

1 Monday, 20 November 2017

2

3 I N D E X

4

5 Opening remarks1

6 Submissions on behalf of the2

7 non-state, non-police core

8 participants by MS KAUFMANN

9 (2.32 pm)

10 Opening remarks

11 THE CHAIR: Mr Barr.

12 MR BARR: Sir, it might help if I just introduce a slightly

13 different cast of advocates.

14 THE CHAIR: Yes.

15 MR BARR: They are largely the same as this morning.

16 Changes are that Ms Sikand, who waited patiently all

17 morning, is representing Mr Francis on this issue.

18 Mr Brandon has now supplemented the Slater & Gordon

19 team, leading Ms Woods, and Ms Mannion will be here with

20 Mr Payter this afternoon for the Metropolitan Police,

21 but we are expecting Mr Hall tomorrow.

22 THE CHAIR: Yes. I know that Mr Hall has other commitments

23 today and I think we have told him that we will not ask

24 for substantive submissions from Ms Mannion, save in an

25 emergency.

MR BARR: As I understand it, the National Police Chiefs'

Page 1

1 Council, Sir Robert Francis appeared only this morning

2 on the Rehabilitation of Offenders Act issue.

3 THE CHAIR: He's still here.

4 MR FRANCIS: I am listening with interest.

5 MR BARR: I don't myself wish to say very much other than to

6 say that the view of the Inquiry legal team having

7 considered the further authorities which have been cited

8 by the various core participants and having conducted

9 its own legal research to check for any developments in

10 the law since last year have concluded that there is no

11 reason for supposing that the ruling on legal principles

12 that was prepared last year by your predecessor, sir, is

13 anything other than entirely correct.

14 So it is our submission that the stage we have

15 reached is of applying those principles to the facts of

16 individual applications.

17 THE CHAIR: Thank you very much.

18 Ms Kaufmann?

19 Submissions on behalf of the non-state, non-police core

20 participants by MS KAUFMANN

21 MS KAUFMANN: Sir, we, too, do not for a moment want to

22 suggest there should be any departure from

23 Lord Justice Pitchford's ruling on the legal principles.

24 THE CHAIR: No.

25 MS KAUFMANN: But what we do, as I indicated to you earlier,

Page 2

1 want to do is to have an opportunity to look at what

2 those principles are and say something at a generic

3 level about the weight that falls to be given to

4 different interests favouring openness or favouring

5 restriction orders, and then to apply those.

6 THE CHAIR: I'm not going to prevent you making submissions

7 of whatever kind you think that you need to make. But

8 as you have seen in the statement that I made, the issue

9 of what should be done in the case of individual

10 officers is quite time-consuming. I did spend the

11 substantial part of three days hearing submissions in

12 relation to the three officers where I have held

13 a closed hearing and quite a lot of time thereafter

14 preparing open and closed decisions in consequence.

15 It took, in other words three or four days to do

16 those three cases.

17 Most of the ones we are now going to deal with

18 I don't think are of that order of magnitude. Even so,

19 there is quite a lot to do and I'm very, very anxious to

20 ensure that we do it rather than debate legal principles

21 and then leave a rush at the end to do the individual

22 officers. It would greatly assist me in any event if

23 you could make your general submissions in relation to

24 particular officers. I find it easier to grasp when

25 dealing with concrete facts than in the abstract.

Page 3

1 MS KAUFMANN: What I was proposing to do is to make the

2 general submissions and then in light of them apply them

3 to the individual particular officers, because once made

4 they will apply to every case and it will massively

5 speed up each time I look at an individual officer if

6 I have set out our stall at the beginning and you

7 understand how we submit the legal principles ruling

8 falls to be applied in the particular case as a matter

9 of generality.

10 If you would bear with me --

11 THE CHAIR: Yes.

12 MS KAUFMANN: -- I hope having done it that way you will see

13 that it actually makes more sense than to pick

14 a particular individual and look at his particular

15 circumstances, as opposed to:

16 "This is legal principles ruling, this is what we

17 draw from it, these are the implications for features

18 that turn in favour of openness, these are the

19 implications for features that turn in favour of

20 restriction. How does that apply to cover names, how

21 does that apply to real names?"

22 That will be, as it were, a framework that each

23 individual case can then be looked at?

24 THE CHAIR: If you are prepared to make your submissions on

25 that basis it is not, really, I think reasonable of me

Page 4

1 to ask you to change tack at such short notice and
 2 I will not do so.
 3 But I would ask you please to bear in mind the
 4 need -- imperative need -- to decide each individual
 5 case.
 6 MS KAUFMANN: I absolutely do. I will do all I can to make
 7 sure, and I have no doubt it will happen, that there is
 8 enough time to consider those individual cases.
 9 I don't intend to be hours on this at all --
 10 THE CHAIR: No.
 11 MS KAUFMANN: -- but it seems to me it is actually a more
 12 economical way of doing it --
 13 THE CHAIR: Okay.
 14 MS KAUFMANN: -- because it should be clearer and
 15 structurally more sensible.
 16 So, as I say, we do not seek to do anything other
 17 than apply the principles set out in
 18 Lord Justice Pitchford's ruling, but I'm going to ask
 19 that you briefly remind yourself of what those
 20 principles are. It is in volume 7 of the authorities
 21 for the restriction order hearing.
 22 THE CHAIR: Right.
 23 MS KAUFMANN: So it is the one volume that was prepared in
 24 addition to what was there in 2016.
 25 THE CHAIR: Yes, I have it.

Page 5

1 MS KAUFMANN: If you can first turn to paragraph 12, where
 2 Lord Justice Pitchford identifies at a very high level
 3 the obvious tension between two competing public
 4 interests that arise for consideration in this Inquiry.
 5 On the one hand:
 6 "The need to examine as publicly as possible
 7 evidence documents and information about undercover
 8 policing, a matter that has attracted widespread public
 9 concern."
 10 On one side of the equation there is the public
 11 interest that calls for openness.
 12 Second:
 13 "The need to keep secret evidence, documents and
 14 information about undercover policing whose disclosure
 15 may cause harm to the public or an individual."
 16 That is the starting point. If we then move to
 17 paragraph 68, if I can ask you, sir, to read paragraphs
 18 68 through to 70.
 19 THE CHAIR: Yes. (Pause)
 20 Yes.
 21 MS KAUFMANN: He identifies in 68 five factors that are
 22 served or five separate interests that are served by
 23 openness. Each interest is different but openness
 24 serves the pursuit of that interest in each case.
 25 Firstly, there is an instrumental value in openness

Page 6

1 which is something that you yourself have highlighted
 2 this morning. If you want to get to the truth, you need
 3 the witnesses to come forward who are going to help you
 4 to do so.
 5 THE CHAIR: Quite.
 6 MS KAUFMANN: But then there are other factors that aren't
 7 just about getting to the truth. Public examination of
 8 wrongdoing by police officers both for the sake of
 9 transparency in an important public service and for the
 10 purposes of identifying victims of wrongdoing, so that
 11 is entirely separate from the instrumental value and is
 12 something that is linked to principles of open justice
 13 and transparency.
 14 Public scrutiny of and consequential confidence in
 15 the proceedings of the Inquiry, very important that the
 16 public have confidence in the process of this Inquiry
 17 and as Lord Justice Pitchford said, it must have
 18 confidence in the process of the Inquiry as well as in
 19 the outcome of the Inquiry. Very important factors that
 20 tell in favour of openness.
 21 Fairness towards non-police witnesses. That is
 22 separate from the instrumental value that disclosure to
 23 them can play in the Inquiry process and its task of
 24 getting to the truth.
 25 THE CHAIR: It is all the same coin; it is merely

Page 7

1 a different face of it.
 2 MS KAUFMANN: Well, it isn't all the same coin. It isn't
 3 all the same coin. These are different public
 4 interests --
 5 THE CHAIR: No, no, 1 and 4. I'm not talking about all of
 6 these, but 1 and 4 run together.
 7 MS KAUFMANN: Well, fairness is about ensuring that because
 8 of the interest you have at stake, you have a proper
 9 participatory right in the process. Fairness serves the
 10 interest of getting to the truth, but it is a quite
 11 separate matter. So it does have an instrumental value,
 12 of course, and that is in part why principles of
 13 fairness have evolved in administrative law
 14 unquestionably, because it helps the judge or
 15 decision-maker to get to the right answer, but also it
 16 has a quality in and of itself by virtue of the interest
 17 that that individual has at stake. But unquestionably
 18 one serves the other.
 19 Then we have the gravity of the subject matter. In
 20 this case, as he identifies, the subject matter is grave
 21 indeed and that calls in and of itself for openness and
 22 accountability.
 23 69, we have the factors that tend in favour of
 24 restriction. At this stage, there is no weighing of
 25 these factors. He's simply identifying what they are.

Page 8

1 Grant of anonymity may encourage witnesses to come
 2 forward.
 3 That absolutely so in relation to core participants
 4 and that's one of the reasons that have been recognised.
 5 Grant of anonymity is not something that is going to
 6 necessarily encourage police officers to come forward --
 7 THE CHAIR: On the contrary. Those who are outwith the
 8 jurisdiction of the Inquiry, it may be the price that
 9 has to be paid for getting anything out of them.
 10 MS KAUFMANN: Well, we will have to see if they are outwith
 11 the jurisdiction that is they are themselves not
 12 undercover police officers.
 13 If they are undercover police officers --
 14 THE CHAIR: No, no, if they are outside the territory, if
 15 you like, of the United Kingdom.
 16 MS KAUFMANN: Outside the territory of the United Kingdom,
 17 yes.
 18 THE CHAIR: In which case anonymity may be the price that
 19 has to be paid to get anything out of them.
 20 MS KAUFMANN: Well, yes. We will -- again, one would have
 21 to see in the particular circumstances and then there
 22 would have to be a weighing of --
 23 THE CHAIR: I entirely agree. All I am doing is pointing
 24 out that it does not only apply to non-police witnesses.
 25 MS KAUFMANN: It can apply, yes.

Page 9

1 So protection of police officers from harm including
 2 physical and psychological harm and intrusion on family
 3 and private life and harassment. Non-police witnesses,
 4 their protection from psychological harm and intrusion
 5 into their private and family life, and prevention of
 6 knowledge of covert policing techniques, absolutely an
 7 interest favouring restriction and then confidentiality
 8 and the expectation of confidentiality.
 9 Then we have at 70 two factors that don't tell one
 10 way or the other.
 11 THE CHAIR: I think 71 doesn't help full stop.
 12 Constantly having to empty the court to go into
 13 closed session is not a sensible procedure. If there
 14 are to be closed sessions, and I have held three and
 15 I believe there will be a need for others, they will
 16 have to be done separately.
 17 MS KAUFMANN: Yes, but there are ways to work around that.
 18 THE CHAIR: Yes.
 19 MS KAUFMANN: Can we then move on to paragraph 82 through to
 20 89.
 21 If you will just read paragraph 82 and then 87
 22 through to 89, where we can see that in the Kennedy case
 23 Lord Toulson considered the application of the open
 24 justice principle in relation to quasi judicial
 25 inquiries such as this.

Page 10

1 THE CHAIR: Yes.
 2 MS KAUFMANN: At 90 to 91, we can see Lord Justice Pitchford
 3 addressing the subjects of public concern that arise in
 4 relation to this inquiry. Those matters of public
 5 concern it is the task of this Inquiry to examine.
 6 THE CHAIR: Yes.
 7 MS KAUFMANN: If you, sir, would just briefly look at 90, 91
 8 and then the conclusion at 93.
 9 THE CHAIR: Certainly.
 10 Yes, I have re-read that. I have obviously read the
 11 whole of this, more than once before.
 12 MS KAUFMANN: Exactly. I apologise for taking you to it
 13 again --
 14 THE CHAIR: Not at all.
 15 MS KAUFMANN: -- but I'm going to make my submissions in the
 16 face of it so I think it is important you have in mind
 17 exactly what I'm going to be referring to.
 18 If one then looks at paragraph 100 --
 19 THE CHAIR: Can I just make one observation in relation to
 20 paragraph 93?
 21 MS KAUFMANN: Yes.
 22 THE CHAIR: That paragraph, I think, was drafted to deal
 23 with the submission that was made on behalf of the
 24 police that the Inquiry could get to the truth just as
 25 well by conducting essentially everything in closed

Page 11

1 proceedings. He was saying, "No, it can't".
 2 MS KAUFMANN: Yes.
 3 THE CHAIR: I obviously agree with his view.
 4 MS KAUFMANN: Yes. And that's clear, your indications that
 5 you will release cover names, save where there is
 6 an issue of risk to life and limb, is obviously moving
 7 on from that and a departure from that.
 8 THE CHAIR: Yes.
 9 MS KAUFMANN: It nonetheless remains a very important
 10 observation when one looks at disclosure of real names,
 11 which we will come on to, that public confidence in the
 12 Inquiry is an incredibly important value that must be
 13 realised in the course of this Inquiry and in its
 14 outcome.
 15 At 100, he deals with wrongdoing and whether or not
 16 a restriction order can cover wrongdoing on the part of
 17 police officers. He concludes there is unlikely to be
 18 any public interest in the concealment of wrongdoing.
 19 And that is an extremely important consideration. But
 20 he does, and there are caveats there, and they are set
 21 out in the remainder of 100, which I would ask you to
 22 look at.
 23 THE CHAIR: Yes.
 24 MS KAUFMANN: 103 to 104, he deals with the fact that the
 25 chair will see the evidence -- you will see the

Page 12

<p>1 evidence -- and in contrast to judicial proceedings 2 where pre-closed material proceedings, such material 3 would have been withheld, that doesn't lower the 4 threshold for the imposition of a restriction order. 5 At 105, he deals with the fact that there is going 6 to be a lot of conflicting evidence, and makes the point 7 that you yourself have made today: 8 "Where necessary for the fulfilment of the terms of 9 reference the process of this Inquiry should inability 10 the Inquiry adequately to test the conflicting evidence 11 it receives." 12 So again that has two implications. 13 Firstly, those who have conflicting evidence to 14 give, must know they have conflicting evidence to give, 15 hence disclosure at the very least of the cover names. 16 Secondly, they must be given the opportunity to put 17 that evidence into the mix and have it properly tested. 18 107 to 109, he deals here with the importance of 19 fairness and the important role of the non-state core 20 participants in relation to the key issues with which 21 this Inquiry is concerned. 22 Then if you, sir, would just flick through right to 23 the end of 112, all of which is concerned with 24 addressing the strong public interest in openness. 25 THE CHAIR: Yes.</p> <p style="text-align: center;">Page 13</p>	<p>1 that is what the Inquiry will do with the imposition of 2 restriction orders and so forth. 3 So there is no need for a separate inquiry in 4 relation to Neither Confirm Nor Deny. 5 THE CHAIR: The way in which the Neither Confirm Nor Deny 6 policy has, as I understand it, been deployed in civil 7 litigation, simply has no part to play in this Inquiry. 8 MS KAUFMANN: Exactly. I am grateful. 9 THE CHAIR: Forgive me, just so my words are not 10 misunderstood. I can conceive of circumstances, in 11 particular in relation to recent, still more in relation 12 to current deployments, that the Neither Confirm Nor 13 Deny policy might have a part to placement. It is 14 actually rather more likely that nothing at all will be 15 said in public about, let's say, a current deployment 16 and that it will be neither confirmed nor denied that it 17 is being undertaken. 18 MS KAUFMANN: Yes, but we are looking here at historical 19 deployments. 20 THE CHAIR: Looking at history, in particular at the Special 21 Demonstration Squad, I simply cannot see any -- 22 MS KAUFMANN: Yes. 23 THE CHAIR: -- at all. 24 MS KAUFMANN: If we can then just move to part 6 of his 25 ruling where he sets out his conclusions and summary of</p> <p style="text-align: center;">Page 15</p>
<p>1 MS KAUFMANN: So that deals with openness. 2 Then, moving on, one of the major issues in this 3 hearing before Lord Justice Pitchford was the role of 4 Neither Confirm Nor Deny, the Metropolitan Police 5 Service policy of Neither Confirm Nor Deny. 6 THE CHAIR: Neither Confirm Nor Deny, I know he conducted 7 a thorough analysis of Neither Confirm Nor Deny and 8 concluded that it might have some weight in some 9 instances. 10 But the reality is that Neither Confirm Nor Deny has 11 no part at all to play in Special Demonstration Squad 12 deployments, where they are to be dealt with publicly 13 they are confirmed, where they are to be dealt with 14 entirely in closed, and there will be some, they will 15 not be confirmed. Neither Confirm Nor Deny in those 16 circumstances is a pointless exercise. 17 MS KAUFMANN: At paragraph 146, Lord Justice Pitchford for 18 different reasons effectively comes down to the same 19 conclusion -- 20 THE CHAIR: Yes. 21 MS KAUFMANN: -- that what Neither Confirm Nor Deny protects 22 can properly be protected by giving weight to, for 23 example, assessments of risk to the particular officer. 24 So officers must be protected from a risk to their life 25 or limb, that is what Neither Confirm Nor Deny does,</p> <p style="text-align: center;">Page 14</p>	<p>1 the findings, A.2 -- that's at page 78 of 85 -- 2 THE CHAIR: Yes. 3 MS KAUFMANN: -- sets out the two key principal competing 4 public interest factors that we have already identified 5 at paragraph 12 -- 6 THE CHAIR: Yes. 7 MS KAUFMANN: -- and that we know in relation to A.2(1) 8 translate into all sorts of other sub public interest 9 that openness serves. 10 At A.3: 11 "The principal means available to the Inquiry to 12 allay public concern in its subject matter, process, 13 impartiality and fairness is public accessibility to its 14 proceedings that will in one or more of the following 15 respects ..." 16 And then he sets out what functions openness will 17 serve. Then he identifies at 4 the main risk factors 18 for harm to the police. 19 THE CHAIR: Yes. 20 MS KAUFMANN: And that is damage to effective policing of 21 the true identity of present or former uncover police 22 officers, whether directly or indirectly, and to the 23 operational techniques. 24 If we then move down to A.9: 25 "The practical consequences of a restriction order</p> <p style="text-align: center;">Page 16</p>

1 to the fairness of the Inquiry's proceedings and the
2 Inquiry's ability to fulfil its terms of reference will
3 be significant considerations. When all other
4 components of the public interest are directly opposed
5 and evenly weighted the Inquiry's duty of fairness to
6 its participants may be a decisive factor."
7 Then if we turn to C.2.
8 THE CHAIR: I thought you were going to refer me to A.11?
9 MS KAUFMANN: Did I mention A.11?
10 THE CHAIR: I don't think so.
11 MS KAUFMANN: No.
12 Yes:
13 "... unless it is necessary in the countervailing
14 public interest of the protection of individuals from
15 harm and/or effective policing."
16 So it has to be -- it is a necessity threshold
17 because there are compelling interests in favour of
18 openness that he has identified. So they have to be
19 outweighed by nothing short of a necessity threshold.
20 If you could then look at C.2, the factors to be
21 taken into account when personal applications are made.
22 One of the factors there at 7 is the public interest in
23 openness, and then a fair balance to be struck between
24 the public interest and disclosure and the personal
25 interests of the applicant at 8.

