

Public Inquiry into the death of Sheku Bayoh

Closing Submission

on behalf of

The Solicitor General

1. In the opening statement delivered on behalf of the Solicitor General, her commitment to participating in and assisting the inquiry was set out.
2. The Solicitor General's legal team has attended at each of the hearings and the evidence that has emerged has been listened to carefully and analysed.
3. Evidence has been heard about the events at Hayfield Road on 3 May 2015. The Solicitor General does not consider it would be appropriate or helpful to the Inquiry Chair for any submission in relation to this evidence to be made on her behalf. The Solicitor General takes the same view of the evidence heard in relation to cause of death.
4. The reasons for taking this approach were foreshadowed in the opening statement made on behalf of the Solicitor General. In particular, the Solicitor General has in mind her role in the administration of the criminal justice system, and her commitment, in that context, to keep evidence emerging during the Inquiry under review. The Solicitor General considers that the requirement to be seen to act fairly in the performance of that role precludes the provision by her to the Inquiry of a substantive submission at the conclusion of the present cycle of hearings.

5. Later phases of the Inquiry will look at post incident management and at the issue of race. The Solicitor General and her team remain committed to providing whatever assistance they can in relation to these future phases of the Inquiry's work.
  
6. The Solicitor General does not seek to make any oral submissions at this stage.

**Alastair Duncan KC**

**Jennifer Bain KC**

**16 June 2023**