

<p>1 Friday 23 July 2021</p> <p>2 (10.15 am)</p> <p>3 THE CHAIRMAN: Good morning, everybody.</p> <p>4 Good morning, Ms Kaufmann.</p> <p>5 Please sit down.</p> <p>6 Good morning, Ms Kaufmann?</p> <p>7 MS KAUFMANN: Good morning, sir.</p> <p>8 MS BLACKWELL: There she is.</p> <p>9 THE CHAIRMAN: For a moment my blood pressure went up, my</p> <p>10 pulse dropped but you are there, thank you.</p> <p>11 MS BLACKWELL: Thank you.</p> <p>12 Good morning, sir.</p> <p>13 The evidence today will come from William Storey and</p> <p>14 Mark Brown. They are poised and waiting in the witness</p> <p>15 box. May they be sworn, please?</p> <p>16 THE CHAIRMAN: They may.</p> <p>17 MR BILL STOREY (sworn)</p> <p>18 MR MARK BROWN (sworn)</p> <p>19 Questions from MS BLACKWELL</p> <p>20 MS BLACKWELL: Thank you, gentlemen.</p> <p>21 Mr Storey, I am going to turn to you first and</p> <p>22 summarise your level of expertise and experience.</p> <p>23 Is your full name William Storey?</p> <p>24 MR STOREY: Yes, sir.</p> <p>25 Q. You are not attending here as an expert witness, but as</p> <p style="text-align: center;">Page 1</p>	<p>1 a subject matter adviser?</p> <p>2 MR STOREY: That's correct, sir.</p> <p>3 Q. At the time you retired from the police, you held the</p> <p>4 rank of detective sergeant, having completed 30 years'</p> <p>5 service?</p> <p>6 MR STOREY: That's correct, sir.</p> <p>7 Q. During that service, you were trained, deployed in and</p> <p>8 supervised and managed a variety of disciplines within</p> <p>9 covert policing and engaged in lawfully authorised</p> <p>10 surveillance activities in the UK?</p> <p>11 MR STOREY: That's correct, sir.</p> <p>12 Q. In 2006 you joined what is now the National Police</p> <p>13 Chiefs' Council, the national covert monitoring user</p> <p>14 group and you have remained a contributing member since</p> <p>15 that time?</p> <p>16 MR STOREY: That's correct, sir.</p> <p>17 Q. In November 2018 you became chair of that group and you</p> <p>18 also currently sit as a member on two other NPCC</p> <p>19 national surveillance user group sub 8 groups?</p> <p>20 MR STOREY: That's correct, sir.</p> <p>21 Q. You are currently working within a covert policing</p> <p>22 environment?</p> <p>23 MR STOREY: Yes, sir.</p> <p>24 Q. Thank you.</p> <p>25 Mr Brown, is your full name Mark Brown?</p> <p style="text-align: center;">Page 2</p>
<p>1 MR BROWN: It is, sir.</p> <p>2 Q. Are you attending here not as an expert witness but</p> <p>3 again as a subject matter adviser?</p> <p>4 MR BROWN: That's correct, sir.</p> <p>5 Q. You are currently employed as the national training</p> <p>6 coordinator at the College of Policing, responsible for</p> <p>7 all training in the technical surveillance disciplines?</p> <p>8 MR BROWN: That's correct, sir.</p> <p>9 Q. Your role involves the training of technical</p> <p>10 surveillance operatives to a nationally agreed standard?</p> <p>11 MR BROWN: That's correct.</p> <p>12 Q. I will not ask you in open session about the forces you</p> <p>13 have worked for or the roles that you have undertaken</p> <p>14 there, because they are the subject of a restriction</p> <p>15 order, but can you confirm, please, that you have been</p> <p>16 responsible for a large number of technical surveillance</p> <p>17 deployments, including the installation of audio devices</p> <p>18 in vehicles?</p> <p>19 MR BROWN: That's correct, sir.</p> <p>20 Q. Thank you very much.</p> <p>21 I am now going for turn to the relevant law and</p> <p>22 guidance applying to the conduct of audio surveillance</p> <p>23 as at 2015.</p> <p>24 Mr Storey, within covert policing, is there</p> <p>25 a national structure in existence to provide guidance</p> <p style="text-align: center;">Page 3</p>	<p>1 and promote standards to ensure that such activities are</p> <p>2 undertaken lawfully and, where prosecution follows, to</p> <p>3 satisfy the courts that, in respect of such activities,</p> <p>4 due consideration has been given to ECHR, articles 2, 6</p> <p>5 and 8?</p> <p>6 MR STOREY: Yes, sir.</p> <p>7 Q. Is that guidance delivered through compliant training</p> <p>8 and is it guided by a number of documents historically</p> <p>9 published by a variety of sources, initially police</p> <p>10 forces, the Association of Chief Police Officers,</p> <p>11 transitionally national police training, National Police</p> <p>12 Improvement Agency and most recently consolidated by the</p> <p>13 College of Policing?</p> <p>14 MR STOREY: Yes, sir.</p> <p>15 Q. Thank you, we will return to training a little later.</p> <p>16 Mr Brown, I would like to explore with you, please,</p> <p>17 the role of the TSU and I would like us to look at</p> <p>18 a College of Policing document that sits behind tab --</p> <p>19 actually I think, no, it is not in our hard copy bundle,</p> <p>20 but I am going to invite Mr Coates to display it. It is</p> <p>21 COP72, please, Mr Coates, and can we go to page 16 of</p> <p>22 that document.</p> <p>23 I am just going to pause, sir. There has been</p> <p>24 a degree of uncertainty as to which documents we are</p> <p>25 able to bring up during the course of this morning's</p> <p style="text-align: center;">Page 4</p>

<p>1 session?</p> <p>2 THE CHAIRMAN: I am aware of that, thank you.</p> <p>3 MS BLACKWELL: In fact it will suffice if I am able to have</p> <p>4 sight of it simply to read into the record the short</p> <p>5 paragraph that I need.</p> <p>6 THE CHAIRMAN: As you wish.</p> <p>7 MS BLACKWELL: Thank you.</p> <p>8 Thank you, sir.</p> <p>9 Mr Brown, you will be familiar with this, and I just</p> <p>10 want to read into the record paragraph 1.2 of this</p> <p>11 guidance document that is headed TSU roles and</p> <p>12 responsibilities.</p> <p>13 "The key functions of the TSU are to (1) assist the</p> <p>14 force or agency in their strategic objectives of</p> <p>15 reducing crime and disorder.</p> <p>16 "(2) satisfy an operational requirement by using</p> <p>17 covert technical deployments to gather intelligence and</p> <p>18 evidence.</p> <p>19 "(3) guide and advise the senior investigating</p> <p>20 officers in their investigative and operational</p> <p>21 strategies.</p> <p>22 "(4) manage the procurement and use of technical</p> <p>23 equipment maintaining a central record of all equipment</p> <p>24 held.</p> <p>25 "(5) develop good working relationships with</p> <p style="text-align: center;">Page 5</p>	<p>1 partners and be able to manage conflicting demands</p> <p>2 within a confidential environment.</p> <p>3 "In order to undertake these responsibilities the</p> <p>4 TSU should have a management structure and operatives</p> <p>5 that have the necessary skills to undertake the variety</p> <p>6 of tasks required. The primary task of the TSU is</p> <p>7 technical surveillance and it should not be required to</p> <p>8 undertake any other functions, for example the</p> <p>9 examination of mobile phones and media copying which are</p> <p>10 generally the responsibility of other departments within</p> <p>11 the force."</p> <p>12 Does that accord with your understanding of the role</p> <p>13 and responsibility within the TSU?</p> <p>14 MR BROWN: Yes, sir.</p> <p>15 If that helps that is on page 17 of my report in</p> <p>16 tab 2.</p> <p>17 Q. Thank you very much.</p> <p>18 Thank you very much.</p> <p>19 I am just going to also take us to the guidance on</p> <p>20 the training that should be undertaken. This is at</p> <p>21 page 46 of the same document, which I think also appears</p> <p>22 in your report.</p> <p>23 "Technical surveillance training must be delivered</p> <p>24 to national standards by appropriately qualified</p> <p>25 technical surveillance trainers. Failure to comply with</p> <p style="text-align: center;">Page 6</p>
<p>1 these standards may have implications under health and</p> <p>2 safety at work legislation. It could also be suggested</p> <p>3 during civil, criminal or coroner's proceedings that</p> <p>4 chief officers may have a vicarious liability if it were</p> <p>5 proved that operatives had not received appropriate</p> <p>6 training."</p> <p>7 Thank you very much.</p> <p>8 MR BROWN: Yes.</p> <p>9 Q. Mr Storey, I would like to explore with you now the</p> <p>10 authorisations that were obtained during the course of</p> <p>11 Operation Utara. You deal with these at page 5 and into</p> <p>12 page 6 of your report, which lies behind our tab 1 in</p> <p>13 our hard copy bundle.</p> <p>14 The authorisation required in this case was</p> <p>15 a directed surveillance authority for the use of the</p> <p>16 probe, wasn't it?</p> <p>17 MR STOREY: That's correct, sir.</p> <p>18 Q. The use of the tracker in the vehicle did not require</p> <p>19 the directed surveillance authority but may have</p> <p>20 required a property interference authority; is that</p> <p>21 right?</p> <p>22 MR STOREY: That's correct, sir.</p> <p>23 Q. Right.</p> <p>24 Let me take you please to paragraph 23 of your</p> <p>25 report, in which you provide the following opinion:</p> <p style="text-align: center;">Page 7</p>	<p>1 "The covert activity sought and undertaken in</p> <p>2 Operation Utara/Ankaa was compliant with the guidance</p> <p>3 within the Code of Practice for covert surveillance and</p> <p>4 property interference 2014 and RIPA 2000, which were</p> <p>5 current at the time. The deployment of technical</p> <p>6 equipment and the CMP were lawfully authorised."</p> <p>7 Does that reflect your view?</p> <p>8 MR STOREY: Yes, sir.</p> <p>9 Q. Thank you.</p> <p>10 Can we go now to behind tab 4 in our hard copy</p> <p>11 bundle, and to document MPS3658. Could we display that,</p> <p>12 please, Mr Coates.</p> <p>13 Just to confirm that this was the directed</p> <p>14 surveillance authority granted as we see from this</p> <p>15 document, on 4 November 2015 and subsequently cancelled</p> <p>16 at the conclusion of the operation?</p> <p>17 MR STOREY: That's correct, sir.</p> <p>18 Q. Thank you very much, we can take that down now.</p> <p>19 Mr Brown, I would now like to explore with you the</p> <p>20 requests made during Operation Ankaa to the technical</p> <p>21 support unit, or the TSU as we know it to be.</p> <p>22 I don't think that we need to go to the APP guidance</p> <p>23 on this. I am going to take you straight away to tab 5</p> <p>24 of our hard copy documents. We know that intelligence</p> <p>25 was received on 30 October 2015, and there is an Obelisk</p> <p style="text-align: center;">Page 8</p>

