

<p>1 Tuesday, 24 September 2019 2 (10.30 am) 3 Welcome and opening remarks by THE CHAIR 4 THE CHAIR: Good morning, everyone. I am Alexis Jay, and 5 I'm the chair of this public inquiry. 6 Sitting with me are the other panel members of 7 the inquiry: Professor Sir Malcolm Evans, 8 Drusilla Sharpling and Ivor Frank. 9 On behalf of the inquiry, I welcome you all to this, 10 the third preliminary hearing in the investigation into 11 institutional responses to allegations of child sexual 12 abuse made against the late Lord Janner of Braunstone 13 QC. 14 The inquiry's task in each investigation is to 15 examine the extent to which public and private 16 institutions in England and Wales have failed to protect 17 children from alleged sexual abuse in the past and to 18 make meaningful recommendations to keep children safe 19 today and in the future. 20 In this investigation, the inquiry intends to 21 consider the responses of certain institutions to 22 allegations involving the late Lord Janner. Those 23 institutions include Leicestershire Police, the Crown 24 Prosecution Service, Leicestershire County Council and 25 the Labour Party. We intend to examine whether the</p> <p style="text-align: center;">Page 1</p>	<p>1 responses of those and other institutions were 2 appropriate and adequate and, if not, to consider why it 3 was not and whether Lord Janner's position of prominence 4 in public life improperly influenced those who had 5 a responsibility to act. 6 The purpose of this third preliminary hearing is to 7 provide an update on the investigation and to hear 8 submissions from counsel to the inquiry and core 9 participants on the future of the investigation. In 10 particular, there needs to be an update about the likely 11 impact on this investigation of the recent work of 12 the Independent Office for Police Conduct. The 13 structure of the hearing is set out in the hearing 14 agenda. 15 Before we hear from counsel, there are a couple of 16 points on timing. We will take a 15-minute break at 17 around 11.45 am. If this hearing has not concluded 18 before 1.00 pm, we will take a break for lunch. 19 Directions arising from this hearing will be published 20 on the inquiry's website shortly after the hearing, as 21 will the hearing transcript. 22 I wish, from the outset, to remind everyone about 23 the way in which I expect those appearing before the 24 inquiry to conduct themselves; in particular, those who 25 have been granted core participant status.</p> <p style="text-align: center;">Page 2</p>
<p>1 I acknowledge that there are the strongest of 2 emotions on all sides and that there exist diametrically 3 opposed, but deeply held, views. Nonetheless, I do 4 expect the core participants and their legal 5 representatives will exercise sensitivity and restraint 6 in advancing their submissions to the inquiry and will 7 treat all participants in this hearing with respect. 8 I will now invite the leading counsel to the inquiry, 9 Brian Altman QC, to provide us with an update and to 10 make his submissions. Please go ahead, Mr Altman. 11 Opening statement by MR ALTMAN 12 MR ALTMAN: Thank you, chair. As is known, I am lead 13 counsel to this inquiry. I am assisted today by 14 Mr O'Connor QC, Mr Hill and Ms Cayoun, and the core 15 participants are represented as follows: 16 The Crown Prosecution Service by Mr Brown QC. 17 The Independent Office for Police Conduct by 18 Mr Boyle QC. 19 Leicestershire County Council by Ms King QC and 20 Mr Edwards. 21 The Chief Constable of Leicestershire by Ms Leek QC. 22 The Labour Party by Ms Grey QC. 23 The Department for Education by Ms McGahey QC. 24 The Home Office by Ms Reeves. 25 Mr Creedon by Mr Daw QC and Mr Welch.</p> <p style="text-align: center;">Page 3</p>	<p>1 Mr Perry represents himself. 2 Dr Butler by Mr Hynes QC and Mr Smitten. 3 The Estate of the late Lord Janner of Braunstone QC, 4 Rabbi Laura Janner-Klausner and Marion Janner by 5 Mr Friedman QC and Mr Butler. 6 Mr Janner QC represents himself. 7 Slater &amp; Gordon, on behalf of a number of 8 complainant core participants, if I may be forgiven for 9 not detailing them individually, are represented by 10 Mr Stanage. 11 Howe &amp; Co and Affinity Law, also on behalf of 12 a number of complainant core participants, are jointly 13 represented by Mr Jacobs. 14 Finally, Simpson Millar, also on behalf of a number 15 of complainant core participants and represented by 16 Mr Chapman. 17 So those are the introductions of 18 the representatives. 19 Chair, the central issue for you to consider at this 20 hearing is a procedural one. The Independent Office for 21 Police Conduct, the IOPC, has recently concluded its 22 investigation known as Operation Nori into allegations 23 of police misconduct connected to historic allegations 24 by Leicestershire Police into allegations of child 25 sexual abuse made against the late Lord Janner.</p> <p style="text-align: center;">Page 4</p>

<p>1 As a result of that investigation, the IOPC has                  2 referred a file to the Crown Prosecution Service, the                  3 CPS, for consideration of criminal charges. The                  4 referral is of a single individual. Given the CPS is                  5 considering the file and the possibility that criminal                  6 proceedings might follow, and given the position in                  7 which the inquiry now finds itself, having awaited the                  8 outcome of Operation Nori, the procedural question for                  9 you is whether it is feasible for the inquiry to                  10 maintain the substantive hearing in this investigation                  11 that is currently listed for February next year. In                  12 brief, our submission is that it is not, and the hearing                  13 should be adjourned to alternative dates in October next                  14 year.                  15 Before turning to those submissions, I remind all                  16 present that there are two restriction orders in place.                  17 The first prohibits the publication of information that                  18 might identify somebody as a core participant in this                  19 inquiry, save in specified circumstances, such as when                  20 an individual has waived their anonymity. This is                  21 a longstanding order, which applies across the whole                  22 inquiry. The second order is one which you made on                  23 18 September of this year. It applies to this                  24 investigation only, and prohibits the publication of any                  25 information that might allow members of the public to</p> <p style="text-align: center;">Page 5</p>	<p>1 identify anyone who has made a complaint of child sexual                  2 abuse or has been said by others to be a victim of child                  3 sexual abuse. Again, some exceptions apply in respect                  4 of those who have waived anonymity. Both orders are                  5 published on the inquiry website. I don't envisage that                  6 any of the submissions made today will engage either of                  7 these orders, but if there is any doubt on this matter,                  8 I am going to invite the relevant advocate to discuss                  9 the matter with me or my team in advance of his or her                  10 submissions.                  11 This is the first preliminary hearing in this                  12 investigation for some time. As such, it may assist if                  13 I provide those present with an overview of what the                  14 investigation is about, what it seeks to achieve and                  15 what has happened in the period since the last hearing.                  16 The scope of this investigation was defined in                  17 a determination that you gave on 11 April 2017. That                  18 determination, and also a summary document entitled                  19 "Definition of Scope" are both available on the inquiry                  20 website. In short, this is an investigation about how                  21 institutions responded to allegations of child sexual                  22 abuse made against a prominent politician in the 1990s                  23 and in the first decade of this century. In our                  24 submission, at its heart are a series of questions.                  25 First, did the police and the prosecuting</p> <p style="text-align: center;">Page 6</p>
<p>1 authorities respond properly to the allegations?                  2 Second, if they didn't, why not?                  3 Third, in particular, were the responses of                  4 the institutions improperly influenced by the fact that                  5 they were dealing with a figure of public prominence?                  6 As will be clear from these questions, the main                  7 focus of the investigation is on the police --                  8 specifically, Leicestershire Police -- and the CPS. The                  9 definition of scope refers to other institutions as                  10 well, including Leicestershire County Council, the                  11 Labour Party and government departments: however, it is                  12 the police and the prosecuting authorities who are, we                  13 say, central to this investigation. The allegations                  14 that were made against Lord Janner were of a criminal                  15 nature and it was primarily the duty of the police and                  16 the CPS to respond to them.                  17 A question that has been asked -- entirely                  18 legitimately -- is why it is that these allegations have                  19 been selected for consideration. There are a number of                  20 interrelated reasons.                  21 The inquiry's terms of reference require it to                  22 consider "the extent to which state and non-state                  23 institutions have failed in their duty of care to                  24 protect children from sexual abuse and exploitation".                  25 The terms of reference specifically state that those</p> <p style="text-align: center;">Page 7</p>	<p>1 institutions include the police and prosecuting                  2 authorities, as well as political parties, local                  3 authorities and government departments.                  4 To fulfil its terms of reference, the inquiry must                  5 select case studies to examine. It cannot look into                  6 every alleged failure by an institution to respond to                  7 child sexual abuse. That will, inevitably and                  8 understandably, lead to disappointment. That                  9 disappointment may be felt by those close to a figure                  10 accused of child sexual abuse, or it may be felt, just                  11 as acutely, by those whose complaints have not been                  12 heard by this inquiry.                  13 The inquiry is required by its terms of reference to                  14 consider information already obtained by "reviews, court                  15 cases and investigations". The point is to build on                  16 previous work and to use evidence previously obtained.                  17 In this instance, considerable work has already been                  18 done by Leicestershire Police in a later investigation                  19 called Operation Enamel, by Sir Richard Henriques in his                  20 report, and, as I have said, by the IOPC. I will return                  21 to these investigations later.                  22 As a result of this work, there is a credible and                  23 substantial body of evidence that suggests that there                  24 may have been institutional failings as regards the                  25 response to the allegations of child sexual abuse made</p> <p style="text-align: center;">Page 8</p>

<p>1 against Lord Janner.                  2 As we understand it, when he died, Lord Janner was                  3 awaiting a trial of the facts on 22 charges involving                  4 child sexual abuse relating to nine complainants. The                  5 CPS had advised that a further 12 charges relating to                  6 another three complainants should also be tried. Other                  7 allegations were under consideration by the police.                  8 The decision to charge Lord Janner was made                  9 following the application by the CPS of the Full Code                  10 Test in the Code for Crown Prosecutors, which involves                  11 a prosecutor making an objective assessment about                  12 whether there is sufficient evidence to provide                  13 a realistic prospect of conviction in respect of each                  14 charge. The CPS sought advice on charge from                  15 independent leading counsel. These decisions had come                  16 at the end of a lengthy and complex investigation                  17 carried out by Leicestershire Police from 2012 -- that                  18 was Operation Enamel.                  19 Sir Richard Henriques, a retired High Court judge,                  20 was commissioned by the CPS to conduct an independent                  21 review of past decision making in the case, and he                  22 published a report in January 2016 in which he                  23 concluded, among other matters, that in 1991, there was                  24 a sufficiency of evidence for a prosecution to be                  25 commenced against Lord Janner for offences relating to</p> <p style="text-align: center;">Page 9</p>	<p>1 child sexual abuse. He criticised the police station                  2 investigation at that time as being incomplete and                  3 inadequate.                  4 In 2002, there had been a "remarkable" failure by                  5 the police to provide a statement about a further                  6 allegation of child sexual abuse to the CPS. He                  7 concluded that if the statement had been provided, then                  8 there would have been a sufficiency of evidence for                  9 a prosecution to be commenced at that time.                  10 In 2007, Lord Janner should have been arrested and                  11 charged following further allegations of child sexual                  12 abuse.                  13 In summary, he concluded that failures by                  14 Leicestershire Police and the CPS meant that Lord Janner                  15 was not charged on three occasions between 1991 and 2007                  16 when he could have been. These allegations related to                  17 three different complainants.                  18 Sir Richard's findings were accepted by both the CPS                  19 and the Leicestershire Police.                  20 However, to be clear, the report to which I have                  21 just referred is not the same as the widely publicised                  22 report that the same retired judge,                  23 Sir Richard Henriques, prepared for the                  24 Metropolitan Police into the Met's now notorious                  25 Operation Midland. That operation, of course, was an</p> <p style="text-align: center;">Page 10</p>
<p>1 investigation into allegations made by Carl Beech, also                  2 known as "Nick", of a so-called Westminster paedophile                  3 ring of prominent individuals. One of the prominent                  4 individuals whom Beech accused of having been involved                  5 in organised child sexual abuse was Lord Janner. In his                  6 Midland report, as is now well known, Sir Richard                  7 expressed the view that Beech's allegations were so                  8 lacking in credibility that they should never have been                  9 investigated. But he reached a very different                  10 conclusion in his report to the CPS, to which I have                  11 already referred. That report focused on the way in                  12 which the CPS had dealt with quite separate allegations                  13 of child sexual abuse that had been made against                  14 Lord Janner. The allegations did not include any made                  15 by Beech, and in that report, as I have said,                  16 Sir Richard was critical of the CPS and                  17 Leicestershire Police for the way in which the                  18 allegations were considered and he concluded that                  19 Lord Janner should have been arrested and charged.                  20 It is right that I should emphasise that Lord Janner                  21 was never convicted of any offence, nor was he found                  22 liable for child sexual abuse in any civil court.                  23 Indeed, had the trial of the facts proceeded, he may not                  24 have been found to have acted as alleged at all and, as                  25 counsel to the inquiry have said in submissions made</p> <p style="text-align: center;">Page 11</p>	<p>1 in February 2017, it is not valid to aggregate                  2 allegations, charges and institutional self-criticism                  3 and conclude that there can be no smoke without fire.                  4 I also emphasise that the findings of                  5 Sir Richard Henriques have not been accepted by all                  6 involved, or potentially involved, in this                  7 investigation. You and the panel are not bound by them,                  8 and you could come to different conclusions. However,                  9 what is, in our submission, beyond dispute is that there                  10 is sufficient evidence of institutional failings for                  11 this inquiry to consider this matter within its terms of                  12 reference.                  13 It is for these reasons that you determined                  14 in April 2017 that this investigation should continue.                  15 However, you also said that evidence that emerges from                  16 other proceedings may affect your approach to the                  17 investigation and its position in relation to the                  18 inquiry's other work.                  19 Now let me deal with developments. Since that time,                  20 there have been three developments about which I should                  21 comment. The first, which I have already mentioned, is                  22 that the IOPC have concluded Operation Nori. A file on                  23 one individual has been passed to the CPS. I will deal                  24 later with the significant effect that this has had on                  25 this investigation.</p> <p style="text-align: center;">Page 12</p>

