

OPUS 2

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Grenfell Tower Inquiry

Day 5

February 3, 2020

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1 Monday, 3 February 2020
 2 (10.00 am)
 3 Application in respect of an undertaking from the Attorney
 4 General touching upon self-incrimination
 5 SIR MARTIN MOORE-BICK: Good morning, everyone. Welcome to
 6 today's hearing. We are going to continue hearing
 7 submissions in relation to the application that I should
 8 seek an undertaking from the Attorney General in
 9 relation to evidence given by witnesses in the Inquiry.
 10 At this stage, I'm going to invite Mr Mansfield, who
 11 is instructed by the group of solicitors that we, for
 12 convenience, call Team 2 to come and make his
 13 submissions.

14 Yes, Mr Mansfield.
 15 MR MANSFIELD: Yes, thank you, sir, madam.
 16 Submissions on behalf of BSRs Team 2 by MR MANSFIELD
 17 MR MANSFIELD: May I begin by thanking both you, sir, and
 18 you, madam, for the opportunity that we have had since
 19 this application was made late last week. As we
 20 anticipated, managing to gather together the numbers
 21 involved in terms of the bereaved and the survivors and
 22 the residents is a major task. But in fact we did
 23 achieve that.
 24 I stand here today representing all the families of
 25 Team 2, there are a number of -- I'm not going through

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1 the numbers -- legal representatives, but also the
 2 families represented by Imran Khan, so it's two groups,
 3 in fact.
 4 SIR MARTIN MOORE-BICK: Thank you.
 5 MR MANSFIELD: There is, I can say at once, an overwhelming
 6 and strong consensus of these families in opposition to
 7 this application.
 8 What we have done, for your assistance -- I hope
 9 it's not too formidable -- is we have put together
 10 a hard-copy file. May I just make it a little bit
 11 easier. The first 12 or so pages are the actual
 12 submission.
 13 SIR MARTIN MOORE-BICK: Yes.
 14 MR MANSFIELD: The rest of it are materials that just make
 15 it easier, rather than going through transcripts. They
 16 are position statements, transcripts of these hearings
 17 and also the authority Baha Mousa, which has been
 18 referred to already. That's all in one place.
 19 SIR MARTIN MOORE-BICK: Thank you. That will be very
 20 useful. Just so that you know, we have both read your
 21 submissions; that's the first, I think, 13 pages of what
 22 we were sent.
 23 MR MANSFIELD: That is right.
 24 SIR MARTIN MOORE-BICK: I have to confess, for my own part,
 25 I didn't get beyond them, but I only got them this

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1 morning.
 2 MR MANSFIELD: Well, I only just got beyond them myself,
 3 because others have been working very hard over the
 4 weekend, for whose work I thank also.
 5 It may also be of assistance for you, therefore,
 6 having read them -- I'm certainly not intending, any
 7 more than anyone else does, to read them out verbatim or
 8 seriatim. I do wish, however, if I may, to highlight
 9 half a dozen points that arise out of the written
 10 submissions.

11 Before I do, I would ask for a moment,
 12 an opportunity, a further opportunity, through you, sir,
 13 and through you, madam, to address some observations,
 14 obviously that you would want to take account of, but to
 15 the witnesses who I might call corporate witnesses.
 16 That includes TMO for these purposes. So if
 17 I incorporate them in that way compendiously.

18 What is required at this stage, we feel, given how
 19 this has arisen, we would ask them respectfully, all of
 20 them -- and may I pause. We don't at the moment know
 21 exactly how many there are, and I'm not asking for
 22 an answer now. Perhaps Mr Millett at a later point
 23 today will be in a position to indicate how many have
 24 jumped on this bandwagon. We had a list provided
 25 before, but we suspect that the list is much greater,

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1 and perhaps a majority of corporates, other than the
 2 ones who are disassociating themselves from this.
 3 But the remarks that I now wish to make are
 4 addressed to them, that is the corporates who are making
 5 this application, by which I mean the individuals.
 6 Because Mr Laidlaw -- and it is an issue that's been
 7 pointed out by others -- when he spoke here, it's not
 8 entirely clear what his locus was, because he is
 9 representing a company, and the undertaking will not
 10 apply to them but it applies to individuals, and we
 11 would ask that you take into account that the
 12 individuals who want this ought to be making this
 13 application themselves, individually. I will come to
 14 the reasons why they should be doing it when I indicate,
 15 in summary form, the basis for the objection, which is
 16 set out, so you know the paragraph, at paragraph 8 in
 17 our submissions onwards, there are objections set out.
 18 The message we would wish to convey to those
 19 witnesses who wish to seek this or ask you to ask
 20 the Attorney General for an undertaking is this: it's
 21 barely a week ago that their representatives, of the
 22 witnesses we understand are now claiming the undertaking
 23 or the grant of an undertaking, only a week ago they
 24 were standing here, commiserating with the families, one
 25 after another, indicating how they sympathised with the

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1 agony and the tragedy and the horror of what they have
2 been through, and at the same time saying of course they
3 are entitled to know answers to questions and the truth.

4 Of course, what we didn't know at that stage, and
5 the families didn't know at that stage, was underneath
6 all of this was an intention to tell the truth on their
7 terms. In other words, "Yes, you can hear the truth,
8 but not from us, unless what we say is not used to
9 prosecute us individually or hold us accountable
10 individually".

11 We say, therefore, as anticipated by some of the
12 speakers, that the families strongly object to that
13 position adopted, which was basically saying one thing
14 but doing another, promising one thing but actually not
15 doing it, and only setting parameters within which the
16 truth shall be sought at this Inquiry.

17 So we would say, the families say, to them directly
18 today: would they kindly take a moment to reflect and
19 reconsider whether they really want to put the families
20 through more anguish, more agony, through the months
21 that come in Phase 2, either because they don't want to
22 answer questions affecting themselves and their own
23 culpability, which of course is paramount here,
24 accountability, and whether they really want to do that
25 or only speak provided the words they speak escape

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1 accountability.

2 There will be time -- I'm not suggesting a delay of
3 any substance, but possibly today, I don't know how many
4 of the core participants corporates -- and I call them
5 corporates, but I mean the individuals -- are here
6 today, but no doubt this message can be conveyed through
7 their representatives -- for them to seriously consider
8 their position, and it can be considered against
9 a backcloth which is dramatic. The backcloth that's
10 dramatic is Phase 1.

11 Phase 1 was undertaken, as you know, without
12 witnesses refusing to answer questions, without
13 witnesses saying, "Well, I'll only answer if there is
14 an undertaking". So it would be a gross unfairness,
15 putting it in the broadest sense, if in Phase 2, core
16 participants at the heart of responsibility act
17 irresponsibly. Because we say it is irresponsible, in
18 the context of this particular tragedy, characterised as
19 the worst in terms of a fire and loss of life since
20 World War II, if the families and the public and the
21 community at large are to be beholden to this kind of
22 corporate approach though this Inquiry.

23 Of course, in Phase 1, perhaps the finest example of
24 people who, in the end -- and I say "in the end" in the
25 sense of when it came to giving evidence, and I've no

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1 doubt before that as well -- were members of the
2 Fire Brigade, who went into, as it were, the entrails,
3 to clear up and prevent the loss of life if they could,
4 of the actions of the people who are now saying to you,
5 "Please write and ask for an undertaking for us". Why
6 do they deserve that? We say they do not deserve that
7 kind of treatment.

8 So we would ask you, sir, and you, madam, to bear
9 that in mind, and I understand representatives of the
10 firemen here today wish to add some observations and
11 weight to this as well.