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<p>1 record that commenced on 4 November 2015. Is that 2 right? 3 MR BROWN: Yes, that's correct, sir. 4 Q. Right, initially there was a request made to install 5 an audio probe in the prison vehicle and if we go to 6 page 6 of our document that lies behind our hard copy 7 bundle, tab 5, I think we can display this please, 8 Mr Coates, it is MPS3992, page 6. 9 Although there were meetings held to discuss the 10 request to install an audio probe in the prison vehicle, 11 is it right that those requests were, or rather the 12 applications were subsequently withdrawn because it was 13 determined that that was not going to be part of the 14 operation? 15 MR BROWN: That appears so, correct. 16 Q. Thank you. 17 Can we go now, please, behind tab 6 in our hard copy 18 bundle. 19 Mr Coates, this is MPS3993 -- 20 THE CHAIRMAN: Can I just ask a question. 21 If there was an application for an audio probe in 22 a prison vehicle, would the identity of the prison 23 vehicle have to be known? 24 MR BROWN: Not necessarily the identity of the exact prison 25 vehicle. It may be that a particular type of vehicle</p> <p style="text-align: center;">Page 9</p>	<p>1 may well be disclosed so that the preparatory work could 2 take place in respect of the TSU establishing whether -- 3 THE CHAIRMAN: Somebody would have to know which vehicle it 4 was, wouldn't they, and that of course they didn't 5 because they hadn't shared the -- 6 MR BROWN: I think the initial request is a preparatory act 7 on behalf of the investigating officers to see if the 8 TSU could provide the support to them if they required 9 it at the time. 10 THE CHAIRMAN: Right. Sorry to interrupt. 11 MS BLACKWELL: Not at all. 12 Thank you, I am going to turn now to the request to 13 fit the static camera and if we look at MPS3993, which 14 we have on screen. Could we go, please, Mr Coates to 15 page 7, we can see that there was a request made to fit 16 a static camera on 6 November 2015, is that right? 17 MR BROWN: Sorry, page 7? 18 Q. Yes. If you look at the dates, we can see that 19 an application was made for that to be put in force on 20 6 November. Page 7. 21 MR BROWN: Yes. 22 Q. Thank you. 23 Your report doesn't cover that aspect of the TSU, so 24 I am not going to ask you any more details about that 25 but just to establish that that was done through you.</p> <p style="text-align: center;">Page 10</p>
<p>1 Could we go now to tab 10 in our hard copy bundle. 2 We can see that lying behind tab 10 is a document. 3 MPS3997, please, Mr Coates. This is a request for 4 a tracker on the Audi vehicle. Can we go to page 7. 5 We can see here that this task for a tracker to be 6 put onto the Audi vehicle was created on 7 10 November 2015, the plan was agreed and if we go over 8 the page to page 9, please, Mr Coates, we can see at the 9 top of the page there there was a request for a PLAICE 10 risk assessment. 11 Sir, that is the same risk assessment that we saw 12 a few days ago and that Mr Sparks was asked about? 13 THE CHAIRMAN: PLAICE? 14 MS BLACKWELL: P-L-A-I-C-E, you remember the document that 15 officer took us through. 16 THE CHAIRMAN: I remember raising at the time and it is 17 still outstanding, the question of the risk assessment 18 in relation to the installation of the probe. 19 MS BLACKWELL: That's right, yes. 20 THE CHAIRMAN: We will come to that later no doubt. 21 MS BLACKWELL: Thank you. 22 Finally, we can see on page 9 that that tracker was 23 fitted, equipment installed on 18 November. 24 Again, Mr Brown, your report does not cover that 25 aspect of the TSU, so I am not going to ask you any</p> <p style="text-align: center;">Page 11</p>	<p>1 further details about it, except to establish those 2 factual elements. 3 MR BROWN: That's correct. 4 Q. If we could look back at tab 9 please in our hard copy 5 bundle. Mr Coates could we bring up MPS3996. 6 We are returning to the probes now. 7 3996? No. 8 I am just going to read out the relevant parts of 9 this document. This is, again, a TSU document and the 10 objective is set out in summary as follows: 11 "To provide live time and recorded audio product 12 from a vehicle to be used in crime. This is in 13 conjunction with another request submitted on 14 4 November 2015 under a different reference." 15 That confirms, does it not, Mr Brown, that in 16 relation to the audio probe, that was being made in 17 conjunction with the tracker which had already been 18 dealt with in another order. 19 MR BROWN: Yes, that's correct, sir. 20 Q. Thank you very much. 21 I am just going to take you through this document to 22 establish the facts. 23 Could I ask you, please, Mr Brown, to look at page 6 24 and confirm that this was created on 5 November 2015. 25 There is confirmation further down page 6 that the</p> <p style="text-align: center;">Page 12</p>

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<p>1 applicant was spoken to and a joint strategy meeting was 2 called and that was due to take place and in fact did 3 take place on 9 November 2015. 4 MR BROWN: That's correct, sir. 5 Q. Thank you. 6 I would just like to pause in the chronology and ask 7 you whether or not it would have been possible in 2015 8 to fit a camera, so some sort of video probe, into the 9 Audi vehicle? 10 MR BROWN: Technically, it was possible. 11 Q. Yes. 12 MR BROWN: The reality of such would be that the 13 installation of such a device into a vehicle, especially 14 one in this type of operation, would not be appropriate 15 due to the complexity of the setting up of the camera, 16 the potential power that that would take from the 17 vehicle battery -- 18 Q. Could I just ask to pause there and expand on that 19 a little more, please? 20 MR BROWN: Okay. 21 The technology at the time was not as developed as 22 it is now and as such the complexity of installing that 23 type of device into a vehicle would, in my opinion, not 24 be suitable. I think it would detract from the 25 operational requirement of the audio, which was the</p> <p style="text-align: center;">Page 13</p>	<p>1 primary -- 2 Q. That was the primary purpose, wasn't it? 3 MR BROWN: That was the primary purpose. 4 Q. To capture the conversation that was going to take 5 place? 6 MR BROWN: Yes. 7 Q. Have things moved on? 8 MR BROWN: Significantly. 9 Today there are pieces of equipment that would 10 facilitate the deployments of a camera in a vehicle and 11 as such it would be one of the considerations that may 12 be given for this type of operation, subject to time 13 constraints and the capability of the people who were 14 installing the equipment into the vehicle. 15 Q. Thank you very much. 16 I would like to move on now to the contribution of 17 the TSU to the planning of Operation Ankaa. 18 Mr Coates, I am going to invite you to put up COP72, 19 please, which is more APP guidance, at page 49. 20 Never mind, if you could just allow me a moment, 21 please, sir, I am going to again obtain my own copy of 22 this and just read into the record the relevant part. 23 THE CHAIRMAN: Right. (Pause) 24 MS BLACKWELL: Mr Brown, could I ask you to confirm that 25 there was a strategy meeting held on 9 November 2015,</p> <p style="text-align: center;">Page 14</p>
<p>1 I think this appears at page 39 in your main report. 2 MR BROWN: Yes, it is also contained in the Obelisk record. 3 Q. That's right. 4 MR BROWN: That's correct, sir. 5 Q. Between 9 November and 20 November, are there documented 6 records of further meetings in the action log between 7 the covert authorities unit and other officers employed 8 in preparing and planning for Operation Ankaa? 9 MR BROWN: Yes, that's correct. 10 Q. Let's look, please, at MPS3997, please, Mr Coates. 11 THE CHAIRMAN: Behind divider 10? 12 MS BLACKWELL: Divider 9 I think, sir -- no, you are right, 13 yes, divider 10. 14 Let's look, please, between pages 6 and 9, if we 15 could go to page 7, please. Are these the records, 16 Mr Brown, of the meeting first of all that took place on 17 9 November and then, if we scroll through, please, 18 Mr Coates, the subsequent meetings during the month of 19 November? 20 MR BROWN: This record relates to the tracking device at 21 tab 10. 22 Are we referring to tab 9, the audio device or 23 tab 10, the tracking device? 24 Q. Could you take us through your understanding of the 25 level of contact between the TSU and the officers who</p> <p style="text-align: center;">Page 15</p>	<p>1 were planning Operation Ankaa, in relation to each of 2 those. You have had an opportunity to consider the 3 level of contact, the number of meetings that took 4 place, the level of support provided by the TSU, do you 5 consider that there was an adequate level of contact 6 between the two sides of the operation? 7 MR BROWN: I mean what is contained on the Obelisk records 8 is a high-level information to say that a meeting is 9 taking place. 10 Q. Yes. 11 MR BROWN: What is not contained in there is any documentary 12 decision logs or actions that have come from those 13 meetings that may have needed further response from the 14 TSU. It is quite right to say that during the Obelisk 15 records of tab 9 and tab 10 there is sufficient contact 16 between the investigation team and the TSU, and also 17 with the TSU asking questions of the investigation team. 18 Q. Yes. 19 MR BROWN: In that respect, there has been sufficient 20 contact, but the content of that contact is very 21 difficult to determine, because there is no documentary 22 evidence to suggest that. 23 Q. That takes us conveniently to the issue of record 24 keeping. Because you can confirm, can you not, 25 Mr Brown, that there is a need for comprehensive records</p> <p style="text-align: center;">Page 16</p>

<p>1 to be kept?</p> <p>2 MR BROWN: Yes, that's correct.</p> <p>3 Q. Precisely for the reason that you have just identified,</p> <p>4 that although according to these records there appears</p> <p>5 to be an appropriate level of contact, it is not</p> <p>6 possible looking at these records alone to determine the</p> <p>7 nature of what was discussed and whether or not that</p> <p>8 included all relevant areas?</p> <p>9 MR BROWN: That's correct, sir.</p> <p>10 Q. All right.</p> <p>11 Mr Coates, I am going to attempt again to turn to</p> <p>12 you and ask you to display COP79. That's good timing.</p> <p>13 Thank you very much. Page 44, please.</p> <p>14 9.1:</p> <p>15 "Evidence. It is important to keep comprehensive</p> <p>16 and accurate records of all TSU operations and</p> <p>17 deployment activities so that robust and credible</p> <p>18 evidence can be presented if required.</p> <p>19 "Material produced before a criminal investigation</p> <p>20 begins, no matter how old or for what original purpose</p> <p>21 may be relevant under the ... (CPIA) when a criminal</p> <p>22 investigation commences.</p> <p>23 "The need to protect sensitive equipment and</p> <p>24 techniques from exposure is not an excuse for failing to</p> <p>25 record their use. Care needs to be taken with detail</p> <p style="text-align: center;">Page 17</p>	<p>1 but an applications for PII are unlikely to succeed if</p> <p>2 it is not demonstrated that procedures have been</p> <p>3 followed and there is a valid reason to use it.</p> <p>4 "All records must be made at the time or as soon</p> <p>5 after the event as practical and the TSU should engage</p> <p>6 with the disclosure officer at an early stage of their</p> <p>7 involvement in an operation."</p> <p>8 Does that confirm the importance, certainly so far</p> <p>9 as the criminal jurisdiction is concerned, for --</p> <p>10 MR BROWN: Yes, the legislative requirements under the CPIA</p> <p>11 Act require us to record, review and retain all</p> <p>12 information, and if it is not contained in the documents</p> <p>13 that I have had access to and we are looking at today,</p> <p>14 I would suggest that there should be some other record</p> <p>15 either in daybooks or in meeting notes that should be</p> <p>16 available subsequently for any criminal investigation or</p> <p>17 should be available to be produced.</p> <p>18 Q. Yes, or indeed --</p> <p>19 MR BROWN: In an inquiry.</p> <p>20 Q. In an inquiry, yes.</p> <p>21 We have looked at it already, but could you explain</p> <p>22 to the inquiry, please, the purpose of the Obelisk log?</p> <p>23 MR BROWN: The Obelisk log, it is a living document, so it</p> <p>24 allows anybody who has been given access to the system,</p> <p>25 and this particular request -- there is a hierarchy</p> <p style="text-align: center;">Page 18</p>
<p>1 level, so not everybody can see it, permissions have to</p> <p>2 be given to the record to allow them either to see the</p> <p>3 information or to add information on to the record.</p> <p>4 Q. Yes.</p> <p>5 MR BROWN: Each person who is granted access to the Obelisk</p> <p>6 record has the capability of adding information to it.</p> <p>7 The action log, which is the documents referred to at</p> <p>8 tab 9 and tab 10, they are effectively the notebook of</p> <p>9 the operation.</p> <p>10 Q. Right.</p> <p>11 MR BROWN: So that will be a chronological event of things</p> <p>12 that have taken place from the inception of the creation</p> <p>13 of the record for the operational requirement, to the</p> <p>14 closure of the record at the end of the installation or</p> <p>15 the retrieval.</p> <p>16 Q. That should be a full audit trail of what takes place?</p> <p>17 MR BROWN: It is designed to do that. However, I am aware,</p> <p>18 and I appreciate, that not everything goes into the</p> <p>19 Obelisk record. However, it doesn't detract from the</p> <p>20 information that that, if it is held outside of the</p> <p>21 electronic record, then it should be available and</p> <p>22 disclosed or put into a place where it can be disclosed</p> <p>23 at a later stage.</p> <p>24 Q. Thank you very much.</p> <p>25 Could we put up, please, Mr Coates, FEO74, page 2.</p> <p style="text-align: center;">Page 19</p>	<p>1 Here we see, "Summary of Obelisk record contents":</p> <p>2 "Obelisk records contain a chronological log of the</p> <p>3 contact between the investigation team and the Technical</p> <p>4 Surveillance Unit in relation to the specific request by</p> <p>5 the investigation team for the deployment of TSU</p> <p>6 officers for installation of covert monitoring</p> <p>7 equipment."</p> <p>8 As you have explained, this record of communication</p> <p>9 is detailed in the action log section heading of the</p> <p>10 record:</p> <p>11 "Within are summaries of conversations held between</p> <p>12 the investigation team and the TSU relating to the</p> <p>13 loggists, technical challenges, covert police tactics to</p> <p>14 be deployed, equipment to be used and strategy for the</p> <p>15 installation of the covert monitoring equipment.</p> <p>16 Detailed within the log are the dates of the strategy</p> <p>17 meetings held between the investigation team and the</p> <p>18 TSU, the personnel involved, summary notes of the</p> <p>19 meeting and outcomes, within the log are references to</p> <p>20 or summaries of the intelligence case."</p> <p>21 Does that confirm what you have just told us?</p> <p>22 MR BROWN: That's correct, sir.</p> <p>23 Q. Thank you very much, Mr Brown.</p> <p>24 We can take that down, please.</p> <p>25 With all of that guidance and important information</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 that you have provided to the inquiry in mind, what is 2 your opinion of the quality of the records kept by the 3 TSU in this case? 4 MR BROWN: There is certainly some information lacking in 5 the documents that have been provided. I would have 6 expected to see more information, certainly contained 7 and the outcomes of meetings and any actions that arise 8 from those meetings, who dealt with them, what the 9 rationale behind the decision was and what the outcomes 10 were. 11 On the basis of what I can see, and what I have 12 seen, the document does provide information. It is not 13 a blank document, it has information there. 14 Q. Yes. 15 MR BROWN: It is just not detailed enough for my purposes 16 and certainly from experience, the more detail you have, 17 the less confusion you have. 18 Q. Right. Taking you to a specific issue, does the 19 document make reference to the authorities and does it 20 note that they have been read and understood? 21 MR BROWN: The tab 9 reference to the authority is contained 22 at -- sorry, at page 2. 23 Q. At page 2 behind tab 9? 24 MR BROWN: Tab 9, page 2. 25 Q. Right.</p> <p style="text-align: center;">Page 21</p>	<p>1 MR BROWN: It does make reference to the property 2 interference authority. 3 Q. Yes, could I just ask you to pause there. 4 Mr Coates, let's display this, it is MPS3996 at 5 page 2, please. 6 Is that the page? 7 MR BROWN: Yes, it is. 8 Q. Do we see towards the bottom on the left-hand side 9 "Type", part three Police Act interference and then the 10 authority number going across the page, starting on 11 1 December 2015? 12 MR BROWN: That's correct. 13 Q. Right, so there is a reference to the relevant 14 authority? 15 MR BROWN: Yes. 16 Q. Does that fill you with confidence that that authority 17 had been read and understood by the officers involved? 18 MR BROWN: No, there needs to be documentary logs contained 19 either in the Obelisk record or in supplementary 20 documentation that relevant people who are responsible 21 for parts of that operation have actually seen the 22 authority, when they saw it, what time they saw it and 23 they signed to say that they have seen it. 24 Q. That is absent from here? 25 MR BROWN: That is, yes.</p> <p style="text-align: center;">Page 22</p>
<p>1 THE CHAIRMAN: Can I just enquire, you said that not 2 everything goes in, but what hasn't gone in should 3 nevertheless be available. You then went on to comment 4 that, whilst this Obelisk log was not complete, it was 5 nevertheless not blank. 6 MR BROWN: Yes. 7 THE CHAIRMAN: To what extent was what I can perhaps 8 describe as the second-class system of records 9 maintained in this case? As an alternative, if you 10 will, to the desired approach. 11 MR BROWN: Yes, I think -- 12 THE CHAIRMAN: In other words: was there anything elsewhere 13 which was not in the log itself? 14 MR BROWN: There may be references within the log itself 15 that refers to other parts of the operation that may be 16 contained in other documentation, but if that is the 17 case, it should show where that documentation is, and 18 how that should be able to be retrieved. Certainly as 19 far as the meetings are concerned, I would expect there 20 would be a precis of the meeting and, as I say, any 21 actions that have resulted from that meeting to be 22 documented. 23 THE CHAIRMAN: What you are saying is, even the second-class 24 approach was not satisfactorily maintained in this case, 25 in your opinion?</p> <p style="text-align: center;">Page 23</p>	<p>1 MR BROWN: I think if the team who had access to the record, 2 when they read the action log, could continue either 3 with the operation or do the necessary actions that are 4 required of them, then you could say that the 5 information contained in the record would be sufficient 6 for their purpose. 7 It is when there is something in the record that is 8 not there, is where did those people go and look for it 9 and there is nothing to suggest. 10 THE CHAIRMAN: That has not happened in this case. 11 MR BROWN: That has not happened in this case. 12 THE CHAIRMAN: Thank you. 13 MS BLACKWELL: Thank you, Mr Brown. 14 We can take that down now, Mr Coates. 15 I am going turn away from record keeping and ask you 16 some questions now about the equipment chosen for the 17 audio probes in the Audi. 18 We are going to look in more detail at each device 19 in closed session, but for the present moment, could you 20 explain to the inquiry, please, in your view, what are 21 the factors to be considered when selecting such 22 devices? 23 MR BROWN: There are certain areas which we will discuss in 24 closed session -- 25 Q. Yes.</p> <p style="text-align: center;">Page 24</p>

