

<p>1 Monday, 16 August 2021 2 (10.10 am) 3 (In the presence of the jury) 4 MR JUSTICE HILLIARD: Good morning, ladies and gentlemen. 5 Yes. Good morning. 6 MR HOUGH: Today's witness is Al Reid. Perhaps he could be 7 sworn. 8 ALASTAIR REID (sworn) 9 Questions by MR HOUGH 10 MR HOUGH: Could you please give your full name for the 11 court record. 12 <b>A. Alastair James Reid.</b> 13 Q. Mr Reid, you appreciate that I am asking you questions 14 on behalf of the coroner. 15 What was your job in January and February 2020, the 16 period with which we are concerned? 17 <b>A. I was the national security lead for the National 18 Probation Service at the time.</b> 19 Q. Since when had you occupied that post? 20 <b>A. The name of that post was 2017, but I'd sort of held the 21 responsibilities under that remit for a number of years.</b> 22 Q. Is it right that in terms of your job titles, you worked 23 as head of the dangerous offenders section from 2010 24 to October 2016, and head of the critical operational 25 support unit from October 2016 to June 2017?</p> <p style="text-align: center;">Page 1</p>	<p>1 Q. Is it right that, taking account of the time he'd served 2 on remand before his conviction and sentence, he was 3 always entitled to be released on 23 January 2020? 4 <b>A. Yes.</b> 5 Q. That's obviously unless, for example, dates have been 6 added to his sentence by virtue of an adjudication in 7 the prison? 8 <b>A. Yes.</b> 9 Q. That didn't happen, so we can ignore that. 10 <b>A. Yes.</b> 11 Q. Is it right that he was then going to be subject to 12 licence, including those licence conditions that the 13 jury have seen, and supervision by the Probation Service 14 for the remaining 20 months of his sentence? 15 <b>A. That's right, yes.</b> 16 Q. During that period of 20 months, from the end 17 of January 2020, is it right that there were legal 18 provisions, meaning that he could be recalled to prison 19 by the National Probation Service? 20 You are nodding. Yes? 21 <b>A. Yes, sorry.</b> 22 Q. Because we have a transcript. 23 The National Probation Service, in doing that, would 24 be using powers which have been conferred by act of 25 Parliament on the Secretary of State for Justice?</p> <p style="text-align: center;">Page 3</p>
<p>1 <b>A. Yes.</b> 2 Q. Is it right that in all of those leadership roles you 3 dealt with terrorist offenders who were being supervised 4 by the Probation Service in the community? 5 <b>A. Indeed, yes.</b> 6 Q. Do you appreciate that the purpose of your evidence 7 today is twofold: first of all, to outline the law, 8 guidance and procedures for recalling to prison 9 an offender who is in the community on licence? 10 <b>A. Yes, yes.</b> 11 Q. And secondly, to deal with your brief involvement in 12 Mr Amman's case, in particular on Friday 13 31 January 2020? 14 <b>A. Yes.</b> 15 Q. May we begin with recall decisions and the law on those. 16 Now, we know that in December 2018 Sudesh Amman was 17 given what's known as a determinate sentence, 3 years 18 and 4 months, so 40 months in total. Do you understand 19 that? 20 <b>A. Yes.</b> 21 Q. Can you confirm that that meant he was entitled to be 22 released early on licence automatically at the halfway 23 point of his sentence, after serving 20 months of actual 24 detention in prison? 25 <b>A. Yes, that's right, at the time, yes.</b></p> <p style="text-align: center;">Page 2</p>	<p>1 <b>A. That's right.</b> 2 Q. And it's pretty commonplace, isn't it, that an act of 3 Parliament will say that a Secretary of State has some 4 powers, but they're in fact exercised by people in 5 a particular department or unit or agency of government? 6 <b>A. That's right.</b> 7 Q. Can you also confirm that since the period we are 8 concerned with the law has changed for terrorist 9 prisoners such as Mr Amman in that, first of all, they 10 now spend a longer portion of their sentence in prison, 11 two-thirds of the full term? 12 <b>A. That's right.</b> 13 Q. And also they can only be released on licence even at 14 that point if the Parole Board approves of the release? 15 <b>A. That's right.</b> 16 Q. Those provisions weren't in place at the time we're 17 concerned with? 18 <b>A. No.</b> 19 Q. Is it right that the powers to recall prisoners at the 20 time we're concerned with, and in fact now, are under 21 the Criminal Justice Act 2003? 22 <b>A. That's correct.</b> 23 Q. Can you confirm that section 254 is the relevant 24 section, and that gives the power to recall to prison 25 a person who has been released from prison and is during</p> <p style="text-align: center;">Page 4</p>

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<p>1 the licence period, as Sudesh Amman was in the period 2 we're concerned with? 3 Is it right that that's an entirely general power in 4 this sense: there's nothing in the statute saying that 5 it can only be exercised in certain circumstances? 6 <b>A. Yes.</b> 7 Q. Are you agreeing with me or disagreeing? 8 <b>A. I'm agreeing with you, yes, sorry.</b> 9 Q. In particular, is it right that there's nothing in the 10 actual statute to say that it can only be exercised if 11 a licence condition has been breached? 12 <b>A. That's right.</b> 13 Q. Are you aware that the Court of Appeal has said that 14 a breach of licence conditions is not necessarily 15 required for recall? 16 <b>A. That's right.</b> 17 Q. But is it right that in practice a recall is often in 18 fact triggered by a breach of licence condition? 19 <b>A. Correct.</b> 20 Q. We know that National Probation Service is the agency 21 which manages offenders in the community in that it 22 monitors and enforces compliance with a licence? 23 <b>A. That's right.</b> 24 Q. In Sudesh Amman's case, who would have been primarily 25 responsible for overseeing his compliance with the</p> <p style="text-align: center;">Page 5</p>	<p>1 Q. As a matter of practicalities, if those in the 2 Probation Service who are managing an offender decide 3 that a recall to prison is justified using that power we 4 discussed earlier, how do they manage that? Who do they 5 speak to or refer to? 6 <b>A. The public protection casework section.</b> 7 Q. The public protection casework section, is that part of 8 the Probation Service? 9 <b>A. No, it's part of Her Majesty's Prison and Probation 10 Service that sits in the public protection group within 11 headquarters.</b> 12 Q. In any event, the public protection casework section is 13 part of Her Majesty's Prison and Probation Service, and 14 is it somebody in that section who formally exercises 15 the section 254 power to recall the person to prison? 16 <b>A. On behalf of the Secretary of State yes.</b> 17 Q. On behalf of the Secretary of State, yes. 18 Now I'm now going to ask you about the two principal 19 types of recall, which you addressed from page 4 of your 20 statement. 21 First of all, may an offender be subject to what's 22 called a fixed-term recall? What, in a sentence or two, 23 is that? 24 <b>A. The fixed-term recall is a short period of recall booked 25 in at 28 days to manage a temporary lapse in the risk</b></p> <p style="text-align: center;">Page 7</p>
<p>1 licence conditions? 2 <b>A. His offender manager.</b> 3 Q. That was Mr Campbell, community offender manager? 4 <b>A. In London, yes.</b> 5 Q. But, in practice, would Mr Campbell work with his line 6 manager who is the head of his unit, Ms Heckroodt, on 7 making any such decisions? 8 <b>A. Yes, correct. There's normally three levels of 9 community offender manager. It's the senior probation 10 manager and then, in this case, Carina.</b> 11 Q. So Mr Campbell might work with a senior probation 12 officer directly above him and Ms Heckroodt two rungs up 13 the ladder -- 14 <b>A. Yes.</b> 15 Q. -- in order to make any decisions on enforcing 16 compliance? 17 <b>A. Yes.</b> 18 Q. Can you confirm that Ms Heckroodt in fact had a higher 19 level of security clearance than Mr Campbell? 20 <b>A. Yes she did.</b> 21 Q. And that meant, did it, that she could be given some 22 secret intelligence which he couldn't receive and 23 therefore she could make some decisions informed by such 24 intelligence? 25 <b>A. That's correct.</b></p> <p style="text-align: center;">Page 6</p>	<p>1 <b>arrangements, assuming that that risk management plan 2 can be re-established within that period.</b> 3 Q. So where an offender is subject to fixed-term recall, 4 the person is then brought back to prison for either 5 14 or 28 days. The choice between 14 and 28 days, does 6 that depend on how long their original sentence was? 7 <b>A. I'm not absolutely clear. It's usually a date when 8 a risk management plan can be reinstated.</b> 9 Q. In any event, it's a short original recall period? 10 <b>A. Yes.</b> 11 Q. And at the end of that period under a fixed-term recall, 12 the person is entitled to be released? 13 <b>A. Yes.</b> 14 Q. Now, is it right that an offender can't be subject to 15 fixed term recall if it's considered that they present a 16 risk of serious harm to the public? 17 <b>A. Correct, yes, it is. High risk of harm, yes.</b> 18 Q. If it's ...? 19 <b>A. High risk of harm. If they're assessed as high risk of 20 harm, then it's assumed that the risk cannot be managed 21 within that period of time.</b> 22 Q. So an offender who is assessed as representing either 23 a high or a very high risk of serious harm to the 24 general public, will not be subject to fixed-term 25 recall?</p> <p style="text-align: center;">Page 8</p>

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<p>1 <b>A. Correct.</b></p> <p>2 Q. Is it right, as you indicated earlier, that the real</p> <p>3 objective of fixed-term recall is to recall somebody who</p> <p>4 presents an immediate risk because of short-term</p> <p>5 circumstances which can be resolved in the near future?</p> <p>6 <b>A. Correct.</b></p> <p>7 Q. Might an example be an offender with a drug or alcohol</p> <p>8 problem whose life needs to be stabilised for a short</p> <p>9 period while appropriate accommodation is found?</p> <p>10 <b>A. Correct.</b></p> <p>11 Q. And to be clear, Sudesh Amman was consistently assessed</p> <p>12 as presenting at least a high risk of serious harm to</p> <p>13 the public? You are aware of that?</p> <p>14 <b>A. That's as far as I understand, yes.</b></p> <p>15 Q. So he wouldn't have been suitable for the fixed-term</p> <p>16 process at all?</p> <p>17 <b>A. No.</b></p> <p>18 Q. So we can now just put that to one side?</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. As far as he's concerned.</p> <p>21 Is it right, secondly, that if you don't go for</p> <p>22 fixed-term recall, an offender is subject to what's</p> <p>23 called standard recall?</p> <p>24 <b>A. Correct.</b></p> <p>25 Q. What is the effect of somebody being recalled to prison</p> <p style="text-align: center;">Page 9</p>	<p>1 Q. If at the end of that 12 months it was decided he</p> <p>2 couldn't be safely released by a particular date, how</p> <p>3 long would he then serve?</p> <p>4 <b>A. Well, in his case, given the length of the sentence, he</b></p> <p>5 <b>would have served to the end of his sentence.</b></p> <p>6 Q. So he could have been kept in prison as a result of</p> <p>7 Parole Board decisions up until the end of the original</p> <p>8 40 months?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. So, another 20 months after the end of January 2020?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Is it right that when the Parole Board takes that</p> <p>13 decision at the 28-day point, whether to set a date for</p> <p>14 release or to keep the offender in custody for another</p> <p>15 12 months, it doesn't just consider whether the original</p> <p>16 decision by the public protection casework section to</p> <p>17 recall was correct?</p> <p>18 <b>A. Yes, indeed.</b></p> <p>19 Q. You're agreeing with me?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. Is it right that it also makes a full consideration of</p> <p>22 the offender's ongoing detention and the requirements of</p> <p>23 public protection?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. What, in a nutshell, is the question or test for the</p> <p style="text-align: center;">Page 11</p>
<p>1 on a standard recall?</p> <p>2 <b>A. The re-release is then based on a referral to the Parole</b></p> <p>3 <b>Board and for Parole Board consideration to determine</b></p> <p>4 <b>whether they're safe to be re-released.</b></p> <p>5 Q. Is it right, in particular, that the person's case will</p> <p>6 be reviewed by the Parole Board at the end of a 28-day</p> <p>7 period?</p> <p>8 <b>A. Yes. The public protection casework section is required</b></p> <p>9 <b>to provide Parole Board with a dossier at that 28 day</b></p> <p>10 <b>point.</b></p> <p>11 Q. Can you try and keep your voice up because we're</p> <p>12 broadcasting to other courts.</p> <p>13 <b>A. Yes, sorry.</b></p> <p>14 Q. So if Sudesh Amman had been recalled to prison</p> <p>15 in January 2020, he would have been taken back to prison</p> <p>16 and at some point after the 28-day stage the Parole</p> <p>17 Board would have received a referral?</p> <p>18 <b>A. (Nodded assent)</b></p> <p>19 Q. And it would have then considered his case and set</p> <p>20 a date for release; is that right?</p> <p>21 <b>A. If they determined that he could be released, yes.</b></p> <p>22 Q. And if they determined that he couldn't safely be</p> <p>23 released, how long could he be kept in prison?</p> <p>24 <b>A. He would remain in custody and then we would case review</b></p> <p>25 <b>it again within 12 months.</b></p> <p style="text-align: center;">Page 10</p>	<p>1 board when deciding whether to set a date for release or</p> <p>2 to carry on the detention potentially up to the end of</p> <p>3 the original sentence?</p> <p>4 <b>A. Primarily whether the risk presented by the offender can</b></p> <p>5 <b>be safely managed in the community and/or whether</b></p> <p>6 <b>detention -- continued detention in custody is needed to</b></p> <p>7 <b>manage that risk.</b></p> <p>8 Q. So, in short, it's all about what is necessary for</p> <p>9 public protection?</p> <p>10 <b>A. Indeed.</b></p> <p>11 Q. May we now turn to look at some of the licence</p> <p>12 conditions.</p> <p>13 May we have on screen, please, INQ000076.</p> <p>14 If we maximise the paragraph right at the bottom,</p> <p>15 paragraph 5.</p> <p>16 Now Sudesh Amman was subject to these conditions in</p> <p>17 the period we are concerned with:</p> <p>18 "i. Be of good behaviour and not behave in a way</p> <p>19 which undermines the purpose of the licence period;</p> <p>20 "ii. Not [to] commit any offence; [and]</p> <p>21 "iii. [To] keep in touch with the supervising</p> <p>22 officer in accordance with instructions given by the</p> <p>23 supervising officer ..."</p> <p>24 Is it right that the supervising officer for these</p> <p>25 purposes is primarily Mr Campbell?</p> <p style="text-align: center;">Page 12</p>