<p>1 The second is that civil claims made by a number of                  2 complainants against the estate of Lord Janner have been                  3 withdrawn. This removes any question of whether or not                  4 the inquiry should await the outcome of those                  5 proceedings before commencing public hearings. However,                  6 it has no further relevance. The civil claims concerned                  7 the question of whether or not Lord Janner had abused                  8 the claimants in those cases. That is a different                  9 question from the one this investigation asks, namely,                  10 whether or not institutions responded to allegations                  11 appropriately.</p> <p>12 The third development, which I raise only for                  13 clarity, is the recent conviction of Carl Beech.                  14 Beech's false allegations of child sexual abuse included                  15 allegations made against Lord Janner. However, Beech                  16 was not one of the complainants whose allegations might                  17 have been heard in the criminal proceedings that                  18 Lord Janner was facing at the time of his death. Nor,                  19 as I have said, was he one of the complainants                  20 considered by Sir Richard Henriques in his report into                  21 the CPS handling of allegations against Lord Janner.                  22 Beech's allegations have never formed part of your                  23 investigation. He was never given core participant                  24 status. No witness evidence has ever been taken from                  25 him. Therefore, his convictions have no direct</p> <p style="text-align: center;">Page 13</p>	<p>1 relevance to it. I mention this only to avoid any                  2 misconceptions about the matter.</p> <p>3 Having set out what this inquiry is, it may be                  4 helpful to tackle some of the other misconceptions,                  5 myths and distortions that have entered the public                  6 domain about it.</p> <p>7 The first is that this is an investigation into                  8 Lord Janner or a proxy trial of him. It is not. As                  9 I have said, it is an investigation into institutions                  10 and the way in which institutions responded to certain                  11 allegations. Under section 2(1) of the Inquiries Act                  12 2005, the inquiry is prohibited from making                  13 a determination of civil or criminal liability, and we                  14 would oppose any suggestion that this should be a trial                  15 of Lord Janner by other means. We made that point in                  16 our submissions in February 2017, and we repeat it now.</p> <p>17 Second is the notion that the investigation proceeds                  18 on an assumption of guilt or violates the principle that                  19 an individual is innocent until proven guilty. These                  20 points are factually incorrect and legally misconceived.                  21 The presumption of innocence applies in criminal                  22 proceedings where the prosecution has to prove that an                  23 individual is guilty before a court imposes a criminal                  24 sanction. This is not a court. This is no criminal                  25 prosecution. These are not adversarial proceedings but</p> <p style="text-align: center;">Page 14</p>
<p>1 inquisitorial. They do not set out to answer the                  2 question whether or not Lord Janner was guilty of                  3 offences involving child sexual abuse. They seek to                  4 examine whether institutions responded properly to                  5 allegations that were made about him. These are                  6 different questions, approached through different                  7 procedures.</p> <p>8 Third, it has been suggested that Lord Janner has                  9 been somehow "singled out" as the only individual being                  10 examined by the inquiry. This isn't true. The inquiry                  11 has considered a number of case studies that each                  12 focused on the way in which institutions have responded                  13 to allegations against a high-profile individual. These                  14 individuals have included Archbishop Peter Ball,                  15 Sir Cyril Smith, Sir Peter Morrison and                  16 Sir Peter Hayman. The inquiry cannot examine                  17 institutional failings in the abstract, it must look at                  18 specific cases.</p> <p>19 Whilst it is true that this is the only one of                  20 the inquiry's investigations that bears the name of                  21 a high-profile individual in its title, that is simply                  22 because the issues that arise in relation to the                  23 allegations against Lord Janner are factually discrete                  24 and can best be addressed separately. This is, entirely                  25 understandably, a source of considerable distress to his</p> <p style="text-align: center;">Page 15</p>	<p>1 family: we recognise this. Considerable thought was                  2 given by the inquiry to whether the investigation should                  3 be amalgamated with other work being undertaken by it;                  4 in particular, the Westminster investigation. However,                  5 that would greatly have increased costs and would also                  6 have led to the hearings in the Westminster                  7 investigation, which in fact took place in March this                  8 year, being delayed by 18 months.</p> <p>9 Finally, there is the issue of findings of fact on                  10 the underlying allegations of abuse. Other                  11 investigations conducted by the inquiry have proceeded                  12 without such findings being made, and it has been                  13 suggested that there is a difference of approach here.                  14 There is not. Chair, you have yet to make a final                  15 ruling on this issue in this investigation for the                  16 simple reason that we have not yet reached the stage                  17 where informed submissions can be made on this point by                  18 all core participants at a public hearing. That is the                  19 sole reason why the questions remains open.</p> <p>20 Let me return now, please, to the principal business                  21 of today, that is to say, submissions on the                  22 consequences for this investigation of the IOPC's                  23 decision to refer a file concerning one individual to                  24 the CPS.</p> <p>25 In your determination of April 2017, you concluded</p> <p style="text-align: center;">Page 16</p>

<p>1 that the public hearings should not take place until you                  2 were satisfied that an appropriate balance had been                  3 struck to minimise (a) duplication of work being                  4 conducted by other organisations, in particular the                  5 IOPC; (b) the risk that a public hearing would                  6 contaminate evidence relevant to any criminal                  7 proceedings; and (c) the risk that the welfare of some                  8 individuals may be adversely affected by repeated                  9 questioning.                  10 All three of these factors were live during the                  11 course of the IOPC investigation. That investigation                  12 only concluded at the end of last month.                  13 In the time since your April 2017 determination, the                  14 inquiry has conducted what work it could in light of                  15 the factors that you identified. We instructed experts,                  16 whose reports have been used in other investigations in                  17 this inquiry. We have obtained extremely detailed                  18 corporate statements from Leicestershire County Council                  19 and Leicestershire Police. We have searched for,                  20 obtained and reviewed a vast range of materials from                  21 organisations including the Kirkwood Inquiry into                  22 child abuse in Leicestershire, the Metropolitan Police,                  23 the Labour Party, the Cabinet Office, the Department of                  24 Health and Social Care, the security and intelligence                  25 agencies, the Henriques Inquiry, the London School of</p> <p style="text-align: center;">Page 17</p>	<p>1 Economics, the NSPCC, the Community Security Trust, and                  2 of course Leicestershire Police, Leicestershire Council,                  3 the CPS and the IOPC. Hundreds of thousands of pages                  4 have been provided to the inquiry. The inquiry has also                  5 obtained witness statements from a wide range of                  6 potential witnesses. All of this preparatory work has                  7 been undertaken to ensure that the hearings could                  8 commence as quickly as possible should a decision be                  9 taken to proceed.                  10 There have, however, been various steps that the                  11 inquiry has not been able to take during this period.                  12 In particular, it has not been able to approach                  13 witnesses closely involved in the IOPC investigation for                  14 evidence, including both police officers and                  15 complainants. Nor have we been able to disclose                  16 materials pertinent to that investigation to core                  17 participants. To have done so would have risked                  18 prejudicing the investigation and any criminal                  19 proceedings that may have followed.                  20 The inability to disclose materials to core                  21 participants is of particular importance. It has meant                  22 that they have not been -- and are still not -- in                  23 a position to make informed submissions to you about the                  24 future of the investigation. That in turn has meant                  25 that you have not been able to make decisions on</p> <p style="text-align: center;">Page 18</p>
<p>1 critical matters, such as the issues that the public                  2 hearings should cover, who should be called to give                  3 evidence, the approach to be taken to the findings of                  4 fact on the underlying allegations, and the procedures                  5 by which witnesses should be questioned. This in turn                  6 has hampered preparations for the hearings, both by the                  7 inquiry team and by core participants.                  8 The consequence has been that a planned preliminary                  9 hearing intended for May 2019 was postponed until today.                  10 This was done in the hope that we may have been able to                  11 address those questions now, and thereby allow enough                  12 time for the full public hearings to go ahead                  13 in February next year, if you had so decided.                  14 Unfortunately, that has not proved possible.                  15 The reason for this is the IOPC's decision to refer                  16 an individual to the CPS. This means that the inquiry                  17 can't disclose to core participants the report that has                  18 been produced by the IOPC in Operation Nori. We                  19 consider it essential that core participants see that                  20 report and have sufficient time to analyse the                  21 considerable detail and complexity it contains before                  22 making submissions on the future of the investigation.                  23 As those submissions can't be made, we can't ask you                  24 to decide the matters that are required to guide the                  25 next stage of this investigation.</p> <p style="text-align: center;">Page 19</p>	<p>1 That in turn means that the hearings                  2 in February 2020 can't, in our submission, go ahead.                  3 A large amount of work still has to be done and much of                  4 it has to await your decisions. There is simply not                  5 enough time left now to allow proper preparations for                  6 hearings in February next year.                  7 The detail of the work involved is set out in a note                  8 by the solicitor to the inquiry which has been disclosed                  9 to core participants and will be published on the                  10 inquiry website.                  11 I stress that these are not simply arid points of                  12 procedure and process. They are matters concerning the                  13 inquiry's fundamental duty to be fair to all core                  14 participants, all witnesses and all those affected by                  15 this investigation. They also go to the critical                  16 importance of ensuring that this investigation is                  17 effective in providing you and the panel with the                  18 evidence that you would need to come to just and                  19 appropriate conclusions about the institutions that you                  20 are examining.                  21 It follows that our primary submission today is that                  22 the hearing dates in February 2020 have to be vacated.                  23 We have received written submissions from core                  24 participants which have been circulated. They raise                  25 a number of important points which you will have</p> <p style="text-align: center;">Page 20</p>

