

IN THE SURREY CORONER’S COURT

BEFORE HM SENIOR CORONER FOR SURREY, MR RICHARD TRAVERS

IN THE MATTER OF THE GUILDFORD PUB BOMBINGS 1974

AND IN THE MATTER OF THE INQUESTS TOUCHING AND CONCERNING THE DEATHS OF:

- (1) MR PAUL CRAIG (DECEASED)**
- (2) GUARDSMAN WILLIAM FORSYTH (DECEASED)**
- (3) PRIVATE ANN HAMILTON (DECEASED)**
- (4) GUARDSMAN JOHN HUNTER (DECEASED)**
- (5) PRIVATE CAROLINE SLATER (DECEASED)**

JUNIOR COUNSEL NOTE OF PRE-INQUEST REVIEW HEARING

25th March 2022

1. Abbreviations

1.1 The following abbreviations may be used herein:

“CTI”	Counsel to the inquests;
“GPB”	Guildford Pub Bombings of 5 th October 1974;
“HMC”	HM Senior Coroner for Surrey, Mr Richard Travers;
“HGPH”	Horse & Groom Public House;
“IP”	Interested Person;
“MOD”	Ministry of Defence;
“MPS”	Metropolitan Police Service;
“PIR”	Pre-Inquest Review;
“PIRA”	Provisional Irish Republican Army;
“SECAMB”	South East Coast Ambulance Service NHS Foundation Trust.

2. Attendance

- 2.1 HMC began the PIR by welcoming the attendees. The legal representatives in attendance (in person) were:
- 2.1.1 Oliver Sanders QC, leading counsel to the inquests;
 - 2.1.2 Matthew Flinn, first junior counsel to the inquests;
 - 2.1.3 Alice Kuzmenko, second junior counsel to the inquests;
 - 2.1.4 Fiona Barton QC, leading counsel for Surrey Police;
 - 2.1.5 James Berry, counsel for MPS; and
 - 2.1.6 Edward Pleeth, counsel for MOD.

3. Summary note of hearing

- 3.1 After welcoming and introducing attendees, HMC checked that the IPs had received a copy of the agenda, and confirmed that no written submissions had been received apart from those provided by CTI.

Disclosure

- 3.2 CTI confirmed that disclosure had now been essentially completed, with Batches 1 – 3 now available to IPs on Caselines.
- 3.3 It was explained that there will be a final Batch 4, but that this would be a rolling batch on Caselines into which any further documents would be placed and made available as and when they were received and reviewed by CTI. IPs would be notified of any updates. It was anticipated that the number of further documents would be small.

Evidence

- 3.4 CTI noted that one area in which evidence was still being sought related to security alerts, advice, and warnings in place for army personnel in the period leading up to the GPB.

- 3.5 In terms of witnesses speaking to that issue, the topic was better addressed by more senior military personnel, however it was reported that CTI had had less engagement with that cohort of potential witnesses. That was because those in the HGPH on the night in question were mostly younger recruits and very few of the senior officers from the local barracks made statements to Surrey Police at the time.
- 3.6 One relatively senior officer who did make a statement was 2nd Lt Gillian Taylor. She was involved in the identification of the bodies of Ann Hamilton and Caroline Slater (as they were recruits from her barracks). Junior CTI had been in contact with her (now Gillian Boag-Munroe) to explore the scope of the evidence she might be able to give about security measures/advice/training generally at the time. CTI reported that it appeared she would be able to provide some useful evidence on that topic, and had also provided some further names that the counsel team could follow up.
- 3.7 Such enquiries, and a number of other avenues being explored by CTI, meant that IPs could anticipate a few further witness statements being added to Batch 4 on Caselines in the coming weeks.
- 3.8 Further enquiries on this topic were being pursued by the MOD. Mr Pleeth confirmed to HMC that the Defence Inquest Unit from MOD had been working hard to locate any relevant documents setting out security policies and procedures that were in place at the time. This had not been a straightforward exercise, and a number of avenues had been explored which had not yielded any results. However, there remained a few outstanding lines of enquiry, and the MOD did anticipate that it would be able to provide some additional material to the court. The MOD also proposed to provide an additional witness statement speaking to this issue to assist the court as far as possible.
- 3.9 HMC acknowledged the MOD's efforts, and confirmed that he required, in addition to provision of any relevant materials located, a statement or report explaining what steps the MOD had taken to carry out searches and what the outcome of those searches had been.