1 **A. That's correct.**  
 2 Q. And, just to be clear, the good behaviour condition is  
 3 separate from and additional to the condition not to  
 4 commit a criminal offence?  
 5 **A. Correct.**  
 6 MR JUSTICE HILLIARD: I don't want to take you out of your  
 7 turn, Mr Hough, I have a question just to be clear about  
 8 what is meant by undermining the purpose of the licence  
 9 period, but if you are coming on to that in your own way  
 10 then I'll leave it.  
 11 MR HOUGH: I am in the next couple of questions --  
 12 MR JUSTICE HILLIARD: Right.  
 13 MR HOUGH: -- but (overspeaking) --  
 14 MR JUSTICE HILLIARD: No, no, no, we'll leave that. I will  
 15 leave your framework to you. Thank you very much.  
 16 MR HOUGH: So, is it right that the good behaviour condition  
 17 is one that is pretty standard for offenders on licence?  
 18 **A. Yes, there are six or seven standard licence conditions**  
 19 **that every offender is subject to, of which those top**  
 20 **three are the first three.**  
 21 Q. And is it right that according to the decisions of the  
 22 courts, the good behaviour condition is given its  
 23 ordinary natural meaning? It isn't a term of art?  
 24 **A. That's right, yes.**  
 25 Q. Is it right, for example, that a breach of that may be

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1 found by reference to criminal lifestyle or  
 2 associations, or conduct suggesting that the offender is  
 3 planning an offence?  
 4 **A. It could be used for that, yes.**  
 5 Q. Can you give us any more elaboration or explanation as  
 6 to what that condition means and the circumstances in  
 7 which it applies?  
 8 **A. The purpose of the licence condition is essentially to**  
 9 **manage risk and protect the public. Any behaviour which**  
 10 **would indicate that that is undermined, as the licence**  
 11 **condition says, it could be something like where**  
 12 **somebody's behaving in a threatening and intimidating**  
 13 **way in public, putting the public in distress or fear of**  
 14 **harm, that may not be covered by the additional licence**  
 15 **conditions, the specifics of additional licence**  
 16 **conditions that Sudesh Amman was subject to. It's**  
 17 **a general behaviour clause that would -- allows us to**  
 18 **kind of consider anything that would indicate that**  
 19 **the -- puts the licence period, ie to protect the**  
 20 **public, in jeopardy.**  
 21 Q. Have there, for example, also been instances where the  
 22 courts have upheld decisions to recall based on the good  
 23 behaviour condition where somebody has been engaging in  
 24 associations with others which suggest that they intend  
 25 to commit an offence, engaging, for example, in

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1 gang-related activity?  
 2 **A. There may well be, yes. I think the -- the -- the thing**  
 3 **for here is that most -- or a lot of offenders are just**  
 4 **subject to standard licence conditions. But this for**  
 5 **other offenders is probably more prominent as a licence**  
 6 **condition. Whereas somebody like Sudesh Amman, who had**  
 7 **a number of additional licence conditions, they're**  
 8 **probably more specific to the risks that he presented.**  
 9 Q. Even with someone like Sudesh Amman, is this condition  
 10 valuable in, as it were, filling the gaps between other  
 11 more --  
 12 **A. Indeed, yes.**  
 13 Q. -- specific conditions?  
 14 You will have heard a few moments ago the learned  
 15 judge's point. Does the expression "which undermines  
 16 the purpose of the licence period" add anything to this?  
 17 **A. It reinforces the point of good behaviour. We're**  
 18 **seeking to rehabilitate individuals into meaningful,**  
 19 **productive members of the community; anything that**  
 20 **undermines that or risks undermining that which suggests**  
 21 **that they've not been of good behaviour and therefore**  
 22 **liable to recall.**  
 23 Q. Is another aspect of the purpose of the licence period  
 24 to assist in public protection?  
 25 **A. Indeed, yes.**

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1 Q. So could behaviour which undermined or threatened to  
 2 undermine public protection also be bad behaviour?  
 3 **A. Yes.**  
 4 MR HOUGH: I'll pause there. Does that cover your --  
 5 MR JUSTICE HILLIARD: Yes, that's just what I wanted to  
 6 know. Thank you.  
 7 MR HOUGH: In general, Mr Reid, where recall is based on  
 8 a breach of licence conditions, is it right that the  
 9 question is whether the offender appears not to comply  
 10 with the licence conditions?  
 11 **A. Sorry, could you repeat that?**  
 12 Q. Yes, I'll repeat it, because it's quite an important and  
 13 careful form of words.  
 14 Is it right that in general, where a recall is based  
 15 on a breach of licence conditions, that it isn't only to  
 16 be based on a breach of licence conditions, or always to  
 17 be based on a breach of licence conditions, but where it  
 18 is based on a breach of licence conditions, is it right  
 19 that the question is whether the offender appears not to  
 20 comply with the licence conditions?  
 21 **A. No, we -- we usually need some sort of evidence,**  
 22 **concrete evidence, the breach had taken place.**  
 23 Q. I am just going to suggest to you, you can agree or  
 24 disagree with me, that the courts have upheld the test  
 25 of whether the offender appears not to comply.

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<p>1 <b>A. Okay.</b></p> <p>2 Q. The judge can direct the jury.</p> <p>3 <b>A. (Nodded assent)</b></p> <p>4 Q. But in any event, is it necessary for the offender</p> <p>5 manager to be sure that there has been non-compliance?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. You think that it is necessary to be sure that there has</p> <p>8 been non-compliance?</p> <p>9 <b>A. I would say so, yes.</b></p> <p>10 Q. Now, is this right: a recall based on non-compliance may</p> <p>11 only be made if necessary for public protection, if the</p> <p>12 person can't be safely managed in the community?</p> <p>13 <b>A. Correct.</b></p> <p>14 Q. So a trivial non-compliance by an offender who isn't</p> <p>15 presenting any risk to the public isn't enough?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. May we now look at the guidance on recall.</p> <p>18 Is it right that the HM Prison and Probation Service</p> <p>19 has published formal guidance for the making of recall</p> <p>20 decisions, which was reissued in its latest iteration</p> <p>21 in April 2019?</p> <p>22 <b>A. In the policy framework, yes.</b></p> <p>23 Q. May we put that on screen please, INQ003678.</p> <p>24 Can you confirm that this is the policy framework</p> <p>25 you were just talking about?</p> <p style="text-align: center;">Page 17</p>	<p>1 offences being committed?</p> <p>2 <b>A. Correct.</b></p> <p>3 Q. And, in addition, it may be considered if the contact</p> <p>4 between the offender manager and the offender has broken</p> <p>5 down.</p> <p>6 Just to confirm, if those at the Probation Service</p> <p>7 conclude at any time that an offender such as</p> <p>8 Sudesh Amman, that based on his behaviour there's</p> <p>9 an imminent risk of future offences being committed, the</p> <p>10 recall decision could be made?</p> <p>11 <b>A. Could be made, yes.</b></p> <p>12 Q. In fact, would have to be considered under this</p> <p>13 framework?</p> <p>14 <b>A. Indeed.</b></p> <p>15 Q. And as you've told us that, in Sudesh Amman's case, he</p> <p>16 could then be recalled to prison for at least 28 days?</p> <p>17 <b>A. Well, yes, beyond that.</b></p> <p>18 Q. And the Parole Board could then, beyond that, decide --</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. -- to keep him in prison for longer, and he could be</p> <p>21 kept in prison for up to nearly 20 months?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. And how long he was kept in prison would depend on</p> <p>24 considerations of what was necessary for public</p> <p>25 protection, as you've told us?</p> <p style="text-align: center;">Page 19</p>
<p>1 <b>A. Correct, yes.</b></p> <p>2 Q. May we go to page 9 which is the relevant part of our</p> <p>3 purposes. We can blow up and maximise, please, sections</p> <p>4 4.3.9 to 4.3.11.</p> <p>5 If we look at 4.3.9, do we see that the framework</p> <p>6 says:</p> <p>7 "Offender managers must consider whether to seek</p> <p>8 recall in cases where an offender has breached the</p> <p>9 conditions of their licence, the offender's behaviour</p> <p>10 indicates that they present an increased or unmanageable</p> <p>11 RoSH [risk of serious harm] to the public or where there</p> <p>12 is an imminent risk of further offences being committed.</p> <p>13 Offender managers must also consider recall in cases</p> <p>14 where contact between the offender manager and the</p> <p>15 offender has broken down."</p> <p>16 <b>A. Correct.</b></p> <p>17 Q. So recall has to be considered, first of all, if</p> <p>18 an offender has breached licence conditions; that's one</p> <p>19 basis for giving recall?</p> <p>20 <b>A. Mm-hm.</b></p> <p>21 Q. Or, secondly, if the offender's behaviour indicates that</p> <p>22 they present an increased or unmanageable risk of</p> <p>23 serious harm --</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. -- to the public, or there is an imminent risk of future</p> <p style="text-align: center;">Page 18</p>	<p>1 <b>A. Yes.</b></p> <p>2 Q. Is it right that the decision that there was an imminent</p> <p>3 risk of future offences being committed would only have</p> <p>4 to be based on a view which those managing the offender</p> <p>5 could reasonably form?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Be their reasonable judgment?</p> <p>8 Paragraph 4.3.10 says:</p> <p>9 "The decision to request recall must be based on</p> <p>10 an offender's behaviour whilst on licence."</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. So you can't just release somebody from prison and then</p> <p>13 decide to recall them based on something they did --</p> <p>14 based entirely on something they did in prison?</p> <p>15 <b>A. No, no.</b></p> <p>16 Q. But is it right that when making the judgment on recall,</p> <p>17 that can be informed by an assessment of risk which</p> <p>18 takes account of pre-recall or pre-release conduct?</p> <p>19 <b>A. Yes, so any recall decision should be based on</b></p> <p>20 <b>assessment of risk.</b></p> <p>21 Q. So you may have an offender who does something</p> <p>22 indicating some risk of future offending, and the</p> <p>23 decision actually to make the recall is partly</p> <p>24 influenced by the general risk that the offender poses?</p> <p>25 <b>A. Yes --</b></p> <p style="text-align: center;">Page 20</p>