<p>1 considered. In outline, on behalf of 18 complainant                  2 core participants, representatives from Affinity Law,                  3 Howe &amp; Co and Simpson Millar resist the proposed                  4 adjournment and urge you to retain the existing                  5 timetable for a substantive hearing in February 2020.                  6 They are joined in this by Mr Perry. On the other hand,                  7 those complainant core participants represented by                  8 Slater &amp; Gordon accept, or don't oppose, the proposals                  9 as to relisting for October 2020, as do Mr Creedon, the                  10 Janner family and those institutional core participants                  11 who have expressed a view.</p> <p>12 Understandably, core participants have expressed                  13 reservations and disappointment about these delays                  14 across the board. Can I say that we are alive to the                  15 degree of distress that repeated delay has caused to                  16 those core participants who are personally concerned                  17 with this investigation and that support continues to be                  18 available to them through the usual channels, as the                  19 investigation solicitor has emphasised in                  20 correspondence. However, no good will come from holding                  21 out false hope. It is our very firm submission that,                  22 given where we are now, it will not be possible to have                  23 a fair and effective hearing in a little over four                  24 months' time.</p> <p>25 Several core participants have, in their written</p> <p style="text-align: center;">Page 21</p>	<p>1 submissions, questioned whether it really is the case                  2 that any criminal proceedings would be prejudiced by our                  3 holding full public hearings. They give examples of                  4 instances where public inquiries have been able to hold                  5 hearings notwithstanding prospective or parallel                  6 criminal investigations: Hillsborough, Grenfell, and,                  7 within this inquiry, the investigation into child sexual                  8 abuse in the English Benedictine Church. We had                  9 considered whether there was anything to be learned from                  10 such examples before forming our original submissions.                  11 We believe that the circumstances are different here.                  12 To our knowledge, neither the Hillsborough Inquests nor                  13 the Grenfell Inquiry proposed to hold hearings at the                  14 same time as the CPS were actively taking a prosecution                  15 decision into potentially the same matters. In this                  16 inquiry, the timetable of the English Benedictine Church                  17 investigation was altered so that the pending                  18 prosecution of Laurence Soper would conclude before the                  19 inquiry's public hearings into related matters. The                  20 prosecution having concluded in December 2017, the                  21 hearing into events at Ealing Abbey was in fact held                  22 in February 2019.</p> <p>23 Even if hearings in February 2020 were not such as                  24 would prejudice any criminal proceedings, the point is                  25 an academic one because we have been unable to use this</p> <p style="text-align: center;">Page 22</p>
<p>1 hearing for planning those hearings and resolving the                  2 many issues that require argument and determination by                  3 you.</p> <p>4 We do, however, note the points made about future                  5 disclosure, in particular the question of what can be                  6 provided to core participants ahead of any CPS charging                  7 decision. We don't think that this calls for any                  8 determination by you, but I can assure core participants                  9 that the inquiry's legal team will consider these points                  10 carefully now that we have more clarity from the IOCP                  11 over the matters that have been referred to them. We                  12 remind core participants that we only learned of this                  13 last month. We will take this forward with the relevant                  14 institutions and core participants and will continue to                  15 provide regular updates on disclosure matters.</p> <p>16 May I mention briefly some of the further points                  17 that have been raised? Simpson Millar have suggested                  18 that you should revisit your "test" for when the                  19 hearings should take place. In particular, they argue                  20 that you should adopt an approach akin to that of courts                  21 in civil litigation. We agree that the position has                  22 changed substantially from the position in April 2017,                  23 but we are not persuaded that it would be helpful now to                  24 set out a particular test. Should further adjournments                  25 be contemplated, Simpson Millar and other core</p> <p style="text-align: center;">Page 23</p>	<p>1 participants will be free to make submissions on the                  2 approach to be adopted in light of all the circumstances                  3 relevant at that time.</p> <p>4 Simpson Millar also argue that the focus of this                  5 investigation should be on Leicestershire County Council                  6 and not Leicestershire Police and the CPS. We have                  7 given our reasons as to why we respectfully take                  8 a different view at present. But these are matters that                  9 will need to be considered at the next preliminary                  10 hearing when the detailed list of issues is discussed                  11 following more extensive disclosure. Only then will                  12 you, not us, make the decision on where the focus of                  13 the investigation should fall.</p> <p>14 There are some further points that I do not think                  15 I need to air publicly, for example, those relating to                  16 requests for evidence and issues of anonymity concerning                  17 individual core participants. We have made a note of                  18 these and the investigation solicitor will correspond                  19 directly with core participants about them.</p> <p>20 So what, then, of the future of this investigation?                  21 The inquiry must await the decision of the CPS on                  22 whether to bring criminal charges in the matters that                  23 have been referred to them. The inquiry cannot impose                  24 a timetable on the CPS, nor would it seek to do so. The                  25 CPS is an independent organisation that must discharge</p> <p style="text-align: center;">Page 24</p>

<p>1 its own statutory duties. You may hear submissions from                  2 Mr Brown on behalf of the CPS shortly. I will, if                  3 necessary, respond to what is said after you have heard                  4 from others.</p> <p>5 The solicitor to the inquiry has identified                  6 a potential alternative date for the full public                  7 hearings in October 2020. Accommodating a hearing at                  8 that time would be difficult, but it is achievable.</p> <p>9 In order for the October 2020 date to be met,                  10 a number of conditions have to be met equally. These                  11 are set out in our written submissions, and I don't                  12 repeat them in full.</p> <p>13 The key point is that the CPS must make a decision                  14 not to charge and to do so by 6 January. This is to                  15 allow enough time for a preliminary hearing no later                  16 than 20 February, which would then provide sufficient                  17 time to prepare for the hearings in October.</p> <p>18 Were the CPS to decide not to prosecute, it does not                  19 mean that public hearings in October 2020 will follow as                  20 night follows day. It has been suggested in some of                  21 the submissions that it is only now that the possibility                  22 of this investigation not proceeding to public hearings                  23 has been raised or at least acknowledged. This isn't                  24 correct. As I said earlier, you stated in                  25 your April 2017 determination that your approach to the</p> <p style="text-align: center;">Page 25</p>	<p>1 inquiry would be affected by evidence that emerged from                  2 other investigations. It has also been clear for                  3 a considerable time that some core participants will                  4 seek to argue that the investigation should cease. In                  5 particular, they may say that sufficient investigations                  6 have now taken place, that this inquiry can add little                  7 or nothing to them, or that a three-week hearing would                  8 be insufficient to do justice to the complex and                  9 difficult issues in play. They are entitled to make                  10 those arguments to you, and other core participants are                  11 equally entitled to resist them. However, this must be                  12 done in a fair and structured way, when more information                  13 is available and when all concerned have had an                  14 opportunity to make their submissions in full.</p> <p>15 We note that some core participants argue that you                  16 should make a determination today that the public                  17 hearings will take place no matter what. We reserve our                  18 position on these and related matters and suggest that                  19 any submissions on such issues will have to be                  20 determined at a later date.</p> <p>21 We also note a further issue. In any public                  22 hearings, it is likely that evidence will be heard that                  23 could allow a witness or core participant to be                  24 identified as someone who is said to have been subjected                  25 to child sexual abuse. This is because the evidence at</p> <p style="text-align: center;">Page 26</p>
<p>1 the hearings, when combined with material already in the                  2 public domain, will allow for what is known as "jigsaw                  3 identification". The individuals involved must consider                  4 whether they are willing to put themselves in that                  5 position and whether they are willing to waive or limit                  6 their statutory right to anonymity. This will be a very                  7 difficult decision for them. The inquiry cannot, in our                  8 submission, proceed unless a resolution can be found                  9 that is lawful, fair and acceptable to the individuals                  10 concerned. This is not an issue for today, but, again,                  11 we raise it for future consideration. We hope to take                  12 the matter forward in discussions with the legal                  13 representatives of core participants.</p> <p>14 I turn now to the difficult question of what will                  15 happen if the October 2020 hearings are not viable.                  16 Hearings after that date will delay the completion of                  17 this inquiry and the publication of its final report.                  18 That is a very serious matter for the inquiry and all                  19 involved with it. Core participants from other                  20 investigations, understandably and justifiably, will                  21 want the report published at the earliest opportunity.                  22 So, too, will members of the public and parliament.                  23 There is a real and pressing public interest in the                  24 inquiry providing its report and its recommendations as                  25 soon as is reasonable and practicable. You will no</p> <p style="text-align: center;">Page 27</p>	<p>1 doubt have these matters in mind. Nothing more can                  2 usefully be said on this point now, but, again, I raise                  3 it for future consideration.</p> <p>4 So, in light of what I have said, we invite you,                  5 chair, to make three directions, all of which concern                  6 the timetable.</p> <p>7 First, that the hearings for February next year be                  8 vacated.</p> <p>9 Second, that a preliminary hearing be listed for                  10 either the earliest practicable date following the CPS                  11 decision on the referred matter or by 20 February 2020.                  12 We have set out in our written submissions the matters                  13 that we consider will need to be determined at that                  14 hearing.</p> <p>15 Third, that the public hearings be provisionally                  16 listed for October 2020 for three weeks, subject to                  17 discussions with core participants about dates to avoid.</p> <p>18 We are conscious that this means a further wait and                  19 further uncertainty for those affected by this                  20 investigation. As I have said, we are mindful that many                  21 involved will find this difficult and distressing. We                  22 deeply regret that. We have done all that we reasonably                  23 could to allow this hearing to consider the outstanding                  24 questions that must be answered in order for this                  25 investigation to proceed. That this has not proved</p> <p style="text-align: center;">Page 28</p>

<p>1 possible is a consequence of other investigations                  2 performed by other public bodies. To date, the inquiry                  3 has, rightly, allowed them to take their course.                  4 Before I conclude, may I turn to a few other matters                  5 that have been raised in the course of the submissions                  6 about your recent restriction order?                  7 It was counsel to the inquiry who proposed that                  8 order. One of our reasons for doing so was because                  9 Mr Janner had informed the inquiry that he intended to                  10 read a statement at this hearing containing sensitive                  11 personal information about some of those who had made                  12 allegations against his late father. That information                  13 included details of mental health, criminal convictions                  14 and matters from social security records.                  15 In our written submissions, we informed core                  16 participants of Mr Janner's intention. Unsurprisingly,                  17 this provoked a strong response.                  18 Mr Janner has informed the inquiry that he now does                  19 not intend to read this statement at today's hearing.                  20 As a result, there is no need for you, chair, to make                  21 any ruling about it. However, in light of the                  22 submissions raised, it may be helpful if I make a couple                  23 of points of general application.                  24 First, we consider that information about a named                  25 individual's mental health, criminal convictions or</p> <p style="text-align: center;">Page 29</p>	<p>1 indeed social services records should only be adduced at                  2 the inquiry's public hearings if such information is                  3 relevant to the matters in issue, and only then if it                  4 would be fair and proportionate for it to be made                  5 public. The information contained in Mr Janner's                  6 proposed statement is not relevant to the preliminary                  7 hearing, as Mr Janner accepts.                  8 Secondly, it would be quite wrong for any individual                  9 involved in this inquiry, from any quarter, to seek to                  10 make submissions or present evidence at a public hearing                  11 for the purpose of intimidating or harassing witnesses.                  12 This would be an abuse of the inquiry's processes. It                  13 might amount to a breach of the Witnesses (Public                  14 Inquiries) Protection Act 1892 and/or any relevant                  15 professional disciplinary code. Counsel to the inquiry                  16 have been, and will continue to be, alert to these                  17 matters. We have not so far felt it necessary to                  18 intervene, nor are we aware of any witness or core                  19 participant withdrawing from the inquiry because of what                  20 they perceive to be intimidation or harassment. But, as                  21 I say, we remain watchful.                  22 Chair, you are now going to hear oral submissions on                  23 behalf of the core participants. We have proposed                  24 a slight modification of the usual order of speaking so                  25 that those who wish to oppose the suggested</p> <p style="text-align: center;">Page 30</p>
<p>1 retimetabling will have an opportunity to make their                  2 arguments having heard what is said by others. So this                  3 is the proposed order. First, the Crown Prosecution                  4 Service; then the IOPC; followed by Leicestershire                  5 County Council; and then Leicestershire Police; the                  6 Labour Party; the Department for Education; the                  7 Home Office; Mr Creedon; Mr Perry; Dr Butler; and then                  8 the Estate of the late Lord Janner, Rabbi                  9 Janner-Klausner and Marion Janner, then Mr Janner                  10 himself, Slater &amp; Gordon on behalf of their complainant                  11 core participant clients; Howe &amp; Co, followed by                  12 Affinity Law on behalf of their respective core                  13 participant clients; and finally Simpson Millar.                  14 Finally, before, chair, I sit down, I am told that                  15 there has been an intermittent technical problem with                  16 the transcript in the annex, which is being looked into,                  17 but apparently it's not possible to resolve it today,                  18 for which apologies. But apparently the video feed to                  19 the annex is working fine. So those are my submissions                  20 for the present.                  21 THE CHAIR: Thank you, Mr Altman. Mr Brown?                  22 Submissions by MR BROWN                  23 MR BROWN: Thank you, chair. Just to give a little                  24 background, which will, I hope, help everybody's                  25 submissions, the CPS received the file to examine the</p> <p style="text-align: center;">Page 31</p>	<p>1 evidence from the IOPC a little less than two weeks ago,                  2 on 12 September. The file, of course, is a different                  3 thing from the report, which itself, as all core                  4 participants understand from Mr Altman's note, was                  5 a long and complex one.                  6 From the submissions to this inquiry, it is clear                  7 that the scope of the evidence gathered by the IOPC was                  8 wide and the material in some respects complex.                  9 The review by the CPS to decide whether the Code for                  10 Crown Prosecutors is satisfied in respect of any                  11 potential criminal charges has of course begun. It goes                  12 without saying that the review by the Crown Prosecution                  13 Service that will lead to the decision as to whether                  14 charges are brought or not must be independent,                  15 objective and thorough, but carried out in a timely                  16 fashion, of course.                  17 Experience tells us that it is frequently the case,                  18 however, that further information and sometimes further                  19 clarification is sought. It is almost impossible to                  20 imagine that in this particular case that won't happen;                  21 whether it is simple clarification or more complex.                  22 It is, I'm afraid, at present, simply too early to                  23 say with any helpful precision when a decision will have                  24 been made. Of course the Crown Prosecution Service is                  25 aware of the timescales outlined by Mr Altman in his</p> <p style="text-align: center;">Page 32</p>