1 MR BROWN: -- surrounding the capability of the equipment.
 2 Q. Yes.
 3 MR BROWN: The choice of whether you install one or multiple
 4 devices is one for consideration.
 5 Q. Yes.
 6 MR BROWN: And the technical capability of the equipment
 7 available for you at the time and whether or not you
 8 have that available to deploy into the vehicle or
 9 whatever you are deploying into.
 10 So it is one of capability and one of expectations
 11 and managing the expectations of the employer to make
 12 sure that you fulfil the operational requirement.
 13 Q. In the knowledge of the devices that were chosen, and
 14 those that were available at the time, is it your
 15 opinion that the actual devices selected to be fitted
 16 into the vehicle were appropriate?
 17 MR BROWN: Yes.
 18 Q. Thank you.
 19 You have touched upon the decision to use one or
 20 more than one device.
 21 What is the reason for choosing to use two devices?
 22 MR BROWN: It is subject to the operational requirement as
 23 to what is being asked. However, if there is
 24 a requirement to live listen to a product, that product
 25 will generally be using some sort of a transmission

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1 "In response to the request, the TSU supported this
 2 operation by providing the technical facilities required
 3 for the operational team to covertly monitor and record
 4 audio product from within the vehicle. My role was that
 5 of operational lead in the TSU support of that request.
 6 The covert monitoring and recording of audio product
 7 from within a motor vehicle is a covert police tactic
 8 which is not routinely employed. The depth of the
 9 desire to preserve the covert nature of the tactic is
 10 reflected in the fact that the TSU will generally only
 11 support such requests in cases of the most serious
 12 crime."
 13 Does that accord with your understanding, Mr Brown?
 14 MR BROWN: It has to be serious crime in respect of the
 15 property interference and the intrusive authority, if
 16 one was granted.
 17 Q. Yes.
 18 MR BROWN: So it has to be serious crime, but, yes, that is
 19 a fair opinion.
 20 Q. Thank you.
 21 Could we scroll down, please, Mr Coates, to the
 22 bottom portion of the page.
 23 Here we can see, about five lines down:
 24 "Two distinct systems were deployed. The first
 25 system was designed to record audio activity and store

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1 medium, and depending upon the type of transmission
 2 medium selected, that may have some shortcomings. That
 3 therefore to choose a device that is not recording that
 4 medium but record locally will provide many benefits,
 5 one of which is the better audio quality.
 6 So it is a catch-all thing, if the transmission
 7 medium fails, you have a facility of having a better
 8 quality audio product that can be used to fill in the
 9 gaps, I, or alternatively with any ambiguity in the live
 10 feed being listened to and there was some issues in
 11 intelligibility, then the device that is recording
 12 locally should have a better quality audio to allow the
 13 review of that piece of audio to clarify matters in
 14 respect of what was said.
 15 Q. Yes, thank you.
 16 As part of the package of material that you have
 17 been provided with in inviting you to prepare your
 18 report, did you consider the witness statement of
 19 Steve Alexander, who was the detective sergeant in the
 20 Met TSU?
 21 MR BROWN: Yes, I did, sir.
 22 Q. I am going to ask that we look at that now, please,
 23 Mr Coates, it's at MPS124, and can we go to page 2.
 24 I will just read into the record what he says, it is
 25 eight lines into this large paragraph. Thank you:

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1 it in a device within the vehicle."
 2 That is the store and retrieve system:
 3 "This did not provide live audio product but was
 4 intended to be downloaded when the vehicle was recovered
 5 by police. This system offered the advantages of the
 6 quality of the product being superior to that obtained
 7 through live monitoring, in that it recorded the full
 8 frequency range and could therefore be suitable for
 9 forensic examination, and also being available as
 10 a backup should the live monitoring system fail."
 11 That is what you have just set out to us, Mr Brown,
 12 isn't it?
 13 MR BROWN: That's correct.
 14 Q. "This system was powered off the vehicle battery and so
 15 draining the battery while the vehicle was not being
 16 used was a potential issue. As a result, it was
 17 necessary to take all practical steps to conserve
 18 battery life and the system was therefore controlled by
 19 an audio switch. This meant that the system was dormant
 20 until it detected sound. At that point it activated and
 21 remained activated until it no longer detected sound and
 22 resumed its dormant state. It was designed to activate
 23 and deactivate repeatedly as it detected sound. The
 24 level of the sound required for activation was set prior
 25 to deployment. There was no exact gauge in setting this

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1 level, only practical experience, but the intention was
 2 to ensure that it would be activated by any of the doors
 3 being opened on that vehicle, but would not be activated
 4 by ambient sounds such as rain or voices away from the
 5 vehicle."
 6 Does that explain the manner in which the store and
 7 retrieve system was to be activated during the course of
 8 this operation?
 9 MR BROWN: Yes, that is how Mr Alexander explained it in his
 10 statement.
 11 Q. Right. We will come to see how effective it was in
 12 reality.
 13 But that was the intention and that was one of the
 14 purposes of using the store and retrieve system, because
 15 of its superior quality?
 16 MR BROWN: That's correct, sir.
 17 Q. Reading on:
 18 "The second system was designed to permit the
 19 operational team to listen live to audio from within the
 20 vehicle, the live system, while also recording it on
 21 a device within the Covert Monitoring Post. This system
 22 was also powered off the vehicle battery but could be
 23 remotely commanded on and off and did not rely on
 24 detecting audio in order to activate itself. The means
 25 by which this product was transmitted away from the

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1 two different devices?
 2 MR BROWN: Most definitely, yes.
 3 Q. Right.
 4 Let's turn, please, to the installation of the
 5 equipment in the Audi.
 6 Could you tell us, please, Mr Brown, your opinion on
 7 whether or not the equipment should have been installed
 8 by suitably trained operatives?
 9 MR BROWN: Yes, that is contained within documents.
 10 Q. It seems like an obvious question, doesn't it, but can
 11 you then go on to comment on whether or not the
 12 operatives in this case were suitably trained?
 13 MR BROWN: Unfortunately I have no documentary evidence to
 14 suggest that the required competencies or training
 15 courses had been completed by the operatives. Indeed,
 16 I am still struggling to find out who actually installed
 17 the device into the vehicle.
 18 Q. Why is that?
 19 MR BROWN: Just that there seemed to be conflicting
 20 information. I think there is one paragraph in
 21 a briefing document that mentions somebody has been the
 22 person installing the device, but they are not contained
 23 on the Obelisk record. Steve Alexander says that he was
 24 responsible for the installation of the device into the
 25 vehicle in his statement. And in the Obelisk record

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1 vehicle meant that the frequency band was restricted and
 2 the audio quality was therefore not as good as the store
 3 and retrieve system. The benefit was that the audio was
 4 monitored live. One of the features of the software
 5 associated to this system was a function that permitted
 6 the person monitoring the product to review the content
 7 by scrolling back through the recording to 15- or
 8 30-second increments."
 9 Again, that explains the live feed and what
 10 Mr Alexander expected would be available to those
 11 monitoring the live feed on the morning.
 12 MR BROWN: Yes, there are some inaccuracies in what he says
 13 there in respect of the live device -- sorry, in respect
 14 of the live device and the way that it draws the power
 15 from the vehicle. But in principle, ignoring that fact,
 16 the rest of it is what I would expect, yes, sir.
 17 Q. Thank you.
 18 As I have I hope made clear, although this was the
 19 hope and expectation. In relation to both parts of the
 20 device, as we will see, the reality was somewhat
 21 different?
 22 MR BROWN: Yes.
 23 Q. Thank you.
 24 Can we take that down, please, Mr Coates.
 25 In your opinion, Mr Brown, was it a good idea to use

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1 there are two references in there, one from
 2 Steve Alexander and one from another member of the TSU
 3 staff who say that the device was deployed.
 4 There is nothing contained in the documentation that
 5 I have seen that confirms exactly who was responsible
 6 for what and how they did it.
 7 THE CHAIRMAN: This is an accountability issue, apart from
 8 skill?
 9 MR BROWN: Yes, an accountability issue but it will be again
 10 nice to know that the people who were responsible for
 11 the installation had the appropriate skills and
 12 expertise to do so.
 13 THE CHAIRMAN: Indeed. Thank you.
 14 MS BLACKWELL: The problem is twofold.
 15 Firstly, that you were not able to identify who had
 16 carried out that task.
 17 Secondly, because you were not provided with the
 18 identity, you were then not able to test whether those
 19 operatives had the suitable level of training and
 20 experience?
 21 MR BROWN: That's correct, sir.
 22 Q. Thank you.
 23 The testing of the audio probes that were installed
 24 into the Audi.
 25 This is also something that you were able to assist

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1 us with in your report, isn't it?
 2 Could I ask you, please, to look at page 51 of your
 3 report, which lies behind tab 2.
 4 MR BROWN: Yes.
 5 Q. Mr Coates, could we display this, please, at INQ39 and
 6 go to page 51. Thank you.
 7 Could you take us through this flowchart which you
 8 have kindly provided us with, Mr Brown?
 9 MR BROWN: Yes. Well the first thing is to select the test
 10 environment.
 11 Q. Yes.
 12 MR BROWN: Secondly, then you select an appropriate audio
 13 test source. At tab 3, you would then perform
 14 recordings under representative conditions, you would
 15 then analyse those recordings and then you would
 16 optimize the installation.
 17 That continues in a cyclic manner until you are
 18 satisfied that the audio product you have obtained is
 19 suitable and fits the operational requirements and then,
 20 after that has taken place, you then present your
 21 results and that could be in either documentary form, it
 22 could be in allowing the employer to listen to it and
 23 they then satisfy themselves that that fits with the
 24 operational requirement that they have set.
 25 Q. Right. So if you are lucky you may only have to perform

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1 I am going to ask you, Mr Brown, to look again
 2 behind tab 9, please, to our operational log.
 3 Do the notes of the fitting that are made in this
 4 log assist you with the testing that occurred and
 5 whether or not that was appropriate and reasonable in
 6 the circumstances?
 7 MR BROWN: I think there is just one reference to the
 8 installation prior to the deployment on the 8th --
 9 Q. Yes.
 10 MR BROWN: -- and that just says that TSU activity has been
 11 completed, but it doesn't go into any detail whatsoever
 12 in relation to any testing processes that have taken
 13 place.
 14 Q. Has that hampered you in your ability to provide
 15 an opinion on it?
 16 MR BROWN: Most definitely.
 17 Q. Right.
 18 Let's look for a moment, please, if we may, at the
 19 testing that was carried out immediately before the
 20 deployment. I think you were also provided with the
 21 witness statement of the officer known as EG39?
 22 MR BROWN: Yes.
 23 Q. This lies behind tab 18 in our hard copy bundle, and we
 24 can also display this, please, Mr Coates, it is at
 25 MPS3817.

