

**IN THE MATTER OF THE INDEPENDENT INQUIRY INTO CHILD SEXUAL ABUSE  
RE: LORD GREVILLE JANNER**

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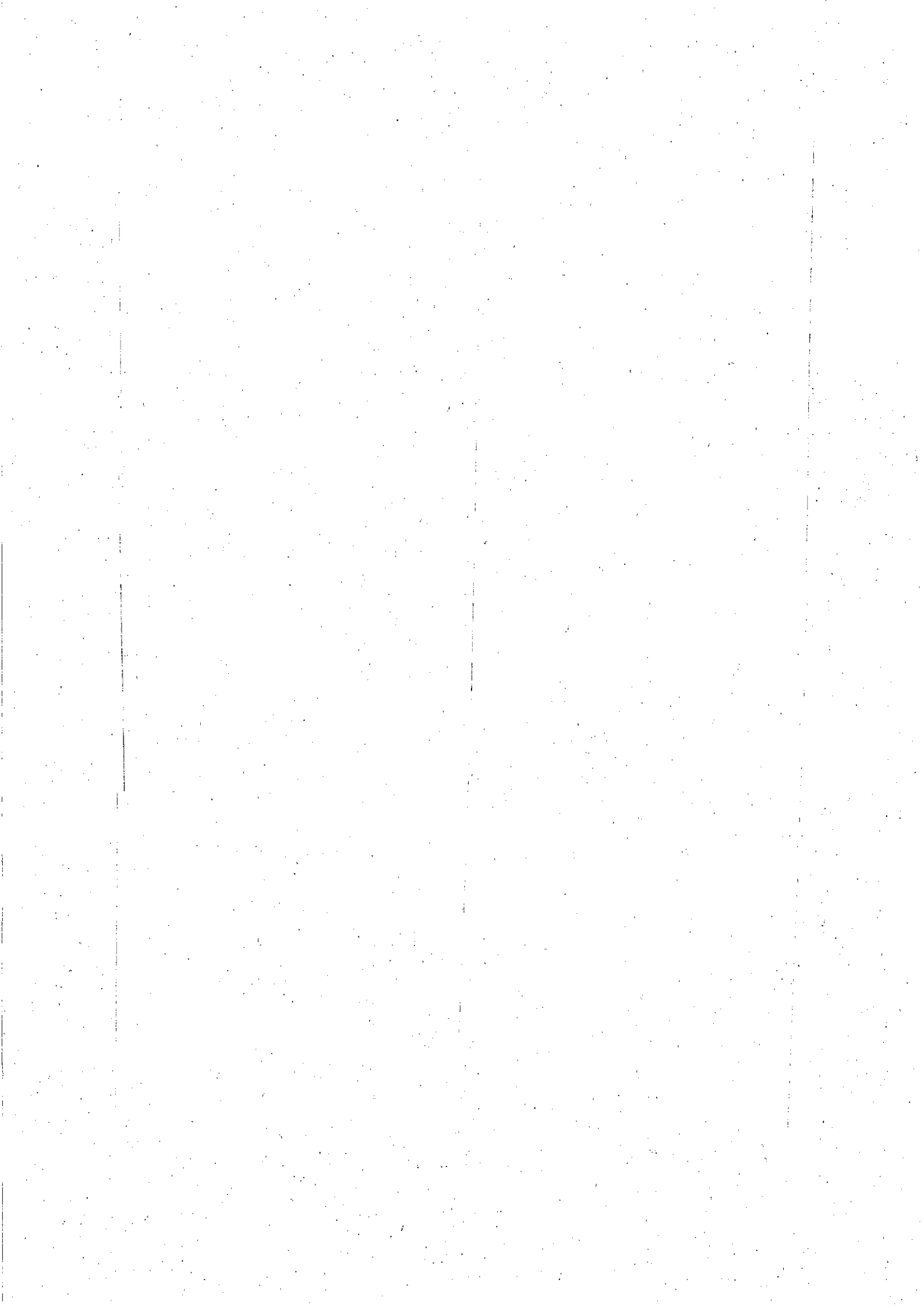
**GENERIC SUBMISSIONS BY SLATER AND GORDON  
ON THE QUESTION OF BROADCASTING PROCEEDINGS**

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**INTRODUCTION**

1. We are instructed by the following individuals in relation to allegations of sexual abuse by Lord Greville Janner:
  - A26
  - A27
  - A28
  - A29
  - A30
  - A31
  - A32
  - A33
  - A34
2. They have been granted core participant status in the Independent Inquiry into Child Sexual Abuse (hereafter 'the Inquiry'). Any submissions we make here are specific to the Janner module and we reserve the right to take a different approach in different module.
3. It is for the chair of the Inquiry to determine the rules applicable to media coverage of the Inquiry's public hearings.
4. We note Ben Emmerson QC's submissions on this point, which are very helpful. We note that the following approach is suggested at paragraph 4:
  - a. *providing designated media seating in the hearing room and - if necessary - in an overflow annex showing live video of proceedings;*
  - b. *granting permission to use live text-based communications from the Inquiry room;*

- c. *providing live transcription of proceedings visible within the Inquiry room; and*
  - d. *posting all transcripts and evidence to the Inquiry website.*
5. We confirm that those we represent do not object, in principle, to these measures and we support these in the spirit of the Inquiry being held in as transparent a way as possible, provided suitable measures are put in place to preserve our clients' anonymity.
  6. On that basis, we will limit our submissions to dealing with the broadcasting and/or live streaming of the Inquiry proceedings in the terms posited at paragraph 6 of Ben Emmerson QC's submissions, save the issue of 'jigsaw disclosure'. There is where the identity of a witness could be pieced together the facts presented during their evidence. To ameliorate this risk we suggest that any evidence should be redacted before being put in the public domain to remove reference to institutions which may identify the individual, including the name of a school or care home attended by a witness to the proceedings.
  7. Under s.18 of The Inquiries Act 2005 and subsequent case law, the chairman must ensure, as far as is reasonable, that the public 'see and hear a simultaneous transmission of proceedings at the Inquiry'. However, this is subject to the statutory right to anonymity under s.1 of the Sexual Offences (Amendment) Act 1992. If broadcasting and/or live streaming of the Inquiry is permitted then our clients' right to anonymity will need to be protected as otherwise the Inquiry would be in breach of the statute.
  8. In practice, the protection of our clients' anonymity must mean ensuring that neither audio or video footage of them can be broadcast. Video footage would clearly identify them and audio would still carry a very strong risk. If either of these were to be broadcast it would have a significant impact on our clients. It is of paramount concern to our clients that their image and voice cannot be broadcast giving their evidence. Unless this can be agreed many of our clients will not be willing to give evidence at the Inquiry, and clearly this will not be in the public interest.
  9. Some of our clients have spoken publicly regarding their alleged abuse by Janner. For the avoidance of doubt, we will argue that this should not be a factor in deciding how their evidence is to be presented to the Inquiry. The nature of giving a general account of how the case has affected them is very different to going into details regarding the acts alleged to have been committed.



Slater and Gordon  
04 March 2016