliver, if I might respectfully put it this way, to the 13 public to ensure that Letby's actions in the context in 14 which they occurred have been fully explored, the wider 15 public should have access to the proceedings as they go 16 on. But again I recognise there's a balance in that 17 regard. The balance and what happened is ensuring that 18 wider accountability, if I might put it that way, versus 19 the need to ensure the continued protection of the 20 identification of the parents of the babies and the need 21 to secure the attendance of key witnesses. 22 But the starting point, in our respectful 23

But the starting point, in our respectful submission, should be that, as with most major public inquiries in modern times, recent times, there is a link provided so that members of the public can view in real

Paragraph 18, please, of our submissions at page 18. This is the ability that we seek for the parents to give evidence from a location remote from the hearing room, and possibly in circumstances which are accompanied by only those being present being my Lady, counsel to the Inquiry, the legal team for that family and Secretary to the Inquiry.

8 **LADY THIRLWALL:** Yes, I have seen what you have set out there. Obviously there will be discussions, as counsel to the Inquiry has suggested, to see what can be worked out without the need for a hearing about that. I would imagine that there wouldn't be any great difficulty about that.

MR BROWNE: I am very grateful.

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LADY THIRLWALL: There's no need, certainly from my
 perspective, for you to rehearse that. I have read what
 you have to say and I understand your reasons for it.

MR BROWNE: I mention it, my Lady, simply because it is a matter of considerable importance to the family --

20 LADY THIRLWALL: I quite understand.

21 MR BROWNE: -- and they asked me specifically to mention it.

22 LADY THIRLWALL: I assumed that was the case.

23 **MR BROWNE:** The second point relates to a matter raised by my learned friend Ms Langdale, King's counsel, in her submission at 53(e), paragraph 18. This is the use of

submission at 53(e), paragraph 18. This is the use of 39

time, subject to the 10 to 15-minute delay to cure any inadvertent slips.

3 **LADY THIRLWALL:** Just thinking a little bit more broadly of
4 broadcasts, obviously this would be to the world, not
5 just within the jurisdiction. So there would be no
6 control, would there, about what was said about anything
7 that might be subject to court orders in the
8 United Kingdom?

9 MR BROWNE: We recognise, of course, that that is a factor 10 that must be weighed in the balance that outside this 11 jurisdiction those orders, if I might put it this way, 12 don't bite and the risk of breach of court orders is 13 a risk. We recognise that. That's why we respectfully 14 acknowledge there is a balance to be struck. But, 15 interestingly, only this week there was a publication in 16 the New Yorker taken down but access to that is still 17 available and will be available in the UK in the course 18 of the coming days, as I understand it.

We can't eliminate those risks. They have to be weighed in the balance, but our respectful submission is the key factor is ensuring public confidence in your Inquiry and that is best achieved by the provision of a link subject to delays.

24 LADY THIRLWALL: Thank you. You have five minutes left.

25 MR BROWNE: I will be less than that.

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1 mobile phones in the hearing room.

2 LADY THIRLWALL: Yes.

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MR BROWNE: Of course, mobile phones mustn't be used to
 record hearings or to take photographs or to take
 videos, but mobile phones are important to the families
 because they will be a means of communicating with us
 during the course of the Inquiry hearings.

8 LADY THIRLWALL: There will be no difficulty about that.
 9 MR BROWNE: I am very grateful. Thank you very much indeed.

Finally, a matter again raised by my learned

friend also at page 53, paragraph 16, and this is the
use of screens. The point we make here, if I may,
please, is there's a difference between witnesses giving
evidence in criminal proceedings who have the benefit of
special measures and will be coming to a court that has
been emptied especially for that purpose, give their
evidence behind a screen and then leave when their

evidence is complete. In this particular instance, the
parents who give evidence may well want to come into the

20 Inquiry room in due course. So we simply make the point 21 that there needs to be a consideration as to the

22 configuration of the room for those purposes.

23 LADY THIRLWALL: Of course. Thank you.

24 **MR BROWNE:** My Lady, nothing further.

25 **LADY THIRLWALL:** Thank you very much indeed Mr Browne.