12 So that is by way of introduction. We hope today we
13 will find out whether any of them even answer this
14 appeal to them, and if they don't, that speaks volumes.
15 And if they answer, no, they're not going to reconsider,
16 they're going to maintain their position, that also
17 speaks volumes for their community responsibility.

18 Yes, they have a right. No one is denying the
19 right. The question is: are you going to exercise that
20 right in the face of what has happened to these families
21 and in the face of what we have called in our
22 submissions the duty of candour? I don't explore that
23 any further; it is explored further in the submissions.
24 There is a duty of candour that they ought to have
25 regard to at this poignant moment.

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1 Sir, I pass from that to just indicate factors why
2 we say this application is totally without merit. We
3 say that, and I'm going to characterise it generally, as
4 it is in the submissions, as a disingenuous application.
5 One is careful about using such words unless one has
6 a very clear basis upon which to say it. We say there
7 is a very clear basis in this instance to say that, that
8 it's disingenuous.

9 Just for a moment, one needs to step back and assess
10 the magnitude of what's happened.

11 First of all, all these witnesses knew from the
12 moment of the fire that there would be a robust -- as it
13 has been -- and thorough inquiry into what happened,
14 and, of course, they must have recognised right then, on
15 the day of the fire, that somebody was going to ask
16 questions at some point. It can't have taken long for
17 it to sink in, because the police themselves announced
18 in July 2017 that they were already investigating
19 notionally those offences that relate to corporate
20 manslaughter, as an example. So they must have known
21 this train was already coming down the line.

22 But it gets far worse than that, in terms of what
23 they must have known and what they have sat on until the
24 doors of this court, because after that, you published
25 the terms of reference in the summer of 2017. If they

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1 really hadn't got the point, they must have got it then.
 2 However, just for a moment, in case they're a bit
 3 slow off the mark, later in 2017, of course, the Inquiry
 4 began its initial hearings, and your counsel, towards
 5 the end of that year, made very clear how it was all
 6 going to be managed, how it was all going to be split,
 7 what the issues were. They were spelt out in large
 8 print.

9 So they, the corporate individuals who are now
 10 claiming that they don't wish to answer without the
 11 undertaking, must have known then. And of course at the
 12 same time as that, throughout 2018, there was a police
 13 investigation, we know that, an active one, looking at
 14 a broad range, no doubt well beyond the corporate
 15 manslaughter issue.

16 So they knew questions were going to be asked and
 17 were being asked at that point, and what is particularly
 18 interesting -- and it may be conceded if it's my fault,
 19 it's my fault, but I don't think many of us were aware
 20 until you mentioned it yourself at the end of last week,
 21 not only were they aware that this was coming up and
 22 should have been sorted in that sense right at the
 23 beginning, instead of, as it were, lulling people into
 24 a false sense of security, TMO 18 months ago -- maybe
 25 16, I'm not sure of the date when they did it -- there

1 was some communication between the Inquiry and the TMO,
 2 who were invited to make representations, apparently.

3 Now, what's happened is, on the back of all that --
 4 in other words, they knowing full well that
 5 responsibility and the chain of responsibility was going
 6 to be one of the many themes of Phase 2 -- what do they
 7 do? What do these corporates -- and this is important
 8 in terms of: should I write to the Attorney General?
 9 Should the Attorney General grant these people
 10 an undertaking? I think not.

11 Because what they do is they belie the true
 12 situation that they're adopting. Their true situation
 13 is the one that was announced at the doors of the court,
 14 namely, "We don't answer unless". They do the opposite.
 15 And this is extremely important in terms of weighing up
 16 whether an undertaking is going to mean anything. What
 17 they do is they let everybody believe that they're not
 18 going to ask for it, because I'm perfectly certain --
 19 and we are assured in our own approach to this -- that
 20 had you thought for one moment that any of them really
 21 did want that, you would have taken the initiative. You
 22 would have asked, as you did of TMO, who then remained
 23 silent as far as I'm aware, for representations so the
 24 matter could be sorted out long ago, so we did not have
 25 this enforced delay.

1 But, no, not only do they provide openings, do they
 2 provide position statements, all of these are, as it
 3 were -- and I'm going to put it as high as this -- they
 4 are pretending that they want a full and open inquiry in
 5 which they will co-operate.

6 I'm just going to read one paragraph from our
 7 submissions, taken from the position statement, which is
 8 included. It's paragraph 20, and it relates to TMO.
 9 This is echoed by the position statements of others, so
 10 I'm only going to read one, because they're all very,
 11 very similar in this, but it sees the extent to which
 12 there has been this attempt, as it were, we say to
 13 derail this inquiry, because if it had been serious,
 14 this would have been ironed out months ago.

15 This comes from the position statement:
 16 "TMO welcomes the public inquiry and is fully
 17 supportive of its objective to obtain clear, reliable
 18 evidence, and to learn all possible safety lessons so as
 19 to minimise the chance that such a tragedy will ever be
 20 repeated. TMO is committed to providing full and frank
 21 evidence to the Inquiry in an open and transparent way.
 22 It has offered to the Inquiry all of its documentation
 23 without reservation or exception. This documentation
 24 was captured within four days of the fire occurring and
 25 was locked down and fully captured by independent IT

1 specialists. A copy in both its raw state and processed
 2 state, making it fully searchable, was provided to the
 3 police and offered to the Inquiry. All TMO staff
 4 employed at the time of the fire and those who are
 5 former staff have fully committed themselves to
 6 providing whatever evidence the Inquiry seeks from them,
 7 and do so in an open and transparent way."

8 Now, that sentiment is reflected in many of the
 9 other position statements.

10 We say to be, as it were, lulling readers and
 11 recipients of these position statements into the false
 12 sense of security that there isn't going to be
 13 an approach -- they're all going to come and do what the
 14 firemen did, then it's hardly surprising that when it's
 15 announced -- actually, funnily enough, not in most of
 16 the openings; it only started to emerge in the openings
 17 when TMO, interestingly -- it having then been
 18 communicated to the families that they had a right to
 19 warn their witnesses and so on. Other than that, not
 20 a hint of it up until that point.

21 We say, we have called them in the submission the
 22 pledges that were made over this period of time when
 23 they knew full well what was coming are, rather like the
 24 sentiments they expressed to the families about sympathy
 25 and needing answers, hollow, meaningless.

1 Which then leads me to a further point on the back
 2 of it. Even if -- and I appreciate, and we all
 3 appreciate, the gift of an undertaking is not within
 4 you, sir, or you, madam, but goes to the Attorney
 5 General -- you were to write and one were granted, think
 6 for a moment: are we to trust that these very same
 7 people, with this blanket undertaking, will come here
 8 and tell the unvarnished truth? I doubt it. In fact,
 9 I'm going to go one stage further and say were it to be
 10 granted, given the climate of denial and the
 11 buck-passing which we have already seen over the first
 12 days last week, the granting of an undertaking in this
 13 case will be tantamount, I fear, to a licence to lie.
 14 SIR MARTIN MOORE-BICK: Well, Mr Mansfield, that might be
 15 going a bit far, mightn't it? Because the undertaking
 16 that's been canvassed would not extend to giving false
 17 evidence to the Inquiry.
 18 MR MANSFIELD: No, it doesn't.
 19 SIR MARTIN MOORE-BICK: So if that were established,
 20 a prosecution for that could follow.
 21 MR MANSFIELD: I accept that. But the problem is, the
 22 establishment of the lies is really an offshoot of this
 23 Inquiry. Plainly, if you are in a position to prove
 24 that they told lies, yes, they can be prosecuted. But
 25 that's in a sense what's already in the pipeline because