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<p>1 Q. Looking at his whole life?</p> <p>2 <b>A. Yes, and the context of their response to supervision in</b></p> <p>3 <b>the community.</b></p> <p>4 Q. If we look at paragraph 4.3.11 there's:</p> <p>5 "Offender managers must consider whether to seek</p> <p>6 recall in cases where they have reason to believe that</p> <p>7 an offender is actively thinking about re-offending."</p> <p>8 Then there's further information on an internal link</p> <p>9 about offenders disclosing thoughts of re-offending?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. And do you see at 4.3.11 the test which the framework</p> <p>12 identifies is where the offender manager has reason to</p> <p>13 believe; do you see that?</p> <p>14 <b>A. 4.3.11?</b></p> <p>15 Q. Yes.</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. Would you accept that reason to believe is a relatively</p> <p>18 low threshold, not confidence or sureness or -- or some</p> <p>19 such?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. May we now turn to the emergency process for recall and</p> <p>22 page 10 of this document. If we maximise the bottom</p> <p>23 half of that page.</p> <p>24 Ms Heckroodt in her evidence referred to the</p> <p>25 emergency process for recall. Now, to be clear can you</p> <p style="text-align: center;">Page 21</p>	<p>1 Q. Does the emergency process mean that the recall takes</p> <p>2 place quickly or as a matter of urgency?</p> <p>3 <b>A. Usually within two hours, I think, is the expectation.</b></p> <p>4 Q. If we move to page 11, please, paragraph 4.3.24 and 25,</p> <p>5 we see that the framework goes on to set out how the</p> <p>6 recall request is submitted, that it's an initial</p> <p>7 decision of the offender manager. Someone like</p> <p>8 Mr Campbell, yes?</p> <p>9 <b>A. Yes, correct.</b></p> <p>10 Q. Could it be initiated by Ms Heckroodt, for example, if</p> <p>11 she was making the decision?</p> <p>12 <b>A. Yes, she does the ultimate sign-off for any recall, yes.</b></p> <p>13 Q. And then do we see from paragraph 4.3.25 that it's</p> <p>14 submitted in the form of a Part A report along with</p> <p>15 mandatory supporting documents?</p> <p>16 <b>A. That's correct.</b></p> <p>17 Q. May we go to the Part A report, INQ003679.</p> <p>18 If we just go through that to see its broad content,</p> <p>19 can we see that at page 1, leading into page 2,</p> <p>20 background details of the offender are to be set out,</p> <p>21 including sentence details and so on; do you see that?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Page 3, please. Do you see at page 3 the basis of the</p> <p>24 decision is to be set out, including answers to various</p> <p>25 specific questions?</p> <p style="text-align: center;">Page 23</p>
<p>1 confirm this, Mr Reid, the emergency process is</p> <p>2 concerned with the practicalities for arranging recall</p> <p>3 rather than the criteria or test for making the decision</p> <p>4 on recall in the first place?</p> <p>5 <b>A. That's correct, yes.</b></p> <p>6 Q. It's about how it works if the decision to recall has</p> <p>7 actually been made?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. May we see at paragraph 4.3.20 of the framework, it says</p> <p>10 in what circumstances the emergency process is to be</p> <p>11 used. Can we see that one of those is where the</p> <p>12 offender is subject to MAPPA level 3 arrangements or is</p> <p>13 a critical public protection case?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. We know that Sudesh Amman was being managed both at</p> <p>16 MAPPA level 3 and as a critical public protection case?</p> <p>17 <b>A. He was.</b></p> <p>18 Q. You are aware of that.</p> <p>19 Is it right that if a decision had been made to</p> <p>20 recall Sudesh Amman, the emergency process would have</p> <p>21 been used?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Because it says that that's the process which applies in</p> <p>24 one of these circumstances?</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 22</p>	<p>1 <b>A. Yes.</b></p> <p>2 Q. Including the current risk of serious harm assessment,</p> <p>3 at 15.</p> <p>4 And over the page, do we see at 17 there is a tick</p> <p>5 box section to identify any licence conditions which</p> <p>6 have been breached?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. 18, a section in which further licence conditions</p> <p>9 breached can be identified?</p> <p>10 <b>A. Correct.</b></p> <p>11 Q. 19, details of the circumstances and behaviours leading</p> <p>12 to the recall?</p> <p>13 <b>A. Correct.</b></p> <p>14 Q. So if, for example, the recall wasn't based on a breach</p> <p>15 of licence conditions but on some other basis, the tick</p> <p>16 box would be left empty but section 19 would be</p> <p>17 completed?</p> <p>18 <b>A. Correct.</b></p> <p>19 Q. And then 20, request details of how the offender has</p> <p>20 responded to supervision to date.</p> <p>21 Then page 5, we see that there's a requirement set</p> <p>22 out, a detail of section on -- detailing whether</p> <p>23 alternatives to recall has been used?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. And then for determinate sentence offenders such as</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 Sudesh Amman, a section addressing whether the person is 2 suitable for fixed-term recall, which we know he 3 wouldn't have been? 4 <b>A. Correct.</b> 5 Q. And then page 6, at the bottom of the page, there is the 6 section for endorsement by the offender manager's line 7 manager? 8 Page 7, authorisation and comments by a senior 9 manager? 10 Yes? 11 <b>A. Correct.</b> 12 Q. And then a series of mandatory attachments including the 13 latest OASys risk assessment? 14 <b>A. Yes.</b> 15 Q. Pre-sentence report, licence and details of any 16 conditions. 17 Over the page to page 8: and then a section for 18 young offenders. 19 So that's the form that is completed? 20 <b>A. Correct.</b> 21 Q. And if the public protection casework section agrees 22 with the recall request and approves it, the recall is 23 then made, as you say, within a couple of hours? 24 <b>A. If it's an emergency.</b> 25 Q. If it's an emergency process?</p> <p style="text-align: center;">Page 25</p>	<p>1 tape? 2 <b>A. Yes.</b> 3 Q. And that they were assessed as items that could together 4 be used to make a hoax sue sides belt? 5 <b>A. Could be, yes.</b> 6 Q. Now, before I ask you about your conversation with her 7 that day, can I ask you some general questions. 8 You've confirmed that Sudesh Amman had been 9 consistently graded as presenting a high risk of serious 10 harm to the general public. 11 <b>A. Correct.</b> 12 Q. That was including in the latest OASys assessment, 13 December 2019? 14 <b>A. Yes.</b> 15 Q. And also in the MAPPA risk-management plans in each set 16 of MAPPA minutes? 17 <b>A. Yes.</b> 18 Q. Are you also aware that according to a letter that was 19 drafted but not sent by Ms Vigurs of the Probation 20 Service on 13 January, Ms Vigurs said that he was likely 21 to be raised to a very high risk rating? 22 <b>A. I had seen that letter, yes.</b> 23 Q. Does a very high risk rating mean that the risk is 24 imminent and likely? 25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 27</p>
<p>1 <b>A. Yes.</b> 2 Q. May we then move on to 31 January 2020. We know that on 3 that Friday Sudesh Amman bought a set of items which 4 were individually innocuous but which had been 5 identified in extremist publications as the sorts of 6 items which could be used to make a hoax suicide belt. 7 Are you aware of that? 8 <b>A. I was aware of the materials bought, yes.</b> 9 Q. Can you take it from me that we've heard evidence from 10 police officers; they've been identified in extremist 11 publications as items which could collectively be used 12 to make a hoax suicide belt? 13 <b>A. Correct.</b> 14 Q. We also know, don't we, that such hoax suicide belts 15 have been used in other prominent terror attacks in the 16 UK in recent years? 17 <b>A. I'm aware of the Fishmongers' Hall one, but I'm not</b> 18 <b>aware of others.</b> 19 Q. You're not aware that in the London Bridge and Borough 20 Market attacks of mid-2017 the attackers were wearing 21 fake suicide belts? 22 <b>A. I wasn't aware of that, no.</b> 23 Q. We also know that investigation team drew to the 24 attention of Ms Heckroodt on that day the items which 25 had been purchased, the drink bottles, foil and parcel</p> <p style="text-align: center;">Page 26</p>	<p>1 Q. Are you aware that those assessment were informed by two 2 ERG reports which specifically highlighted the risk of 3 Sudesh Amman carrying out an attack in the form of 4 a stabbing? 5 <b>A. I hadn't seen the ERG reports but I understand that was</b> 6 <b>the case, yes.</b> 7 Q. Are you also aware that the attacks where people have 8 worn hoax suicide belts have been stabbing attacks? 9 <b>A. Yes.</b> 10 Q. Are you aware that there was extensive prison 11 intelligence indicating Sudesh Amman retained 12 an extremist mindset and had repeatedly expressed 13 a desire to carry out an attack? 14 <b>A. That was the case.</b> 15 Q. Would you agree that based on all that information, this 16 was an extremely dangerous man? 17 <b>A. Yes.</b> 18 Q. Now, taking account of that background, and the 19 information about the purchases, let me ask you some 20 questions. For the purposes of these questions, please 21 ignore for the moment the question whether a recall 22 referring to the purchases would compromise a police 23 investigation in any way. I'll ask you about that later 24 but ignore it for the moment. 25 Would you accept that a probation officer could</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 reasonably say, given the information from the police</p> <p>2 and that background, that Sudesh Amman was actively</p> <p>3 thinking about re-offending?</p> <p>4 <b>A. Possibly, yes.</b></p> <p>5 Q. If a probation officer did form that view, would you</p> <p>6 accept that Sudesh Amman could have been recalled to</p> <p>7 prison by the emergency process?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Now, if there were a concern about basing a recall</p> <p>10 decision in this instance on the purchases and that that</p> <p>11 might inform Sudesh Amman about the surveillance, what</p> <p>12 would you say to the suggestion that that was simply</p> <p>13 a price worth paying, given that he could then have been</p> <p>14 kept in prison for quite a long time?</p> <p>15 <b>A. That would have been a balanced decision in consultation</b></p> <p>16 <b>with the police. I don't -- I don't believe that it</b></p> <p>17 <b>would have been merited, that the information that we</b></p> <p>18 <b>had we couldn't share -- couldn't be shared.</b></p> <p>19 Q. Why is that?</p> <p>20 <b>A. The -- the overriding memory I have of that conversation</b></p> <p>21 <b>is that the police surveillance operation had to be</b></p> <p>22 <b>protected at all costs.</b></p> <p>23 Q. We'll come to that in a second about what was actually</p> <p>24 said in the conversation. Just taking it as a matter of</p> <p>25 principle first of all. Do you have a very dangerous</p> <p style="text-align: center;">Page 29</p>	<p>1 <b>A. If there's a reason to do that, yes.</b></p> <p>2 Q. If there had been a concern in this instance about</p> <p>3 basing a recall decision on the intelligence which had</p> <p>4 been given to Ms Heckroodt, what would you say to the</p> <p>5 suggestion that the information about the items he'd</p> <p>6 purchased could have been obtained by having his room</p> <p>7 searched by probation hostel staff?</p> <p>8 <b>A. That was part of the discussion I had with Carina that</b></p> <p>9 <b>day.</b></p> <p>10 Q. Again, we'll get to the discussion in a moment, but just</p> <p>11 as matter of general principle, if you have a terrorist</p> <p>12 offender who has been witnessed by a surveillance team</p> <p>13 buying these concerning purchases, and everyone says:</p> <p>14 it's a proper basis for recall; we don't want to</p> <p>15 compromise the police operation. Would the answer in</p> <p>16 principle be: let have his room searched, we'll find the</p> <p>17 items and we can justify the recall decision without</p> <p>18 having to blow the surveillance operation?</p> <p>19 <b>A. So that's possible. But in the conversation I had with</b></p> <p>20 <b>Carina -- but you don't want to go there.</b></p> <p>21 Q. We're going there in a moment.</p> <p>22 <b>A. Okay.</b></p> <p>23 Q. I'm just asking you about what would have been possible</p> <p>24 or justified just looking at the facts.</p> <p>25 <b>A. It would have been a tactic used by the</b></p> <p style="text-align: center;">Page 31</p>
<p>1 man on the streets?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. The prospect of putting him back in prison for up to</p> <p>4 20 months, what will you say to the suggestion that</p> <p>5 short-term compromise of a surveillance operation is</p> <p>6 a price worth paying?</p> <p>7 <b>A. I guess we have to look at the longer term as well in</b></p> <p>8 <b>terms of at the end of that 20 months he would have come</b></p> <p>9 <b>out without any supervision and could indeed, if we'd</b></p> <p>10 <b>followed that course, come out, if the Parole Board had</b></p> <p>11 <b>released him, within three or four months. There was no</b></p> <p>12 <b>guarantee he would be kept in for those 20 months.</b></p> <p>13 Q. That reasoning seems to suggest that there's a positive</p> <p>14 benefit to keeping him on licence in the community</p> <p>15 rather than recalling him to prison?</p> <p>16 <b>A. As a probation officer that's our aim, is to bring about</b></p> <p>17 <b>change and rehabilitate people, balanced with the public</b></p> <p>18 <b>protection.</b></p> <p>19 Q. In this instance we've heard quite a bit of evidence</p> <p>20 both from the police and from Ms Heckroodt that they</p> <p>21 were looking for a basis for recall, if justified in</p> <p>22 order to protect the public by taking an extremist</p> <p>23 dangerous man off the streets.</p> <p>24 Might that sometimes be the view taken by probation</p> <p>25 officers?</p> <p style="text-align: center;">Page 30</p>	<p>1 <b>Probation Service to establish concrete evidence, yes.</b></p> <p>2 Q. Sometimes in police and other law enforcement</p> <p>3 situations, police may seek to parallel --</p> <p>4 <b>A. Yes.</b></p> <p>5 Q. -- the results of secret intelligence by obtaining the</p> <p>6 same information or facts via means which they can</p> <p>7 reveal?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. If we now turn to your involvement on 31 January.</p> <p>10 First of all, before you received Carina Heckroodt's</p> <p>11 call that day, what, if any, knowledge of Sudesh Amman</p> <p>12 did you have?</p> <p>13 <b>A. I had been aware, prior to his release, of the intention</b></p> <p>14 <b>of police to write to the governor to see if he could be</b></p> <p>15 <b>detained. I'd been in some conversations with Carina</b></p> <p>16 <b>and her colleagues about the placement, the premises</b></p> <p>17 <b>selected. That was prior to release. I'd had no</b></p> <p>18 <b>contact with Carina since his release.</b></p> <p>19 Q. Did you know that a letter had been drafted by Ms Vigurs</p> <p>20 that we referred to earlier --</p> <p>21 <b>A. I'd seen -- I'd seen that draft, yes.</b></p> <p>22 Q. Which again seemed to be supporting the police in their</p> <p>23 concern to have Mr Amman kept in prison?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. During all those pre-release discussions, did you</p> <p style="text-align: center;">Page 32</p>