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1 each one of those six steps once, but it may be
 2 necessary for you to repeat all of the steps until you
 3 are satisfied of the result?
 4 MR BROWN: The issue is that not all vehicles are the same.
 5 So you may have a vehicle that is quite noisy, due to
 6 the lack of sound insulation in the vehicle. It may
 7 well be that it is a commercial vehicle that is
 8 obviously quite reverberant or it could be a high end
 9 vehicle where there is quite a lot of sound insulation
 10 and suitable glazing that makes the actual acoustic
 11 properties of that vehicle different on each occasion.
 12 So every one is treated separately, one size does not
 13 fit all, and you just cannot expect to use the same
 14 equipment in every case in every vehicle.
 15 Q. It has to be a bespoke choice of equipment, which would
 16 necessarily lead to a bespoke series of tests?
 17 MR BROWN: Yes, there should be a systematic approach to the
 18 installation of the device into the vehicle and one
 19 would expect that you would take each level of what we
 20 would call the audio chain and go through each one of
 21 those individually and try to make each part of that
 22 chain as best as possible, and ultimately when you get
 23 to the end of the chain, you will end up with a product
 24 that is suitable to fit the operational requirement.
 25 Q. Right, thank you.

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1 Actually, can we take that down for a moment,
 2 please, Mr Coates.
 3 I am going to read out the relevant parts of what
 4 this officer says about his involvement in the testing
 5 of the equipment.
 6 I am just going to pause a moment, sir.
 7 Do you have this, it is the final paragraph on
 8 page 1.
 9 MR BROWN: Final paragraph, yes.
 10 Q. Yes:
 11 "The previous day ..."
 12 So that would be the 7th --
 13 THE CHAIRMAN: No, the 10th.
 14 MS BLACKWELL: I am so sorry, the 10th.
 15 THE CHAIRMAN: That is all right.
 16 MS BLACKWELL: Yes:
 17 "The previous day I conducted a test of the
 18 equipment, the results of which were satisfactory. The
 19 audio recording equipment records sound from a receiver
 20 placed in a relevant location. To test the recording
 21 equipment without any risk of compromise, the receiving
 22 device ..."
 23 I am going to move on to just deal with the next
 24 line:
 25 "I then listened to the recording device as sound

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1 was transmitted and the equipment including the facility
 2 to review already recorded product was working at that
 3 time."
 4 I am not going to deal with the detail of the
 5 testing that was carried out, because I think we are
 6 going to deal with that in closed session.
 7 But is it right for you to confirm during this
 8 session that this officer was able to connect from the
 9 Covert Monitoring Post to a different device and not the
 10 actual device that was located in the Audi vehicle, in
 11 order to test it?
 12 MR BROWN: Yes, that is what he says.
 13 Q. Do you think that was suitable?
 14 MR BROWN: I think that whilst that is proving certain parts
 15 of the chain, it is not proving all the parts of the
 16 chain.
 17 Q. Yes.
 18 MR BROWN: Therefore if the testing is to test the chain
 19 from one end to the other, then that has not been
 20 completed.
 21 Q. No, because there is no actual connection?
 22 MR BROWN: That's correct.
 23 Q. So that part of the testing system is just not
 24 happening?
 25 MR BROWN: Yes, it is testing a different system,

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1 was of the testing facility?
 2 MR BROWN: Yes:
 3 "Test audio was listened to and approved by FE12 and
 4 DC Paul Hawthorn. It is not known if the two officers
 5 were aware of the way in which the audio was recorded
 6 and transmitted. It is also not clear which audio
 7 product they were approving. Was this the live device
 8 or the store and retrieve device? In MPS000036,
 9 statement of DC Hawthorn, there is no reference to this
 10 approval."
 11 Do you want me to continue?
 12 Q. Yes, please.
 13 MR BROWN: Sorry.
 14 "In MPS0003477, page 21, EG39 states that they
 15 attended on 10 December and conducted tests of the
 16 equipment. This is not documented in MPS0003996 and in
 17 respect of the Covert Monitoring Post ..."
 18 Q. We are going to turn to that when we return after our
 19 break, but based upon the witness statements and the
 20 audio log documentation that you were provided with,
 21 were you left with any confidence that the officers who
 22 indicated that they had had an opportunity to understand
 23 the way in which the probe system was working, or
 24 systems were working in the Audi, in fact understood the
 25 difference between the two devices and the quality of

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1 effectively.
 2 Q. Yes. Yes.
 3 Can we go to tab 21, please, in our hard copy
 4 bundle.
 5 Mr Coates, could you display, please, COP75, at
 6 page 7. I want to look at paragraph 5.6.6.
 7 This is a slightly different point, Mr Brown, but it
 8 is really on the same topic.
 9 It says:
 10 "Give the SIO and/or the case officer the
 11 opportunity to listen to the quality and audibility of
 12 the audio product [redacted section]. If the results
 13 indicate that the operational objectives will not be
 14 met, then consider exploring other means to obtain
 15 intelligence from the vehicle."
 16 I am just going to ask you, before we have a short
 17 break, to take us to page 43 of your report, please.
 18 In fact, does your copy of the report have paragraph
 19 numbers in it?
 20 MR BROWN: Yes, it does, yes.
 21 Q. In fact if you look, please, at the bottom of the
 22 previous page, we can see your opinion on the audio
 23 testing that was undertaken, starting at paragraph 191.
 24 Can you just take us through, please, with the
 25 information that you were privy to, what your opinion

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1 product that they would provide?
 2 MR BROWN: Whilst I appreciate that the testing of the probe
 3 within the subject vehicle, the mission vehicle, could
 4 not have taken place until the installation had taken
 5 place on the 8th, the opportunity to test all links in
 6 the system from one end to the other, were available to
 7 the TSU from 24 November until 4 December.
 8 It is my opinion that that should have taken place
 9 to ensure that all parts of the system were working
 10 correctly and then an additional test once the probe had
 11 been installed inside the vehicle, to then confirm that
 12 there was nothing unusual about the vehicle that has
 13 caused it to fail.
 14 Q. Is there anything that you have seen in either the
 15 contemporaneous documentation or the witness statements
 16 to explain why nothing was done over the course of
 17 several weeks?
 18 MR BROWN: No.
 19 Q. All right. Thank you.
 20 Sir, it is a little earlier than normal, but is that
 21 a convenient time for us to take our morning break?
 22 THE CHAIRMAN: Yes, 11.25?
 23 MS BLACKWELL: Yes, thank you.
 24 THE CHAIRMAN: Thank you very much.
 25 (11.14 am)

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1 (A short adjournment)
 2 (11.29 am)
 3 THE CHAIRMAN: Thank you very much.
 4 MS BLACKWELL: Thank you, sir.
 5 We are going to move on from the testing of the
 6 audio probes to the quality of the transmissions on the
 7 probe, if we may.
 8 Mr Brown, firstly, have you had the opportunity to
 9 listen to the recordings from both the live feed and the
 10 store and retrieve?
 11 MR BROWN: Yes, sir.
 12 Q. I am going to ask you your opinion of the quality of
 13 feeds please, firstly the store and retrieve?
 14 MR BROWN: The store and retrieve had clarity, it captured
 15 all of the frequency range that would expect it to
 16 capture, the intelligibility was good. Obviously at the
 17 time of the interception/intervention there is
 18 significant increase in amplitude or loudness which
 19 caused the device to clip, but for the intended purpose
 20 of capturing conversations inside the vehicle, it was as
 21 good as it could have been.
 22 Q. Thank you.
 23 What of the live feed and the quality of that?
 24 MR BROWN: The live feed is limited by the transmission
 25 medium that it is using to deliver the feed to the CMP.

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1 MR BROWN: It may be beneficial if I read out the paragraph.
 2 Q. Page 60?
 3 MR BROWN: Yes, I have it here:
 4 "I feel it necessary to explain to the inquiry the
 5 potential perception of what the audio should sound like
 6 compared to the actual recordings that have been
 7 produced. A lot of this perception will be based around
 8 television programmes or films, whereby a range of
 9 sounds, including speech and firearms discharges, are
 10 recorded for the purposes of entertainment.
 11 Nonetheless, what is represented in these mediums is the
 12 distortion of reality."
 13 Q. Right.
 14 MR BROWN: Effectively, within television shows and films,
 15 they will use special microphones that are designed to
 16 capture very, very loud sounds, they will use recorders
 17 that have been set to capture those sounds without them
 18 going into what is called the clipping stage.
 19 Q. Right.
 20 MR BROWN: Then they will usually be recorded in very
 21 controlled environments and the reality of deploying
 22 a device into a vehicle in a surveillance operation is
 23 completely different to what people either see on TV or
 24 hear.
 25 Q. Right, yes.

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1 Q. Yes.
 2 MR BROWN: So naturally there will be a deterioration in the
 3 quality. There appeared to be some interference on the
 4 recording, that could have been from the microphone
 5 cable being in close proximity to an electrical cable
 6 inside the vehicle or alternatively from a mobile phone
 7 that was being used inside the vehicle that has caused
 8 interference into the system.
 9 Q. Right.
 10 MR BROWN: It doesn't detract immensely from the speech that
 11 is contained on there.
 12 Q. Yes.
 13 MR BROWN: And, again, at the time of the
 14 intervention/interception you would expect the quality
 15 of that would be significantly worse than the store and
 16 retrieve device.
 17 Q. Right.
 18 I think within the part of the report where you deal
 19 with the quality, you make a reference to the
 20 expectation that people have of the quality and that
 21 that is an overexpectation.
 22 MR BROWN: Could you just refer to where that is what I made
 23 a reference to, because I don't want to --
 24 Q. I think there is a reference to a comparison with TV
 25 shows, I think is the reference that I am referring to.

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1 So there needs to be a rather large dollop of
 2 realism in terms of what you are going to expect by way
 3 of result?
 4 MR BROWN: Yes.
 5 Q. Mr Storey, do you have an opinion on the quality of the
 6 two feeds?
 7 MR STOREY: Yes, I would quite closely follow what Mr Brown
 8 has actually said just now. I think the store and
 9 retrieve was as expected, good quality, a lot of clarity
 10 in it, very audible for somebody that has to listen to
 11 it subsequently.
 12 Q. Yes.
 13 MR STOREY: But equally the live feed was of good quality,
 14 compared to some I have listened to in other operations.
 15 Q. Thank you.
 16 The review function.
 17 Mr Brown, can you explain to us, please, what the
 18 purpose of the review function is?
 19 MR BROWN: Within the CMP?
 20 Q. Yes.
 21 MR BROWN: Well the review function is there as a mechanism
 22 to be able to clarify something that may have just been
 23 said for the purposes of intelligibility, it may well be
 24 that someone has heard something that they are not sure
 25 of the word, so the ability to be able to go back and

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1 listen again to provide that clarity and make sure that
 2 the accurate records are being maintained in the CMP.
 3 Q. Right.
 4 How is it used if it is set up?
 5 MR BROWN: Well, there are two distinct parts of the
 6 recorder. One part of the recorder would be there for
 7 people to listen to the live feed, and that would be
 8 a truly live listen, with no delay. Then there would be
 9 a separate part of the equipment that is completely in
 10 isolation of the live feed that allows for that review
 11 function to take place.
 12 Q. Right.
 13 If it is set up in the way that you have described,
 14 is it possible to have one operative listening to the
 15 live feed whilst another operative uses the review
 16 function as required to go back and to, if necessary,
 17 repeatedly review a certain passage?
 18 MR BROWN: Yes, there are two independent separate entities
 19 within the recorder.
 20 Q. Thank you.
 21 Mr Storey, is there anything you would like to add
 22 from a CMP perspective about that?
 23 MR STOREY: No. If you know the capability of the recorder
 24 and understand technically how to operate it, then it
 25 should be possible to carry out both functions

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1 regularly there is a potential that ... certainly the
 2 hard drives that were in the machine at that time would
 3 have been traditional hard drives with bearings and
 4 platters and heads that read the platters. Those in
 5 themselves are mechanical pieces of equipment and if the
 6 machine is not used regularly or is not tested regularly
 7 or it is not spun up so that the drives are being used
 8 there is a possibility that the drive heads, the
 9 bearings in the drives, could seize and stop a certain
 10 part of the mechanism working. That could either be the
 11 read side of the drive or the write side of the drive,
 12 in other words information being written to the drive,
 13 the RDO, for example, is on the write head, and the
 14 information that is being recovered or listened to after
 15 the event is from the read head.
 16 So there is a potential that that could have seized
 17 on the day, intermittently these things happen and then
 18 they sometimes clear themselves, that's one possibility.
 19 The second possibility is that I am led to believe,
 20 from further documentation that I have seen, that there
 21 was a little touchscreen that was used for accessing the
 22 review function.
 23 Q. With a finger slide?
 24 MR BROWN: Yes, the actual screen itself is about 7 inches
 25 in size, you can imagine the technology in 2015 wasn't

