

<p>1 Tuesday, 7 February 2017 2 (10.35 am) 3 THE CHAIRMAN: Mr Beer. 4 MR BEER: Sir, can we call, please, Rachel Griffiths. 5 MS RACHEL GRIFFITHS (sworn) 6 THE CHAIRMAN: Thank you, Ms Griffiths. You are perfectly 7 welcome to sit down. Although we are using a courtroom 8 for this hearing, that is happenstance, this is a public 9 Inquiry, so feel free to sit down. 10 Questions from MR BEER 11 MR BEER: Ms Griffiths, my name is Jason Beer and I ask 12 questions with Ms Cartwright on behalf of the Inquiry. 13 You should have in front of you there a bundle. 14 If you can open it, please, you should see an index 15 to documents concerning you and between pages 1 and 5B 16 there should be four witness statements. Can we just 17 walk through them and identify them. 18 Firstly, a witness statement dated 20 June 2012 at 19 pages 1 and 2, do you have that? 20 A. Yes. 21 Q. Secondly, a witness statement dated 3 October 2013 22 between pages 3 and 4? 23 A. Yes. 24 Q. You have that? 25 A. Yes.</p> <p style="text-align: center;">Page 1</p>	<p>1 March/April time in 2009. 2 Q. At the time of these events, September 2011, about 3 18 months, is that right? 4 A. Yes. 5 Q. Can I ask you about subject profiles? 6 A. Yes. 7 Q. Do you know what a subject profile is? 8 A. I do, yes. 9 Q. Okay. 10 Is it right that there isn't any substantive 11 difference between a subject profile, a pen profile or 12 a nominal profile? 13 A. No, there's no difference at all. 14 Q. They are all the same thing, are they? 15 A. Yes. 16 Q. I am going to call them a subject profile, okay. If we 17 look at the file, please, at page 6, do you see your 18 document -- this is a document that you created I think 19 on 20 September 2011, yes? 20 A. Yes. 21 Q. It is called "A pen picture in relation to 22 Anthony Grainger"? 23 A. Yes. 24 Q. Yes? 25 Then, just behind you on the table there, there</p> <p style="text-align: center;">Page 3</p>
<p>1 Q. Next a witness statement dated 6 March 2014 at page 5, 2 yes? 3 A. Yes. 4 Q. Lastly, a witness statement I think dated 30 July 2014 5 at pages 5A and B? 6 A. Yes. 7 Q. Are the contents of those witness statements true to the 8 best of your knowledge and belief? 9 A. Yes. 10 Q. Can you tell us something about you by way of 11 background, what is your current position? 12 A. My current role is I am currently a police officer 13 within Greater Manchester Police and I work within 14 communications -- I'm a communications data 15 investigator, within the Covert Authorities Bureau, 16 presently. 17 Q. If you just keep your voice up so we can all hear. 18 A. Yes. 19 Q. Thank you. When did you join the police service? 20 A. As a police officer I joined in October 2003. 21 Q. At the time of these events you had about eight years' 22 service; is that right? 23 A. Yes. 24 Q. When did you join the Force Intelligence Branch? 25 A. That would have been 2009, the beginning -- around</p> <p style="text-align: center;">Page 2</p>	<p>1 should be another file, that is it, on the table. 2 This is tab 1 of your file, sir, it is a separate 3 file for the witness. 4 THE CHAIRMAN: Yes. 5 MR BEER: If you look at page 180 in there, please. There 6 are about 15 sets of numbering, I am using the red top 7 right. 8 A. Yes. 9 Q. That should be something called "A nominal profile for 10 David Totton", yes? 11 A. Yes. 12 Q. Then if you look forward, please, at the same folder at 13 204. 14 A. Yes. 15 Q. A nominal profile for Robert Rimmer? 16 A. Yes. 17 Q. They are exactly the same thing, are they? 18 A. It is the same template, it has just had something 19 different written on the front of them. 20 Q. I could show you the nominal profiles for Jamie and Paul 21 Corkovic as well, they are called nominal profiles. 22 They are exactly the same thing, are they? 23 A. Yes. Yes. 24 Q. Did you receive any formal training in the production of 25 subject profiles?</p> <p style="text-align: center;">Page 4</p>

1 **A. No.**
 2 Q. Was there any written policy or guidance that you work
 3 to in the creation of subject profiles?
 4 **A. Not to my knowledge.**
 5 Q. So no training and no policy?
 6 **A. No, I don't know if there was a policy it is just**
 7 **I hadn't had sight of it.**
 8 Q. Not to your knowledge, and you were actually doing it?
 9 **A. Yes.**
 10 Q. In relation to the practice of creating and then
 11 distributing subject profiles, was there in 2011
 12 a practice of quality assuring them before they were
 13 sent out?
 14 **A. No.**
 15 Q. Right. So no training, no policy, no quality assurance.
 16 Not the best start, is it?
 17 **A. No.**
 18 Q. Was there any requirement placed on the person or people
 19 to whom a subject profile was sent to check the
 20 information that you were providing them in the subject
 21 profile?
 22 **A. Was there any, what, sorry?**
 23 Q. Requirement?
 24 **A. Not to my knowledge.**
 25 Q. When you sent the thing across, in this case it was --

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1 in your case -- to do with an arrest of Anthony Grainger
 2 for a handling offence --
 3 **A. Yes.**
 4 Q. -- an alleged handling offence. If, when you sent that
 5 across, there wasn't a health warning that went with it,
 6 "You, operational team, may wish to check the accuracy,
 7 reliability, veracity of what we are saying"?
 8 **A. No, but I don't think my profile was used to be sent to**
 9 **an arrest team --**
 10 Q. Right.
 11 **A. -- it was used within a strategy meeting in relation to**
 12 **the operation at the beginning.**
 13 Q. Okay.
 14 **A. Yes, but there was no requirement on whoever I was**
 15 **delivering it to for them to check.**
 16 Q. Imagine if it was being sent to -- take it out of these
 17 circumstances, imagine if it was being sent to an arrest
 18 team, a search team or a firearms team, for example?
 19 **A. I don't think there would be any requirement to check.**
 20 Q. For them?
 21 **A. No.**
 22 Q. They just got it? They just received the package?
 23 **A. Well, yes, they would assume it was accurate.**
 24 Q. By September 2011 what experience did you have in
 25 relation to the production of subject profiles?

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1 **A. Well, we had done quite a few.**
 2 Q. What about you? How many had you done?
 3 **A. When I say "we", I couldn't give you a figure,**
 4 **I wouldn't know. People used to put bids into the Force**
 5 **Intelligence Bureau to provide them with subject**
 6 **profiles for various operations and we were allocated**
 7 **those as and when by my sergeant, was just asked to**
 8 **produce a profile.**
 9 Q. Is that Mr Kelly?
 10 **A. Yes. I have had a few sergeants within there, but at**
 11 **this time it was Sergeant Kelly.**
 12 Q. Yes.
 13 **A. If we were developing any intelligence or any operations**
 14 **ourselves, then we would do them as course and part and**
 15 **parcel of that --**
 16 Q. On a weekly basis how many do you think you might do, at
 17 this time?
 18 **A. Possibly three, two or three.**
 19 Q. Would that be consistent for that 18-month period on
 20 average?
 21 **A. I can't say it was consistent on a weekly basis, because**
 22 **if we were running with an operation then I would be**
 23 **concentrating on that, this would be -- the subject**
 24 **profile would be the preparations side of things so then**
 25 **that would obviously lead on to other things so I would**

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1 **spend some of my time obviously investigating and**
 2 **researching other --**
 3 Q. What I am trying to understand is: was this a core part
 4 of your job?
 5 **A. Yes, I would say it was.**
 6 Q. Was it the main thing you did?
 7 **A. No.**
 8 Q. What was the main thing that you did?
 9 **A. It was to -- there were various roles. At this time, we**
 10 **were -- all the detectives, the constables, had been put**
 11 **together and we were researching and developing**
 12 **operations, if you like, that would then be passed**
 13 **through to the sergeant to see if they could then be**
 14 **disseminated, if there was enough information to run**
 15 **an operation on them so they would then go to other**
 16 **units to progress.**
 17 Q. Would this be a fair summary: it was not the main part
 18 of your job preparing subject profiles but it was
 19 a substantial part of your job?
 20 **A. Yes.**
 21 Q. When you were preparing a subject profile, were you
 22 aware of the use to which it might be put?
 23 **A. Potentially, yes, the potential use. It would be used**
 24 **to -- by the SIO, I am assuming, of any operation.**
 25 Q. Don't assume. When you were writing a subject profile,

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1 were you aware of its intended use?
 2 **A. No. Not in full. I would be --**
 3 Q. What about in part then?
 4 **A. We would be asked to produce a nominal profile on behalf**
 5 **of an unit in relation to an operation they would be**
 6 **running. I wouldn't be involved in the operation,**
 7 **I wouldn't go to the briefing, so I don't know what they**
 8 **would use it for. It is an intelligence picture about**
 9 **a specific person.**
 10 Q. Okay.
 11 **A. Which is what I would produce.**
 12 Q. It seems to me at least that a subject profile might be
 13 used in a number of ways, including investigative use,
 14 would that be fair?
 15 **A. Yes.**
 16 Q. What phones does the subject have? What cars does he
 17 have? So that we could, for example, use other methods
 18 such as covert surveillance to investigate him, yes, do
 19 you agree?
 20 **A. Yes.**
 21 Q. To locate a suspect might be another use, what addresses
 22 does the suspect have? Where does he frequent? So we
 23 can find him, get a search warrant for his premises and
 24 execute it?
 25 **A. Yes. Yes.**

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1 Q. To assess risk before making an arrest?
 2 **A. Yes.**
 3 Q. To assess risk before executing a search warrant?
 4 **A. Yes.**
 5 Q. Alternatively to brief up firearms officers in
 6 preparation for a use of a tactic that might end in them
 7 taking decisive action towards a subject?
 8 **A. Yes.**
 9 Q. Does the use to which a subject profile may be put
 10 affect the content of it?
 11 **A. No.**
 12 Q. So it doesn't affect where you search?
 13 **A. No.**
 14 Q. And it doesn't affect what information you include?
 15 **A. No.**
 16 Q. Does it affect the care and attention to detail that you
 17 use when you are compiling it?
 18 **A. Does it affect the care and attention?**
 19 Q. Yes.
 20 **A. No.**
 21 Q. So you prepare these almost blind as to the use to which
 22 they might be put?
 23 **A. Well, yes, they are all produced to the same standard,**
 24 **if there is -- there is the ... all the same systems are**
 25 **interrogated and if something is contained within that**

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1 **system then it is included within the profile, yes.**
 2 Q. It could be that this document is used just to go and
 3 find subject called Jim and it is just a locate,
 4 alternatively it could be used to brief up firearms
 5 officers where they are taking life or death decisions?
 6 **A. It could be.**
 7 Q. And you don't know that when you are preparing it?
 8 **A. No.**
 9 Q. What sources of information do you access in order to
 10 create a subject profile?
 11 **A. Would I be able to look at the profile and explain where**
 12 **each part has come from or -- it is a long time since**
 13 **I have done one.**
 14 Q. If you want to refresh your memory, then of course. It
 15 is the file that we started with, your one, and it is
 16 page 6.
 17 **A. Yes, I've got mine.**
 18 **I mean generically we would obviously use the local**
 19 **intelligence system, GMP --**
 20 Q. I wonder whether you could help me, is there is
 21 a standard template that you would use, almost like
 22 a tick box, PNC, OPUS?
 23 **A. Yes, it is this Word document, it would have --**
 24 **everything you see within these are already populated,**
 25 **they are just blank so I would complete the profile and**

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1 **insert pictures or whatever information I have found**
 2 **from PNC or from OPUS.**
 3 Q. Let's go to this file at page 6, which if people are
 4 following that is file F/11, amongst other places.
 5 The subject profile for Mr Grainger.
 6 **A. Hmm.**
 7 Q. You say that this is a template, the contents of which
 8 are blank and you populate them?
 9 **A. Yes.**
 10 Q. That would help you to work out where to go to get the
 11 information?
 12 **A. Check out which systems, yes, to interrogate, yes.**
 13 Q. If we start on page 7, which is the first page of
 14 substance. I don't particularly want to go through
 15 every line and say where did you get it from, but if you
 16 want to refresh your memory, just tell me the systems
 17 that you access.
 18 **A. The picture we would populate would be the most recent**
 19 **picture we had on the OPUS system, the GMP intelligence**
 20 **system.**
 21 Q. Right.
 22 **A. So we would use the most recent one and then obviously**
 23 **the rest is self explanatory, any date of birth we would**
 24 **already have, that would come from either PNC or the**
 25 **OPUS system.**

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<p>1 Q. Yes. What about aliases?</p> <p>2 A. Aliases, that would come from the local intelligence</p> <p>3 system, OPUS.</p> <p>4 Q. OPUS, yes.</p> <p>5 A. OPUS.</p> <p>6 Q. If you can describe it by name that would help us rather</p> <p>7 that than "the local intelligence system"?</p> <p>8 A. Oh right, you are aware what OPUS is, okay. Everything</p> <p>9 in that personal details box would be populated from</p> <p>10 OPUS.</p> <p>11 Q. Thank you. What about the bottom of page 8 under</p> <p>12 "Subject information", there looks like some free text</p> <p>13 there, some narrative. Did you write that?</p> <p>14 A. Yes, I must have done, it is my profile, it is only</p> <p>15 I that would have wrote that. I would not have</p> <p>16 populated that from somewhere else.</p> <p>17 Q. No, so that you have, under the heading "Risk</p> <p>18 assessment", we will come back to this in a moment, you</p> <p>19 have effectively drawn together some threads from other</p> <p>20 material?</p> <p>21 A. From other intelligence, associate links.</p> <p>22 Q. And written it as narrative?</p> <p>23 A. Yes.</p> <p>24 Q. Yes, and then over the page, top of page 9, please?</p> <p>25 A. Again that is OPUS.</p> <p style="text-align: center;">Page 13</p>	<p>1 A. Experian.</p> <p>2 Q. Yes.</p> <p>3 A. And then the intelligence on page 15 and the top of</p> <p>4 page 16 would have been populated from OPUS.</p> <p>5 Q. Just stopping there, those boxes, when you say they are</p> <p>6 populated from OPUS, you cut and paste material out of</p> <p>7 OPUS and put it in?</p> <p>8 A. Yes.</p> <p>9 Q. Did it appear in this table format in OPUS or did you</p> <p>10 have a series of sets of boxes in a table here that you</p> <p>11 wrote the information into?</p> <p>12 A. I didn't write it in, I have cut and pasted it from --</p> <p>13 the intelligence is sort of held on OPUS in individual</p> <p>14 boxes, if you like per intelligence rating and the</p> <p>15 intelligence reference number and I have cut and paste</p> <p>16 into each box.</p> <p>17 Q. Okay, thank you.</p> <p>18 That is probably sufficient at the moment because</p> <p>19 the rest of it from 16 onwards concerns an associate of</p> <p>20 Mr Grainger, Colin Waters.</p> <p>21 A. Yes.</p> <p>22 Q. Is it fair to say that some of the information that you</p> <p>23 have in here is established or established fact, for</p> <p>24 example a PNC record of a conviction, caution or</p> <p>25 reprimand?</p> <p style="text-align: center;">Page 15</p>
<p>1 Q. The whole of that top box?</p> <p>2 A. The whole of the top box is OPUS.</p> <p>3 Q. Then the black box underneath it, which looks like</p> <p>4 a screen print?</p> <p>5 A. That is PNC.</p> <p>6 Q. The PNC, the black box?</p> <p>7 A. Yes.</p> <p>8 Q. What about the red writing underneath?</p> <p>9 A. That again was free text.</p> <p>10 Q. Sorry?</p> <p>11 A. That was free text; I have typed that.</p> <p>12 Q. Okay.</p> <p>13 A. Page 10 would just be Google Maps.</p> <p>14 Q. So the image at the top?</p> <p>15 A. The top image is Google Maps, the bottom one has come</p> <p>16 off from the Land Registry.</p> <p>17 Q. A map from the Land Registry, yes.</p> <p>18 A. Then again, all three of these pictures would be Google.</p> <p>19 THE CHAIRMAN: Are you talking about page 11 now?</p> <p>20 MR BEER: Page 11 now.</p> <p>21 A. Yes.</p> <p>22 Q. Then page 12?</p> <p>23 A. Page 12, this is an Experian, screen-shots from Experian</p> <p>24 and all of 13 and 14.</p> <p>25 Q. They are Experian as well?</p> <p style="text-align: center;">Page 14</p>	<p>1 A. Yes.</p> <p>2 Q. Yes. Other of the information has been through the</p> <p>3 5x5x5 system; is that right?</p> <p>4 A. Yes.</p> <p>5 Q. I think we can probably see an example of that at</p> <p>6 page 15. If we just turn up page 15, the thing we were</p> <p>7 just talking about, these three boxes that you pulled</p> <p>8 from OPUS, can you see it has a rating column, which</p> <p>9 should be redacted in our version?</p> <p>10 A. Yes.</p> <p>11 Q. But in the original there would be a rating there?</p> <p>12 A. Yes.</p> <p>13 Q. Which was the 5x5x5 --</p> <p>14 A. Yes.</p> <p>15 Q. -- is that right?</p> <p>16 It has already been graded in accordance with or</p> <p>17 pursuant to the national intelligence model?</p> <p>18 A. Yes.</p> <p>19 Q. What about if we go back, please, to page 9. Do you see</p> <p>20 the warning markers there in the red box?</p> <p>21 A. Yes.</p> <p>22 Q. They are not graded according to the 5x5x5 system, are</p> <p>23 they?</p> <p>24 A. No, they were held on PNC.</p> <p>25 Q. Yes. Even if the reason that they went on PNC in the</p> <p style="text-align: center;">Page 16</p>

1 first place was intelligence, as opposed to
 2 a conviction, do you understand?
 3 **A. Yes.**
 4 Q. Or if there were some warning markers in that box -- as
 5 there are with other subjects -- that were taken from
 6 OPUS, they had not gone through the 5x5x5 system either
 7 had they?
 8 **A. No.**
 9 Q. If we look back at page 8, please, at the free text,
 10 under "Risk assessment", where you say:
 11 "Grainger was born in Salford and is very well known
 12 within the Salford criminal element, particularly the
 13 cash in transit and armed robbery fraternity."
 14 That is not expressed as intelligence in a way that
 15 the 5x5x5 system is?
 16 **A. No.**
 17 Q. It is not graded in any way?
 18 **A. No.**
 19 Q. How is an officer receiving this supposed to treat it?
 20 **A. Just as an overview to the subjects.**
 21 Q. Is he supposed to treat it as accurate, reliable,
 22 possibly reliable, unreliable, very unreliable?
 23 **A. I don't know. I assumed he was receiving it --**
 24 Q. You wrote it, Ms Griffiths.
 25 **A. I did, but I wrote it for another operation.**

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1 Q. It doesn't matter what the operation is at the moment.
 2 **A. No, no, it is just my assessment of reading through all**
 3 **the intelligence rather than put every strand of**
 4 **intelligence in, it is an overview or an insight into**
 5 **associations and background, basically, that has been**
 6 **drawn from the OPUS record, the full OPUS record.**
 7 Q. We might hear some evidence, maybe even this afternoon,
 8 that all intelligence at this time was supposed to be
 9 analysed and disseminated in accordance with the
 10 national intelligence model. You were familiar with the
 11 national intelligence model?
 12 **A. Yes.**
 13 Q. Why is it that the boxes that we saw on page 15 have the
 14 conventional rating, grading, in accordance with NIM in
 15 them but this overview hasn't?
 16 **A. Because this is intelligence that has been submitted**
 17 **into the OPUS system by other officers, or from other**
 18 **means, other means and that was obviously just me**
 19 **summarising the --**
 20 Q. You can see the difficulty, can't you?
 21 **A. Yes, no, I can, yes, I can.**
 22 Q. On reflection, it might -- somebody reading this,
 23 particularly if it is under the heading "Risk
 24 assessment" be particularly impactful on somebody?
 25 **A. Yes, no, I agree.**