<p>1 helpful note, and again today, and of the submissions of 2 the core participants. 3 Equally, whether there could be any significant 4 prejudice to any criminal process by the hearing taking 5 place next year will also be looked at carefully. That 6 is a separate and independent approach. 7 The precise scope of the inquiry, this strand of 8 the inquiry, could affect any issue in respect of 9 prejudice to any criminal proceedings, something that of 10 course the inquiry will keep under review. 11 In those circumstances, although, of course, all 12 participants would like to know a definitive timescale, 13 it is simply too early to give that positive and helpful 14 information. However, the Crown Prosecution Service 15 will keep the inquiry informed of progress in as much 16 detail as will be helpful, but also consistent with the 17 sensitivities of any decision concerning criminal 18 charges. 19 We do, however, encourage the fixing of a further 20 preliminary hearing early next year at the latest, which 21 will allow the inquiry to retain all its options as 22 outlined today. As I say, we will be as helpful as we 23 can as time progresses in the next few weeks and months, 24 and we hope that the inquiry will be able to do 25 everything that its duty demands.</p> <p style="text-align: center;">Page 33</p>	<p>1 Unless I can help the chair at this stage any 2 further, those are our submissions. 3 THE CHAIR: Thank you, Mr Brown. Mr Boyle? 4 Submissions by MR BOYLE 5 MR BOYLE: Good morning, chair. Chair, the IOPC has no 6 objection to the directions that you have been invited 7 to make. Can I just add one or two further comments. 8 We will, of course, do what we can to assist the CPS 9 with any further requests that they may make whilst 10 they're undertaking their decision. 11 Operation Nori, as you have already heard, has been 12 a complex and extensive investigation involving 13 a significant number of individual subjects and 14 witnesses relating to significant events involved in the 15 course of three substantial historic police 16 investigations going back over a number of decades. 17 It has involved the consideration of a vast amount 18 of documentary evidence and conducting numerous and at 19 times lengthy interviews and reinterviews with both 20 witnesses and subjects of the investigation. 21 Given the vulnerable nature of a number of 22 the witnesses, considerable care has been required 23 throughout. 24 The investigation resulted in the production of 25 a report which, you will have read in counsel to the</p> <p style="text-align: center;">Page 34</p>
<p>1 inquiry's submissions, is over 200 pages long, has 2 1,700-plus paragraphs, with accompanying decisions and 3 recommendations which run to an additional 50 further 4 pages or so by themselves. It has been a vast 5 undertaking on the part of the IOPC. 6 Counsel to the inquiry's submissions acknowledge 7 that it is a document that must be analysed with care, 8 and it was with great care that the decision maker 9 undertook his role during the summer of this year to try 10 to reach his decisions in relation to the statutory 11 obligations he has. 12 It was important that the decisions were based upon 13 a report which reflected a rational, reasonable and 14 proportionate response to the nature of 15 the investigation which had been undertaken. It is, of 16 course, regrettable that it has taken longer than was 17 anticipated, but it was simply important to ensure that 18 the task undertaken was both thorough and fair to all 19 concerned. 20 THE CHAIR: Thank you, Mr Boyle. Ms King? 21 Submissions by MS KING 22 MS KING: Thank you, chair. On behalf of Leicestershire 23 County Council, written submissions have been provided, 24 and on that basis, and consistent with those 25 submissions, LCC does not oppose the adjournment or the</p> <p style="text-align: center;">Page 35</p>	<p>1 directions that are sought, and it will continue to 2 provide as much assistance to the inquiry and comply 3 with requests made by counsel to the inquiry to assist 4 in the further work of this panel. 5 THE CHAIR: Thank you, Ms King. Ms Leek? 6 Submissions by MS LEEK 7 MS LEEK: Chair, as you know, the chief constable takes the 8 inquiry and its terms of reference extremely seriously 9 and has ensured the full co-operation of 10 Leicestershire Police in all aspects of 11 the investigation. It is his firm belief that the roles 12 played by relevant institutions during the 1990s and 13 2000s should properly be assessed by the inquiry's 14 formal evidence-gathering and hearing process, and not 15 unravelled and debated in the media. 16 Chair, all matters sought to have been raised by the 17 chief constable today, in particular to correct 18 misconceptions and rumour in the media, have now been 19 addressed by Mr Altman, and the chief constable has no 20 further submissions. 21 THE CHAIR: Thank you, Ms Leek. Ms Grey? 22 Submissions by MS GREY 23 MS GREY: Thank you, madam. Madam, the Labour Party filed 24 brief written submissions acknowledging or recognising 25 the need for the directions sought by counsel to the</p> <p style="text-align: center;">Page 36</p>

<p>1 inquiry, and I have nothing further to add to those 2 submissions.</p> <p>3 We would, however, just very briefly ally ourselves 4 with those who have expressed concerns about the volume 5 of disclosure that has yet to be made in this strand of 6 the inquiry, and so we would join them in asking for the 7 best endeavours on behalf of the inquiry and its team to 8 advance that task of disclosure as soon as possible, and 9 as much as possible, before any further preliminary 10 hearing that you may be minded to schedule, having heard 11 and adjudicated upon the issues before you today. Thank 12 you, madam.</p> <p>13 THE CHAIR: Thank you, Ms Grey. Ms McGahey? 14 MS MCGAHEY: Madam, the Department for Education has no 15 submissions to make.</p> <p>16 THE CHAIR: Thank you, Ms McGahey. Ms Reeves? 17 MS REEVES: Chair, consistent with the Home Office's email 18 of 5 September 2019, the Home Office has no objection to 19 the directions proposed by counsel to the inquiry.</p> <p>20 THE CHAIR: Thank you. Mr Daw? 21 MR DAW: Mr Creedon's submissions are before you in writing 22 and we have nothing to add to those.</p> <p>23 THE CHAIR: Thank you, Mr Daw. Mr Perry? 24 25</p> <p style="text-align: center;">Page 37</p>	<p>1 Submissions by MR PERRY</p> <p>2 MR PERRY: Madam, chair, thank you for giving me the 3 opportunity. I have submitted in writing to you my 4 views as to what should happen. I don't propose to 5 amplify on that any further. I did actually say that 6 I felt that the solicitor to the inquiry, and indeed 7 Mr Altman, were rather benevolent to the CPS. I think 8 I would have preferred to put more pressure on them.</p> <p>9 To some extent, the citizens of Leicestershire, of 10 which I am one, are hostages to fortune when it comes to 11 policing. We have the Leicestershire Constabulary, or 12 the Leicestershire Police as it is now known. There is 13 no alternative. You will judge them when you finally 14 submit your report, rightly or wrongly, having 15 considered an awful lot of evidence. You have been held 16 hostage to fortune in that the only people that you have 17 got to investigate Leicestershire Police was the IPCC 18 originally, and IOPC.</p> <p>19 I think you should judge them before you judge the 20 report. You have need to investigate and satisfy 21 yourself that it is a good-quality report written by 22 good-quality people. If you were giving somebody a job, 23 you would look at their references, you would look at 24 their skills and experience. I would suggest that you 25 might want to do that. In addition, you might want to</p> <p style="text-align: center;">Page 38</p>
<p>1 ask to see a copy of the investigation log, as well as 2 read the report, because then you will see how the time 3 has been spent. That's all I wish to say. Thank you, 4 madam chair.</p> <p>5 THE CHAIR: Thank you, Mr Perry. Mr Butler -- Mr Hynes, 6 apologies.</p> <p>7 Submissions by MR HYNES</p> <p>8 MR HYNES: Madam chair, Mr Hynes on behalf of Dr Butler. We 9 have no objection to the directions sought by counsel to 10 the inquiry, but for the avoidance of doubt, we can say 11 that Dr Butler is not the individual who has been 12 referred to the Crown Prosecution Service and he has 13 been informed that he will not face any disciplinary 14 proceedings.</p> <p>15 THE CHAIR: Thank you, Mr Hynes. Mr Friedman? 16 MR JANNER: Before we start, can I check one point with 17 Mr Altman, as he invited us to do? 18 MR ALTMAN: Chair, might I suggest -- it is close to your 19 break time. It would be much easier if Mr Janner speaks 20 to me without everybody looking on.</p> <p>21 THE CHAIR: Yes, I agree with that. Let's return at 22 11.50 am. 23 (11.35 am) 24 (A short break) 25 (11.52 am)</p> <p style="text-align: center;">Page 39</p>	<p>1 MR ALTMAN: Chair, can I just say that Mr Janner has asked 2 if he can go before Mr Friedman, and we have to 3 objection to that.</p> <p>4 THE CHAIR: Please go ahead, Mr Janner.</p> <p>5 Submissions by MR JANNER</p> <p>6 MR JANNER: Thank you. May it please you, madam chair, may 7 I begin by thanking you for giving me this first 8 opportunity to address you on behalf of my family in 9 this strand. Thank you. We have been waiting four long 10 years to do so, and it has been four long years since 11 our beloved, late, innocent father died of severe 12 dementia.</p> <p>13 It has been four years since the false allegations 14 began to unravel in public.</p> <p>15 We saw it with the collapse of the civil claims 16 against him, and then the estate. We saw it with the 17 false allegations of the fantasist Carl Beech -- 18 "Nick" -- who accused my late father of raping him in 19 the Carlton Club, and here we have a number of "Nicks".</p> <p>20 Now, madam chair, you may have read that I described 21 this, perhaps unkindly, you may think, as a kangaroo 22 court, and I did so not out of disrespect, but because, 23 in 40 years of working for justice in the criminal 24 justice system, I have never come across such a patently 25 unfair process; a process which risks damaging the</p> <p style="text-align: center;">Page 40</p>

<p>1 reputation of my late father, my good name, my sister's                  2 good name, my grandchildren's good name, and, may I add,                  3 the important work of your inquiry so far, because, and                  4 there is no getting away from this, he is the only                  5 individual -- I see Mr Altman talking, but I have to                  6 address this -- singled out to a strand of his own. The                  7 Janner strand. He is not an institution, madam chair.                  8 Why, we ask, was this innocent man picked on?                  9 Why was he, an individual, singled out for                  10 a three-week hearing of allegations with no right of                  11 reply; someone of impeccable character; someone who was                  12 never asked to answer the allegations in a court of law;                  13 someone who was a leader of the Jewish community,                  14 a devoted public servant, husband, father and                  15 grandfather, but never an institution.                  16 He founded institutions, madam chair. He founded                  17 the Holocaust Educational Trust; he founded the Jewish                  18 Commonwealth Council, and he was the lay leader, and we                  19 are so proud of this, of the Jewish community in this                  20 country.                  21 You may not intend it -- I'm not suggesting for                  22 a moment you have or will intend it -- but this strand                  23 actually is a gift to the Jew haters and anti-Semites.                  24 Can I deal with one or two of Mr Altman's opening                  25 submissions? The hearing of this strand will inevitably</p> <p style="text-align: center;">Page 41</p>	<p>1 rest on a presumption of guilt. It is an assumption of                  2 guilt. The public would rightly ask: why else devote                  3 a whole strand to this individual if he wasn't guilty?                  4 No smoke without fire. This offends what we in this                  5 room know to be the golden thread of British justice:                  6 innocent until proven guilty.                  7 Now, the public may well also question the need for                  8 the strand. How is this strand going to inform the                  9 inquiry beyond the other strands and the case studies                  10 you have heard? Is it actually proportionate, given the                  11 two-year IOPC investigation? The media will question,                  12 certainly, albeit incorrectly, whether the true                  13 beneficiaries of this strand continuing are the                  14 so-called "gravy train lawyers" totting up the hours                  15 with huge disclosure material, given the massive cost of                  16 hiring teams of lawyers at the taxpayers' expense.                  17 We fear that the hearing, despite your skill, will                  18 inevitably turn into a show trial, a macabre show trial,                  19 against a dead man who cannot answer these allegations                  20 back from his grave.                  21 Now, it goes even further than that, because we, the                  22 family, have been denied the right to cross-examine. So                  23 we cannot test the evidence. Mr Friedman, on the                  24 family's behalf, cannot cross-examine these witnesses.                  25 But we have got the material to deploy. There has been</p> <p style="text-align: center;">Page 42</p>
<p>1 an allusion to this already this morning. We have the                  2 material. Yet, we can't do it. Our hands are tied                  3 behind our backs. We cannot do it in cross-examination,                  4 and it is a basic right, as we see it, denied. So this                  5 isn't an inquisitorial system from the family's point of                  6 view; this is a bewildering, Kafkaesque system,                  7 madam chair.                  8 Now, this failure is acute, given -- and let's not                  9 forget this -- you're dealing with events decades ago.                  10 What hope is there of achieving accuracy?                  11 Madam chair, at the request of the solicitors, we                  12 provided a list of 80 potential key defence witnesses                  13 which would establish the truth, and we did it, as                  14 I say, at your request, but no-one has been asked for                  15 a statement, not one. Yet, as we have heard from                  16 Mr Altman this morning, you still hold out the prospect                  17 of making findings of fact on the allegations. It is                  18 still an open question. That is despite the purported                  19 change in the terms of reference. The changed terms of                  20 reference claim to deal with the institutional reactions                  21 to the allegations, but how does fact finding, still                  22 a prospect, assist with that?                  23 So we ask: are you really comfortable making                  24 findings of fact on disputed allegations in a complex                  25 case like this with so much disclosure left outstanding</p> <p style="text-align: center;">Page 43</p>	<p>1 and with no cross-examination? Doesn't it actually                  2 contradict public statements made by you, madam chair,                  3 and I quote what you said publicly in May 2018? You                  4 said the function of the inquiry "is to investigate                  5 institutional failings and not to determine facts on                  6 individual cases". So why, after four years, are we, as                  7 a family, still hearing that this prospect, first aired                  8 by Mr Emmerson, is still potentially a live issue?                  9 Now, madam chair, many who have made these false                  10 allegations have had their chance. They have claimed --                  11 and we have read it in the papers and we have seen it in                  12 submissions -- that this is all about their chance for                  13 justice. But I repeat: they had their chance for                  14 justice because there were 13 issued civil claims, nine                  15 in the High Court, and they were all dismissed or                  16 withdrawn -- every single one. What about the                  17 limitation period? It's been raised in submission. The                  18 limitation period was not the reason for the withdrawal,                  19 because everyone knew from the word go, from our reply                  20 to those letters, that limitation would be an issue at                  21 trial.                  22 The real reason was that the executors of the estate                  23 made it abundantly clear to all the false complainants                  24 that they would be challenged in cross-examination on                  25 each and every claim on the evidence, and at which point</p> <p style="text-align: center;">Page 44</p>