Page 17

1 Part of the reason for going through all of that is
2 because Mr Sanders on behalf of a number of the officers
3 seeks to sideline the importance of openness in relation
4 to Lord Justice Pitchford's judgment.
5 THE CHAIR: He's made written submissions at least and may
6 expand upon them orally, I suppose, which were in effect
7 already dealt with in Lord Justice Pitchford's ruling.
8 MS KAUFMANN: Yes.
9 THE CHAIR: That was one of the things I did not propose to
10 revisit.
11 MS KAUFMANN: Exactly. He completely fails to recognise
12 that Lord Justice Pitchford has put to the fore and
13 entirely on one side of the balance openness. And on
14 the other side the various factors that will tell
15 against openness and which will only defeat openness on
16 the grounds of necessity.
17 So I want to just look at some of those factors
18 then. But before I do, your indication this morning is
19 very welcome in relation to cover names. Obviously we
20 don't argue with your view as to why disclosure of cover
21 names is something that is central --
22 THE CHAIR: I have indicated that I am minded to put it into
23 practice in three very difficult cases. Those that
24 I conducted closed hearings about.
25 MS KAUFMANN: I'm not going to dwell on cover names, but

Page 18

1 I am then going to look at real names. My submissions
2 on real names are obviously important because a lot of
3 the individual cases that we are now concerned with are
4 ones where you have made a decision to disclose the
5 cover name but the not the real name.
6 THE CHAIR: You are absolutely right. I am minded to make
7 a number of decisions of that nature and I invite your
8 submissions upon them.
9 MS KAUFMANN: Yes. So I'm going to deal at a general level
10 with: why real names? Why the disclosure of real names
11 serves an instrumental purpose in terms of the Inquiry
12 getting to the truth.
13 Those reasons are set out and identified in
14 paragraph 108 of our written submissions. I am just
15 going to go through them briefly. Our written
16 submissions are in the submissions bundle at tab 8 and
17 108 is at page 44.
18 THE CHAIR: Yes.
19 MS KAUFMANN: Firstly, the effectiveness of the Inquiry. So
20 this again, this ties in with why it is necessary to
21 disclose cover names.
22 Sorry --
23 THE CHAIR: Give me --
24 MS KAUFMANN: This ties in with why it is necessary to
25 disclose cover names.

Page 19

1 Where, for example, a cover name is not known --
2 THE CHAIR: Yes. Sorry, I think you are talking about real
3 names, aren't you?
4 MS KAUFMANN: Yes, I'm talking about real names, but this
5 first submission I am going to make ties in with why it
6 is necessary to disclose cover names. In there are
7 circumstances where in order to get to the truth it will
8 be necessary to disclose a real name. Take for example
9 where a cover name is no longer known. Then unless the
10 real name is disclosed it will be impossible to get to
11 the truth.
12 There is one possible alternative, for example in
13 relation to very old cases, which would be the
14 disclosure of photographs of the individual officer at
15 the time or around the time of his deployment. That
16 would be one alternative mechanism. But there has to be
17 some way in relation to cases where the cover name is
18 not known for that officer's identity as an undercover
19 officer to be --
20 THE CHAIR: I'm going to interrupt here. I apologise for
21 doing so, but not very much. I'm dealing here with
22 restriction orders in respect of identity. The decision
23 in 294 is not to disclose the real name. That is the
24 decision which you are seeking to persuade me I should
25 change when I come to making the final decision.

Page 20

1 I'm not deciding whether or not the Inquiry should
 2 attempt to obtain photographs of 294 at the time of the
 3 deployment of 294 or from whatever source it might be.
 4 In due course, if it is suggested that the Inquiry
 5 should take steps to obtain photographs of 294, I would,
 6 I think, need to be addressed on the powers that I have
 7 to do that. For the moment, I'm rather sceptical about
 8 whether or not I have the power to call upon anybody,
 9 certainly not a member of a family, to produce
 10 photographs to the Inquiry.
 11 MS KAUFMANN: If you don't have the power, then that makes
 12 it all the more important that the real name is
 13 revealed. Because then the real name becomes the only
 14 mechanism by which it is possible to tie in that
 15 individual to his or her earlier undercover activities.
 16 THE CHAIR: But you won't anyway.
 17 MS KAUFMANN: Well, that is not clear. That is not clear.
 18 It is not clear whether as a result of releasing the
 19 real names it won't be possible to trace that individual
 20 and trace that individual back to their activities.
 21 That is absolutely not clear.
 22 But the critical point is in respect of such
 23 an individual, unless as with the reasons leading you to
 24 say cover names must be disclosed, unless something is
 25 disclosed that enables that individual to be identified

Page 21

1 as an undercover officer, it will not be possible to get
 2 to the truth. So we have to tackle it.
 3 And if there is no risk to that officer at all, or
 4 if that officer is deceased and there is necessarily no
 5 risk, then there cannot be any justification for not
 6 doing that which is necessary to get to the truth.
 7 THE CHAIR: Again, 294 is deceased and the deployment was
 8 a very long time ago.
 9 MS KAUFMANN: That is absolutely right. But we are looking
 10 at deployments that arose in the Special Demonstration
 11 Squad later in time, where we know there was -- whether
 12 individual practices or we believe a strong culture --
 13 of misconduct involving sexual relations, intimate
 14 sexual relations with individuals.
 15 Now what is important is to understand how that
 16 culture arose. When did it start? And those cases that
 17 arose a very, very long time ago are of no less interest
 18 to this Inquiry in trying to understand how this
 19 situation came about than the more recent cases. And he
 20 is deceased, he is not at risk, but unless and until we
 21 know who he is, it is impossible to know whether or not
 22 he or any other officers who were undercover at that
 23 time, were engaging in similar practices.
 24 Another matter we know, for example, is that we know
 25 from Peter Francis that all the officers who started

Page 22

1 undercover as undercover officers, that that pool of
 2 officers was the sole pool from which management within
 3 the Special Demonstration Squad derived.
 4 THE CHAIR: That may have been true at a particular moment
 5 in time, it was not true throughout.
 6 MS KAUFMANN: But whether it was true throughout or not, it
 7 is clearly a significant feature of the Special
 8 Demonstration Squad that it was true at some or other
 9 times.
 10 So insofar as individuals -- we don't know this
 11 because we have not been informed -- were under cover at
 12 one point as officers and later rose in the ranks and
 13 became managers, then it becomes all the more important
 14 that their activities are understood, because they feed
 15 into the culture and the management style that later
 16 became part of the later operations of the Special
 17 Demonstration Squad.
 18 But the critical point here is you accept cover
 19 names have to be disclosed in order for us to get to the
 20 truth. That is no less true of the older operations
 21 than it is of the more recent operations.
 22 THE CHAIR: I entirely agree. Where a cover name is known
 23 in relation to an operation whenever it occurred, it
 24 ought in principle to be disclosed. I wholly agree.
 25 MS KAUFMANN: So then, when the cover name is not known and

Page 23

1 therefore that is not the mechanism by which you can
 2 then get to the truth, the only other mechanism is the
 3 real name. And there is just as pressing a need to
 4 disclose the real name in those circumstances as there
 5 are in the circumstances where the cover name is to be
 6 disclosed. It is no different.
 7 The question then is what falls to be put into the
 8 balance on the other side. I will come to that, but my
 9 primary --
 10 THE CHAIR: Are we now perforce looking at an individual
 11 officer's case as I hoped we would, or are we going
 12 to --
 13 MS KAUFMANN: We are not. Because I'm going to set out in
 14 my submission what are the weights to be given to all
 15 the other factors.
 16 At the moment I want to address the instrumental
 17 reason as to why real names rather than cover names are
 18 or can be required for the --
 19 THE CHAIR: Firstly, where no cover name is known, the only
 20 means of finding out who the officer may have been is
 21 the real name?
 22 MS KAUFMANN: Exactly, exactly.
 23 Then we have whistle blowers, which is dealt with at
 24 paragraph 108 E, and the example given in relation to
 25 HN86.

Page 24

1 THE CHAIR: Yes, hang on a moment.
 2 Yes.
 3 MS KAUFMANN: Absolutely central to your investigation in
 4 relation to the infiltration of the Lawrence family and
 5 the justice groups that were operating there, as well as
 6 the justice groups more generally campaigning in respect
 7 of the death of their loved ones, is the issue of race.
 8 It is absolutely central.
 9 The Inquiry needs to get to the bottom of that. The
 10 Inquiry needs to get to the bottom of the attitudes of
 11 the particular officers that were involved. Whistle
 12 blowing is important in relation to that. It applies in
 13 its most obvious form in relation to those issues where
 14 race comes to the fore, but not only where race comes to
 15 the fore. Equally we are dealing with women, who
 16 because they are women, have been abused. So it applies
 17 equally in relation to men who have abusive attitudes or
 18 behaviours towards women, which could have continued in
 19 all manner of other roles in policing after they were in
 20 the Special Demonstration Squad, and again
 21 whistle-blowing is important in relation to them.
 22 THE CHAIR: Forgive me a moment. I readily accept that
 23 attitudes to race and to women are an important aspect
 24 of the Inquiry that I'm undertaking. What I don't at
 25 the moment understand is why publishing the real names

Page 25

1 of those who may have been the subject of
 2 whistle-blowing facilitates that.
 3 MS KAUFMANN: No, you are misunderstanding the position.
 4 THE CHAIR: I am.
 5 MS KAUFMANN: So we have officer X. Officer X was
 6 an undercover officer for however long. He finishes his
 7 deployment, he moves out of the Special Demonstration
 8 Squad, he goes into another role within the police force
 9 in his real name, because of course his cover name will
 10 never be used outside of his Special Demonstration Squad
 11 deployment.
 12 His operations and activities in his real name may
 13 provide instances of when he has behaved in a racist
 14 way, when he has behaved in an abusive way. Unless his
 15 real name is known, none of that will come to light.
 16 THE CHAIR: Forgive me, so this is a retrospective exercise
 17 that you look at what has happened on other occasions
 18 outside the Special Demonstration Squad to see whether
 19 or not during his or her time in the Special
 20 Demonstration Squad he or she displayed a racist
 21 attitude and, in the case of a man, an attitude which
 22 was disrespectful of women?
 23 MS KAUFMANN: Precisely that.
 24 What is likely to happen, sir, when the police
 25 officers give their evidence? Are they likely to come

Page 26

1 look and say yes, we did this, we misbehaved, we are
 2 racist? No, they are not.
 3 You are going to have to satisfy yourself on the
 4 basis of all the evidence that you hear as to whether or
 5 not you are dealing with an issue that is in part
 6 explained by racism on the part of officers or
 7 an abusive attitude towards women.
 8 Obviously evidence about how they conduct themselves
 9 elsewhere is going to have a bearing.
 10 If we were dealing with civil proceedings as opposed
 11 to criminal proceedings, then mere relevance would be
 12 sufficient for that material to come into your
 13 consideration and be admitted, and there is no reason
 14 why a different standard should apply here. If it is
 15 relevant then you should be able to take it into account
 16 and balance it amongst all the other evidence and
 17 considerations in the way you consider most appropriate.
 18 So, yes, it is plainly relevant, but it will only
 19 come to light if the real names are given.
 20 And we cannot gainsay whether or not an officer has
 21 engaged in wrongdoing, we are not in a position to do
 22 that. That is what this Inquiry is going to be looking
 23 into.
 24 THE CHAIR: I am beginning to wonder what effective purpose
 25 would be served by exploring the careers post Special

Page 27

1 Demonstration Squad of the 171 people who were part of
 2 it, to discover whether or not they conducted themselves
 3 inappropriately during that period with the Special
 4 Demonstration Squad.
 5 The expansion of the scope of the Inquiry is in
 6 principle enormous. Its achievability, I think,
 7 diminishes in proportion to the extent to which it has
 8 expanded.
 9 MS KAUFMANN: That is to assume that you will be in 171
 10 cases or however many there are looking at that --
 11 THE CHAIR: No, but you want the real names of all 171
 12 officers, full stop?
 13 MS KAUFMANN: So that if individuals have evidence to come
 14 forward with they can, but that is not to assume that
 15 you are going to be having 171 officers being subject to
 16 huge amounts of evidence about their conduct afterwards.
 17 First question: is it relevant? If there is
 18 evidence on the part of officers after their deployment
 19 that they have behaved in certain ways, it is relevant.
 20 You yourself were talking earlier about a pattern of
 21 behaviour disclosed by convictions. It is no different.
 22 It may disclose a pattern of behaviour, a disposition,
 23 a particular bias or bigotry.
 24 It is relevant. The next question is: is it going
 25 to be manageable for you to look at it? As I say, it is

Page 28

1 going to be very unlikely that if you release all 171
 2 names you are going to get 4,000 police officers coming
 3 along in relation to each officer saying in respect of
 4 that officer they did X, Y, Z, W and F, such that the
 5 Inquiry will expand in this way. But what is entirely
 6 possible is you will get some evidence that will be
 7 very, very helpful to you in your deliberations in
 8 trying to find out who is telling the truth about what
 9 the officers did or didn't do in their deployment.
 10 THE CHAIR: So the interest in favour of disclosing the real
 11 name here is the possibility that evidence about their
 12 post Special Demonstration Squad deployment might
 13 produce something which would inform the view of the
 14 Inquiry about what they did during their Special
 15 Demonstration Squad time?
 16 MS KAUFMANN: Exactly. That is no different to why
 17 disclosure of the cover names is necessary, because the
 18 disclosure of an officer's cover name may produce
 19 evidence that that officer engaged in inappropriate
 20 behaviour when he was undercover. We don't know whether
 21 all of the officers did.
 22 THE CHAIR: Hold on, think about it a moment. The
 23 disclosure of a cover name will indicate to a limited
 24 class of people that they were dealing with someone
 25 quite a long time ago who was operating under false

Page 29

1 covers. That may well prompt evidence from them. They
 2 are interested in the subject, they call about it and it
 3 is what the Inquiry is looking into. But it is quite
 4 a different order of magnitude to say in relation to the
 5 post Special Demonstration Squad careers of 171 officers
 6 that something might turn up which is informative about
 7 their time in the Special Demonstration Squad.
 8 Don't you see, the two weights are very different?
 9 MS KAUFMANN: With respect, I don't see the difference. The
 10 issues are issues for this Inquiry. They are
 11 identifiable, they are known. Therefore the question is
 12 going to be: has this officer either engaged under his
 13 undercover identity in wrongdoing, or, in addition --
 14 and in addition has he engaged in similar patterned
 15 behaviour thereafter?
 16 THE CHAIR: There is a difference in the two things. May
 17 I put it more simply than I have done so far.
 18 In one, the first, we are asking what did he or she
 19 do?
 20 In the second we are asking what did he or she do
 21 after belonging to the Special Demonstration Squad,
 22 which might tell us what their view was when they were
 23 doing what they did.
 24 The two are radically different things.
 25 MS KAUFMANN: Again, I question, why are they radically

Page 30

1 different? As human beings our propensities are pretty
 2 well fixed and if an officer was engaged in racist
 3 behaviour after his deployment the likelihood is -- or
 4 it would certainly be relevant evidence from which you
 5 would be entitled to infer that when witness core
 6 participant A is telling you that that officer behaved
 7 in a particular way during the course of their
 8 operations, that they were displaying similar racist
 9 behaviours.
 10 Or when you are trying to understand why certain
 11 decisions were taken and whether there was a racist
 12 motive, evidence of blatant racism later in their life
 13 is clearly going to have a bearing and be relevant to
 14 you when you are trying to understand why the deployment
 15 was settled upon or so forth.
 16 There will be many explanations that you will be
 17 presented with as to why particular things happened in
 18 relation to Lawrence or whatever, but critical for you
 19 is going to be was this done because of institutional or
 20 overt racism?
 21 And behaviour that displays racism, whether before
 22 or after, is plainly going to be of real significance in
 23 your understanding of the motives at the time.
 24 THE CHAIR: I can readily understand where somebody has
 25 decided that, let us say, a black justice campaign

Page 31

1 should be infiltrated. That person's motive is clearly
 2 going to come under close scrutiny and I can see that in
 3 relation to that person it may well arise that his or
 4 her later career needs to be examined.
 5 But I think those cases are lately to be
 6 self-identifying, because it is they who will have made
 7 the decisions. To require every one of officers, the
 8 great majority of whom will have had nothing to do with
 9 black justice campaigns or anything to do with
 10 circumstances which might give rise to a feeling that
 11 something had been done for a racial motive, to expose
 12 all of them in their real names is (a) not useful and
 13 (b) may well not be fair depending on the individual's
 14 circumstances.
 15 MS KAUFMANN: We will come on to fairness in a moment, but
 16 it is not, as I say, just in relation to racist
 17 policing. It is also in relation to attitudes to women,
 18 which is just as important, and we don't know at the
 19 moment how many police officers were involved when
 20 undercover in such intimate relationships, we simple
 21 don't know.
 22 THE CHAIR: I completely agree that the attitude of managers
 23 to the deployment of male officers in circumstances
 24 where they would come into contact with women and may
 25 form intimate relationships of a deceitful nature, that

Page 32

1 what they said and thought at the time is something that
 2 the Inquiry has to try to get to the bottom of. And
 3 there is some evidence about that already and there will
 4 be more, I do not doubt.
 5 But how is the deployment of let us say a manager
 6 into the ports division of SO12 going to assist anybody?
 7 Or into counter terrorism, SO13 as was. How is that
 8 going to assist anybody?
 9 MS KAUFMANN: What is going to assist is if a female officer
 10 who was working with that male officer in SO13
 11 experienced some similar abuse towards her. Or if
 12 a female member of the public experienced similar abuse
 13 from that particular male officer. That is what is
 14 going to enlighten us. We just do not know. But what
 15 I do submit is you are not likely to get an absolutely
 16 huge amount of material, but what you might get is
 17 relevant material which will assist.
 18 That is something to put in the balance as an
 19 instrumental reason favouring openness.
 20 THE CHAIR: So you don't anticipate a huge amount of
 21 material, but some which will be relevant?
 22 MS KAUFMANN: Yes. The very fact that you are liable to
 23 have material -- which may be relevant -- is itself
 24 a factor in favour of openness, an instrumental factor
 25 in favour of openness.

Page 33

1 That is whistle-blowing.
 2 Then we have career progression in and outside the
 3 force. This addresses the extent to which officers
 4 involved in wrongdoing progressed through the ranks.
 5 That is plainly a matter that is going to be of public
 6 interest.
 7 THE CHAIR: It may be, but what does it have to do with the
 8 terms of reference?
 9 MS KAUFMANN: Because -- well, one of points made by
 10 Mr Sanders is that this is outside the terms of
 11 reference, but in our submission that is not right
 12 because the terms of reference require you to, "Identify
 13 and assess the adequacy of the statutory policy and
 14 judicial regulation of undercover policing".
 15 If that or any of it was inadequate, that may be why
 16 it is that an individual officer manages to progress
 17 through the ranks despite the fact that they have
 18 engaged in serious misconduct whilst they have been an
 19 undercover officer.
 20 So it does, in our submission, fall within the terms
 21 of reference. It is important that you know about such
 22 rising through the ranks in order that you can address
 23 what needs to happen to make sure that that doesn't
 24 happen again in the future, whether that be by
 25 regulation, policy or what other ...