1 of what they have put in statements.
 2 May I come to that straight away. What is
 3 interesting is -- and this is why the status of the
 4 observations made last week by Mr Laidlaw is again --
 5 one has to look at the locus here. In fact, the
 6 threshold -- we call it that in the submissions -- has
 7 not been crossed, because the statements that have been
 8 taken on behalf of the individuals and by the
 9 individuals, according to the openings and according to
 10 the statements, are truthful, and, further than that,
 11 they are non-incriminatory, which of course is another
 12 reason why no one has thought they were going to come
 13 here and say, "Oh, we're worried about incriminating
 14 ourselves".
 15 So the position is, at this moment, somebody is
 16 sitting on a whole load of truth which has not been
 17 disclosed. Who knows what it is. We certainly
 18 obviously have an idea of what it is, but we don't know.
 19 They know what the truth is. But not a single shred of
 20 evidence in Mr Laidlaw's submissions suggests that they
 21 have crossed the threshold of indicating that they might
 22 be incriminated.
 23 Just indicating to you there is a harvest of
 24 offences here -- which there are, of course, a number of
 25 offences, right through to health and safety -- that's

1 not the point. Of course, people are at risk of those
 2 offences if in any way they're connected with the
 3 construction design and all the other issues you are
 4 looking at. However, that's not enough to just -- we
 5 have put it as merely assert that there is a risk; you
 6 have to be able to provide reasonable grounds.
 7 Therefore, we say, in relation to this, if it were
 8 not granted, we say the proper procedure here should
 9 be -- which is why we urge you not to ask for it, the
 10 undertaking -- that each individual witness comes here
 11 and is faced with what I have suggested in opening is
 12 a conscientious decision about what the honourable thing
 13 to do is at that point.
 14 Now, if they decide the honourable thing is they
 15 don't wish to answer questions because immunity -- I'm
 16 sorry, I won't use that word, it's a bit lax -- there
 17 has been an undertaking they won't be prosecuted on what
 18 they say about themselves, at that point they would have
 19 to justify to you, sir, and you, madam, and provide
 20 reasonable grounds -- not all the detail, but exactly
 21 what they're worried about; in other words, what's the
 22 area in which they have material which may incriminate
 23 them? That's the normal way in which it's done.
 24 And not all inquiries have had undertakings. One
 25 would think from Mr Laidlaw's submissions they all have.

1 But not all have, and we have put an example of one
 2 where the Attorney refused to give an undertaking and
 3 the distinction with that.
 4 So we say it can be managed, and we say they must
 5 come here and justify it in front of you and in front of
 6 the families and in front of the public, so we know what
 7 it is and who it is who is trying to, as it were, hide
 8 behind this blanket right, which we admit exists within
 9 the statute.
 10 There is another caveat to this which is of
 11 interest. At that point that they're having to justify,
 12 you would be entitled -- and, madam, you as well,
 13 obviously -- if you wanted to, through counsel, to give
 14 the witness a warning about not answering questions that
 15 are relevant. The warning is very common in the
 16 criminal arena, and that is: if you don't answer
 17 questions, your silence may give rise to an adverse
 18 inference. That might just encourage a different
 19 approach.
 20 So this whole question of -- and it's really
 21 a threat -- "The smooth running of this Inquiry can only
 22 be effected and implemented by us being allowed to say
 23 what we want without any comeback to us individually",
 24 that should be cast to one side.
 25 So one gets to this position, we say, here -- and we

1 say it's abhorrent to the interests of justice -- that
2 those who are potential perpetrators of this inferno,
3 who have caused the loss of life, injury -- which is
4 often in fact overlooked -- and the loss of homes, then
5 and continuing now and well into the future, can those
6 potential perpetrators come here and essentially dictate
7 the terms upon which they will provide their assistance?

8 We say that that would be abhorrent in the public
9 interest for them to do so, and we would ask that no
10 more insult to the families upon the injury already
11 incurred should now occur by writing to the Attorney.

12 So, sir, we say at this point: enough is enough. We
13 are aware that others support this particular approach
14 to this problem.

15 May I, just before I finish, just mention one other
16 matter. It's unrelated, but in a way may have, in the
17 end, a relationship.

18 I stood here before to ask if it's possible for you
19 to lend your weight to a request for a replacement panel
20 member. I say again, it's quite shocking. A number of
21 organisations, including my own solicitors, have
22 approached the Cabinet Office time and again on a daily
23 basis, and they haven't even had the courtesy to
24 indicate that one is being sought or not sought or what
25 the position is. We say that's intolerable as well.

17

1 What else do the families, as it were, have to put up
2 with? We say it's about time that the Cabinet Office
3 faced up and said what they're doing or not doing, and
4 we would ask for your assistance in that matter as well.

5 Sir, those are my submissions.

6 SIR MARTIN MOORE-BICK: Well, that's very helpful.

7 Thank you, Mr Mansfield.

8 Could you just help me on one question.

9 MR MANSFIELD: Yes.

10 SIR MARTIN MOORE-BICK: My own reading of materials and so
11 on suggests that, at the end of the day, the question
12 that we have to decide is whether the Inquiry can
13 properly fulfil its terms of reference if a significant
14 number of witnesses claim privilege against
15 self-incrimination and, on that ground, don't answer
16 questions.

17 Would you accept that that is the question that
18 ultimately we have to decide?

19 MR MANSFIELD: Yes.

20 SIR MARTIN MOORE-BICK: Right.

21 MR MANSFIELD: I do accept that, but I could answer the
22 question to some extent that I think obviously, put in
23 bland terms, that is the question we would accept is at
24 the core of it, and it is the duty you have to have
25 a full inquiry and a thorough inquiry, but the point we

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1 would make with regard to that question is: it can't
2 actually be fully answered until somebody's crossed the
3 threshold. So the threshold question comes first. And
4 at the moment, nobody's crossed it. Therefore, we would
5 say it's not a situation in which you are not going to
6 reach the --

7 SIR MARTIN MOORE-BICK: I think what you are saying is that
8 we should wait and see.

9 MR MANSFIELD: Yes.

10 SIR MARTIN MOORE-BICK: But there will come a point, won't
11 there, where we shall either find that we are completely
12 bogged down with people claiming privilege as each
13 question is asked, because it has to be claimed in
14 relation to every question as it's asked, and the
15 position will become clear at least in relation to the
16 particular witness, and we might then move on and see
17 what the next one says. But there will come a point,
18 I suppose, when it's fairly clear.

19 MR MANSFIELD: We are hoping that conscience will enter the
20 arena here. Can I just cite -- it's in the
21 submissions -- in the case of Grainger, where
22 the Attorney refused an undertaking, in the end the
23 witnesses turned up and answered questions. And we
24 think, actually, that's what will happen here.

25 SIR MARTIN MOORE-BICK: You raised the possibility that one

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1 might draw adverse inferences.

2 MR MANSFIELD: Yes.

3 SIR MARTIN MOORE-BICK: That is commonly done in adversarial
4 proceedings because the parties are seeking to assert
5 a case --

6 MR MANSFIELD: Yes.

7 SIR MARTIN MOORE-BICK: -- and it may enable you to reach
8 a conclusion based on other evidence. But we are not in
9 that situation, are we? The Inquiry's function is to
10 find out in as much detail as it can exactly what
11 happened, and being left with inferences that can be
12 drawn from other material but not getting the answers
13 from the particular person concerned is not entirely
14 satisfactory, is it?

