

IN THE SHEKU BAYOH INQUIRY

SUBMISSION

on behalf of

PATRICK CAMPBELL

on

THE APPLICATION FOR RECUSAL ("the Application")

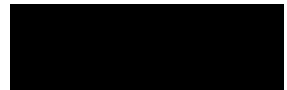
by

(1) THE SCOTTISH POLICE FEDERATION, (2) CRAIG WALKER and (3) NICOLE SHORT

1. Mr. Campbell is grateful for the opportunity to comment on the application in advance of the hearing fixed for 12 and 13 June 2025.
2. In common with other core participants Mr Campbell is keen for the Inquiry to conclude its investigations and publish its report. He considers that fairness - and the appearance of fairness - are of critical importance in any process of public inquiry. In that regard, he believes that he was treated fairly in the course of his evidence, by inquiry counsel, and by the chairman of the inquiry ("the chair") for whom he has the utmost respect.
3. However, following the recent disclosure of minutes of meetings between the chair and Mr Bayoh's family, Mr Campbell has lost a substantial degree of trust and confidence in the inquiry.
4. Whilst it is understood that it may be necessary for a chair to meet with affected families at the outset of an inquiry, Mr Campbell is concerned about the amount and nature of the meetings, the absence of a similar opportunity being extended to other core participants (as far as he is aware), and the circumstances in which the existence of the meetings eventually emerged.
- 5.. Furthermore, it appears that matters that have been the subject of evidence have been discussed outwith the presence of Mr Campbell and other core participants. Such

discussions were not confined to the events that led to Mr Bayoh's death, but have included aspects of post-incident management, an area in which Mr Campbell played an important role.

6. In these circumstances, on the basis of the submissions and documentation produced to date, and with considerable regret, Mr Campbell supports the motion for recusal.

A solid black rectangular box used to redact the signature of the legal representative.

M A MacLeod KC

22 May 2025