Page 34

1 THE CHAIR: Hold on, if what has gone on in the Special
 2 Demonstration Squad is wrong and people had not been
 3 disciplined for it or put at a disadvantage in their
 4 future career, that is something which I can identify in
 5 the report and one hopes if anyone pays any attention to
 6 what I say, if I do make a recommendation about it, some
 7 attention will be paid to it.
 8 How does it help me fulfil the terms of reference to
 9 look at the future careers of all these officers?
 10 MS KAUFMANN: No, as I have said, it is if you identify that
 11 not only did things go wrong, but that in addition to
 12 that, individuals then rose through the ranks of the
 13 police force. Then that is identifying a further
 14 feature of something that has gone wrong. Not only that
 15 this all happened in the first place, but that actually
 16 mechanisms were not in place to pick it up and to stop
 17 those progressions.
 18 That is plainly relevant to your terms of reference.
 19 THE CHAIR: I think everybody knows that what went on within
 20 the Special Demonstration Squad was not widely
 21 broadcast.
 22 Your assumption, I think, is based upon the premise
 23 that police career progression will be founded upon
 24 a detailed knowledge of what took place in an outfit
 25 that was not broadly known about.

Page 35

1 MS KAUFMANN: We are not just dealing with the Special
 2 Demonstration Squad. We are dealing with the National
 3 Public Order Intelligence Unit, we are dealing with the
 4 unit where despite the introduction of Regulation of
 5 Investigatory Powers Act, all the safeguards under
 6 Regulation of Investigatory Powers Act in place to
 7 ensure that human rights were respected, despite all of
 8 that, Mark Kennedy, we know, did what he did. Other
 9 officers have been identified who also, despite the
 10 application of Regulation of Investigatory Powers Act,
 11 did what they did. We are not just dealing with
 12 a situation in which the Special Demonstration Squad's
 13 activities are --
 14 THE CHAIR: They were not promoted, they left.
 15 MS KAUFMANN: What we don't know is what happened to other
 16 officers. It is as though we already know the full
 17 situation. We don't know the full situation. We don't
 18 know what is going to come out.
 19 THE CHAIR: I entirely agree, but this strikes me as being
 20 purely speculative, with respect, and unlikely to assist
 21 in getting to the truth about core matters.
 22 MS KAUFMANN: In our submission it is not speculative, it is
 23 a critical part of your Inquiry to understand why those
 24 mistakes did not work, if they did not work, such that
 25 officers were promoted and to make sure that that

Page 36

1 doesn't happen again in the future.
 2 Again, in relation to officers that leave the force
 3 and undertake new jobs and new roles and new activities
 4 including in relation to private investigating, what
 5 mechanisms were put in place to make sure that those
 6 officers did not use or disclose information that they
 7 had acquired when they were undercover police officers,
 8 abuse those positions using similar techniques to those
 9 they used when they were undercover. All those issues
 10 are ones that this Inquiry should be looking at.
 11 We know for example that Mark Kennedy when he left
 12 the police force went on and started doing some private
 13 investigation.
 14 What was he doing? What checks and balances were in
 15 place to stop him abusing all the confidential
 16 information he had and all the techniques he had in
 17 these new posts?
 18 Again, if you don't have the real names of officers,
 19 you don't know, because of course they will not be using
 20 their cover name once they move on. Then you are not
 21 going to be able to get to that information either.
 22 THE CHAIR: I'm not sure that is true in all cases, but
 23 never mind.
 24 I really am not inquiring into wrongdoing outside
 25 the Special Demonstration Squad, the National Public

Page 37

1 Order Intelligence Unit and any other police undercover
 2 activity.
 3 MS KAUFMANN: So those are the instrumental reasons for real
 4 names, but even if we don't look at the instrumental
 5 reasons for disclosing real names, then there are,
 6 nonetheless, very strong public interest factors
 7 weighing in favour of disclosing those real names.
 8 Irrespective of any instrumental value.
 9 The first point that I remind you of is
 10 paragraph 203 of the May 2017 ruling of
 11 Lord Justice Pitchford, which is in 142 of volume 7. He
 12 says:
 13 "I have the same dislike for a presumption that
 14 a real identity will not be disclosed in the absence of
 15 exceptional circumstances as I do for a presumption that
 16 a cover name will be disclosed in the absence of
 17 compelling circumstances to the contrary."
 18 So the starting point is there is no presumption
 19 that real names will not be disclosed. You have to, in
 20 the case of real names, conduct a proper balance.
 21 Now when it comes to that balance, one of the
 22 factors that one has to put into the equation are the
 23 article 10 rights of the media. What's in a real name?
 24 Well an awful lot is in a real name and an awful lot has
 25 been said about that by the courts as to what is in

Page 38

1 a real name, and I don't need to repeat that.
 2 Accountability. This is particularly strong, the
 3 need for accountability, in relation to any officer
 4 where there is already evidence of wrongdoing. For
 5 example HN58 and his managerial role in relation to the
 6 Lawrence inquiry.
 7 THE CHAIR: That is putting it at this stage a little high.
 8 He has managerial responsibility for important
 9 decisions, exactly what happened and whether or not what
 10 he did amounted to wrongdoing is a matter for later
 11 determination.
 12 MS KAUFMANN: So just because we are dealing with real
 13 names, we do not start by presuming that those real
 14 names will not be disclosed. There are still compelling
 15 interests that call for openness. So we have to weigh
 16 in the balance all the factor that fall to be considered
 17 against openness.
 18 The primary consideration put forward on behalf of
 19 the officers is the promise of confidentiality. Now in
 20 our submission, the promise of confidentiality is of
 21 very limited weight in the context of this Inquiry.
 22 THE CHAIR: If you are promised confidentiality before you
 23 undertake a dangerous assignment. It assumes very great
 24 weight. If you are promised confidentiality in relation
 25 to an assignment that creates no risk to you and you go

Page 39

1 on and misbehave, it has no weight. It all depends on
 2 the circumstances --
 3 MS KAUFMANN: It does. But in my submission there are some
 4 key circumstances that apply to all the officers in this
 5 case. That means the weight that falls to be attached
 6 to confidentiality is very low. Firstly --
 7 THE CHAIR: It all depends, you can't make absolute
 8 statements.
 9 MS KAUFMANN: Sir, I am going to make some absolute
 10 statements. You may disagree with them.
 11 THE CHAIR: I am so sorry, of course you can. I will not
 12 necessarily accept them is --
 13 MS KAUFMANN: You may well not accept them --
 14 THE CHAIR: I should have phrased it better.
 15 MS KAUFMANN: Firstly, none of the officers were guaranteed
 16 in absolute terms confidentiality, that is absolutely
 17 clear now. Some were not guaranteed confidentially at
 18 all, at most they can plead an implied promise of
 19 confidentiality but even in those circumstances it was
 20 qualified and it was qualified in ways made absolutely
 21 clear by the Cairo statement, the generic statement at
 22 tab 5, to the effect that they could never expect
 23 confidentiality where disclosure was required as
 24 a matter of law or judicial process.
 25 Now, I accept that those officers would not have

Page 40

1 expected that this would be the judicial process in
 2 which that disclosure would fall to be made. They would
 3 never have expected that. Because nobody would have
 4 ever expected this Inquiry to have to take place because
 5 of the evidence of wrongdoing which has emerged.
 6 But nonetheless that qualification extends to this
 7 process. They never expected confidentiality where the
 8 law required disclosure. Even for the circumstances of
 9 this case, therefore, one starts from the premise: do we
 10 require disclosure? Does the interest in openness
 11 require that we disclose?
 12 That's the starting point. If in fact disclosure is
 13 required in the course of these proceedings, then the
 14 promise of confidentiality is actually not in any sense
 15 frustrated. It is entirely respected.
 16 Second, the promise of confidentiality, like Neither
 17 Confirm Nor Deny, actually serves a particular purpose.
 18 It wasn't just given for no reason. It was given in
 19 order to assure the officers that they would be
 20 protected from any threats that they might face as
 21 a result of disclosure of their identities. But this
 22 Inquiry has the powers to do this just that, quite apart
 23 from respecting their confidentiality. As you have made
 24 clear, if there is a threat to the life or limb of an
 25 officer, you will not make disclosure. So the interest

Page 41

1 in maintaining their confidentiality will be served by
 2 that particular power that you have.
 3 And it will be served by whatever balance you decide
 4 to reach in respect of all the other factors that tell
 5 against disclosure. So actually there is nothing that
 6 the promise of confidentiality even if there was one
 7 adds that is not already catered for by your powers to
 8 take into account all the underlying countervailing
 9 interests against disclosure that the officers might put
 10 forward.
 11 So that is why we submit that there really is
 12 actually nothing that is of substance in respect of
 13 promises of confidentiality. So we submit it is
 14 profoundly wrong, as Mr Sanders suggests, to start from
 15 the position that a promise of confidentiality is of
 16 such strength and quality that nothing short of
 17 a serious allegation of wrongdoing can defeat it.
 18 That is completely the wrong starting point.
 19 Whether or not there has been wrongdoing is neither here
 20 nor there for the purposes of looking at the promise of
 21 confidentiality.
 22 Another issue that has been put forward as a reason
 23 not to disclose real names is the impact on recruitment
 24 and retention. Now this may apply in some cases or
 25 others, but this is a general submission in relation to

Page 42

1 that.
 2 Firstly, and perhaps most importantly, as
 3 Lord Justice Pitchford himself said, this case is wholly
 4 exceptional. If disclosure is made in this case, in
 5 this Inquiry, of officers' real names, any future
 6 officer or any future individual who is thinking about
 7 whether to become an undercover officer is not
 8 rationally going to conclude, "My identity is going to
 9 be blown, it is likely to be blown", because of any
 10 disclosures in this Inquiry.
 11 Because the whole purpose of this Inquiry is to
 12 identify what has gone wrong historically with
 13 undercover policing and make sure that that doesn't
 14 happen again.
 15 In other words, we are not looking in the future to
 16 the likelihood of anything like this taking place again.
 17 In fact if this Inquiry does the job it should do, then
 18 we can say with almost certainty, no, we are not going
 19 to be dealing with another public inquiry into
 20 undercover policing in the foreseeable future.
 21 So any officer or individual who is thinking of
 22 going into undercover policing will know that that
 23 standard promise of confidentiality, which will continue
 24 to be given subject to disclosure and judicial
 25 proceedings, is not going to be liable to lead to the

Page 43

1 disclosure of their identities.
 2 So in our submission, absent some very compelling
 3 evidence which we don't know about, having been
 4 presented to the Inquiry to show that in fact undercover
 5 police officers are drying up, the fact of disclosure in
 6 these proceedings is simply not going to have --
 7 THE CHAIR: I think it is asserted that that is happening.
 8 Just as I have seen it in other circumstances asserted
 9 that the frequent inquiries and disciplinary proceedings
 10 where firearms have been deployed by police officers has
 11 led to a shortage of volunteers for the firearms squad.
 12 MS KAUFMANN: An assertion is in our submission simply not
 13 good enough. You would need to have compelling evidence
 14 which would demonstrate not only a very significant drop
 15 off in numbers but also a connection between that drop
 16 off and this Inquiry and the risk of disclosure.
 17 THE CHAIR: The implication appears to be -- it is one which
 18 you may not entirely be happy with -- is that if there
 19 is such evidence and it is as a matter of proof or
 20 common sense tied to the fact of the Inquiry and the
 21 revelations occurring during it, then it rather becomes
 22 a factor in favour of confidentiality.
 23 MS KAUFMANN: I am sorry?
 24 THE CHAIR: If in fact there is evidence that the numbers of
 25 people volunteering for undercover work in police forces

Page 44

1 nationally is declining, and if it can be tied to the
 2 occurrence of this Inquiry, then contrary to what you
 3 suggest it rather appears as if the promise of
 4 confidentiality is important.
 5 MS KAUFMANN: That's why I said you will need evidence that
 6 demonstrates --
 7 THE CHAIR: If there is, and I warn you that there might be,
 8 then the conclusion which is implicit in your
 9 submissions is that promise of confidentiality begins to
 10 achieve a weight that it didn't have before.
 11 MS KAUFMANN: If that evidence is sound evidence that
 12 demonstrates both the drop off, so that they can't get
 13 sufficient officers to do undercover work, and that it
 14 is linked to fears of disclosure arising from this
 15 Inquiry, then rationally that is a factor that weighs in
 16 favour of confidentiality, yes.
 17 If ...
 18 THE CHAIR: Yes.
 19 MS KAUFMANN: But putting that aside, the two key interests
 20 that both confidentiality and Neither Confirm Nor Deny
 21 seek to protect, safety of the officers and damage to
 22 the use of undercover investigative techniques, are all
 23 ones that can be catered for by your ability to look at
 24 in the individual case a particular risk to a police
 25 officer, in the individual case, a particular risk in

Page 45

1 relation to the erosion of the utility of a technique
 2 from disclosure of a particular document or whatever.
 3 Those are all factors that you can look at
 4 irrespective of having to give any additional weight to
 5 either Neither Confirm Nor Deny or confidentiality.
 6 THE CHAIR: I have already told you that Neither Confirm Nor
 7 Deny is in the waste paper basket.
 8 Confidentiality, you are beginning to get it out of
 9 the waste paper basket and put it into a position where
 10 it acquires greater prominence. I wonder whether you
 11 really intend that. Clearly you can't do.
 12 But the promise of confidentiality is obviously
 13 conditional. Frankly it doesn't matter whether it is
 14 implied or expressed.
 15 I doubt -- and I have not heard Mr Sanders on this
 16 yet and I was rather hoping to avoid these generalised
 17 submissions, but if it comes to it, I doubt that the
 18 promise of confidentiality is ever going to play a major
 19 part, save in circumstances where it supports other
 20 considerations like the risk of safety or, possibly in
 21 the case of some now elderly people, the disturbance to
 22 their remaining years.
 23 But it all depends on the circumstances.
 24 MS KAUFMANN: I agree.
 25 Then other factors put forward to be weighed into

Page 46

1 the balance, before we get to the risk of physical harm,
 2 are factors such as embarrassment or reputational damage
 3 arising from being linked to undercover policing at
 4 a time when there is in some sections of the press and
 5 media a negative view being taken in relation to its
 6 historical operations.
 7 In our submission those factors where there is
 8 nothing more than that -- we are not talking about
 9 harassment, we are simply talking about a situation in
 10 which in some quarters an individual may be held in poor
 11 regard by virtue of the simple fact that they were an
 12 undercover police officer. In our submission those
 13 factors simply do not begin to weigh in the balance
 14 against the public interest factors.
 15 THE CHAIR: Why in principle can they not play a part?
 16 MS KAUFMANN: Because of the factors that tell in favour of
 17 openness, the strength of those factors.
 18 THE CHAIR: You are not say they can't, you are saying they
 19 don't in practice?
 20 MS KAUFMANN: We are saying given the interests at stake
 21 here, given the interests at stake that favour openness,
 22 all of which I took you to, and given the weight to be
 23 attached to those, a concern about being held in poor
 24 regard by sections of the media because you were or your
 25 husband was an undercover officer do not begin to defeat

Page 47

1 the public interest in individuals being named in the
 2 course of this Inquiry who were engaged as undercover
 3 police officers.
 4 Just as there will be some people who take the view
 5 that their activities are a cause for criticism, the
 6 very fact that they were an undercover police officer,
 7 there will be many, many people who will take the view
 8 that they are to be praised for the work they did. But
 9 the very simply fact of just being held in opprobrium by
 10 some groups is in our submission absolutely no basis
 11 upon which to defeat the public interest in the media
 12 being able to report as fully as possible, the public
 13 interest of the public having confidence that this
 14 process is being conducted as openly as is possible so
 15 that confidence can be had in its process and outcome.
 16 THE CHAIR: As I understand it, your submission is not that
 17 it is not a factor at all. But that it is one which in
 18 any case should be held to be of little weight?
 19 MS KAUFMANN: It is plainly a factor. It was identified as
 20 a factor. It rationally is a factor because it is part
 21 of the article 8 interests of those officers or their
 22 families of course. Yes, this is why I am making the
 23 submissions I am at a general level now, because this is
 24 something that applies to all the cases.
 25 Yes, it is our submission that it is not capable on

Page 48

1 its own of being a factor that could outweigh the
 2 general interest in openness.
 3 THE CHAIR: Right. That is a principled submission. It is
 4 not "it all depends on the circumstances"?
 5 MS KAUFMANN: No.
 6 THE CHAIR: It is a submission that factors such as
 7 embarrassment, a wish not to be disturbed, a wish to be
 8 left in peace, although factors cannot outweigh the
 9 factors that favour publication of the real name?
 10 MS KAUFMANN: Absolutely. And that if factors such as
 11 those, which at the moment it would appear from your
 12 minded to position, if factors such as those are capable
 13 of outweighing the public interest in openness, then in
 14 our submission it is very clear that you are operating
 15 contrary to what Lord Justice Pitchford identified at
 16 paragraph 203 of his May ruling.
 17 A presumption -- and a very, very strong in fact it
 18 would seem to us an almost unalterable presumption in
 19 favour of not disclosing real names. Those factors will
 20 always outweigh.
 21 We have a situation in which -- and we will come
 22 to it -- we have a deceased undercover police officer
 23 and we have a very, very low risk of any intrusion at
 24 all in relation to the wife and family and yet your view
 25 is real name not to be disclosed.