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1 Q. And it is not graded in the conventional way?
 2 **A. No.**
 3 Q. Okay.
 4 Then similarly, at page 9 in the bold red type, at
 5 the foot of the page:
 6 "Of note, whilst there are no specific markers on
 7 PNC or OPUS regarding firearms, Grainger has been
 8 charged in the past with this crime ... which is
 9 an armed robbery at a post office in Prestwich where
 10 a sawn-off shotgun was used. The result of the case it
 11 was ordered that it lie on the file for Grainger."
 12 Would you agree that that just rather hangs in the
 13 air there, somebody reading that would not know what to
 14 make of it?
 15 **A. I can't speak for what somebody else would take of it**
 16 **but --**
 17 Q. Yes, what are they supposed to take from it?
 18 **A. Just that he has been arrested and charged previously**
 19 **with a firearms offence -- an armed robbery in which**
 20 **firearms were used.**
 21 Q. We are going to come back to the substance of this in
 22 a moment, because I think we know that it was mistaken.
 23 **A. Yes.**
 24 Q. But what were you intending to convey from that entry?
 25 **A. Just that he had an association with a firearms offence.**

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1 Q. Again, that has not gone through the 5x5x5 system, has
 2 it?
 3 **A. It has come from a crime report.**
 4 Q. Yes, is that an answer then?
 5 **A. Well, no, a crime report wouldn't have a rating.**
 6 Q. But what you are doing is you are translating
 7 information from a crime report into an intelligence
 8 profile, a subject profile?
 9 **A. Yes. Yes.**
 10 Q. The user of it might need some help to understand how
 11 accurate or reliable the suggestion you are making is,
 12 might they?
 13 **A. Yes.**
 14 Q. But this entry doesn't give them that help, does it?
 15 **A. No.**
 16 Q. You have helped us already by saying that the subject
 17 profiles are created on a particular format, on
 18 a template and you populated information. If we can
 19 look at this profile as a whole, just so we can
 20 establish what it consisted of. If you look between
 21 pages 6 and 27, if we just hold those two together, is
 22 that the profile?
 23 **A. As I remember, yes.**
 24 Q. Okay, and then when we go on to page 28 and following,
 25 that is something different, isn't it, that is a crime

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<p>1 report for the crime we are going to look at?</p> <p>2 A. Yes.</p> <p>3 Q. That wasn't part of the profile?</p> <p>4 A. No.</p> <p>5 Q. Right, good.</p> <p>6 It is just that in the copying of the papers by the</p> <p>7 IPCC, they have bundled everything together and called</p> <p>8 it as a profile and I just wanted to establish, it is</p> <p>9 the document between pages 6 and 27, so it is 22 pages</p> <p>10 long.</p> <p>11 A. Yes.</p> <p>12 Q. Okay.</p> <p>13 If we remember what we are going to do now, we are</p> <p>14 just going to go through it, page 7, there is the</p> <p>15 photograph and the personal details and on to page 8,</p> <p>16 yes?</p> <p>17 A. Yes.</p> <p>18 Q. Then there is the free text, "Subject information", on</p> <p>19 page 8, yes?</p> <p>20 A. Yes.</p> <p>21 Q. Then there are some information from OPUS, the PNC and</p> <p>22 your further free text entry on page 9, yes?</p> <p>23 A. Yes.</p> <p>24 Q. Google Maps and Land Registry on page 10?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 21</p>	<p>1 A. No.</p> <p>2 Q. Why was that?</p> <p>3 A. Because we were all -- as you said at the beginning, we</p> <p>4 were not given any training, it was just that we did</p> <p>5 it -- we all had our own style to create an intelligence</p> <p>6 subject profile.</p> <p>7 Q. Right, I see.</p> <p>8 A. This must have been how Simon does his, DC Lapniewski.</p> <p>9 Q. Okay. It was earlier when you said there was a template</p> <p>10 that you populated, that was your own personal template?</p> <p>11 A. Yes, we all had our own templates.</p> <p>12 Q. Your own style?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Then do you see his first section, section 1, is</p> <p>15 "Personal details"?</p> <p>16 A. Yes.</p> <p>17 Q. Yes. You had a similar section, "Personal details",</p> <p>18 didn't you?</p> <p>19 A. Yes.</p> <p>20 Q. Then his section 2 is "Intelligence checks to inform any</p> <p>21 risk assessment"; can you see that?</p> <p>22 A. Yes.</p> <p>23 Q. Can you see he seems to have, and we will explore it</p> <p>24 with him, cut into this record in section 2 information</p> <p>25 on four things, they are in bold, underlined in capital</p> <p style="text-align: center;">Page 23</p>
<p>1 Q. Google Maps on page 11 and screen-shots from Experian on</p> <p>2 12, 13 and 14?</p> <p>3 A. Yes.</p> <p>4 Q. Some copied information from OPUS on 15 and on to 16?</p> <p>5 A. Yes.</p> <p>6 Q. Then information about Colin Waters from 16 to 27?</p> <p>7 A. Yes.</p> <p>8 Q. I just want to look please at the other bundle we had</p> <p>9 out, please, and compare it to Mr Totton's, Mr Rimmer's</p> <p>10 and Mr Corkovic's.</p> <p>11 If we look, please -- sir, it is your tab 1.</p> <p>12 THE CHAIRMAN: Thank you.</p> <p>13 MR BEER: It is in the Simon Lapniewski bundle at pages 9 to</p> <p>14 21, please.</p> <p>15 For other people that are following, this is F/33</p> <p>16 and following.</p> <p>17 We can see that the front page of the profile is,</p> <p>18 apart from its title, roughly the same, yes?</p> <p>19 A. Yes.</p> <p>20 Q. Then over the page at page 10, in Mr Totton's profile,</p> <p>21 created by DC Lapniewski, there is a contents section,</p> <p>22 sections 1 to 11?</p> <p>23 A. Yes.</p> <p>24 Q. Yes.</p> <p>25 That was not in your one?</p> <p style="text-align: center;">Page 22</p>	<p>1 letters, "Criminal use or possession of firearms",</p> <p>2 "Criminal use or possession of weapons", "Propensity to</p> <p>3 use violence" and "Propensity to use drugs".</p> <p>4 Can you see that on pages 11, 12 and 13?</p> <p>5 A. Yes.</p> <p>6 Q. What he has done is cut into the record intelligence</p> <p>7 from somewhere else?</p> <p>8 A. Yes.</p> <p>9 Q. Whereas what you have done on your "Subject information"</p> <p>10 is write some free text of what you interpreted the</p> <p>11 intelligence to mean?</p> <p>12 A. Yes.</p> <p>13 Q. Is that just a function of you each having a different</p> <p>14 way of doing the same job?</p> <p>15 A. Yes.</p> <p>16 Q. On page 14, please, you can see in his profile we have</p> <p>17 a section concerning the primary address of the subject.</p> <p>18 Whereas I think in yours, that was part of a section</p> <p>19 that was headed "Risk assessment", wasn't it?</p> <p>20 A. Yes, for subject information.</p> <p>21 Q. On his page 17, his section 4 is "Access to vehicles",</p> <p>22 yes?</p> <p>23 A. Yes.</p> <p>24 Q. I don't think you had an access to vehicles section, had</p> <p>25 you?</p> <p style="text-align: center;">Page 24</p>

<p>1 A. No.</p> <p>2 Q. His section 5 is "communications data", I don't think</p> <p>3 you had a section concerning communications data, had</p> <p>4 you?</p> <p>5 A. No.</p> <p>6 Q. His section 6 is "Social networking", so where he has</p> <p>7 checked social network sites, you didn't have one of</p> <p>8 those?</p> <p>9 A. No.</p> <p>10 Q. His section 7 is "Additional identification numbers" and</p> <p>11 I don't think you have that?</p> <p>12 A. No, but I do have the driving licence details, which is</p> <p>13 what --</p> <p>14 THE CHAIRMAN: You have the what details?</p> <p>15 A. The driving licence deals, which is what Simon has put.</p> <p>16 My profile does contain that on page 9.</p> <p>17 MR BEER: It has it there on page 9 --</p> <p>18 A. It is not set out like Simon's.</p> <p>19 Q. It is not set out, but the information is there, is it?</p> <p>20 A. Yes.</p> <p>21 Q. Then section 8, "Key associates" with photographs,</p> <p>22 I think you had a section concerning associates but</p> <p>23 I think yours just starts I think with the words on</p> <p>24 page 16, Colin Waters?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 25</p>	<p>1 thinking you were asking me about creating subject</p> <p>2 profiles, not specifically this one.</p> <p>3 Q. I am confused now.</p> <p>4 When we started out, I said that subject profiles,</p> <p>5 nominal profiles, pen pictures they were all the same</p> <p>6 thing, do we still agree on that.</p> <p>7 A. Yes, the front page is, yes.</p> <p>8 Q. I was not just talking about the front page, I was</p> <p>9 talking actually about the whole document.</p> <p>10 A. Whatever is contained on the front page, whether it says</p> <p>11 nominal, subject or pen profile is irrelevant. They</p> <p>12 are, it is the same kind of document. However, as</p> <p>13 I stated originally, we get given -- tasked with</p> <p>14 producing subject profiles for people of interest to</p> <p>15 a certain operations or, as is the case for this profile</p> <p>16 that I produced, I was the intelligence officer for</p> <p>17 Operation Samana which this was created for. So to</p> <p>18 compare one with another, if I was doing a subject</p> <p>19 profile, it would look more like this one --</p> <p>20 Q. Did you have --</p> <p>21 A. -- for Mr Totton.</p> <p>22 Q. Did you have a template like DC Lapniewski had then?</p> <p>23 A. They were available in the office.</p> <p>24 Q. No, had you got one?</p> <p>25 A. I couldn't tell you if I had one on my computer or not.</p> <p style="text-align: center;">Page 27</p>
<p>1 Q. Then his on page 20, looks, in section 9, at "Associated</p> <p>2 businesses"?</p> <p>3 A. Yes.</p> <p>4 Q. I don't think you have a section that was set aside for</p> <p>5 that, you have just cut in the Experian checks, haven't</p> <p>6 you?</p> <p>7 A. I haven't. Can I just say at this point, these two</p> <p>8 profiles were done for two different things. My -- this</p> <p>9 profile for Mr Totton is a profile for Mr Totton,</p> <p>10 a subject profile for him. My profile was a profile</p> <p>11 that was done in relation to an operation, so it wasn't</p> <p>12 just -- that is why my profile contains two subjects,</p> <p>13 because those were the two subjects of interest for the</p> <p>14 operation I was dealing with.</p> <p>15 Q. Right.</p> <p>16 A. So I wouldn't go into the length, I would only cover</p> <p>17 what was relevant for the operation. So it was more of</p> <p>18 an operational profile than a subject profile.</p> <p>19 Q. I thought we established at the beginning that they were</p> <p>20 exactly the same thing?</p> <p>21 A. The templates are, however the reason that they were</p> <p>22 produced are slightly different reasons.</p> <p>23 Q. I thought you didn't know the reason that they were</p> <p>24 produced and you went into it blind?</p> <p>25 A. Well I thought -- sorry, I was obviously confused, I was</p> <p style="text-align: center;">Page 26</p>	<p>1 We did have different -- we did have templates, but to</p> <p>2 be honest I couldn't tell you if I had one or ... if</p> <p>3 I needed one I could have got hold of one.</p> <p>4 Q. Your document is called "A pen picture relating to</p> <p>5 Anthony Grainger", not, "Intelligence for Operation</p> <p>6 Samana re two subjects", is it?</p> <p>7 A. No.</p> <p>8 Q. Wasn't this a pen picture relating to Anthony Grainger</p> <p>9 then? As it says on the tin?</p> <p>10 A. Well, yes -- that is what it says.</p> <p>11 Q. Was it though?</p> <p>12 A. It could have been easily that I just hadn't changed it,</p> <p>13 the title of it.</p> <p>14 Q. Changed it to what?</p> <p>15 A. To "A profile for Operation Samana".</p> <p>16 Q. What is a profile for Operation Samana, what does that</p> <p>17 mean?</p> <p>18 A. It is an operational -- it was a separate operation that</p> <p>19 is completely separate and happened months before --</p> <p>20 Q. I know.</p> <p>21 A. -- Shire, but that is what I was asked to produce this</p> <p>22 profile for.</p> <p>23 Q. Yes, we know that but what is a profile for</p> <p>24 an operation? What is it about?</p> <p>25 A. They would give me subjects relevant to that operation</p> <p style="text-align: center;">Page 28</p>

<p>1 that I would then produce subject profiles for, as 2 I have done here. 3 Q. This is a subject profile then -- 4 A. Yes, but it -- 5 Q. -- but it is about two people not one? 6 A. But it was specific to an operation, so didn't feel 7 there needed to be this level of depth involved. 8 Q. What do you mean it was specific to an operation? 9 A. It was for Operation Samana. 10 Q. But what relevance does that have? 11 A. That we didn't need to know if he had a Facebook page 12 or -- 13 Q. Why not? 14 A. Because it wasn't relevant. 15 Q. Did they tell you what was relevant and what was not 16 relevant beforehand? 17 A. Yes, we had had briefings. 18 Q. What did they tell you was relevant to include? 19 A. Well they didn't tell me what was relevant as such. 20 Q. What did you understand was relevant to include? 21 A. That we were looking into the two subjects of this 22 profile. 23 Q. For what purpose? 24 A. Where they -- where they worked, where they lived, the 25 home addresses, that kind of thing. I was asked to</p> <p style="text-align: center;">Page 29</p>	<p>1 was. It was just an overview. 2 Q. All of the things you are saying to the chairman now 3 tend to suggest that you tailor the profile that you 4 produce by reference to instructions that you are given 5 or the purpose for which the profile is to be put, do 6 you understand? 7 A. I did for that one, yes. 8 Q. Yes. 9 We said at the beginning -- 10 A. If I was just given a subject profile, it would look 11 more like, it would contain a lot more detail as per the 12 other profile, which is why they don't look alike. 13 Q. I was not holding a light up to yours -- 14 A. No. 15 Q. -- by reference to the Totton profile to show that yours 16 was defective in anyway, in case you were concerned 17 about that. 18 A. No, I appreciate that. No, no, I wasn't, I was just -- 19 at that point obviously there is not the level of depth 20 in mine, but that was because it was for a different 21 purpose. 22 Q. Okay. Can you express in a single sentence, please, the 23 purpose of your profile? 24 A. An intelligence overview for Operation Samana, on 25 Anthony Grainger and Colin Waters.</p> <p style="text-align: center;">Page 31</p>
<p>1 create it for a briefing. 2 Q. What kind of briefing? 3 A. It was between myself, the SIO, our detective inspector 4 and there was another intelligence officer there. 5 Q. What kind of briefing was it about, what was the purpose 6 of the briefing? 7 A. In relation to the nature of the work. 8 Q. I don't understand, I'm sorry. 9 A. In relation to the nature of their jobs, working in 10 a breakers' yard. 11 Q. You were attending, with the people you have described, 12 a briefing about the jobs of these two men in 13 a breakers' yard? 14 A. Of the -- which is why these pictures are included, the 15 Google, of the home addresses, obviously if there was 16 any arrest strategies that the SIO wanted to make and 17 the Vass North-west premises. 18 Q. Hold on, so it is a briefing where an arrest was 19 contemplated? 20 A. I don't remember if an arrest was contemplated. I was 21 asked to put this together in relation to ... 22 Q. We know you were asked to put it together. 23 A. Yes, I don't know what you want me to say. I can't 24 remember if it was discussed within that briefing 25 whether there was an arrest phase. I don't think it</p> <p style="text-align: center;">Page 30</p>	<p>1 Q. Why would that miss out things like their associates or 2 social media or financial and company assets, or 3 associated businesses? 4 A. They were -- the associates weren't relevant as there 5 were only believed -- they were the only two subjects of 6 Operation Samana, of relevance. 7 Q. Yes. Sorry, say again? 8 A. They were the only two of relevance to Operation Samana. 9 Q. Okay. I will move on. 10 If we continue in page 20 of DC Lapniewski's file, 11 can you see he continues with intelligence summary at 12 the end -- 13 A. Yes. 14 Q. -- and then an overview at the end. Can you see that on 15 page 21? 16 A. Yes. 17 Q. If you were preparing a subject profile, would you do 18 the same? 19 A. Very similar, we all have our own personal styles, 20 obviously but it would form -- as I say, they do come as 21 a template. 22 Q. Would yours conclude with this kind of narrative at the 23 end, where you maybe draw the threads together and 24 express your own personal views as to what the 25 intelligence shows?</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

1 **A. Potentially, yes, I have done that --**
 2 Q. That was quite a common practice?
 3 **A. Yes.**
 4 Q. Can we try and narrow down then the purpose for which
 5 you were creating this profile.
 6 If you go back to your witness statement, please,
 7 the first one, at page 1 do you see the second paragraph
 8 beginning, "On 20 September ..."
 9 **A. Yes.**
 10 Q. Which reads:
 11 "On 20 September 2011, whilst working with the FIB,
 12 I was undertaking my duties for Operation Samana which
 13 was a critical incident unrelated to Operation Shire and
 14 I had cause to create a subject profile for a male of
 15 interest to the operation. This subject was
 16 Anthony Grainger born on 26 January 1976, this profile
 17 was created as a risk assessment just prior to the
 18 arrest of Grainger."
 19 You say this profile was created as a risk
 20 assessment, what does that mean?
 21 **A. Obviously in that briefing then a decision had been made**
 22 **to arrest Grainger and that it was used on a whole as**
 23 **a risk for the SIO to make informed decisions in**
 24 **relation to an arrest.**
 25 Q. I am still not quite understanding. I think looking at

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1 this now, you can see that you perhaps did know that
 2 there was going to be an arrest; is that right?
 3 **A. Potentially, yes.**
 4 Q. You say, "This profile was created as a risk
 5 assessment", what does that mean?
 6 **A. It just means it is there for the SIO to make**
 7 **an informed decision --**
 8 Q. About?
 9 **A. -- in relation to an arrest phase.**
 10 Q. What kind of things?
 11 **A. What kind of things would the SIO consider?**
 12 Q. No, what kind of things would you consider to create
 13 a risk assessment?
 14 **A. Well, just as I have contained within the profile, the**
 15 **aerial views of any premises, those kind of things, the**
 16 **risk assessment is purely and simply in this instance,**
 17 **was the premises, the home addresses, surrounding areas,**
 18 **what was surrounding. Same with the work premises,**
 19 **which was a premises of interest.**
 20 Q. Does the fact that you are creating the profile as
 21 a risk assessment affect the contents of the profile in
 22 any way?
 23 **A. No.**
 24 Q. Did you know what Operation Samana was about when you
 25 were creating the profile?