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1 simultaneously, sir.
 2 Q. Thank you.
 3 As you know, there was a problem experienced over
 4 the course of the morning, and I think it is fair to say
 5 that the evidence the inquiry has so far heard indicates
 6 that it was fairly soon after the operatives began to
 7 work in the CMP that they became aware that the review
 8 function wasn't working properly.
 9 The inquiry has also heard evidence from EG39 as to
 10 his decision, upon hearing about the difficulty and
 11 going into the CMP, not to seek to rectify the problem.
 12 Are you both aware of the evidence to which I refer?
 13 MR BROWN: Yes, sir.
 14 MR STOREY: Yes, sir.
 15 Q. Mr Brown, knowing the equipment as you do, are you able
 16 to offer an explanation for the failure of the review
 17 function that morning?
 18 MR BROWN: Without examining the device that was used on the
 19 day and making any further disseminations there are
 20 a few possibilities that may have occurred.
 21 The device itself is a computer and has an external
 22 sound interface that allows for connectivity and then it
 23 has a separate output function that allows then that
 24 connectivity to be extended to either a headphones or
 25 speakers. With any computer system, if it is not used

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1 as good as it is today, so it would be what is called
 2 a capacitive touchscreen, which requires pressure to be
 3 able to use the touch functionality. They were not the
 4 best screens in the world and sometimes they went
 5 faulty, where the actual screens stopped working.
 6 The other potential possibility could be user error,
 7 where the user is continually requesting the request to
 8 review, and the machine gets confused and then locks up.
 9 Q. All right, so you have given us three possibilities.
 10 Without being able to examine the equipment yourself at
 11 the time that the review function failed to work
 12 properly, it is impossible for you to now say which of
 13 those three could have been behind the problem?
 14 MR BROWN: Certainly if it was the hard drive that was
 15 faulty, that would be very difficult to rectify.
 16 If the screen was faulty, there would be an easy way
 17 of dealing with that by just unplugging the screen and
 18 plugging in a normal keyboard monitor and mouse and that
 19 would have recovered the functionality of being able to
 20 review.
 21 But again, not knowing what happened to the machine
 22 on the day is very difficult for me to determine what
 23 course of action should have been taken.
 24 Q. Is it possible for you to comment in any further regard
 25 on the decision made by EG39 not to seek to rectify the

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1 problem?

2 MR BROWN: From what I understand, the machine was looked

3 at, and the decision was made fairly quickly in relation

4 to the -- there was no other thing that EG39 was going

5 to perform to the machine. That was a decision that was

6 made fairly quickly after the fault had developed.

7 Whether they could have replaced the screen with

8 a normal keyboard, monitor and mouse, I don't know if

9 one was available.

10 Q. No.

11 MR BROWN: That would have been an easy way of just checking

12 one of those potential faults.

13 Q. Right.

14 MR BROWN: Of course the user error of continually

15 requesting the information and it locking the machine

16 up. Again, that probably wouldn't be rectified

17 immediately because the machine is just in a state of

18 confusion.

19 Whether EG39 could have done more. Possibly, but

20 I understand the pressures that they were under in the

21 CMP at the time.

22 THE CHAIRMAN: Would any remedial action have resulted in

23 a suspension of the ability to listen to the probe for

24 the length of time that it would have taken to introduce

25 it, because that is a factor that has to be taken into

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1 working.

2 THE CHAIRMAN: Right.

3 MS BLACKWELL: We sought an additional statement from EG39

4 about the manner in which the equipment was set up and

5 I think you have had an opportunity of looking at that,

6 gentlemen.

7 MR BROWN: Yes.

8 Q. It sits behind tab 26 in our hard copy bundle.

9 I would like to ask both of you, please, to reflect

10 upon what EG39 has said to the inquiry in this statement

11 about the manner in which the equipment was set up.

12 Because this is relevant, is it not, to the ability for

13 the operatives to listen to the live feed, whilst at the

14 same time have the ability to review, to review

15 repeatedly if required, certain aspects of what they had

16 been listening to?

17 MR BROWN: Yes, sir.

18 Q. All right. I don't know which of you feels able to

19 assist us most in this regard, but given what EG39 has

20 said about the lack of clarity in terms of how the

21 equipment was set up, does that cause you any concern?

22 MR BROWN: The only concern I would have is that, having

23 a fault instigated into the recorder, it would have been

24 a responsibility of the person looking at that fault to

25 establish the chain of events that go into the recorder

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1 account, is half a loaf better than no loaf?

2 MR BROWN: The facility of the listening function, that

3 would have not had any effect whatsoever in replacing

4 the screen, because the operators who are listening to

5 the product have no requirement to use a screen, and it

6 is literally an interface that is unplugged and plugged

7 back in again.

8 So for the purposes of listening, then replacing the

9 screen would not have had any impact on their ability to

10 listen.

11 THE CHAIRMAN: So that might have been tried first?

12 MR BROWN: Potentially that would be an option that, if

13 I was in that situation, and those were available to me

14 to replace, then I would have tried that as a first

15 course of action.

16 THE CHAIRMAN: Because it does not impact upon the ability

17 to listen.

18 MR BROWN: That's correct, sir.

19 THE CHAIRMAN: What about the other two options, do they

20 both or not?

21 MR BROWN: I think we are going to come on to the how the

22 machine was wired up, and what impact the wiring of the

23 machine may or may not have had on the ability to

24 continue to live listen at the same time of dealing with

25 remedial action in respect of the review function not

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1 and out of the recorder, because it may well be that

2 some of those things have also failed.

3 Having clarity on how the thing is connected,

4 certainly from a fault-finding position, is something

5 that I would certainly consider that I would have wanted

6 to know.

7 Q. Yes.

8 MR BROWN: So in a fault-finding situation, you want to take

9 a very pragmatic, systematic approach to deal with the

10 fault and working from where the feed comes in, how it

11 is connected internally in the recorder and how it is

12 going out of the recorder, is something that I would

13 want to know from a technician's point of view, so that

14 I can understand where that fault may occur or where it

15 lies.

16 Q. Yes, and in terms of enabling the operatives to have the

17 ability to listen to the live feed and use the review at

18 the same time, from what you know of the equipment that

19 was chosen, is there any reason why that should not have

20 been set up in a way to allow those two things to happen

21 simultaneously?

22 MR BROWN: It goes back to the operational requirement,

23 which is contained on page 1 of the Obelisk record. The

24 operational requirement was to live listen to

25 conversations inside the vehicle and that takes its

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<p>1 prima facie overarching decision on how anything is 2 implemented into the solution, is you have got to comply 3 with the operational requirement. 4 Now, we have not had the benefit of seeing how the 5 recorder was connected and wired up -- 6 Q. Yes. 7 MR BROWN: -- we do know that there was or what appears to 8 have been some sort of a distribution amplifier, because 9 multiple people were connecting to listen at the same 10 time and on the device itself, just from a headphone 11 point of view, there is only one headphone output from 12 that, so there must have been some additional equipment 13 also present in the CMP that would have allowed that to 14 have been taken place. 15 How they were connected to the recorder is a matter 16 for concern, because knowing the recorder and 17 understanding its benefits and limitations, I would 18 suggest to the inquiry that the recorder was set up 19 incorrectly. 20 Q. Right. 21 Going back to the additional statement of EG39, he 22 is unable to provide the inquiry with any assistance now 23 as to how the recorder was set up, is he? 24 MR BROWN: No. 25 Q. All right.</p> <p style="text-align: center;">Page 53</p>	<p>1 So dealing with the key pieces of equipment that 2 were present in the CMP, you have made reference to the 3 recorder, the output speakers and headphones and also 4 something referred to as an audio burner. Other than 5 those three pieces of kit, was there anything else that 6 should have been there, that wasn't there, or did those 7 three pieces of equipment together provide the ability 8 to facilitate what was required? 9 MR BROWN: Yes, so the recorder itself, that is a standalone 10 piece of equipment that has multiple items in it. 11 Q. Yes. 12 MR BROWN: The distribution of the audio from that device 13 will consist of a headphone amplifier, and they come in 14 various guises, again we don't know what headphone 15 amplifier was used, but you could have multiple 16 connections to one of those and of course the headphones 17 connect into the headphone amplifier to enable the 18 person to listen. 19 Attached to that there is a certain amount of wiring 20 that needs to be taking place to connect all those 21 things together. 22 Q. Right. 23 In order to configure the equipment in a way in 24 which both functions were simultaneously available, have 25 you referred to what would have been required as a split</p> <p style="text-align: center;">Page 54</p>
<p>1 feed? 2 MR BROWN: The recorder itself allows for the two processes 3 to be run simultaneously -- 4 Q. Yes. 5 MR BROWN: -- without the need for a split-feed system -- 6 Q. Right. 7 MR BROWN: -- but that all depends upon how many people are 8 intending to listen and how many people are intending to 9 review. 10 If there was one person intending to listen live and 11 there was one person intending to review. 12 Q. Yes? 13 MR BROWN: Then the machine in itself would be capable of 14 doing that. 15 Q. Without a split feed? 16 MR BROWN: Without a split feed. 17 Q. What benefit does the split feed add to what you have 18 just described? 19 MR BROWN: A split feed has been mentioned in the way that 20 the machine was configured for this operation. 21 Q. Yes. 22 MR BROWN: So the machine was configured for this operation 23 whereby the output of the recorder goes into the 24 headphone amplifier. We have heard evidence that 25 suggests that when people are listening to that feed, if</p> <p style="text-align: center;">Page 55</p>	<p>1 the review function is activated, everybody listening to 2 that feed listens to the review function and the ability 3 to live listen has been lost. 4 Q. Right. 5 MR BROWN: I mean there is a statement to suggest the reason 6 why is that occurred. 7 Q. Yes. 8 MR BROWN: In that this is a legislative and a compliance 9 issue, which I think Mr Storey will explain a little bit 10 more in detail. 11 Q. Yes. 12 MR BROWN: But nonetheless that is a procedure as opposed to 13 a necessity within the recording hardware. 14 Q. Right. 15 MR BROWN: So it can be dealt with independently, and that 16 is just a matter of process and a matter of compliance. 17 But the way that the device was configured for this 18 operation, to enable somebody to live listen as well as 19 having the review functionality, then you would have to 20 split the feed before it reached the recorder, one feed 21 going into a live-listening function, which may involve 22 another headphone distribution amplifier and another set 23 of headphones -- 24 Q. Right. 25 MR BROWN: -- and then the other side of the split would go</p> <p style="text-align: center;">Page 56</p>

<p>1 into the recorder and provide you with the review 2 functionality and the ability to listen back over and 3 over again. 4 Q. Is there anything that you have heard during the course 5 of the evidence provided to the inquiry, or read in the 6 documentary statements and supporting exhibits that you 7 have seen, to indicate why that wasn't something that 8 could have been done on the morning? 9 MR BROWN: No, understanding the operational requirement and 10 providing the equipment, that should have been an easy 11 task to perform. 12 Q. Thank you. 13 Mr Brown, do you have any comment to make on the 14 equipment maintenance in the records that you have seen? 15 MR BROWN: Well, there aren't any. 16 Considering that the -- there is mention in the 17 Obelisk record of the fault of the recorder and who 18 dealt with that within the CMP on the morning itself. 19 Q. Yes. 20 MR BROWN: I certainly would have expected that that part of 21 the process involving the maintenance, repair and 22 understanding of what went wrong would have been 23 documented and there certainly would have been some sort 24 of repair record in compliance with some of the 25 procedures that are set out in the documentation.</p> <p style="text-align: center;">Page 57</p>	<p>1 Q. But you haven't seen that? 2 MR BROWN: No. 3 Q. Mr Storey, I am going to turn to you now and ask you 4 some questions about the staffing of the CMP. 5 I am going to ask, Mr Coates, for us to display 6 COP79, please. 7 Page 5. 8 In the second paragraph under "Introduction", we see 9 the following: 10 "The deployment of technical surveillance equipment, 11 its operational use, processing and data analysis must 12 be undertaken by licensed and competent staff. All 13 technical surveillance operatives require a licence to 14 operate within the various disciplines, licences are 15 issued to competent operatives by the College of 16 Policing in accordance with current guidelines and 17 criteria. A person can demonstrate competency if they 18 have successfully completed an assessed and accredited 19 training course that has included this type of 20 deployment. Competency can be defined as the collection 21 of knowledge, skills, behaviour, performance and 22 qualifications to safely perform a specific task. 23 "Staff in the TSU should keep up to date with the 24 latest techniques and equipment and only devices that 25 have been approved by use by TSUs will be deployed and</p> <p style="text-align: center;">Page 58</p>
<p>1 the deployment of technical surveillance equipment is 2 supported by confidential standard operating procedures 3 (SOPs) available from the force TSU manager." 4 Can we go to page 22 of the same document, please, 5 Mr Coates. 6 MR STOREY: Sir, if it assists, if I might point out, you 7 have quoted there from the TSU APP, which is not the 8 same APP which governs the management of Covert 9 Monitoring Posts. 10 Q. Right. We will turn -- 11 MR STOREY: Although it will broadly reflect -- it will 12 broadly reflect what is required. However, I should 13 note the word "competency" is mentioned there, whereas 14 in the APP for the management of Covert Monitoring 15 Posts, it is "accreditation", at this time. 16 Q. That was as at December 2015? 17 MR STOREY: Yes, that's correct, sir. 18 Q. What is the difference in your view between the two? 19 MR STOREY: The difference in the two is the way at the time 20 that the College was able to provide training, because 21 in Mr Brown's field, of the TSU operatives, it is very 22 much structured and there is a lot of compliance with 23 electrical regulations, et cetera, et cetera. And truly 24 competent skills, yes, in terms of can you do that or 25 can you not do it.</p> <p style="text-align: center;">Page 59</p>	<p>1 Q. Yes. 2 MR STOREY: In terms of the management of Covert Monitoring 3 Posts, it was decided at the time that they couldn't 4 accredit it, because it was difficult -- sorry, they 5 couldn't make it a competency-based licensing because it 6 was very difficult for them to define the competencies 7 that were actually involved in running and listening to 8 product from a Covert Monitoring Post. 9 Q. Yes. 10 MR STOREY: So the difference between the two is one expects 11 competency, the other expects accreditation. 12 Q. Right. 13 You have mentioned in the course of your answer 14 there the Covert Monitoring Post manager. You, I know, 15 have been able to follow the evidence on this issue as 16 has been received by the inquiry -- 17 MR STOREY: That's correct, sir. 18 Q. -- particularly from officer FE19 and the decisions 19 provided by him, and other officers, as to why in their 20 view it was not necessary to appoint a Covert Monitoring 21 Post manager for this operation. 22 One of the reasons given was because this was not 23 a long-running operation and was expected to, and indeed 24 did, only last a matter of hours. 25 I would like your view, please, on the various</p> <p style="text-align: center;">Page 60</p>