Page 49

1 THE CHAIR: May I defend myself? First, this is a minded to
 2 note. It is not, as you have seen by my indication of
 3 an alternative possibility in the case of HN58,
 4 a decision.
 5 I have indicated what on the material I have
 6 considered so far, not including your submissions, what
 7 I am minded to do -- not including your oral
 8 submissions, I have read your written ones of course.
 9 Secondly, to say that I have somehow arrived at
 10 a presumption that the real name will not be disclosed
 11 is not right. I have indicated in the statement that
 12 I made this morning that in the case of deployed
 13 undercover officers I expected that the application of
 14 Lord Justice Pitchford's principles would produce that
 15 outcome in most cases.
 16 But that is very different from saying I start from
 17 a presumption, I don't.
 18 MS KAUFMANN: I am glad to hear that from you, sir.
 19 But our position remains that, 1, there should be no
 20 presumption and, 2, there are certain balances that can
 21 be struck at the outset, and where the issue is one of
 22 interest on the part of the press or some criticism in
 23 the press, or by individuals on the internet, of the
 24 fact that somebody was an undercover police officer,
 25 that cannot, simply cannot, outweigh the interest in

Page 50

1 openness that arises from the seriousness of the issues
 2 that are to be explored in the course of this Inquiry,
 3 the interest in assuring the public have confidence in
 4 it. The interests of the press in being able to report
 5 meaningfully. There is important in a name and these
 6 sorts of factors simply are not capable of weighing
 7 contrary in the balance.
 8 Can we move up the scale then to situations where
 9 there is a concern about something more invasive, more
 10 intrusive? So, for example, that there may be serious
 11 expressions of opprobrium and allegations of wrongdoing
 12 being made against a particular officer, or a particular
 13 officer being confronted by individuals who feel angry
 14 in respect of allegations of misconduct that have
 15 arisen.
 16 Firstly, thus far the only people who have been in
 17 any way directly confronted have been individuals
 18 against whom serious allegations of wrongdoing are made.
 19 So where an individual simply was an undercover
 20 police officer but there are no allegations of serious
 21 wrongdoing. There is no evidence, that we know of, to
 22 show that those individuals have been the target of that
 23 kind of negative confrontation at all.
 24 So when it comes to assessing the likelihood of an
 25 individual being subject to that kind of behaviour, in

Page 51

1 our submission the right starting point is it's not
 2 going to happen unless that individual is somebody who
 3 once their cover name is revealed is going to have been
 4 identified as somebody who is alleged to have engaged in
 5 serious wrongdoing.
 6 If that is the case and there are allegations
 7 against that individual that they have engaged in
 8 serious wrongdoing, then in our submission there is
 9 nothing wrong with that person being confronted by their
 10 behaviour. There is something wrong with that person
 11 being subjected to violence, unquestionably. There is
 12 something wrong with somebody being subjected to any
 13 greater risk obviously, but for that person to be
 14 subjected to a confrontation with somebody who has been
 15 profoundly deceived and hurt and -- well, you have seen,
 16 you have read some of the accounts of the women. Things
 17 that have happened to them which have had the most
 18 profound consequences for decades in their life. For
 19 them to be confronted by that, why not?
 20 THE CHAIR: You can't, I think, have been listening.
 21 If something of that kind has occurred, I have
 22 acknowledged, I repeat, that those people have
 23 a compelling right to know the real name of the
 24 individual who has interacted with them. In that
 25 balance, the fact that that individual may, once his or

Page 52

1 her name has been disclosed, be exposed to unfavourable
 2 criticism or even a degree of confrontation will count
 3 for nothing.

4 MS KAUFMANN: I have not misunderstood you. I have well
 5 understood you, but I am now dealing with the question
 6 whether or not you require the disclosure of real names.
 7 One of the arguments against that is that people will be
 8 subjected to harassment. Officers are relying upon what
 9 happened to Mr Boyling, what happened to Mr Lambert.
 10 I am making two points here.

11 Firstly, what happened to Mr Boyling and Mr Lambert
 12 happened because of the alleged wrongdoing. So you
 13 cannot translate from what happened to them what will
 14 happen to an officer against whom there is no allegation
 15 of wrongdoing.

16 Point 1 --

17 THE CHAIR: Forgive me, you cannot reasonably extrapolate
 18 from those two instances that those are the only
 19 circumstances and the only risk that face an officer
 20 whose real name is disclosed.

21 MS KAUFMANN: I absolutely accept that. That falls then to
 22 be dealt with where there is evidence that they face
 23 more serious risks, and that is something that can be
 24 catered for. I am dealing with the situation where all
 25 an officer can come along and put forward -- as has

Page 53

1 happened with many of these officers -- is, "I am
 2 concerned that I am going to be harassed in the way that
 3 Jim Boyling was harassed and Bob Lambert were harassed".

4 If there were other reasons and there is other
 5 evidence to suggest that they face a particular risk,
 6 that is an entirely different matter.

7 My submissions now are: if what I'm saying is
 8 dependant on what happened to Bob Lambert and
 9 Jim Boyling, then those are not reasons not to disclose
 10 their real name. Because in the case of Bob Lambert and
 11 Jim Boyling these things happened because of the serious
 12 allegations of wrongdoing. Hence, if in fact the
 13 officers who want to be corrected were themselves
 14 engaged in wrongdoing and the disclosure of the cover
 15 name is going to bring that out, and the disclosure of
 16 their real name is going to mean that they can be
 17 confronted, then so be it for the reasons that you have
 18 already given.

19 If those officers are not subject to wrongdoing
 20 allegations, then nothing that happened to Bob Lambert
 21 and nothing that happened to Jim Boyling should give
 22 them and should give you concern that they will be
 23 treated in the same way. Because there is simply no
 24 evidence that that happens.

25 Individuals who have hurt and betrayed those upon

Page 54

1 whom they spied understandably have given rise to huge
 2 concern and a desire to find out the truth and confront.
 3 There is no evidence whatsoever that individuals who
 4 have not done wrong to others have been put into the
 5 same situation. So that's why we submit that reliance
 6 upon Bob Lambert and Jim Boyling's situation, again that
 7 sort of harassment should not be a reason to impose
 8 a restriction order. So that is another point of
 9 general principle that we make.

10 So what that really leaves is risk of physical harm
 11 and serious article 8 interference. Or I should say in
 12 relation to concerns that family members have about
 13 disclosure and the impact it will have upon them, we of
 14 course recognise that family members are caught up in
 15 this entirely innocently, but our submission again is as
 16 a matter of principle their understandable desire not to
 17 be caught up in and be caused upset by these allegations
 18 coming into the public domain is not a justification for
 19 a restriction order.

20 Take, for example, an officer who has been engaged
 21 in intimate sexual relations whilst undercover, who as
 22 a consequence has completely betrayed his partner in so
 23 doing, the disclosure of which is obviously going to
 24 give rise to very serious upset on the part of the
 25 partner, well, we understand that. The position is that

Page 55

1 that cannot override the public importance of those
 2 individuals being named.

3 As you will seen have in our submissions we do draw
 4 an analogy between what is going on recently in the
 5 public at large in relation to the Weinstein allegations
 6 and allegations that are coming out left, right and
 7 centre about sexual abuse by public figures. It is
 8 a cost of course to all their families but the public
 9 interest in these people being held to account overrides
 10 that and that is our position, again as a matter of
 11 general principle.

12 So then we come to the position in relation to cases
 13 where it is alleged that the individual will be at risk
 14 of physical harm or serious article 8 interference.

15 By that I mean that there will be a risk through
 16 disclosure of their real name of
 17 psychological/psychiatric harm.

18 Now where disclosure would put somebody's life or
 19 limb at risk and engage articles 2 and 3 of the
 20 Convention, where that is the case then it is accepted
 21 that would be a basis upon which a restriction order
 22 would properly be imposed of.

23 But precisely because of that, the cogency of the
 24 evidence is critical. The question of whether there are
 25 alternative means to protect the individual is also

Page 56

1 critical --

2 THE CHAIR: I was going to ask you what those might be.

3 MS KAUFMANN: What the alternative means might be?

4 THE CHAIR: Yes.

5 MS KAUFMANN: I think that is going to vary with the

6 circumstances. I'm not able myself necessarily to say.

7 The most extreme situation would be that somebody is

8 going to have to go into a witness protection programme.

9 Other less extreme situations may involve officers being

10 moved or so forth. But I mean unless one knows the

11 nature of the risk and the circumstances of the risk

12 then it is impossible to know how it can be managed.

13 But certainly those factors must be included.

14 But for our purposes, and we can't gainsay that, we

15 are never going to be told about that, but what we do

16 submit is that is something that has to be taken into

17 account. And --

18 THE CHAIR: How would such measures protect against serious

19 psychiatric harm?

20 MS KAUFMANN: No, I'm talking here about physical harm.

21 Psychiatric harm, that is an entirely different

22 matter and therefore again the question --

23 THE CHAIR: Are you saying that in relation to those

24 individuals and groups which did and may still do pose

25 a risk to the life and limb of an officer, that these

Page 57

1 measures should be taken in preference to keeping the

2 real and cover name of the officer secret?

3 MS KAUFMANN: What I submit is it ultimately has to be

4 a balance. As I say, I don't know what the measures

5 are. If the measures are as extreme as putting somebody

6 on a witness protection programme, then it would be open

7 to you to decide which way to go in relation to that.

8 That would depend upon how important that individual

9 officer is in relation to the Inquiry.

10 There are all sorts of factors to be taken into

11 account, but given that non-disclosure of cover name,

12 non-disclosure of real name means necessarily that

13 really it is going to be impossible to get to the bottom

14 of that officer's activities, because nobody can come

15 forward, then it has to be an in-the-round assessment by

16 you looking at how important that evidence is overall to

17 the matters that you have to look into and make findings

18 about.

19 Now it may be, for example, that at the beginning of

20 the Inquiry you are unable to say that that particular

21 officer's position was of central importance. It may be

22 things come out in the course of the Inquiry that lead

23 you to understand that actually this officer's role was

24 a lot more significant than I had understood, and at

25 that stage you might revisit where the balance lies. So

Page 58

1 you might at that stage --

2 THE CHAIR: Forgive me, it almost certainly would have

3 nothing to do with the significance of the role of the

4 officer. You appear to be getting close to submitting

5 that if the officer's role is significant then even in

6 cases in which there is a risk of life or limb, witness

7 protection measures should be taken in preference to

8 concealing the name of the officer.

9 MS KAUFMANN: No, what I have just submitted is at the start

10 of the Inquiry you may consider the balance clearly

11 comes down in favour of restriction order, but the

12 Inquiry may move down the substantive track and you come

13 to understand something about this officer's role which

14 makes you think, "We need to get to the truth of his

15 role and we can't do it unless there is disclosure". At

16 which stage you may decide to revisit the balance, at

17 that stage.

18 None of us can gainsay the circumstances, but it is

19 possible you might consider some way down the line,

20 "Actually, in relation to this officer, I think we

21 should look at alternative measures". They are very

22 extreme but the alternative is very extreme.

23 THE CHAIR: At the moment I'm only concerned with whether or

24 not to make restriction orders. That's what these

25 hearings are about.

Page 59

1 MS KAUFMANN: Yes.

2 THE CHAIR: Not what might happen later on under my powers

3 under section 20(4).

4 We have shorthand writers who have a hard task, and

5 I have been asked that if we are going to go beyond 4.00

6 they need a break.

7 Now if your general submissions are now about to be

8 concluded then I will rise now and go on to your

9 specific submissions tomorrow morning.

10 MS KAUFMANN: I have a little bit more, because I want to --

11 THE CHAIR: This is slightly what I feared.

12 MS KAUFMANN: I want to look into the process by which you

13 look at these critical questions of risk to self, either

14 by virtue of the individual psychiatric state or risk

15 arising from third parties and how you assess that,

16 given its central role in the way the Inquiry moves

17 forward. Because if restriction orders are imposed then

18 we know the material can't come out and I want to look

19 at disclosure.

20 I hear what you said this morning, and I hear your

21 plea that everybody step back as it were from seeking

22 more disclosure in relation to this exercise. I am

23 afraid I'm not going to do that. I'm going to be doing

24 quite the reverse and submitting that if you are going

25 to do this process fairly and in a way that gets the

Page 60

1 answer right, you need to do more by way of disclosure.
 2 And I would like the opportunity to make those
 3 submissions and make them good. And then we can get on
 4 to the individual cases, which aren't going to then take
 5 an inordinately long time because I have set out our
 6 stall in relation to those.
 7 THE CHAIR: You have had since about slightly after 2.30,
 8 I make no complaint about it your submissions are
 9 principled and interesting. But there are others who
 10 may have submissions to make and in particular they have
 11 different principles to expand. Very much what I feared
 12 would happen is happening. We are devoting an enormous
 13 amount of time and effort not to deciding individual
 14 restriction orders but to questions of grand principle.
 15 MS KAUFMANN: Well those principles inform the restriction
 16 orders. You have asked me what is your principal
 17 position. I have informed you what is our principal
 18 position in relation to a number of the factors that
 19 then fall to be put into the balance in the individual
 20 cases.
 21 THE CHAIR: You very helpfully tell me that. How much
 22 longer do you need?
 23 MS KAUFMANN: I need probably about another half an hour
 24 maximum.
 25 THE CHAIR: We will rise then for five minutes to enable the

Page 61

1 shorthand writer to have a break and we will continue
 2 until you finish.
 3 (4.06 pm)
 4 (A short break)
 5 (4.10 pm)
 6 THE CHAIR: Yes.
 7 Yes, Ms Kaufmann, I'm sorry, I was waiting for you
 8 to restart.
 9 MS KAUFMANN: I am sorry.
 10 THE CHAIR: No, no.
 11 MS KAUFMANN: I was coming to look at the two considerations
 12 of risk of harm from others or in relation to one's
 13 psychological state or the officer's own psychological
 14 state.
 15 That as these factors are ones which are capable of
 16 leading to a restriction order that is going to
 17 potentially involve non-disclosure of real and cover
 18 names. So real names in any case where there is no
 19 mosaic effect but real and cover names where you
 20 consider that even disclosure of the cover name will
 21 lead to the identification of the real name, then we are
 22 dealing with a situation where the potential outcome is
 23 that in respect of that particular officer's activities
 24 it will be impossible to really get to the truth,
 25 because of the necessity for a restriction order.

Page 62

1 These are the cases where the most anxious scrutiny
 2 is plainly going to be required and where the evidence
 3 therefore has to be at its most cogent and compelling,
 4 such that you can safely rely upon it to draw the
 5 conclusion which will have such a negative impact upon
 6 your ability to get to the truth.
 7 I just want to outline the concerns we have in
 8 relation to the evidence that we have had so far,
 9 because of course it may well be that we or our clients
 10 have a lot of useful things to say in relation to the
 11 risk assessments. What we want to ensure is that
 12 insofar as we do have useful things to say, we are given
 13 that opportunity whenever it is possible and appropriate
 14 to do so.
 15 Before I come on to that, I just want to say
 16 something about the generic risk assessments that you
 17 have been presented with. So, for example, you have
 18 been presented with an assessment in tab 1 of the
 19 generic materials. It is the risk assessment briefing
 20 note. If we turn to page 13 we can see that the groups
 21 at the first bullet point at paragraph 5.3, there is an
 22 identification of groups being obviously relevant and
 23 significant in assessing risk, because there is a far
 24 more physical and psychological risk in infiltrating
 25 certain extreme right wing or Irish groups more recently

Page 63

1 when compared with, say, the Socialist Workers Party,
 2 et cetera.
 3 At 8.3 and 8.4 there is again a reference to Irish
 4 groups.
 5 At 10.1 there is a reference to:
 6 "Despite the Special Demonstration Squad closing in
 7 2008, there remains a very real physical risk for
 8 officers who were deployed in a number of groups,
 9 including extreme left wing groups such as Red Action or
 10 Anti-Fascist Action ..."
 11 And then there are Irish groups and extreme right
 12 wing groups. We would just caution the Inquiry before
 13 it relies upon this sort of evidence without any
 14 foundation supporting these assertions of risk, because,
 15 for example, Mark Kennedy was involved in Anti-Fascist
 16 Action and his identity has been known about for some
 17 very, very considerable time and therefore there is
 18 material -- real material and real evidence -- that the
 19 Inquiry can get its hands on which can inform the risk
 20 assessment. That is officers who were involved in such
 21 groups and whose identity has been disclosed, and it is
 22 important that those steps are taken.
 23 Then, for example, a general statement "Irish
 24 groups". We don't know which groups they are, but we do
 25 know, for example, that Rick Gibson, for example, was

Page 64

1 involved in Troops Out, and we deal with that at
 2 paragraph 80 of our submissions. It is not a situation
 3 where again there is any clear evidence that there is
 4 any risk arising from a group such as Troops Out.
 5 So we would submit there has to be a great deal of
 6 care involved in relying upon these generalised risk
 7 assessments.
 8 Another reason to be very cautious about what is
 9 being said in terms of risk can be seen from the
 10 statements that we do have from, for example,
 11 Bob Lambert and Jim Boyling. Those are in the generic
 12 submissions at 19 and 20.
 13 I don't need to go to those, but these have been
 14 relied upon as showing that the officers were subjected
 15 to threats and so forth, whereas when one actually looks
 16 at the statements there is no evidence whatsoever that
 17 there were any physical threats posed to those
 18 particular officers, as opposed to a group of angry
 19 people in relation to Mr Lambert expressing their anger.
 20 In relation to Mr Boyling, you will have seen the
 21 statement that we provided to you which responds to the
 22 part of his statement at tab 20 --
 23 THE CHAIR: Has that statement now been redacted, if
 24 necessary --
 25 MS KAUFMANN: No, it hasn't.

Page 65

1 THE CHAIR: -- for general distribution?
 2 MS KAUFMANN: No, it hasn't. So I'm not going to refer to
 3 its contents at this stage. It will be redacted
 4 afterwards, but I know that you have had an opportunity
 5 to read it.
 6 THE CHAIR: Yes, I have.
 7 MS KAUFMANN: And you will see a very, very different
 8 account given of the meeting that is described by
 9 Jim Boyling. It is just an instance of where specific
 10 allegations that are relied upon to inform a risk
 11 assessment, if left alone, can disclose a very distorted
 12 picture and the importance of your having an opportunity
 13 to understand a fuller picture and come to a more
 14 informed view as to what the circumstances were that are
 15 said to give rise to the particular risk.
 16 THE CHAIR: It will come as no surprise, I hope, to you,
 17 that even though beforehand I had only read the
 18 statement of Boyling, I was not impressed that he or
 19 anyone in a similar situation to him faced anything that
 20 was objectionable from Mr Healey(?), whose name I think
 21 is in the public domain anyway, so that's why I have
 22 mentioned it.
 23 Although I welcome the statement which I have seen,
 24 it doesn't in any way alter the decisions that I have
 25 made or am minded to make about other people.

Page 66

1 MS KAUFMANN: Yes. It was an instance of where something
 2 was said that we were able to respond to.
 3 THE CHAIR: Certainly.
 4 MS KAUFMANN: It was a disclosure that enabled us to put
 5 a different side of the picture and we simply served it
 6 to illustrate how important that can be.
 7 THE CHAIR: I readily understand it. Having read the
 8 statement, I have found it of interest and I have no
 9 reason to disbelieve its contents. But this is to
 10 elevate a small example in relation to a case that I'm
 11 not actually considering, because the name of the man is
 12 in the public domain already, into a general proposition
 13 that may not be entirely justified.
 14 MS KAUFMANN: Sir, you will understand that we have no
 15 idea --
 16 THE CHAIR: Of course.
 17 MS KAUFMANN: -- because we have thus far had no disclosure
 18 which lets us know, for example, in relation to officers
 19 that you are currently considering in the current batch
 20 what groups they infiltrated and therefore whether we do
 21 have something we might say in relation to the risk
 22 assessment. We simply don't know. There may be
 23 officers who are infiltrating groups who have absolutely
 24 nothing to do with my clients, but we don't know that so
 25 all we can do, as it were, is feel around in the dark

Page 67

1 and try and hit the right target.
 2 THE CHAIR: I understand that. That would be thoroughly
 3 unsatisfactory were we in the substantive phase. At
 4 this stage of the Inquiry it may simply be that it is
 5 not possible to do a Rolls Royce job because we have to
 6 operate on the basis of what can be produced to me for
 7 me to consider, rather than on the basis of a full
 8 investigation into all the facts. That is the job of
 9 the substantive part of the Inquiry.
 10 MS KAUFMANN: Process feeds into substance, sir. If you get
 11 it wrong and you impose restriction orders which prevent
 12 us and you from getting to the truth, then that will
 13 have a very damaging effect upon the substantive part of
 14 the Inquiry. And that is why --
 15 THE CHAIR: Sorry, I agree wholeheartedly with that. You,
 16 I think, acknowledge that I will have seen in relation
 17 to individuals far more than you can possibly know or be
 18 told at this stage in the proceedings.
 19 I have to ask for a degree of trust about decisions
 20 of a kind that I cannot fully reveal the reasons for.
 21 Secondly, a point I have made already and I'm bound
 22 to repeat it, I repeat it now, if this Inquiry is to
 23 make progress so as to be able to report in a reasonable
 24 time then pragmatic decisions have to be made.
 25 MS KAUFMANN: Yes. I do appreciate that.