<p>1 actually take any decisions or were you simply being 2 informed about what was going on? 3 <b>A. No, I had no operational accountability for that.</b> 4 Q. We know that that evening, or we know from Carina 5 Heckroodt's evidence that she recalls on that Friday 6 evening, 31 January, calling you. Do you recall her 7 calling you at that time? 8 <b>A. I do.</b> 9 Q. What information did she give you? 10 <b>A. She reiterated the conversation that she'd had with the 11 police in regards to the items purchased. We talked 12 through --</b> 13 Q. Sorry, just a second. Did she also tell you that 14 Sudesh Amman had been seen looking at knives? 15 <b>A. I can't recall that.</b> 16 Q. Go on, please. 17 <b>A. So there was -- the scenario that I took from a call was 18 that he had purchased -- we definitely knew about some 19 items he purchased and there was uncertainty if he had 20 maybe purchased other things, and we then got into the 21 options of how we could begin to explore, whether we 22 could gather other evidence to support the concerns 23 expressed.</b> 24 Q. What options were looked at in that call or discussed? 25 <b>A. So the room search was the predominant one. I also</b></p> <p style="text-align: center;">Page 33</p>	<p>1 search. Would that have been a room search conducted by 2 staff of the probation hostel? 3 <b>A. Quite possibly, yes, that's -- that would be routine and 4 as part of a stay at an approved premises would be your 5 room would be subject to search.</b> 6 Q. It could be presented as routine? 7 <b>A. Yes.</b> 8 Q. Now, we've heard evidence that residents at 9 Sudesh Amman's probation hostel were told that their 10 rooms could be searched every two weeks? 11 <b>A. Yes, that's part of the approved premises rules, that 12 they would be subject to room search.</b> 13 Q. We've also heard that Sudesh Amman's room hadn't been 14 searched between 23 January and 31 January. You may not 15 know? 16 <b>A. No.</b> 17 Q. But if nine days had passed without a room search, would 18 you accept it would have been easy to justify a routine 19 room search? 20 <b>A. Quite possibly, yes.</b> 21 Q. And a routine room search of that kind wouldn't indicate 22 that Sudesh Amman was under surveillance, would it? 23 <b>A. Well, that was the -- that was what I was exploring with 24 Carina, that I didn't think that it would, but there 25 were -- I know there was concerns that it might.</b></p> <p style="text-align: center;">Page 35</p>
<p>1 <b>suggested engaging with him on his return to the 2 approved premises to engage in conversation about where 3 he'd been, what he'd done that day, because it was a new 4 area for him, just showed sort of an interest.</b> 5 <b>I also --</b> 6 MR JUSTICE HILLIARD: Just pause there. Do you mean -- just 7 to ask him in case he said, "I've been shopping"? Is 8 that the kind of thing you mean? 9 <b>A. Yes, well -- if he said, "I've been on Streatham Common 10 all day", and we knew he'd been shopping, that would 11 have increased our sort of investigation.</b> 12 MR JUSTICE HILLIARD: Or alternatively he might say, "I've 13 been shopping. I bought some things I needed", all of 14 which might explain something or not? 15 <b>A. Yes. The Columbo technique is the phrase that we -- 16 I would use.</b> 17 MR HOUGH: Then, any other options you considered? 18 <b>A. I think the last one was just for the -- you know, if 19 there was uncertainty about what had been purchased in 20 some stores or if anything had been purchased, for 21 police to go into those stores to ask the question, 22 "This individual was in there. Did he buy anything? 23 What did he buy?" I accepted that it was unlikely they 24 would wish to do that given the operation in place.</b> 25 Q. Looking at each of those in turn, first of all, a room</p> <p style="text-align: center;">Page 34</p>	<p>1 Q. Why was it that it was thought that a room search -- 2 ANNOUNCER: A one-minute silence for the shooting in 3 Plymouth. 4 MR JUSTICE HILLIARD: All right, Mr Hough, I have already 5 said that each of us can do that at another time for 6 ourselves is the better way so that we don't interrupt. 7 It's not a lack of respect of any kind at all. Anyone 8 who wants to do that can do that later, but we're in the 9 middle of a hearing so we're going to carry on. All 10 right? 11 MR HOUGH: Thank you, sir. 12 I was just going to ask you: if there had been 13 a room search which had been presented as routine, 14 perhaps conducted on quite a number of residents' rooms, 15 that surely wouldn't have suggested to Sudesh Amman that 16 he was particularly being targeted because he was under 17 police surveillance? 18 <b>A. You'd have to ask the police, that but my understanding 19 is they -- they were concerned that he was testing 20 whether he was under surveillance or not, so this would 21 have been another element where, if he was searched on 22 that night, that might have helped confirm his view that 23 he was under surveillance.</b> 24 Q. But you said certainly your own initial view -- 25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 36</p>

<p>1 Q. -- was that it wouldn't compromise any --</p> <p>2 <b>A. There was certainly scope to do a routine room search</b></p> <p>3 <b>yes.</b></p> <p>4 ANNOUNCER: The one-minute silence has now ended. Thank</p> <p>5 you.</p> <p>6 MR JUSTICE HILLIARD: So it could presumably be said to the</p> <p>7 whole hostel or whatever, "As you all know and you were</p> <p>8 told when you came, we do a routine search one time in</p> <p>9 every fortnight; now is the time"?</p> <p>10 <b>A. Yes.</b></p> <p>11 MR HOUGH: The other suggestion you made, having somebody</p> <p>12 speak to Sudesh Amman in again a routine or off-the-cuff</p> <p>13 way, you've indicated that that might lead him to lie</p> <p>14 about where he had been?</p> <p>15 <b>A. Well, I think there's a number of avenues there.</b></p> <p>16 <b>I think yes, it may indicate that, but it also may have</b></p> <p>17 <b>given him an opportunity, if he was conflicted about</b></p> <p>18 <b>what he was thinking, to have that discussion.</b></p> <p>19 Q. Certainly if he did lie, that might provide further</p> <p>20 support for a recall, mightn't it?</p> <p>21 <b>A. Well, it was certainly taking a slightly different</b></p> <p>22 <b>avenue in terms of the investigation, yes.</b></p> <p>23 Q. If you have somebody who's made these purchases, these</p> <p>24 concerning purchases, and he lies about where he's been,</p> <p>25 that certainly suggests he's thinking about offending.</p> <p style="text-align: center;">Page 37</p>	<p>1 Sudesh Amman posed?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. Would you accept also that by this stage the management</p> <p>4 of the risk Sudesh Amman posed was at least proving</p> <p>5 difficult to manage?</p> <p>6 <b>A. It was still manageable. It was obviously becoming more</b></p> <p>7 <b>complex, but it was still manageable, as I think that</b></p> <p>8 <b>I was aware on Friday afternoon.</b></p> <p>9 Q. Certainly a member of the public standing back might say</p> <p>10 that if somebody required round-the-clock armed</p> <p>11 surveillance with two armed response vehicles in backup</p> <p>12 and a counter-terrorist arrest team in backup, that that</p> <p>13 is suggesting that their management in the community is</p> <p>14 really quite difficult.</p> <p>15 <b>A. Yes, I'd -- I wasn't aware that the surveillance team</b></p> <p>16 <b>was armed at that point, with that level of ...</b></p> <p>17 Q. Did you have any further discussion with Ms Heckroodt in</p> <p>18 that call? Was anything else covered?</p> <p>19 <b>A. I -- I suggested that she speak to people, the public</b></p> <p>20 <b>protection casework section to alert them to the raising</b></p> <p>21 <b>concerns or rising concerns and also to test their view</b></p> <p>22 <b>on thresholds for recall.</b></p> <p>23 Q. Was there also discussion of possibly recalling him to</p> <p>24 prison if he committed a very minor breach of licence</p> <p>25 like being a few minutes late for --</p> <p style="text-align: center;">Page 39</p>
<p>1 doesn't it?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. What was the outcome of the discussion about those</p> <p>4 options? How did you leave matters with Carina?</p> <p>5 <b>A. Well, I got the impression from Carina that she had</b></p> <p>6 <b>explored a lot of those options with the police already,</b></p> <p>7 <b>but she was going to go back to the police and talk them</b></p> <p>8 <b>further, and that we both agreed that, you know, even if</b></p> <p>9 <b>they weren't deployed now, they could be deployed at</b></p> <p>10 <b>a point in the future.</b></p> <p>11 Q. Did you have any discussion with Carina Heckroodt about</p> <p>12 whether the threshold for recall had been met at that</p> <p>13 time?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. What did you each say?</p> <p>16 <b>A. Well, I agreed with her assessment that probably the</b></p> <p>17 <b>threshold for recall had not been reached at that point,</b></p> <p>18 <b>hence the view we took through these options to try and</b></p> <p>19 <b>explore the situation further.</b></p> <p>20 Q. Is it right that in answer to my earlier questions you</p> <p>21 accept that another probation officer could reasonably</p> <p>22 have formed the view that the threshold for recall had</p> <p>23 been reached?</p> <p>24 <b>A. In regard to?</b></p> <p>25 Q. Based upon the purchases, in context of the risk</p> <p style="text-align: center;">Page 38</p>	<p>1 <b>A. There was, yes.</b></p> <p>2 Q. What was the outcome of that discussion?</p> <p>3 <b>A. Well, I think we agreed that, you know, that would give</b></p> <p>4 <b>us a clear reason to recall.</b></p> <p>5 Q. Was that something else that she was going to speak to</p> <p>6 the public protection casework section about?</p> <p>7 <b>A. As I understood it, yes.</b></p> <p>8 Q. Is there anything else you recall from your discussion</p> <p>9 with Ms Heckroodt beyond what you've told us so far?</p> <p>10 <b>A. No, apart from the overriding impression I was left with</b></p> <p>11 <b>was that any action that we'd taken -- we didn't</b></p> <p>12 <b>want to take any action that would compromise the police</b></p> <p>13 <b>operation.</b></p> <p>14 Q. Did you play any further part between that conversation</p> <p>15 and the attack on the Sunday lunchtime?</p> <p>16 <b>A. No.</b></p> <p>17 MR HOUGH: Thank you very much. Those are all my questions.</p> <p>18 Questions by MR MENON</p> <p>19 MR MENON: Good morning, Mr Reid. I ask questions on behalf</p> <p>20 of the family of Sudesh Amman.</p> <p>21 Can I start with the final point you made just now,</p> <p>22 which was that your overriding impression of that</p> <p>23 conversation that you had with Carina Heckroodt on</p> <p>24 31 January last year was that the number 1 priority was</p> <p>25 not to compromise the police covert operation; is that</p> <p style="text-align: center;">Page 40</p>