Submissions by MR BAKER My Lady, I appear on behalf of Chi

MR BAKER: My Lady, I appear on behalf of Child C, Children E and F, Child G, Child H and Children O and P. I am instructed alongside Mr Jamieson and Ms Rong by Slater & Gordon, Oliver & Co and Harding Evans. We are Group 3.

LADY THIRLWALL: Thank you.

MR BAKER: The families whom I represent, and as are represented by Mr Skelton and Mr Browne, have all suffered unimaginable harm in unimaginable circumstances. Their desire in this case is for change so that others do not experience what they have experienced. We recognise that their interests and desires are at the core of this Inquiry and that the need for their protection but also meeting their wishes and desires are important issues, and that on occasion it will be necessary to strike a balance.

I agree with Mr Skelton and Mr Browne that the objective of a public hearing is met by providing access to the public so that the public can hear that evidence. That access may, of course, be limited to people in the room and the fulfilment of the requirements of the Act can be met by people in a room. But in the modern age, it has become the norm for inquiries to be broadcast and the greater public interest and greater public scrutiny

naming. There are three issues we say that are relevant on this issue: protecting the anonymity orders, the best evidence, and public perception into which falls conspiracy theory. The families are probably the largest group of individuals who receive benefit from anonymity orders. There are others, of course, but the majority are family members.

The potential risk of violation of the Crown Court orders should be recognised as a risk, but it should not be overstated. Similar orders were in place at the Manchester Arena Inquiry where witnesses have given evidence in preceding criminal proceedings and also provided evidence to the Inquiry. It was perfectly possible in that case to have a live broadcast of evidence, albeit with a delay.

Similarly, in the Independent Inquiry into Child Sexual Abuse, the need to protect the identity of the Core Participant witnesses was at the heart of that Inquiry too, but also it was managed again with a live broadcast and a delay. As Mr Skelton pointed out, the Undercover Policing Inquiry, where one doesn't need to think hard to imagine the level of security and concern that must exist around that inquiry, and even in that case a live broadcast, albeit with a delay, was managed.

So we would say that whilst those risks exist,

to be applied through the broadcasting of evidence. We would say any derogation from that norm must be clearly justified in a particular case, and that any derogation from that norm may also have unintended consequences which I will speak about in a moment.

The families who I represent have all considered the submissions made by counsel to the Inquiry and are grateful for the recognition of the risk, of course, that is created by live broadcast. But, despite that, and having considered it carefully, they still give me clear instructions in unambiguous terms that their desire is for this Inquiry to be broadcast live albeit, obviously, subject to a 15-minute delay. We would say the Inquiry should give real weight to their wishes on this issue, especially where it is given in understanding of the risks that may apply.

17 LADY THIRLWALL: When you say understanding the risks that18 may apply, what are you referring to?

MR BAKER: Of course the risks in relation to anonymity and
 how that might be managed. There are three issues,
 I would say.

LADY THIRLWALL: I don't want to pry, but I just want to
 make sure I have understood what you are saying.

24 MR BAKER: Of course. It is in relation to the risk of
 25 identification, jigsaw identification or inadvertent
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they are manageable realistically and should not be overstated.

Likewise, where there is a realistic risk of jigsaw identification, that risk is also identifiable and manageable through a combination of delay in broadcast and your power to make individual restriction orders where necessary. We would say for both of those risks it is not necessary to introduce a broad, potentially draconian, restriction on broadcasting where that brings about other consequences -- I will come on to those in a moment -- where that risk can be managed.

In relation to best evidence, those whom
I represent expect everybody who gives evidence before
the Inquiry should do so openly and truthfully. Against
a background of their experiences and the harm caused to
them, transparency is an essential component of change
and one of the fundamental desires that they have is
that the same experiences are not visited upon other
people in the future. They are saddened and concerned
by the suggestion that a lack of transparency may
continue.

The suggestion, whether implicit or explicit in the submissions on behalf of the Countess of Chester Hospital, that witnesses may not give a full account of their evidence if it is broadcast should not find favour

with this Inquiry. The same arguments could equally have applied in other inquiries and, again, have not been used as a means of applying a prohibition on live broadcasting.

We say the correct approach is that identified by Mr Bunting, and evidenced and supported in his submissions, that public scrutiny will encourage rather than discourage candour and honest reflection. If witnesses seek to respond to scrutiny by dissembling, they will be exposed by the process whether it is live broadcast or not, and the truth will emerge despite them, rather than with their aide.