<p>1 the claims disappeared, madam chair.                  2 It doesn't end there. Many others threatened with                  3 letters before action. They, too, declined to have                  4 their evidence tested in court. Remember, madam chair,                  5 we are dealing with the lowest standard of proof here.                  6 We are dealing with the standard of proof in civil                  7 proceedings. So they also declined to be tested in                  8 cross-examination, knowing we would have fought their                  9 false allegations tooth and nail. They lost and the                  10 estate has, of course, been distributed.                  11 These civil claims also, in my respectful submission                  12 to the panel, reveal the motive for many of the false                  13 allegations: money. Just like Carl Beech: money. Money                  14 in civil claims. It doesn't end there.                  15 Please do not forget, madam chair and your panel,                  16 the Criminal Injuries Compensation Scheme. Money from                  17 the Criminal Injuries Compensation Scheme. We seek                  18 disclosure -- it won't take very long -- of all those                  19 core participants who have made applications under the                  20 statutory scheme. Surely this disclosure should be top                  21 of your list?                  22 We then have the list of core participants. Most                  23 benefit from anonymity. Now, what you are going to be                  24 doing is you are going to be handing them a mic,                  25 a microphone, to come out with damaging claims, and here</p> <p style="text-align: center;">Page 45</p>	<p>1 is the thing, madam chair: remaining forever in your                  2 transcript on the internet for all time.                  3 Can I give you a taste -- just bear with me, I won't                  4 be long -- of the material upon which we would seek to                  5 cross-examine, constrained though I am and, of course,                  6 constrained as I will be by the inquiry's orders on                  7 anonymity. I hope the press pick this up.                  8 One claimed my late father sexually abused him in                  9 the company of a Conservative Cabinet Minister --                  10 a Conservative Cabinet Minister. In his statement to                  11 the police, and I quote, "There was X, the Cabinet                  12 Minister", who I shall not name, "He always came with                  13 Greville". He then goes on to describe how the two of                  14 them sexually abused him. Now, madam chair, my father                  15 was charged on this, on this allegation. It was one of                  16 the charges -- actually, I think it was about three of                  17 the charges referred to by Mr Altman. The Conservative                  18 Cabinet Minister is alive and he is very well known.                  19 The allegation that my late father, a Labour MP, should                  20 join in with a Tory Cabinet Minister is simply                  21 preposterous. How were the police taken in? I suppose                  22 they were just like in Operation Midland. But,                  23 I repeat: it is absolutely preposterous.                  24 Another accuser specified dates when he was raped                  25 and tortured for a whole weekend. He was charged on</p> <p style="text-align: center;">Page 46</p>
<p>1 this too: rape and torture for a whole weekend. This                  2 gentle, loving, innocent person. That was the                  3 allegation. The dates are 16 August to 19 August 1997.                  4 He was charged on this one too. But, madam chair, it so                  5 happens he was in Australia. Yet the police never asked                  6 me -- I had power of attorney -- for his passport.                  7 I had no idea this was coming. The first thing we ever                  8 saw about -- for months, the only thing we ever saw was                  9 a search warrant. Now, I have sent it to you. I have                  10 got it here if any of the press wish to see it, I have                  11 got copies of the passport. I will happily hand it to                  12 them afterwards when I do the interviews. Would you                  13 like to see it, madam chair, now, or later? I have sent                  14 it in. Would you wish to see it now, the passport?                  15 THE CHAIR: No.                  16 MR JANNER: I will hand it in again if it has got lost in                  17 the other material. But I have sent it in along with                  18 a vast amount of other exculpatory material, and that                  19 material, again, was sent to you specifically at the                  20 request of the solicitors to the inquiry.                  21 Now, another false complainant recently jumped on                  22 the infamous -- this is quite an easy one to jump on;                  23 Dolphin Square -- Dolphin Square rumours to allege that                  24 he was raped there. You have given core participant                  25 status to this person.</p> <p style="text-align: center;">Page 47</p>	<p>1 Now, madam chair, we are given to understand that                  2 these false accusers were all, or nearly all, in care                  3 homes as youngsters. Here is the thing: not one made                  4 any complaint, when in care, against my late father.                  5 Not one.                  6 There is no complaint in any social service file                  7 from any complainant, as has been confirmed publicly by                  8 Assistant Commissioner Butler. So this isn't a case of                  9 cries unheard; it is actually a case of strong evidence                  10 inconsistent with false allegations.                  11 Madam chair, in 1991, as I think you know, my father                  12 was falsely accused during the Beck trial. Did any of                  13 the accusers come forward in 1991 or 1992 or for years                  14 and years when adults? They did not. The police took                  15 hundreds of statements during the course of                  16 investigating Beck -- hundreds. It obviously led to the                  17 Kirkwood Inquiry. We haven't heard anything about that                  18 yet. It is meant to be a major theme of your -- a whole                  19 strand of this strand is meant to do with Kirkwood. You                  20 are going to hear from the retired High Court judge and                  21 Lady Justice of Appeal who dealt with it. But,                  22 madam chair, true allegations were made against Beck.                  23 None, save for Beck's friend, madam chair, and defence                  24 witnesses, made any allegation. Again, we know this                  25 from Assistant Chief Constable Butler.</p> <p style="text-align: center;">Page 48</p>

<p>1 Madam chair, my other sister, Laura, apologises --                  2 she is in Auschwitz, as it happens, and apologises to                  3 you for not being here, but Marion is here, and we, the                  4 three of us, remember well the only accuser with whom my                  5 late father had any association. It was important,                  6 madam chair, to both our mother and father to show                  7 kindness and hospitality, especially to those less                  8 privileged than us. We can give first-hand evidence --                  9 I will repeat that, because I don't want to be lost on                  10 the point -- we can give important, first-hand evidence                  11 as to why we know he lied. I, madam chair, can give                  12 first-hand evidence as to why he lied. Yet the                  13 Leicestershire Police, hidden behind me behind a column,                  14 have never contacted us, or me, for a statement. And                  15 nor have you. Nor has the IOPC. Nor did                  16 Sir Richard Henriques, for that matter.                  17 Indeed, Sir Richard never contacted us before his                  18 report and, from the statements he has subsequently made                  19 in public, it seems he was not provided with important                  20 material, material which might have affected his report                  21 and conclusions. So Mr Altman was right, with respect,                  22 to refer to that.                  23 In truth, madam chair, this controversial and now                  24 beleaguered strand will not add to inform your work or                  25 conclusions. You have had 13 strands, or will have had</p> <p style="text-align: center;">Page 49</p>	<p>1 by October, strands dealing with institutions and not an                  2 individual, one who died innocent. If, madam chair, you                  3 and your panel were serious about fairness, why not                  4 follow the suggestions made by many in the press, and we                  5 will continue to do so, of replacing the strand with                  6 a falsely accused strand?                  7 So, instead, we are faced with a knee-jerk reaction                  8 of one of your predecessors, Judge Goddard -- because it                  9 wasn't your decision, it was hers -- and Ben Emmerson in                  10 the aftermath of Savile. And we know why: because my                  11 late father, at that stage, was seen as an early hit.                  12 Let's not forget, please, that this was the first                  13 listed strand. But, actually, it's turned out, at the                  14 very least, he may be innocent, as anyone reading the                  15 material will know. So now we are we? The February                  16 hearing, obviously, as a matter of law, can't go ahead.                  17 It would be completely ludicrous if it were to go ahead,                  18 for the reasons that have been eloquently submitted                  19 already. But what we say on behalf of the family is,                  20 this is a disgrace. You should be ashamed of yourselves                  21 because it is a travesty of justice and it is,                  22 madam chair, I am afraid to say, an affront to fairness.                  23 Can I assist any more with my submissions?                  24 THE CHAIR: No, thank you, Mr Janner.                  25 MR JANNER: Thank you.</p> <p style="text-align: center;">Page 50</p>
<p>1 THE CHAIR: Mr Friedman?                  2 Submissions by MR FRIEDMAN                  3 MR FRIEDMAN: Thank you, madam chair. As you know,                  4 I represent Ms Marion Janner OBE and Senior Rabbi                  5 Laura Janner-Klausner, and Lord Janner was their father.                  6 Can I deal with two matters, please: first, the                  7 recommendation of your counsel to cancel the fixture for                  8 substantive hearings in February 2020, and, second, and                  9 if that recommendation is accepted, how the inquiry                  10 should case manage the consequences of the cancellation.                  11 Those consequences include, I think it is fair to                  12 say, the first concrete acknowledgement by your counsel                  13 and your solicitor that the substantive hearings might                  14 not be able to proceed at all, and that is surely                  15 a dramatic potential change of circumstances that                  16 rightly needs ventilation in public today.                  17 Transparency is especially important, given how long                  18 the investigation has lasted and the impact it has had                  19 on all the Janner family. It constitutes an agonising                  20 interference with their private and family lives, it                  21 harms the name they share with their father, and it                  22 compounds the grief that they are going through as                  23 a result of his death and his treatment as he was dying,                  24 grief which they cannot begin to complete until this                  25 process has ended.</p> <p style="text-align: center;">Page 51</p>	<p>1 Can I turn then to cancellation of the February                  2 fixture, which you know we don't oppose, but it's                  3 important to underscore the reasons why.                  4 It concerns a final hearing that was once published                  5 to begin in September 2016. It was then moved                  6 to March 2017. When adjourning the investigation to                  7 make way for the IOPC, it was still predicted by you,                  8 madam, in the chair, to complete within 2018, only to be                  9 fixed for February 2020, which it is now clear could not                  10 go ahead, for the very reasons that the investigation                  11 was adjourned in April 2017.                  12 Some four and a half years since the start of                  13 the IICSA investigation, there has been no disclosure at                  14 all by the inquiry of any documents to any core                  15 participants, including the allegations upon which the                  16 investigation is founded upon. No-one knows what                  17 purported institutional failings will be considered.                  18 No-one knows what allegations against Lord Janner will                  19 be publicly aired and, likewise, no-one knows about the                  20 detail of material presently in the possession of                  21 the inquiry, or easily available to it, that might                  22 reasonably demonstrate that Lord Janner has been wrongly                  23 accused.                  24 Once disclosed to core participants, no-one knows                  25 how the investigation will test the credibility of</p> <p style="text-align: center;">Page 52</p>