<p>1 right?</p> <p>2 <b>A. I wouldn't describe it as the number 1 priority, but any</b></p> <p>3 <b>action that we were to take that risked compromising the</b></p> <p>4 <b>operation was not in favour.</b></p> <p>5 Q. Did you know, either prior to that conversation or as</p> <p>6 a result of that conversation, that there was at least</p> <p>7 some evidence, if not considerable evidence, that the</p> <p>8 covert operation had already been compromised?</p> <p>9 <b>A. I wasn't aware of that, no.</b></p> <p>10 Q. Did you know that Sudesh Amman had been engaging in what</p> <p>11 the police believe was at least possibly</p> <p>12 counter-surveillance for a number of days since</p> <p>13 26 January; do you know that?</p> <p>14 <b>A. No, I didn't know that.</b></p> <p>15 Q. Did you know that the police had seen him engage in</p> <p>16 behaviour, for example, entering shops, sort of</p> <p>17 wandering around, leaving without buying anything, that</p> <p>18 they thought was potentially Mr Amman engaging in</p> <p>19 reconnaissance?</p> <p>20 <b>A. I think they were -- as I understood it, they thought he</b></p> <p>21 <b>was testing their surveillance. I didn't know about</b></p> <p>22 <b>reconnaissance.</b></p> <p>23 Q. And finally, jumping ahead, and I appreciate that this</p> <p>24 is with the benefit of hindsight, but the very fact that</p> <p>25 he, on 2 February, stole a knife, ran out of the shop at</p> <p style="text-align: center;">Page 41</p>	<p>1 again. In fact, let's put it on the screen, INQ003678.</p> <p>2 Page 9, please.</p> <p>3 If we blow up paragraph 4.3.9, the wording is quite</p> <p>4 clear:</p> <p>5 "Offender managers must consider whether to seek</p> <p>6 recall in cases where an offender has breached the</p> <p>7 conditions of their licence ..."</p> <p>8 So that's possibility number 1, yes?</p> <p>9 <b>A. Mm-hm.</b></p> <p>10 Q. "... the offender's behaviour indicates that they</p> <p>11 present an increased or unmanageable risk of [serious</p> <p>12 harm to the public] ..."</p> <p>13 That's possibility number 2?</p> <p>14 <b>A. Mm-hm.</b></p> <p>15 Q. "... or there is an imminent risk of further offences</p> <p>16 being committed."</p> <p>17 That's possibility number 3, yes?</p> <p>18 <b>A. Mm-hm.</b></p> <p>19 Q. Then 4.3.11, please. In case that wasn't clear enough,</p> <p>20 the guidance and framework then goes on to say that:</p> <p>21 "Offender managers must consider whether to seek</p> <p>22 recall in cases where they have reason to believe ..."</p> <p>23 Very generous language, if I can put it that way?</p> <p>24 <b>A. Mm-hm.</b></p> <p>25 Q. "... that an offender is actively thinking about</p> <p style="text-align: center;">Page 43</p>
<p>1 speed, removing the knife from its packaging and</p> <p>2 stabbing a member of the public within seconds as</p> <p>3 opposed to buying the knife and finding a later</p> <p>4 opportunity to inflict as much harm as possible, that</p> <p>5 provides the clearest possible evidence that he believed</p> <p>6 that he was under covert surveillance. Do you agree</p> <p>7 with that? If you can't answer it, please say so.</p> <p>8 <b>A. No, I don't think I can answer that.</b></p> <p>9 Q. Very well.</p> <p>10 Now, I was going to start by asking you questions</p> <p>11 about the law and the guidance and the practice on</p> <p>12 recall, but in fact Mr Hough has covered it</p> <p>13 comprehensively. Can I just summarise it in this way</p> <p>14 and see if we can agree on this.</p> <p>15 The threshold, the evidential threshold, that</p> <p>16 an offender manager within the Probation Service needs</p> <p>17 to satisfy before initiating the recall procedure, is</p> <p>18 plainly a modest one, isn't it?</p> <p>19 <b>A. Mm.</b></p> <p>20 Q. The probation officer does not have to be sure about</p> <p>21 anything, does he or she, to start this?</p> <p>22 <b>A. On balance, they would have to be convinced, I think, if</b></p> <p>23 <b>they were going to take recall action.</b></p> <p>24 Q. They don't have to be convinced of anything. I'll just</p> <p>25 go back -- I'll just read out the relevant sentence</p> <p style="text-align: center;">Page 42</p>	<p>1 re-offending."</p> <p>2 Yes? So the probation officer is entitled, and is</p> <p>3 in fact required to by this document, to try to put</p> <p>4 himself or herself into the mind of the offender and</p> <p>5 determine from their behaviour whether there is reason</p> <p>6 to believe that the offender is actively thinking about</p> <p>7 re-offending; yes?</p> <p>8 <b>A. And to have a basis for doing that, yes.</b></p> <p>9 Q. Yes. And you are aware that this issue has been</p> <p>10 litigated in the courts?</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. Where offenders have challenged both the decision to</p> <p>13 recall by the Secretary of State, the process having</p> <p>14 been initiated by a probation officer, and had</p> <p>15 challenged subsequent decisions by the Parole Board to</p> <p>16 effectively endorse the recall and prevent immediate</p> <p>17 release; yes?</p> <p>18 <b>A. Correct.</b></p> <p>19 Q. And you are aware that the courts have said on a number</p> <p>20 of occasions that all the decision-maker requires,</p> <p>21 whether it's the probation officer or whether it's the</p> <p>22 Secretary of State, is a reasonable basis or reasonable</p> <p>23 grounds for believing that one of these three</p> <p>24 possibilities has been triggered. That's right, isn't</p> <p>25 it?</p> <p style="text-align: center;">Page 44</p>

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<p>1 <b>A. Yes.</b></p> <p>2 Q. And so that is clearly a modest state of mind that the</p> <p>3 probation officer has to be satisfied of; would you</p> <p>4 agree?</p> <p>5 <b>A. I agree.</b></p> <p>6 Q. Thank you.</p> <p>7 And in respect of recall, it can be triggered, can't</p> <p>8 it, at any time during the period that the offender is</p> <p>9 on licence, isn't it?</p> <p>10 <b>A. Correct.</b></p> <p>11 Q. And it's irrespective of whether -- whatever the police</p> <p>12 may decide to do. In other words, if the police decide</p> <p>13 not to arrest somebody, the probation officer can</p> <p>14 initiate the recall process; yes?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. If the police do decide to arrest somebody, irrespective</p> <p>17 of whether that arrest results in a charge, the</p> <p>18 Probation Service can initiate the recall process post</p> <p>19 arrest as well can't they?</p> <p>20 <b>A. Correct.</b></p> <p>21 Q. Depending on its general view of the circumstances; yes?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Now, turning then to the specific conversation that you</p> <p>24 had with Carina Heckroodt -- and I apologise in advance</p> <p>25 that some of this may be repetitive but, I think it's so</p> <p style="text-align: center;">Page 45</p>	<p>1 Q. We know and the jury knows that there was a joint</p> <p>2 operational team meeting that Carina Heckroodt attended</p> <p>3 two weeks prior to Mr Amman's release on 9 January. Did</p> <p>4 you know about that?</p> <p>5 <b>A. No.</b></p> <p>6 Q. She never told you that a police officer at that meeting</p> <p>7 had said that it was a question of when Mr Amman would</p> <p>8 commit a terrorist attack as opposed to if he would</p> <p>9 commit an attack? You didn't know that?</p> <p>10 <b>A. No.</b></p> <p>11 Q. Of course, you knew about the anti-surveillance that the</p> <p>12 police had observed --</p> <p>13 <b>A. I --</b></p> <p>14 Q. -- in this case?</p> <p>15 <b>A. I didn't know about that until the call on Friday.</b></p> <p>16 Q. On the call, so by the end of the call you knew about</p> <p>17 that?</p> <p>18 <b>A. Yes.</b></p> <p>19 Q. At least in general terms?</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. And you knew about the purchases, of course, which is</p> <p>22 the most important thing?</p> <p>23 <b>A. Yes.</b></p> <p>24 Q. I think you didn't know about the fact that he had shown</p> <p>25 interest in particular parts of shops where either</p> <p style="text-align: center;">Page 47</p>
<p>1 important that I just want to be absolutely clear what</p> <p>2 your state of mind was by the end of the conversation</p> <p>3 when you agreed with what she was suggesting. Okay?</p> <p>4 So you knew that this was a young man who had been</p> <p>5 convicted of multiple terrorist offences involving the</p> <p>6 dissemination and possession of terrorist material; yes?</p> <p>7 <b>A. Yes.</b></p> <p>8 Q. You knew that he had received, following his guilty</p> <p>9 pleas, a sentence of 14 months' imprisonment?</p> <p>10 <b>A. Yes.</b></p> <p>11 Q. You knew that there was no evidence to suggest that he</p> <p>12 had been deradicalised in prison?</p> <p>13 <b>A. Correct.</b></p> <p>14 Q. You knew, in fact, that the evidence suggested that he</p> <p>15 had been further radicalised in prison; yes?</p> <p>16 <b>A. I didn't know the case well enough to say that, but</b></p> <p>17 <b>I understood that to be the case.</b></p> <p>18 Q. Well, that was the view by all the relevant agencies --</p> <p>19 <b>A. Yes.</b></p> <p>20 Q. -- who were involved in his supervision; is that fair?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. In other words, the prison, the psychologist, the</p> <p>23 Probation Service, the police, all believed that he had</p> <p>24 been further radicalised in prison; is that right?</p> <p>25 <b>A. Correct.</b></p> <p style="text-align: center;">Page 46</p>	<p>1 knives were for sale or hand tools that could</p> <p>2 potentially be used as weapons, you didn't know about</p> <p>3 that?</p> <p>4 <b>A. I didn't know about that.</b></p> <p>5 Q. Anything else that I've missed that you knew by the end</p> <p>6 of that phone conversation when you ended up agreeing</p> <p>7 with Ms Heckroodt?</p> <p>8 <b>A. No.</b></p> <p>9 Q. Did she mention to you during that phone conversation</p> <p>10 that she had been -- that the police had said anything</p> <p>11 to her to the effect that they did have a power to</p> <p>12 arrest Mr Amman for preparing a terrorist act but had</p> <p>13 decided that they would rather not do so and would</p> <p>14 prefer to continue with covert armed surveillance</p> <p>15 together with armed backup and the like rather than</p> <p>16 exercise that power that they had available to them; do</p> <p>17 you know that?</p> <p>18 <b>A. I don't think I knew that, no. I don't recall that.</b></p> <p>19 Q. Now, if you had been told that, in other words, that the</p> <p>20 police actually do have a power of arrest here but they</p> <p>21 don't want to use it, they'd rather we recall than</p> <p>22 compromise their surveillance operation, would that have</p> <p>23 had any impact on the fact that you eventually agreed</p> <p>24 with Ms Heckroodt that the recall threshold had not been</p> <p>25 reached, the fact that the police had a power of arrest</p> <p style="text-align: center;">Page 48</p>