1 explanations as to why a Covert Monitoring Post manager
 2 was not required, and indeed for you to explore, please,
 3 for us, the benefits that that would have brought if it
 4 had been something that was acted upon?
 5 MR STOREY: Sir, it is quite clear in APP, there are no time
 6 constraints on the length of an operation or otherwise.
 7 It merely states that if you are going to run a Covert
 8 Monitoring Post, then a Covert Monitoring Post manager
 9 will be appointed.
 10 So it is a pivotal role. Much akin to if you have
 11 a surveillance team being deployed, you have
 12 a surveillance team leader. If you have a set of TSU
 13 operatives being deployed, you would have a senior TSU
 14 manager or supervisor in charge of them.
 15 Equally so in a CMP, because it is, again,
 16 a specialist surveillance technique and requires
 17 officers to be trained and experienced and accredited
 18 where possible.
 19 The CMP manager is a pivotal role in that it would
 20 be somebody that had invariably performed the function
 21 of having been a monitor in a CMP and gained experience
 22 and, if you like, climbed up the ranks. It is not
 23 necessarily a supervisory matter, but the person in that
 24 role has a supervisory responsibility for the CMP.
 25 Q. Yes.

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1 MR STOREY: If I tell you, sir, if I can refer back to my
 2 report, it says in the checklist -- so page 11, if it
 3 assists, paragraph 51.
 4 MS BLACKWELL: Thank you.
 5 THE CHAIRMAN: Thank you.
 6 MR STOREY: It says:
 7 "SIO/OIC must be appointed and fulfil key roles and
 8 responsibilities. CMP manager must be appointed and
 9 fulfil key roles and responsibilities."
 10 THE CHAIRMAN: Thank you.
 11 MS BLACKWELL: Have you been able to consider the level of
 12 training that had been received by those who were chosen
 13 to staff the CMP?
 14 MR STOREY: I have been able to look at what the officers
 15 have recorded in their statements as to the last time
 16 they may have been deployed in a CMP and where they may
 17 have indicated some training but there was -- in the
 18 absence of a skills matrix or a training matrix being
 19 held by those officers that engaged in covert
 20 monitoring, I am unable actually to, with any definity
 21 to actually say whether they would meet the criteria to
 22 actually perform in a CMP or be assigned the roles in
 23 a CMP or not.
 24 Q. Some of them had not had any training and the height of
 25 the training of those who had received it appeared to be

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1 MR STOREY: So the CMP manager would be responsible for
 2 selecting the correct staff, for liaising with the TSU,
 3 for liaising with the covert authorities unit and some
 4 other bits and pieces, which obviously are delegated to
 5 him by and on behalf of the SIO.
 6 Q. Right.
 7 Whose responsibility was it to appoint a CMP
 8 manager?
 9 MR STOREY: It is the SIO's.
 10 Q. Right.
 11 Are you impressed by the reasons that have been
 12 given as to why one was not appointed?
 13 MR STOREY: No, sir.
 14 Q. Does it follow from that, Mr Storey, that you are of the
 15 view that a CMP manager should have been appointed?
 16 MR STOREY: Well, as I have said, sir, not only am I of the
 17 opinion one should have been appointed, particularly
 18 when you look at the -- in my view the level of risk
 19 that the operation carried and its own individual
 20 pieces, so not only do I think one should have been
 21 because of my experience but also APP says that one will
 22 be appointed.
 23 Q. Right.
 24 THE CHAIRMAN: Not should, not may, but will? I am asking,
 25 I don't know.

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1 on a deployment-by-deployment basis. So nothing more
 2 than being shown how to use a particular piece of kit or
 3 equipment.
 4 Is that satisfactory in your view?
 5 MR STOREY: No, sir, but I might add, to my knowledge it has
 6 occurred elsewhere as well.
 7 It tends to be and sort of is read into the
 8 statements I have read, is that manning a CMP or
 9 staffing a CMP was actually handed down, so it was more
 10 cascade trained rather than actually trained in
 11 a correct manner to national occupational standards.
 12 Q. Okay.
 13 This may seem like an obvious question, but I am
 14 going to ask it anyway. What are the consequences of
 15 selecting staff without the requisite training or indeed
 16 qualifications?
 17 MR STOREY: Much like a surveillance team -- much like
 18 a conventional surveillance team, you are a technical
 19 surveillance team, or it is a team working with a --
 20 receiving another intelligence feed from a technical
 21 surveillance device. So everybody through their
 22 training and experience understands what their
 23 responsibilities are and who should deal with issues at
 24 which level --
 25 Q. Yes.

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<p>1 MR STOREY: -- and who should brief them.</p> <p>2 Therefore, it becomes a very disjointed affair</p> <p>3 within the CMP if you don't have sufficient training,</p> <p>4 and people tend to shrink into just the bit they can do,</p> <p>5 as opposed to what they are expected to do.</p> <p>6 What can happen is that you get a breakdown of unity</p> <p>7 within the CMP, not arguments but you get a breakdown in</p> <p>8 function, in performance within the CMP, if people have</p> <p>9 not had the appropriate training and they have not been</p> <p>10 able to practice the skills they are expected to</p> <p>11 deliver.</p> <p>12 Q. Thank you.</p> <p>13 Mr Brown, I would like to come back to you now,</p> <p>14 please, and touch upon something which you have already</p> <p>15 helped us with, and that is the period of time between</p> <p>16 the decisions made to use the Covert Monitoring Post in</p> <p>17 conjunction with the audio probes that were fitted to</p> <p>18 the Audi back in November and the lack of any action</p> <p>19 between then and, really, I am going to suggest, a day</p> <p>20 or two before the deployment. Because the inquiry has</p> <p>21 heard that it wasn't until 10 December and/or the</p> <p>22 morning of the deployment on 11 December that the</p> <p>23 operatives in the Covert Monitoring Post were shown the</p> <p>24 equipment and had an explanation provided to them as to</p> <p>25 how to use it.</p> <p style="text-align: center;">Page 65</p>	<p>1 In your opinion, is that something that should have</p> <p>2 happened earlier, and, in conjunction with that, do you</p> <p>3 believe that the identification of those operatives</p> <p>4 should have happened at the earliest opportunity in</p> <p>5 order to facilitate the training?</p> <p>6 MR BROWN: The requirement for a Covert Monitoring Post</p> <p>7 would have been established very early on when the</p> <p>8 operational requirement was discussed.</p> <p>9 Q. Right.</p> <p>10 MR BROWN: I would suggest to the inquiry that that would</p> <p>11 have been considered at one of the strategic planning</p> <p>12 meetings that the TSU attended in conjunction with the</p> <p>13 investigation team. So the requirement for a CMP would</p> <p>14 have been known at a very early stage, at least</p> <p>15 24 November, if not sooner.</p> <p>16 Q. Yes.</p> <p>17 MR BROWN: That would have allowed the TSU to understand</p> <p>18 what the requirement was for the CMP, as far as</p> <p>19 equipment was concerned, as well as the staff who were</p> <p>20 eventually going to deploy the equipment into the</p> <p>21 vehicle.</p> <p>22 Q. Yes.</p> <p>23 MR BROWN: There would have been a multi-layered approach to</p> <p>24 this, there would have been the CMP element of the</p> <p>25 operation, there would have been the installation of</p> <p style="text-align: center;">Page 66</p>
<p>1 probe into the vehicle operation. That would have</p> <p>2 involved multiple people, some of them may well have</p> <p>3 crossed over --</p> <p>4 Q. Right.</p> <p>5 MR BROWN: -- in what they were doing. But if the CMP was</p> <p>6 set up at an early stage, then certainly the testing of</p> <p>7 the equipment could have taken place -- regardless of</p> <p>8 whether it was installed into the mission vehicle or</p> <p>9 not. Certainly the end-to-end testing of the device to</p> <p>10 the CMP could have taken place multiple times and any</p> <p>11 issues could have been ironed out very early on.</p> <p>12 Q. Yes.</p> <p>13 MR BROWN: The decision to discuss how that was being</p> <p>14 recorded or reviewed could have taken place with the</p> <p>15 investigation team so they understood the limitations of</p> <p>16 the equipment that was available to them and could have</p> <p>17 made certainly representations to the TSU, whether that</p> <p>18 would be or would not be acceptable.</p> <p>19 Q. Right.</p> <p>20 MR BROWN: Then changes could have taken place. So it is</p> <p>21 using that process that we did earlier on.</p> <p>22 Q. Yes.</p> <p>23 MR BROWN: In the same manner as the installation for the</p> <p>24 probe in the vehicle, that should have taken place for</p> <p>25 the installation of the CMP at the same time.</p> <p style="text-align: center;">Page 67</p>	<p>1 Q. Yes.</p> <p>2 MR BROWN: Had that have been set up, and again I don't know</p> <p>3 the constraints or the limitations of staffing levels or</p> <p>4 other things that were going on at the time, if the</p> <p>5 staff had been identified at an early stage, then more</p> <p>6 training could have been provided to them, weeks before</p> <p>7 the deployment of the day, and they would have been more</p> <p>8 familiar with the equipment, they could have tested,</p> <p>9 practised, and got used to the equipment, especially if</p> <p>10 they had not used it before. To do that type of</p> <p>11 training either the day before or on the day of the</p> <p>12 operation is strange.</p> <p>13 THE CHAIRMAN: Does it follow that the CMP manager too</p> <p>14 should have been appointed at an early stage?</p> <p>15 MR STOREY: Yes, sir, if I may, and I have referred to it on</p> <p>16 page 12 of my report, paragraph 55.</p> <p>17 I think I have suggested that a CMP manager could</p> <p>18 have been appointed as early as 11 November, and as late</p> <p>19 as 3 December, which would then have given a period of</p> <p>20 time before operational deployment for a number of</p> <p>21 matters to be discussed and identified and for staff to</p> <p>22 have been given some training and familiarisation.</p> <p>23 THE CHAIRMAN: Thank you.</p> <p>24 MS BLACKWELL: Mr Storey, have you had the opportunity to</p> <p>25 consider the evidence of the witnesses Reddy, Hawthorn</p> <p style="text-align: center;">Page 68</p>