Any witness willing to act in a way should be exposed, but any witness who is not prepared to be fully honest and candid with this Inquiry again should be the subject of public scrutiny.

Finally in relation to public perception, it is well known that the case has generated considerable public interest and that conspiracy theories have grown around it. Those have distressed considerably those individuals whom I represent. They are toxic, they are often ill-informed, and they ultimately grow in the shadows. We say that conspiracy theory in any case is a peculiar and toxic weed that grows in shadows and the more light that we put on this Inquiry, the less space

at the bottom of the pile. I think it's important to recognise that they exist and their effect is having a toxic impact upon those whom I represent.

LADY THIRLWALL: Yes. I was just thinking about that.

Assuming there were live broadcasts in the way that you submit, there would, I suppose, be the opportunity for people across the world to make clips of parts of the evidence and then subject it to some sort of commentary and the Inquiry would have no control over that.

MR BAKER: The Inquiry would have no control over that, but nor would the Inquiry have any control about individuals who wanted to extract text from evidence that was given, who wanted to misquote what text was given, to describe the demeanour of witnesses in the witness box in a misleading way. That element of conspiracy theory can't be removed because people will always do it.

If the images are there, if the video is there for people to see with their own eyes, they can exercise judgment about what they see. The public perception of what evidence is given and how it comes across is based upon what happened in the witness box, what people said and what they did. It isn't based upon third-hand accounts which may be derived from misquoted extracts, second-hand quotes from the media, or indeed misquoted extracts from the text of the Inquiry. Individuals can

there is for speculation and conspiracy.

There is also, my Lady, an important point in this: going back to my earlier submission, if there is an expectation that it is the norm that inquiries are live broadcast and if we remove that norm, if we depart from it, we hand a message to conspiracy theorists that there is something different about this case and that there is something to be hidden. That in of itself, we say, risks generating and populating conspiracy theories.

Now, of course, conspiracy theorists may speculate based upon on full transparency or no transparency, but one thing can be assured is if we show a lack of transparency, they will seize upon that and use it as a tool to beat us with. We would say that the removal of the live broadcast will hand to conspiracy theorists a sense that there is hidden information and it will lead to increased speculation and worsen those theories, those theories which --

LADY THIRLWALL: It's slightly curious, and again just reflecting on that, that the process and procedures of a public inquiry should be affected by conspiracy theorists who, as you say, are toxic and ill-informed.

24 MR BAKER: Yes. In terms of the priority of submissions,
 25 the three that I have made puts the conspiracy theorists

see with their own eyes what happened. That's an important point.

The second important point is that a conspiracy theorist will generate additional conspiracy from the idea that this Inquiry is having special restrictions applied to it. They will point to other inquiries and say, "It is the norm for it to be live broadcast. Why isn't it live broadcast in this case? It is because there is something to hide". Now, that is not the truth of course.

LADY THIRLWALL: No. Again, I think one should be quite
careful about saying, "It's the norm, it's the norm".
It's happened in a number of inquiries, not all
inquiries. It's interesting that you are adopting that
phrase which you are then attributing to the conspiracy
theorists.

MR BAKER: Of inquiries of this magnitude and importance, it is difficult to think of many recent public inquiries in the modern age where there has not been live broadcasting of the evidence that is being given. Of course, that may not be the case for every public inquiry, but the ones that the public will know about, the ones that they will see on the television and they will access themselves, all of those important inquiries are the subject of live broadcasting. Again, it's an