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<p>1 as a result of those purchases but did not wish to 2 exercise it?</p> <p>3 <b>A. I don't know if we discussed that. Thinking about it 4 now, if -- if the power of arrest had not been 5 exercised, that would suggest to me that the police 6 didn't feel they had enough to arrest.</b></p> <p>7 Q. Yes. Well, that's actually not the case. Can 8 I interrupt you. Let me be clear. You see, there are 9 two possibilities here for the police, right, in terms 10 of their decision-making. One is that they conclude: we 11 have a power of arrest, in other words, there are 12 reasonable grounds to arrest Mr Amman on suspicion of 13 preparing a terrorist act, but we don't wish to exercise 14 it for strategic reasons?</p> <p>15 <b>A. Yes.</b></p> <p>16 Q. That's one possibility.</p> <p>17 The second possibility is that: in fact, we don't 18 even have a power of arrest, it's not enough, we haven't 19 got enough evidence yet to arrest him.</p> <p>20 The jury know -- you may not know this -- but the 21 jury know from a senior police officer who was part of 22 that decision-making that the police had concluded there 23 was a power of arrest, but for strategic reasons they 24 didn't wish to exercise it. You know, but that's the 25 conclusion they had reached.</p> <p style="text-align: center;">Page 49</p>	<p>1 sufficient evidence to charge. One doesn't know whether 2 the vest would have been found constructed in his room, 3 one doesn't know whether he would have confessed in 4 interview or said something incriminating in interview. 5 One simply doesn't know.</p> <p>6 But going back to the point, and this is the 7 question: if you had been told that the police had 8 concluded that there was a power of arrest, would you 9 have reached the same conclusion as to recall?</p> <p>10 <b>A. I think the -- what's not been said is that the -- as 11 has just been explained in terms of the power of arrest, 12 that would have exposed the surveillance operation. If 13 we could have proceeded to recall with the information 14 that we had but couldn't share, that similarly would 15 have exposed the covert operation and we may not have 16 got far with the recall.</b></p> <p>17 Q. But surely we can agree with this, Mr Reid, that the 18 number 1 priority of all concerned must be the 19 protection of the public; yes? That's much more 20 important than compromising the surveillance operation. 21 Can we agree with that?</p> <p>22 <b>A. Well, you'd have to ask the police that.</b></p> <p>23 Q. I mean, you, as a senior probation officer, I mean, do 24 you not agree with that?</p> <p>25 <b>A. Well, the paramount is the protection of the public,</b></p> <p style="text-align: center;">Page 51</p>
<p>1 MR JUSTICE HILLIARD: You are right, you're absolutely 2 right, but there's just one other element of that, isn't 3 there, that I think may bear on this, that HA6, I think, 4 was saying that: yes, there was a power of arrest in the 5 sense that there was a reasonable suspicion to justify 6 an arrest but his concern, I think he was saying, 7 Mr Menon, was that he didn't think a charge would result 8 or a prosecution. Obviously the position is different 9 there because the evidence has to be such as will 10 establish in due course so that a jury are sure 11 an offence is committed. I think just -- he was 12 accepting, as you say, reasonable suspicion, but saying 13 he didn't think that would get anywhere, if I'm 14 remembering it right.</p> <p>15 MR MENON: Yes, that's absolutely correct --</p> <p>16 MR JUSTICE HILLIARD: Just so that -- and then as you say, 17 quite rightly, the concern was: well, if we arrest him, 18 that there's not going to be a charge, he'll just be 19 released and we'll have given away the covert nature of 20 what was -- you're quite right, but I think there's that 21 extra element which I think on the line you're on 22 might --</p> <p>23 MR MENON: You're absolutely right and you'll recall, sir, 24 I put to the officer that that was speculative and that 25 one doesn't know pre-arrest whether you're going to have</p> <p style="text-align: center;">Page 50</p>	<p>1 <b>I think that at the time there was the very strict 2 measures in place to manage that.</b></p> <p>3 Q. But, look --</p> <p>4 MR JUSTICE HILLIARD: There may not be, as it were, 5 opposites, may there? That's, I think, one of the 6 considerations.</p> <p>7 MR MENON: Yes.</p> <p>8 MR JUSTICE HILLIARD: But maintaining the efficacy of the 9 police operation may actually be a factor in protecting 10 the public, I'm not --</p> <p>11 MR MENON: Yes, I agree.</p> <p>12 MR JUSTICE HILLIARD: It may be that there's not a straight 13 choice. Maybe that's one of the difficulties in the 14 case.</p> <p>15 MR MENON: Yes, I understand that. And that's quite right. 16 But let me go on and say this then, and I am -- just 17 so you know, I have accepted throughout this inquest 18 that the surveillance officers on 2 February did what 19 they could under incredibly difficult circumstances to 20 protect the public and manage the risk posed by 21 Mr Amman. But ultimately, they couldn't manage it 22 because two members of the public were stabbed and 23 seconds later Mr Amman was shot and killed. Now 24 I appreciate, if they hadn't acted as quickly as they 25 had, maybe more would have been stabbed and maybe more</p> <p style="text-align: center;">Page 52</p>

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<p>1 would have died, but we can certainly say can't we, with 2 the benefit of hindsight, that the risk wasn't managed 3 because two people were stabbed? 4 <b>A. With the benefit of hindsight --</b> 5 Q. Yes. And I would go further and say that when the 6 decision was made on 31 January to not exercise that 7 power of arrest, that's the police, and not recall, 8 that's the Probation Service, that both those decisions 9 were missed opportunities that ultimately placed the 10 public at serious risk. In other words, the wrong call 11 was made. Do you understand? That's what I suggest. 12 <b>A. I stand by the fact that at that time on the Friday 13 afternoon I didn't think there was sufficient to recall, 14 based on new information available but also based on the 15 fact that he'd responded positively on release. As 16 I understood it, he'd engaged with the offender manager, 17 he'd engaged with other people in relation to his 18 release in the community, and his behaviour was 19 certainly not experienced in the approved premises as it 20 was in custody.</b> 21 Q. And is that still your view, given all the additional 22 information that you've now been provided that was 23 available to decision-makers at the time, you think that 24 decision not to recall was the correct one? 25 <b>A. At that point on the Friday, I think that was correct</b></p> <p style="text-align: center;">Page 53</p>	<p>1 <b>the police.</b> 2 Q. That is what I was going to come to. So even though the 3 probation officer wouldn't have a role to play in terms 4 of licence conditions if he served the full sentence, 5 now there are two other regimes that apply, don't they? 6 Firstly, there are the notification requirements? 7 <b>A. Yes.</b> 8 Q. Which is a system that is in place for the next ten 9 years, I believe, isn't it? 10 <b>A. Depending on the sentence.</b> 11 Q. Depending on his sentence. Maybe it's less, given his 12 sentence, but anyway, for a number of years -- 13 <b>A. Yes.</b> 14 Q. -- where he has to comply with a number of what I call 15 notification requirements because he's been convicted of 16 terrorist offences? 17 <b>A. Yes.</b> 18 Q. In addition to that, if he is deemed by those who make 19 these decisions -- and I appreciate this is not the 20 Probation Service -- to be of such risk, he can be 21 placed on something called a TPIM, can't he, a terrorism 22 prevention and investigation measure, that further 23 controls his behaviour even after he's served the full 24 term in prison? 25 <b>A. So those exist. They would be applied for through the</b></p> <p style="text-align: center;">Page 55</p>
<p>1 <b>one.</b> 2 Q. But now, knowing -- 3 <b>A. Well.</b> 4 Q. Well, it's not knowledge that we've gained subsequently, 5 it's -- it's the full sum total of the information that 6 was available to the police and the Probation Service on 7 31 January which I've tried to summarise, I hope fairly 8 to you. Do you still stand by that decision that you 9 and Ms Heckroodt made not to initiate the recall 10 procedure? 11 <b>A. I do, yes.</b> 12 Q. Now, finally this. 13 You said that part of the consideration that one has 14 to bear in mind is that even if an offender is recalled, 15 and the Parole Board endorses that recall, eventually 16 Mr Amman will have to be released unless he's charged 17 with a further offence? 18 <b>A. Correct.</b> 19 Q. Once he's completed his full 40-month sentence. And you 20 said then that at that stage, obviously, he's now done 21 the full 40 months, there's no licence now. 22 <b>A. Yes.</b> 23 Q. He's simply going to be at large without any conditions 24 placed on him at all; yes? 25 <b>A. He would be subject to a notification order managed by</b></p> <p style="text-align: center;">Page 54</p>	<p>1 <b>courts.</b> 2 Q. Yes. There's, of course, a regime in place for that? 3 <b>A. Yes.</b> 4 Q. But my point is it's not simply that if he had done the 5 full 40 months he was going to be released and nobody 6 would be watching or paying him any interest thereafter. 7 That's not the case, is it? 8 <b>A. No, so I mean I guess what we didn't know at that time 9 is if he had gone back for the 40 months, the 10 notification order, the requirements are fairly limited, 11 as I understand them, and whether a TPIM would have been 12 granted or not, again --</b> 13 Q. Whether a TPIM can be granted depends on the 14 intelligence and the circumstances at that time? 15 <b>A. Yes.</b> 16 Q. But if he is deemed to be as high a risk as he clearly 17 was upon his release in January 2020, in other words 18 it's simply a question of when not if, they may have had 19 powers to impose one of those terrorism prevention and 20 investigation measures, I suggest, and it would have 21 controlled his behaviour? 22 <b>A. As I understand it, that could have been applied for 23 prior to his release.</b> 24 MR MENON: Prior to his release as well. Thank you very 25 much.</p> <p style="text-align: center;">Page 56</p>

<p>1 Questions by MR SHELTON</p> <p>2 MR SHELTON: Good morning, Mr Reid. My name is Neil Sheldon</p> <p>3 and I act for the Metropolitan Police.</p> <p>4 I'd like to ask you a couple of questions, please,</p> <p>5 about the option of searching the approved premises.</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. Which, as you explained to Mr Hough, was one of the</p> <p>8 options that you discussed with Carina Heckroodt on that</p> <p>9 Friday afternoon?</p> <p>10 <b>A. Indeed.</b></p> <p>11 Q. Now, it was suggested to you during the course of</p> <p>12 questions that this would be a routine search of the</p> <p>13 approved premises, but if I've understood you correctly</p> <p>14 what we're talking about here is a pretend routine</p> <p>15 search?</p> <p>16 <b>A. Yes.</b></p> <p>17 Q. In other words, a routine search that has been directed</p> <p>18 by the police which the AP staff pretend is routine; is</p> <p>19 that right?</p> <p>20 <b>A. Yes, it would be routine for residents to have their</b></p> <p>21 <b>room searched. Obviously this would be predicated on</b></p> <p>22 <b>information made available to them at that time, when</b></p> <p>23 <b>the decision was made to do that search.</b></p> <p>24 Q. Yes. So somebody tells the AP staff --</p> <p>25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 57</p>	<p>1 an unusual thing to find in an offender's room, would</p> <p>2 it?</p> <p>3 <b>A. Quite.</b></p> <p>4 Q. So would there need to be some briefing given to the</p> <p>5 searchers about what had been purchased and what they</p> <p>6 should be looking for?</p> <p>7 <b>A. So, yes. So that's what I mean. That would have</b></p> <p>8 <b>exposed, potentially, the operation.</b></p> <p>9 Q. I'm simply asking you because this was an option that</p> <p>10 you discussed with Carina Heckroodt and I'm just trying</p> <p>11 to understand whether you were envisaging that the AP</p> <p>12 staff who would be asked to search would be given some</p> <p>13 sort of briefing about the covert operation that had</p> <p>14 identified the suspect purchases. It seems to me you</p> <p>15 envisage that would happen?</p> <p>16 <b>A. I don't think -- I don't think they would have had the</b></p> <p>17 <b>full disclosure of that, but they would have needed</b></p> <p>18 <b>guidance on maybe what to look for.</b></p> <p>19 Q. I see.</p> <p>20 <b>A. So if that's --</b></p> <p>21 Q. No, no, that's helpful.</p> <p>22 What, if any, risks might that raise?</p> <p>23 <b>A. Well, if he had already had weapons, they may be also</b></p> <p>24 <b>stored in his room, so potentially he could have</b></p> <p>25 <b>attacked staff. But given that we didn't believe that</b></p> <p style="text-align: center;">Page 59</p>
<p>1 Q. -- that a search of Mr Amman's room is desirable?</p> <p>2 <b>A. Yes.</b></p> <p>3 Q. And, "Please can you dress that up in some way as</p> <p>4 a routine search, perhaps involving other people's</p> <p>5 rooms, to throw him off the scent?"</p> <p>6 <b>A. Quite possibly yes.</b></p> <p>7 Q. I see.</p> <p>8 MR JUSTICE HILLIARD: Would you actually need to do all that</p> <p>9 or could someone at a higher level of the</p> <p>10 Probation Service just say, "Please do the routine</p> <p>11 search"?</p> <p>12 <b>A. Yes, you could do that, but again trying to protect the</b></p> <p>13 <b>surveillance operation, you would have to maybe do two</b></p> <p>14 <b>or three searches or something like that to show that he</b></p> <p>15 <b>wasn't targeted.</b></p> <p>16 MR SHELTON: What, if anything, would you need to tell them</p> <p>17 about what to look for?</p> <p>18 <b>A. Well, they would -- anything suspicious. Anything that,</b></p> <p>19 <b>you know, would not normally be in a room, you wouldn't</b></p> <p>20 <b>expect to find in a room. Again, bearing in mind the</b></p> <p>21 <b>requirements to protect the police operation, whether we</b></p> <p>22 <b>could have been specific about, "If you find this, this,</b></p> <p>23 <b>and this" -- I would imagine if the vest had been made</b></p> <p>24 <b>up that would be fairly obvious, but --</b></p> <p>25 Q. Yes. But four bottles of fizzy drink wouldn't be</p> <p style="text-align: center;">Page 58</p>	<p>1 <b>was the case ...</b></p> <p>2 <b>There are risks that, you know, staff would have</b></p> <p>3 <b>either found things and not known what they were.</b></p> <p>4 <b>They're not trained specifically to look for certain</b></p> <p>5 <b>items and make those links. But there was -- you know,</b></p> <p>6 <b>there's a potential that somebody doesn't want their</b></p> <p>7 <b>room searched and becomes violent.</b></p> <p>8 Q. Certainly. And what, if any, training do the staff</p> <p>9 employed by Hestia, the charity that ran this particular</p> <p>10 approved premises, have in handling that sort of</p> <p>11 situation?</p> <p>12 <b>A. I'm afraid I don't -- I don't know.</b></p> <p>13 Q. What about the evidential significance of anything</p> <p>14 found? So, let's say, the approved premises staff found</p> <p>15 fizzy drink bottles and tin foil and masking tape,</p> <p>16 parcel tape in the room. What if Mr Amman subsequently</p> <p>17 denied that they were his, or said that he didn't put</p> <p>18 them there? Can you help with what the significance</p> <p>19 would be of that situation?</p> <p>20 <b>A. So I think if they found them in his room, there would</b></p> <p>21 <b>be an assumption that they were his. I think that</b></p> <p>22 <b>the -- if they were individual items, then probably they</b></p> <p>23 <b>would not have raised much concern, but as I said, if it</b></p> <p>24 <b>had been at the time when he'd either started</b></p> <p>25 <b>manufacturing or had made the belt, then clearly that</b></p> <p style="text-align: center;">Page 60</p>