<p>1 and FE12 about the conduct of the CMP?</p> <p>2 MR STOREY: Yes, I have, sir.</p> <p>3 Q. And the way in which the feed was received by</p> <p>4 Mr Hawthorn listening to it, who then relayed what he</p> <p>5 had heard to Mr Reddy and FE12, who then ran in and out</p> <p>6 of the CMP to the control room, providing that</p> <p>7 information, primarily, to the TFC, Mr Williams.</p> <p>8 What is your opinion of that setup?</p> <p>9 MR STOREY: Although it served a function, it has certain</p> <p>10 obvious issues with the way that it was actually</p> <p>11 conducted, for instance when DS Reddy was relaying to</p> <p>12 the officers that were to take it out, FE12 or FE13,</p> <p>13 then that would mean that he wouldn't be listening to</p> <p>14 the product.</p> <p>15 Q. Yes.</p> <p>16 MR STOREY: Then also you have the fact of, you have in my</p> <p>17 opinion too many people in the CMP.</p> <p>18 Q. Right.</p> <p>19 MR STOREY: What you have is you have got five personnel in</p> <p>20 there, two of which ostensibly look like they are</p> <p>21 monitoring, and that would be FE24 and 25 and DS Reddy,</p> <p>22 and then you have also got FE --</p> <p>23 Q. 12.</p> <p>24 MR STOREY: 12 and one other officer.</p> <p>25 Q. Mr Hawthorn?</p> <p style="text-align: center;">Page 69</p>	<p>1 MR STOREY: No, sorry, you have got Mr Hawthorn listening --</p> <p>2 Q. Yes, and then Mr Reddy and FE12?</p> <p>3 MR STOREY: Mr Reddy and FE12 are actually taking the</p> <p>4 product or relaying the product out to the TFC.</p> <p>5 Having the two Turkish officers was probably, on</p> <p>6 what was known in the pre-planning stage, that was</p> <p>7 probably an accurate selection of those officers at the</p> <p>8 time. However, fairly quickly after surveillance was</p> <p>9 commenced, it should have been -- it was never</p> <p>10 relayed -- I don't know if it was never relayed, but the</p> <p>11 actual makeup of the individuals in the mission vehicle,</p> <p>12 you could then have taken a view linguistically to</p> <p>13 dynamically profile them and say, "Okay, this is going</p> <p>14 to be in English as opposed to going to be in Turkish"</p> <p>15 and potentially those two officers could have been</p> <p>16 withdrawn, FE24 and FE25 could have been withdrawn from</p> <p>17 the CMP.</p> <p>18 Q. Would that have been your decision at that time?</p> <p>19 MR STOREY: Well, no, because obviously staffing levels</p> <p>20 might have meant you might still have had to actually</p> <p>21 had them or one of them there, but what it would have</p> <p>22 meant was you would have briefed them then slightly</p> <p>23 differently to say, okay your brief is now this, you</p> <p>24 have got to listen to all conversation because, from my</p> <p>25 recollection, one of those officers was told that he was</p> <p style="text-align: center;">Page 70</p>
<p>1 only briefed to translate Turkish, which leaves me to</p> <p>2 wonder what was he doing all the time that the English</p> <p>3 was being spoken: was he actually really concentrating</p> <p>4 on what was being said or was he just listening for</p> <p>5 a pickup in Turkish?</p> <p>6 Q. Can I ask you to pause there, please, because we will</p> <p>7 come back to the procedure that was adopted in terms of</p> <p>8 relaying the information, but you have touched there</p> <p>9 upon briefings. I would like you to give us the wisdom</p> <p>10 of your experience, in terms of what level of briefing</p> <p>11 was it appropriate to give to the operatives in the CMP</p> <p>12 in terms of the operation itself and specifically on the</p> <p>13 morning, what was important for them to listen out for,</p> <p>14 whether that sort of level of briefing would have been</p> <p>15 appropriate or not?</p> <p>16 MR STOREY: Yes, in my opinion, and experience, it would</p> <p>17 have been, but that is the duty of the CMP manager on</p> <p>18 behalf of the SIO to deliver that.</p> <p>19 Q. Right.</p> <p>20 MR STOREY: Just like the conventional surveillance team</p> <p>21 would have had their own briefing, the firearms team</p> <p>22 would have had their own briefing, the officers being</p> <p>23 deployed to listen in the Covert Monitoring Post should</p> <p>24 also have had their own briefing relating to how the</p> <p>25 morning was going to pan out in the CMP and what was</p> <p style="text-align: center;">Page 71</p>	<p>1 expected of them.</p> <p>2 Also, the CMP manager's role is also in one sense</p> <p>3 a conduit of stuff going out of the CMP, but also</p> <p>4 a firewall and a filter for intelligence that needs to</p> <p>5 come into the CMP to properly brief your monitors,</p> <p>6 because you don't want to overbrief, because then you</p> <p>7 may fall victim of tainting those individuals so they</p> <p>8 are already expecting what to listen to and if the</p> <p>9 quality of the audio is questionable -- which I am not</p> <p>10 suggesting it was on this occasion -- they can have what</p> <p>11 is known as psychoacoustic suggestion, so because they</p> <p>12 already know of the pre-existence of a fact or an item,</p> <p>13 when listening, if the audio isn't quite clear, the</p> <p>14 brain goes, "Oh yeah, I have heard that before, so they</p> <p>15 must have said that".</p> <p>16 We try and avoid that, so although you wouldn't have</p> <p>17 wanted to overbrief them about the detail, what you</p> <p>18 would need to do is you would need to give them, and</p> <p>19 where I work, the SIO completes a document that actually</p> <p>20 says specifically for this operation, "I want you to</p> <p>21 listen for this, this, this, and this".</p> <p>22 Q. That would be provided to the Covert Monitoring Post</p> <p>23 manager?</p> <p>24 MR STOREY: Yes.</p> <p>25 Q. Then what would be the manager's role in disseminating</p> <p style="text-align: center;">Page 72</p>

<p>1 that material?</p> <p>2 MR STOREY: Depending where the material had come from, if</p> <p>3 it had come from a sensitive intelligence source, it may</p> <p>4 be necessary to sanitise that further before it went</p> <p>5 into the CMP. Not only because of the sensitivity, but</p> <p>6 also because you don't want to taint them.</p> <p>7 If, say, for instance, I don't want to go to another</p> <p>8 point, but I know for instance there has been some</p> <p>9 discussion about where should the intelligence that at</p> <p>10 10.00 pm, the evening previous, there had only had</p> <p>11 an indication that they had only been able to get --</p> <p>12 Q. An imitation firearm?</p> <p>13 MR STOREY: An imitation firearm, you would never want to</p> <p>14 implant that to the people that are monitoring, but you</p> <p>15 would probably disseminate that as far as the CMP</p> <p>16 manager, who would then have instructed his staff to</p> <p>17 say:</p> <p>18 "Right, we know it is a firearms operation today,</p> <p>19 there will be discussion about firearms, hopefully,</p> <p>20 there might be discussion about ammunition, there might</p> <p>21 be discussion about pyrotechnic devices or smoke</p> <p>22 grenades. So if you hear anything relating to this,</p> <p>23 this, this and this, I want to hear that straight away."</p> <p>24 That is the way you would sanitise, or I would</p> <p>25 sanitise, that bit of information, to make sure they</p> <p style="text-align: center;">Page 73</p>	<p>1 understood exactly what the focus of the operation was.</p> <p>2 In their terms.</p> <p>3 MS BLACKWELL: Yes, so the importance from what you have</p> <p>4 described is that the Covert Monitoring Post manager is</p> <p>5 fully informed and then they have the ability to assess</p> <p>6 what is appropriate by way of further dissemination?</p> <p>7 MR STOREY: Yes, that is why the CMP manager is the pivotal</p> <p>8 role.</p> <p>9 Q. Right.</p> <p>10 Let's return then, please, to the setup, the</p> <p>11 procedure that was adopted in terms of Mr Hawthorn and</p> <p>12 possibly the two Turkish officers listening to the feed</p> <p>13 and then relaying that to Mr Reddy and FE12, who were</p> <p>14 physically taking that information into the control</p> <p>15 room.</p> <p>16 What is your view on that? That system?</p> <p>17 MR STOREY: It is not something I would have chosen, I would</p> <p>18 have tried to explore other options. However, it</p> <p>19 appears to have fulfilled in part the operational need</p> <p>20 for the CMP in terms of indicating that the mission</p> <p>21 vehicle was in occupancy, and that the conversation was</p> <p>22 in general in relation to firearms.</p> <p>23 I think there has been a -- having seen some of the</p> <p>24 transcripts, there has been some confusion in what</p> <p>25 people have listened to and maybe some confusion as to</p> <p style="text-align: center;">Page 74</p>
<p>1 what has then been relayed, so by building additional</p> <p>2 levels in to the assessment and transposition of</p> <p>3 material generated by the audio probe, what you then</p> <p>4 appear to have got is a breakdown in the true meaning of</p> <p>5 what has actually been captured. Therefore that affects</p> <p>6 any assessments then made by people further along the</p> <p>7 chain.</p> <p>8 Q. I am just going to ask us to look at the document that</p> <p>9 was prepared in fact by the IPCC, it is a comparison</p> <p>10 document.</p> <p>11 Mr Coates, it is MPS229.</p> <p>12 We don't need to look at this in any great detail,</p> <p>13 can you just enlarge it, please, but just to remind</p> <p>14 ourselves that this document, usefully, has a comparison</p> <p>15 drawn between the transcript of the audio and what FE12</p> <p>16 and also Mr Williams have recorded. I think that this</p> <p>17 demonstrates the point you are making, Mr Storey, that</p> <p>18 the paucity of notetaking and the lack of clarity leads</p> <p>19 in some instances to a mistake in the meaning of what is</p> <p>20 being said.</p> <p>21 MR STOREY: Yes.</p> <p>22 However, the only reflection I have is that whereas</p> <p>23 on the left we probably have a transcript that some time</p> <p>24 was taken in review to prepare it --</p> <p>25 Q. Yes, absolutely.</p> <p style="text-align: center;">Page 75</p>	<p>1 MR STOREY: -- it is quite a skill to be able to crystallise</p> <p>2 what you are hearing in the headphones and record it</p> <p>3 accurately, in order that it can then go on elsewhere,</p> <p>4 but, yes, it does demonstrate that, sir.</p> <p>5 THE CHAIRMAN: The greater the skill involved, the more</p> <p>6 important to have people who are properly trained?</p> <p>7 MR STOREY: Correct, sir.</p> <p>8 MS BLACKWELL: Thank you, can we take that down, please.</p> <p>9 I would just like to press you a little more on what</p> <p>10 I think you were going to expand upon before I took you</p> <p>11 somewhere else. It is the system that was employed by</p> <p>12 Mr Hawthorn in particular of his listening to the feed</p> <p>13 but then repeating it to the other two officers and the</p> <p>14 lacuna that that left in terms of what was happening on</p> <p>15 the live feed whilst he was repeating.</p> <p>16 MR STOREY: Yes.</p> <p>17 Q. How would you have better managed that to avoid that</p> <p>18 lacuna?</p> <p>19 MR STOREY: The issue is how do you record the material that</p> <p>20 comes into a CMP, so we have a document called an audio</p> <p>21 monitoring record, which your primary monitors -- as</p> <p>22 I said, quite a lot of people in the CMP, I would have</p> <p>23 expected to have seen two officers acting as primary and</p> <p>24 secondary monitor, supported by a third for comfort</p> <p>25 breaks and a CMP manager as a maximum.</p> <p style="text-align: center;">Page 76</p>

1 Because Covert Monitoring Posts physically tend to
 2 be quite small paces, they are not allotted a vast
 3 estate. I would have expected that the people that were
 4 listening to the live -- I will use the phrase live
 5 feed, the people that were listening to the live feed,
 6 that they would have completed an AMR, an audio
 7 monitoring record, which basically, it is not, but it
 8 reflects a surveillance logbook, because it is another
 9 surveillance skill, so it reflects a loggist's logbook.
 10 Q. Right.
 11 MR STOREY: That would have then meant that you had two
 12 people free, one person to have reviewed and they would
 13 have conducted that in a review AMR, making the
 14 difference between the documents.
 15 Leaving the CMP manager to actually elicit whatever
 16 material and information and intelligence he needed to
 17 from what was being written, yeah, and then to take that
 18 out in whatever form it was chosen to update the TFC and
 19 the SIO, to be honest, but TFC first in this case and
 20 then the SIO.
 21 I know that from the officers that were there, it
 22 was decided by them that writing in an AMR was adduced
 23 to be impracticable on the occasion, so they decided to
 24 write on a number of loose leafs.
 25 Q. Yes.