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1 **A. Yes.**
 2 Q. What did you know about Operation Samana?
 3 **A. That it was the investigation into a burglary of a motor**
 4 **vehicle from a serving police officer and there was**
 5 **data, sensitive data, contained within a wallet that was**
 6 **taken at the time of this burglary.**
 7 Q. Did that knowledge of the subject matter of the
 8 operation influence the inclusion or the omission of any
 9 information in the profile?
 10 **A. No.**
 11 Q. You see here that you describe this, that this was
 12 a profile for a male, the male was Anthony Grainger?
 13 **A. Yes.**
 14 Q. Rather than the more generalised description you gave
 15 earlier, which was I think an intelligence overview for
 16 Operation Samana generally. It appears to suggest this
 17 was specifically a subject profile for Anthony Grainger,
 18 doesn't it?
 19 **A. At the time that I gave this statement, this was**
 20 **obviously post the incident with Operation Shire and**
 21 **I was aware that the statement was to ask me why I had**
 22 **created a profile that was specific to Grainger, so**
 23 **I think that is the way that I have worded my statement.**
 24 Q. Is that wrong then? The line --
 25 **A. It is right, but I have not included that it was -- to**

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1 **include Colin Waters, did I?**
 2 Q. But sorry to be picky about it, but --
 3 **A. Okay.**
 4 Q. -- you were saying that if you had created a subject
 5 profile for Anthony Grainger, it would look very
 6 different from the document that we have been looking
 7 at?
 8 **A. Yes.**
 9 Q. Whereas this does say, "I had cause to create a subject
 10 profile for Anthony Grainger".
 11 **A. Yes, it does.**
 12 Q. Is this wrong then?
 13 **A. It must be, yes.**
 14 Q. What should it say?
 15 **A. That I have created an operational profile for Operation**
 16 **Samana, or subject profiles for Anthony Grainger and**
 17 **Colin Waters, subject to Operation Samana.**
 18 Q. Was it known that a search warrant was going to be
 19 potentially executed at these premises when you were
 20 creating the profile?
 21 **A. Not when I was creating the profile.**
 22 Q. When you went to the briefing?
 23 **A. It was at the briefing, after the profile had been**
 24 **created.**
 25 Q. The other subject profiles that we have for Mr Totton,

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1 Mr Rimmer and the Corkovics do not include a risk
 2 assessment.
 3 **A. Okay.**
 4 Q. Why is it that your profile includes a risk assessment?
 5 **A. I couldn't tell you. It is just -- that is the way**
 6 **I have worded it. As I say, we all have our own**
 7 **styles --**
 8 Q. I am going to press you on that --
 9 **A. -- there is no set -- as far as I am aware, there was no**
 10 **set guidance as to how that kind of thing would be set**
 11 **out.**
 12 **In relation to that risk assessment, that is pretty**
 13 **much the same as Simon's overview on his last page.**
 14 **I have just put mine at the front.**
 15 Q. What risk were you assessing?
 16 **A. I have probably used the wrong wording there then,**
 17 **haven't I, in hindsight. It is an overview, isn't it,**
 18 **rather than a risk assessment.**
 19 **There isn't anything that I have said contained**
 20 **within there that implies a risk, does there, it is just**
 21 **an overview.**
 22 Q. It says that he is very well known for committing armed
 23 robberies and he was involved in an armed robbery where
 24 a sawn-off shotgun was used. That might suggest to some
 25 of us that --

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1 **A. I didn't say he was involved in armed robberies, it said**
 2 **that --**
 3 Q. You say, "He is very well known within the ..."
 4 **A. He is, "... well known within the Salford criminal**
 5 **element, particularly in the cash in transit armed**
 6 **robbery fraternity", I didn't say he was responsible for**
 7 **committing armed robberies.**
 8 Q. Does that say that he is not responsible for them?
 9 **A. No.**
 10 Q. What is the purpose of its inclusion then?
 11 **A. Just the links to the other nominals.**
 12 Q. Okay, so he is involved with people that do commit armed
 13 robberies?
 14 **A. Yes.**
 15 Q. That suggests he is a risk, doesn't it?
 16 **A. Well ...**
 17 Q. No?
 18 **A. Not to me at that point. I am not the person making any**
 19 **kind of decisions.**
 20 Q. Would you agree as a general proposition that in order
 21 for you to undertake a risk assessment, you must know
 22 the thing that you are assessing might happen?
 23 **A. Yes.**
 24 Q. What was the thing that you were assessing might happen?
 25 **A. It wasn't -- this is when I have said that I think that**

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1 **the wording "Risk assessment" should really have been,**
 2 **with hindsight looking at it now, should have said**
 3 **"Overview" rather than "Risk assessment".**
 4 Q. You were not aware I don't think when you created this
 5 subject profile that it might be provided to firearms
 6 teams?
 7 **A. I had no idea that this would go on to anywhere outside**
 8 **Operation Samana, no.**
 9 Q. Or be used to formulate threat assessments for firearms
 10 officers, you didn't know that?
 11 **A. No.**
 12 Q. Can I turn then in more detail to the contents of the
 13 subject profile and the mistake?
 14 **A. Hmm.**
 15 Q. Looking at it generally, if we look at page 8, it
 16 suggested that Mr Grainger worked for Colin Waters at
 17 a vehicle scrapyards as a recovery driver?
 18 **A. Yes.**
 19 Q. That is the middle of the risk assessment?
 20 **A. Yes.**
 21 Q. Then, if we can go to the bottom of page 9, please, the
 22 writing in red, this is all still under the heading
 23 "Risk assessment", isn't it?
 24 **A. It is all under "Subject information".**
 25 Q. Right, but under the subheading "Risk assessment"?

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1 **A. No.**
 2 Q. What is the red text in bold? What is --
 3 **A. That was in relation to the warning signals, so that is**
 4 **why the warnings is in red and then the text in red, not**
 5 **to highlight it for any other reason than, as I make**
 6 **note in there, there is no specific markers for**
 7 **firearms, however he had been charged in the past with**
 8 **a certain crime which is dated 1995, which was an armed**
 9 **robbery at a post office in Prestwich where a sawn-off**
 10 **shotgun was used.**
 11 Q. Was the purpose of the inclusion of the text in bold and
 12 red, and the content of the text in bold and in red, to
 13 suggest to officers reading it that Anthony Grainger
 14 might be armed when they came across him?
 15 **A. No, it was to say that he had previously been involved**
 16 **in a firearms incident, he had been charged with that**
 17 **crime, which he had.**
 18 Q. Why did you start the sentence, "Whilst there are no
 19 specific markers on PNC or OPUS regarding firearms,
 20 Grainger has been charged in the past ..."
 21 Do you see the way it is worded?
 22 **A. Yes, I do, yes. I could have just started there, I know**
 23 **couldn't I? I could have dropped the "whilst", but ...**
 24 Q. Is that not intended to be a clue to the officers,
 25 "Look, there are not any firearms markers but you should

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1 know that he has been charged in the past with
 2 committing a robbery where a sawn-off shotgun was used"?
 3 **A. Well, it is intimating that he is associated with people**
 4 **who have had access to firearms.**
 5 Q. Sorry?
 6 **A. It is intimating that he has had associations --**
 7 Q. No, this one is saying that he has been charged?
 8 **A. He had been charged with that crime.**
 9 Q. We will come in a moment and we will find out that he
 10 hadn't.
 11 **A. Right.**
 12 Q. He had not even been charged with it, but we will come
 13 to that in a moment.
 14 **A. Right.**
 15 Q. Are you not trying to drop a hint to officers here,
 16 "Look out, he might be armed"? Isn't that --
 17 **A. I was not trying to do anything.**
 18 Q. -- the purpose of this?
 19 **A. No.**
 20 Q. Reading that text as a whole, you say:
 21 "Of note, whilst there are no specific markers on
 22 PNC or OPUS regarding firearms, Grainger has been
 23 charged in the past with CR 243085B/95 ..."
 24 Stopping there, that is a crime reference number?
 25 **A. Yes.**

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1 Q. "... which is an armed robbery at a Post Office in
 2 Prestwich where a sawn-off shotgun was used. The result
 3 of this case was that it was ordered to lie on the file
 4 for Anthony Grainger."
 5 If we can first look, please at the crime report,
 6 for that crime, it starts at page 28.
 7 **A. Yes.**
 8 Q. Can you see in the top left of the crime report on
 9 page 28, this is G2/1251 for those that are following,
 10 the number 243085B/95?
 11 **A. Yes.**
 12 Q. We are dealing with the crime that you are referring to?
 13 **A. Yes.**
 14 Q. Okay.
 15 Then, if we go over the page to page 31, we can see
 16 under offender details, five people listed,
 17 Peter Anderson, Stuart Ellis, Anthony Grainger,
 18 Stuart Grainger and David Totton, yes?
 19 **A. Yes.**
 20 Q. Against Anthony Grainger, we can see in the right-hand
 21 column under "Court results", nothing appears?
 22 **A. Yes.**
 23 Q. But for Stuart Grainger we can see it says, "Appeared
 24 for one offence and this offence ordered to remain on
 25 file, not to be proceeded without leave of the court",

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1 yes?
 2 **A. Yes.**
 3 Q. I think in your witness statement you say that the
 4 mistake you made was reading Stuart Grainger's entry as
 5 if it applied to Anthony Grainger?
 6 **A. Yes.**
 7 Q. So you have transposed two columns?
 8 **A. Yes, two lines.**
 9 Q. That was the mistake that you were --
 10 **A. That was my mistake. It wasn't a mistake on any other**
 11 **system, it was a mistake I made.**
 12 Q. You candidly confessed up to that?
 13 **A. Yes.**
 14 Q. Right, I am going to look to see whether that was the
 15 right confession, okay?
 16 **A. Right.**
 17 Q. Can we look, please, and do some marrying up first.
 18 This is going to be quite tricky.
 19 **A. Okay.**
 20 Q. Can we take out file G2, which is behind you over your
 21 left shoulder, at page 1167.
 22 THE CHAIRMAN: Page?
 23 MR BEER: 1167.
 24 THE CHAIRMAN: 1167.
 25 MR BEER: I am going to actually ask you, rather unusually,

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1 to take this out of the bundle otherwise it is going to
 2 get too difficult, between pages 1167 and 1168C.
 3 For other core participants, the three pages of the
 4 indictment that have been missed out should have been on
 5 their desks.
 6 Sorry, right up to 1169 as well, please.
 7 **A. Right.**
 8 Q. You should have: 1167; 1168; 1168A; 1168B; on the
 9 reverse of 1168B, 1168C; and then 1169?
 10 **A. Yes.**
 11 Q. Five bits of paper. If you just hold those in one hand
 12 and I am going to try and compare these against the
 13 court result sheets, the indictment.
 14 If we look to start with at count 1 on the
 15 indictment. Do you see count 1 on the indictment is
 16 a robbery, it is a substantive offence of robbery
 17 against Peter Anderson only on 9 October 1995. Yes? If
 18 we just note the date there, 9 October 1995.
 19 **A. Hmm.**
 20 Q. And then in our G bundle, go to a court results sheet,
 21 please, at 1163. If you just started at 1161, first,
 22 you will see this is a court results sheet for
 23 Peter Anderson. Do you see that? Top left?
 24 **A. Yes.**
 25 Q. Then if you go over, to 1163, do you see where it says,

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<p>1 "1 of 1: robbery"?</p> <p>2 A. Yes.</p> <p>3 Q. "Plea not guilty, verdict not guilty by jury on judge's</p> <p>4 direction. 10 June 1997, defendant discharged,</p> <p>5 defendant's costs order."</p> <p>6 A. Yes.</p> <p>7 Q. Against my indictment I have written, "Not guilty on</p> <p>8 judge's direction, defendant's costs order".</p> <p>9 That was Peter Anderson alone acquitted of that</p> <p>10 offence?</p> <p>11 A. Yes.</p> <p>12 Q. On our indictment, if we could go to count 2, please, we</p> <p>13 should see that this is a substantive offence -- it is</p> <p>14 an attempt -- alleged to have been committed by</p> <p>15 Stuart Grainger on 14 November 1995, can you see that?</p> <p>16 A. Yes.</p> <p>17 Q. Note the date, that is 14 November 1995 and then if we</p> <p>18 could look please at his court results sheet, which</p> <p>19 starts at 1152.</p> <p>20 A. Yes.</p> <p>21 Q. Can you see for attempted robbery on 1154?</p> <p>22 A. Yes.</p> <p>23 Q. It says, "Count ordered to remain on file, not to be</p> <p>24 proceeded with without the leave of the court or the</p> <p>25 Court of Appeal"?</p> <p style="text-align: center;">Page 45</p>	<p>1 Count 4, please.</p> <p>2 A. Yes.</p> <p>3 Q. You will see that that is a robbery substantive offence</p> <p>4 alleged against four people, David Totton,</p> <p>5 Anthony Grainger, Stuart Ellis and Peter Anderson --</p> <p>6 A. Yes.</p> <p>7 Q. -- on 10 June 1996, so that is against everyone apart</p> <p>8 from Stuart Grainger. Then just going through those</p> <p>9 four men. Mr Ellis, please, at 1157:</p> <p>10 "Not guilty on judge's direction."</p> <p>11 Mr Anderson, 1163, the second one that is listed</p> <p>12 there:</p> <p>13 "Not guilty on judge's direction."</p> <p>14 A. Yes.</p> <p>15 Q. Mr Totton, 1166, the second one listed there:</p> <p>16 "Not guilty on judge's direction."</p> <p>17 Then, finally, Mr Grainger, at 1160, the second one</p> <p>18 listed there:</p> <p>19 "Robbery: not guilty on judge's direction."</p> <p>20 A. Yes.</p> <p>21 Q. So far I think we have a complete set of allegations on</p> <p>22 the indictment with all of the court result sheets</p> <p>23 relating to each allegation on the indictment, do you</p> <p>24 follow?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 47</p>
<p>1 A. Yes.</p> <p>2 Q. That is the one that has been ordered to lay on the</p> <p>3 file?</p> <p>4 A. Yes.</p> <p>5 Q. Attempted robbery against Stuart Grainger on</p> <p>6 14 November 1995. Do you have it?</p> <p>7 A. Yes.</p> <p>8 Q. Then if we go to count 3 on our indictment, please,</p> <p>9 a conspiracy to rob, alleged against David Totton and</p> <p>10 Anthony Grainger on 31 May 1996. If we can go, please,</p> <p>11 to Anthony Grainger's court results, at 1158. Then the</p> <p>12 court result sheet at 1160:</p> <p>13 "Conspiracy to rob, not guilty by jury on judge's</p> <p>14 direction, defendant discharged. Defendant's costs</p> <p>15 order."</p> <p>16 Do you have that?</p> <p>17 A. Yes.</p> <p>18 Q. That was count 3, the first one.</p> <p>19 Then for David Totton, if we go to 1164, and then</p> <p>20 his court results sheet at 1166, exactly the same,</p> <p>21 "Conspiracy to rob, not guilty by jury on judge's</p> <p>22 direction, defendant's costs order."</p> <p>23 Yes --</p> <p>24 A. Yes.</p> <p>25 Q. -- for count 3?</p> <p style="text-align: center;">Page 46</p>	<p>1 Q. I want to see where the allegation that you included in</p> <p>2 the subject profile fits in with all of that.</p> <p>3 If we go back to the crime reference number, that</p> <p>4 was CR 43085B/95, yes?</p> <p>5 The crime report, which is in your witness file, at</p> <p>6 page 28, are we all there?</p> <p>7 A. Yes.</p> <p>8 Q. With the same crime reference number, shows that the</p> <p>9 offence was alleged to have been committed on</p> <p>10 9 October 1995.</p> <p>11 A. Yes.</p> <p>12 Q. Can you see that, 9 October 1995?</p> <p>13 A. Yes.</p> <p>14 Q. Do you remember when I asked you to hold the date of</p> <p>15 9 October 1995 in your mind when we were looking at the</p> <p>16 indictment?</p> <p>17 A. Yes.</p> <p>18 Q. Sorry, I will just wait for the chairman to catch up.</p> <p>19 THE CHAIRMAN: Yes.</p> <p>20 MR BEER: Can we go back to the indictment then, which we</p> <p>21 have taken out of the folder, and we can see that the</p> <p>22 allegation in count 1 is 9 October 1995?</p> <p>23 A. Yes.</p> <p>24 Q. This is the same date, yes?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 48</p>

<p>1 Q. It shows I think that only Peter Anderson was -- the 2 allegation was only made against Peter Anderson, neither 3 Anthony Grainger nor Stuart Grainger? 4 A. No. 5 Q. I think it follows that this allegation was neither 6 ordered to lie on the file against either 7 Anthony Grainger or Stuart Grainger? 8 A. No. 9 Q. The allegation that was ordered to lie on the file 10 against Stuart Grainger was something entirely 11 different, that was count 2? 12 A. Yes. Yes. 13 Q. The entry at the bottom of page 9 of the witness bundle, 14 page 9 of the witness bundle -- 15 A. Yes. 16 Q. -- that entry that you included on the bottom there is 17 not wrong because it says the offence was ordered to lie 18 on the file against Anthony Grainger, whereas in fact it 19 should have said Stuart Grainger, it is wrong because 20 this was not a matter that was alleged at court at all 21 against either Stuart Grainger or Anthony Grainger? 22 A. No. 23 Q. But Peter Anderson? 24 A. Yes. 25 Q. That is why I said earlier that the frank admission that</p> <p style="text-align: center;">Page 49</p>	<p>1 A. Yes. 2 Q. At page 3 of the bundle, which is the witness statement 3 of 3 October 2013, you say in the end of the second 4 paragraph: 5 "I made mention that the result of that matter was 6 that it was ordered to lie on the file for 7 Anthony Grainger. I have since been made aware that 8 this was not the case. I am now aware that it was 9 actually Stuart Grainger, Anthony Grainger's brother, 10 who it was ordered for that matter to lie on file 11 against." 12 I think. 13 A. Yes. 14 Q. "Anthony Grainger, together with others, were all shown 15 on the crime which I was referring to as being charged 16 with that offence." 17 Then your last witness statement, if we go forward 18 to page 5B, that is the witness statement of 19 30 October 2014, on the second page of it, three 20 paragraphs down, you say: 21 "I have been asked how I made the mistake in the 22 Anthony Grainger profile of wrongly linking him to 23 a case lying on file, which he had been charged with 24 when in fact it should have been attributed to his 25 brother, the mistake was I misread the court result on</p> <p style="text-align: center;">Page 51</p>
<p>1 you had made -- 2 A. No, I appreciate that, I am quite happy to say that that 3 is wrong based on what I have just seen. 4 Q. But it is wrong for a different reason than you had 5 admitted to the IPCC? 6 A. Yes, but I was not aware of that until now, until I have 7 seen this. 8 MR BEER: I want to try and explore how that may have come 9 about. 10 I don't know whether that is a convenient moment, 11 sir? 12 THE CHAIRMAN: Thank you, we will take -- how are we doing 13 in terms of your anticipated progress -- just to measure 14 the length of the break. 15 MR BEER: We will finish the witness by lunchtime, sir, 16 I think that was the plan. 17 THE CHAIRMAN: 10-minute break, all right? 18 MR BEER: Yes, sir, thank you. 19 THE CHAIRMAN: 10-minute break. 20 (11.44 am) 21 (A short adjournment) 22 (11.55 am) 23 MR BEER: Sir, thank you. 24 Can we just go back to your witness statement, 25 please, Ms Griffiths.</p> <p style="text-align: center;">Page 50</p>	<p>1 a crime report ..." 2 A. Yes. 3 Q. "... I produce the crime report as an exhibit, the 4 mistake was not in the document but me misreading it." 5 Yes? 6 A. Yes. 7 Q. That was the admission that you were making? 8 A. Yes. 9 Q. If we go forward to the crime report at page 31. 10 A. Yes. 11 Q. As we said at the outset that the mistake that you were 12 saying that you had made was transposing the information 13 in Anthony Grainger's column, or row, against the 14 information in Stuart Grainger's row at the end, yes? 15 A. Yes. 16 Q. In fact, the information in Stuart Grainger's row should 17 not have been there at all? 18 A. No. 19 Q. Because he hadn't -- that allegation had not been 20 ordered to lie on the file against him at all? 21 A. For that offence, no. 22 Q. So there is in fact a mistake in the crime report as 23 well? 24 A. Yes. 25 Q. Does it follow that this page of the crime report should</p> <p style="text-align: center;">Page 52</p>

1 only really show Peter Anderson --
 2 **A. Yes.**
 3 Q. -- and that the other four people, Stuart Ellis,
 4 Anthony Grainger, Stuart Grainger and David Totton
 5 should not appear on there at all?
 6 **A. Having seen what I have just seen, yes, I would agree**
 7 **with you. Yes.**
 8 Q. All right, okay.
 9 You did make a mistake but were making a mistake by
 10 reference to a document that was itself mistaken?
 11 **A. Yes.**
 12 Q. Okay.
 13 When were you first aware of your mistake, the one
 14 that you were admitting?
 15 **A. The one in my statement, to lie on file?**
 16 Q. Yes.
 17 **A. I received a phone call from DI Shackleton, who asked of**
 18 **me specifically in relation to that, and I think it must**
 19 **have come from the IPCC looking through things, but**
 20 **I was made aware -- I was oblivious until that point.**
 21 Q. Just to be clear then, it was after the death of
 22 Mr Grainger and not before it?
 23 **A. Oh yes, no, no.**
 24 Q. Can I turn then to a slightly different topic, please,
 25 warning markers.