15 MR MANSFIELD: It's not satisfactory in one sense, but there
16 is nothing to preclude it. Furthermore, in this case,
17 obviously, there is going to be other material from
18 which inferences can be drawn, and if they point towards
19 a particular witness who is refusing to answer
20 questions, then although it's not adversarial, the
21 question is whether that witness is withholding material
22 that would assist, and certain inferences can be drawn
23 from that.

24 We would say it's a very important exercise of
25 a discretion, even though not adversarial, because if

20

1 you are to fulfil the function of, as it were, seeking
2 the truth in a wholehearted way -- otherwise it's going
3 to lead to situations in which there will be
4 a carte blanche, and that's almost what's being asked
5 for here. Anybody who has any connection with these
6 companies, pretty well, because there is a risk of
7 an offence at the end of it, well, then we have
8 an undertaking.

9 Well, that, if anything, is thwarting, because if it
10 was going to lead in a situation other than this one
11 with the witnesses coming out with the truth, then that
12 might matter. But in fact what we are also saying is
13 that in this particular case, given the behaviour of the
14 corporates and their witnesses to date, one can have
15 absolutely no faith that the undertaking will provide
16 you with the material that you want, and therefore the
17 only way in fact you might get it is through an adverse
18 inference.

19 SIR MARTIN MOORE-BICK: All right. Well, thank you very
20 much. A lot to think about.

21 MR MANSFIELD: Thank you.

22 SIR MARTIN MOORE-BICK: Now, I understand, Ms Barwise, that
23 you would like to make some submissions on this,
24 although I think we have both got your written
25 submissions.

21

1 Submissions on behalf of BSRs Team 1 by MS BARWISE

2 MS BARWISE: Yes. With your permission, sir and madam,
3 I would like to do two things: first, explain our
4 position by way of very short summary, and, secondly,
5 make three further short points that our clients are
6 keen that you should hear.

7 SIR MARTIN MOORE-BICK: Yes.

8 MS BARWISE: You have our written submissions to the effect
9 that our clients wish to adopt a neutral position and
10 leave to you the question of whether to seek
11 undertakings from the Attorney General. The reason we
12 adopt a neutral stance is that we cannot, in the short
13 time available, obtain complete instructions from all
14 clients, and those with whom we did manage to speak had
15 understandably different and reasonably held views.

16 One response all our clients, without exception, had
17 to this application was that of utter outrage at its
18 timing and, frankly, the fact of it at all. Our clients
19 find themselves placed in a wholly impossible position
20 by the application, because they cannot know the nature
21 of the evidence which will emerge in this Inquiry, and
22 it is not possible to know how these undertakings, if
23 given, may affect subsequent prosecutions.

24 We know that you are well aware of our clients'
25 three-fold desires, which are, first, transparency and

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1 truth in relation to the matters within your terms of
2 reference; secondly, meaningful change for the purpose
3 of prevention; thirdly, accountability in the form of
4 clear attribution of responsibility, but ultimately, and
5 beyond this Inquiry, prosecutions.

6 As to future prosecutions and the risk to them
7 imposed by the grant of undertakings, we recognise that
8 these will not be your primary concern. Those questions
9 are for the Attorney General and the DPP.

10 Our clients are very keen that we should make three
11 points, but none of these points should be understood as
12 arguing either for or against the application, upon
13 which we wish to remain neutral.

14 First, our clients are profoundly upset and angry
15 that the application is being made at all in
16 circumstances where hitherto these participants have all
17 claimed to be being co-operative and therefore should
18 not at this very late stage be seeking to protect
19 themselves. The very fact of their application perhaps
20 explains why the position and witness statements say so
21 very little and do not truly engage with the real issues
22 with which this Inquiry is concerned.

23 The other circumstance which the BSR feel strongly
24 about is the fact that the firefighters were just as
25 much at risk of prosecution under the Health and Safety

23

1 at Work Act, and yet freely gave their evidence without
2 seeking undertakings.

3 Second, as we said to you in opening, the timing of
4 this application appears disingenuous and an attempt at
5 sabotage. Nothing Mr Laidlaw QC said in making the
6 application changes our submission.

7 We offer two examples. Harley appears to have been
8 in a position to understand its risk of
9 self-incrimination much earlier than was suggested by
10 Mr Laidlaw. Mr Laidlaw was listed as Harley's counsel
11 in the registered legal representative list in Phase 1.
12 There was no suggestion from Mr Laidlaw that counsel did
13 not assist Harley throughout Phase 1.

14 On the contrary, Mr Laidlaw suggested that all
15 Harley's counsel stopped work due to funding constraints
16 only in summer last year. That was transcript
17 {Day4/124:24-25}. Harley's legal representatives had
18 submitted a position statement explaining Harley's role
19 in February 2018, and had the first Phase 1 report of
20 Dr Lane as from mid-April 2018. Dr Lane's report
21 indicated the lack of cavity barriers around windows and
22 the extent of combustible material in the façade.
23 Harley should therefore have known, from mid-2018
24 onwards at latest, once it had digested Dr Lane's
25 report, that it was exposed to the risk of prosecution

24

1 given the terrible outcome of the fire .
 2 The points made by Mr Laidlaw that he did not see
 3 the Hyett report until December, and that, prior to
 4 receipt of it , he considered the risk of
 5 self -incrimination to be low, seems at odds with the
 6 knowledge Harley and its lawyers must be taken to have
 7 had in Phase 1.

8 As you, sir , intimated during the making of the
 9 application on Friday, TMO asked the Inquiry to consider
 10 an application for an undertaking some 15 months ago
 11 but, on being asked by the Inquiry to provide detail ,
 12 simply dropped the issue.

13 Given that TMO legal representatives in Phase 1
 14 included Mr James Ageros QC, one of the authors of the
 15 textbook Health and Safety Enforcement which was cited
 16 by Mr Laidlaw, it may be supposed that Mr Ageros would
 17 have been alive to the likelihood of prosecution for
 18 health and safety offences, and, on the face of it , it
 19 is likely that he would have advised his clients
 20 accordingly .

21 TMO has not apologised for its failure to engage
 22 with the Inquiry on the subject of undertakings, and
 23 Studio E, Rydon and Osborne Berry have not even sought
 24 to assert that they were not in a position to appreciate
 25 their risk of self -incrimination until now. It beggars

1 belief that they were not.
 2 In short, the timing of this application is highly
 3 disingenuous and bears all the hallmarks of sabotage of
 4 this Inquiry.

5 Third, and finally , if you are minded to accede to
 6 the application , then we ask you to urge upon
 7 the Attorney General the extreme urgency within which
 8 any decision should be made. We wish to repeat my
 9 remarks in opening that the current regulatory system
 10 represents a dangerous system which very likely puts the
 11 government in breach of Article 2 of the Human Rights
 12 Act and requires very urgent recommendations to be made.
 13 There is therefore no time to lose in the process of
 14 deciding whether to grant the undertakings.

15 I'm grateful, sir , madam. Those are my submissions.

16 SIR MARTIN MOORE-BICK: Thank you very much.

17 MS BARWISE: Thank you.

18 SIR MARTIN MOORE-BICK: Now, the Metropolitan Police is
 19 a core participant , and I think, Mr Warnock, you would
 20 like to say something on their behalf; is that right?

21 Submissions on behalf of the Metropolitan Police Service
 22 by MR WARNOCK

23 MR WARNOCK: Sir, madam, if I could just explain
 24 the Metropolitan Police 's position .

25 Those instructing me wrote a letter to the solicitor

1 to the Inquiry on Friday, and if I could perhaps just
 2 read that out.