Page 68

1 Sir, you will appreciate that so far as a degree of
 2 trust is concerned, that is something that is going to
 3 be very difficult to simply ask for from my client base,
 4 because they, I am afraid, have been so deceived already
 5 by the state, as they see it, that it is simply
 6 unrealistic to ask them to trust and --
 7 THE CHAIR: Forgive me. I understand that. And I know
 8 perfectly well that I have to earn of trust of as many
 9 people as I can that I will conduct this Inquiry
 10 thoroughly and fairly. I can only, in the end,
 11 demonstrate that by decisions and eventually the report.
 12 I can't satisfy everybody all of the time, I am
 13 fully aware of that.
 14 MS KAUFMANN: Insofar as any of your decisions about
 15 restriction orders concern allegations of risk arising
 16 from the conduct of any of my clients -- past conduct
 17 and the future risk that they pose -- and insofar as
 18 disclosure about any aspects or features of their past
 19 conduct are being relied upon as giving rise to a future
 20 risk, and insofar as disclosure of those is not going to
 21 lead to the identification of the particular officer,
 22 then to earn their trust but also to deal with this
 23 fairly you need to disclose as much as possible of that
 24 material. So that, just as we were able to in the case
 25 of Mr Healey, they can make representations about it and

Page 69

1 they can say and explain or contradict the allegations
 2 that are being made.
 3 We don't know, because we haven't been told, what
 4 groups these individual officers infiltrated, but if
 5 they did infiltrate our groups and if disclosure is not
 6 going to jeopardise the officers, then they should be
 7 told. We do not accept for a moment that in every case
 8 disclosure of the group that was infiltrated and that
 9 poses a future risk or disclosure of any particular
 10 allegations upon which you are being invited to make
 11 that assessment of risk are based is going to
 12 automatically lead to the identification of a particular
 13 officer.
 14 THE CHAIR: I can do that in way which I think your
 15 non-state core participants would find profoundly
 16 unattractive and I think would be probably wrong in
 17 principle, which is to say simply, "We are interested in
 18 these groups ..." I think you know the numbers but not
 19 perhaps all of the identities of all of the groups, I'm
 20 not entirely sure what has been made public but we could
 21 make public a list of all of those groups or at any rate
 22 the great majority of groups and say:
 23 "Please, let me know anything about the activities
 24 of those groups, past and current, and whether they pose
 25 or might pose a risk to anybody who had infiltrated

Page 70

1 them."
 2 I might be inundated by a whole lot of material,
 3 I suspect I would not be, but I might be, and I would be
 4 asking people to speak blind. I'm not minded to do
 5 that. I think they need to be told what the Inquiry
 6 needs to hear from them before inviting them to make
 7 general statements to the Inquiry.
 8 MS KAUFMANN: We are confusing substance with process again.
 9 At this stage if you have information which is
 10 relevant to your risk assessment, relevant to your
 11 decision about whether you are going to shut down this
 12 aspect of the Inquiry because you will protect the
 13 identity of the officer, a critical decision -- one of
 14 process but one which will affect substance and outcome.
 15 If you are going to do that, on the basis of evidence of
 16 risk that our clients can answer to, if given an
 17 opportunity, then unless to give them that opportunity
 18 will put at risk the officer who is seeking protection,
 19 that is it will disclose the identity and defeat the
 20 purpose of the application for a restriction order, then
 21 you should do it. In fairness to them but also in
 22 furtherance of the interests of this Inquiry, whose
 23 interests are served by you getting to the truth and not
 24 by you shutting down an avenue towards the truth by
 25 imposing a restriction order when the evidence does not

Page 71

1 justify it.
 2 So I understand your concerns, you have come into
 3 this already way down the line but actually this aspect
 4 of the process is one of the most important. Because it
 5 is at this stage that we know what evidence you are
 6 going to be able to hear to get to the truth later. So
 7 I do insist that we need far more material if it is
 8 disclosable to us than we have had to date.
 9 Also, when it comes to the psychological condition
 10 of a particular officer, we do not accept that we can be
 11 told absolutely nothing whatsoever about their state of
 12 mind. We could be given a gist so that we can make some
 13 representations. There is no reason why we can't be
 14 given a gist about the particular state of mind of an
 15 officer, the particular risks. When we come to the
 16 individual applications I will show you that we know
 17 nothing, we can't make any meaningful representations
 18 whatsoever.
 19 If that officer is an officer that we are concerned
 20 with, who infiltrated our groups, we should have an
 21 opportunity to say something.
 22 THE CHAIR: So what do I have to do? I have to conduct
 23 a risk assessment provisionally on the basis of what
 24 I am told by and on behalf of the officer. Then filter
 25 it so as to see what can be said to the public at large,

Page 72

1 and then invite submissions on that and then, and only
2 then, make decisions about restriction orders?
3 MS KAUFMANN: Yes.
4 THE CHAIR: In which decade do you wish this Inquiry to
5 report? That is not a facetious question.
6 MS KAUFMANN: If this Inquiry is going to get to the truth,
7 it is going to have to engage in a fair process that
8 enables it to reach the right decision on these
9 restriction order cases.
10 Now some are going to be much easier than others.
11 There are going to be many cases unquestionably where we
12 are not dealing with a situation where the officer is at
13 risk to life or limb. In those cases we don't have to
14 engage in this process. It is those cases where you are
15 genuinely being invited to address a risk to life or
16 limb or a serious psychiatric concern arising from
17 disclosure that we are going to have to engage in this.
18 Again, I don't know which of these officers are
19 putting forward evidence which arises in relation to my
20 group of clients. I don't know. But if it arises in
21 relation to the infiltration of an extreme right wing
22 group, which I don't represent, and which are not core
23 participants, then, sir, you don't have to be concerned
24 with that. So it is actually much more focused than you
25 are suggesting.

Page 73

1 Yes, it is absolutely critical you get this right.
2 It is absolutely critical, because it is the key that
3 opens the door to you getting to the truth and if you
4 get this wrong then you are simply not going to get
5 there.
6 And particularly in circumstances where we know that
7 the police officers are going to say, "You can't release
8 the cover names because of the mosaic effect". In this
9 modern world where everybody is online, police officers
10 are online, they can easily be tracked down. Unless you
11 make a proper risk assessment then you are going to be
12 liable in many cases to be closing the avenue to the
13 truth down by neither disclosing real names nor cover
14 names.
15 Sir, those are our submissions on disclosure.
16 THE CHAIR: And on principles generally?
17 MS KAUFMANN: And on principles generally.
18 THE CHAIR: Thank you. You have finished by 4.30, which is
19 excellent.
20 We will resume the open hearing at 10.30 tomorrow.
21 (4.30 pm)
22 (The hearing adjourned 10.30 am, Tuesday, 21 November 2017)
23
24
25

Page 74

A				
A.11 17:8,9	acquires 46:10	57:3 59:21,22	arisen 51:15	attitudes 25:10,17
A.2 16:1	Act 2:2 36:5,6,10	amount 33:16,20	arises 51:1 73:19	25:23 32:17
A.2(1) 16:7	Action 64:9,10,16	61:13	73:20	attracted 6:8
A.3 16:10	activities 21:15,20	amounted 39:10	arising 45:14 47:3	authorities 2:7 5:20
A.9 16:24	23:14 26:12 36:13	amounts 28:16	60:15 65:4 69:15	automatically
ability 17:2 45:23	37:3 48:5 58:14	analogy 56:4	73:16	70:12
63:6	62:23 70:23	analysis 14:7	arose 22:10,16,17	available 16:11
able 27:15 37:21	activity 38:2	and/or 17:15	arrived 50:9	avenue 71:24 74:12
48:12 51:4 57:6	addition 5:24 30:13	anger 65:19	article 38:23 48:21	avoid 46:16
67:2 68:23 69:24	30:14 35:11	angry 51:13 65:18	55:11 56:14	aware 69:13
72:6	additional 46:4	anonymity 9:1,5,18	articles 56:19	awful 38:24,24
absence 38:14,16	address 24:16	answer 8:15 61:1	aside 45:19	
absent 44:2	34:22 73:15	71:16	asked 60:5 61:16	B
absolute 40:7,9,16	addressed 21:6	Anti-Fascist 64:10	asking 30:18,20	b 32:13
absolutely 5:6 9:3	addresses 34:3	64:15	71:4	back 21:20 60:21
10:6 19:6 21:21	addressing 11:3	anticipate 33:20	aspect 25:23 71:12	balance 17:23
22:9 25:3,8 33:15	13:24	anxious 3:19 63:1	72:3	18:13 24:8 27:16
40:16,20 48:10	adds 42:7	anybody 21:8 33:6	aspects 69:18	33:18 38:20,21
49:10 53:21 67:23	adequacy 34:13	33:8 70:25	asserted 44:7,8	39:16 42:3 47:1
72:11 74:1,2	adequately 13:10	anyway 21:16	assertion 44:12	47:13 51:7 52:25
abstract 3:25	adjourned 74:22	66:21	assertions 64:14	58:4,25 59:10,16
abuse 33:11,12	administrative	apart 41:22	assess 34:13 60:15	61:19
37:8 56:7	8:13	apologise 11:12	assessing 51:24	balances 37:14
abused 25:16	admitted 27:13	20:20	63:23	50:20
abusing 37:15	advocates 1:12	appear 49:11 59:4	assessment 58:15	Barr 1:10,11,14,25
abusive 25:17	affect 71:14	appeared 2:1	63:18,19 64:20	2:5
26:14 27:7	afraid 60:23 69:4	appears 44:17 45:3	66:11 67:22 70:11	base 69:3
accept 23:18 25:22	afternoon 1:19	applicant 17:25	71:10 72:23 74:11	based 35:22 70:11
40:12,13,25 53:21	ago 22:8,17 29:25	application 10:23	assessments 14:23	basis 4:25 27:4
70:7 72:10	agree 9:23 12:3	36:10 50:13 71:20	63:11,16 65:7	48:10 56:21 68:6
accepted 56:20	23:22,24 32:22	applications 2:16	assignment 39:23	68:7 71:15 72:23
accessibility 16:13	36:19 46:24 68:15	17:21 72:16	39:25	basket 46:7,9
account 17:21	alloy 16:12	applied 4:8	assist 3:22 33:6,8,9	batch 67:19
27:15 42:8 56:9	allegation 42:17	48:24	33:17 36:20	bear 4:10 5:3
57:17 58:11 66:8	53:14	applies 25:12,16	assume 28:9,14	bearing 27:9 31:13
accountability 8:22	allegations 51:11	48:24	assumes 39:23	beginning 4:6
39:2,3	51:14,18,20 52:6	apply 3:5 4:2,4,20	assumption 35:22	27:24 46:8 58:19
accounts 52:16	54:12,20 55:17	4:21 5:17 9:24,25	assure 41:19	begins 45:9
achievability 28:6	56:5,6 66:10	27:14 40:4 42:24	assuring 51:3	behalf 1:6 2:19
achieve 45:10	69:15 70:1,10	applying 2:15	attached 40:5	11:23 18:2 39:18
acknowledge 68:16	alleged 52:4 53:12	appreciate 68:25	47:23	72:24
acknowledged	56:13	69:1	attempt 21:2	behaved 26:13,14
52:22	alter 66:24	appropriate 27:17	attention 35:5,7	28:19 31:6
acquired 37:7	alternative 20:12	63:13	attitude 26:21,21	behaviour 28:21,22
	20:16 50:3 56:25	argue 18:20	27:7 32:22	29:20 30:15 31:3
		arguments 53:7		

31:21 51:25 52:10 behaviours 25:18 31:9 beings 31:1 believe 10:15 22:12 belonging 30:21 betrayed 54:25 55:22 better 40:14 beyond 60:5 bias 28:23 bigotry 28:23 bit 60:10 black 31:25 32:9 blatant 31:12 blind 71:4 blowers 24:23 blowing 25:12 blown 43:9,9 Bob 54:3,8,10,20 55:6 65:11 bottom 25:9,10 33:2 58:13 bound 68:21 Boyling 53:9,11 54:3,9,11,21 65:11,20 66:9,18 Boyling's 55:6 Brandon 1:17 break 60:6 62:1,4 briefing 63:19 briefly 5:19 11:7 19:15 bring 54:15 broadcast 35:21 broadly 35:25 bullet 63:21 bundle 19:16	campaigning 25:6 campaigns 32:9 capable 48:25 49:12 51:6 62:15 care 65:6 career 32:4 34:2 35:4,23 careers 27:25 30:5 35:9 case 3:9 4:4,8,23 5:5 6:24 8:20 9:18 10:22 24:11 26:21 38:20 40:5 41:9 43:3,4 45:24 45:25 46:21 48:18 50:3,12 52:6 54:10 56:20 62:18 67:10 69:24 70:7 cases 3:16 5:8 18:23 19:3 20:13 20:17 22:16,19 28:10 32:5 37:22 42:24 48:24 50:15 56:12 59:6 61:4 61:20 63:1 73:9 73:11,13,14 74:12 cast 1:12 catered 42:7 45:23 53:24 caught 55:14,17 cause 6:15 48:5 caused 55:17 caution 64:12 cautious 65:8 caveats 12:20 central 18:21 25:3 25:8 58:21 60:16 centre 56:7 certain 28:19 31:10 50:20 63:25 certainly 11:9 21:9 31:4 57:13 59:2 67:3 certainty 43:18 cetera 64:2	chair 1:10,13,21 2:3,17,24 3:6 4:11 4:24 5:10,13,22 5:25 6:19 7:5,25 8:5 9:7,14,18,23 10:11,18 11:1,6,9 11:14,19,22 12:3 12:8,23,25 13:25 14:6,20 15:5,9,20 15:23 16:2,6,19 17:8,10 18:5,9,22 19:6,18,23 20:2 20:20 21:16 22:7 23:4,22 24:10,19 25:1,22 26:4,16 27:24 28:11 29:10 29:22 30:16 31:24 32:22 33:20 34:7 35:1,19 36:14,19 37:22 39:7,22 40:7,11,14 44:7 44:17,24 45:7,18 46:6 47:15,18 48:16 49:3,6 50:1 52:20 53:17 57:2 57:4,18,23 59:2 59:23 60:2,11 61:7,21,25 62:6 62:10 65:23 66:1 66:6,16 67:3,7,16 68:2,15 69:7 70:14 72:22 73:4 74:16,18 change 5:1 20:25 Changes 1:15 check 2:9 checks 37:14 Chiefs' 1:25 circumstances 4:15 9:21 14:16 15:10 20:7 24:4,5 32:10 32:14,23 38:15,17 40:2,4,19 41:8 44:8 46:19,23 49:4 53:19 57:6	57:11 59:18 66:14 74:6 cited 2:7 civil 15:6 27:10 class 29:24 clear 12:4 21:17,17 21:18,21 40:17,21 41:24 49:14 65:3 clearer 5:14 clearly 23:7 31:13 32:1 46:11 59:10 client 69:3 clients 63:9 67:24 69:16 71:16 73:20 close 32:2 59:4 closed 3:13,14 10:13,14 11:25 14:14 18:24 closing 64:6 74:12 cogency 56:23 cogent 63:3 coin 7:25 8:2,3 come 7:3 9:1,6 12:11 20:25 24:8 26:15,25 27:12,19 28:13 32:2,15,24 36:18 49:21 53:25 56:12 58:14,22 59:12 60:18 63:15 66:13,16 72:2,15 comes 14:18 25:14 25:14 38:21 46:17 51:24 59:11 72:9 coming 29:2 55:18 56:6 62:11 commitments 1:21 common 44:20 compared 64:1 compelling 17:17 38:17 39:14 44:2 44:13 52:23 63:3 competing 6:3 16:3 complaint 61:8 completely 18:11 32:22 42:18 55:22	components 17:4 concealing 59:8 concealment 12:18 conceive 15:10 concern 6:9 11:3,5 16:12 47:23 51:9 54:22 55:2 69:15 73:16 concerned 13:21,23 19:3 54:2 59:23 69:2 72:19 73:23 concerns 55:12 63:7 72:2 conclude 43:8 concluded 2:10 14:8 60:8 concludes 12:17 conclusion 11:8 14:19 45:8 63:5 conclusions 15:25 concrete 3:25 condition 72:9 conditional 46:13 conduct 27:8 28:16 38:20 69:9,16,16 69:19 72:22 conducted 2:8 14:6 18:24 28:2 48:14 conducting 11:25 confidence 7:14,16 7:18 12:11 48:13 48:15 51:3 confidential 37:15 confidentiality 10:7,8 39:19,20 39:22,24 40:6,16 40:19,23 41:7,14 41:16,23 42:1,6 42:13,15,21 43:23 44:22 45:4,9,16 45:20 46:5,8,12 46:18 confidentially 40:17 Confirm 14:4,5,6,7
C				
C.2 17:7,20 Cairo 40:21 call 21:8 30:2 39:15 calls 6:11 8:21 campaign 31:25				