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1 Where did you obtain information about the presence
 2 of warning markers from?
 3 **A. The PNC and OPUS.**
 4 Q. Here we know that warning markers on the PNC against
 5 Mr Grainger were violence, drugs and drugs?
 6 **A. Yes.**
 7 Q. Not weapons?
 8 **A. No.**
 9 Q. OPUS was violence and weapons, but not drugs.
 10 Shall we just track that through so we can see it
 11 on --
 12 **A. I don't think I've got OPUS warning signals in my -- in**
 13 **this profile, have I?**
 14 Q. We will look at the PNC first, in your bundle at
 15 page 167, this is the PNC record for Anthony Grainger.
 16 For those following, it is F/1048. The PNC record for
 17 Anthony Grainger, do we see -- they seem to have
 18 disappeared, the warning signals.
 19 Yes, sorry, top of 169.
 20 **A. 169, thank you.**
 21 Q. Top of 169. There are three warning signals, violence,
 22 drugs, and drugs?
 23 **A. Yes.**
 24 Q. Yes? Not weapons?
 25 **A. No.**

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1 Q. Then if you just keep a finger in that and look at OPUS,
 2 that is back, or it starts back on 114.
 3 **A. Yes.**
 4 Q. Can you see in the box "OPUS warnings"?
 5 **A. Yes.**
 6 Q. It says:
 7 "GMPics warnings include commits offences on bail,
 8 violent, weapon, radio scanner, subject is a group 1
 9 offender."
 10 **A. Yes.**
 11 Q. Relevantly for us, violence and weapons but no drugs?
 12 **A. Yes.**
 13 Q. Here in your subject profile, you only included the PNC
 14 warning markers on the profile --
 15 **A. Yes.**
 16 Q. -- and not the weapons marker that appeared on OPUS?
 17 **A. Yes.**
 18 Q. Why?
 19 **A. Because to me the warning signs that are on PNC are**
 20 **generally link to antecedents, whereas what is on OPUS**
 21 **is subjective to -- officers can add warning signs on to**
 22 **OPUS, because they are linked to intelligence not**
 23 **crimes.**
 24 Q. Okay, so you understood the warnings on PNC to be,
 25 putting it in a very broad phrase --

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1 **A. More sound.**
 2 Q. More sound, thank you. More reliable?
 3 **A. Yes, more reliable than OPUS.**
 4 Q. Is that because you understood that the signals on PNC
 5 were conviction based not intelligence based?
 6 **A. Yes.**
 7 Q. If I said to you in fact the warning signals on PNC are
 8 both intelligence based and conviction based, that would
 9 be news to you?
 10 **A. No, it wouldn't, no, in fairness, having worked within**
 11 **a custody environment. If somebody is found with drugs**
 12 **on entrance to custody, it doesn't necessarily mean they**
 13 **get charged with that but a warning marker would be put,**
 14 **would have to go on PNC for drugs, so yes.**
 15 Q. You do know that warnings can appear on there, even if
 16 they don't result in a conviction?
 17 **A. Yes.**
 18 Q. Why do you mainly use the PNC then?
 19 **A. I just find the PNC more reliable, I don't -- I haven't**
 20 **got a reason for it, I just --**
 21 Q. What do you do? Here we can see that, for Mr Grainger
 22 there was violence and drugs on the PNC, no weapons. On
 23 OPUS there was violence and weapons but no drugs, what
 24 are you supposed to do for warning markers, do you
 25 aggregate them or put all of them down?

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1 **A. Do we know when these warning signs have gone on?**
 2 Q. Sorry.
 3 **A. Were these warning signs on at the time that I created**
 4 **my profile.**
 5 Q. We understand them to have been, yes.
 6 **A. Sorry, what was your question?**
 7 Q. Yes, where you have one record that says he has two
 8 things, you have got another one who says --
 9 **A. Another two different ones.**
 10 Q. -- he has two things and one of each of them doesn't
 11 match the other --
 12 **A. In theory --**
 13 Q. -- do you put three on?
 14 **A. In theory I should have put four on -- yes, I should**
 15 **have put them all on.**
 16 Q. Just help us as to why you didn't?
 17 **A. I couldn't tell you. I couldn't answer that, honestly,**
 18 **I don't know why it is not, whether it is an oversight**
 19 **or --**
 20 Q. Would you normally look at both OPUS and PNC and
 21 aggregate the entries?
 22 **A. Well, yes. Yes.**
 23 Q. In relation to the PNC on page 169, we can see that it
 24 shows the occurrence for which the warning marker was
 25 included.

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1 **A. Yes.**
 2 Q. For the violent warning marker, it says affray and the
 3 occurrence was on 4 December 1997, yes?
 4 **A. Yes.**
 5 Q. When you completed your subject profile, if we go back
 6 to that, and look at the warning marker, page 9, please.
 7 **A. Yes.**
 8 Q. That is F/14 for those that are following, you can see
 9 that where you have put the warning marker in on page 9,
 10 you have put, "VI [for violent], affray 4-12-1997", yes?
 11 **A. Yes.**
 12 Q. You have included the same information, both the offence
 13 and the date --
 14 **A. The date.**
 15 Q. -- of it, on there?
 16 **A. Yes.**
 17 Q. What do you understand the purpose of retaining the link
 18 on the PNC to the offence and its date to be?
 19 **A. Well I am assuming it would be linked to some kind of**
 20 **weed date.**
 21 Q. Okay, and the purpose of you including on your subject
 22 profile the offence and the date?
 23 **A. It is to show that that is an historic marker, although**
 24 **the marker still exists against Mr Grainger's PNC.**
 25 Q. So it is to show its age or antiquity?

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1 **A. Yes.**
 2 Q. What about put putting the offence, why did you include
 3 that?
 4 **A. There is different levels of violence, isn't there?**
 5 Q. Yes.
 6 **A. So it just gives an indication of somebody making**
 7 **an informed decision what the level of violence -- you**
 8 **could have a violent marker for a minor assault,**
 9 **couldn't you, or a violent marker for murdering**
 10 **somebody, so you know it is a vast -- which is why**
 11 **I would put the offence down.**
 12 Q. It would give some clue to those that are reading it
 13 what kind of violence --
 14 **A. What level of violence was used.**
 15 Q. -- it is on there for?
 16 **A. Yes.**
 17 Q. You have got age and type of offence to help the reader
 18 understand?
 19 **A. Yes.**
 20 Q. Was there any obligation on you to research any of the
 21 underlying material before including the marker on the
 22 profile?
 23 **A. No.**
 24 Q. You understood your obligation just to be to look at PNC
 25 and OPUS --

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1 **A. If it is on PNC, it is in the profile.**
 2 Q. If it is on PNC it goes on the profile, if it is on OPUS
 3 it goes on the profile, almost automatically?
 4 **A. Yes.**
 5 Q. All right.
 6 I think we have established that you understood that
 7 warning markers could be placed on the PNC in relation
 8 to matters for which the subject had not been convicted
 9 and that is because they first go on when the subject is
 10 arrested.
 11 **A. Yes.**
 12 Q. Subsequent events, whether the subject is charged or not
 13 and if charged whether convicted or acquitted, are
 14 irrelevant to whether the entry went on the PNC --
 15 **A. Yes.**
 16 Q. -- but might be relevant to retention?
 17 **A. Yes.**
 18 Q. I think you have accepted, rightly, that a warning
 19 marker can be there for a wide range of offending, or
 20 alleged offending, including an unsubstantiated
 21 suspicion of a slap or a punch at one end of the scale,
 22 right up, as you have said, to murder at the other?
 23 **A. Yes.**
 24 Q. What would you expect a reader of your subject profile
 25 to do when they read these warning markers? Would you

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1 expect them to track back and look at the underlying
 2 information?
 3 **A. It would depend how relevant -- for me it would depend**
 4 **how relevant the marker is to what they are**
 5 **investigating. For me, if you are asking me personally,**
 6 **I see these as what they are, a warning. It is not**
 7 **a conviction, it is not -- it is a warning that**
 8 **predominantly is used when police stop and search people**
 9 **in the street, they get given a warning that potentially**
 10 **this person may, you know, could be violent, it is just**
 11 **a warning. It is not used for anything specific and if**
 12 **you wanted to use it for something specific I would**
 13 **expect more research to be done into what it was**
 14 **contained for, what it was held against.**
 15 Q. Yes. So on the PNC, the warning markers are there for
 16 front line officers in operational situations where they
 17 come across people that they don't know and they want to
 18 know some, a ready reckoner of information about them,
 19 is that fair?
 20 **A. Yes. Yes.**
 21 Q. You have gone an extra step and included a bit of
 22 clarification --
 23 **A. Yes.**
 24 Q. -- by way of offence and date?
 25 **A. And date.**

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1 Q. Were you trained to do that?
 2 **A. I wasn't trained -- do you mean within this process,**
 3 **within the creation of a profile?**
 4 Q. Yes.
 5 **A. I was not trained to do that, prior to being a police**
 6 **officer I was a radio dispatcher, so I was trained**
 7 **therefore to tell them whether -- I would personally as**
 8 **a radio operator, if a police officer PNCed a body,**
 9 **I would tell them that there was a mark warning sign for**
 10 **Victoria India, but it dates from 1997 from an affray**
 11 **and that is what I would tell them because that is what**
 12 **is contained on PNC. And so potentially I have brought**
 13 **that maybe with me from a radio operator, a previous job**
 14 **within GMP, and I would contain it because for me it is**
 15 **relevant.**
 16 Q. Yes, the only reason for asking is if we look, and here
 17 I am holding a light up against DC Lapniewski's profile
 18 for David Totton, by reference to yours, if we look at
 19 Mr Totton's profile, it is the Lapniewski bundle --
 20 **A. Sorry I think it is over here.**
 21 Q. If you just push the tabs down on it, thank you.
 22 Your bundle, tab 1, sir, at page 11.
 23 THE CHAIRMAN: Thank you.
 24 MR BEER: Page 11. For those that are following, it is
 25 F/35.

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1 Can you see on page 11, he has put down:
 2 "Warning markers PNC/OPUS, OPUS firearms violent
 3 weapon, PNC weapons violent."
 4 He hasn't given the dates or the alleged offending
 5 there.
 6 Is it fair to say there wasn't, as far as you know,
 7 an uniform practice across FIB on this?
 8 **A. No, there was no training, it was just --**
 9 Q. Do what you want to do, yes?
 10 **A. Yes, your own judgment call I suppose.**
 11 Q. You said that for maybe a front line officer on the
 12 street, where you are the dispatcher and you are calling
 13 down the radio, "He has got Victoria India for an affray
 14 in 1997, beware", or whatever words you might use, that
 15 would be sufficient?
 16 **A. It would be for the officer to gauge, wouldn't it, and**
 17 **the demeanour of the person that they are dealing with.**
 18 Q. Yes. Where, by contrast, the person to whom the
 19 information is provided is an investigating officer --
 20 **A. Yes.**
 21 Q. -- and they have a number of months to research
 22 a profile --
 23 **A. Yes.**
 24 Q. -- would you expect them to look in the subset
 25 information?

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1 **A. Yes, I would.**
 2 Q. What about if firearms officers were being briefed up on
 3 the basis of your inclusion of warning markers? I know
 4 you didn't intend for that to happen.
 5 **A. No, I didn't intend, if it was used for that purpose,**
 6 **which I don't know if it was or not, then I would have**
 7 **expected -- to be honest, profiles of this nature, both**
 8 **DC Lapniewski's and myself, are created as a foundation**
 9 **to an operation not the crux of it, that it should be**
 10 **developed from there. And we wouldn't contain**
 11 **everything within a subject profile because you would**
 12 **pass it to the officer in the case and they would then**
 13 **develop what you have given them. Ie I would expect**
 14 **them to look into these warning signals more in depth.**
 15 **Likewise with potentially any antecedents or anything**
 16 **that they deem relevant to their job, to what they were**
 17 **investigating.**
 18 **That is what I would expect and I would expect the**
 19 **briefing to be done with the firearms if it gets to the**
 20 **fruition of an operation to be done from a completely**
 21 **different document, not this one.**
 22 Q. So --
 23 **A. I would expect a bespoke one for firearms.**
 24 Q. In short, you would expect the foundations to be built
 25 on?

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1 **A. Yes. To be moved on from there. That is just what**
 2 **I would expect. I don't know what is provided, but**
 3 **I would expect if something that was going to go down to**
 4 **the firearms, to brief firearms officers, it would be**
 5 **bespoke in relation to their remit and not as general as**
 6 **this.**
 7 Q. Thank you.
 8 Can I look at some other information that was
 9 available, that was not included in the subject profile.
 10 **A. Yes.**
 11 Q. Can we start, please, with the information on OPUS. In
 12 your bundle, at pages 137 and 138. Which for those
 13 following, should be F/995 and following.
 14 Can you see on pages 137 and 138 a list of crimes on
 15 137? Can you see that?
 16 **A. Yes.**
 17 Q. Which I think goes on to 138 and indeed I think 139
 18 and --
 19 **A. 140.**
 20 Q. -- right up to 146, yes?
 21 **A. Yes.**
 22 Q. Then on 147 there is a list of offences?
 23 **A. Yes.**
 24 Q. Just to start with, can you explain what this means, to
 25 start with the crimes, what does this huge long list of

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1 crimes mean?
 2 **A. It means to me that for each of these crime numbers, for**
 3 **which you are able to take a link through to the crime,**
 4 **Anthony Grainger's been associated to that crime as**
 5 **a nominal --**
 6 Q. Thank you.
 7 **A. -- of interest, either accused but it tells you what the**
 8 **status is at the side, "Accused", "Eliminated", on the**
 9 **right-hand side of the page, as to the crime status.**
 10 Q. It is associated in some way to that list of crime
 11 reports?
 12 **A. Yes.**
 13 Q. Yes.
 14 The nature of the association being in the status
 15 column?
 16 **A. Yes.**
 17 Q. Yes.
 18 **A. For me, I would -- looking at this, whilst they are all**
 19 **listed individually, there is quite a lot of crimes from**
 20 **1994 in relation to theft of motor vehicles which would**
 21 **probably be dealt with as a whole as a conspiracy.**
 22 Q. Right.
 23 **A. You know, it looks a lot, but --**
 24 Q. As I think they were, they were done as TICs I think?
 25 **A. Yes, TICs, however, but I will not read that and think**

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1 **he was responsible individually for every individual**
 2 **crime, if you see what I mean, arrested separately and**
 3 **dealt with.**
 4 Q. Look at "Offences" at 147, what does that page mean?
 5 **A. That is the category of the offence, isn't it, the**
 6 **offence type.**
 7 Q. But which offence?
 8 **A. Well -- he has been arrested for a wounding with intent**
 9 **I would suggest on 7 January 2002, although -- then it**
 10 **gives you the officer's collar number that dealt with**
 11 **it.**
 12 Q. Okay.
 13 **A. It just means he has been associated to those offences**
 14 **in some way.**
 15 Q. Right. Can I explore some of them. If we go back to
 16 pages 137 and 138, I think we can see on 137 and 138,
 17 and they are in reverse date order -- with 137
 18 being January 2008, and 138 ending in June 1994 -- I can
 19 see 15 separate crime numbers with the word "Robbery"
 20 written against them?
 21 **A. Hmm.**
 22 Q. Can we just go through them. On page 137, second row,
 23 yes?
 24 **A. Yes.**
 25 Q. I have called it number 1, bottom row, I have called

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1 number 2, yes?
 2 **A. Yes.**
 3 Q. Then over the page, the first four rows, 3, 4, 5 and 6?
 4 **A. Yes.**
 5 Q. Miss two rows is robbery number 7?
 6 **A. Yes.**
 7 Q. Miss a row, then there is robbery number 8?
 8 **A. Yes.**
 9 Q. Miss two rows, there is robberies 9, 10 and 11?
 10 **A. Yes.**
 11 Q. Miss a row, I think there is 12 and 13?
 12 **A. Yes.**
 13 Q. Miss a row, 14 and 15?
 14 **A. Yes.**
 15 Q. In fact there are two more.
 16 THE CHAIRMAN: Yes.
 17 MR BEER: At the bottom there is 16 and 17.
 18 **A. Yes.**
 19 Q. Thank you.
 20 We know about one of those, I think, because we have
 21 looked at it already. Do you see the one that is five
 22 lines up, sorry four lines up from the bottom of 138,
 23 "Crime reference 243085B of 1995".
 24 **A. Yes.**
 25 Q. We know about that don't we because that is the robbery

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1 you did include on the subject profile?
 2 **A. Yes.**
 3 Q. Just as a general question then, to start with, why
 4 didn't you include on the subject profile any of the 16
 5 others?
 6 **A. I genuinely cannot remember. Whether or not there**
 7 **wasn't a firearm used in those other robberies, I don't**
 8 **know, I would be guessing to be fair.**
 9 Q. You cannot recall now?
 10 **A. No.**
 11 Q. Can I just go through the others that we know something
 12 about them, because we have seen them on the indictment.
 13 Do you remember, it feels a long time ago now, count
 14 2 on the indictment, which was 14 November 1995 at the
 15 Holyrood Post Office in Prestwich. For anyone that was
 16 interested, that was G2, page 775.
 17 Can we turn up, please, G2/779. Do you have that?
 18 **A. Yes.**
 19 Q. This is the offender details for that crime report?
 20 **A. For crime ...**
 21 Q. It was count 1 on the indictment.
 22 **A. Right.**
 23 Q. Yes -- sorry, count 2 on the indictment,
 24 14 November 1995, are you following?
 25 **A. Yes, I am now, yes.**

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1 Q. It has the same number, yes?
 2 **A. Yes.**
 3 Q. We can see that on page 779, the names of all five
 4 defendants appear, Peter Anderson, Stuart Ellis,
 5 Stuart Grainger, Anthony Grainger and David Totton, but
 6 there are not any court results recorded.
 7 **A. Yes.**
 8 Q. That therefore appeared on your page 138, or on the OPUS
 9 at page 138, as seven rows up from the bottom, as
 10 count 2, the robbery on 14 November 1995?
 11 **A. Yes.**
 12 Q. Shown as "Accused and detected".
 13 We know that that was an allegation made against
 14 Stuart Grainger alone of attempted robbery.
 15 **A. Yes.**
 16 Q. Why on our G2/779 do all five defendants appear?
 17 **A. You would have to speak to the officer in the case, the**
 18 **officer dealing, I don't know why they were attached to**
 19 **that crime.**
 20 Q. You don't know why the others are attached to that
 21 crime?
 22 **A. No.**
 23 Q. Because what it seems to have the effect of doing is
 24 that on this long list it includes Anthony Grainger's
 25 name against it?

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1 **A. Absolutely, for every crime that he is associated with,**
 2 **it is going to appear on that page in his OPUS print.**
 3 Q. Yes, even though we know in fact that that was a crime
 4 in fact in the ultimate result alleged against his
 5 brother which was ordered to lie on the file?
 6 **A. Yes.**
 7 Q. I am not going to go through all of them because we see
 8 this pattern emerging of an association with a crime,
 9 resulting in it ending up on this big long list.
 10 **A. The responsibility for that would be the officer**
 11 **carrying that crime, it is their responsibility to make**
 12 **sure their offender's page, which associates their**
 13 **crime, is correct.**
 14 Q. In fact we can see on G2/779 the court result has not
 15 been updated to show that in fact no action was taken
 16 against the other four and the person where action
 17 was --
 18 **A. The OIC would not do that, that would come from court**
 19 **results, the crime records bureau I think update that**
 20 **part, but the accused and charged parts of the crimes**
 21 **you associate your nominal with your crime and the**
 22 **status that they are at.**
 23 Q. Looking at G2/779, the column where it says "Means of
 24 disposal" and it says "Charge/summons", can you see
 25 that?