1 **would have exposed that.**  
 2 Q. Is there a standard operating procedure or a set of  
 3 guidelines for use in this situation, namely where  
 4 approved premises staff were co-opted into  
 5 a counter-terrorism investigation?  
 6 **A. Not that I'm aware of.**  
 7 Q. How often in your experience does it happen?  
 8 **A. It -- well, it would happen on that sort of routine**  
 9 **basis the rooms are searched. I'm not aware that there**  
 10 **had been directed searches on the basis of covert**  
 11 **intelligence gathered. I've certainly not been**  
 12 **approached like that.**  
 13 Q. You've not been approached?  
 14 **A. I've not been approached in regard to that. But it**  
 15 **quite possible that Carina or others in her position**  
 16 **around the country would be -- the responsibility for**  
 17 **that would be the first point of call.**  
 18 Q. Then can you just finally help me with this. You were  
 19 asked a number of questions about recall and the  
 20 possibility of Mr Amman being recalled for a further  
 21 20 months to prison. Let's say the approved premises  
 22 staff went into his room --  
 23 **A. Yes.**  
 24 Q. -- and they found the items that he had bought earlier  
 25 on the Friday, four bottles of fizzy drink, tin foil and

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1 masking, and let's imagine that when asked what he was  
 2 doing with them he said, "I'm planning to drink the  
 3 Irn-Bru, and I'm planning to use the tin foil to wrap up  
 4 the mutton curry my mother gave me on Wednesday, the  
 5 chicken I bought yesterday, and I'm going to use the  
 6 tape to fix my suitcase", or something else, what  
 7 happens then just as a matter of practice? Can you help  
 8 me?  
 9 **A. So I don't think that would have led to any further**  
 10 **action. I think that, you know, as I said earlier in**  
 11 **terms of those options that we were looking at, we were**  
 12 **just looking to open other avenues of investigation, but**  
 13 **if that was the response and we had nothing else to**  
 14 **suggest that it was anything other than that, then I'm**  
 15 **not sure what further action could have been taken.**  
 16 Q. Yes, because I mean we're talking here about -- at  
 17 least, the scenario that was put to you, we're talking  
 18 here about locking somebody up for 20 months.  
 19 **A. Yes.**  
 20 Q. And I just want to try and understand, from your  
 21 experience because I have none, how realistic that  
 22 scenario is in the circumstances that I've just  
 23 described: three, on the face of it, everyday items with  
 24 potentially perfectly innocent explanations. Can you  
 25 help me?

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1 **A. So, as I say, I don't think on balance we would have**  
 2 **recalled, even if we'd found confirmation of what was**  
 3 **reported to us in the covert way, so I think that -- you**  
 4 **know, as I think I said earlier, the balance is about**  
 5 **trying to get, you know, the public protection right,**  
 6 **obviously, but also the rehabilitation of a long-term**  
 7 **change in an offender, and what was reported to me on**  
 8 **the Friday was that there had been good engagement in**  
 9 **the time since release from prison. I wasn't aware of**  
 10 **some of the concerns now raised, but even the concerns**  
 11 **that were raised, I don't believe we were at a point on**  
 12 **that Friday, even if a room search had identified those**  
 13 **items in his room and confirmed what had been purchased,**  
 14 **that we would have been able to move to recall.**  
 15 Q. Yes.  
 16 **A. But it may have opened up other avenues for exploration.**  
 17 MR SHELDON: Thank you very much, Mr Reid. Those are all my  
 18 questions.  
 19 Questions by MR RAWAT  
 20 MR RAWAT: Good morning, Mr Reid. As you know I'm here on  
 21 behalf of Her Majesty's Prison and Probation Service.  
 22 I'm going to try and put my questions to you not to  
 23 go over ground that's been covered sometimes rather  
 24 extensively by others, but I think inevitably we will  
 25 touch upon some of the topics that you've been asked.

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1 **A. Yes.**  
 2 Q. Trying to take them in some sort of order, when you were  
 3 being asked questions by Mr Hough, you mentioned  
 4 a recall dossier. Is that a dossier that's put together  
 5 by the public protection casework section as part of the  
 6 process of recalling an offender to prison?  
 7 **A. So that dossier is for the Parole Board, so it would**  
 8 **include some of the documents that are listed in that**  
 9 **Part A for the recall and the risk assessments,**  
 10 **et cetera.**  
 11 Q. So the Part A document that probation completes --  
 12 **A. Yes.**  
 13 Q. -- and which begins the process, the job of the  
 14 probation officer is to make a recommendation for recall  
 15 that then goes to the public protection casework  
 16 section; that's right, isn't it?  
 17 **A. Yes.**  
 18 Q. They authorise recall?  
 19 **A. Yes.**  
 20 Q. But as Mr Hough showed you, in that Part A document you  
 21 have to write in the reasons --  
 22 **A. Yes.**  
 23 Q. And so, in a case like this, care would have to be taken  
 24 as to the extent to which reasons could be put in that  
 25 Part A document; is that right?

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<p>1 <b>A. Indeed, yes.</b></p> <p>2 Q. Because the Part A document could be one of those</p> <p>3 documents that's actually given to an offender?</p> <p>4 <b>A. Yes, yes.</b></p> <p>5 Q. Now, you've been asked about whether you knew about</p> <p>6 powers of arrest.</p> <p>7 Just to try and move it from the speculative to</p> <p>8 perhaps the evidence that the jury has heard. When</p> <p>9 Ms Heckroodt gave her evidence, she told the jury that</p> <p>10 on 31 January she'd been contacted by DI Sarah Bundock</p> <p>11 of SO15. We haven't heard from that officer in the</p> <p>12 course of this inquest, but what Ms Heckroodt was told</p> <p>13 was that the police had suspicion that Mr Amman's</p> <p>14 purchases either indicated that he planned to make</p> <p>15 a fake suicide vest or that he was testing to see if he</p> <p>16 was under surveillance.</p> <p>17 Now, you've been asked at length about fake suicide</p> <p>18 vests, but can you confirm, just so that we're clear,</p> <p>19 that you were also told by Ms Heckroodt that the police</p> <p>20 thought he might just simply be testing whether he was</p> <p>21 under surveillance?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. Ms Heckroodt wasn't told other than that the purchases</p> <p>24 might be a way of testing surveillance. She wasn't told</p> <p>25 what other activity he was engaging in.</p> <p style="text-align: center;">Page 65</p>	<p>1 have discovered the vest having been manufactured, but</p> <p>2 given that Mr Amman was, as we now know, engaged in</p> <p>3 anti-surveillance tactics and that he was aware that his</p> <p>4 room could be searched routinely, doesn't it make it</p> <p>5 less likely that he would have, before 2 February,</p> <p>6 manufactured a vest?</p> <p>7 <b>A. I assume so, but --</b></p> <p>8 Q. Because his room could have been searched at any time,</p> <p>9 couldn't it?</p> <p>10 <b>A. Yes, yes.</b></p> <p>11 Q. So it's more likely, isn't it, that in a search what AP</p> <p>12 staff would have seen was items that can be lawfully</p> <p>13 purchased and for which, as Mr Sheldon put to you, he</p> <p>14 could advance a plausible explanation?</p> <p>15 <b>A. Indeed.</b></p> <p>16 Q. And if he had advanced that explanation, it wouldn't</p> <p>17 have advanced the position that you and Ms Heckroodt had</p> <p>18 taken on recall any further, would it?</p> <p>19 <b>A. I don't believe so, no.</b></p> <p>20 Q. And that would have been the same even if, to follow up</p> <p>21 on one of your suggestions, there had been a pretend</p> <p>22 room search, one instigated with the hope of confirming</p> <p>23 what items he had in his room?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. You could have just found soft drinks?</p> <p style="text-align: center;">Page 67</p>
<p>1 <b>A. Right.</b></p> <p>2 Q. And so it follows, doesn't it, that you didn't have any</p> <p>3 information about what other activity he might be</p> <p>4 engaging in in terms of anti-surveillance?</p> <p>5 <b>A. Correct, yes.</b></p> <p>6 Q. You've also been asked about room searches and I just</p> <p>7 want to sort of clarify a little bit more about that.</p> <p>8 You've explained -- and tell me if I've</p> <p>9 misunderstood this -- that an AP will conduct routine</p> <p>10 searches on a fortnightly basis, and if you are placed</p> <p>11 in approved premises you will be told when you arrive</p> <p>12 that your room will be subject to a room search?</p> <p>13 <b>A. Correct, yes, as part of the approved premises rules.</b></p> <p>14 Q. You just need to keep your voice up.</p> <p>15 <b>A. It's part of the approved premises rules, the sort of</b></p> <p>16 <b>individual compact that individuals sign when they come</b></p> <p>17 <b>into the approved premises.</b></p> <p>18 Q. And that means, doesn't it, that Sudesh Amman, when he</p> <p>19 arrived at the approved premises, would have been aware</p> <p>20 that at some time during his time there his room might</p> <p>21 be subject to a room search --</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. -- by AP staff?</p> <p>24 Would that not have -- you mentioned or explored the</p> <p>25 possibility that if a search was conducted, they might</p> <p style="text-align: center;">Page 66</p>	<p>1 <b>A. Yes, yes. I mean, the purpose of suggesting that was</b></p> <p>2 <b>obviously the intention to clarify whether suicide belt</b></p> <p>3 <b>had been made or not made.</b></p> <p>4 Q. But if that was the purpose, as you've explained, and</p> <p>5 you were using AP staff who, as Ms Heckroodt told the</p> <p>6 jury, are not trained in covert searches, their job</p> <p>7 is -- all they can do is go and -- her evidence was that</p> <p>8 the primary purpose of a room search is to look for</p> <p>9 health -- to see either that they don't have items they</p> <p>10 shouldn't have --</p> <p>11 <b>A. Yes.</b></p> <p>12 Q. -- or for health and safety reasons. So they are not</p> <p>13 trained search operatives, are they?</p> <p>14 <b>A. No.</b></p> <p>15 Q. Particularly if they're not trained to do covert</p> <p>16 searches.</p> <p>17 In circumstances there, where you are thinking, well</p> <p>18 there's a possibility he might have done something</p> <p>19 nefarious with these items, would that have required you</p> <p>20 to carry out some sort of risk assessment before you</p> <p>21 asked AP staff to do it?</p> <p>22 <b>A. Very likely, yes.</b></p> <p>23 Q. And you've explained you might not have given the AP</p> <p>24 staff full disclosure about what the purpose of the</p> <p>25 search was, but before you told them anything, would you</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 have consulted with the police?</p> <p>2 <b>A. Yes, indeed.</b></p> <p>3 Q. And there is a risk, isn't there, with a search like</p> <p>4 this, of Mr Amman becoming violent with AP staff?</p> <p>5 <b>A. Quite possibly, yes.</b></p> <p>6 Q. And if you are risk assessing it and there is a risk of</p> <p>7 violence, what other steps could you have put in?</p> <p>8 <b>A. Well, it might have been to ask the police to -- either</b></p> <p>9 <b>be present or jointly do the search.</b></p> <p>10 Q. Well, if you had asked the police to be present or to do</p> <p>11 the search, would that, in your assessment, have raised</p> <p>12 the risk of compromising the police operation?</p> <p>13 <b>A. I would imagine so. Again, that's probably a question</b></p> <p>14 <b>for the police.</b></p> <p>15 Q. Could we have on the screen, please, INQ003678, page 9.</p> <p>16 If we could just expand the bottom paragraph, 4.3.14,</p> <p>17 please.</p> <p>18 You've been taken to parts of this section of the</p> <p>19 guidance that probation officers have and this bit deals</p> <p>20 with recall of determinate sentence offenders.</p> <p>21 I just want to ask your help with this paragraph:</p> <p>22 "Where the offender manager is satisfied that,</p> <p>23 should the offender no longer be remanded, s/he can be</p> <p>24 released immediately with no increase in ..."</p> <p>25 "RoSH" means "risk of serious harm", doesn't it?</p> <p style="text-align: center;">Page 69</p>	<p>1 another you may not?</p> <p>2 <b>A. Correct, yes.</b></p> <p>3 Q. Let's look at the last part of it. It says:</p> <p>4 "The test for recall does not require the criminal</p> <p>5 standard of evidence, and it is instead based on the</p> <p>6 offender manager's professional judgment [go to the next</p> <p>7 page] as to whether, on the balance of probabilities,</p> <p>8 the reported behaviour has taken place, or other risk</p> <p>9 factors have increased."</p> <p>10 The reason I want to draw your attention to this is</p> <p>11 "on the balance of probabilities" that's referred to</p> <p>12 here. You have been a member of the probation officer,</p> <p>13 I think, for some considerable time. You've been</p> <p>14 involved in managing terrorist offenders in the</p> <p>15 community; that's right, isn't it?</p> <p>16 <b>A. Correct.</b></p> <p>17 Q. And when, in the course of your evidence, you've used</p> <p>18 phrases like "on balance", is it your understanding as</p> <p>19 to how the guidance operates that you need to</p> <p>20 consider -- that in deciding whether or not to recall,</p> <p>21 the assessment is made on the balance of probabilities?</p> <p>22 <b>A. Yes. Yes.</b></p> <p>23 Q. Now, if we turn to the 31st, and your conversation with</p> <p>24 Ms Heckroodt, you've gone through what you knew at the</p> <p>25 time. So the information you had was that police</p> <p style="text-align: center;">Page 71</p>
<p>1 <b>A. Yes.</b></p> <p>2 Q. "... to the public, or risk of re-offending then recall</p> <p>3 may not be considered appropriate."</p> <p>4 So does that not point to the fact that when making</p> <p>5 a recall decision, it's not automatic, is it? That, for</p> <p>6 example, if someone is late by a minute or so to curfew,</p> <p>7 it doesn't automatically lead to recall, does it?</p> <p>8 <b>A. No, no, and it usually wouldn't.</b></p> <p>9 Q. And so a decision to recall is one that is a matter of</p> <p>10 professional judgment; is that right?</p> <p>11 <b>A. Correct.</b></p> <p>12 Q. You have to, in making that professional judgment, weigh</p> <p>13 up all the information that is available to you?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. And that's indicated in the next sentence isn't it:</p> <p>16 "This must be assessed on a case-by-case basis."</p> <p>17 So, when considering whether to recall, it is</p> <p>18 a decision based on the circumstances of the individual</p> <p>19 case --</p> <p>20 <b>A. Yes.</b></p> <p>21 Q. -- is that right?</p> <p>22 <b>A. Yes.</b></p> <p>23 Q. There might be circumstances in two cases that look</p> <p>24 similar which result in a different outcome, so in one</p> <p>25 situation you may decide to recommend recall and in</p> <p style="text-align: center;">Page 70</p>	<p>1 suspicions were that it was either a fake suicide vest</p> <p>2 or testing surveillance; that's right, isn't it?</p> <p>3 <b>A. Correct.</b></p> <p>4 Q. What you also knew was up until that point Sudesh Amman</p> <p>5 had been compliant with his licence conditions?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. What you also knew was that he had a substantial number</p> <p>8 of licence conditions, which were stringent; is that</p> <p>9 right?</p> <p>10 <b>A. Indeed, yes.</b></p> <p>11 Q. And that there was what you were aware of, that he was</p> <p>12 under police surveillance?</p> <p>13 <b>A. Yes, I was aware.</b></p> <p>14 Q. I just want to be clear so that the jury understand what</p> <p>15 information you had at the time that you expressed your</p> <p>16 opinion.</p> <p>17 Other than the matters I've just summarised there,</p> <p>18 was there anything else that any other information that</p> <p>19 you were given in that phone call that informed the view</p> <p>20 that you expressed to Carina Heckroodt?</p> <p>21 <b>A. No, I don't think so.</b></p> <p>22 Q. And your assessment was that there wasn't a proper basis</p> <p>23 to recommend recall; is that right?</p> <p>24 <b>A. That we could use.</b></p> <p>25 Q. When you say that "we could use", why do you use that</p> <p style="text-align: center;">Page 72</p>