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1	important message then because if they can be broadcast,
2	even in the case of the Manchester Arena or the
3	Undercover Policing Inquiry with all the issues that may
4	attach to those in terms of sensitivity, then the public
5	will ask, "Why can't this one be broadcast?"
6	LADY THIRLWALL: Thank you. You said you would adopt what
7	Mr Skelton said about the practicalities. Is there
8	anything you want to add to that, given the position of
9	counsel to the Inquiry?
10	MR BAKER: No. I think providing that the live stream can
11	be provided to Core Participants without a delay, then
12	that will enable those I represent (who, in some cases,
13	are caring for seriously injured children and in other
14	cases have already taken a huge amount of time away from
15	work) to attend the criminal trial
16	LADY THIRLWALL: A live link whatever happens.
17	MR BAKER: They will be able to attend remotely. 2.
18	LADY THIRLWALL: Yes, of course.
19	MR BAKER: But the live link to them is important because
20	the point Mr Browne made, of course, is that they will
21	need to send us instructions possibly via
22	LADY THIRLWALL: There's no question about that. That is
23	going to happen.
24	MR BAKER: In terms of one point made by Ms Langdale was the
25	idea that the press may be able to make application to 49

be achieved by the use of live links controlled by the Inquiry. We therefore endorse the approach taken by counsel to the Inquiry and her proposals. What this would achieve is it would permit the public and the media, and I repeat, my Lady, as you have repeated, the observation about the media being the eyes and ears of the general public. The live linking of a public hearing would permit appropriate levels of access for the public and the media.

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We suggest that for the reasons which I've set out -- and I'm just going to, if I may, highlight two -that the access should be short of live streaming worldwide (in other words, option C that you canvassed in your note), as I say, for two principal reasons.

First, you will have seen that to inform our submissions we canvassed the views of members of staff and former members of staff of the hospital who have received Rule 9 notices to gauge what the feeling was. That has indicated a high level of anxiety I accept initially at the prospect of giving evidence but, more particularly, at the prospect of giving evidence which is live streamed.

23 LADY THIRLWALL: Can you deal with what Mr Skelton said about that, which is the really hard thing is to give evidence at all in this sort of arena and that the

broadcast or show aspects of evidence that was given by

2 the live link. Now, of course, that undoes some

3 problems. It allows witness evidence to be broadcast in

4 a way, but it also risks that evidence being filleted.

5 The problem, of course, is that if that evidence is

6 presented in gobbets, then the danger is that that may

7 be in of itself misinterpreted. We say the entirety of the evidence should be broadcast. Unless I can assist 8

9 you further.

> LADY THIRLWALL: No. Thank you very much indeed, Mr Baker. Bang on 15 minutes.

Submissions by MR KENNEDY

13 MR KENNEDY: My Lady, my name is Andrew Kennedy. I appear 14 with Thomas Hayes instructed by Emma Stockwell at Hill 15 Dickinson on behalf of the Countess of Chester Hospital.

> My Lady, can I start as I started in our written submissions, which some may not have seen, just by indicating the profound sorrow and regret for the events which are the subject of your Inquiry, and to reiterate our determination to work with you and provide as much assistance as we can for you to achieve the objectives set by your terms of reference.

I turn then to the issue at hand. I start from the proposition that the Trust is committed to the principle of Open Justice. What we say is that this can

additional element of live streaming is relatively minor. I don't know if you want to say anything about

MR KENNEDY: I was proposing to deal with it, so thank you. What I would say is this, that the process of giving evidence (so the requirement to attend and give oral evidence in front of a room of lawyers and media), that is something which, to a certain extent, those representing the witnesses can manage, they can prepare

10 witnesses for and, if needs be, a witness might be able 11 to observe part of the hearing, just to familiarise

12 themselves with the process and the environment.

> The concern clearly indicated to us is that if it is transmitted around the world, people fear more -they are more anxious, they find the prospect more stressful. It seems to us that there's some force in that -- I don't put it too highly -- but some force in that because people have seen what has happened in other inquiries, so the clipping of material from YouTube or from live broadcast. Whether that has engendered an inappropriate level of anxiety, it appears to have engendered a level of anxiety.

So in answer to Mr Skelton, I would say we can prepare for the rigours of giving evidence. What we can't really deal with is the fact that it is being

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transmitted around the world. 1 2 LADY THIRLWALL: Are you going to deal with what's been said 3 about what Mr Skelton said about candour? 4 MR KENNEDY: I am going to come to that, yes. I believe 5 it's helpful if I deal with it now. I acknowledge, 6 looking at it now, and listening particularly to 7 Mr Skelton, that we perhaps could and should have put 8 matters the other way round, that our desire, and no 9 doubt the Inquiry's desire, is for witnesses to be able 10 to speak frankly and with candour, and anything that can 11 be done to facilitate that should be done. So if 12 a witness is concerned about live streaming, then if we 13 can remove that concern, we can, we would suggest, 14 encourage candour, frankness and openness. So 15 I acknowledge the point he makes and, with the benefit 16 of hindsight, we should have put matters the other way 17 round.