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1 **A. Yes.**
 2 Q. Has that been completed or not?
 3 **A. No.**
 4 Q. We don't know whether any of them were in fact charged
 5 with it?
 6 **A. They were just accused of it, but we don't know if they**
 7 **had been eliminated or charged.**
 8 Q. That has not been updated either?
 9 **A. No.**
 10 Q. Okay.
 11 Can we go through another example and as I say I am
 12 only going to do these at the moment I think from the
 13 counts on the indictment because we know we have
 14 information --
 15 **A. To associate.**
 16 Q. Yes, we can see where it ended up.
 17 **A. Okay.**
 18 Q. Do you remember count 3 on the indictment? That was
 19 a conspiracy to rob against David Totton and
 20 Anthony Grainger?
 21 **A. Grainger, yes.**
 22 Q. If we look at G2/841, please.
 23 **A. 2/841?**
 24 Q. Do you have that?
 25 **A. Yes.**

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1 Q. Can you see the crime number in the top left, 138481/96?
 2 **A. Yes.**
 3 Q. I think we can see that on our page 138 in your folder,
 4 third down?
 5 **A. Yes.**
 6 Q. Is count 3. I think the date is the same, 31 May 1996,
 7 can you see that?
 8 **A. Yes.**
 9 Q. That is in fact the date alleged in the indictment as
 10 well. There is another robbery alleged robbery on that
 11 day, which was also included in the conspiracy charge,
 12 but then, if we go forward to 847 -- sorry, 845, can we
 13 see the offender details?
 14 **A. Yes.**
 15 Q. We can see that there are no disposal details recorded
 16 there, are there?
 17 **A. No.**
 18 THE CHAIRMAN: Did you say 845 or 847?
 19 MR BEER: 845. I said 847 first and then I corrected
 20 myself.
 21 THE CHAIRMAN: That is okay.
 22 Yes.
 23 MR BEER: 845. No disposals recorded there either against
 24 means of disposal or court results?
 25 **A. No.**

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1 Q. Do you know why that is, is that somebody -- the officer
 2 in the case not properly updating the means of disposal
 3 and then criminal records not updating the means of or
 4 the court results?
 5 **A. For me, if you are asking why this is for this specific**
 6 **crime, I really have no idea, this is the first time**
 7 **I am really seeing these. If it was me and I was**
 8 **carrying that crime and somebody was eliminated, I would**
 9 **personally deem myself responsible to update --**
 10 Q. Your crime?
 11 **A. -- my crime as eliminated. In terms of all these**
 12 **crimes, you would have to speak to the officer that**
 13 **dealt with them, the 2146 or 2166.**
 14 Q. One last then one, count 4 on the indictment, please, if
 15 you remember count 4 on the indictment was 10 June 1996
 16 and substantive offence of robbery against four men,
 17 David Totton, Anthony Grainger, Stuart Grainger and
 18 Peter Anderson -- did I say Stuart Grainger?
 19 David Totton, Anthony Grainger, Stuart Ellis and
 20 Peter Anderson, so everyone except Stuart Grainger?
 21 **A. Yes.**
 22 Q. At the Adelphi Post Office I think it was, if you go to
 23 G2/853.
 24 **A. Yes.**
 25 Q. I think we can see this crime there, 10 June 1996, at

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1 the Adelphi Post Office in Islington, Salford, the crime
 2 14851L/96 and that is at the top of our page 138, do you
 3 have your page 138?
 4 **A. Yes. Top one, 10 June.**
 5 Q. Yes. 10 June?
 6 **A. Yes.**
 7 Q. Then if we look at the disposal at 857, four men, so
 8 that is right, that four men were on there, it is
 9 correctly recorded in the column against
 10 Anthony Grainger, insofar as it says:
 11 "Found not guilty of this offence."
 12 **A. Yes.**
 13 Q. Yes.
 14 **A. Yes.**
 15 Q. It is incorrect for Stuart Grainger -- sorry --
 16 THE CHAIRMAN: You mean Stuart Ellis.
 17 **A. Stuart Ellis.**
 18 MR BEER: In fact nothing is recorded against Stuart Ellis.
 19 THE CHAIRMAN: Yes.
 20 **A. Yes.**
 21 MR BEER: That is just an error, or not properly updated?
 22 **A. I would assume so. I would be guessing, it is not my**
 23 **crime, so ...**
 24 Q. I am not going to go through the balance of the other 14
 25 or so entries on the OPUS summary that we have looked at

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1 where they are not on the indictment because we don't
 2 necessarily have the information to fill in what had
 3 happened, but is the effect of pages 137 and 138 and
 4 following to link Mr Grainger with crimes, including
 5 crimes of robbery --
 6 **A. Yes.**
 7 Q. -- when in fact action has been taken against him and it
 8 has resulted in an acquittal or he has not been charged
 9 but, because the crime report has not been properly
 10 updated, the right outcome is not recorded?
 11 **A. As you see on page 137 --**
 12 Q. Yes.
 13 **A. -- the second robbery down, he is shown as eliminated**
 14 **from that, although it was detected. That is the kind**
 15 **of result I would expect --**
 16 Q. Yes, for some of the ones we have looked at?
 17 **A. -- for all the ones through, if he had been eliminated**
 18 **it should say that he has been eliminated but some of**
 19 **them remain -- in the text.**
 20 Q. What does "eliminated" mean?
 21 **A. That he has been a party of interest in relation to**
 22 **that, but he has been found not -- he was spoken to in**
 23 **relation to that crime but then he has not been charged**
 24 **with any offence or anything linked to that.**
 25 Q. "Eliminated" means not charged, does it or can it mean

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1 charged but acquitted?
 2 **A. I don't know. I don't know. I would say not charged,**
 3 **but ... I really don't know.**
 4 Q. We can put those away now, thank you.
 5 Did you in your researches uncover any information
 6 about an incident in 1997, December 1997, in which
 7 Anthony Grainger was alleged to have used a vehicle that
 8 he was driving to ram police officers' cars and cause
 9 them injuries?
 10 **A. No.**
 11 Q. Can I turn lastly then to the request that came in to
 12 use your subject profile for a different purpose than
 13 that which you had created it for?
 14 **A. Yes.**
 15 Q. I think you tell us in your witness statement how you
 16 became aware of this, if we just turn up your witness
 17 statement, it is page 1 of the bundle, the witness
 18 statement of 20 June 2012. You say in the third
 19 paragraph:
 20 "On 7 February 2012 I became aware that the force
 21 robbery unit had submitted a request to the Force
 22 Intelligence Branch for a subject profile to be created
 23 for Anthony Grainger. The decision was made by
 24 DS Russell Kelly that the profile I had created for
 25 Operation Samana on 20 September 2011 would be sent to

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1 the robbery unit and they could make any necessary
 2 updates or amendments."
 3 Is that right?
 4 **A. Yes.**
 5 Q. How did you become aware of the request by the robbery
 6 unit for the creation of a subject profile for
 7 Anthony Grainger?
 8 **A. From memory, I think it was when DS Kelly came out of**
 9 **the morning pace setter meeting and was about to tell**
 10 **the robbery unit that we didn't have the capacity to**
 11 **provide them with these profiles that they had**
 12 **requested. I didn't know it had been requested until**
 13 **that point and I just then said to Russ Kelly, "if it**
 14 **helps, there is a profile there with the intelligence**
 15 **linked to Anthony Grainger, if they want that, they can**
 16 **bring that up to date", and it is there, you know, it**
 17 **just went up to them. We were not going to do anything**
 18 **else other for it, but I did say to him that it had been**
 19 **created for Operation Samana.**
 20 Q. Just to get it clear, the decision had already been
 21 made, "No, we are not doing it", because, as we are
 22 going to hear in a moment, capacity and resources?
 23 **A. Yes.**
 24 Q. Then you said, "By the way, I have done one"?
 25 **A. There was a recent one -- I think I said something along**

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1 **the lines of, "There is a profile ..." I think by that**
 2 **time, profiles that had been created were starting to be**
 3 **stored on a central unit that within the FIB we all had**
 4 **access to, in case the same nominals cropped up on**
 5 **another incident we could then, the template was there**
 6 **to start with and we could bring them up to date. So**
 7 **I was telling DS Kelly that there was a profile already**
 8 **in existence, it was five months old and they would have**
 9 **to bring it up to date.**
 10 Q. Okay.
 11 We will hear evidence later that that was indeed the
 12 decision, to use your existing subject profile. Was
 13 that an usual or unusual occurrence?
 14 **A. It was quite usual.**
 15 Q. Was it quite usual that you didn't have the capacity to
 16 fulfil every request?
 17 **A. Yes, with abstraction, sickness, that kind of thing,**
 18 **yes, we couldn't do everything.**
 19 Q. You have mentioned already that it would be down to the
 20 robbery unit for updating the profile?
 21 **A. Yes.**
 22 Q. If we look lastly at an email that was sent, I don't
 23 think by you, but by Mr Kelly.
 24 **A. DS Kelly sent it, didn't he?**
 25 Q. Page 91 of the bundle there.

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1 **A. Page 91?**
 2 Q. 91, yes.
 3 For anyone that is looking, that is F/1228.
 4 This an email from Detective Sergeant Russell Kelly
 5 to Deborah Hurst:
 6 "Debbie, further to your request, please find
 7 attached the intelligence profile for Anthony Grainger,
 8 this is current up to September 2011, it includes a risk
 9 assessment and Experian checks. It was decided at this
 10 morning's ISD pace setter meeting that any further work
 11 required to bring the profile up to date will need to be
 12 completed by yourself. This decision was made based on
 13 staffing levels and current workloads within the
 14 department and staff within the SCD ..."
 15 Is that the serious crime directorate?
 16 **A. Division, yes.**
 17 Q. Division:
 18 "... have full access to COPU ..."
 19 Tell us what COPU is?
 20 **A. It is an old intelligence system that we used, but still**
 21 **had access to it for historic intel.**
 22 Q. "... OPUS and FIS ..."
 23 FIS is?
 24 **A. The force intelligence system, the same within OPUS.**
 25 Q. "... any problems please get back to me, thanks, Russ."

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<p>1 You knew that the robbery unit would have 2 responsibility for updating the profile? 3 A. Yes. 4 Q. Although you were not a party to this, you were 5 presumably -- 6 A. I wasn't. 7 Q. You would join in in saying that this makes it clear to 8 them that it was their responsibility? 9 A. I would agree that that is what that says, that was the 10 proviso that I said to Russ when I said I had a profile, 11 but they will need to bring it up to date. 12 Q. Okay. 13 A. That is what that also said in his email. 14 Q. What would you have expected the robbery unit to have 15 done? 16 A. I would have expected them to have gone through, removed 17 all the stuff in relation to Colin Waters. 18 THE CHAIRMAN: You would expect them to have gone through 19 what, sorry? 20 A. Gone through the profile that has been attached here, 21 remove the stuff for Colin Waters if they just wanted 22 a profile for Anthony Grainger, and checked, checked 23 what was already contained within there and bring their 24 intelligence, obviously, this -- Samana was 25 September 2011, this was now February 2012, so it would</p> <p style="text-align: center;">Page 81</p>	<p>1 THE CHAIRMAN: Thank you. 2 Thank you for helping the Inquiry that is the end of 3 your evidence and you are now released. Thank you. 4 A. Thank you. 5 MR BEER: Ms Whyte I think clarified there -- 6 THE CHAIRMAN: Sorry I took your silence as indicating that 7 you had nothing. 8 MS WHYTE: Quite right. 9 MR BEER: Sir, I wonder whether that might be a convenient 10 moment. I know it is 12.45. 11 THE CHAIRMAN: Shall we resume at 1.55? 12 MR BEER: Thank you, sir. 13 THE CHAIRMAN: Thank you. 14 (12.45 pm) 15 (The Luncheon Adjournment) 16 (2.00 pm) 17 MR BEER: Simon Lapniewski, please. 18 THE CHAIRMAN: Thank you. 19 MR SIMON LAPNIEWSKI (sworn) 20 THE CHAIRMAN: You are welcome to sit down if you would like 21 to do so. 22 A. Okay. 23 Questions from MR BEER 24 MR BEER: If you do sit down, just bring the chair forwards. 25 A. I will stand for the moment.</p> <p style="text-align: center;">Page 83</p>
<p>1 be their responsibility to check any intelligence and 2 whether it was relevant to what they were investigating 3 since that date to current. 4 MR BEER: If somebody had said, "Your subject profile is 5 going to be used to brief firearms officers on 6 an operation that may end with a strike on suspected 7 armed robbers", what would you have said? 8 A. I personally would say that is not what it has been 9 designed for. As I said previously, I would expect 10 briefings to firearms officers, rightly or wrongly, 11 I don't know if this happens, this is just my 12 expectation would be that something bespoke would be put 13 together for firearms officers and I wouldn't expect 14 that to be my profile, or anybody else's at my level. 15 MR BEER: Thank you very much indeed. 16 They are the only questions that I ask, sir. 17 THE CHAIRMAN: Thank you. 18 Mr Thomas, is there anything you need to ask? 19 MR THOMAS: No, Mr Beer has covered what we wanted. 20 THE CHAIRMAN: Thank you, Mr Thomas. 21 MS MURPHY: Sir, that is the position for 22 Ms Hadfield-Grainger also. 23 THE CHAIRMAN: Thank you. 24 Mr Davies. 25 MR DAVIES: No thank you, sir.</p> <p style="text-align: center;">Page 82</p>	<p>1 THE CHAIRMAN: Okay, can you open up the bundle that is in 2 front of you, please. 3 A. Certainly. 4 Q. Mr Lapniewski, you should find between pages 1 and 7 5 four witness statements, if we can just walk through 6 them together. The first is 18 June 2012, do you have 7 that? On pages 1 and 2. 8 A. Yes, I do. 9 Q. Then on page 3, a witness statement of 5 March 2014? 10 A. Yes. 11 Q. On pages. Pages 4, 5 and 6 a witness statement of 12 13 July 2014. And on page 7, a witness statement dated 13 9 September 2014. 14 A. Yes, I have, yes. 15 Q. Are those your four witness statements? 16 A. They appear to be so, yes. 17 Q. Are the contents of them true to the best of your 18 knowledge and belief? 19 A. Yes. 20 Q. Thank you. In terms of your background and length of 21 service, when did you join the police service? 22 A. I joined the police in 2000, April 2000. 23 Q. What rank and position do you currently hold? 24 A. Detective Constable. 25 Q. In late 2011 we know that you were serving in the Force</p> <p style="text-align: center;">Page 84</p>

1 Intelligence Branch; is that right?
 2 **A. Yes.**
 3 Q. How long had you been performing a role within the FIB?
 4 **A. In the FIB from I think around about August 2008?**
 5 Q. So about three and a bit years?
 6 **A. Yes.**
 7 Q. What was your job title by late 2011?
 8 **A. Field intelligence officer, I believe it was.**
 9 Q. What was the job of a field intelligence officer?
 10 **A. It is -- I suppose you would describe it as being part**
 11 **of the NIM process, part of the national intelligence**
 12 **model, and you would be developing organised crime**
 13 **groups to look at what -- to try and ascertain what the**
 14 **threat is to certain OCGs across the force. And look at**
 15 **the banding of those, that was part of the role, a big**
 16 **part of the role.**
 17 Q. Right.
 18 **A. You would do, assist with profiles for, as they came,**
 19 **subject profiles for various different divisions and**
 20 **departments, deal with intelligence as it came in on**
 21 **a daily basis, you might be on duty cover where you**
 22 **would look at a piece of intelligence that might be**
 23 **classed as, what I would call hot, where it has got a**
 24 **harm opportunity or threat to that piece of**
 25 **intelligence, you might be asked to develop that little**

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1 **bit further, that piece of intelligence before it gets**
 2 **allocated out to a division. Or if there is an incident**
 3 **like an armed robbery or something, you might assist by**
 4 **looking into that on that particular day, if there is**
 5 **any enquiries that needed doing, because of the access**
 6 **to the systems that we had. So it varied, the role, but**
 7 **predominantly --**
 8 Q. The preparation of subject profiles was only a part of
 9 your role?
 10 **A. Yes, that's right, sir.**
 11 Q. Did you receive any training on joining the unit or
 12 afterwards about the preparation of subject profiles?
 13 **A. Training was -- it wasn't official training, it was not**
 14 **like I was sat in a classroom, it was more learn on the**
 15 **job really.**
 16 Q. Okay, so there wasn't a course that you went on or
 17 a course within the FIB premises, and you didn't receive
 18 formal instruction?
 19 **A. No, sir, no.**
 20 Q. But you picked it up on the job?
 21 **A. Yes, yes.**
 22 Q. Sometimes "picking it up on the job" would mean that you
 23 would be allocated to another more senior or experienced
 24 member of staff, is that what this picking up on the job
 25 was for subject profiles?

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1 **A. You got guidance off an officer that may have done a bit**
 2 **more service than yourself, yes.**
 3 Q. Was this relatively informal, showing you the ropes?
 4 **A. Yes.**
 5 Q. Is it right that there wasn't a formal policy or
 6 guidance document about the creation of subject profiles
 7 that you were aware of?
 8 **A. Not that I am aware of, no.**
 9 Q. The documents I have been referring to are called
 10 "subject profiles", is that the same thing as a "pen
 11 picture"?
 12 **A. I would say so, yes. I mean I have seen some other**
 13 **forces refer to them as a pen picture.**
 14 Q. I am just talking about GMP at the moment, don't worry
 15 about other forces.
 16 **A. I have never referred to it as a pen picture but**
 17 **I can -- yes, I get where -- yes, why some people might,**
 18 **within GMP itself, some people might refer to it as**
 19 **a pen picture.**
 20 Q. Is that the same thing as a nominal profile?
 21 **A. Yes, I have seen that before.**
 22 Q. And an intelligence profile?
 23 **A. I have not seen it referred to as intelligence profile,**
 24 **I think intelligence profile might be referred to more**
 25 **of as a specific incidence, but --**

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1 Q. If we just look at the bundle that we have in front of
 2 us there, page 9, that is F/33 for those that are
 3 following. You can see that yours is called a nominal
 4 profile?
 5 **A. That is called -- yes.**
 6 Q. Is that the same thing as a subject profile?
 7 **A. It is, yes.**
 8 Q. Then there should be another binder on the table there.
 9 It looks like somebody has taken it away.
 10 Yes, please, thank you. (Handed)
 11 Thank you, it is tab 2 of your bundle, sir.
 12 THE CHAIRMAN: Yes.
 13 **A. Yes.**
 14 MR BEER: In this bundle it is bundle 6, that is F/11 for
 15 those that are following and so page 6, please.
 16 **A. 6, yes.**
 17 Q. Do you have that?
 18 **A. Right.**
 19 Q. We can see what is described there as a pen picture for
 20 Anthony Grainger?
 21 **A. Yes.**
 22 Q. Produced by PC Rachel Griffiths on 20 September, so it
 23 is at the same time of year as you produced your nominal
 24 profile for David Totton?
 25 **A. Yes. Yes.**

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1 Q. Just have a quick leaf through that, please, between
 2 pages 6 and maybe 22.
 3 The question I am going to be asking when you have
 4 leafed through, so you know what you are looking for,
 5 is: does this look like a subject profile to you?
 6 **A. Yes. Yes. It is not the sort of format that I would**
 7 **use but it is ... yes. It looks like a very similar**
 8 **format.**
 9 Q. Was there a format that you used for the preparation of
 10 subject profiles?
 11 **A. There was, yes.**
 12 Q. Was that a format that other people in the FIB used for
 13 the preparation of subject profiles?
 14 **A. As far as I was aware, yes.**
 15 Q. Was there a format that you were supposed to use?
 16 **A. I suppose it did change, the format. Around about that**
 17 **time, I recall one of the sergeants introducing**
 18 **a slightly -- adding one or two different things to the**
 19 **profile, so it did change to an extent. So there might**
 20 **have been -- I am sure we received direction to use**
 21 **that -- the profile that was created.**
 22 THE CHAIRMAN: Sorry?
 23 MR BEER: We can see that hers was prepared on 20 September
 24 and yours on 11 October.
 25 **A. Yes.**

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1 Q. Are you saying you think that might be the explanation
 2 for the difference between the formatting?
 3 **A. Yes, yes. There was a couple of templates, I believe,**
 4 **that were in existence. But my understanding was the**
 5 **one I have used is the one --**
 6 Q. You were supposed to use?
 7 **A. Well, that was my understanding.**
 8 Q. Just looking at her document, would you say that this is
 9 supposed to fulfil the function of a subject profile?
 10 **A. Yes. Yes.**
 11 Q. Thank you.
 12 Going back to your document then, in your binder at
 13 page 9, F/33, can we see on the front page of it,
 14 please, and just look at it with some care, we can see
 15 the originator of it is you, the date it was produced is
 16 10 October 2011, it was last updated on 11 October 2011.
 17 It is version 1, and then it says:
 18 "The circulation list is within the FIB and the
 19 robbery unit."
 20 Yes?
 21 **A. Yes.**
 22 Q. Then it says:
 23 "Any further dissemination of this profile is not
 24 permitted without permission from the DIs in possession.
 25 This copy of the profile contains sensitive intelligence

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1 which needs sanitising in the first instance."
 2 That was intended to tell a recipient, was it, that
 3 further dissemination was prohibited without permission?
 4 **A. From the DI, yes.**
 5 Q. Where it says "from the DIs in possession", who is that
 6 meant to refer to?
 7 **A. In this instance it would have been Mr Cousen.**
 8 Q. He is the controller of further dissemination; is that
 9 right?
 10 **A. Going off what it says there, then that would be**
 11 **correct. I am -- my understanding was as well that the**
 12 **DS would be able to permit that dissemination as well**
 13 **with the authorisation of Rob Cousen, but that is my**
 14 **understanding.**
 15 Q. Where do you get that understanding from?
 16 **A. Because I suppose you would call it common practice,**
 17 **that as long as the DI for an investigation gives that**
 18 **authority, then he can delegate that responsibility,**
 19 **I just thought that was the practice.**
 20 Q. Okay. The box underneath that says:
 21 "This intelligence document has been compiled for
 22 the purpose of dissemination to robbery unit DS Hurst.
 23 Under no account should this document be disseminated
 24 without prior authorisation of the management at Greater
 25 Manchester Police Force Intelligence Bureau."