3 The Commissioner of Police of the Metropolis has
 4 considered the application made for undertakings from
 5 the Attorney General on behalf of a number of core
 6 participants and Module 1 witnesses.

7 Although the commissioner is a core participant in
 8 the Inquiry, the Metropolitan Police Service have
 9 a separate and independent role to conduct the criminal
 10 investigation into the fire at Grenfell Tower. For that
 11 reason, it is not appropriate for the commissioner to
 12 make any representations to you, Mr Chairman, or you,
 13 madam, in response to the application . It is important
 14 that the commissioner maintains the independence and
 15 integrity of the criminal investigation and does not do
 16 anything that could be perceived to influence the way in
 17 which evidence could or could not be used as part of the
 18 criminal investigation in due course.

19 Therefore, the commissioner takes a neutral stance
 20 on the application .

21 SIR MARTIN MOORE-BICK: Good. Thank you very much.

22 Now, Mr Maxwell-Scott, I have received something in
 23 writing from you this morning, but it came very late ,
 24 and I think you were told by the Solicitor to the
 25 Inquiry that there wasn't time to circulate it . But we

1 are willing to hear from you if you would like to come
 2 and address us now.

3 Submissions on behalf of Royal Borough of Kensington and
 4 Chelsea by MR MAXWELL-SCOTT

5 MR MAXWELL-SCOTT: Sir, madam, I'm grateful for this
 6 opportunity to state publicly what RBKC's position is on
 7 this application .

8 RBKC was not one of the signatories to the letter to
 9 the Inquiry dated 27 January, and was not one of the
 10 parties who made the application dated 28 January.

11 RBKC is a separate legal entity to the TMO, and does
 12 not share its position on the application .

13 RBKC did not and does not support the application .

14 RBKC has adopted the Charter for Families Bereaved
 15 through Public Tragedy, and made a commitment to
 16 candour. In its oral opening statement for Module 1, it
 17 admitted certain failings in respect of Module 1 issues,
 18 and stated that in our closing submissions for Modules
 19 1, 2 and 3, we will set out in detail and with candour
 20 the council's position on all issues relevant to it that
 21 have arisen in those modules.

22 RBKC's position is that it would encourage all
 23 witnesses called to give oral evidence to the Inquiry to
 24 answer all of the Inquiry's questions and to do so
 25 truthfully . That is what it will be encouraging all

1 RBKC witnesses in Phase 2 -- ie current councillors ,
2 former councillors , current employees, and former
3 employees -- to do.

4 Sir, we recognise that it is difficult to gauge what
5 the practical effect on the Inquiry's proceedings would
6 be if there were no undertaking from the Attorney
7 General, but we encourage you to guard against
8 overestimating the possible effect .

9 RBKC considers that the views of the BSRs, who are
10 at the centre of this Inquiry, should be of paramount
11 importance when deciding what decision to make in
12 respect of this application .

13 Thank you.

14 SIR MARTIN MOORE-BICK: Right. Thank you very much.

15 Mr Seaward, you also circulated something, at least
16 to the Inquiry, this morning. I regret to say that
17 I haven't had a chance to read it , it came so late , but
18 you would like to address us briefly as well, would you?

19 Submissions on behalf of the Fire Brigades Union
20 by MR SEAWARD

21 MR SEAWARD: Yes, I would, thank you, sir .

22 On behalf of the Fire Brigades Union, it came so
23 late, sir -- I apologise for that -- because we were
24 waiting for instructions , which in turn we were trying
25 to find out what the BSRs' position was.

29

1 In the event, the Fire Brigades Union opposes this
2 application . The FBU supports a full and open inquiry,
3 and supports the BSRs in their quest for the truth about
4 what happened. They're at the centre of this Inquiry
5 and the FBU will support their response to this
6 application .

7 Taking a broad view, one team opposes the
8 application , the other team is neutral, and it seems to
9 us that one plus nought equals one. So, on balance, the
10 BSRs oppose the application .

11 We certainly oppose the application . The FBU
12 contends that Harley Façades and those joining them
13 should be left to make their own application to
14 the Attorney General if they choose to do so. In
15 considering any such application , the Attorney General
16 will take into account the refusal of this application
17 and the reasons given by the Chairman therefor.

18 Brief reasons for our opposition. I won't go
19 through it all ; it is set out and I'm sure you will have
20 an opportunity to read it in the fullness of time.

21 The FBU is concerned that if this application is
22 granted there will be seen to be, particularly by our
23 members who gave evidence, different rules for witnesses
24 in Phase 1 and Phase 2, and indeed different rules in
25 Phase 2 between those witnesses who are covered by

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1 an undertaking and those witnesses who are not.

2 SIR MARTIN MOORE-BICK: Well, the probability, surely, is
3 that if the Attorney were to grant an undertaking, it
4 would be in terms probably broad enough to cover any
5 witness, wouldn't it?

6 MR SEAWARD: Well, I don't know, I haven't had experience of
7 an application like this being made without naming the
8 persons for whom the application is made. We have
9 an application by Mr Laidlaw QC, instructed by
10 Harley Façades Limited, and he does not appear to have
11 instructions from the individual witnesses concerned.
12 I mean, on the face of it, it looks like the application
13 was made without instructions. One wonders what his
14 locus is . It's not enough just to stand up and make
15 an application on behalf of witnesses -- it can't be
16 assumed that all of the witnesses for the corporate
17 bodies or the other CPs involved in Phase 2 actually
18 want this undertaking.

19 SIR MARTIN MOORE-BICK: Well, we have treated it as
20 an application , but I think in reality it's a problem,
21 so to speak, for the panel itself , isn't it?
22 Mr Mansfield accepts that the question for us is whether
23 we can fulfil the terms of reference if witnesses claim
24 privilege against self-incrimination .

25 MR SEAWARD: Indeed.

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1 SIR MARTIN MOORE-BICK: That raises obviously a difficult
2 question, which we will have to give some careful
3 thought to, as to whether the likelihood of that
4 occurring is sufficiently great to approach the Attorney
5 for an undertaking.

6 In a sense, it's a problem for the panel more than
7 an application on behalf of any particular person.

8 MR SEAWARD: I would like to echo, if I may, what
9 Mr Maxwell-Scott said about overestimating the effect of
10 it .

11 Can I, going forward, outline a few thoughts that
12 the FBU have had on those practicalities .

13 If the Inquiry were to proceed as planned, then the
14 witnesses can claim to exercise privilege against
15 self-incrimination in response to questions if they
16 choose to do so. The panel can draw inferences from the
17 evidence viewed as a whole, including the refusal to
18 answer any particular questions. There is no need to
19 give a warning against self-incrimination for witnesses
20 who are represented by lawyers, who already are or soon
21 will be fully aware of the provisions of section 14 of
22 the Civil Evidence Act and sections 17 and 21 of the
23 Inquiries Act. A warning can be given to those who are
24 not separately represented.

25 Moving on to the difficulties , there will be

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1 occasions when the panel will have to determine whether
2 or not a witness should be required to answer a question
3 or should be entitled to claim privilege. It's likely
4 after a few such decisions that the principles
5 underlying your decision will become clear. Guidelines
6 will become obvious to everybody in this room, and the
7 process will not cause undue delay. It's likely that it
8 will cause initial delay because there will be
9 an application, there will be submissions, you will have
10 a difficult job in going away and deciding it. But you
11 will make your decision, you'll give reasons, and
12 everybody will know where the parameters lie.