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If I can just come back just briefly to the concerns, just so that I can just -- perhaps if I make good the point I make. The concerns appear to us to be based really on two factors. Firstly is past experience arising from the trial. So people are anxious because of experience from the trial. That has been fed by contact from the news media and contact on social media.

Secondly, one has to acknowledge that the majority

breadth of the orders in this case, it seems to us, places the Inquiry in a somewhat different position to other inquiries. There is, it seems to us, a significant risk of breach whether by inadvertence, as it's put in one submission, blurting out or by, as it's put, jigsaw identification.

I hear what my learned friend, Mr Skelton, I think said about an army of people in the Policing Inquiry overseeing evidence, but you too will be concerned to ensure no breach. It seems to us it's crucial that your focus and counsel's focus is on the evidence, rather than being concerned about the implications of what is being said, particularly trying to wrestle with the concept of jigsaw identification: does A lead to B lead to a breach of the order? So it seems to us that that concern is rightly put at the forefront of counsel to the Inquiry's submissions and we endorse what she says about that.

Where that leaves us, as we said in paragraph 12, is that a live link, as we put it, controlled by the Inquiry but effectively, as counsel to the Inquiry puts it in her note, is the solution on the particular facts of this Inquiry. So, my Lady, that is all I would say in terms of live streaming unless there's anything I can assist you with.

of those who are expressing concerns are members of staff at the hospital or former members of staff at the hospital whose roles do not normally equip them for the rigours of giving public testimony. As I say, we will have to address that and we will have to deal with that.

6 LADY THIRLWALL: That's often the case for witnesses of fact in criminal or civil trials.

MR KENNEDY: It is, but not under the glare of the worldwide media or the worldwide observer. So it's a more controlled, if I can put it, environment.

The concern it gives us is whether that will allow you to achieve or obtain the best evidence. I take on board the point that my learned friend Mr Bunting, King's Counsel, makes about publicity avoiding -- or a public hearing avoiding blame-shifting or exaggeration, but we will be a public hearing. The issue is the discrete one of live streaming.

So what we submit is that the proposal that your counsel makes, and that we would endorse, at best strikes the balance between material being publicly available and you securing the best evidence to reach appropriate conclusions.

The second concern we have is that which is set out by counsel to the Inquiry in her note. It concerns the breach of the reporting restriction orders. The

I was just going to, if I may, adopt also what my learned friend Ms Langdale, King's Counsel, says about the approach to documentary evidence. That's not something we addressed in our note, but that is an approach that is adopted in other inquiries and we see there is no reason for you not to adopt it in this Inquiry.

My Lady, I haven't dealt with the question that has been raised by some of conspiracy theorists. I can give you the benefit of my thoughts on that if it assists.

LADY THIRLWALL: Feel free to do so briefly. 12

MR KENNEDY: We would just say this: the concern is people clipping sections of live-streamed material. It was said by my learned friend Mr Baker, King's Counsel, that that may be done by the media, but Mr Bunting will tell vou that the media will act within the restriction orders. So the concern would be that if material is clipped from a YouTube broadcast, you, as you have said, have no control over how it is done and the potential for information to be put out in a way that is misleading is enormous. That feeds for the conspiracy theorists. That is the way for them to promulgate their theories.

The suggestion that people can still do it from

transcripts (in other words, Mr Baker's observation), it conflicts with how Mr Skelton put it and it seems to us it also conflicts with what we know about how people now consume their news, which is they are consuming it online. That provides some answer to the concern expressed about people doing the same but based on a transcript.

So, my Lady, those were our observations on conspiracy theorists.

LADY THIRLWALL: Thank you. Are those your submissions? **MR KENNEDY:** They are my submissions.

LADY THIRLWALL: Thank you very much. Mr Bunting.

Submissions by MR BUNTING

MR BUNTING: Good morning, my Lady. I now act on behalf of nine media organisations. To the eight that are already in my Lady's notes can be added Pressdram Limited, the publisher of the Private Eye. My Lady will note that the nine media organisations for whom I act make up all of the main media organisations at a national and a local level in terms of the print and the broadcast media.