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1 Which is slightly different from the box above,
 2 isn't it?
 3 **A. Yes.**
 4 Q. Which box governs further dissemination? The top box or
 5 the bottom box?
 6 **A. The top box.**
 7 Q. Why?
 8 **A. Because it wasn't -- I am not aware of once a profile is**
 9 **done for the recipients, them really contacting us to**
 10 **ask, "Can we give it to X, Y and Z?" So that wasn't the**
 11 **practice.**
 12 Q. Such contact might for example be used as an occasion
 13 for the Force Intelligence Bureau management to say,
 14 "No, don't disseminate it, it was not prepared with that
 15 purpose in mind", mightn't it?
 16 **A. It might do, yes.**
 17 Q. Did that ever happen?
 18 **A. In general or in relation --**
 19 Q. No, no we will come on to this in a minute. In general?
 20 **A. Not that I am -- there is nothing, no instance I can**
 21 **recall.**
 22 Q. No, because it might be you prepare the profile for
 23 purpose A, somebody wants to use it for purpose B and
 24 FIB can say, "Hold your horses, it was not designed or
 25 created with purpose B in mind", either don't do it or

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<p>1 it comes with a health warning?</p> <p>2 A. Yes.</p> <p>3 Q. Okay.</p> <p>4 It may be you are not the right person to answer</p> <p>5 this question because this is just a template on the</p> <p>6 front page of a document, there are two contradictory</p> <p>7 boxes there.</p> <p>8 One says further dissemination is at the hands of</p> <p>9 the DI or his deputy.</p> <p>10 Another one says we retain rights over further</p> <p>11 dissemination, the FIB.</p> <p>12 Do you know why the bottom box is there and why the</p> <p>13 top box is to be preferred?</p> <p>14 A. I don't. No, sorry.</p> <p>15 Q. You probably never looked at it with that much</p> <p>16 attention, they were just a couple of boxes on the front</p> <p>17 page of a document. Is that fair?</p> <p>18 A. That is probably fair, to be honest with you.</p> <p>19 Q. Can I go through the sections, please, of your document,</p> <p>20 you have a contents page at page 10, please, which sets</p> <p>21 out the sections that you have then populated. Is it</p> <p>22 right, this is a Word document where the architecture of</p> <p>23 the document is there and then you populate each</p> <p>24 section?</p> <p>25 A. That's right, sir, yes.</p> <p style="text-align: center;">Page 93</p>	<p>1 Q. Intelligence from it was used, but it was not sent out?</p> <p>2 A. Yes, that's correct, sir, yes.</p> <p>3 Q. So that 100-odd pages was not sent out, it is just in</p> <p>4 the exhibit that we have from the IPCC your subject</p> <p>5 profile runs as if it includes all of those pages. Do</p> <p>6 you understand?</p> <p>7 A. Yes, yes, I didn't print that out and provide it to</p> <p>8 anybody.</p> <p>9 Q. No, okay. The document that was disseminated is the one</p> <p>10 that appears between pages 9 and 21?</p> <p>11 A. That's correct, sir, yes.</p> <p>12 Q. Which is, for people looking elsewhere, F/33 to F/45.</p> <p>13 Thank you.</p> <p>14 Can I turn then to the use -- I am talking in</p> <p>15 general terms here, not this case -- to which</p> <p>16 information which you provide might be put. When you</p> <p>17 are preparing a subject profile, do you know the purpose</p> <p>18 to which it might be applied when you or after you have</p> <p>19 handed it over?</p> <p>20 A. It has never been explained definitive. My</p> <p>21 understanding was that they would use it for at the</p> <p>22 start of an enquiry to have an understanding of that</p> <p>23 subject, so it incorporates up-to-date intelligence that</p> <p>24 would not be captured in the OPUS profile, which is</p> <p>25 accessible by a majority of police officers. Its</p> <p style="text-align: center;">Page 95</p>
<p>1 Q. Thank you.</p> <p>2 The sections are: personal details, on page 11;</p> <p>3 section 2 is intelligence checks to inform any risk</p> <p>4 assessment; section 3, on page 14, is the primary</p> <p>5 address of the subject; at page 17, section 4, access to</p> <p>6 vehicles; section 5, communications data; section 6,</p> <p>7 social networking; section 7, additional identification</p> <p>8 numbers; section 8, key associates; section 9, on</p> <p>9 page 20, associated businesses; section 10, financial</p> <p>10 assets; section 11, intelligence summary.</p> <p>11 They are the 11 parts corresponding to your index,</p> <p>12 yes?</p> <p>13 A. Yes, sir, yes.</p> <p>14 Q. Just whilst we are on page 21, can you see the documents</p> <p>15 that appear between page 22 and 123, if you just flick</p> <p>16 through them.</p> <p>17 A. Yes, that looks like a printout from OPUS.</p> <p>18 Q. Yes, it is an OPUS printout of the nominal program. Can</p> <p>19 you confirm that that was not part of the profile that</p> <p>20 you created?</p> <p>21 A. I would have used --</p> <p>22 Q. Sorry, it is a bad question. Can you confirm that the</p> <p>23 documents between page 22 and 123 were not part of the</p> <p>24 document that you disseminated?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 94</p>	<p>1 intention is to give a clear understanding of addresses,</p> <p>2 vehicles, because like I say that information might not</p> <p>3 be held on records that were available to other</p> <p>4 officers, so we can research different systems to</p> <p>5 provide an clear understanding which they might want to</p> <p>6 use for OPs or like for surveillance and stuff like</p> <p>7 that, so telecommunications data.</p> <p>8 Q. Okay. You understood that the purpose of the provision</p> <p>9 of a profile was for investigative processes?</p> <p>10 A. Yes, sir.</p> <p>11 Q. That might translate into some operational action like</p> <p>12 staffing up an observation post or conducting</p> <p>13 surveillance?</p> <p>14 A. Yes, sir, yes.</p> <p>15 Q. Was the purpose of the profile -- or did it include, the</p> <p>16 purpose of the profile, risk assessing going round to</p> <p>17 somebody's house to execute a search warrant?</p> <p>18 A. It included the risk assessments, not --</p> <p>19 Q. That is a slightly different issue, though.</p> <p>20 A. Yes. Not specifically for that sort of purpose. Again</p> <p>21 my understanding was that it would be used as a bit of</p> <p>22 a guide for the investigation team to perhaps conduct</p> <p>23 a little bit more further research into those crimes,</p> <p>24 just a starting point, should they need it further down</p> <p>25 the line for risk assessment.</p> <p style="text-align: center;">Page 96</p>

1 Q. Okay.

2 Did you understand that the purpose for which your

3 subject profile might be applied could be to brief

4 officers who were to be armed and go on an armed

5 deployment?

6 **A. I was aware of the potential. But I know it was quite**

7 **common practice for anybody to brief those sort of**

8 **meetings to have a full understanding of the**

9 **criminality.**

10 Q. If you can just keep your voice up a little bit.

11 **A. Yes, sorry, sir, yes.**

12 Q. You said you understood it was the practice of those

13 undertaking briefings to have a full picture of the

14 criminality of the subjects. That is a separate

15 question, that is about what they did to inform

16 themselves.

17 When you were writing a profile, did you know that

18 it could be used as the basis of a briefing for firearms

19 officers?

20 **A. The information that I have provided on the profile, for**

21 **simply to give a briefing for a firearms officer? No,**

22 **I would say I would have expected more information to be**

23 **provided on that risk assessment.**

24 Q. Looking at it another way, taking it away from the

25 general and more for the specific, were you asked to

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1 provide subject profiles with a specific purpose in

2 mind, ie, Case 1:

3 "We are conducting an investigation, we are right at

4 the beginning of it, we just want to know more about

5 this subject."

6 Case two:

7 "We know about this subject, we don't know where he

8 lives, we want to house him."

9 Case three:

10 "We know where the subject lives, we are going to

11 execute a search warrant there, we want to know what the

12 risk is when we execute the search warrant."

13 Case 4:

14 "We are thinking of mounting an armed operation, we

15 want to know all the available intelligence so we can

16 assess risk."

17 Were any of those cases, as I have called them, ever

18 explained to you when you were preparing a subject

19 profile?

20 **A. No, sir. They were not.**

21 Q. These were not bespoke documents with a specific purpose

22 in mind?

23 **A. No, sir.**

24 Q. Can we look, please, at part of the subject profile that

25 you have prepared, at page 11, please, which is

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1 section 2, that is F/35, for David Totton.

2 Section 2, the heading of it is "Intelligence checks

3 to inform any risk assessment".

4 **A. Yes.**

5 Q. Is the purpose of this section of the document to

6 provide operational officers with information that may

7 be relevant to the creation by them of a risk

8 assessment?

9 **A. I would say that was my understanding of it, I have**

10 **never been told directly but that was my assumption, my**

11 **understanding, that that is what was done.**

12 Q. It is marked out as being relevant to risk assessment,

13 is that why you say that?

14 **A. Yes. Yes, yes.**

15 Q. Presumably, whilst the information given in the balance

16 of the subject profile could be taken into account, no

17 doubt, in assessing risk, it was this section that had

18 that specific aim in mind, is that right?

19 **A. That's right, sir, yes.**

20 Q. Thank you.

21 Is the information that appears next to "warning

22 markers", slightly above that, also intended to be taken

23 into account of the risk assessment process?

24 **A. Yes, sir, yes.**

25 Q. In addition to the intelligence checks in section 2?

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1 **A. That's right, sir, yes.**

2 Q. Thank you.

3 In terms of responsibility for the development of

4 any of the intelligence in relation to subjects, in this

5 case, for a profile disseminated to the robbery unit,

6 was it your understanding that any updates as additions

7 to the profile were the responsibility of the robbery

8 unit?

9 **A. Yes, sir.**

10 Q. Would they have known that too?

11 **A. I don't recall -- well, I have never specifically said**

12 **that when I pass over a profile, if I am honest.**

13 **I don't know, you would have to ask them whether that**

14 **has been communicated by supervision but ...**

15 Q. I am trying to work out whether there was a common

16 understanding between the providers of profiles and the

17 recipients of profiles as to the allocation of

18 responsibility for updating. (Pause)

19 **A. That was my understanding, so --**

20 Q. It was your understanding that it was their

21 responsibility and it was your understanding that they

22 shared that understanding?

23 **A. Yes.**

24 Q. Where did you get that understanding from?

25 **A. We have -- we carry lots and lots of different nominal**

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1 profiles within the FIB folder. As I say, at that time
 2 I had probably been working there about three years and
 3 I had never had a single request from any department
 4 that the profiles had been disseminated to to update
 5 a profile.
 6 So I suppose that is part of the understanding -- my
 7 understanding, it just wasn't the practice to update the
 8 profiles. It was intended that this was a snapshot in
 9 time to be given to an operational team for them then to
 10 use for whatever purpose, obviously within a lawful
 11 policing purpose, that they wanted to.
 12 Q. You have assumed that the absence of requests for
 13 updating means that they understood that it was their
 14 responsibility?
 15 A. Yes, I suppose, yes. Yes.
 16 Q. Can we return to the warning markers on page 11, F/35,
 17 please. Do you see the box with "Warning markers,
 18 PNC/OPUS" on it?
 19 Page 11, F/35.
 20 THE CHAIRMAN: I have it.
 21 A. "OPUS/PNC", where it says that?
 22 MR BEER: Yes.
 23 A. Yes.
 24 Q. The information that you populate this field with comes
 25 from the PNC or OPUS or both?

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1 A. Yes, it is both, yes.
 2 Q. You have to look at OPUS and read it across and look at
 3 the PNC and read it across; is that right?
 4 A. That's right, sir, yes.
 5 Q. If anyone looked at both of these sources on
 6 10 October 2011, they should have come to the same
 7 conclusion as you, that these are the applicable warning
 8 markers for Mr Totton?
 9 A. Yes.
 10 Q. If the warning markers are different as between OPUS and
 11 the PNC, as indeed they are here, there is a firearms
 12 marker on OPUS but not on the PNC. Can you see that?
 13 A. Yes, I can, sir, yes.
 14 Q. Would you include all of them or would you include one
 15 in preference to the other, the PNC over OPUS?
 16 A. Well, I have actually done that there, so I would
 17 obviously do that, but if you were to use one over the
 18 other, then I suppose one has pros -- they have got pros
 19 and cons on looking at each other really --
 20 Q. What are the pros and cons of the PNC?
 21 A. The PNC is more based on convictions rather than
 22 intelligence, whereas the OPUS is more based around what
 23 intelligence is held. So you would have to go into,
 24 look into those and maybe look at the handling
 25 conditions of that specific intelligence to try and

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1 attribute a bit more weight to the marker.
 2 Q. You said in the course of that answer that the PNC is
 3 more based on convictions than intelligence. What led
 4 you to that belief, that warning markers on the PNC were
 5 more conviction based?
 6 A. I mean you can get other warning markers on PNC, such as
 7 Whisky Mike, wanted markers, which you can also use for
 8 missing from homes, which obviously are not convictions.
 9 Q. Yes.
 10 A. But in this instance, weapons, violence, my
 11 understanding is that once a nominal is convicted then
 12 they would get attributed that relevant marker by the
 13 PNC bureau, I presume.
 14 Q. Things like firearms, violence, weapons or drugs, your
 15 understanding was that they were conviction based?
 16 A. My understanding, yes.
 17 Q. If we also look, please, at page 18 of this profile,
 18 that is F/42. You are here dealing with Mr Grainger as
 19 an associate within Mr Totton's profile,
 20 Anthony Grainger, at the foot of the page.
 21 A. Yes, yes.
 22 Q. Did you create or read across those warning markers at
 23 the foot of the page for Mr Grainger?
 24 A. I did, yes. I put those on, yes.
 25 Q. So:

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1 "GMPics warnings, commits offences on bail, violent
 2 weapon, radio scanner, on prison licence, subject is
 3 a group 1 offender."
 4 Do you see that?
 5 A. I do, yes, sir.
 6 Q. There you have included I think, putting aside him being
 7 on prison licence and being a group 1 offender, four
 8 categories of warning: he commits offences whilst on
 9 bail; he is violent; he has a warning marker for using
 10 weapons, or a weapon; and using a radio scanner. Yes?
 11 A. Yes, sir.
 12 Q. Can we look in the other bundle that you have, whilst
 13 keeping that one open.
 14 This is tab 2 for you, sir.
 15 THE CHAIRMAN: Yes.
 16 MR BEER: At page 9 of the bundle, that is F/14.
 17 This is part of the subject profile created by
 18 PC Griffiths, about three or four weeks before you.
 19 A. Yes.
 20 Q. Yes?
 21 A. Yes.
 22 Q. In fact it is a bit less than that, 20 September versus
 23 10 October. So about 20 days?
 24 A. Yes.
 25 Q. Can you see her warning markers are violence and drugs.

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<p>1 Can you see that?</p> <p>2 A. I can, sir, sorry, yes.</p> <p>3 Q. Which she seems to have taken from the PNC?</p> <p>4 A. Yes.</p> <p>5 Q. We can see that she said that Mr Grainger has warnings</p> <p>6 for violence and drugs too, whereas you have taken from</p> <p>7 the same available records that he has four warnings for</p> <p>8 bail offending, violence, weapons and use of radio</p> <p>9 scanners. Is that just the vagaries of different people</p> <p>10 doing the same job?</p> <p>11 A. Yes, it would appear, as I say I appreciate it is a long</p> <p>12 time ago but from looking at, it appears that I have not</p> <p>13 checked the PNC record when I have put that as</p> <p>14 an associate.</p> <p>15 Q. And that she has not checked the OPUS or at least has</p> <p>16 not recorded checking the OPUS?</p> <p>17 A. Potentially -- she must have looked at the OPUS if she</p> <p>18 is creating this profile.</p> <p>19 Q. She looked at OPUS for some reasons, because we can see</p> <p>20 reference to OPUS and we have extracts from it included</p> <p>21 in here, but maybe not for the purpose of inclusion of</p> <p>22 warning markers?</p> <p>23 A. Yes, I mean this -- the intention when doing these</p> <p>24 associates, unless there is specific intelligence saying</p> <p>25 they are working criminally together, it is informing</p> <p style="text-align: center;">Page 105</p>	<p>1 go to somebody else. And likewise if there was any</p> <p>2 inquires required, I might be the initial point of</p> <p>3 contact but if I am not about, too busy or something,</p> <p>4 then it might go somewhere else. I was one of many</p> <p>5 detective constables in the FIB that could perform</p> <p>6 a similar role.</p> <p>7 Q. You have heard it said that DI Cousen says that you were</p> <p>8 the SPOC, and you disagree with that?</p> <p>9 A. Yes. I do, sir, if that is okay.</p> <p>10 Q. No, that is absolutely fine.</p> <p>11 I think your answer there is maybe made out from</p> <p>12 an email that we have discovered in DI Cousen's hand.</p> <p>13 I hope that it is -- it was loose, one of two loosely</p> <p>14 distributed emails this morning, which I hope is on your</p> <p>15 table there.</p> <p>16 It is just coming over, it won't be a second.</p> <p>17 Sir, just to explain, we have recently received back</p> <p>18 a large amount of Mr Cousen's emails --</p> <p>19 THE CHAIRMAN: Yes.</p> <p>20 MR BEER: -- they having gone through a redaction process.</p> <p>21 You will remember back on 14 December I said that then</p> <p>22 we had recently received DI Cousen's emails.</p> <p>23 THE CHAIRMAN: Yes.</p> <p>24 MR BEER: In the intervening two months they have been</p> <p>25 redacted, and we received them back, I think, yesterday.</p> <p style="text-align: center;">Page 107</p>
<p>1 the operational team that that is a potential associate</p> <p>2 in case they came upon a plot or something like that,</p> <p>3 they have an idea of who that might be. And then just</p> <p>4 to give an idea what is held on the local system.</p> <p>5 Q. Why would you go to PNC and OPUS for Mr Totton but only</p> <p>6 to OPUS for Mr Grainger?</p> <p>7 A. Because the subject profile is, it was based around</p> <p>8 Mr Totton and not around his associates, it was just</p> <p>9 to -- like I say, to give an indication of, I suppose,</p> <p>10 flavour is not the right word but an indication about</p> <p>11 that nominal.</p> <p>12 Q. Okay.</p> <p>13 You were I think, according, at least according to</p> <p>14 DI Rob Cousen, the SIO for Operation Shire, the single</p> <p>15 point of contact within the FIB for Operation Shire. Is</p> <p>16 that right?</p> <p>17 A. According to Mr Cousen, I suppose, I have heard that,</p> <p>18 yes.</p> <p>19 Q. What about according to you?</p> <p>20 A. Not according to me, no, sir.</p> <p>21 Q. You were not the SPOC?</p> <p>22 A. Not a single point of contact, no. I was a point of</p> <p>23 contact when I was initially asked to do the profiles.</p> <p>24 Any subsequent profiles, if I was available then I would</p> <p>25 produce them but I was not available then it would just</p> <p style="text-align: center;">Page 106</p>	<p>1 We have looked through them very quickly to see</p> <p>2 before distributing them to core participants, the</p> <p>3 emails that seem to be of direct relevance to the</p> <p>4 witnesses coming up this week, whilst the CPs digest</p> <p>5 them, so that is why these are just loose documents.</p> <p>6 THE CHAIRMAN: Right, thank you.</p> <p>7 MR BEER: There should be one dated 13 January 2012. Do you</p> <p>8 have that one? Just ignore the one dated</p> <p>9 7 February 2012.</p> <p>10 A. I have, sir, yes.</p> <p>11 Q. Yes, good.</p> <p>12 You are not on the copy list here, or you are not</p> <p>13 a sender or a recipient of this?</p> <p>14 A. No, sir.</p> <p>15 Q. You can see it is dated 13 January 2012 from Rob Cousen</p> <p>16 to Ann Buckley, who was Ann Buckley?</p> <p>17 A. She was our -- a DI, detective inspector, within the FIB</p> <p>18 at the time.</p> <p>19 Q. He says:</p> <p>20 "Ann, due to your lack of staff we have recently</p> <p>21 been conducting a lot of our own intelligence checks on</p> <p>22 Operation Shire. I am in a position now where I need to</p> <p>23 develop intelligence packs for further nominals. Do you</p> <p>24 have anyone available to assist? Simon has previously</p> <p>25 been our SPOC, but I know he has been deployed on other</p> <p style="text-align: center;">Page 108</p>