14:10,15,21,25 15:4,5,12 41:17 45:20 46:5,6 confirmed 14:13,15 15:16 conflicting 13:6,10 13:13,14 confront 55:2 confrontation 51:23 52:14 53:2 confronted 51:13 51:17 52:9,19 54:17 confusing 71:8 connection 44:15 consequence 3:14 55:22 consequences 16:25 52:18 consequential 7:14 consider 5:8 27:17 59:10,19 62:20 68:7 considerable 64:17 consideration 6:4 12:19 27:13 39:18 considerations 17:3 27:17 46:20 62:11 considered 2:7 10:23 39:16 50:6 considering 67:11 67:19 Constantly 10:12 contact 32:24 contents 66:3 67:9 context 39:21 continue 43:23 62:1 continued 25:18 contradict 70:1 contrary 9:7 38:17 45:2 49:15 51:7 contrast 13:1 Convention 56:20	convictions 28:21 core 1:6 2:8,19 9:3 13:19 31:5 36:21 70:15 73:22 correct 2:13 corrected 54:13 cost 56:8 Council 2:1 count 53:2 counter 33:7 countervailing 17:13 42:8 course 8:12 12:13 21:4 26:9 31:7 37:19 40:11 41:13 48:2,22 50:8 51:2 55:14 56:8 58:22 63:9 67:16 court 10:12 courts 38:25 cover 4:20 12:5,16 13:15 18:19,20,25 19:5,21,25 20:1,6 20:9,17 21:24 23:11,18,22,25 24:5,17,19 26:9 29:17,18,23 37:20 38:16 52:3 54:14 58:2,11 62:17,19 62:20 74:8,13 covers 30:1 covert 10:6 creates 39:25 criminal 27:11 critical 21:22 23:18 31:18 36:23 56:24 57:1 60:13 71:13 74:1,2 criticism 48:5 50:22 53:2 culture 22:12,16 23:15 current 15:12,15 67:19 70:24 currently 67:19	D	D 1:3 damage 16:20 45:21 47:2 damaging 68:13 dangerous 39:23 dark 67:25 date 72:8 days 3:11,15 deal 3:17 11:22 19:9 65:1,5 69:22 dealing 3:25 20:21 25:15 27:5,10 29:24 36:1,2,3,11 39:12 43:19 53:5 53:24 62:22 73:12 deals 12:15,24 13:5 13:18 14:1 dealt 14:12,13 18:7 24:23 53:22 death 25:7 debate 3:20 decade 73:4 decades 52:18 deceased 22:4,7,20 49:22 deceitful 32:25 deceived 52:15 69:4 decide 5:4 42:3 58:7 59:16 decided 31:25 deciding 21:1 61:13 decision 19:4 20:22 20:24,25 50:4 71:11,13 73:8 decision-maker 8:15 decisions 3:14 19:7 31:11 32:7 39:9 66:24 68:19,24 69:11,14 73:2 decisive 17:6 declining 45:1 defeat 18:15 42:17	47:25 48:11 71:19 defend 50:1 degree 53:2 68:19 69:1 deliberations 29:7 demonstrate 44:14 69:11 demonstrates 45:6 45:12 Demonstration 14:11 15:21 22:10 23:3,8,17 25:20 26:7,10,18,20 28:1,4 29:12,15 30:5,7,21 35:2,20 36:2,12 37:25 64:6 denied 15:16 Deny 14:4,5,6,7,10 14:15,21,25 15:4 15:5,13 41:17 45:20 46:5,7 departure 2:22 12:7 depend 58:8 dependant 54:8 depending 32:13 depends 40:1,7 46:23 49:4 deployed 15:6 44:10 50:12 64:8 deployment 15:15 20:15 21:3 22:7 26:7,11 28:18 29:9,12 31:3,14 32:23 33:5 deployments 14:12 15:12,19 22:10 derived 23:3 described 66:8 desire 55:2,16 despite 34:17 36:4 36:7,9 64:6 detailed 35:24 determination	39:11 developments 2:9 devoting 61:12 difference 30:9,16 different 1:12 3:4 6:23 8:1,3 14:18 24:6 27:14 28:21 29:16 30:4,8,24 31:1 50:16 54:6 57:21 61:11 66:7 67:5 difficult 18:23 69:3 diminishes 28:7 directly 16:22 17:4 51:17 disadvantage 35:3 disagree 40:10 disbelieve 67:9 disciplinary 44:9 disciplined 35:3 disclosable 72:8 disclose 19:4,21,25 20:6,8,23 24:4 28:22 37:6 41:11 42:23 54:9 66:11 69:23 71:19 disclosed 20:10 21:24,25 23:19,24 24:6 28:21 38:14 38:16,19 39:14 49:25 50:10 53:1 53:20 64:21 disclosing 29:10 38:5,7 49:19 74:13 disclosure 6:14 7:22 12:10 13:15 17:24 18:20 19:10 20:14 29:17,18,23 40:23 41:2,8,10 41:12,21,25 42:5 42:9 43:4,24 44:1 44:5,16 45:14 46:2 53:6 54:14 54:15 55:13,23
--	---	----------	---	--	---

56:16,18 59:15 60:19,22 61:1 62:20 67:4,17 69:18,20 70:5,8,9 73:17 74:15 disclosures 43:10 discover 28:2 dislike 38:13 displayed 26:20 displaying 31:8 displays 31:21 disposition 28:22 disrespectful 26:22 distorted 66:11 distribution 66:1 disturbance 46:21 disturbed 49:7 division 33:6 document 46:2 documents 6:7,13 doing 5:12 9:23 20:21 22:6 30:23 37:12,14 55:23 60:23 domain 55:18 66:21 67:12 door 74:3 doubt 5:7 33:4 46:15,17 drafted 11:22 draw 4:17 56:3 63:4 drop 44:14,15 45:12 drying 44:5 due 21:4 duty 17:5 dwell 18:25	easily 74:10 economical 5:12 effect 18:6 40:22 62:19 68:13 74:8 effective 16:20 17:15 27:24 effectively 14:18 effectiveness 19:19 effort 61:13 either 30:12 37:21 46:5 60:13 elderly 46:21 elevate 67:10 embarrassment 47:2 49:7 emerged 41:5 emergency 1:24 empty 10:12 enable 61:25 enabled 67:4 enables 21:25 73:8 encourage 9:1,6 engage 56:19 73:7 73:14,17 engaged 27:21 29:19 30:12,14 31:2 34:18 48:2 52:4,7 54:14 55:20 engaging 22:23 enlighten 33:14 enormous 28:6 61:12 ensure 3:20 36:7 63:11 ensuring 8:7 entirely 2:13 7:11 9:23 14:14 18:13 23:22 29:5 36:19 41:15 44:18 54:6 55:15 57:21 67:13 70:20 entitled 31:5 equally 25:15,17 equation 6:10	38:22 erosion 46:1 essentially 11:25 et 64:2 evenly 17:5 event 3:22 eventually 69:11 everybody 35:19 60:21 69:12 74:9 evidence 6:7,13 12:25 13:1,6,10 13:13,14,17 26:25 27:4,8,16 28:13 28:16,18 29:6,11 29:19 30:1 31:4 31:12 33:3 39:4 41:5 44:3,13,19 44:24 45:5,11,11 51:21 53:22 54:5 54:24 55:3 56:24 58:16 63:2,8 64:13,18 65:3,16 71:15,25 72:5 73:19 evolved 8:13 exactly 11:12,17 15:8 18:11 24:22 24:22 29:16 39:9 examination 7:7 examine 6:6 11:5 examined 32:4 example 14:23 20:1 20:8,12 22:24 24:24 37:11 39:5 51:10 55:20 58:19 63:17 64:15,23,25 64:25 65:10 67:10 67:18 excellent 74:19 exceptional 38:15 43:4 exercise 14:16 26:16 60:22 expand 18:6 29:5 61:11	expanded 28:8 expansion 28:5 expect 40:22 expectation 10:8 expected 41:1,3,4,7 50:13 expecting 1:20 experienced 33:11 33:12 explain 70:1 explained 27:6 explanations 31:16 explored 51:2 exploring 27:25 expose 32:11 exposed 53:1 expressed 46:14 expressing 65:19 expressions 51:11 extends 41:6 extent 28:7 34:3 extrapolate 53:17 extreme 57:7,9 58:5 59:22,22 63:25 64:9,11 73:21 extremely 12:19	48:20 49:1 factors 6:21 7:6,19 8:23,25 10:9 16:4 16:17 17:20,22 18:14,17 24:15 38:6,22 42:4 46:3 46:25 47:2,7,13 47:14,16,17 49:6 49:8,9,10,12,19 51:6 57:13 58:10 61:18 62:15 facts 2:15 3:25 68:8 fails 18:11 fair 17:23 32:13 73:7 fairly 60:25 69:10 69:23 fairness 7:21 8:7,9 8:13 13:19 16:13 17:1,5 32:15 71:21 fall 34:20 39:16 41:2 61:19 falls 3:3 4:8 24:7 40:5 53:21 false 29:25 families 48:22 56:8 family 10:2,5 21:9 25:4 49:24 55:12 55:14 far 30:17 50:6 51:16 63:8,23 67:17 68:17 69:1 72:7 favour 4:18,19 7:20 8:23 17:17 29:10 33:24,25 38:7 44:22 45:16 47:16 47:21 49:9,19 59:11 favouring 3:4,4 10:7 33:19 feared 60:11 61:11 fears 45:14 feature 23:7 35:14
<hr/> E <hr/> E 1:3 24:24 earlier 2:25 21:15 28:20 earn 69:8,22 easier 3:24 73:10			<hr/> F <hr/> F 29:4 face 8:1 11:16 41:20 53:19,22 54:5 faced 66:19 facetious 73:5 facilitates 26:2 fact 12:24 13:5 33:22 34:17 41:12 43:17 44:4,5,20 44:24 47:11 48:6 48:9 49:17 50:24 52:25 54:12 factor 17:6 33:24 33:24 39:16 44:22 45:15 48:17,19,20	

features 4:17,19 69:18	58:15 60:17 73:19	Gibson 64:25	grave 8:20	57:19,20,21 62:12
feed 23:14	found 67:8	gist 72:12,14	gravity 8:19	Healey 66:20 69:25
feeds 68:10	foundation 64:14	give 13:14,14 19:23 26:25 32:10 46:4 54:21,22 55:24 66:15 71:17	great 32:8 39:23 65:5 70:22	hear 27:4 50:18 60:20,20 71:6 72:6
feel 51:13 67:25	founded 35:23	greater 46:10 52:13	greaterly 3:22	heard 46:15
feeling 32:10	four 3:15	greatly 3:22	grounds 18:16	hearing 3:11,13 5:21 14:3 74:20 74:22
female 33:9,12	framework 4:22	group 65:4,18 70:8 73:20,22	groups 25:5,6 48:10 57:24 63:20 63:22,25 64:4,8,9 64:11,12,21,24,24 67:20,23 70:4,5 70:18,19,21,22,24 72:20	hearings 18:24 59:25
figures 56:7	Francis 1:16 2:1,4 22:25	given 3:3 13:16 24:14,24 27:19 41:18,18 43:24 47:20,21,22 54:18 55:1 58:11 60:16 63:12 66:8 71:16 72:12,14	guaranteed 40:15 40:17	held 3:12 10:14 47:10,23 48:9,18 56:9
filter 72:24	Frankly 46:13	giving 14:22 69:19		help 1:11 7:3 10:11 35:8
final 20:25	frequent 44:9	glad 50:18	H	helpful 29:7
find 3:24 29:8 55:2 70:15	frustrated 41:15	go 10:12 19:15 35:11 39:25 57:8 58:7 60:5,8 65:13	half 61:23	helpfully 61:21
finding 24:20	fulfil 17:2 35:8	goes 26:8	Hall 1:20,21	helps 8:14
findings 16:1 58:17	fulfilment 13:8	going 3:6,17 5:18 7:3 9:5 11:15,17 13:5 17:8 18:1,25 19:1,9,15 20:5,20 24:11,13 27:3,9 27:22 28:15,24 29:1,2 30:12 31:13,19,22 32:2 33:6,8,9,14 34:5 36:18 37:21 40:9 43:8,8,18,22,25 44:6 46:18 52:2,3 54:2,15,16 55:23 56:4 57:2,5,8,15 58:13 60:5,23,23 60:24 61:4 62:16 63:2 66:2 69:2,20 70:6,11 71:11,15 72:6 73:6,7,10,11 73:17 74:4,7,11	hand 6:5	high 6:2 39:7
finished 74:18	full 10:11 28:12 36:16,17 68:7	good 44:13 61:3	hands 64:19	highlighted 7:1
finishes 26:6	fuller 66:13	Gordon 1:17	hang 25:1	historical 15:18 47:6
firearms 44:10,11	fully 48:12 68:20 69:13	Grant 9:1,5	happen 5:7 26:24 34:23,24 37:1 43:14 52:2 53:14 60:2 61:12	historically 43:12
first 6:1 20:5 28:17 30:18 35:15 38:9 50:1 63:21	functions 16:16	grasp 3:24	happened 26:17 31:17 35:15 36:15 39:9 52:17 53:9,9 53:11,12,13 54:1 54:8,11,20,21	history 15:20
Firstly 6:25 13:13 19:19 24:19 40:6 40:15 43:2 51:16 53:11	further 2:7 35:13	grateful 15:8	happening 44:7 61:12	hit 68:1
five 6:21,22 61:25	furtherance 71:22		happy 44:18	HN58 39:5 50:3
fixed 31:2	future 34:24 35:4,9 37:1 43:5,6,15,20 69:17,19 70:9		harassed 54:2,3,3	HN86 24:25
flick 13:22	G		harassment 10:3 47:9 53:8 55:7	Hold 29:22 35:1
focused 73:24	gainsay 27:20 57:14 59:18		hard 60:4	hope 4:12 66:16
following 16:14	general 3:23 4:2 19:9 42:25 48:23 49:2 55:9 56:11 60:7 64:23 66:1 67:12 71:7		harm 6:15 10:1,2,4 16:18 17:15 47:1 55:10 56:14,17	hoped 24:11
force 26:8 34:3 35:13 37:2,12	generalised 46:16 65:6			hopes 35:5
forces 44:25	generality 4:9			hoping 46:16
fore 18:12 25:14,15	generally 25:6 74:16,17			hour 61:23
foreseeable 43:20	generic 3:2 40:21 63:16,19 65:11			hours 5:9
Forgive 15:9 25:22 26:16 53:17 59:2 69:7	genuinely 73:15			huge 28:16 33:16 33:20 55:1
form 25:13 32:25	getting 7:7,24 8:10 9:9 19:12 36:21 59:4 68:12 71:23 74:3			human 31:1 36:7
former 16:21				hurt 52:15 54:25
forth 15:2 31:15 57:10 65:15				husband 47:25
forward 7:3 9:2,6 28:14 39:18 42:10 42:22 46:25 53:25				I

62:21 63:22 69:21 70:12 identified 16:4 17:18 19:13 21:25 36:9 48:19 49:15 52:4 identifies 6:2,21 8:20 16:17 identify 34:12 35:4 35:10 43:12 identifying 7:10 8:25 35:13 identities 41:21 44:1 70:19 identity 16:21 20:18,22 30:13 38:14 43:8 64:16 64:21 71:13,19 illustrate 67:6 impact 42:23 55:13 63:5 impartiality 16:13 imperative 5:4 implication 44:17 implications 4:17 4:19 13:12 implicit 45:8 implied 40:18 46:14 importance 13:18 18:3 56:1 58:21 66:12 important 7:9,15 7:19 11:16 12:9 12:12,19 13:19 19:2 21:12 22:15 23:13 25:12,21,23 32:18 34:21 39:8 45:4 51:5 58:8,16 64:22 67:6 72:4 importantly 43:2 impose 55:7 68:11 imposed 56:22 60:17 imposing 71:25	imposition 13:4 15:1 impossible 20:10 22:21 57:12 58:13 62:24 impressed 66:18 in-the-round 58:15 inability 13:9 inadequate 34:15 inappropriate 29:19 inappropriately 28:3 included 57:13 including 10:1 37:4 50:6,7 64:9 incredibly 12:12 indicate 29:23 indicated 2:25 18:22 50:5,11 indication 18:18 50:2 indications 12:4 indirectly 16:22 individual 2:16 3:9 3:21 4:3,5,14,23 5:4,8 6:15 8:17 19:3 20:14 21:15 21:19,20,23,25 22:12 24:10 34:16 43:6,21 45:24,25 47:10 51:19,25 52:2,7,24,25 56:13,25 58:8 60:14 61:4,13,19 70:4 72:16 individual's 32:13 individuals 17:14 22:14 23:10 28:13 35:12 48:1 50:23 51:13,17,22 54:25 55:3 56:2 57:24 68:17 infer 31:5 infiltrate 70:5	infiltrated 32:1 67:20 70:4,8,25 72:20 infiltrating 63:24 67:23 infiltration 25:4 73:21 inform 29:13 61:15 64:19 66:10 information 6:7,14 37:6,16,21 71:9 informative 30:6 informed 23:11 61:17 66:14 innocently 55:15 inordinately 61:5 inquiries 10:25 44:9 inquiring 37:24 inquiry 2:6 6:4 7:15,16,18,19,23 9:8 11:4,5,24 12:12,13 13:9,10 13:21 15:1,3,7 16:11 19:11,19 21:1,4,10 22:18 25:9,10,24 27:22 28:5 29:5,14 30:3 30:10 33:2 36:23 37:10 39:6,21 41:4,22 43:5,10 43:11,17,19 44:4 44:16,20 45:2,15 48:2 51:2 58:9,20 58:22 59:10,12 60:16 64:12,19 68:4,9,14,22 69:9 71:5,7,12,22 73:4 73:6 Inquiry's 17:1,2,5 insist 72:7 insofar 23:10 63:12 69:14,17,20 instance 66:9 67:1 instances 14:9	26:13 53:18 institutional 31:19 instrumental 6:25 7:11,22 8:11 19:11 24:16 33:19 33:24 38:3,4,8 Intelligence 36:3 38:1 intend 5:9 46:11 interacted 52:24 interest 2:4 6:11,23 6:24 8:8,10,16 10:7 12:18 13:24 16:4,8 17:4,14,22 17:24 22:17 29:10 34:6 38:6 41:10 41:25 47:14 48:1 48:11,13 49:2,13 50:22,25 51:3 56:9 67:8 interested 30:2 70:17 interesting 61:9 interests 3:4 6:4,22 8:4 17:17,25 39:15 42:9 45:19 47:20,21 48:21 51:4 71:22,23 interference 55:11 56:14 internet 50:23 interrupt 20:20 intimate 22:13 32:20,25 55:21 introduce 1:11 introduction 36:4 intrusion 10:2,4 49:23 intrusive 51:10 inundated 71:2 invasive 51:9 investigating 37:4 investigation 25:3 37:13 68:8 investigative 45:22	Investigatory 36:5 36:6,10 invite 19:7 73:1 invited 70:10 73:15 inviting 71:6 involve 57:9 62:17 involved 25:11 32:19 34:4 64:15 64:20 65:1,6 involving 22:13 Irish 63:25 64:3,11 64:23 irrespective 38:8 46:4 issue 1:16 2:2 3:8 12:6 25:7 27:5 42:22 50:21 issues 13:20 14:2 25:13 30:10,10 37:9 51:1
J				
jeopardise 70:6 Jim 54:3,9,11,21 55:6 65:11 66:9 job 43:17 68:5,8 jobs 37:3 judge 8:14 judgment 18:4 judicial 10:24 13:1 34:14 40:24 41:1 43:24 jurisdiction 9:8,11 justice 2:23 5:18 6:2 7:12,17 10:24 11:2 14:3,17 18:4 18:7,12 25:5,6 31:25 32:9 38:11 43:3 49:15 50:14 justification 22:5 55:18 justified 67:13 justify 72:1				
K				
Kaufmann 1:7 2:18				