My Lady, the reason that these nine media organisations are so keen to assist the Inquiry is because of the important public interest issues to which this Inquiry gives rise.

respectfully endorse the suggestion made by your counsel that members of the press should be permitted into the hearing room and should be permitted to access a live link. That is how we make sure we play the role that you identified, my Lady, of being the eyes and ears of the public.

Insofar as it was initially suggested by some Core
Participants that the media should only have access to a
delayed broadcast, we respectfully suggest that there's
no real justification for that. The media organisations
are responsible. They know the orders of the Crown
Court. Indeed, they played a role in the making of
those orders. They know the names to whom those orders
relate and they will comply with those orders, just as
they did throughout the criminal proceedings.

The second point is a much shorter one and it's one which echoes, I think, a point made by Mr Browne. We would like to be in the rooms. We would like to be able to fulfil our professional role but accredited members of the press tell me to do so they will need access to their mobile phones. They understand, of course, that the Inquiry's concerned about the use of telephones to broadcast the hearing. They won't do that. They can be trusted to act lawfully and responsibly in that regard. I would therefore be

you, my Lady: this Inquiry is profoundly important. It follows from the importance of those issues, my Lady, that there is a concomitant need for openness and transparency. Only by bringing these matters into the light can the public be reassured that all proper questions are being asked and that all proper lessons have been learned. Their interest, my Lady, is not prurient. The media organisations understand the significant human tragedies that are at the heart of this Inquiry. They do not seek to intrude on grief. What they do seek to do is to report in the public interest on those important issues and to do so in the same responsible way that they did at the criminal trial and at the appeal. We are grateful for the helpful comments made by your counsel about the press reporting today.

My Lady, I am going to make four short points about streaming. The reasons our points are short is because we broadly agree with the suggestions made by your counsel in their helpful note, and so my points are largely points of practical finessing rather than a principal taking on the issues.

The first issue is there is a need to ensure that we, as members of the press, are able to follow these proceedings live and contemporaneously. That's why we

grateful if the Inquiry permit them to do so.

LADY THIRLWALL: Mr Bunting, I can say there's no difficulty about that.

MR BUNTING: I am very grateful.

The third practical point that we make is as regards accessing material and the related points using any clips from the live stream. Realistically, our concern with this is that the note says that we would be provided with material at the end of the day. The note suggests that there will need to be a process so as to the enable people to apply for permission to use the live steam. The problem that we have is that journalists work to deadlines. Those deadlines can include the 6 o'clock news, for example, or deadlines for print publication. Therefore, we propose to work closely with your team, my Lady, to ensure that the logistics of how those practical matters can be addressed can be properly finessed. If there is a procedure in place, that will enable us to use that material quickly. It will also enable us to avoid repeatedly interrupting my Lady throughout the hearings on this case.

My Lady has heard well-argued submissions from Mr Skelton, Mr Browne and Mr Baker in favour of broadcasting and there's much in what they say with 60

which we agree. In particular, we agree that greater transparency will improve the Inquiry's investigative process. Like Mr Skelton, we also respectfully disagree that the concerns of public servants about giving evidence on a live stream should not be a decisive factor in the balance about the use of footage. Openness improves rather than undermines the quality of evidence from public servants. All of that is clear from the Divisional Court's judgment in *Wagstaff* to which we brought my Lady's attention.

We also specifically agreed greater openness can be an antidote to ill-informed speculation and rumours. My Lady, these are not just matters of submissions, they are matters of parity. We have drawn attention to two cases which touch upon this point in our written submissions. The first is the *Azelle Rodney* case in which it was said that openness can avoid the impression of a cover-up. That's footnote 7 on page 45. The second is the judgment of the Master of the Rolls, Lord Woolf in *Kaim Todner* in which he explained the purpose of Open Justice includes making uninformed and inaccurate comment about the proceedings less likely. That's footnote 6 on page 45.

My Lady, we hope to assist the victims. We hope to assist the families in this regard, even if my Lady

order is already in place, in particular, as regards some of the medical evidence in respect of whom Mr Justice Goss made orders. These are, as your counsel noted in their note, fact-sensitive matters in respect of which we would hope to assist you as the summer continues.