<p>1 matters recently."</p> <p>2 It is partially supports what he says, that you were</p> <p>3 the SPOC, and partially supports what you say that you</p> <p>4 certainly did not continue to be the SPOC.</p> <p>5 Were you ever told that you were the SPOC?</p> <p>6 A. No. No, sir.</p> <p>7 Q. Was it usual for an operation such as Operation Shire to</p> <p>8 have a single point of contact within the FIB?</p> <p>9 A. No, sir.</p> <p>10 Q. Was your role, therefore, limited to providing the</p> <p>11 subject profiles that we have seen?</p> <p>12 A. It was, sir. I --</p> <p>13 Q. You I think also attended a meeting in December 2011.</p> <p>14 A. Yes, I was asked to print off by -- my sergeant,</p> <p>15 DS Russ Kelly, asked me to print off some of the nominal</p> <p>16 profiles that I had produced in relation to Operation</p> <p>17 Shire and then go, because they are only up two floors</p> <p>18 from where we were, hand them over to Mr Cousen, which</p> <p>19 I did. Then at the time he informed me that he needed</p> <p>20 them for a silver cadre meeting.</p> <p>21 THE CHAIRMAN: A what meeting?</p> <p>22 A. A silver cadre, it is where they brief a superintendent</p> <p>23 in relation to firearms risks, I have never --</p> <p>24 MR BEER: It is another word for a tactical firearms</p> <p>25 commander.</p> <p style="text-align: center;">Page 109</p>	<p>1 A. It was, sir, yes.</p> <p>2 Q. Can we see on page 177 you have put a note in of the</p> <p>3 meeting that you attended on the 12th, so you had been</p> <p>4 instructed, I think you said, to deliver some subject</p> <p>5 profiles?</p> <p>6 A. Yes, sir.</p> <p>7 Q. Can you remember by chance who they were relating to?</p> <p>8 A. Sorry, the notes?</p> <p>9 Q. No, no, the subject profiles?</p> <p>10 A. The profiles? Well at that time it would have been</p> <p>11 David Totton --</p> <p>12 Q. Just -- Mr Totton's, we have already seen, was prepared</p> <p>13 much earlier back at the beginning of October. You</p> <p>14 wouldn't have waited two months before handing it over,</p> <p>15 would you?</p> <p>16 A. No, sir. No.</p> <p>17 Q. No. But what were you walking it up again or --</p> <p>18 A. No, I know what you're saying, so for that cadre it</p> <p>19 would have been a month or two out of date, is that what</p> <p>20 you are referring to?</p> <p>21 Q. Yes, you said that you walked some profiles upstairs.</p> <p>22 I am asking which profiles. You said David Totton's,</p> <p>23 but his had been prepared and sent two months before</p> <p>24 now.</p> <p>25 A. No, he just wanted them printed off, I think. It was</p> <p style="text-align: center;">Page 111</p>
<p>1 A. In that meeting, I think it was Mr Giladi,</p> <p>2 Superintendent Giladi and DCI Tony Creeley.</p> <p>3 Q. We are going to come on to the note of the meeting in</p> <p>4 a moment.</p> <p>5 A. Okay --</p> <p>6 THE CHAIRMAN: Just so I have my note right, you handed the</p> <p>7 profiles to Mr Cousen and he was the one that told you</p> <p>8 he needed them for a silver cadre meeting?</p> <p>9 A. That's correct, sir, yes.</p> <p>10 MR BEER: Then the third thing I think you did was conduct</p> <p>11 a passport enquiry.</p> <p>12 A. That's correct.</p> <p>13 Q. Your role was limited to providing the subject profiles,</p> <p>14 attending the meeting and conducting the passport</p> <p>15 enquiry?</p> <p>16 A. That's right, sir, yes.</p> <p>17 Q. Can we look at the attending the meeting point first,</p> <p>18 page 177 in your own bundle which for those that are</p> <p>19 following is K/204.</p> <p>20 If we start at 176 so the chairman can see where</p> <p>21 this document comes from.</p> <p>22 This part of your casebook, was this casebook given</p> <p>23 over to Operation Shire? When I say "given over", not</p> <p>24 passed over, was it prepared and completed only for the</p> <p>25 purpose of Operation Shire.</p> <p style="text-align: center;">Page 110</p>	<p>1 just to assist Mr Cousen to print those documents off.</p> <p>2 Q. Okay.</p> <p>3 A. In my mind that, is exactly what it was, see, to save</p> <p>4 him having to print them off.</p> <p>5 Q. Right, I see.</p> <p>6 You walked at least Mr Totton's profile upstairs and</p> <p>7 attended this meeting?</p> <p>8 A. Yes, sir.</p> <p>9 Q. You have, "Superintendent Leor Giladi, silver cadre</p> <p>10 meeting, DCI Tony Creeley, DI Cousen ..."</p> <p>11 And somebody who is anonymised as J4, yes?</p> <p>12 A. Yes, sir.</p> <p>13 Q. Can you help us with your writing, if you just read it,</p> <p>14 please?</p> <p>15 A. As I say these were very rough notes made at the time</p> <p>16 for a meeting that I had never been in one before, never</p> <p>17 been in one since. So in my mind at the time it was</p> <p>18 rough notes to get a rough understanding of recent</p> <p>19 surveillance activity should I be require to produce any</p> <p>20 further profiles, so I would understand where that</p> <p>21 nominal featured in the investigation.</p> <p>22 Q. If you just walk us through it so I make sure I have not</p> <p>23 missed anything.</p> <p>24 Start with "Vehicle details".</p> <p>25 A. Yes, it says:</p> <p style="text-align: center;">Page 112</p>

1 "Vehicle details (7 and 3 stolen) in package need
 2 putting in."
 3 Q. Yes.
 4 A. Then it says:
 5 "8 December 2011, Aaron Brady in a stolen VW Golf on
 6 false plates went to Prestwich with an unknown male
 7 believed to be Jamie [presumed that would refer to
 8 Jamie Corkovic] went to Cheadle, no NPR hits, then did
 9 figure of 8 on the high street, G4S van on high street
 10 next to NatWest, scarf covering lower face, unknown
 11 person out on foot ..."
 12 I think that says "example":
 13 "... example Mary Street and cut through ..."
 14 That cannot refer to.
 15 Q. To "Alexandra Hospital", yes?
 16 A. Yes:
 17 "... Mary Street and cut through to Alexandra
 18 Hospital, DSU lose vehicle and back to Prestwich and
 19 back into an Audi motor vehicle. The Friday morning, at
 20 5.35 Aaron Corkovic stopped ..."
 21 Q. Stopped or spotted?
 22 A. "... stopped in Salford, an Audi, with an unknown male.
 23 Makes way across to Hereford Drive, gets out and changes
 24 his clothes and gets into a stolen VW. Vehicle driven
 25 around Whitefield for 30 minutes and seen to get into

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1 a Skoda Fabia which was stolen on false plates on
 2 Grainger Avenue, Whitefield, driver has a dark woollen
 3 hat, possibly rolled up, possibly Aaron.
 4 [Aaron Corkovic]. DSU lose near NatWest, Whitefield
 5 near Morrison's, DSU go back to VW Golf and find stolen
 6 Ford Focus on false plates. Goes on to Morrison's."
 7 Then it says:
 8 "NatWest in Cheadle possible location ..."
 9 And it mentions:
 10 "Anne-Marie is finding drop off details and on
 11 Thursday there is expected to be two deliveries.
 12 "Drops for this Friday in Whitefield required."
 13 Then it says, "Action".
 14 Q. Then something redacted. Let's leave the rest of the
 15 page for the moment.
 16 It looks like you were present at a silver firearm
 17 commanders meeting between him and the SIO and you were
 18 writing down details of recent surveillance activity.
 19 A. That's correct, sir, yes.
 20 Q. What was the purpose of that?
 21 A. My purpose, why I decided to do it, was in case -- as
 22 I say, I had not been involved in the operation other
 23 than producing the subject profiles, I had never been
 24 briefed on where they were up to with the investigation,
 25 I didn't see that flow of intelligence coming through.

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1 So if I am being asked to go into a silver cadre all
 2 of a sudden because I have printed off the profiles
 3 I want to have a bit of an understanding in case I was
 4 requested to produce any further subject profiles.
 5 Q. It was a bit of a shock to find yourself in a silver
 6 firearms commanders briefing?
 7 A. Yes, sir, it is the only one I have ever been in and as
 8 far as I am aware most of my colleagues have never been
 9 requested to go in one either.
 10 Q. Thank you.
 11 Can we look, please at a document that is not in the
 12 bundle. It is in file C at page 13, please. C/13.
 13 If we start at C/12, please, just to show you what
 14 this document is. It is an investigative assessment
 15 completed on 15 October 2011 by DI Rob Cousen for
 16 Operation Shire.
 17 A. Yes, sir.
 18 Q. On page 13, under the big heading of "Tactical options",
 19 he splits it down into "Investigation strategy",
 20 "Surveillance strategy" and at the foot of the page
 21 "Intelligence strategy". This is effectively a view
 22 looking forwards by him as to the strategies that he is
 23 going to adopt for the management of this investigation.
 24 A. Yes.
 25 Q. Under "Intelligence strategy" he says:

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1 "10. Making the best use of the intelligence is
 2 vital to the investigation. A nominated SPOC has been
 3 identified within the FIB to manage the intelligence
 4 flow, DC Simon Lapniewski. He will also facilitate any
 5 overt enquiries required by the operational team to
 6 protect the covert nature of the investigation."
 7 A. Yes.
 8 Q. I think you would disagree that you were the nominated
 9 SPOC that had been identified to manage the intelligence
 10 flow?
 11 A. Well that wasn't our role. There was a role within the
 12 FIB for intelligence flow, but that is a different
 13 department within the FIB. We don't manage flow, it is
 14 a snapshot of time of what is held on the systems, and
 15 that is done by other means.
 16 Q. There are two areas here, firstly you were not the
 17 nominated SPOC and in any event you didn't manage the
 18 intelligence flow?
 19 A. No, sir. I did do -- it was not really an overt
 20 enquiry, it was an enquiry into an NBTC check.
 21 Q. I am going to come to that in a moment, just sticking
 22 with these two things at the moment.
 23 Do you know how DI Cousen had come to this
 24 understanding here? Of course we will ask him in due
 25 course.

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<p>1 A. My belief --</p> <p>2 Q. Yes.</p> <p>3 A. -- would be it is quite a loose terminology, probably</p> <p>4 used quite often within Greater Manchester Police.</p> <p>5 Q. What, SPOC?</p> <p>6 A. Yes, "SPOC". It might not necessarily mean single point</p> <p>7 of contact, but it is better than calling people a POC</p> <p>8 I suppose, a point of contact, if I am available I have</p> <p>9 had some sort of continuity there.</p> <p>10 Q. Insofar as it suggests that as well as being a point of</p> <p>11 contact, you will manage the intelligence flow, you were</p> <p>12 never told that?</p> <p>13 A. No.</p> <p>14 Q. That was not something that you did within your section</p> <p>15 of the FIB?</p> <p>16 A. Exactly, if I was told that, I would have specifically</p> <p>17 said, "We don't do that", I can -- point them in the</p> <p>18 right direction if they were -- I am sure Mr Cousen</p> <p>19 knows how the intelligence gets to him, and it is from</p> <p>20 the FIB, but it is just not from --</p> <p>21 Q. It is not from your section?</p> <p>22 A. No, it is called the ICU at the time.</p> <p>23 Q. In terms of the next sentence:</p> <p>24 "He will also facilitate any overt enquiries."</p> <p>25 Other than the passport issue, did you facilitate</p> <p style="text-align: center;">Page 117</p>	<p>1 an address there but it has been redacted], occupation:</p> <p>2 manager ..."</p> <p>3 Then again it looks like a telephone number which</p> <p>4 has again been redacted.</p> <p>5 Q. Okay, thank you.</p> <p>6 That was the only other thing you really did,</p> <p>7 profiles, attending the meeting and this passport</p> <p>8 enquiry?</p> <p>9 A. That is what I recall, yes. Like I say if I was a SPOC</p> <p>10 I would have started one of these from day one. In my</p> <p>11 investigations I would have one of these documents. As</p> <p>12 it clearly says, I started that on the 12th.</p> <p>13 Q. The same day as the meeting?</p> <p>14 A. The same day as the meeting, yes.</p> <p>15 Q. Okay then, you were asked to create subject profiles for</p> <p>16 Operation Shire, including one for David Totton, as we</p> <p>17 have seen already?</p> <p>18 A. Yes.</p> <p>19 Q. You, I think we can see, started it on 10 October 2011.</p> <p>20 If we just look at your witness statement, please, which</p> <p>21 is page 4 in our bundle, this is the witness statement</p> <p>22 of 30 July 2014, we can see four lines up from the</p> <p>23 bottom --</p> <p>24 THE CHAIRMAN: I do apologise, what was the page reference?</p> <p>25 MR BEER: Page 4 of the witness's bundle, please.</p> <p style="text-align: center;">Page 119</p>
<p>1 any overt enquiries?</p> <p>2 A. Not that I recall.</p> <p>3 Q. Thank you, and then just dealing with -- we can put that</p> <p>4 file away, thank you, C, dealing with the passport</p> <p>5 issue, if we go to page 179 of your file, which is your</p> <p>6 notebook, again.</p> <p>7 A. Yes, sir.</p> <p>8 Q. If you can read it again for us, please?</p> <p>9 A. It says:</p> <p>10 "On 3 January 2012 (NBTC Totton)."</p> <p>11 Q. What is NBTC?</p> <p>12 A. National Border Targeting Centre.</p> <p>13 Q. What is the NBTC?</p> <p>14 A. What is it? It manages the alerts and the movements of</p> <p>15 passengers through ports and we are able to request</p> <p>16 information on an individual to ascertain their travel,</p> <p>17 perhaps by aeroplane or ferry.</p> <p>18 Q. Thank you, carry on.</p> <p>19 A. "Submitted passport enquiry, NBTC movements and placed</p> <p>20 on a watch list for David Totton. Informed he was</p> <p>21 abroad with a female called Sophie Thompson, born</p> <p>22 14/09/89. FIS [that's force intelligence system] shows</p> <p>23 that she reported a fraud at the Living Room,</p> <p>24 80 Deansgate [there's a crime number of 091956E/11 which</p> <p>25 refers] on 13 May 2011 she gave address of [there is</p> <p style="text-align: center;">Page 118</p>	<p>1 A. Yes, sir.</p> <p>2 Q. Four lines up from the bottom:</p> <p>3 "On 11 October 2011 I completed the profile for</p> <p>4 David Totton and this was forwarded to the robbery</p> <p>5 squad, namely DI Cousen and DS Hurst."</p> <p>6 You started it on the 10th, completed on the</p> <p>7 11 October?</p> <p>8 A. Yes, sir.</p> <p>9 Q. I think as part of the IPCC's investigation, you were</p> <p>10 asked to look for all versions of the subject profile</p> <p>11 for David Totton within the Force Intelligence Branch,</p> <p>12 is that right?</p> <p>13 A. That's correct, sir, yes.</p> <p>14 Q. We can see over the page, here, at page 5, top of the</p> <p>15 page, you say:</p> <p>16 "I have recently checked the profiles held on</p> <p>17 David Totton and I have found that there are four</p> <p>18 versions on the FIB ..."</p> <p>19 I can't see what that says, is that S: drive?</p> <p>20 Something drive, a drive?</p> <p>21 A. Yes.</p> <p>22 Q. It is badly printed, but a drive within FIB, it doesn't</p> <p>23 matter which.</p> <p>24 A. Yes.</p> <p>25 Q. Then you set them out, four versions, and I just want to</p> <p style="text-align: center;">Page 120</p>

<p>1 go through them. I have put some brackets around mine 2 so I can see which one relates to which? 3 You say: 4 "Version 1 was dated 29 July 2010 with the 5 originator being 66710, I don't know who the officer is 6 but it is likely to be a civilian member of staff, 7 either with the FIB or a division." 8 Is that because of their number? 9 A. Yes, sir, yes. 10 Q. "This profile predated mine, but I didn't use this for 11 my profile as it wasn't suitable." 12 We can put that to one side, can we? 13 A. Yes, sir. 14 Q. That is version one and you have already said I think 15 earlier in the statement that you started from scratch; 16 is that right? 17 A. As far as I recall, yes. I tend to do with my profiles, 18 yes. 19 Q. Just look at the previous page, page 4. Five lines up: 20 "As I always do, I started the profile from scratch 21 on 10 October." 22 A. Yes, I would have started from scratch. I might have 23 used a little bit from that previous profile if it was 24 relevant but the vast majority would have been my own 25 work, so to speak.</p> <p style="text-align: center;">Page 121</p>	<p>1 Q. Now, I don't think -- 2 A. Sorry, sorry, on version 2, which is -- that is 3 version 1. 4 Can I just -- where is version two. 5 Q. It depends which version you are talking about. If you 6 are talking about one dated 3 January, we will come to 7 that in a second but if you just bear with me -- 8 A. Sorry. 9 Q. -- for a moment. 10 A. Sorry, yes. 11 Q. No, that is all right. 12 I don't think you produced what you are describing 13 here as version 2 for the IPCC in this statement. If 14 you just look, it doesn't say I now produce it. 15 A. Right. No. 16 Q. No? 17 A. No. 18 Q. Presumably that is because you were not asked to? 19 A. Sorry, no, I wasn't. 20 Q. All right. 21 A. There is a version 2 that does say -- 22 Q. Yes, I am going to come to that in a moment. 23 You haven't produced in this statement either the 24 updated version of 3 January 2012. I am not so worried 25 about the modified one because that was after</p> <p style="text-align: center;">Page 123</p>
<p>1 Q. Okay. 2 Going back to page 5, you say: 3 "Version 2 is dated 10 October 2011, the originator 4 is shown as being me." 5 Just stopping there with the words "as being me". 6 A. Yes. 7 Q. Can we look, please at page 9 of this bundle, for people 8 looking that is F/33, and run right through to page 21, 9 that is the subject profile that you are there talking 10 about? 11 A. Yes, sir. 12 Q. Produced on 10 October, last updated 11 October? 13 A. Yes, sir. 14 Q. It is I think 13 pages long? 15 A. Yes, sir, yes. 16 Q. Then going back to your witness statement you say: 17 "... and the profile shows as being last updated on 18 3 January 2012 and modified on 6 March 2012." 19 A. Yes, sir. 20 Q. Those two facts, that it was updated on 3 January and 21 modified on 6 January, are not shown on the face of the 22 document that you have produced, are they? 23 A. Not on that version. 24 Q. No. 25 A. No.</p> <p style="text-align: center;">Page 122</p>	<p>1 Mr Grainger's death, but you don't produce in this 2 statement the 3 January 2012 one, do you? 3 A. No, I don't. No. 4 Q. The reason for asking is that one of the criticisms that 5 had been laid at the door of GMP, indeed by the IPCC, 6 was that these profiles had not been updated. But 7 I think as we are going to see, in fact David Totton's 8 was updated? 9 A. It was, yes. 10 Q. Okay. 11 It might be that the IPCC came to that conclusion 12 because of something that you said in your statement 13 here and I just want to explore that. If you look at 14 the foot of the page, page 5, you say: 15 "I can say to the best of my knowledge that I didn't 16 update, nor did anyone in the FIB." 17 A. Yes, that is incorrect. I made a mistake there, sir. 18 Q. The sentence before that is: 19 "I have been asked if it can be concluded that the 20 profile I produced was not further updated after 21 11 October 2011. I can say to the best of my knowledge 22 that I didn't update, nor did anyone in the FIB." 23 Yes? 24 A. Yes, that is incorrect and I have provided a further 25 statement to try and correct that mistake.</p> <p style="text-align: center;">Page 124</p>