<p>1 allegations, if at all, including how evidence will be 2 deployed, to what end, and under what due process; 3 protections against unfairness.</p> <p>4 A preliminary hearing to consider these and other 5 matters was due to be conducted in May of this year and 6 then today. On the previous timetable, if that 7 preliminary hearing was effected today, then it would 8 have taken place five months before the listed February 9 hearing. However, your solicitor to the inquiry has 10 since advised you in writing, as of 30 April 2019, that 11 if a hearing is to take place at all, it now requires 12 seven months of preparation and not the previously 13 planned five, between a determination by you regarding 14 the final scope and process of the investigation and the 15 start of the hearing itself. Your solicitor adds that 16 the hearing must be completed within the month 17 of October 2020, neither before nor after, and 18 notwithstanding the Jewish festivals that will occur 19 between -- it should say in our note "19 September 20 through to 11 October".</p> <p>21 Your legal team adopt three further positions. 22 First, they propose no disclosure at all of any 23 documents until the completed consequences of the IOPC 24 investigation. Secondly, until that completion, they 25 maintain that the inquiry itself cannot conduct any of</p> <p style="text-align: center;">Page 53</p>	<p>1 its own investigations of any witnesses relating to what 2 it accepts to be the core of this case, namely, the 3 response of the criminal justice institutions to the 4 complaints of sexual abuse. Hence Mr Smith accepts that 5 the bulk of the inquiry's investigation has been 6 unavoidably suspended since April 2017.</p> <p>7 Third, your legal team give warning that, even if 8 there are to be no criminal proceedings concerning 9 a single charge against an individual officer in 10 relation to one matter, there are still reasons, that 11 they cannot disclose today, as to why the investigation 12 may not have time to fairly or justifiably complete.</p> <p>13 It is hardly surprising, therefore, that this family 14 could not object to the cancellation of the February 15 hearing. Your own advisors are publicly warning, in no 16 uncertain terms, for reasons which are presently not all 17 disclosable, that no-one could fairly or effectively 18 even participate in a discussion about the future of 19 these proceedings, including whether they should 20 continue at all, let alone be properly involved in the 21 examination of substantive issues.</p> <p>22 To that we would add our respectful disagreement 23 with those representatives for core participants who 24 today argue for a parallel or alternative sequence. 25 They are wrong to cite inquest or inquiry proceedings</p> <p style="text-align: center;">Page 54</p>
<p>1 where no decision to charge has been taken or was 2 imminent; for instance, Grenfell Tower or Hillsborough. 3 That would not be a correct analogy with the present 4 facts. All the more so because, in both examples given, 5 the police declared an intention to refrain from making 6 charging decisions until the end of the inquisitorial 7 proceedings. More importantly, no-one here today can 8 assess what risk arises to potential criminal 9 proceedings without knowing the nature of the case and 10 no-one will know that without seeing the Operation Nori 11 report and any consequential decision of the Crown 12 Prosecution Service.</p> <p>13 The inquiry team make two further observations which 14 are obviously significant. First, they say that if the 15 CPS do decide the prosecute, then IICSA, as a hearing, 16 cannot proceed because it could never begin in the time 17 available.</p> <p>18 Second, your counsel stressed that if the CPS do not 19 make a decision either way by 6 January 2020, then the 20 time available would also be too little, too late. It 21 would not allow for the disclosure prior to, and as 22 a precondition for, an effective planning hearing 23 in February. Consequently, those seven months of 24 preparation, identified by Mr Smith as necessary before 25 a final hearing can take place, would be lost, all other</p> <p style="text-align: center;">Page 55</p>	<p>1 matters being equal.</p> <p>2 If I turn to the consequences of cancellation for 3 the future of the investigation as a whole, it is clear, 4 however, that all other matters are not equal. First, 5 your advisors are well placed to judge the length of 6 time a prosecution would take. They are equally well 7 placed to doubt, until the CPS confirms otherwise -- and 8 Mr Brown has not done so today -- that a 200-page report 9 that took two years to write, based on 100 pages of 10 evidence, will result in an independent prosecutorial 11 decision by 6 January 2020.</p> <p>12 Second, the date of a publicly promulgated CPS 13 decision not to prosecute is not necessarily the end of 14 the delay that has hitherto postponed the inquiry. That 15 is because the ability to progress the Janner 16 investigation without tainting hypothetical criminal 17 charges would only arise after the exhaustion of 18 remedies available to those who might disagree with 19 either a CPS decision not to prosecute and/or an IOPC 20 decision not to recommend charges against the same or 21 other officers. Neither of those challenges would 22 complete quickly.</p> <p>23 The third consequence. There is the volume and 24 complexity of outstanding disclosure. You will have 25 seen in the notes prepared today that there are</p> <p style="text-align: center;">Page 56</p>

<p>1 200,000 pages previously supplied by other parties, and                  2 100,000 pages now supplied by the IOPC and, in                  3 correspondence with the inquiry before today's hearing,                  4 we are told that the total within the inquiry's                  5 possession at the moment is 355,000 documents. Even if                  6 there is duplication and irrelevant materials, those                  7 figures put this investigation into a different category                  8 to any of the IICSA investigations described on your                  9 website and so shown in the published reports so far.                  10 If I can use shorthand by way of example, Rochdale                  11 disclosed to core participants 19,000 documents;                  12 custodial institutions, 25,000 documents; Nottingham                  13 Council 45,000 documents; Diocese of Chichester, 57,000.                  14 Of all those investigations, we do not understand,                  15 regardless of the names that were mentioned by Mr Altman                  16 today, that the truth of the underlying allegations were                  17 seriously contested by core participants, let alone an                  18 interested family, or that the investigation had cause                  19 to consider material that might reasonably test the                  20 credibility of those allegations.                  21 The situation with the Janner investigation is                  22 starkly different. Just to give the headlines that we                  23 will return to, seven -- not four -- police                  24 investigations; two police complaints investigations.                  25 This is the second statutory inquiry. Civil proceedings</p> <p style="text-align: center;">Page 57</p>	<p>1 settled en masse with regard to Leicester care home                  2 residents in the 1990s. All known civil proceedings                  3 dismissed or withdrawn against the Janner estate. Two                  4 judicial reports by Sir Richard Henriques, both now                  5 requiring an audit of what he was shown and whether or                  6 not there is a relationship between the two, including                  7 how he approached his evaluation of the criminal justice                  8 institutions.                  9 Then there is uncertainty, not overlooked by council                  10 to the inquiry, of a range of matters relating to scope                  11 and process. There are still six planning issues which                  12 counsel have agreed must be determined as soon as                  13 possible, but subject to the self-denying ordinance that                  14 the IOPC report and underlying documentation must first                  15 be read. Those issues are summarised at paragraph 36.4                  16 of counsel's note for today, and we have foreshadowed                  17 our outline arguments on those issues in our written                  18 document for what must now be for another day.                  19 We obviously wish to be heard, as others would as                  20 well, on any other legal matters raised by core                  21 participants. As Mr Altman emphasises, and we agree,                  22 all of that must be dealt with in a fair and structured                  23 way when more information is available. The essential                  24 point is that none of these matters are any longer                  25 amenable to wait and see. The luxury of time has gone</p> <p style="text-align: center;">Page 58</p>
<p>1 and the answers that the inquiry is minded to give will                  2 have existential consequences or such consequences as to                  3 markedly transform the value of the case studying                  4 purpose identified as the reason to continue this                  5 investigation by the chair's determination                  6 of April 2017.                  7 Two arguments have been raised for today's hearing                  8 as to why the inquiry must say now that it will never                  9 discontinue. Both, with respect, are incorrect.                  10 First, it would be wrong for IICSA to conclude as                  11 a matter of law that it is mandated to continue with                  12 this strand, come what may, by article 3 of the ECHR.                  13 In relation to your sister inquiry in Northern Ireland,                  14 the Historical Institutional Abuse Inquiry, the Court of                  15 Appeal in the case of Hoy has expressly ruled against                  16 that argument. But as regards Lord Janner himself, no                  17 such mandate can conceivably exist in relation to him,                  18 because neither criminal nor civil proceedings are                  19 possible against the man or his estate. There is also                  20 no automatic duty under the Human Rights Convention, to                  21 investigate a failure to investigate.                  22 But even if there was, the IOPC, and now the CPS,                  23 will apparently do so, and the result awaits analysis.                  24 Equally, there can be no common law legitimate                  25 expectation to continue to investigate because IICSA has</p> <p style="text-align: center;">Page 59</p>	<p>1 somehow promised to do so. No such promise has been                  2 made. And paragraph 40 of your determination                  3 of April 2017 we agree, amongst other things, is                  4 essential because you committed there to keeping under                  5 review the continuance of the investigation itself.                  6 Finally, may I mention human cost? That may be                  7 pleaded by others, but I focus here on this family.                  8 During its lifetime, IICSA has rightly made statements                  9 about its concern to protect the dignity of vulnerable                  10 witnesses that have made complaints. It has said much                  11 less about the predicament of the accused, especially                  12 where there is a credible prospect that they have been                  13 wrongly accused.                  14 Put another way, the inquiry has shown a commitment                  15 to the value of a complainant's right to be heard as an                  16 end in itself. That is why there is a discrete way in                  17 which the inquiry will hear from any person who                  18 considers themselves to be a victim or survivor of child                  19 sexual abuse who wishes to share their experience via                  20 the Truth Project. That is a function that does not                  21 bear upon the dignity or the reputation of others and                  22 bears no countervailing right to reply. However, once                  23 a complaint enters into the subject matter of a public                  24 investigation, there is inevitably a conflict between                  25 protecting those who make apparently credible complaints</p> <p style="text-align: center;">Page 60</p>

<p>1 as against those who are denied the right of prompt, 2 fair and effective, credible challenge. 3 This is not a competition between indignities, but 4 it is also right to emphasise that it is not a situation 5 where human rights flow one way. Within the 6 institutional setting of IICSA itself, the accused and 7 their families are at risk of being treated as the 8 other. The mere event of an accusation against oneself 9 or a person one loves is a trauma in itself. The 10 inquiry has previously justified its examination of 11 institutional responses to the allegations against 12 Lord Janner because it judged it to provide a means to 13 an end of greater understanding about the state's 14 treatment of accusations made against prominent persons. 15 If what the Janner investigation can now achieve is 16 drastically diluted, then the justification requiring 17 its continuance must surely need to be that much more 18 compelling if it is to respect the inherent dignity of 19 all those involved. And all the more so, we say, when 20 there is no prospect of civil or criminal proceedings 21 left against Lord Janner. 22 As a matter of public law, human rights law and 23 simple common decency, it follows that, at the next 24 hearing, the inquiry must determine once and for all 25 whether the investigation is still compliant with its</p> <p style="text-align: center;">Page 61</p>	<p>1 own selection criteria and the relevant statutory test 2 under section 17 of the Inquiries Act, which is to 3 consider matters that bear a practical capacity to 4 proceed in a fair and proportionate fashion in what time 5 is left. 6 There is now, we respectfully submit, manifestly 7 good reason to doubt that to be the case. Madam, thank 8 you. 9 THE CHAIR: Thank you, Mr Friedman. Mr Stanage? 10 Submissions by MR STANAGE 11 MR STANAGE: Chair, may I start by recognising that filial 12 piety is a virtue universally recognised, but so, too, 13 in a legal forum, is objective engagement with the 14 facts. 15 Lord Janner died unconvicted, it is true, but the 16 findings of fact in the report of Sir Richard Henriques 17 of 19 January 2016 serve as an important counterbalance 18 to some of the assertions that have been made today on 19 behalf of the family. 20 Because so much of the press's attention has been 21 sought by Daniel Janner -- and I make no criticism of 22 that -- in the interests of factual accuracy, I would 23 very briefly wish to read three short portions of 24 Sir Richard Henriques' report. At page 43 in his 25 overview, paragraph 5.1, he said this:</p> <p style="text-align: center;">Page 62</p>
<p>1 "I am satisfied that in 1991 there was a sufficiency 2 of evidence for a prosecution to be commenced against 3 Janner for offences of indecent assault and buggery with 4 complainant 1." 5 Second finding, paragraph 5.10, this time in 6 relation to 2002: 7 "Had the statement of complainant 2 been forwarded 8 to the CPS, there was, in my judgment, a sufficiency of 9 evidence to commence a prosecution against Janner in 10 2002 for indecent assault and buggery, both with 11 complainant 1 and complainant 2." 12 Thirdly, chair, paragraph 5.13: 13 "In my opinion, there was sufficient evidence to 14 provide a realistic prospect of conviction in 2007 and 15 Janner should have been arrested and interviewed and his 16 home searched. He should have been charged with 17 offences of indecent assault and buggery with 18 complainant 1, complainant 2 and complainant 3." 19 Chair, much has been said, and fairly said, about 20 the frustration and suffering that arises from delay. 21 It would be remiss of me to fail to make the same point 22 on behalf of the 14 core participants whom I and 23 Slater &amp; Gordon represent. I know this is a point that 24 is echoed in submissions written by those from whom you 25 are also about to hear, but perhaps the plainest point</p> <p style="text-align: center;">Page 63</p>	<p>1 that any of us on behalf of the complainant core 2 participants can make today is that our clients have 3 waited decades. They have waited patiently. They have 4 been ignored in the '90s and in the early decade of this 5 century. Who ignored them? Police, prosecution and 6 council appear to be those institutions upon which most 7 attention and scrutiny must fall. 8 Having been denied the justice of any investigation 9 into their allegations, it is the wish of my clients, at 10 long last, to have you and your colleagues hold only 11 a three-week hearing, or thereabouts, a full public 12 hearing, in which the institutional responses into their 13 complaints can be investigated. 14 Chair, I have said in written submissions, and 15 I don't belabour them orally, but I have emphasised at 16 my paragraph 8.5 that the reality here is not only that 17 so many have waited so patiently for so long, but that 18 the public scrutiny of the allegations and the 19 institutional responses to them has never taken place in 20 any forum. 21 So, chair, without any excitability on my part, 22 I hope, I say, on my clients' behalf, that you and your 23 colleagues offer them the only chance of the public 24 hearings which they deserve and for which they have 25 waited.</p> <p style="text-align: center;">Page 64</p>