13 Picking up on a point you made to Mr Mansfield about
14 these proceedings not being adversarial but being
15 investigative, that is of course right, but Phase 2 does
16 give the corporate witnesses an opportunity to explain
17 any misunderstandings that they may allege
18 Stephanie Barwise QC or Adrian Williamson QC have made
19 in their opening submissions, those careful submissions,
20 crafted on the back of the evidence disclosed to all
21 core participants, and some submissions already made on
22 their behalf.

23 So to take a broad view of it, Mr Chairman, there is
24 a lot of evidence already before this Inquiry. As my
25 history teacher used to tell me, you can write a much

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1 better essay on ten clear facts than you can on 100
2 contradictory ones.

3 But certainly the panel have enough evidence to
4 decide the Phase 2 issues on the evidence already
5 disclosed. What the Inquiry is offering these witnesses
6 in Phase 2 is an opportunity to say something that they
7 want to say that hasn't already been said. Some of them
8 may take that opportunity. The FBU's position is it's
9 up to them. If they choose not to, then the FBU thinks
10 those individual witnesses should say, "I claim
11 privilege". They shouldn't be allowed to hide under
12 a blanket undertaking.

13 Sir, I think you have got the point already, I'm
14 sure, Ms Barwise and Mr Mansfield have already said it,
15 but can I just explain that the firefighters and control
16 room staff in Phase 1 faced the same dilemma, but they
17 chose to assist the Inquiry with full and frank
18 evidence, without any such assurance. They found
19 themselves at the epicentre of this disaster on 14 June
20 2017. They tried to help then and they tried to help
21 this Inquiry ever since. So should the witnesses
22 involved in the refurbishment.

23 If you decide, sir, that it would be too disruptive
24 not to give the undertaking, if that's your conclusion,
25 then the FBU would contend that the scope of any

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1 undertaking should be drawn as tightly as possible and
2 qualified as set out in our submissions. There is
3 a qualification that essentially is designed to ensure
4 that the evidence given by one witness may be used to
5 further a prosecution of another person, and that's set
6 out in the written submissions.

7 Unless I can help you any further, sir.

8 SIR MARTIN MOORE-BICK: Thank you very much, Mr Seaward.

9 MR SEAWARD: Thank you.

10 SIR MARTIN MOORE-BICK: Now, in a moment I'm going to ask
11 Mr Laidlaw --

12 MR WALSH: Sir, I do apologise.

13 SIR MARTIN MOORE-BICK: Oh, no, don't worry, because I was
14 about to say, before I ask Mr Laidlaw, whether there is
15 anyone else who would like to be heard for or against
16 the application, and I take it you would?

17 MR WALSH: I just had something -- it will only take
18 a moment.

19 SIR MARTIN MOORE-BICK: Would you like to come up here and
20 say it, though. You are not on camera down there and
21 the watching public would like to know what it is.

22 Submissions on behalf of the London Fire Brigade by MR WALSH

23 MR WALSH: Sir, I can say it very quickly, but it is
24 important that I do this, because firefighters need to
25 understand what the position is.

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1 Can I say straight away that I make no submissions
2 on the application before you today, insofar as it is
3 an application, because of course it's a matter for
4 the Attorney General at the end of the day, but the LFB
5 doesn't support it.

6 I wish only to make this point on behalf of the
7 Brigade, so that firefighters are clear.

8 The LFB is a public body with a duty of candour,
9 which is reflected in the open manner in which so many
10 of its firefighters gave evidence in Phase 1, as public
11 servants, of course. That is because the Brigade's
12 primary aim is to keep Londoners safe, and to learn
13 lessons in the wider public interest. And the openness
14 the firefighters have demonstrated is the best way of
15 learning those lessons. That is how the London Fire
16 Brigade intends to conduct itself onwards into Phase 2.

17 SIR MARTIN MOORE-BICK: Thank you very much.

18 MR WALSH: Thank you very much, sir.

19 SIR MARTIN MOORE-BICK: Right, thank you.

20 Now, does anybody else wish to be heard for or
21 against the application?

22 Ms Studd, do you want to say something?

23 MS STUDD: Yes, please, very briefly.

24 SIR MARTIN MOORE-BICK: All right. Yes. Would you like to
25 come up here.

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1 Submissions on behalf of the Mayor of London by MS STUDD
 2 MS STUDD: Sorry, Mr Chairman, I'm late because I had to get
 3 instructions from City Hall this morning.
 4 SIR MARTIN MOORE-BICK: All right, don't worry.
 5 MS STUDD: It's very short, what the Mayor would like to
 6 say.
 7 First of all, he would like to endorse the bereaved,
 8 survivors and residents' outrage at the timing of this
 9 application, and asks that you, sir, note how
 10 a legitimate feeling of outrage and injustice is
 11 promoted by the late attempt of corporate core
 12 participants to obtain an undertaking, forcing the
 13 bereaved, survivors and residents to make decisions on
 14 such a difficult issue at such very short notice.
 15 The Mayor would also endorse the need for clarity as
 16 to who it is seeking such an undertaking from
 17 the Attorney General so that you and your panel members
 18 are clear about the parameters within which
 19 an individual is giving evidence. It's not clear from
 20 the application, such as it is, who is seeking the
 21 undertakings and would wish to exercise their privilege
 22 in circumstances when they give evidence.
 23 Ultimately, though, sir, of course it's a matter for
 24 you, together with your panel members, to decide how
 25 best to ensure that the issues relevant to this very

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1 important and wide-ranging Inquiry are best answered as
 2 fully as possible, so that your significant work can be
 3 fulfilled, and so that the interests of the bereaved,
 4 survivors and residents, and of Londoners more
 5 generally, can be properly protected by a full analysis
 6 of what went wrong on this night in June 2017.
 7 SIR MARTIN MOORE-BICK: Thank you very much.
 8 Does anyone else want to say anything at this stage?
 9 Otherwise I will invite Mr Laidlaw to come and respond
 10 to what he has heard. Finally I'm going to ask Counsel
 11 to the Inquiry to say something to wrap things up.
 12 I think no one else, Mr Laidlaw, so would you like
 13 to come up and respond to what you heard.
 14 Submissions on behalf of the applicants by MR LAIDLAW
 15 MR LAIDLAW: I'm not going to repeat submissions made on
 16 Thursday. We would suggest that your analysis of the
 17 difficult situation which confronts the Inquiry now
 18 should lead you to the following three conclusions.
 19 Firstly, that a parallel criminal investigation for
 20 offences of the broadness in terms of their ingredients
 21 that are presently under consideration by the police,
 22 means, as a matter of law, a warning as to the right not
 23 to self-incriminate when answering questions will have
 24 to be given to a great many of the witnesses.
 25 That, we would suggest, is an unavoidable legal

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1 reality which is imposed upon you, sir, and it will
 2 arise certainly in respect of the witnesses who work or
 3 worked for Harley, the company that I represent.
 4 With great respect to Mr Mansfield and his
 5 submissions on behalf of Team 2, he does not appear to
 6 have addressed the law as it's set out in the
 7 application or as I supplemented it on Thursday
 8 afternoon, and his submissions are effectively
 9 an invitation to ignore the law. That is not
 10 a disingenuous application for me to make or one which
 11 is without merit.
 12 As to the submissions in respect of Baha Mousa,
 13 I would suggest that they fall to be considered against
 14 these two points: (a) the investigation in that Inquiry
 15 preceded the public inquiry. In other words, they were
 16 over. Secondly, the nature of the undertaking drawn
 17 upon that sought in Baha Mousa was the product,
 18 of course, of a series of undertakings which had been
 19 given in previous public inquiries; it was not, as
 20 appeared to be suggested, the product of particular
 21 factors arising in Sir William Gage's inquiry.
 22 The second conclusion that we suggest you should be
 23 drawn to is this: because a number of the witnesses --
 24 and this applies to each of the Harley witnesses -- is
 25 unrepresented, the warning will have to be administered

