Protocol on the Questioning of Witnesses in Oral Hearings under Rule 10 of the Inquiry Rules 2006

Introduction

1. This Protocol sets out the approach to questioning witnesses at the Inquiry's hearing in **October 2026.** The Inquiry's aim is to ensure a fair, effective, and transparent questioning process in line with Rule 10 of the Inquiry Rules 2006, avoiding duplication of questioning by RLRs, and ensuring the effective use of Inquiry time and resources, consistent with the Inquiry's duties and the principles of proportionality.

2. This Protocol should be read in conjunction with the updated hearings page for October, which can be found on the Inquiry's website here.

Rule 10 of the Inquiry Rules 2006 - who can ask questions?

3. Under Rule 10(1) of the Inquiry Rules 2006, as a general rule, only Counsel to the Inquiry or the Inquiry panel (in this case, the Chair) may ask questions of a witness giving oral evidence at an Inquiry hearing. This is because a public inquiry is not a trial where two sides are presenting arguments; it is an investigative process.

4. Save as set out at 4(a) and (b) below, witnesses at the October 2026 hearing will be asked questions by Counsel to the Inquiry or the Chair.
    a. The Chair *intends to* permit a limited number of Recognised Legal Representatives (RLRs) to ask questions directly of the **expert** witnesses called to give oral evidence. Questioning of the experts will be subject to paragraph 5, below, and proposed questions must be submitted to the Inquiry in advance, in accordance with paragraphs 8 to 10 of this protocol. The Inquiry will confirm separately the Chair's determination as to which RLRs will be permitted to ask questions and the arrangements for that questioning. The Chair may direct that RLRs work collaboratively.
    b. As previously, the Chair *may* permit RLRs to ask some further questions of non-expert witnesses at the end of Counsel to the Inquiry's questions. This will be determined by the Chair on a case-by-case basis. For example, the Chair *may*

allow further questioning by an RLR where she has decided that such questioning will allow a particular witness to give their best evidence.

5. Any such questioning, whether directed at an expert or non-expert witness if permitted, will be subject to the arrangements set out below at Annex A to this protocol. The questioning will be limited to the particular issue(s) or lines of questioning for which permission has been granted and strictly limited in time as set out in Annex A, unless the Chair directs otherwise. If the Chair permits one RLR to ask questions, it does not follow that all RLRs will be granted permission. As such, where more than one RLR considers, for example, that an issue has been insufficiently addressed, the Chair may only give permission for one of them to pose questions.

Provision of Evidence

6. Before each Hearing, Core Participants will receive access to the evidence that may be referred to within the Hearing. Legally represented Core Participants will be able to access the evidence electronically via the Relativity disclosure platform. Core Participants who are not legally represented will be given access by a separate method.

7. Separate communications have been issued in relation to the provision and review of evidence.

Submission and Review of Questions

8. If RLRs do wish to submit lines of questioning or issues that they consider a particular witness should be asked about (including expert witnesses), these must be submitted to the Inquiry no later than **10 working days before that witness is timetabled to give evidence.** For the avoidance of doubt, a table of deadlines will be provided with the hearing timetable.

9. Lines of questioning should be submitted in the form set out in the Proforma that accompanies this protocol by email to legal@lampardinquiry.org.uk. Pursuant to Rule 10(5), the form is to include:

a. A clear, succinct description of the issues to be raised with the witness.
b. A clear explanation of the relevance of those issues to the particular witness.
c. Where applicable, a list identifying any document(s) and specific parts of documents to be shown to the witness in relation to each issue or line of questioning. These should be identified by reference to Inquiry document identification numbers or, in the case of a transcript of a previous hearing, by date, page and line numbers.
d. Questions should directly relate to the evidence in the witness hearing bundles. Each question **must** provide specific references to the relevant evidence within the hearing bundle.
e. The form must be submitted as a Microsoft Word document. The font type and size must be **Montserrat (Body), size 10.** Submissions that do not comply with these requirements will be returned for amendment.
f. The form **must not exceed 5 pages** without prior application for permission to the Chair, which will only be granted in exceptional circumstances. Questions on additional pages may not be considered by Counsel to the Inquiry without such permission. The Chair will not permit the recovery of costs for preparing the additional pages without prior approval.
g. CTI may not ask witnesses proposed questions where there has been a failure fully to comply with one or more of (a) to (f) above.

10. Questions submitted for consideration less than **10 working days before the witness is timetabled to give evidence**, will only be considered in exceptional circumstances, and must be accompanied by an explanation and clear justification for the late submission. The Chair will not permit the recovery of costs for preparing the late questions or for making the late application. The process for questions in relation to matters arising during the Hearing itself is outlined below.

11. Receipt of proposed lines of questioning will be acknowledged by email. All submissions and questions will be considered carefully by Counsel to the Inquiry who will assess their relevance and appropriateness but will not revert to the RLR unless there is a particular need to do so, for example to clarify a matter raised. Counsel may also recommend questions to the Chair, who has sole discretion as to whether any question is asked and in what form. The questioning of witnesses will proceed in accordance with the Chair's determinations.