<p>1 What is the value of a public hearing at the end of                  2 an investigation where, as we have heard, hundreds of                  3 thousands of documents have been created and no doubt                  4 tens of thousands of hours of legal professionals' work                  5 and investigative professionals' work has been devoted                  6 to the matter? Well, perhaps the question answers                  7 itself. But we say there is inherent value in the                  8 public scrutiny of these matters. I think it was                  9 Bentham who said that sunlight was a great disinfectant,                  10 and that is why, madam, you are holding this hearing in                  11 public, so many other hearings have been heard in                  12 public, and it is because behind closed doors no justice                  13 can be seen to be done, and an extensive and lengthy                  14 series of investigations that fail to culminate in any                  15 public hearing could only, in my respectful submission,                  16 generate disquiet, suspicion and a complete devastation                  17 to the trust and confidence that has been built up                  18 between the investigation and its complainant core                  19 participants.                  20 Chair, we ask you, albeit that we are, as core                  21 participants, in the dark as to the nature of the report                  22 by the IOPC, the content of the 355,000 documents, we                  23 ask you, nonetheless, that there should be a presumption                  24 in favour of public scrutiny and of public hearing.                  25 I said a moment ago "we ask for", indeed, it is not</p> <p style="text-align: center;">Page 65</p>	<p>1 that we ask for it, your team has suggested that the                  2 likely length of such hearings would be in the order of                  3 three weeks. What on earth difficulty can there be in                  4 giving to the complainant core participants a three-week                  5 window at some point in October of next year when one                  6 weighs against that the very heavy and lengthy nature of                  7 all of the investigations to date? We say, with great                  8 respect, it would not merely be a disappointment for you                  9 to discontinue and abandon the procedure before any                  10 public hearing; it would be devastating and ludicrous.                  11 Madam, we finished our written submissions with                  12 reference to a House of Lords case in Amin,                  13 acknowledging, of course, that it was in different                  14 circumstances and relating to an inquest. But we do ask                  15 you to consider that the dicta of the House of Lords has                  16 great relevance to the nature and purposes of your own                  17 inquiry. In Amin, at paragraph 31, the House of Lords                  18 observed, in respect of public investigation into                  19 a cause of death, that the purposes of such an                  20 investigation are clear: to ensure, so far as possible,                  21 that the full facts are brought to light; that culpable                  22 and discreditable conduct is exposed and brought to                  23 public notice; that suspicion of deliberate wrongdoing,                  24 if unjustified, is allayed; and that dangerous practices                  25 and procedures are rectified.</p> <p style="text-align: center;">Page 66</p>
<p>1 Chair, we ask you to remain true to an investigation                  2 that seeks to pursue those aims and objectives by                  3 proceeding to a public hearing as soon as possible.                  4 On the issue of disclosure mentioned by two of my                  5 learned friends already this morning, we can only add,                  6 with the greatest emphasis, that it is not because we                  7 are totting up the hours, as my learned friend                  8 Daniel Janner, perhaps in a moment of flourish,                  9 suggested to you; it is because the disclosure in this                  10 case is the key to it. The disclosure will show whether                  11 we are on the right track or not. Disclosure, and full                  12 disclosure, at the earliest opportunity, will maximise                  13 fairness to all concerned, and so that, as a practical                  14 next step, is what we urge upon you. Thank you very                  15 much.                  16 THE CHAIR: Thank you, Mr Stange. Mr Jacobs?                  17 Submissions by MR JACOBS                  18 MR JACOBS: Madam chair, thank you. I appear for F54,                  19 instructed by Howe &amp; Co, and also for E1, Tracey Taylor,                  20 Timothy Betteridge and E4, instructed by Affinity Law.                  21 Chair, we rely on our written submissions before the                  22 panel; the submissions by Howe &amp; Co on behalf of F54 in                  23 response to proposals to delay or discontinue this                  24 investigation, dated 16 September 2019, and the                  25 submissions advanced by Affinity Law, also dated</p> <p style="text-align: center;">Page 67</p>	<p>1 16 September 2019, effectively supporting the position                  2 of Howe &amp; Co, and setting out the very strong concerns                  3 of their clients in relation to the suggestion that this                  4 investigation might be discontinued.                  5 For completeness, I should clarify a point raised by                  6 Mr Altman earlier about civil claims. Contrary to what                  7 we have heard this afternoon, the claims have not                  8 disappeared. Affinity Law have brought four claims in                  9 the High Court against Leicestershire County Council,                  10 they are currently before the court at interlocutory                  11 stages. I say that this has no bearing on this process                  12 because of the effect of section 2 of the Inquiries Act                  13 2005.                  14 In relation to delay, which is a substantial issue                  15 for those whom I represent, and no doubt for the                  16 majority of the complainant core participants in this                  17 inquiry, I ought to set the context. I have been                  18 referred by those who instruct me this morning to the                  19 transcript from 9 March 2016. I believe it was the                  20 first ever hearing of this inquiry. The reference is                  21 page 4, lines 9 to 16, where Ben Emmerson QC, in his                  22 opening investigations in the preliminary hearing, said:                  23 "The Janner investigation -- and I mean no                  24 disrespect by using that term -- has been identified for                  25 an early hearing, partly in recognition of the length of</p> <p style="text-align: center;">Page 68</p>

<p>1 time the complainants in this matter have had to wait                  2 before their allegations could be heard. The Janner                  3 investigation is one of four investigations in which                  4 preliminary hearings are being heard this month and in                  5 which early public hearing of the evidence are                  6 expected."                  7 So right from the very outset of this inquiry                  8 process, it was always intended that because these                  9 complainant core participants have had to wait so long                  10 for the scrutiny of the relevant institutions, that this                  11 was going to be, in effect, expedited. And here we are,                  12 three and a half years down the line, still worrying                  13 about disclosure and the possibility that the                  14 investigation might not take place at all.                  15 As Mr Stanage has just told you, it has never                  16 happened for the complainant core participants that the                  17 institutions that failed them have been publicly brought                  18 to account. So I need to address you on the future                  19 conduct of the investigation, and, in particular, the                  20 threat of discontinuation.                  21 We invite you, chair, to make a positive ruling in                  22 the determination arising from today that this                  23 investigation will not be discontinued. It is not                  24 correct to say, if it is indeed now said, that this                  25 hearing is limited only to whether the February hearings</p> <p style="text-align: center;">Page 69</p>	<p>1 should proceed or not. The issue as to whether this                  2 investigation can continue at all is raised as a live                  3 point in counsel to the investigation's note for today's                  4 hearing. Mr Friedman has referred to the issue this                  5 afternoon in his submissions.                  6 I refer you to paragraph 39 of counsel to the                  7 investigation's note, where it is said:                  8 "We note that unless the CPS takes a decision by                  9 early 2020 not to bring any charges, then there will be                  10 considerable uncertainty as to when any future hearings                  11 in this investigation could possibly be held."                  12 Now, that has caused great concern to my clients.                  13 What is said in this note is foreshadowed by                  14 paragraph 36.4.1:                  15 "If the chair decides that the investigation is to                  16 continue ..."                  17 Now, the reasons for discontinuation, or the threat                  18 of discontinuation, appear to be threefold. Firstly,                  19 one unidentified individual may or may not be prosecuted                  20 which might impact on the evidence available to the                  21 investigation.                  22 Secondly, the inquiry wishes to conclude its                  23 hearings by November 2020 and publish a final report                  24 by March 2022.                  25 Thirdly, the Henriques Report and, it is said, the</p> <p style="text-align: center;">Page 70</p>
<p>1 report of Operation Nori cover the same ground.                  2 We submit that these points go nowhere near to the                  3 establishment of a rational justification for putting                  4 a stop to this important investigation. We have put                  5 forward numerous reasons in our submissions, but, for                  6 the purposes of what I have to say today, the following                  7 are pertinent.                  8 Firstly, I must say that all my clients have                  9 invested heavily in this process. It is right and it's                  10 been accepted and acknowledged that a fundamental                  11 purpose of public inquiries is catharsis for victims and                  12 survivors of institutional failures.                  13 Secondly, many of my clients are still suffering                  14 from the trauma relating to the abuse that they suffered                  15 as children and subsequent institutional failings in                  16 relation to that abuse. I have taken instructions, and                  17 my clients have told me that they have been advised by                  18 their mental health workers that they will not be able                  19 to start the healing process until after they have                  20 obtained the necessary closure from this process. So                  21 this is an important cathartic process in relation to                  22 the mental health issues, and that must be considered                  23 when looking at whether this investigation can be                  24 discontinued.                  25 Most of my clients have put their lives on hold in</p> <p style="text-align: center;">Page 71</p>	<p>1 the very real expectation that they will achieve this                  2 closure. F54 provides an example -- we have referred to                  3 it in our submissions -- and he has cancelled planned                  4 surgery to attend IICSA hearings.                  5 I submit that if this strand were to be                  6 discontinued, the reputational damage to the inquiry                  7 would be substantial. Here we have an investigation                  8 which centres on the failure of institutions to respond                  9 adequately to protect children and to investigate                  10 allegations of abuse where those allegations arise from                  11 those who have high political profiles or are public                  12 figures. The perception by victims and survivors is                  13 that there is a certain category of individual who is                  14 above the law and above scrutiny. Failing to scrutinise                  15 this issue now, pulling back after three and a half                  16 years, will only serve to exacerbate that perception.                  17 I submit that if this investigation were to be                  18 discontinued, complainant core participants across the                  19 investigation would lose faith in the inquiry process                  20 and victims and survivors, it is very likely, would no                  21 longer wish to come forward and participate in the                  22 process. Legal representatives will no longer be able                  23 to persuade their clients that any such faith in the                  24 process would be repaid or justified. So discontinuing                  25 this strand would fundamentally undermine the whole</p> <p style="text-align: center;">Page 72</p>