<p>1 term?</p> <p>2 <b>A. Because the information in relation to the -- anything</b></p> <p>3 <b>that was used to jeopardise -- that would sort of expose</b></p> <p>4 <b>the covert operation, the police were not happy for us</b></p> <p>5 <b>to use that, as I understood it.</b></p> <p>6 Q. So does it follow that if you had wanted to take matters</p> <p>7 forward, it would have involved consulting the police in</p> <p>8 any event?</p> <p>9 <b>A. Yes.</b></p> <p>10 Q. Again, keeping it to what you knew at the time, does it</p> <p>11 remain your view -- I think you've said it does -- that</p> <p>12 there was no proper basis to recall at that time?</p> <p>13 <b>A. Correct.</b></p> <p>14 Q. You have, as you've said, been involved in managing</p> <p>15 terrorist offenders in the community for a number of</p> <p>16 years.</p> <p>17 <b>A. Yes.</b></p> <p>18 Q. And you are the national security lead, aren't you?</p> <p>19 <b>A. I was, yes.</b></p> <p>20 Q. You've been involved in decisions to recall other</p> <p>21 terrorist offenders in the past, presumably?</p> <p>22 <b>A. I guess I have to properly describe my role as more of</b></p> <p>23 <b>a consultant for the likes of Carina around the country</b></p> <p>24 <b>to talk through and check out actions that they're maybe</b></p> <p>25 <b>considering taking, but yes.</b></p> <p style="text-align: center;">Page 73</p>	<p>1 involves taking a balance between what you know and the</p> <p>2 risks that you're facing; yes?</p> <p>3 <b>A. Yes, yes.</b></p> <p>4 Q. You said in answer to questions from me originally that</p> <p>5 you did not consider that the threshold for recall had</p> <p>6 been passed based on the information about the</p> <p>7 purchases.</p> <p>8 <b>A. Right.</b></p> <p>9 Q. You've reiterated that.</p> <p>10 But you also said to me that a reasonable person</p> <p>11 applying the recall test could have taken a different</p> <p>12 view, could have decided that a recall was justified;</p> <p>13 that's right, isn't it?</p> <p>14 <b>A. Yes, it's -- it's broader than the information</b></p> <p>15 <b>available, that specific information, it's a contextual</b></p> <p>16 <b>thing.</b></p> <p>17 Q. Just to be clear, what you said to me -- and I just want</p> <p>18 to make clear that this is still your position -- is</p> <p>19 that while you didn't take the view as a matter of</p> <p>20 professional judgment that recall was justified based on</p> <p>21 the information you had, another reasonable person with</p> <p>22 all the facts, with the same set of facts and the same</p> <p>23 test to apply, could have taken a different view?</p> <p>24 <b>A. Could have done, yes.</b></p> <p>25 Q. Next, the question of an overt room search.</p> <p style="text-align: center;">Page 75</p>
<p>1 Q. But you have been involved in those sort of decisions --</p> <p>2 <b>A. Correct.</b></p> <p>3 Q. -- before you spoke to Carina Heckroodt about Sudesh</p> <p>4 Amman?</p> <p>5 <b>A. Yes.</b></p> <p>6 Q. If there had been sufficient information, in your view</p> <p>7 and in your assessment, that would have formed a proper</p> <p>8 basis for recall, would you have hesitated to put</p> <p>9 forward that or to make that recommendation?</p> <p>10 <b>A. No, no.</b></p> <p>11 Q. Because, whilst you said that one of the purposes of the</p> <p>12 Probation Service is to maintain people in the</p> <p>13 community, you do that because you have public</p> <p>14 protection in mind, don't you?</p> <p>15 <b>A. Yes, yes, indeed.</b></p> <p>16 Q. And if public protection -- if there was enough</p> <p>17 information to warrant a recall in order to protect the</p> <p>18 public, that's a step that would have been taken?</p> <p>19 <b>A. Absolutely.</b></p> <p>20 MR RAWAT: Thank you. I've nothing further.</p> <p>21 Questions by MR HOUGH</p> <p>22 MR HOUGH: Just a small number of final questions from me,</p> <p>23 Mr Reid.</p> <p>24 First of all, the recall decision. You've told us,</p> <p>25 including in the last answers, that the recall decision</p> <p style="text-align: center;">Page 74</p>	<p>1 It has been put to you that there were all sorts of</p> <p>2 difficulties and considerations to make with regard to</p> <p>3 having approved premises staff make a search of</p> <p>4 Sudesh Amman's room.</p> <p>5 But it's right, isn't it, that on 31 January it</p> <p>6 occurred to you independently that that is something</p> <p>7 that might be a good idea?</p> <p>8 <b>A. Yes.</b></p> <p>9 Q. Did you have in mind, when you thought that that might</p> <p>10 be a good idea, asking the approved premises staff</p> <p>11 simply to carry out a search of Sudesh Amman's room, and</p> <p>12 potentially other rooms, without giving detailed reasons</p> <p>13 about the underlying surveillance operation?</p> <p>14 <b>A. That was the conversation that Carina and I had, yes.</b></p> <p>15 Q. Your idea wasn't to tell the approved premises staff all</p> <p>16 the details of the surveillance operation --</p> <p>17 <b>A. No.</b></p> <p>18 Q. -- what had been communicated.</p> <p>19 Your idea was simply to say, "Let's have a room</p> <p>20 search and present it as routine"?</p> <p>21 <b>A. Yes.</b></p> <p>22 Q. Given that you were looking for material which the</p> <p>23 police had told you about, presumably you would have</p> <p>24 been telling those staff to report everything they</p> <p>25 found, including ordinary domestic purchases?</p> <p style="text-align: center;">Page 76</p>

1 **A. Yes.**  
 2 Q. And if an approved premises member of staff found these  
 3 items and reported it, would there be any difficulty  
 4 with that person then making a statement, a factual  
 5 statement, which could be included in support of  
 6 a recall decision, or indeed provided to the police?  
 7 **A. Yes, I think that's reasonable.**  
 8 Q. Now, finally this. You placed some reliance a few times  
 9 on the fact that Sudesh Amman, in the eight days or so  
 10 between his release and 31 January, had been compliant  
 11 with his licence conditions and had been polite and  
 12 perfectly decent with his offender manager.  
 13 **A. That's what I understood, yes.**  
 14 Q. Is it right that some offenders, including terrorist  
 15 offenders, manage deceptive compliance, so apparent  
 16 compliance, while actually being intent of terrorist  
 17 acts for a lot longer than eight days?  
 18 **A. Quite possibly, yes.**  
 19 Q. Were you aware, for example, that the Fishmongers' Hall  
 20 attacker, Usman Khan, managed to comply very well with  
 21 his stringent licence conditions for practically a year  
 22 before he committed a terrorist atrocity?  
 23 **A. Indeed.**  
 24 MR HOUGH: Yes, thank you very much, those are all the  
 25 questions we have for you. Thank you for coming to give

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1 evidence.  
 2 THE WITNESS: Thank you.  
 3 MR JUSTICE HILLIARD: Thank you very much.  
 4 (The witness withdrew)  
 5 MR HOUGH: Sir, subject to anything you may have to say,  
 6 that's the end of our evidence.  
 7 MR JUSTICE HILLIARD: Yes, thank you.  
 8 All right, members of the jury, so that completes  
 9 the evidence. So the obvious question is what's left?  
 10 Well, there are a number of legal issues that I have to  
 11 consider with the interested persons, and those legal  
 12 matters are for me and so you don't need to be here for  
 13 that. Then I will sum the case up to you before you  
 14 consider your decisions.  
 15 So that we're definitely ready for you, I'm going to  
 16 say Wednesday morning, all right? I will sum matters up  
 17 to you then.  
 18 So what that means is you're not required more today  
 19 or tomorrow. But I am going to say, if it's convenient  
 20 to all of you, is it all right if we say 9.30 on  
 21 Wednesday morning? Is that all right for everyone?  
 22 Yes? All right.  
 23 Just one other thing. We anticipated that the  
 24 inquest would finish this week, but just suppose it took  
 25 a bit longer, something went wrong later this week or we

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1 lost time through illness or anything like that, could  
 2 you just let the usher know before you go if you're also  
 3 available for the early part of next week, if it came to  
 4 it, just so I have that information? All right?  
 5 So 9.30 Wednesday, and just let the usher know  
 6 outside, before you go, if it would be all right, if it  
 7 came to it, for the early part of next week.  
 8 All right?  
 9 So thank you all very much indeed and I'll see you  
 10 at 9.30 on Wednesday.  
 11 (In the absence of the jury - Extracted)  
 12 (12.10 pm)  
 13 (The hearing adjourned until  
 14 Tuesday, 17 August 2021 at 9.30 am)

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