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1 sophisticated than that?
 2 MR STOREY: No, nothing more sophisticated than that. That
 3 was why I was a little bit confused by the Turkish
 4 speaking officers. It was actually because they hadn't
 5 been briefed properly, because there hadn't been a CMP
 6 manager.
 7 Q. From your description of a better system, the CMP
 8 manager would himself be involved in deciding perhaps
 9 which information should be disseminated back to the
 10 control room, because that person would have been privy
 11 to the intelligence and a larger briefing from the SIO
 12 or the TFC?
 13 MR STOREY: That's correct, sir. In fact I would go further
 14 to say that as a CMP manager, I think the expectation is
 15 that you would be the person that is doing the
 16 reviewing, because then you have actually listened to
 17 the product, and you can go then out to the TFC and
 18 relay to them directly what you have heard.
 19 Q. Right, so what was your overall view of the conduct of
 20 the CMP on this occasion?
 21 MR STOREY: As I said, I think that probably the people in
 22 the CMP made their best efforts with the experience they
 23 had previously had, but some of them with no training;
 24 however, as I have said, you get a dysfunctionality
 25 amongst that team and people start to become more

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1 MR STOREY: But the point is that the system fell down, as
 2 you have just pointed out, through highlighting on this
 3 document, the system fell down, not only in terms of
 4 what was written but what was actually heard because
 5 there were gaps in what Mr Hawthorn was hearing when he
 6 was actually telling the other officers what to take out
 7 to the TFC.
 8 From a document point of view, had you had a CMP
 9 manager established early enough, the CMP manager said
 10 okay what are we going to be expected to supply out, in
 11 terms of intel, to the bigger room.
 12 Q. Yes.
 13 MR STOREY: They might have looked at using a document that
 14 was self carbonated, whereby you could periodically tear
 15 one strip out and take that out, and then you obviously
 16 have a written record that the TFC could keep hold of.
 17 Whereas trying to make notes from other people's
 18 notes or notes from something that a third party had
 19 heard, it really dilutes or unnecessarily dilutes the
 20 process and actually the intelligence or information
 21 that needs to be supplied.
 22 Q. From what you have said, one of the best ways to avoid
 23 missing information by the way in which Mr Hawthorn
 24 accepted he was missing information, would have been to
 25 have two people listening at the same time, nothing more

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1 introvert instead of embracing their responsibilities on
 2 the day.
 3 Q. Yes.
 4 MR STOREY: So maybe, and this is just a view, but maybe the
 5 Turkish speaking officers might have heard something
 6 different than DC Hawthorn heard, but yet maybe they
 7 didn't have the confidence to actually volunteer that
 8 because of the briefing that certainly one of them had
 9 had just to listen to and translate Turkish.
 10 Q. In what you have described as the way in which the CMP
 11 should have been set up, would there have been
 12 an operative able to review any interesting and
 13 important pieces of information that came into the CMP
 14 via the audio probe?
 15 MR STOREY: Yes, sir, you would either instruct the
 16 additional staff member who is supporting the two
 17 primary and secondary monitors or as CMP manager, on
 18 something like this, it is probably more likely that you
 19 would do it yourself.
 20 Q. As CMP manager, if something came in which was obviously
 21 of importance, but needed clarification, you would take
 22 it upon yourself to use that review function until you
 23 were as sure as you could be as to what had been said?
 24 MR STOREY: That would be my desire, yes, sir.
 25 Q. Before we leave the Covert Monitoring Post, can I just

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1 return to you, please, Mr Brown, and ask you to confirm
 2 that if a split feed had been set up, that the review
 3 function, if faulty, could have been repaired or reset
 4 without interrupting the live feed?
 5 MR BROWN: Yes, that's correct.
 6 Q. Was a split feed good practice as at December 2015?
 7 MR BROWN: It certainly would have been something that
 8 I would have introduced had I have been setting up a CMP
 9 in my own force.
 10 Q. Thank you.
 11 Finally, I want to turn to an additional piece of
 12 evidence, Mr Brown, which you have provided to us in
 13 your addendum statement to clarify what you originally
 14 stated in your main statement in terms of the effect
 15 that the microphones selected for the probe may have had
 16 on the sound of the gunshot on the recording.
 17 I am going to do no more than take you through the
 18 addendum statement that you have provided, because it is
 19 certainly my view that this provides clarity to
 20 an important issue for the inquiry.
 21 Could I invite you, please, to take up your
 22 additional report, your addendum, and I am going to read
 23 each paragraph and ask you to confirm its accuracy,
 24 please.
 25 Let's start at paragraph 5.

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1 and whilst the sounds generated have been clipped to
 2 an extent whereby the full dynamic range cannot be seen,
 3 it does not appear that any non-recording has taken
 4 place, more that clipping has occurred and therefore it
 5 is more likely than not that the sound of the discharge
 6 would have been captured, albeit clipped?
 7 MR BROWN: That's correct, sir.
 8 Q. That is also referenced in Mr French's statement at
 9 paragraphs 25 to 28 and 30.
 10 In your original instruction, you were not asked to
 11 consider the timing of the discharge. However, you have
 12 been now asked to comment on the statement provided by
 13 Mr French and provide an opinion on his findings. That
 14 was something you were asked to do following the
 15 completion of your first report, wasn't it?
 16 MR BROWN: That's correct, sir.
 17 Q. You confirm that you are not a forensic ballistic audio
 18 expert and you do not hold any formal forensic
 19 qualifications, but it is your interest in audio,
 20 experience in the technical audio arena and in teaching
 21 audio principles at the College, based on your knowledge
 22 and experience, which allows you to make comment on such
 23 matters?
 24 MR BROWN: Yes, sir.
 25 Q. In INQ29, at paragraphs 11 and 12, Mr French makes

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1 Sir, I think your additional statement might be
 2 slotted in behind the main statement, which is at tab 2.
 3 THE CHAIRMAN: Thank you very much.
 4 MS BLACKWELL: In your original report you made reference to
 5 the possibility that the discharge of the firearm may
 6 not have been captured or clipped due to the acoustic
 7 overload point being reached in the microphone; is that
 8 right.
 9 MR BROWN: That's correct, sir.
 10 Q. "This assumption of the discharge not being captured was
 11 based on a theoretical possibility whereby certain
 12 conditions are present in both the microphone and the
 13 pre-amplifier of the device whereby the electronics are
 14 overloaded and would cause the non-recording of the
 15 sound. If the criteria was not met then the sound would
 16 be recorded but clipped."
 17 MR BROWN: That's correct, sir.
 18 Q. "When the sound is clipped, it reduces the level of the
 19 sound to the maximum level that the equipment can
 20 capture and would therefore present itself as another
 21 loud sound in the recording, with no opportunity to
 22 compare the amplitude or the loudness of the sounds."
 23 MR BROWN: That's correct, sir.
 24 Q. You have now had the opportunity of examining the
 25 spectrogram contained in the statement of Alan French,

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1 reference to four loud bangs at the start of the
 2 recording. It is your opinion that the first four
 3 sounds were both consistently loud and timed apart, that
 4 you originally thought there may be some sort of
 5 pyrotechnic device.
 6 MR BROWN: Yes, sir.
 7 Q. However, you now concede that if evidence has been given
 8 that there were bangs on the car window or door, which
 9 it has, then you would be wrong of your original
 10 assumption of a pyrotechnic device but nonetheless those
 11 sounds in your opinion are consistent in amplitude and
 12 have a similar sound structure in the audiogram, which
 13 would suggest that the bangs were hitting the same
 14 structure on each occasion?
 15 MR BROWN: Yes, sir.
 16 Q. All right.
 17 At paragraph 14, Mr French suggests that the sound
 18 is possibly the car door and you wouldn't be in
 19 a position to say whether or not that is correct, but
 20 you do agree with his observation that, given the
 21 proximity of W80 to the door, and the microphones in the
 22 vehicle, that sound would not be loud enough to warrant
 23 it being the discharge of the gun?
 24 MR BROWN: Yes, sir.
 25 Q. You then refer to paragraphs 17 to 20 of Mr French's

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1 report, in which he outlines his rationale surrounding
 2 the noise at just under 5 seconds being the discharge of
 3 the firearm.
 4 MR BROWN: Yes, sir.
 5 Q. You say that the sound at 4.8 seconds is certainly loud
 6 and has sufficient amplitude at the lower frequencies
 7 and that the sound also has some resonance in that it
 8 continues for a period of time. It is certainly not
 9 speech, as these are clearly identified on the audiogram
 10 as complex waves within fundamental and harmonic
 11 frequencies and due to the fact that there was a lot of
 12 clipping at that stage, it is difficult for you to see
 13 how loud the actual sound compares to other sounds such
 14 as the four loud bangs at the beginning of the
 15 recording, as they reach the same amplitude and stop due
 16 to the clipping.
 17 What is noticeable to you is that the sound at 4.8
 18 seconds has an intensity throughout the available
 19 frequency range. You say that if extra dynamic range
 20 was available, it would have made it easier to
 21 differentiate the different sounds in the recording?
 22 MR BROWN: Yes, sir.
 23 Q. Given the proximity of W80 to the open car door and the
 24 position of the microphones, it would be difficult to
 25 not consider this as the discharge of the weapon, as

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1 Sir, that concludes my questions for both gentlemen,
 2 I am told that there are no questions from any of other
 3 core participants.
 4 Of course we need to go into closed session. I am
 5 going to ask for a short break so that I can assess the
 6 extent of the evidence we need to hear in closed
 7 session. I don't anticipate that will take us longer
 8 than 10 minutes, so --
 9 THE CHAIRMAN: Before we do, can I ask two questions --
 10 MS BLACKWELL: Certainly.
 11 THE CHAIRMAN: -- at the conclusion of this session.
 12 Questions from THE CHAIRMAN
 13 THE CHAIRMAN: It is a question directed to both of you,
 14 although each of you will answer it separately.
 15 Each of you has expressed what might be described as
 16 criticism, varying from minor to major, at what you
 17 perceive to be failings in the systems to which your
 18 areas of knowledge of subject matter related.
 19 Could any of those criticisms be said objectively to
 20 amount to counsels of perfection, because I am
 21 concerned, obviously, with what is a reasonable
 22 response, what is reasonable conduct within the ambit of
 23 a police operation.
 24 The second question is this, do any of your
 25 criticisms reflect changes which have taken place since

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1 there are no other sounds after the initial four bangs
 2 with such intensity and amplitude?
 3 MR BROWN: Yes, sir.
 4 Q. That is as far as you can take the matter within your
 5 level of experience?
 6 MR BROWN: That's correct.
 7 THE CHAIRMAN: We of course, in addition to that, in
 8 deciding which of the five loud bangs is the discharge
 9 of the firearm, are entitled to, and indeed must, take
 10 into account the volume of the voices which were
 11 initially, one would think, coming from outside the
 12 immediate area of the probe.
 13 MS BLACKWELL: Yes.
 14 THE CHAIRMAN: Until after the fourth bang, when they appear
 15 to be much more detectable.
 16 MS BLACKWELL: Yes, quite so. Which would be consistent
 17 with the car door opening.
 18 THE CHAIRMAN: Exactly.
 19 MS BLACKWELL: Of course, sir, you have now had the benefit
 20 of W80's own evidence, in which he agreed that the fifth
 21 sound appeared, as far as he could recollect, to be
 22 timed consistent with his discharge.
 23 THE CHAIRMAN: It becomes less of an experts' issue, than
 24 a factual issue based on the evidence of W80?
 25 MS BLACKWELL: Yes.

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1 2015 or were the practices, which you have advocated in
 2 your evidence today and in your reports, customary then?
 3 If you would like both to answer the first question,
 4 which relates to whether your criticisms are or might be
 5 said to amount to counsels of perfection --
 6 MR BROWN: Go on, first.
 7 MR STOREY: No you go.
 8 MR BROWN: From my point of view, yes, there is what you
 9 would consider to be a gold standard and it would be
 10 unreasonable to expect anything less than that, unless
 11 there was some significant indications that they
 12 couldn't be met.
 13 From my point of view, we are in the law enforcement
 14 community and, as such, the thresholds that are given to
 15 us to present in a criminal trial are such that they
 16 should be the minimum standard that we should be
 17 achieving and therefore if anyone fails to achieve those
 18 standards, then there is a failing in the system or in
 19 the ability of the particular person or unit to adhere
 20 to the standards that have been set down in relevant
 21 documentation.
 22 THE CHAIRMAN: Thank you.
 23 MR STOREY: Yes, sir, I think it is true to say that it
 24 should always be aspirational for operational officers
 25 in whatever field to deliver to the highest level,

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1 because that is actually what the public expects.
 2 However, if you do not have sufficient training, or
 3 do not engage in a regime of governance within a team or
 4 a force whereby APP, which is in effect national
 5 guidance, is not absorbed and then becomes policy, then
 6 it is very difficult to continually aim at the highest
 7 bar.
 8 Whilst my views that I have expressed and from my
 9 experience are because I have been in this game a long
 10 time, I would not expect somebody who doesn't do it on
 11 a regular basis or hasn't done it for a period of time,
 12 to actually have the same thought processes that I have
 13 when planning and managing a CMP.
 14 THE CHAIRMAN: Thank you.
 15 The last question, just to remind you, was do any of
 16 your criticisms reflect changes which have taken place
 17 since 2015 or were the practices which you have
 18 advocated in your reports and in your evidence customary
 19 at that time?
 20 MR BROWN: From my point of view, the training that
 21 I received in this discipline, the level of training and
 22 the expectations put upon myself during that training
 23 and then implemented operationally, is the same as what
 24 I have presented in my report, and that was way before
 25 the days of this operation.

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1 indeed.
 2 Thank you both, you are released.
 3 Are they released?
 4 MS BLACKWELL: No, not yet. We need them for the closed
 5 session. Very much not released.
 6 Thank you.
 7 THE CHAIRMAN: We will resume at 12.55. Thank you.
 8 (12.43 pm)
 9 (The Inquiry continued in closed session)
 10 (The Inquiry adjourned until 10.00 am on
 11 Monday, 26 July)
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1 THE CHAIRMAN: Thank you.
 2 MR STOREY: Obviously, sir, my training goes back some time
 3 before the incident.
 4 However, what I can say is that there has been
 5 a greater engagement between the community group that
 6 I chair and the College of Policing to try and deliver
 7 better and so people understand better the standards
 8 that are expected when actually when a CMP is run and
 9 being managed.
 10 THE CHAIRMAN: Thank you.
 11 Thank you very much.
 12 MS BLACKWELL: Yes, can we have a very short break, please.
 13 Sir --
 14 THE CHAIRMAN: I was just going to enquire, how long do you
 15 think that the closed session will take?
 16 MS BLACKWELL: At the moment I don't think it will be longer
 17 than 10 minutes, so we should comfortably be able to
 18 finish before lunch.
 19 THE CHAIRMAN: Shall we resume at 12.55?
 20 MS BLACKWELL: Thank you.
 21 I should also make clear that by "closed session",
 22 I of course mean that the family will be following the
 23 evidence that is called, it is only in terms of the
 24 public gallery being cleared.
 25 THE CHAIRMAN: Yes, I understand. Thank you very much

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 6 MR MARK BROWN (sworn)1
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