

IN THE INDEPENDENT INVESTIGATION  
INTO CHILD SEXUAL ABUSE (“IICSA”)

And specifically:

THE INVESTIGATION INTO INSTITUTIONAL  
RESPONSES TO ALLEGATIONS OF CHILD  
SEXUAL ABUSE INVOLVING THE LATE  
LORD JANNER OF BRAUNSTONE Q.C.  
 (“The Lord Janner Investigation”)

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SUBMISSIONS ON BEHALF OF CHIEF  
CONSTABLE MICHAEL CREEDON (“CCMC”)  
(RETIRED)  
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**Introduction**

1. These submissions are made, on behalf of CCMC, for the purposes of the preliminary hearing that is scheduled to take place on 20 February 2020.
2. On 17 January 2020 submissions prepared by Counsel to the Inquiry ("CTI") were served on Core Participants. The view of CTI, as expressed in those submissions, is that, owing to the need to ensure the anonymity of one of the individuals who has alleged sexual abuse by Lord Janner, a hearing into the Lord Janner Investigation will not be able to take place in public. Further, it is the opinion of CTI that a hearing in which certain of the evidence is admitted and considered in closed hearings should not take

place and, therefore, the investigation should be discontinued.

3. These submissions address, on behalf of CCMC, CTT's proposal that the Lord Janner Investigation should be discontinued. The submissions also address the conduct of the preliminary hearing that is scheduled to take place on 20 February 2020.

### The Discontinuance of the Investigation

4.

# Restriction Order

## Restriction Order

In early 2000

CCMC was a Detective Superintendent and then in May 2000 was promoted to a Divisional Commander post with no managerial responsibilities for force major crime investigations. He was promoted to the rank of Temporary Assistant Chief Constable in April 2001. These dates are relevant to the Leicestershire Major Crime investigation known as Operation Magnolia.

5. Throughout his involvement in the various police investigations into Lord Janner, CCMC conducted himself in accordance with the highest professional standards. He has always refuted any allegation of misconduct or impropriety on his part.

6. CCMC remains committed to assisting the Inquiry and is ready and willing to explain in public, before the Inquiry, his role in the various police investigations into Lord Janner. CCMC recognises that there is a significant public interest in ensuring that these matters are considered by IICSA and that the public are provided with a full and independent explanation as to what happened in the various investigations into Lord Janner.
  
7. The only way to satisfy the public interest in this regard, to allay any concerns the public may have and to ensure that the full truth is brought to light is to have a full public hearing. CCMC therefore does not support either of the proposals made by CTI; that the investigation be discontinued or that the hearings be held, partly, in closed sessions. Both suggestions are entirely unsatisfactory for all concerned and for the wider public.
  
8. CTI's opinion is that it will be impossible to have a full public hearing. That is a matter only CTI can properly comment on as only CTI have seen the entirety of the material that, in their opinion, gives rise to a significant risk of 'jigsaw' identification of one of the complainants, if the issues are ventilated in public. Such concerns are not unusual in criminal trials for sexual offences but rarely if ever lead to proceedings not taking place at all.

9. Based on the material available to him, CCMC does not support any proposal, short of a full Inquiry, with all of the evidence heard in public (subject to anonymisation of complainants where necessary). If others, who have access to the entirety of the material relating to the Investigation, conclude that the Investigation must be discontinued or elements held in closed session that is a matter for them, based on their own judgement.

### **The Conduct of the Preliminary Hearing**

10. CTI have requested that CPs provide submissions as to whether parts of the preliminary hearing should be held in private, and if so whether some members of the press should be allowed to attend the closed session. CCMC recognises the importance of the principle of open justice and supports the proposal made by CTI at paragraph 68n of the submissions.

Christopher Daw Q.C.

Austin Welch

7 February 2020