<p>1 inquiry process, in my submission.                  2 It's stated in our written submissions that there is                  3 nothing new about concurrent proceedings taking place                  4 within an inquiry process, and we have made reference to                  5 what counsel to the investigation told you during the                  6 trial of Abbot Soper. That continued and that did not                  7 stop the Ealing Benedictine investigation continuing.                  8 I believe -- I think Soper was convicted on Day 8 of one                  9 of the hearings.                  10 The Grenfell Inquiry proceeds notwithstanding                  11 current Metropolitan Police investigations.                  12 I understand that it has been said by the police that                  13 prosecutions are unlikely before 2021 for Grenfell.                  14 This has not stopped that inquiry proceeding. And the                  15 same applies here, in my submission.                  16 As Simpson Millar point out in their submissions,                  17 the Henriques and Nori investigations say nothing about                  18 Leicestershire County Council and accountability arising                  19 from various social services teams and departments.                  20 We say, importantly, it is simply not necessary now                  21 to delay this matter further, and we have presented what                  22 I submit is a constructive way forward in our written                  23 submissions. I say, notwithstanding what Mr Altman has                  24 told the investigation this morning, that there is                  25 enough evidence to hold the investigation, or part of</p> <p style="text-align: center;">Page 73</p>	<p>1 the investigation, in February 2020 as planned,                  2 certainly in respect of the evidence available from                  3 Leicestershire County Council, the Henriques Report,                  4 which will inform the investigation as to police                  5 failings, to which Mr Stanage has referred.                  6 We have heard today that the inquiry has already                  7 obtained detailed corporate statements from the council                  8 and the police. We have heard today Mr Altman refer to                  9 material from the Kirkwood Inquiry is available,                  10 material from the Metropolitan Police, the Labour Party,                  11 NSPCC and a wide range of potential witnesses. So the                  12 matter can commence in February 2020 and those dates                  13 should be kept open. But also, we submit, if necessary,                  14 keep the proposed October dates open so that further                  15 matters -- when they can be disclosed, when they can be                  16 considered -- can be looked at then. That is a similar                  17 approach to the approach that this inquiry has adopted                  18 in the accountability and reparations strand, where                  19 there has been an investigation and the inquiry has                  20 decided that it needs to look at further issues in more                  21 detail, and we have a new hearing listed for November of                  22 this year.                  23 I say that this is a highly important investigation.                  24 It is not a controversial and beleaguered strand, as we                  25 have heard today. It concerns widespread institutional</p> <p style="text-align: center;">Page 74</p>
<p>1 failings where reports are made concerning an individual                  2 with a prominent political and public profile. I repeat                  3 what I said earlier, that an important issue arises as                  4 to the extent to which institutions -- and it is the                  5 institutions that are being looked at here --                  6 responsible for the protection of children may view                  7 certain categories of individuals as above scrutiny.                  8 My clients, as I said earlier, have waited most of                  9 their lives for institutions that failed to protect them                  10 to be properly scrutinised and brought to account. They                  11 have finally been promised an investigation                  12 in February 2020 and put their lives on hold. I say                  13 they are entitled to a legitimate expectation that this                  14 investigation will proceed. Contrary to what                  15 Mr Friedman has told you, there is no article 3                  16 obligation to frustrate a legitimate expectation. The                  17 fact that the matter was to be kept under review does                  18 not undermine the unequivocal commitment shown to core                  19 participants over three and a half years ago to bring                  20 this important investigation as a strand of the wider                  21 inquiry and, as I have said, it is perfectly possible,                  22 and not at all uncommon, for an inquiry to go ahead and                  23 proceed where there are parallel proceedings. I draw                  24 your attention to what counsel to the investigation told                  25 you in the Ealing investigation, that this is quite</p> <p style="text-align: center;">Page 75</p>	<p>1 normal procedurally in respect of those who are used to                  2 practising in the criminal legal field.                  3 So, finally, there is nothing objectionable -- in                  4 terms of the timing, there is, I submit, nothing                  5 objectionable in publishing an addendum report after                  6 a final report, if circumstances dictate that course of                  7 action. If it is necessary, which I accept it must be,                  8 for recommendations to be put before the government                  9 quickly, that can be done when planned, but there can be                  10 an addendum report on this important strand.                  11 So we invite you, in conclusion, to rule that the                  12 investigation will proceed in February and in October or                  13 beyond if needed. Unless I can assist further, those                  14 are my submissions, chair.                  15 THE CHAIR: Thank you, Mr Jacobs.                  16 MR ALTMAN: Chair, before Mr Chapman rises to his feet, you                  17 will note the time. Ms Leek has notified us that she                  18 would like to say a few more words at some point and                  19 I will have a few things to say in response, all of                  20 which I suspect is about another half an hour of                  21 hearing, and so the question for you is whether you are                  22 happy to continue, eating into the normal lunch break,                  23 or to rise now and come back at 2.00 pm.                  24 THE CHAIR: No, we will continue. Thank you. Mr Chapman?                  25</p> <p style="text-align: center;">Page 76</p>

<p>1 Submissions by MR CHAPMAN                  2 MR CHAPMAN: Chair, panel, we support the submissions of                  3 Mr Jacobs. We oppose the adjournment. We say there                  4 must be substantial proceedings, in full or in part,                  5 in February, and a declaration and assurance to the                  6 complainants that we represent and others that this                  7 aspect of the inquiry will proceed to a full hearing.                  8 If it concludes in October, so be it. But we say there                  9 are three weeks available in February now. If the                  10 number of pages that are to be disclosed really do run                  11 to 350,000 pages, three weeks probably will not be                  12 enough anyway.                  13 In deciding how to deal with Mr Altman's proposals,                  14 we ask this question: what has changed since Mr Emmerson                  15 made his commitment so long ago? It remains a very                  16 important strand of the inquiry: a high-ranking                  17 politician and lawyer facing very serious allegations                  18 that were not, as we know from the Henriques Report,                  19 properly dealt with by the police on at least three                  20 occasions. We also know that it involves Leicestershire                  21 County Council. Any failures by them is the first line                  22 of protection for a child. They were acting in loco                  23 parentis. None of this might have arisen at all if they                  24 had done their work properly. And, of course, it                  25 concerns the Labour Party. We know from another strand</p> <p style="text-align: center;">Page 77</p>	<p>1 of the inquiry that the Liberal Party were scrutinised                  2 in relation to Cyril Smith. So it remains a very                  3 important part of this inquiry. That has not changed.                  4 All that has changed is delay. It cannot be right,                  5 and we say it is unconscionable, that delays by the IOPC                  6 investigating failures by the police should dictate your                  7 timetable in a case where this is all about delay, which                  8 is a tragedy for the complainants we represent, but it                  9 is also a tragedy for the Janner family, who have had to                  10 endure three years of waiting for this preliminary                  11 hearing, where we are told it may not go ahead at all.                  12 You have to weigh that against what is really the                  13 only excuse that's been offered today by counsel to the                  14 inquiry, which is potential prejudice to a criminal                  15 matter. You have not been told the status of                  16 the individual who has been referred. We know it is not                  17 Dr Butler. You have not been told whether this is                  18 a heavy or weighty matter which the CPS is being asked                  19 to review. The CPS will not tell you when exactly they                  20 will take a decision or if they ever will decide to                  21 prosecute.                  22 We urge you to follow the guidance that relates to                  23 civil proceedings, and I have set those out in full in                  24 writing. But the test is quite a simple one: there must                  25 be, and must be demonstrated to be, a real risk of</p> <p style="text-align: center;">Page 78</p>
<p>1 serious prejudice which may lead to injustice.                  2 We have not had any explanation or demonstration of                  3 how that test might be met. The reality is, we suggest,                  4 that the investigation is simply not ready; that despite                  5 there being three years since this investigation                  6 started, we are not ready to proceed in February. We                  7 stand here not having received a single page of                  8 disclosure, when there are 350,000 pages, apparently.                  9 We are being kept in the dark and fed nothing.                  10 It is extremely difficult for any of                  11 the complainants and core participants in this hearing                  12 today to make reasoned submissions when we have nothing,                  13 no traction, no material to bite on, and of course, in                  14 that position, the timetable is dictated by others.                  15 I accept Mr Altman cannot impose a timetable on the CPS,                  16 but it should not be for the CPS to impose a timetable                  17 on you. There must be some compelling reason for this                  18 adjournment that we have not heard. We do not know what                  19 duplication of work will be saved, but it certainly                  20 won't be in relation to Leicester County Council or the                  21 Labour Party.                  22 We do not know what the prejudice to the criminal                  23 proceedings will be, because we have not been told.                  24 When it comes to the welfare of individuals, it is                  25 obvious that further delay is going to prejudice all the</p> <p style="text-align: center;">Page 79</p>	<p>1 people who have a concern in this case, the Janner                  2 family included.                  3 We suggest that there is disclosure that starts                  4 almost immediately, and there should be a rolling                  5 programme of disclosure, and that a decision is made                  6 before Christmas about what aspects could be considered                  7 fruitfully and substantively in February.                  8 Those are my submissions, chair and panel.                  9 THE CHAIR: Thank you, Mr Chapman.                  10 MR ALTMAN: Chair, I was going to suggest that you invite                  11 Ms Leek to address you -- I am sure it won't be very                  12 long -- before I address you finally.                  13 THE CHAIR: Ms Leek?                  14 Submissions by MS LEEK                  15 MS LEEK: Thank you, chair, just very briefly, the chief                  16 constable wishes me to raise the following issues.                  17 As counsel to the inquiry has said, a total of                  18 38 people, excluding Carl Beech, made allegations to                  19 Leicestershire Police about Lord Janner. The first was                  20 made in 1990, during Operation Intern, the investigation                  21 into Frank Beck. In 2015, following a fresh                  22 investigation by Leicestershire Police, a decision was                  23 made by the CPS to charge Lord Janner with 22 separate                  24 offences of sexual crimes against a total of nine                  25 different children. Chair, as Mr Altman has said, none</p> <p style="text-align: center;">Page 80</p>

1 of the charges related to Carl Beech, otherwise known as  
 2 "Nick".  
 3 It should be made clear that Carl Beech made one  
 4 single allegation against Lord Janner to the  
 5 Metropolitan Police Service in 2014. That allegation  
 6 was relayed to Leicestershire Police. The highly  
 7 experienced senior investigating officer made an initial  
 8 investigation of that allegation, as a result of which  
 9 no further criminal investigation was undertaken by  
 10 Leicestershire officers. In short, Carl Beech did not  
 11 feature in any aspect of Leicestershire Police's  
 12 investigation into Lord Janner and the 22 charges  
 13 brought against him. This includes the search of  
 14 Lord Janner's home address, which had no connection with  
 15 the allegations made by Carl Beech.  
 16 Chair, the press have reported and commented upon  
 17 the discontinuance of some of the civil claims which  
 18 were repeated in the hearing this morning. So far as  
 19 the criminal investigations are concerned, the chief  
 20 constable wishes it to be known that none of  
 21 the 38 complainants has retracted the allegations that  
 22 they made to the police and that the discontinuance of  
 23 civil claims against Lord Janner's estate should not be  
 24 taken as any kind of commentary on the strength of  
 25 the criminal allegations that they made, many of which

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1 to withhold disclosure of the report. We have simply  
 2 not been given permission to do so.  
 3 However, as we have said, it doesn't follow that all  
 4 disclosure must await the end of the process by the CPS.  
 5 We will consider carefully what can be disclosed. We  
 6 have only recently been in a position to do so as we  
 7 have only recently learned of which case it is that has  
 8 been referred to the CPS. It is also, can I add,  
 9 a mistake to think that all of the material reviewed by  
 10 the inquiry's legal team will be disclosed, and so it is  
 11 wrong to think that, simply because over 350,000  
 12 documents have been provided to the inquiry, they will  
 13 all be disclosed in due course. Much, of course,  
 14 depends on scope, the issue of relevance is of course  
 15 important in this regard, and, therefore, people  
 16 shouldn't run away with the idea that, because over  
 17 350,000 documents have been provided to us, they are all  
 18 going to be disclosed in due course.  
 19 I add that we are fully aware of our duty of  
 20 fairness, and also aware of the need for focus and  
 21 proportionality. So I hope, to some limited extent,  
 22 that that will set minds at ease.  
 23 It is not documents -- it is pages of documents,  
 24 thank you.  
 25 Chair, the final item on today's agenda is "any

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1 were tested by a number of senior barristers and the  
 2 DPP, who authorised the 22 charges in 2015. Thank you,  
 3 chair.  
 4 THE CHAIR: Thank you, Ms Leek. Mr Altman?  
 5 Submissions by MR ALTMAN  
 6 MR ALTMAN: Chair, the only issue which I feel we need to  
 7 address is the issue of disclosure and the limitations  
 8 on disclosure which I outlined earlier, but perhaps not  
 9 in sufficient detail so that people understand where we  
 10 are and why we are where we are.  
 11 First of all, disclosure has been limited because,  
 12 as I said before, there has simply been no decision on  
 13 the detailed list of issues which we set out in our  
 14 written submissions, and that's because it hasn't been  
 15 possible to hold public hearings on this point due to  
 16 the risk of prejudice to the criminal investigation and  
 17 potential proceedings.  
 18 Secondly, the disclosure in itself could have  
 19 prejudiced the work of the IOPC and the CPS. Indeed,  
 20 the IOPC has informed the inquiry that they would oppose  
 21 disclosure of their material and, indeed, Mr Brown, on  
 22 behalf of the CPS, today has raised concerns about the  
 23 issue of prejudice himself. Therefore, this is not the  
 24 self-denying ordinance that Mr Friedman referred to --  
 25 in other words, that we have taken a unilateral decision

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1 other business". That tends to suggest whether there  
 2 are applications or other submissions from core  
 3 participants. We have heard from Ms Leek. I have not  
 4 been notified of anything else, and, therefore, the  
 5 silence around the room suggests to me that that  
 6 concludes today's proceedings.  
 7 THE CHAIR: Thank you, Mr Altman, and thanks to everybody  
 8 for your submissions today. I will consider them  
 9 carefully and will give a determination in writing in  
 10 due course. Thank you very much.  
 11 (1.15 pm)  
 12 (The hearing concluded)  
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