- 3.10 CTI then provided an update on the report of Ms Lorna Hills from the Defence Science and Technology Laboratory. This had been provided to CTI on 21st March 2022 and had been circulated to IPs. It did not contain expert evidence from Ms Hills herself, strictly speaking, but rather interpreted the expert evidence and materials in relation to the explosive device and blast that were generated in the aftermath of the GPB.
- 3.11 CTI raised the query of whether it was sufficient to hear oral evidence from Ms Hills on the basis of her report, or whether the underlying materials on which it was based should be also read directly into evidence under Rule 23 of the Coroners (Inquests) Rules 2013.
- 3.12 On that topic Ms Barton QC for Surrey Policy expressed the view that it was not necessary to read in the underlying materials, given that:
- 3.12.1 Ms Hills will be best able to understand and speak to those materials; and
- 3.12.2 IPs will have a list of the underlying documentation and can ask questions about it.
- 3.13 That submission was supported by Mr Pleeth for the MOD, and Mr Berry for MPS.
- 3.14 CTI indicated that HMC's counsel team was neutral on the point, although noted there was likely to be a lot of read evidence during the inquest hearings, and that might be considered a point in favour of not reading documents where it was not necessary to do so.
- 3.15 In light of the submissions made, HMC confirmed that he was content to rely on the report and oral evidence of Ms Hills without reading into evidence the underlying materials.
- 3.16 CTI noted that a further piece of evidence which was yet to be received was the report of Professor Thomas Hennessey, expert historian. However, it was confirmed that HMC's junior counsel team had had discussions with him and confirmed his instructions, and that his report was in progress. It was proposed to set a further PIR

hearing prior to the inquests, and to ask for a draft report to be provided to HMC in advance of that fixture.

Witnesses

3.17 CTI then provided a summary update on tracing and contacting witnesses to assist at the final hearings:

3.17.1 Based on the level of success in contacting witnesses thus far and establishing their capacity and availability to attend the inquest hearings, it appeared that there would be a maximum of around 25 – 30 witnesses to choose from in terms of calling live evidence.

3.17.2 CTI proposed to produce a draft timetable and running order before Easter i.e. by mid-April, which would enable witnesses to plan and make logistical arrangements for their attendance.

3.17.3 HMC's junior counsel team was liaising with representatives from each family to prepare "Pen Portrait" witness statements (apart from the family of Ann Hamilton, who do not wish to participate due to the unavailability of legal aid). It was anticipated that those statements would be finalised and made available before the next PIR hearing.

Arrangements for the final inquest hearings

3.18 Looking ahead to the timing of the final hearing, CTI noted that at present the court had set aside a hearing window from 6th June to 15th July 2020 (a period of six weeks). However, CTI felt, having regard to the amount of proposed read and live evidence, it was possible to narrow the hearing window down to three weeks.

3.19 HMC noted that the court diary was currently very full. He did not wish to be in the position of reducing the timetable, freeing up the time for other cases, and then running out of time to complete the final hearings if they took longer than anticipated. He therefore decided to reduce the hearing window to four weeks, with the fourth week

kept in reserve. This entailed pushing the start of the hearings from 6th to 20th June 2020. It was noted that this would also work with other commitments of certain counsel for the IPs.

- 3.20 CTI then addressed some logistical points in respect of the final hearings.
- 3.21 It was confirmed that the court would be obtaining transcripts, which would be put on the Surrey County Council GPB webpage as and when they were prepared. These would be prepared from court recordings and would not be immediately available. The issue was what “turnaround time” to arrange, noting that faster turnaround times (e.g. 24 hours) were more expensive than e.g. 48 or 72 hours.
- 3.22 HMC noted that he would normally opt for a 48 or 72 hour turnaround time, bearing in mind that if any points needed to be urgently checked or confirmed, the recordings could be reviewed. However, the problem with that time period was that in the event that a request was made to obtain a transcript for a particular day more urgently (e.g. 24 hours), the capacity of the transcription service to meet that request depended entirely on how busy it happened to be at the time (because it had no contractual commitment to provide the transcript in a faster timeframe).
- 3.23 Ms Barton QC for Surrey police urged the court to contract for a 24 hour turnaround time if the funding was available. She explained that it was her experience that the value and utility of transcripts lay in being able to refer to them rapidly as issues arose.
- 3.24 HMC said he would obtain the necessary information on costings and consider the matter, and notify IPs accordingly.
- 3.25 Finally, CTI noted that it was anticipated that the court would receive an increased number of media requests for information/documents as the hearings approached and got underway. The counsel team had planned a meeting with representatives of Surrey Police about practical arrangements for dealing with such requests. The outcome of

that meeting would be communicated to media representatives and any submissions on the approach adopted could be made at the next PIR hearing.

Correspondence from the family of Ann Hamilton

3.26 CTI noted some correspondence which was received from Cassandra Hamilton (the sister of Ann Hamilton) on 6th February 2022, to which HMC's officer had replied on his behalf. The correspondence had been circulated to IPs. As set out in the written submissions, CTI confirmed that the counsel team's view was that the contents of the correspondence did not change the position as to whether the GPB could/should have been foreseen or anticipated. However, the matter would remain under review as the last pieces of evidence were obtained. No other IP in attendance wished to make submissions on the issue.

4. Other business

4.1 HMC stated that he felt it was suitable to have a further PIR, and 6th May 2022 would be suitable for the court, with a start time of 10 am. He indicated that, as discussed, the final hearings were likely to start on 20th June, but that would be confirmed to IPs in due course.¹

MATTHEW FLINN

11th April 2022

¹ The court subsequently confirmed that hearings would start on 20th June 2022, with a diary allocation of four weeks.