12. This Protocol does not apply to unrepresented Core Participants. However, the Inquiry is keen to ensure that those who engage with it can participate meaningfully. Any unrepresented Core Participant who wishes to raise matters of concern or questions in respect of a witness who is providing evidence to the Inquiry should contact the Inquiry by email at contact@lampardinquiry.org.uk or by leaving a voicemail on 0207 972 3500. A member of the Inquiry team will be in touch to discuss the issues and ensure that these are drawn to the attention of Counsel to the Inquiry. This support is procedural and is intended to assist unrepresented Core Participants in engaging with the process but does not extend to providing advice or advocacy.

Questioning During the Hearing

13. During the October 2026 Hearing, Counsel to the Inquiry will ask any approved questions on behalf of the Core Participants. The Chair may also ask questions. A limited number of RLRs may be permitted to ask questions in accordance with paragraphs 4a and 4b above.

Submission of Rule 10 questions during the course of the Hearing

14. The Inquiry recognises that during the course of oral evidence, new information may emerge which prompts Core Participants to identify further areas on which they consider questions should be asked of a witness.

15. To facilitate this, should the Chair consider it is necessary and appropriate, a ten-minute break may be scheduled at the end of each witness's evidence to allow Counsel to the Inquiry to consider follow up Rule 10 questions arising from that live evidence.

16. All further Rule 10 questions should be submitted by completing a new version of the Proforma that accompanies this Protocol and then sent directly to the Inquiry's legal inbox at legal@lampardinquiry.org.uk.

17. This opportunity is intended for **new questions** arising from **live oral evidence only.** It remains a matter for the Chair and the Inquiry's Legal Team to determine which questions will be asked, having regard to their significance and relevance. This process also applies to any new questions to be asked directly of experts by those RLRs permitted to do so.

18. If Core Participants' legal representatives wish to ask questions directly of a witness, they can make a request in writing during the hearing. The Chair will then decide whether or not to allow the questions and whether it is appropriate for Core Participants to ask these directly or Counsel to the Inquiry.

Questioning by the Witness's Own Legal Representative

19. Under **Rule 10(2)**, if a witness is represented, the Chair *may* allow the witness's own legal representative to ask further questions after Counsel to the Inquiry has concluded. This opportunity is strictly limited to clarification of the witness's oral evidence and must not be used to re-open issues, introduce new substantive matters, or expand the scope of questioning by asking leading questions. A leading question is one that suggests the answer, often prompting the witness to agree rather than to provide their own response.

20. If significant new issues arise from questions asked by the witness's own legal representative, the Chair may instruct Counsel to the Inquiry to question the witness further to clarify those new points.

Proforma for Rule 10 Questions

21. To facilitate the submission of questions, Core Participants should use the Proforma that accompanies to this Protocol which contains relevant guidance on how to complete the form and submit it to the Inquiry.

Conclusion

22. The Chair will periodically review this approach to ensure it remains effective and fair. Any necessary adjustments will be communicated to Core Participants in advance of future hearings.

9 OCTOBER 2026

Annex A: Arrangements for Rule 10 Submissions for Expert Witnesses

The Inquiry's Protocol on the Role and Instruction of Experts and the Protocol on the Questioning of Witnesses in Oral Hearings under Rule 10 of the Inquiry Rules 2006 continue to apply.

For the avoidance of doubt therefore, where Recognised Legal Representatives wish to submit lines of questioning or issues relevant to an expert witness, questions must be submitted in advance in accordance with the Inquiry's Rule 10 protocol and within the deadlines indicated.

Where reasonably practicable, Core Participants with a common interest are expected to liaise and submit joint Rule 10 questions. However, the Inquiry recognises that it may not always be possible for Core Participants to coordinate fully in advance of submissions. In respect of Recognised Legal Representatives for Bereaved Families, RLRs should provide joint submissions in the same groups as previously to avoid repetition.

If Core Participant Recognised Legal Representatives wish to ask questions directly of an expert witness, that request must be clearly set out at the same time as Rule 10 questions are submitted and within the relevant deadline. The Chair may permit Core Participant's Recognised Legal Representatives to ask questions directly of expert witnesses, having regard to the efficient conduct of the hearing, the need to avoid duplication, and the proper understanding of the expert evidence.

Where Recognised Legal Representatives are permitted to ask questions directly of an expert witness, the permission to ask those questions will be limited to questions previously submitted to the Inquiry in line with the Protocol, or questions relating to new matters arising during oral evidence and submitted to the Inquiry's legal inbox during the during the live evidence in the usual way.

Any designation to ask questions under Rule 10 remains a matter for the Chair. Where permission to ask questions directly is granted to a Recognised Legal Representative, questioning **must not** exceed the time limit set in advance by the Chair and must comply with any other directions as the Chair considers appropriate to ensure that it remains focused and proportionate.

Questions **must not exceed 10 minutes in total for each Recognised Legal Representative**, unless otherwise expressly specified in advance by the Chair. This time

limit applies to **all** questions for which permission is granted by the Chair and will not be varied save for exceptional circumstances.

For the Bereaved Families, the Inquiry will invite one Recognised Legal Representative from Hodge Jones & Allen and one Recognised Legal Representative from the remaining Bereaved Family teams to ask questions directly. The relevant family teams should notify the Inquiry in advance of their proposed nominated Recognised Legal Representative(s).

Other Core Participant Recognised Legal Representatives should submit Rule 10 questions in accordance with the Rule 10 Protocol in the usual way, indicating at the same time as they submit those questions, whether they wish to apply to the Chair to ask questions directly of the expert witnesses.