My Lady, those are the four points that I seek to make. We hope to work closely with your team so as to ensure openness is a reality in the substantive hearings. Unless I can assist you any further, those are the submissions of the media organisations.

LADY THIRLWALL: Thank you very much indeed, Mr Bunting.

Ms Langdale, would you like to say anything about

any of the submissions we have just heard?

MS LANGDALE: Just two matters, my Lady.

Firstly, clearly, the essential issue for my Lady is whether this should be live streamed or live linked. If my Lady accepts the submissions, in fact it now appears that the Countess of Chester, the media and ourselves as counsel to the Inquiry that it should be a live link, there would need to be further discussion about the practicalities and logistics involved. I'm not going to go into a response in relation to any of those because, of course, my Lady hasn't made a decision yet.

rules against their request for a full broadcast. My
Lady may consider that permitting the public to access
clips of the evidence through the media acting
responsibly will assist in ensuring that the family get
what they want, namely public access to the evidence,
but will do so in a responsible way. That's what we
hope to do throughout this Inquiry, not by live
streaming every moment of the Inquiry but by responsibly
using clips in news coverage. That's why we hope that
the practicalities and logistics of how we can obtain my
Lady's permission to do so can be finessed in discussion
with your team.

My Lady, the fourth point is as regards any future application for special measures or restriction orders. We have listened with care to what Ms Langdale, King's Counsel, has said this morning and we respectfully agree that those are matters that ought to be properly addressed through further submissions. We note the deadline in June for the special measures application in respect of the families and the suggestion of a further hearing later in the summer if and when that is necessary.

We also specifically agree with your counsel that there may be a need for the Inquiry to consider whether a restriction order is needed, even where an anonymity

As far as the families' position is concerned, lest it is not clear from the documentation I referred to today, we say very clearly of course Open Justice is important. Transparency is important. The public at large will have access to transcripts of evidence upon the conclusion of that day's evidence or as soon as practicable thereafter where there is much to be redacted because, of course, as Mr Kennedy suggests, it is the jigsaw identification as ordinary people giving evidence referring to colleagues that have those anonymity or other potential identification ciphers applied to them, that is where the difficulty will lie in redacting at the end of the day. But all of the evidence and the transcript will be made available and so will the documents that are referred to. So it's very much an interested informed member of the public can follow and see the evidence.

The question for us really, and where we land as counsel to the Inquiry, is the significance of the orders. The orders have to be complied with. Every inquiry is different. All of us in this room have managed inquiries, as counsel to the Inquiry or as Core Participants, where ciphers have been successfully applied with a short delay. This Inquiry we know will have international interest. We know the reporting has

extended internationally and the families' submissions			
don't directly address where there is reporting abroad			
from newspaper outlets or organisations registered			
abroad, what power does the Inquiry have at all to dea			
with breaches of those reporting restrictions orders.			
That is a matter of concern for us because they are			
there to be complied with. They are in place at the			
moment. They are there to be complied with.			
So, my Lady, nothing further than that.			

LADY THIRLWALL: Thank you very much indeed, Ms Langdale.

As I said at the beginning of this morning's proceedings, I will consider the helpful submissions that have been made by counsel, in addition to the written submissions that I have received from them and from others. And will then give my decision in due course.

You all now heard what has been happening since November and you will have observed quite the volume of work and considerable effort that has been required to get through so much work. I acknowledge immediately that everyone who is instructed in this case for Core Participants has a very large amount of work to do and that's where the focus of course now has to turn once I've made my decision in respect of this particular matter. I'm grateful for what's been done so far and

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I know that I can rely on each of you to ensure that every effort is made so that progress can be made so that we can begin in September.

It's worth just remembering for a moment it is highly unlikely, and I think it would be a first for any inquiry, if all the evidence was ready before we started. This isn't a trial. Evidence comes out during the course of an inquiry. I know that the teams, which are significant, are well equipped to deal with that given the necessary focus.

So renewed thanks for what you are about to do and I look forward to seeing you all probably in August but certainly in September. Thank you all very much. I will rise now.

15 (12.38 pm)

(The preliminary hearing concluded)

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