<p>5:6,11,14,23 6:1 6:21 7:6 8:2,7 9:10,16,20,25 10:17,19 11:2,7 11:12,15,21 12:2 12:4,9,24 14:1,17 14:21 15:8,18,22 15:24 16:3,7,20 17:9,11 18:8,11 18:25 19:9,19,24 20:4 21:11,17 22:9 23:6,25 24:13,22 25:3 26:3,5,23 28:9,13 29:16 30:9,25 32:15 33:9,22 34:9 35:10 36:1 36:15,22 38:3 39:12 40:3,9,13 40:15 44:12,23 45:5,11,19 46:24 47:16,20 48:19 49:5,10 50:18 53:4,21 57:3,5,20 58:3 59:9 60:1,10 60:12 61:15,23 62:7,9,11 65:25 66:2,7 67:1,4,14 67:17 68:10,25 69:14 71:8 73:3,6 74:17 keep 6:13 keeping 58:1 Kennedy 10:22 36:8 37:11 64:15 key 13:20 16:3 40:4 45:19 74:2 kind 3:7 51:23,25 52:21 68:20 Kingdom 9:15,16 know 1:21 13:14 14:6 16:7 22:11 22:21,21,24,24 23:10 29:20 32:18 32:21 33:14 34:21</p>	<p>36:8,15,16,17,18 37:11,19 43:22 44:3 51:21 52:23 57:12 58:4 60:18 64:24,25 66:4 67:18,22,24 68:17 69:7 70:3,18,23 72:5,16 73:18,20 74:6 knowledge 10:6 35:24 known 20:1,9,18 23:22,25 24:19 26:15 30:11 35:25 64:16 knows 35:19 57:10</p> <hr/> <p style="text-align: center;">L</p> <p>Lambert 53:9,11 54:3,8,10,20 55:6 65:11,19 large 56:5 72:25 largely 1:14 lately 32:5 law 2:10 8:13 40:24 41:8 Lawrence 25:4 31:18 39:6 lead 43:25 58:22 62:21 69:21 70:12 leading 1:18 21:23 62:16 leave 3:21 37:2 leaves 55:10 led 44:11 left 36:14 37:11 49:8 56:6 64:9 66:11 legal 2:6,9,11,23 3:20 4:7,16 let's 15:15 level 3:3 6:2 19:9 48:23 liable 33:22 43:25 74:12</p>	<p>lies 58:25 life 10:3,5 12:6 14:24 31:12 41:24 52:18 56:18 57:25 59:6 73:13,15 light 4:2 26:15 27:19 likelihood 31:3 43:16 51:24 limb 12:6 14:25 41:24 56:19 57:25 59:6 73:13,16 limited 29:23 39:21 line 59:19 72:3 linked 7:12 45:14 47:3 list 70:21 listening 2:4 52:20 litigation 15:7 little 39:7 48:18 60:10 long 22:8,17 26:6 29:25 61:5 longer 20:9 61:22 look 3:1 4:5,14 11:7 12:22 17:20 18:17 19:1 26:17 27:1 28:25 35:9 38:4 45:23 46:3 58:17 59:21 60:12,13,18 62:11 looked 4:23 looking 15:18,20 22:9 24:10 27:22 28:10 30:3 37:10 42:20 43:15 58:16 looks 11:18 12:10 65:15 Lord 2:23 5:18 6:2 7:17 10:23 11:2 14:3,17 18:4,7,12 38:11 43:3 49:15 50:14 lot 3:13,19 13:6 19:2 38:24,24</p>	<p>58:24 63:10 71:2 loved 25:7 low 40:6 49:23 lower 13:3</p> <hr/> <p style="text-align: center;">M</p> <p>magnitude 3:18 30:4 main 16:17 maintaining 42:1 major 14:2 46:18 majority 32:8 70:22 making 3:6 20:25 48:22 53:10 male 32:23 33:10 33:13 man 26:21 67:11 manageable 28:25 managed 57:12 management 23:2 23:15 manager 33:5 managerial 39:5,8 managers 23:13 32:22 manages 34:16 manner 25:19 Mannion 1:18,23 Mark 36:8 37:11 64:15 massively 4:4 material 13:2,2 27:12 33:16,17,21 33:23 50:5 60:18 64:18,18 69:24 71:2 72:7 materials 63:19 matter 4:8 6:8 8:11 8:19,20 16:12 22:24 34:5 39:10 40:24 44:19 46:13 54:6 55:16 56:10 57:22 matters 11:4 36:21</p>	<p>58:17 maximum 61:24 mean 54:16 56:15 57:10 meaningful 72:17 meaningfully 51:5 means 16:11 24:20 40:5 56:25 57:3 58:12 measures 57:18 58:1,4,5 59:7,21 mechanism 20:16 21:14 24:1,2 mechanisms 35:16 37:5 media 38:23 47:5 47:24 48:11 meeting 66:8 member 21:9 33:12 members 55:12,14 men 25:17 mention 17:9 mentioned 66:22 mere 27:11 merely 7:25 Metropolitan 1:19 14:4 mind 5:3 11:16 37:23 72:12,14 minded 18:22 19:6 49:12 50:1,7 66:25 71:4 minutes 61:25 misbehave 40:1 misbehaved 27:1 misconduct 22:13 34:18 51:14 mistakes 36:24 misunderstanding 26:3 misunderstood 15:10 53:4 mix 13:17 modern 74:9 moment 2:21 21:7</p>
---	--	---	---	--

23:4 24:16 25:1 25:22,25 29:22 32:15,19 49:11 59:23 70:7 Monday 1:1 morning 1:14,16 2:1 7:2 18:18 50:12 60:9,20 mosaic 62:19 74:8 motive 31:12 32:1 32:11 motives 31:23 move 6:16 10:19 15:24 16:24 37:20 51:8 59:12 moved 57:10 moves 26:7 60:16 moving 12:6 14:2	42:23 43:5 49:19 53:6 62:18,18,19 74:8,13,14 National 1:25 36:2 37:25 nationally 45:1 nature 19:7 32:25 57:11 necessarily 9:6 22:4 40:12 57:6 58:12 necessary 13:8 17:13 19:20,24 20:6,8 22:6 29:17 65:24 necessity 17:16,19 18:16 62:25 need 3:7 5:4,4 6:6 6:13 7:2 10:15 15:3 21:6 24:3 39:1,3 44:13 45:5 59:14 60:6 61:1 61:22,23 65:13 69:23 71:5 72:7 needs 25:9,10 32:4 34:23 71:6 negative 47:5 51:23 63:5 neither 14:4,5,6,7 14:10,15,21,25 15:4,5,12,16 41:16 42:19 45:20 46:5,6 74:13 never 26:10 37:23 40:22 41:3,7 57:15 new 37:3,3,3,17 non-disclosure 58:11,12 62:17 non-police 1:6 2:19 7:21 9:24 10:3 non-state 1:6 2:19 13:19 70:15 note 50:2 63:20 notice 5:1	November 1:1 74:22 number 18:2 19:7 61:18 64:8 numbers 44:15,24 70:18	3:24 4:3 7:8 9:6 9:12,13 10:1 12:17 14:24 16:22 18:2 22:22,25 23:1,2,12 25:11 26:25 27:6 28:12 28:15,18 29:2,9 29:21 30:5 32:7 32:19,23 34:3 35:9 36:9,16,25 37:2,6,7,18 39:19 40:4,15,25 41:19 42:9 44:5,10 45:13,21 48:3,21 50:13 53:8 54:1 54:13,19 57:9 64:8,20 65:14,18 67:18,23 70:4,6 73:18 74:7,9 officers' 43:5 Okay 5:13 old 20:13 older 23:20 once 4:3 11:11 37:20 52:3,25 one's 62:12 ones 3:17 19:4 25:7 37:10 45:23 50:8 62:15 online 74:9,10 open 3:14 7:12 10:23 58:6 74:20 Opening 1:5,9 openly 48:14 openness 3:4 4:18 6:11,23,23,25 7:20 8:21 13:24 14:1 16:9,16 17:18,23 18:3,13 18:15,15 33:19,24 33:25 39:15,17 41:10 47:17,21 49:2,13 51:1 opens 74:3 operate 68:6	operating 25:5 29:25 49:14 operation 23:23 operational 16:23 operations 23:16 23:20,21 26:12 31:8 47:6 opportunity 3:1 13:16 61:2 63:13 66:4,12 71:17,17 72:21 opposed 4:15 17:4 27:10 65:18 opprobrium 48:9 51:11 oral 50:7 orally 18:6 order 3:18 5:21 12:16 13:4 16:25 20:7 23:19 30:4 34:22 36:3 38:1 41:19 55:8,19 56:21 59:11 62:16 62:25 71:20,25 73:9 orders 3:5 15:2 20:22 59:24 60:17 61:14,16 68:11 69:15 73:2 ought 23:24 outcome 7:19 12:14 48:15 50:15 62:22 71:14 outfit 35:24 outline 63:7 outset 50:21 outside 9:14,16 26:10,18 34:2,10 37:24 outweigh 49:1,8,20 50:25 outweighed 17:19 outweighing 49:13 outwith 9:7,10 overall 58:16
<hr/> N <hr/> N 1:3 name 19:5,5 20:1,8 20:9,10,17,23 21:12,13 23:22,25 24:3,4,5,19,21 26:9,9,12,15 29:11,18,23 37:20 38:16,23,24 39:1 49:9,25 50:10 51:5 52:3,23 53:1 53:20 54:10,15,16 56:16 58:2,11,12 59:8 62:20,21 66:20 67:11 named 48:1 56:2 names 4:20,21 12:5 12:10 13:15 18:19 18:21,25 19:1,2 19:10,10,21,25 20:3,4,6 21:19,24 23:19 24:17,17 25:25 27:19 28:11 29:2,17 32:12 37:18 38:4,5,7,19 38:20 39:13,14		<hr/> O <hr/> objectionable 66:20 observation 11:19 12:10 obtain 21:2,5 obvious 6:3 25:13 obviously 11:10 12:3,6 18:19 19:2 27:8 46:12 52:13 55:23 63:22 occasions 26:17 occurred 23:23 52:21 occurrence 45:2 occurring 44:21 Offenders 2:2 officer 4:5 14:23 20:14,19 22:1,3,4 24:20 26:5,5,6 27:20 29:3,4,19 30:12 31:2,6 33:9 33:10,13 34:16,19 39:3 41:25 43:6,7 43:21 45:25 47:12 47:25 48:6 49:22 50:24 51:12,13,20 53:14,19,25 55:20 57:25 58:2,9 59:4 59:8,20 69:21 70:13 71:13,18 72:10,15,19,19,24 73:12 officer's 20:18 24:11 29:18 58:14 58:21,23 59:5,13 62:13,23 officers 3:10,12,22		

override 56:1	pattern 28:20,22	15:7 46:18 47:15	possible 6:6 20:12	price 9:8,18
overrides 56:9	patterned 30:14	plea 60:21	21:14,19 22:1	primary 24:9 39:18
overt 31:20	Pause 6:19	plead 40:18	29:6 48:12,14	principal 16:3,11
<hr/>	pays 35:5	please 5:3 70:23	59:19 63:13 68:5	61:16,17
P	Payter 1:19	pm 1:8 62:3,5	69:23	principle 10:24
page 16:1 19:17	peace 49:8	74:21	possibly 46:20	23:24 28:6 47:15
63:20	people 28:1 29:24	point 6:16 13:6	68:17	55:9,16 56:11
paid 9:9,19 35:7	35:2 44:25 46:21	21:22 23:12,18	post 27:25 29:12	61:14 70:17
paper 46:7,9	48:4,7 51:16	38:9,18 41:12	30:5	principled 49:3
paragraph 6:1,17	52:22 53:7 56:9	42:18 52:1 53:16	posts 37:17	61:9
10:19,21 11:18,20	65:19 66:25 69:9	55:8 63:21 68:21	potential 62:22	principles 2:11,15
11:22 14:17 16:5	71:4	pointing 9:23	potentially 62:17	2:23 3:2,20 4:7,16
19:14 24:24 38:10	perfectly 69:8	pointless 14:16	power 21:8,11 42:2	5:17,20 7:12 8:12
49:16 63:21 65:2	perforce 24:10	points 34:9 53:10	powers 21:6 36:5,6	50:14 61:11,15
paragraphs 6:17	period 28:3	police 1:19,25 7:8	36:10 41:22 42:7	74:16,17
part 3:11 8:12	person 32:3 52:9	9:6,12,13 10:1	60:2	private 10:3,5 37:4
12:16 14:11 15:7	52:10,13	11:24 12:17 14:4	practical 16:25	37:12
15:13,24 18:1	person's 32:1	16:18,21 26:8,24	practice 18:23	probably 61:23
23:16 27:5,6 28:1	personal 17:21,24	29:2 32:19 35:13	47:19	70:16
28:18 36:23 46:19	persuade 20:24	35:23 37:7,12	practices 22:12,23	procedure 10:13
47:15 48:20 50:22	Peter 22:25	38:1 44:5,10,25	pragmatic 68:24	proceedings 7:15
55:24 65:22 68:9	phase 68:3	45:24 47:12 48:3	praised 48:8	12:1 13:1,2 16:14
68:13	photographs 20:14	48:6 49:22 50:24	pre-closed 13:2	17:1 27:10,11
participant 31:6	21:2,5,10	51:20 74:7,9	precisely 26:23	41:13 43:25 44:6
participants 1:7	phrased 40:14	policing 6:8,14	56:23	44:9 68:18
2:8,20 9:3 13:20	physical 10:2 47:1	10:6 16:20 17:15	predecessor 2:12	process 7:16,18,23
17:6 70:15 73:23	55:10 56:14 57:20	25:19 32:17 34:14	preference 58:1	8:9 13:9 16:12
participatory 8:9	63:24 64:7 65:17	43:13,20,22 47:3	59:7	40:24 41:1,7
particular 3:24 4:3	pick 4:13 35:16	policy 14:5 15:6,13	premise 35:22 41:9	48:14,15 60:12,25
4:8,14,14 9:21	picture 66:12,13	34:13,25	prepared 2:12 4:24	68:10 71:8,14
14:23 15:11,20	67:5	pool 23:1,2	5:23	72:4 73:7,14
23:4 25:11 28:23	Pitchford 6:2 7:17	poor 47:10,23	preparing 3:14	produce 21:9 29:13
31:7,17 33:13	11:2 14:3,17	ports 33:6	present 16:21	29:18 50:14
41:17 42:2 45:24	18:12 38:11 43:3	pose 57:24 69:17	presented 31:17	produced 68:6
45:25 46:2 51:12	49:15	70:24,25	44:4 63:17,18	profound 52:18
51:12 54:5 58:20	Pitchford's 2:23	posed 65:17	press 47:4 50:22,23	profoundly 42:14
61:10 62:23 65:18	5:18 18:4,7 50:14	poses 70:9	51:4	52:15 70:15
66:15 69:21 70:9	place 35:15,16,24	position 26:3 27:21	pressing 24:3	programme 57:8
70:12 72:10,14,15	36:6 37:5,15 41:4	42:15 46:9 49:12	presuming 39:13	58:6
particularly 39:2	43:16	50:19 55:25 56:10	presumption 38:13	progress 34:16
74:6	placement 15:13	56:12 58:21 61:17	38:15,18 49:17,18	68:23
parties 60:15	plainly 27:18 31:22	61:18	50:10,17,20	progressed 34:4
partner 55:22,25	34:5 35:18 48:19	positions 37:8	pretty 31:1	progression 34:2
Party 64:1	63:2	possibility 29:11	prevent 3:6 68:11	35:23
patiently 1:15	play 7:23 14:11	50:3	prevention 10:5	progressions 35:17

prominence 46:10	48:1,11,12,13	racist 26:13,20	reasonably 53:17	32:25
promise 39:19,20	49:13 51:3 55:18	27:2 31:2,8,11	reasons 9:4 14:18	release 12:5 29:1
40:18 41:14,16	56:1,5,7,8 66:21	32:16	19:13 21:23 38:3	74:7
42:6,15,20 43:23	67:12 70:20,21	radically 30:24,25	38:5 54:4,9,17	releasing 21:18
45:3,9 46:12,18	72:25	ranks 23:12 34:4	68:20	relevance 27:11
promised 39:22,24	publication 49:9	34:17,22 35:12	receives 13:11	relevant 27:15,18
promises 42:13	publicly 6:6 14:12	rate 70:21	recognise 18:11	28:17,19,24 31:4
promoted 36:14,25	publishing 25:25	rationality 43:8	55:14	31:13 33:17,21,23
prompt 30:1	purely 36:20	45:15 48:20	recognised 9:4	35:18 63:22 71:10
proof 44:19	purpose 19:11	re-read 11:10	recommendation	71:10
propensities 31:1	27:24 41:17 43:11	reach 42:4 73:8	35:6	reliance 55:5
proper 8:8 38:20	71:20	reached 2:15	recruitment 42:23	relied 65:14 66:10
74:11	purposes 7:10	read 6:17 10:21	Red 64:9	69:19
properly 13:17	42:20 57:14	11:10 50:8 52:16	redacted 65:23	relies 64:13
14:22 56:22	pursuit 6:24	66:5,17 67:7	66:3	rely 63:4
proportion 28:7	put 13:16 18:12,22	readily 25:22 31:24	refer 17:8 66:2	relying 53:8 65:6
propose 18:9	24:7 30:17 33:18	67:7	reference 13:9 17:2	remainder 12:21
proposing 4:1	35:3 37:5 38:22	real 4:21 12:10	34:8,11,12,21	remaining 46:22
proposition 67:12	39:18 42:9,22	19:1,2,5,10,10	35:8,18 64:3,5	remains 12:9 50:19
protect 45:21 56:25	46:9,25 53:25	20:2,4,8,10,23	referring 11:17	64:7
57:18 71:12	55:4 56:18 61:19	21:12,13,19 24:3	regard 47:11,24	remarks 1:5,9
protected 14:22,24	67:4 71:18	24:4,17,21 25:25	regulation 34:14,25	remind 5:19 38:9
41:20	putting 39:7 45:19	26:9,12,15 27:19	36:4,6,10	repeat 39:1 52:22
protection 10:1,4	58:5 73:19	28:11 29:10 31:22	Rehabilitation 2:2	68:22,22
17:14 57:8 58:6		32:12 37:18 38:3	relation 3:12,23 9:3	report 35:5 48:12
59:7 71:18	Q	38:5,7,14,19,20	10:24 11:4,19	51:4 68:23 69:11
protects 14:21	qualification 41:6	38:23,24 39:1,12	13:20 15:4,11,11	73:5
provide 26:13	qualified 40:20,20	39:13 42:23 43:5	16:7 18:3,19	represent 73:22
provided 65:21	quality 8:16 42:16	49:9,19,25 50:10	20:13,17 23:23	representations
provisionally 72:23	quarters 47:10	52:23 53:6,20	24:24 25:4,12,13	69:25 72:13,17
psychiatric 57:19	quasi 10:24	54:10,16 56:16	25:17,21 29:3	representing 1:16
57:21 60:14 73:16	question 24:7 28:17	58:2,12 62:17,18	30:4 31:18 32:3	reputational 47:2
psychological 10:2	28:24 30:11,25	62:19,21 64:7,18	32:16,17 37:2,4	require 32:7 34:12
10:4 62:13,13	53:5 56:24 57:22	64:18 74:13	39:3,5,24 42:25	41:10,11 53:6
63:24 72:9	73:5	realised 12:13	46:1 47:5 49:24	required 24:18
psychological/ps...	questions 60:13	reality 14:10	55:12 56:5,12	40:23 41:8,13
56:17	61:14	really 4:25 37:24	57:23 58:7,9	63:2
public 6:3,8,10,15	quite 3:10,13,19	42:11 46:11 55:10	59:20 60:22 61:6	research 2:9
7:7,9,14,16 8:3	7:5 8:10 29:25	58:13 62:24	61:18 62:12 63:8	respect 20:22 21:22
11:3,4 12:11,18	30:3 41:22 60:24	reason 2:11 18:1	63:10 65:19,20	25:6 29:3 30:9
13:24 15:15 16:4		24:17 27:13 33:19	67:10,18,21 68:16	36:20 42:4,12
16:8,12,13 17:4	R	41:18 42:22 55:7	73:19,21	51:14 62:23
17:14,22,24 33:12	race 25:7,14,14,23	65:8 67:9 72:13	relations 22:13,14	respected 36:7
34:5 36:3 37:25	racial 32:11	reasonable 4:25	55:21	41:15
38:6 43:19 47:14	racism 27:6 31:12	68:23	relationships 32:20	respecting 41:23
	31:20,21			