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1 by you, Mr Chairman, assisted by your counsel team. It
 2 will require a constant appraisal and reappraisal of the
 3 particular circumstances, and it may well be, if you
 4 were persuaded of the approach that the BSR Team 2 argue
 5 for, that that warning should be taken, and there would
 6 need to be discussion about individual questions asked
 7 of each of the witnesses. That, we would suggest, would
 8 represent a significant interference with the smooth
 9 running of the Inquiry, whereas the solution that we
 10 suggest, namely the seeking of an undertaking, if
 11 granted, so obviously avoids that problem, and it's been
 12 used effectively, of course, at a number of previous
 13 inquiries.
 14 Thirdly, we would suggest that the conclusion you
 15 should be driven to is in fact that the best interests
 16 of the public inquiry, and therefore of the public
 17 interest, lie in the mechanism of the undertaking of the
 18 sort we invite you to consider. We would suggest
 19 respectfully that the neutrality of the BSR Group 1 no
 20 doubt in part reflects an appreciation of this. It is
 21 the undertaking which is most likely to lead to full and
 22 frank answers that the Inquiry, through its counsel,
 23 have called for.
 24 Can I just deal with one further point, which is the
 25 question of my status, my locus in this case.

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1 Mr Mansfield is quite right about my questionable
 2 locus. I conceded it immediately on Thursday afternoon.
 3 I am speaking up for but do not represent the Harley
 4 individuals. But are, on analysis, Mr Mansfield's and
 5 Mr Seaward's submissions that the application should be
 6 made on an individual basis sensible against these two
 7 realities : firstly , the Harley witnesses are and do not
 8 have representation; but secondly, and perhaps more
 9 importantly, what more is it that they could add to the
 10 argument, as has been set out now in writing and
 11 supplemented by the oral submissions? Again, we would
 12 suggest that this , as a solution or as some sort of
 13 compromise, would actually add further delay to these
 14 proceedings about which Mr Mansfield complains so
 15 bitterly .

16 Sir, those are my short submissions, unless I can
 17 assist you or your colleague further.
 18 SIR MARTIN MOORE-BICK: Well, I think there is one thing you
 19 might or might not perhaps be able to help us with, and
 20 that is this: the impression I had from what you said
 21 last week and from your written application, as we will
 22 call it, is that you had reason to think that, at least
 23 in the case of the Harley witnesses, and maybe others as
 24 well, there were grounds to think that they would claim
 25 privilege against self-incrimination.

1 Now, I know you are not instructed by them, and
 2 of course you are not instructed by employees or former
 3 employees of other companies, but is there anything you
 4 can tell us about that? Because the submission being
 5 made expressly by Mr Mansfield is: wait and see if they
 6 do it, which is one possible approach. It might be time
 7 consuming, it might be disruptive, but it's one possible
 8 approach.

9 MR LAIDLAW: Yes. As you observe, I don't represent these
 10 individuals. I can't commit them or pretend to be
 11 giving advice on their behalf. But my clear
 12 understanding is that they would want to be warned and
 13 they would take very seriously the warning which was
 14 given to them in light of the situation they confront,
 15 namely that they have either been interviewed or are due
 16 to be interviewed, and those interviews will continue
 17 for a broad range of offences right the way through your
 18 work.

19 SIR MARTIN MOORE-BICK: As far as the Harley witnesses are
 20 concerned -- with whom you may or may not have had
 21 anything to do, I just don't know about that -- do you
 22 happen to know whether anyone has discussed with them
 23 the range of offences which might be relevant to the
 24 question of taking privilege --

25 MR LAIDLAW: Yes, I do know that the range of offences have

1 been discussed by the criminal solicitor who represents
 2 them at the interviews which have taken place thus far.

3 SIR MARTIN MOORE-BICK: Right.
 4 Well, thank you very much, Mr Laidlaw.

5 MR LAIDLAW: Not at all, thank you.

6 SIR MARTIN MOORE-BICK: Mr Millett, I think I ought to give
 7 you an opportunity to say anything you feel I ought to
 8 hear or we ought to hear in relation to the application.

9 Submissions by COUNSEL TO THE INQUIRY

10 MR MILLETT: Yes, Mr Chairman.
 11 Mr Chairman, madam, first: timing.

12 I should set out our position on the timing of the
 13 application lest people think that the Inquiry counsel
 14 team are neutral about that. We do share the surprise
 15 and the dismay of many of the bereaved, survivors and
 16 residents about the timing of the request for the
 17 undertaking from the Attorney General.

18 When I rose to open Phase 2 last Monday,
 19 Mr Chairman, I had no inkling at all that you were going
 20 to be asked by the applicant witnesses and core
 21 participants to write to the Attorney General and ask
 22 for the undertaking now sought.

23 I had read, as we had all read, the written opening
 24 statements from Studio E, Harley, Rydon, Osborne Berry
 25 and the TMO. None of those statements contained any

1 suggestion that any witness from those organisations to
 2 be called to give oral evidence would refuse to answer
 3 any question on the grounds that the answer might
 4 incriminate them. All of them expressed in different
 5 terms and in different degrees a desire to assist
 6 the Inquiry. That was repeated in oral opening
 7 statements. I give you two examples.

8 Mr Popat QC for Studio E said in his oral opening
 9 statement -- {Day1/36:17-23} -- that it's the Inquiry's
 10 role to question the actions of everyone involved in the
 11 project to refurbish the tower, and:

12 "Studio E will do its best to answer the questions
 13 asked of it, and it wholly supports the need for
 14 a thorough and wide-ranging investigation."

15 Mr Laidlaw Queen's Counsel for Harley told you:
 16 "The Harley witnesses do not want to be accused of
 17 ducking the criticisms of aspects of their work which
 18 will fall to be considered in this part of the Inquiry."
 19 {Day1/94:9-12}.

20 Neither of those statements that I have just quoted
 21 even hinted that that would of course all be subject to
 22 your obtaining an Attorney General's undertaking,
 23 without which witnesses would all take the privilege
 24 against self-incrimination across a wide front.

25 The reason I say all this is because I would not

1 wish core participants , members of the public or the
2 families , the bereaved, survivors and residents , to
3 think that the Counsel to the Inquiry team was in any
4 way indifferent to the timing and the manner in which
5 this issue has raised .

6 The previous statements and positions taken by the
7 applicants and others is a factor which you must take
8 into account when reaching your decision, and I will
9 come back to it .

10 That takes me to the position of Counsel to the
11 Inquiry, and the position is that, with some regret,
12 perhaps, Counsel to the Inquiry considers that it is in
13 the public interest for you to seek the undertaking
14 sought.

15 There are three reasons why, from the point of view
16 of Counsel to the Inquiry, it is in the public interest
17 to do so.

18 First, without it, you will not get to the truth.
19 You are obliged by statute to investigate as fully as
20 possible the matters falling within the terms of
21 reference, and to do so in a way in which the public and
22 the BSRs in particular can see the questions, many of
23 which have been formulated and posed by them, put
24 publicly and answered by the witnesses publicly .

25 If the Inquiry's witnesses in any module take the

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1 privilege against self-incrimination across a wide range
2 of questions successfully , as may be thought to be
3 likely , given the range of offences and, as I can tell
4 you, the range of questions we have, that will frustrate
5 the exercise of public investigation and you will only
6 have a partial picture .