respects 16:15	63:16,19,23,24	50:9 68:21	55:21 56:7	small 67:10
respond 67:2	64:7,14,19 65:4,6	secret 6:13 58:2	short 5:1 17:19	SO12 33:6
responds 65:21	65:9 66:10,15	section 60:3	42:16 62:4	SO13 33:7,10
responsibility 39:8	67:21 69:15,17,20	sections 47:4,24	shortage 44:11	Socialist 64:1
restart 62:8	70:9,11,25 71:10	see 4:12 9:10,21	shorthand 60:4	sole 23:2
restriction 3:5 4:20	71:16,18 72:23	10:22 11:2 12:25	62:1	somebody 31:24
5:21 8:24 10:7	73:13,15 74:11	12:25 15:21 26:18	show 44:4 51:22	50:24 52:2,4,12
12:16 13:4 15:2	risks 53:23 72:15	30:8,9 32:2 63:20	72:16	52:14 57:7 58:5
16:25 20:22 55:8	Robert 2:1	66:7 69:5 72:25	showing 65:14	somebody's 56:18
55:19 56:21 59:11	role 13:19 14:3	seek 5:16 45:21	shut 71:11	sorry 19:22 20:2
59:24 60:17 61:14	26:8 39:5 58:23	seeking 20:24	shutting 71:24	40:11 44:23 62:7
61:15 62:16,25	59:3,5,13,15	60:21 71:18	side 6:10 18:13,14	62:9 68:15
68:11 69:15 71:20	60:16	seeks 18:3	24:8 67:5	sort 55:7 64:13
71:25 73:2,9	roles 25:19 37:3	seen 3:8 44:8 50:2	sideline 18:3	sorts 16:8 51:6
result 21:18 41:21	Rolls 68:5	52:15 56:3 65:9	significance 31:22	58:10
resume 74:20	rose 23:12 35:12	65:20 66:23 68:16	59:3	sound 45:11
retention 42:24	Royce 68:5	self 60:13	significant 17:3	source 21:3
retrospective 26:16	ruling 2:11,23 4:7	self-identifying	23:7 44:14 58:24	speak 71:4
reveal 68:20	4:16 5:18 15:25	32:6	59:5 63:23	Special 14:11 15:20
revealed 21:13 52:3	18:7 38:10 49:16	sense 4:13 41:14	Sikand 1:15	22:10 23:3,7,16
revelations 44:21	run 8:6	44:20	similar 22:23 30:14	25:20 26:7,10,18
reverse 60:24	rush 3:21	sensible 5:15 10:13	31:8 33:11,12	26:19 27:25 28:3
revisit 18:10 58:25		separate 6:22 7:11	37:8 66:19	29:12,14 30:5,7
59:16	S	7:22 8:11 15:3	simple 32:20 47:11	30:21 35:1,20
Rick 64:25	safeguards 36:5	separately 10:16	simply 8:25 15:7,21	36:1,12 37:25
right 5:22 8:9,15	safely 63:4	serious 34:18 42:17	30:17 44:6,12	64:6
13:22 19:6 22:9	safety 45:21 46:20	51:10,18,20 52:5	47:9,13 48:9	specific 60:9 66:9
34:11 49:3 50:11	sake 7:8	52:8 53:23 54:11	50:25 51:6,19	speculative 36:20
52:1,23 56:6 61:1	Sanders 18:2 34:10	55:11,24 56:14	54:23 67:5,22	36:22
63:25 64:11 68:1	42:14 46:15	57:18 73:16	68:4 69:3,5 70:17	speed 4:5
73:8,21 74:1	satisfy 27:3 69:12	seriousness 51:1	74:4	spend 3:10
rights 36:7 38:23	save 1:23 12:5	serve 16:17	sir 1:11 2:1,12,21	spied 55:1
rise 32:10 55:1,24	46:19	served 6:22,22	6:17 11:7 13:22	squad 14:11 15:21
60:8 61:25 66:15	saying 12:1 29:3	27:25 42:1,3 67:5	26:24 40:9 50:18	22:11 23:3,8,17
69:19	47:18,20 50:16	71:23	67:14 68:10 69:1	25:20 26:8,10,18
rising 34:22	54:7 57:23	serves 6:24 8:9,18	73:23 74:15	26:20 28:1,4
risk 12:6 14:23,24	says 38:12	16:9 19:11 41:17	situation 22:19	29:12,15 30:5,7
16:17 22:3,5,20	scale 51:8	service 7:9 14:5	36:12,17,17 47:9	30:21 35:2,20
39:25 44:16 45:24	sceptical 21:7	session 10:13	49:21 53:24 55:5	36:2 37:25 44:11
45:25 46:20 47:1	scope 28:5	sessions 10:14	55:6 57:7 62:22	64:6
49:23 52:13 53:19	scrutiny 7:14 32:2	set 4:6 5:17 12:20	65:2 66:19 73:12	Squad's 36:12
54:5 55:10 56:13	63:1	19:13 24:13 61:5	situations 51:8 57:9	stage 2:14 8:24
56:15,19 57:11,11	second 6:12 30:20	sets 15:25 16:3,16	Slater 1:17	39:7 58:25 59:1
57:25 59:6 60:13	41:16	settled 31:15	slightly 1:11 60:11	59:16,17 66:3
60:14 62:12 63:11	Secondly 13:16	sexual 22:13,14	61:7	68:4,18 71:9 72:5

stake 8:8,17 47:20 47:21	44:2,12 47:7,12 48:10,16,25 49:3 49:6,14 52:1,8 55:15	63:18 65:22	68:16 70:14,16,18 71:5	true 16:21 23:4,5,6 23:8,20 37:22
stall 4:6 61:6		tack 5:1	thinking 43:6,21	trust 68:19 69:2,6,8 69:22
standard 27:14 43:23	submissions 1:6,23 2:19 3:6,11,23 4:2 4:24 11:15 18:5	take 20:8 21:5 27:15 41:4 42:8 48:4,7 55:20 61:4	third 60:15	truth 7:2,7,24 8:10 11:24 19:12 20:7 20:11 22:2,6 23:20 24:2 29:8 36:21 55:2 59:14 62:24 63:6 68:12 71:23,24 72:6 73:6 74:3,13
start 22:16 39:13 42:14 50:16 59:9	19:1,8,14,16,16 45:9 46:17 48:23 50:6,8 54:7 56:3 60:7,9 61:3,8,10 65:2,12 73:1 74:15	taken 17:21 31:11 47:5 57:16 58:1 58:10 59:7 64:22	thorough 14:7	try 33:2 68:1
started 22:25 37:12		talking 8:5 20:2,4 28:20 47:8,9 57:20	thoroughly 68:2 69:10	trying 22:18 29:8 31:10,14
starting 6:16 38:18 41:12 42:18 52:1		target 51:22 68:1	thought 17:8 33:1	Tuesday 74:22
starts 41:9	submit 4:7 33:15 42:11,13 55:5 57:16 58:3 65:5	task 7:23 11:5 60:4	threat 41:24	turn 4:18,19 6:1 17:7 30:6 63:20
state 60:14 62:13 62:14 69:5 72:11 72:14	submitted 59:9	team 1:18 2:6	threats 41:20 65:15 65:17	two 6:3 10:9 13:12 16:3 30:8,16,24 45:19 53:10,18 62:11
statement 3:8 40:21,21 50:11 64:23 65:21,22,23 66:18,23 67:8	submitting 59:4 60:24	technique 46:1	three 3:11,12,15,16 10:14 18:23	
statements 40:8,10 65:10,16 71:7	substance 42:12 68:10 71:8,14	techniques 10:6 16:23 37:8,16 45:22	threshold 13:4 17:16,19	<hr/> U <hr/>
statutory 34:13	substantial 3:11	tell 7:20 10:9 18:14 30:22 42:4 47:16 61:21	tie 21:14	ultimately 58:3
step 60:21	substantive 1:23 59:12 68:3,9,13	telling 29:8 31:6	tied 44:20 45:1	unable 58:20
steps 21:5 64:22	sufficient 27:12 45:13	tend 8:23	ties 19:20,24 20:5	unalterable 49:18
stop 10:11 28:12 35:16 37:15	suggest 2:22 45:3 54:5	tension 6:3	time 3:13 4:5 5:8 20:15,15 21:2 22:8,11,17,23 23:5 26:19 29:15 29:25 30:7 31:23 33:1 47:4 61:5,13 64:17 68:24 69:12	unattractive 70:16
strength 42:16 47:17	suggested 21:4	terms 13:8 17:2 19:11 34:8,10,12 34:20 35:8,18 40:16 65:9	time-consuming 3:10	uncover 16:21
strikes 36:19	suggesting 73:25	territory 9:14,16	times 23:9	undercover 6:7,14 9:12,13 20:18 21:15 22:1,22 23:1,1 26:6 29:20 30:13 32:20 34:14 34:19 37:7,9 38:1 43:7,13,20,22 44:4,25 45:13,22 47:3,12,25 48:2,6 49:22 50:13,24 51:19 55:21
strong 13:24 22:12 38:6 39:2 49:17	suggests 42:14	terrorism 33:7	today 1:22 13:7	underlying 42:8
struck 17:23 50:21	summary 15:25	test 13:10	told 1:22 46:6 57:15 68:18 70:3 70:7 71:5 72:11 72:24	understand 1:25 4:7 15:6 22:15,18 25:25 31:10,14,24 36:23 48:16 55:25
structurally 5:15	supplemented 1:17	tested 13:17	tomorrow 1:20 60:9 74:20	
style 23:15	supporting 64:14	Thank 2:17 74:18	Toulson 10:23	
sub 16:8	supports 46:19	things 18:9 30:16 30:24 31:17 35:11 52:16 54:11 58:22 63:10,12	trace 21:19,20	
subject 8:19,20 16:12 26:1 28:15 30:2 43:24 51:25 54:19	suppose 18:6	think 1:22 3:7,18 4:25 10:11 11:16 11:22 17:10 20:2 21:6 28:6 29:22 32:5 35:19,22 44:7 52:20 57:5 59:14,20 66:20	track 59:12	
subjected 52:11,12 52:14 53:8 65:14	supposing 2:11		tracked 74:10	
subjects 11:3	sure 5:7 34:23 36:25 37:5,22 43:13 70:20		translate 16:8 53:13	
submission 2:14 11:23 20:5 24:14 34:11,20 36:22 39:20 40:3 42:25	surprise 66:16		transparency 7:9 7:13	
	suspect 71:3		treated 54:23	
	<hr/> T <hr/>		Troops 65:1,4	
	tab 19:16 40:22			

58:23 59:13 66:13 67:7,14 68:2 69:7 72:2	volunteers 44:11	68:15	X	21 74:22
understandable 55:16	W	wholly 23:24 43:3	X 1:3 26:5,5 29:4	294 20:23 21:2,3,5 22:7
understandably 55:1	W 29:4	widely 35:20	Y	3
understanding 31:23	waited 1:15	widespread 6:8	Y 29:4	3 56:19
understood 23:14	waiting 62:7	wife 49:24	year 2:10,12	4
undertake 37:3	want 2:21 3:1 7:2	wing 63:25 64:9,12 73:21	years 46:22	4 8:5,6 16:17
undertaken 15:17	18:17 24:16 28:11	wish 2:5 49:7,7 73:4	Z	4,000 29:2
undertaking 25:24	54:13 60:10,12,18	withheld 13:3	Z 29:4	4.00 60:5
unfavourable 53:1	63:7,11,15	witness 31:5 57:8 58:6 59:6	0	4.06 62:3
unit 36:3,4 38:1	warn 45:7	witnesses 7:3,21 9:1,24 10:3	1	4.10 62:5
United 9:15,16	wasn't 41:18	women 25:15,16,18 25:23 26:22 27:7 32:17,24 52:16	1 1:5 8:5,6 50:19 53:16 63:18	4.30 74:18,21
unquestionably 8:14,17 52:11 73:11	waste 46:7,9	wonder 27:24 46:10	10 38:23	44 19:17
unrealistic 69:6	way 4:12 5:12	Woods 1:18	10.1 64:5	5
unsatisfactory 68:3	10:10 15:5 20:17	words 3:15 15:9 43:15	10.30 74:20,22	5 40:22
upset 55:17,24	26:14,14 27:17	work 10:17 36:24 36:24 44:25 45:13 48:8	100 11:18 12:15,21	5.3 63:21
use 37:6 45:22	29:5 31:7 51:17	Workers 64:1	103 12:24	6
useful 32:12 63:10 63:12	54:2,23 58:7	working 33:10	104 12:24	6 15:24
utility 46:1	59:19 60:16,25	world 74:9	105 13:5	68 6:17,18,21
V	61:1 66:24 70:14 72:3	writer 62:1	107 13:18	69 8:23
value 6:25 7:11,22 8:11 12:12 38:8	ways 10:17 28:19 40:20	written 18:5 19:14 19:15 50:8	108 19:14,17 24:24	7
various 2:8 18:14	weigh 39:15 47:13	wrong 35:2,11,14 42:14,18 43:12 52:9,10,12 55:4 68:11 70:16 74:4	109 13:18	7 5:20 17:22 38:11
vary 57:5	weighed 46:25	wrongdoing 7:8,10 12:15,16,18 27:21 30:13 34:4 37:24 39:4,10 41:5 42:17,19 51:11,18 51:21 52:5,8 53:12,15 54:12,14 54:19	110 13:18	70 6:18 10:9
victims 7:10	weighing 8:24 9:22 38:7 51:6	writers 60:4	112 13:23	71 10:11
view 2:6 12:3 18:20 29:13 30:22 47:5 48:4,7 49:24 66:14	weighs 45:15	writer 62:1	12 6:1 16:5	78 16:1
violence 52:11	weight 3:3 14:8,22 39:21,24 40:1,5 45:10 46:4 47:22 48:18	written 18:5 19:14 19:15 50:8	13 63:20	8
virtue 8:16 47:11 60:14	weighted 17:5	wrong 35:2,11,14 42:14,18 43:12 52:9,10,12 55:4 68:11 70:16 74:4	142 38:11	8 17:25 19:16 48:21 55:11 56:14
volume 5:20,23 38:11	weights 24:14 30:8	wrongdoing 7:8,10 12:15,16,18 27:21 30:13 34:4 37:24 39:4,10 41:5 42:17,19 51:11,18 51:21 52:5,8 53:12,15 54:12,14 54:19	146 14:17	8.3 64:3
volunteering 44:25	Weinstein 56:5	wrongdoing 7:8,10 12:15,16,18 27:21 30:13 34:4 37:24 39:4,10 41:5 42:17,19 51:11,18 51:21 52:5,8 53:12,15 54:12,14 54:19	171 28:1,9,11,15 29:1 30:5	8.4 64:3
	welcome 18:19 66:23	wrongdoing 7:8,10 12:15,16,18 27:21 30:13 34:4 37:24 39:4,10 41:5 42:17,19 51:11,18 51:21 52:5,8 53:12,15 54:12,14 54:19	19 65:12	80 65:2
	went 35:19 37:12	wrongdoing 7:8,10 12:15,16,18 27:21 30:13 34:4 37:24 39:4,10 41:5 42:17,19 51:11,18 51:21 52:5,8 53:12,15 54:12,14 54:19	2	82 10:19,21
	whatsoever 55:3 65:16 72:11,18	wrongdoing 7:8,10 12:15,16,18 27:21 30:13 34:4 37:24 39:4,10 41:5 42:17,19 51:11,18 51:21 52:5,8 53:12,15 54:12,14 54:19	2 1:6 50:20 56:19	85 16:1
	whilst 34:18 55:21	wrongdoing 7:8,10 12:15,16,18 27:21 30:13 34:4 37:24 39:4,10 41:5 42:17,19 51:11,18 51:21 52:5,8 53:12,15 54:12,14 54:19	2.30 61:7	87 10:21
	whistle 24:23 25:11	wrongdoing 7:8,10 12:15,16,18 27:21 30:13 34:4 37:24 39:4,10 41:5 42:17,19 51:11,18 51:21 52:5,8 53:12,15 54:12,14 54:19	2.32 1:8	89 10:20,22
	whistle-blowing 25:21 26:2 34:1	wrongdoing 7:8,10 12:15,16,18 27:21 30:13 34:4 37:24 39:4,10 41:5 42:17,19 51:11,18 51:21 52:5,8 53:12,15 54:12,14 54:19	20 1:1 65:12,22	9
	wholeheartedly	wrongdoing 7:8,10 12:15,16,18 27:21 30:13 34:4 37:24 39:4,10 41:5 42:17,19 51:11,18 51:21 52:5,8 53:12,15 54:12,14 54:19	20(4) 60:3	90 11:2,7
		wrongdoing 7:8,10 12:15,16,18 27:21 30:13 34:4 37:24 39:4,10 41:5 42:17,19 51:11,18 51:21 52:5,8 53:12,15 54:12,14 54:19	2008 64:7	91 11:2,7
		wrongdoing 7:8,10 12:15,16,18 27:21 30:13 34:4 37:24 39:4,10 41:5 42:17,19 51:11,18 51:21 52:5,8 53:12,15 54:12,14 54:19	2016 5:24	93 11:8,20
		wrongdoing 7:8,10 12:15,16,18 27:21 30:13 34:4 37:24 39:4,10 41:5 42:17,19 51:11,18 51:21 52:5,8 53:12,15 54:12,14 54:19	2017 1:1 38:10 74:22	
		wrongdoing 7:8,10 12:15,16,18 27:21 30:13 34:4 37:24 39:4,10 41:5 42:17,19 51:11,18 51:21 52:5,8 53:12,15 54:12,14 54:19	203 38:10 49:16	