7 The Inquiry needs its witnesses to be able to tell
8 you the unvarnished truth, free of the threat of use of
9 their answers by prosecutors in furtherance of criminal
10 proceedings.

11 We disagree with Team 2's submission that
12 an Attorney General's undertaking is a blanket that
13 covers up the truth. That was paragraph 32 of their
14 written submissions. It is actually the removal of
15 a potential blanket, and a pretty big blanket, because,
16 otherwise, if witnesses successfully take the privilege ,
17 they blanket themselves from answering. Once the
18 privilege is removed by the undertaking, then you,
19 Mr Chairman, can compel an answer on pain of punishment.

20 The second reason: without the full facts found by
21 you, based on a complete exploration of the evidence
22 through the witnesses we would like to call , you would
23 not be able to make recommendations at all, let alone
24 recommendations for lasting and deep change.

25 A criminal trial will not establish the facts

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1 authoritatively so as to form a secure foundation for
2 recommendations. Indeed, the result of any criminal
3 trial against any witness would not be findings of fact
4 or a report of any kind, but quite simply a verdict , one
5 of guilt or one of acquittal , or where perhaps there is
6 a guilty plea, nothing more than a sentence.

7 Putting it simply, Mr Chairman, madam, the purpose
8 of criminal proceedings is punishment for the commission
9 of an offence. The purpose of this Inquiry is to find
10 out exactly what happened at Grenfell Tower, why it
11 happened, and who was responsible so that it never
12 happens again.

13 Fourthly, Mr Mansfield said this morning that the
14 words they speak will escape accountability , and that
15 was page 5 of this morning's transcript {Day5/5:25}.

16 The reasons why we disagree with that form a fourth
17 reason for why it is in the public interest to seek the
18 undertaking. This Inquiry is interested in the
19 accountability of witnesses and organisations. The
20 words they speak are answers to questions, and if they
21 speak with the benefit of the undertaking, they will not
22 escape accountability ; they will be accounting by giving
23 their account for their actions, their decisions, their
24 omissions and their approach. It will be for others to
25 decide whether they should be punished. You are

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1 prohibited by the Act from reaching any conclusion on
2 liability , civil or criminal.

3 But, as I said when opening Phase 2 to you last
4 week, accountability in the Inquiry follows from the
5 evidence and from the findings you make about that
6 evidence.

7 Finally, in terms of reasons in favour, it is only
8 fair to those who are the subject of criticism that they
9 are free to answer the criticisms levelled against them
10 by the Inquiry's experts as they say they would wish to.
11 Of course, they have a choice whether to answer or
12 whether to take the privilege against
13 self-incrimination. However, Mr Chairman, madam, that
14 is more a dilemma than a truly free choice. Since
15 the Inquiry is only interested in getting reliable and
16 complete answers from its witnesses, it is interested in
17 their being relieved from any dilemma so that they have
18 no reason to refuse to answer.

19 It is also, I should say, in your interests to
20 ensure that, if criticisms are to be made of anybody in
21 your report, then those who are criticised cannot later
22 say that they were unfairly prevented from answering
23 because you refused to seek to relieve them by means of
24 obtaining or seeking an undertaking from the Attorney
25 General.

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1 There is an additional point which I would wish to
2 make, which also arises in terms of practicality from
3 what Mr Mansfield said this morning. Although he said
4 that conscience in the end would triumph and witnesses
5 will in the end do the right thing -- that was the
6 burden of the point -- we are sceptical about that on
7 the material we have seen. It is in many senses too
8 much of a gamble to wait to see what happens and wait to
9 see whether or not the true extent of the taking of the
10 privilege against self-incrimination is as great as
11 Mr Laidlaw says it will be.

12 I simply say this: the conduct in the way in which
13 the application was made so far does not prompt any
14 degree of confidence that the conscience of these
15 witnesses will somehow triumph in the end.

16 Sir, that is why you, in our submission, need to
17 clear the way so that there is absolutely no impediment
18 at all for each and all of the witnesses that we seek
19 from going into that witness box and answering our
20 questions on pain of punishment if they don't.

21 So those are the reasons in favour.

22 For the reasons against, you should balance the
23 delay and the disruption to the timetable which would
24 result.

25 Now, Mr Chairman, delay has two facets.

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1 First, although it may not seem like it to the
2 bereaved, survivors and residents, for whom justice
3 cannot come soon enough, this Inquiry has proceeded at
4 speed and must continue to do so. That is because there
5 are major questions of public safety which our
6 investigations have revealed and which need to be
7 addressed with the utmost urgency. Any delay without
8 a very good reason is not just inconvenient, but
9 potentially dangerous.

10 Secondly, you have an obligation under section 17(3)
11 of the Inquiries Act 2005 in making any decision as to
12 the procedure or the conduct of this Inquiry to act with
13 fairness, with regard to the need to avoid any
14 unnecessary cost, whether to the public funds or to
15 witnesses or others. Fairness, of course, includes
16 ensuring that the legitimate expectations of other core
17 participants and witnesses about the procedure and the
18 timetable are reasonably met.

19 Now, Mr Chairman and madam, both of those
20 considerations involve asking the question what the
21 impact of the request to the Attorney General will
22 involve. It will certainly involve disruption and delay
23 to our timetable, without any certainty of when we might
24 get to the first witness.

25 So those are factors against.

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1 Third -- I come back to it -- the timing of the
2 application. While we, as I have said, have much
3 sympathy with the points made by Team 2 and share their
4 sense of dismay, if I can use a neutral or slightly less
5 colourful word, there is more to it, or may be said to
6 be more to it, than that.

7 There is the outline of an argument, not pressed
8 heavily by Mr Mansfield but nonetheless lurking there,
9 that the request has been made in bad faith and for
10 an improper purpose. But in the end, the answer to that
11 has to be this: even if you were to conclude that the
12 application has been made in bad faith and for
13 an improper purpose, the conduct of the applicants,
14 whether one likes it or not, does not operate of itself
15 to deprive the witnesses of their right, which is
16 enshrined in law, to the privilege against
17 self-incrimination.

18 So, Mr Chairman, when you balance the factors in
19 favour of seeking the undertaking with the factors
20 against doing so and the answers to those factors,
21 Counsel to the Inquiry's submission is that the scales
22 come down in favour of seeking the former in the public
23 interest.

24 If you are able to come to a speedy conclusion and
25 write to the Attorney General as soon as possible, and

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1 impress upon him the urgency of your request, then that
2 may go a long way to assist in mitigating as much as
3 possible the effects of the delay, and to ensure, as far
4 as possible, that the Inquiry can resume its work as
5 soon as possible. In that way, Mr Chairman, the
6 derailing effect of the application can be undone.

7 Mr Chairman, unless I can assist further, that is
8 all I had to say on behalf of Counsel to the Inquiry.

9 SIR MARTIN MOORE-BICK: Thank you very much.

10 Well, we are very grateful to all of those who have
11 made submissions on this matter. It's not easy and
12 there are powerful arguments on both sides, so we are
13 going to need time to consider those arguments. We will
14 make a decision as soon as we can and provide it with
15 reasons in writing as soon as we are able to do so.

16 We have stood down the witnesses for today and
17 tomorrow in any event, so we are going to adjourn now
18 for today. I think all I can say about resumption is
19 that we will let you know, as soon as we can see where
20 we are going, what course we are going to take, and we
21 will keep you all as fully informed as we can.

22 But, for now, that's it for today. So thank you all
23 very much.

24 (11.21 am)

25 (The hearing adjourned to a date and time to be confirmed)

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