<p>1 Q. It may be that that is the basis for the criticism that 2 had been levied that there was no updating.</p> <p>3 A. It was a bit confusing, there were a number of profiles 4 about, and it was a mistake that I did update it.</p> <p>5 Q. It is a bit odd the statement, because you have said on 6 the very same page that the profile had been updated on 7 3 January?</p> <p>8 A. I just -- I didn't recall at the time that it was me, 9 having found, we were going through a bit of a -- it 10 sounds like I have lost -- the dog's chewed my homework 11 but we were in the process of moving building and stuff 12 and some of my stuff got lost and it was hard to recall, 13 because with all due respect to Mr Grainger's family at 14 the time, this was a fairly routine job that it was 15 producing a profile, it was only because of what has 16 happened that, you know, I have had to dig into and try 17 and find out exactly what part I had to play in this, in 18 this enquiry, this operation.</p> <p>19 Q. I think we now have the updated profile and I want to, 20 with you, if I may, look at it to confirm or refute my 21 belief that this is an updated profile. It is page 180 22 within your bundle, which is F/258.</p> <p>23 Can you see, between pages F/258 and 270 there is 24 a profile which says it was last updated on 25 3 January 2012.</p> <p style="text-align: center;">Page 125</p>	<p>1 vehicle recovery.</p> <p>2 Q. All right:</p> <p>3 "As part of an ongoing fraud enquiry, [blank] stated 4 she was aware that Totton was struggling to pay the 5 finance, keeper since October 2010 has told DVLA no 6 longer keeper."</p> <p>7 That is the first, it is an updated information 8 about a vehicle to which he has access. Yes?</p> <p>9 A. Yes, sir.</p> <p>10 Q. Then the second one that I can see, the second and only 11 difference is, if you look on the original profile, at 12 page 20, that is F/44, and then look at page 190, which 13 is F/268, namely section 11 of the intelligence summary, 14 can you see that items on page 268, items 1, 2, 3, 4, 5, 15 6, 7, 8, 9 and 10 are new?</p> <p>16 A. They are, sir, yes.</p> <p>17 Q. That is in fact because they all postdate the date of 18 preparation of your first version of the subject 19 profile?</p> <p>20 A. Yes, sir, they do.</p> <p>21 Q. You have updated the intelligence summary by adding in 22 items 1 to 10, retaining the previous items concerning 23 essentially sightings and other intelligence concerning 24 David Totton?</p> <p>25 A. Yes, sir.</p> <p style="text-align: center;">Page 127</p>
<p>1 A. Sorry, yes, sir, I can.</p> <p>2 Q. Again, it is 13 pages long.</p> <p>3 I have looked at each of the profiles alongside each 4 other and looked for sameness and difference. Maybe if 5 we can just conduct that exercise together, so keep 6 a finger in 187, and compare it to the profile that we 7 were previously looking at at -- thank you sir, 17.</p> <p>8 For people following that, is F/41 versus F/265.</p> <p>9 In the box "Access to vehicles", so can you see in 10 the earlier dated one, section 4 "Access to vehicles"?</p> <p>11 A. Yes, sir.</p> <p>12 Q. There is some writing in red, that also appears on 187 13 but there is some additional intelligence in relation to 14 Mr Totton's access to an Audi MW5 9VDE, which says, 15 "Seen parked in driveway of 8 Thanet Close, NB FWIN". 16 What is FWIN?</p> <p>17 A. Sorry, it is force wide incident number, it is like 18 a log that's created when a job is reported.</p> <p>19 Q. Refers to David Totton's vehicle an Audi VRM, and the 20 number I have just given, being reported as 21 an outstanding stolen from outside and then: 22 "Address of 8 Thanet Close, Lower Broughton, the 23 vehicle was reported by AVCIS ..." 24 What is AVCIS?</p> <p>25 A. A vehicle -- I think, I am not too sure. I think it is</p> <p style="text-align: center;">Page 126</p>	<p>1 Q. They all arise after the date of preparation of the 2 first draft of the subject profile?</p> <p>3 A. Yes, sir.</p> <p>4 Q. Thank you.</p> <p>5 Going back to page 5 of the bundle, your witness 6 statement, you said, reading on, it is about 10 lines 7 down from the top:</p> <p>8 "I can't say who updated the profile on 3 January or 9 what form the update took, but it indicates [that is the 10 system indicates] that it was disseminated to Detective 11 Sergeant Hurst."</p> <p>12 I think we can change that to, "I can say who 13 updated the profile, it was me". Yes?</p> <p>14 A. Yes, I accept I have provided a statement to that 15 effect.</p> <p>16 Q. You can say what form the update took, because we have 17 just looked at the two changes?</p> <p>18 A. Yes, sir.</p> <p>19 Q. Thank you.</p> <p>20 The extra statement to which you referred, if we go 21 forward to page 7, your statement of 9 September 2014, 22 in the middle paragraph you say: 23 "I last updated this profile on 3 January 2012 and 24 disseminated this to supervision within the SCD 25 concerned with Operation Shire, namely DI Cousen and</p> <p style="text-align: center;">Page 128</p>

1 DS Hurst."
 2 **A. Yes, sir.**
 3 Q. Was that the correction you were talking about?
 4 **A. It is, sir, yes.**
 5 Q. Okay.
 6 Going back to the first statement then at page 5,
 7 reading from the eight lines down or so, you say that:
 8 "The profile shows as being last updated on
 9 3 January 2012 and modified on 6 March 2012."
 10 What modification took place?
 11 **A. I would have to refer to that particular profile, sir.**
 12 **Have we got a copy of that?**
 13 Q. No. All we have is the one that was formally produced
 14 by you, which was the 11 October one. We found the
 15 3 January one, because it was attached to somebody's
 16 email. We don't have the 6 March one.
 17 **A. Right.**
 18 Q. Can you remember --
 19 **A. That was emailed to -- it was a request of my**
 20 **supervision DS Russ Kelly to produce that, update it and**
 21 **I think it went to Mr Millett.**
 22 Q. Who is Mr Millett?
 23 **A. A superintendent I think his rank was at the time, he**
 24 **has retired now, Mr Millett.**
 25 Q. What job did he do?

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1 **A. I think Mr Heywood might have got it, an ACC,**
 2 **Mr Heywood.**
 3 Q. Right.
 4 **A. He was at the time, Mr Millett, he was like the -- he**
 5 **was like the lead in like the covert section of the SCD.**
 6 Q. Right.
 7 **A. It was without actually -- as I say, I have not seen**
 8 **that for a long time, that document, but it would have**
 9 **been an update from when I last updated it, so on**
 10 **3 January, between that date and 6 March, and what other**
 11 **intelligence would have come through similar to what**
 12 **I have done on that update when we have gone through.**
 13 Q. This was three days after Mr Grainger had died, three
 14 days after Mr Totton had been arrested with Mr Rimmer.
 15 **A. Yes, I don't know what the reason was, why they wanted**
 16 **that.**
 17 Q. Would the act of emailing it cause it to be shown on the
 18 drive as being updated?
 19 **A. Well, it was written on -- I am sure I wrote it on that**
 20 **it was updated on that date. And it was -- yes, I can't**
 21 **say what date, it wouldn't show the exact date of when**
 22 **it was updated other than what I had written on the**
 23 **front of the profile.**
 24 Q. I am not following.
 25 **A. No, I am not -- sorry.**

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1 Q. If you just look down in your statement, about -- we are
 2 dealing with something else here.
 3 **A. Yes.**
 4 Q. About, in the middle of the hole-punches, where you say:
 5 "However [you are talking about version 3 here] the
 6 profile also shows an update on 4 March 2012. This took
 7 the form of me emailing the profile to DSU Millett, ACC
 8 Heywood, Superintendent Miller and Mr Shackleton."
 9 The way you have linked those two together, "The
 10 profile shows an update on 4 March, this took the form
 11 of me emailing it", might suggest that the act of
 12 emailing a profile causes it to be shown as modified or
 13 updated. Do you see what I mean?
 14 **A. No, I don't think it would show that.**
 15 Q. Going back to the version 2 that we are talking about
 16 then, where in the eighth line it says that version 2
 17 was modified on 6 March 2012, can you help us with what
 18 modifications were made after Mr Grainger's death and
 19 after Mr Totton and Mr Travers's arrest?
 20 **A. Yes, I don't know why it says "modified". I think what**
 21 **I have referred to there is -- yes, is when I have**
 22 **looked into the FIB folders for David Totton and tried**
 23 **to seek clarification, because it is very unclear,**
 24 **because it is a Word document, that obviously other**
 25 **people could update that, if you hover over that file,**

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1 **within, I think it is the Y: drive it would give you**
 2 **an indication of when it was updated. So, if you like,**
 3 **it comes up with a little snapshot, last modified and**
 4 **that is what it said when I looked into that folder at**
 5 **the time, it was saying last modified so that suggests**
 6 **somebody has been in it and maybe made some sort of**
 7 **alteration. It might be that they have just clicked on**
 8 **something but when they have closed it, not made any**
 9 **difference it is just somebody has looked at that**
 10 **profile on that date, is what it indicates.**
 11 Q. So it is a bit like when you are doing a Word properties
 12 check, if you have opened a document it sometimes says
 13 "Last modified on", even though you have not actually
 14 modified it?
 15 **A. That's correct, sir, yes.**
 16 Q. Okay.
 17 **A. So it is the 4th -- the one on the 4th is when I was**
 18 **requested to send that.**
 19 Q. I am going to come to that one in a moment.
 20 We are still dealing for the moment with version 2
 21 at the moment; we have 3 and 4 to go yet.
 22 Moving to version 3, you say:
 23 "Version 3 is dated ..."
 24 THE CHAIRMAN: I'm sorry to interrupt. I think we will to
 25 take a break at some point. If you want to carry on and

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<p>1 finish this topic first by all means, I am just mindful 2 we have been going about an hour and a quarter. 3 MR BEER: There is a lot more to go, I am sorry I got 4 overexcited with version 2. If we could take a break 5 now. 6 THE CHAIRMAN: Five minutes. 7 (3.15 pm) 8 (A short adjournment) 9 (3.22 pm) 10 MR BEER: Thank you, sir. 11 Mr Lapniewski, we were looking at the various 12 versions of the subject profiles. 13 A. Yes. 14 Q. I was about to turn to version 3. You say in your 15 statement at page 5, this is the statement for those 16 that are following of 30 October 2014: 17 "Version 3 is dated 10 October and the originator is 18 shown as being me. This profile shows it being updated 19 on 26 March 2012. This the last update. However the 20 profile also shows an update on 4 March 2012." 21 Both of those dates are after Mr Grainger died and 22 after Mr Totton was arrested. 23 Then you say, as I have read already, this took the 24 form of me emailing the profile to Messrs Millett, 25 Heywood, Miller and Shackleton.</p> <p style="text-align: center;">Page 133</p>	<p>1 statement dated 5 March 2014, you say: 2 "In my previous witness statement I referred to the 3 following document which is now produced as follows: 4 subject profile, David Totton, produced as document 7." 5 Which of the three versions did you produce? 6 A. According to the page 5 it would have been version ... 7 (Pause) 8 Q. It doesn't really fit any of those, does it? 9 A. No, sir. 10 Q. No. But in any event, we have one which was produced as 11 IPCC document 7 which was dated 10 October and updated 12 on 11 October. We have discovered the other one of 13 3 January 2012, because it was an attachment to 14 somebody's email? 15 A. I suspect what, to try and clear that matter up there 16 is, the version I created, that I sent to DS Hurst, 17 I didn't at that time put that profile in the FIB 18 folder, because it was a request of an ongoing live 19 operation, so other people can access the FIB folder. 20 Q. Right. 21 A. That may have accessed it, maybe given it to someone 22 else without my permission and I just wanted to protect 23 that operation, make sure they only had that version so 24 it might never have got into the FIB folder, if that 25 helps.</p> <p style="text-align: center;">Page 135</p>
<p>1 A. Yes, sir. 2 Q. You think that the update of 4 March for version 3 3 showed as updated just because you had accessed it and 4 emailed it? 5 A. Yes, sir. 6 Q. Okay. 7 Then: 8 "Version 4 is dated 10 October 2011 and shows the 9 originator as Beth Hargreaves, who works in the FIB. 10 This profile shows it last being updated on 11 26 April 2013." 12 Yes? 13 A. Yes, sir. 14 Q. There are four versions of the subject profile in 15 summary; is that right? 16 A. That's right, sir. 17 Q. We can ignore version 1, because it predated these 18 events and was prepared by somebody else -- 19 A. Yes, sir. 20 Q. -- looking to be for a different purpose? 21 A. Yes, sir. 22 Q. For your profile, all of which were dated 10 October, 23 there are three versions of it on the Y: drive? 24 A. Yes, sir. 25 Q. If we go back a few pages, to page 3, this is a witness</p> <p style="text-align: center;">Page 134</p>	<p>1 Q. Yes, that does help a little bit. 2 I can understand why there might be one version of 3 the profile that had been updated a number of times, but 4 I can't understand at the moment why there are three 5 versions, ie 2, 3 and 4, all of which were started on 6 10 October and have had various updates or modifications 7 made to them, but that may not matter. 8 Getting down to the specifics of Mr Totton's 9 profile, I think we have seen already that there were 10 there was no firearms marker for David Totton on the 11 PNC. 12 A. Yes. 13 Q. Did you, when preparing that, attach any significance to 14 the absence of a firearms marker for him on the PNC? 15 A. Can I refer to the profile? 16 Q. Yes, exactly. It starts at page 9. 17 A. I did, yes. I made reference to an incident where he 18 received a conditional discharge for 12 months and 19 a fine of £50, where he has made the shape of a gun with 20 his right hand, in reference to a public order offence 21 back in August 1999. 22 THE CHAIRMAN: Sorry, where is that? 23 MR BEER: Sir, that is at the foot of page 11, F/35. 24 THE CHAIRMAN: Yes. 25 MR BEER: So in 1999, Mr Totton made a verbal threat to</p> <p style="text-align: center;">Page 136</p>

<p>1 return to a nightclub where he had been involved in 2 a fight, threatened to return to the club with a gun and 3 kill the doorman and made the shape of a gun with his 4 right hand. The threat was made in the presence of 5 a plainclothes policeman and he received a conditional 6 discharge of 12 months and a fine of £50 for it, yes? 7 A. Yes, sir. 8 Q. Then you have written: 9 "Target does not hold a firearms marker on the PNC. 10 Target does hold a firearms marker on the local system 11 and the following intelligence supports this ..." 12 And you set this out. 13 Over the page, to page 12, about four lines in you 14 say: 15 "The following crimes could also be considered, 16 although Totton was never convicted hence no PNC 17 marker." 18 That tends to suggest that you thought that PNC 19 markers for firearms only arose on conviction. 20 A. Yes, sir. 21 Q. Can we look at another part of Mr Totton's profile at 22 page 19. Where you are dealing with one of his key 23 associates, Mr Grainger. On page 19, that is F/43, you 24 say: 25 "Grainger was arrested in 2006 for conspiracy to</p> <p style="text-align: center;">Page 137</p>	<p>1 research profile, page 248 in this bundle. Which for 2 those following, is K/789. I think you also prepared 3 this. 4 A. Apologies, sir, what is -- 5 Q. 248 in the big red letters. Are you there? 6 A. Yes, sir. 7 Q. This is at 248 the profile that you created for 8 Jamie Corkovic. If we can go within it to page 257, 9 which is page K/798. 10 A. Yes, sir. 11 Q. You research the key associates for Jamie Corkovic and 12 you have listed them as Aaron Brady/Corkovic, yes? 13 A. Yes, sir. 14 Q. Then another five people who have all been redacted out, 15 but we know that none of those are David Totton, 16 Robert Rimmer or Anthony Grainger, because otherwise 17 they would be unredacted, okay? 18 A. Okay, sir. 19 Q. Thank you. 20 I think you were also responsible for creating the 21 profile for Paul Corkovic, same bundle, starts at 22 page 262, that is K/803. 23 A. Yes, sir. 24 Q. The key associates of Paul Corkovic are on page 270 and 25 271, K/811 and 812, and there are three associates, one</p> <p style="text-align: center;">Page 139</p>
<p>1 commit armed robberies at various financial institutions 2 in GMP. Totton along with Grainger, Aaron Travers and 3 Jay Donaldson were eliminated, David Murphy and 4 Jason Barker were convicted." 5 Does "eliminated" mean that a positive decision was 6 taken that they did not commit the offence? 7 A. That is -- yes, that is how I understand "eliminated" to 8 mean, sir. 9 Q. Does that mean, on your research, that Mr Totton was 10 eliminated for all and any 2006 robbery offences, 11 included in this arrest for conspiracy? 12 A. Yes, sir. 13 Q. Thank you. The key associates of Mr Totton were 14 researched by you on pages 17 and 18. 15 A. Yes. 16 Q. At the foot of 17, yes? 17 A. Yes, sir. 18 Q. On to 18 and the key associates are two, Craig Cox and 19 Anthony Grainger? 20 A. Yes, sir. 21 Q. His key associates were not therefore on your research 22 Jamie or Paul Corkovic? 23 A. No, sir. 24 Q. Okay. 25 Then can we look, please at Jamie Corkovic's</p> <p style="text-align: center;">Page 138</p>	<p>1 blacked out, and then Jamie Corkovic and 2 Aaron Brady/Corkovic, so we can see there are three but 3 they did not include David Totton, Robert Rimmer or 4 Anthony Grainger, yes? 5 A. Yes, sir. 6 Q. Lastly, please, Anthony Grainger's profile, I think that 7 is in the other bundle, that's right. 8 Sir, it is in your bundle, tab 2. 9 THE CHAIRMAN: Yes. 10 MR BEER: At page 6. I am not sure that PC Griffiths 11 actually created an associates section. If you just 12 look through it. 13 A. Sure. (Pause) 14 I can't see that. 15 Q. You cannot see any associates in there? 16 A. No. 17 Q. On the information that we have looked at a moment ago, 18 we can see that you thought on your research that the 19 key associates of David Totton were Craig Cox and 20 Anthony Grainger, not Jamie or Paul Corkovic and then 21 the other way round, the Corkovics, their key associates 22 were not David Totton, Robert Rimmer or 23 Anthony Grainger? 24 A. That is what I have put, sir, yes. 25 Q. Then lastly from me, were you involved at all in the</p> <p style="text-align: center;">Page 140</p>

1 provision of PC Griffiths's subject profile that had
 2 been created for a different operation, Operation
 3 Samana?
 4 **A. No, I was never involved in that, sir, no.**
 5 Q. Were you involved at all in the transmission of it over
 6 to Operation Shire?
 7 **A. No, sir.**
 8 Q. Did you hear anything about it?
 9 **A. No, sir.**
 10 MR BEER: Yes, thank you very much. They are all my
 11 questions.
 12 **A. Thank you, sir.**
 13 THE CHAIRMAN: Anything, Mr Thomas?
 14 MR THOMAS: Sir, no.
 15 THE CHAIRMAN: Thank you.
 16 Ms Murphy?
 17 MS MURPHY: No thank you, sir.
 18 THE CHAIRMAN: Mr Davies?
 19 MR DAVIES: No, thank you.
 20 THE CHAIRMAN: Mrs Barton?
 21 MS BARTON: No, thank you.
 22 THE CHAIRMAN: Ms Whyte?
 23 MS WHYTE: No, thank you.
 24
 25

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1 Questions from THE CHAIRMAN
 2 THE CHAIRMAN: There is just one matter. If can just make
 3 sure I have my notebook, can I ask you to look at
 4 page 9, please, in your bundle. You will remember being
 5 asked by Mr Beer about the -- do you have it?
 6 **A. The binder on here --**
 7 THE CHAIRMAN: It should be the beginning of your folder.
 8 That is it.
 9 **A. Yes.**
 10 THE CHAIRMAN: You remember being asked about the two boxes
 11 and the contradiction between the contents, about
 12 insofar as they concerned dissemination, further
 13 dissemination?
 14 **A. Yes, your Honour, yes.**
 15 THE CHAIRMAN: I just wanted to know whether the template
 16 that you referred to was completely blank or whether any
 17 part of it was already populated with any form of
 18 wording, and if so, particularly this page, if so what
 19 bit?
 20 **A. Yes, it was -- it is a -- it starts off with a Word**
 21 **document obviously which is a nominal template, with**
 22 **regards to these two boxes, the bits obviously,**
 23 **obviously the top bit I fill with my details, the date**
 24 **et cetera, but that bit there, no, that would stay the**
 25 **same.**

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1 THE CHAIRMAN: Sorry, which bit?
 2 **A. Sorry, you referred to maybe the middle box where I've**
 3 **got my name, DC Lapniewski, so with the wording where it**
 4 **says "Any further dissemination of this profile".**
 5 THE CHAIRMAN: Yes?
 6 **A. That would stay the same.**
 7 THE CHAIRMAN: You mean that was already there before you --
 8 that is on the template pre-entered?
 9 **A. Yes.**
 10 THE CHAIRMAN: What about the bit underneath, the box
 11 underneath?
 12 **A. Apart from where it is in red, that was already there.**
 13 THE CHAIRMAN: I see, so in fact both sentences were already
 14 on the template, is that what you are saying?
 15 **A. Yes, your Honour, yes.**
 16 THE CHAIRMAN: All you would do in relation to those
 17 particular sentences is insert the reference to the
 18 robbery unit and DS Hurst in red?
 19 **A. Yes, your Honour.**
 20 THE CHAIRMAN: Thank you.
 21 I don't know whether anybody wants to ask anything
 22 arising out of them? It may not be very important.
 23 Thank you.
 24 Thank you very much Mr Lapniewski for helping the
 25 Inquiry and you are now free to go.

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1 MR BEER: Can we call Russell Kelly, please.
 2 THE CHAIRMAN: Thank you.
 3 He is on his way, I am told.
 4 MR RUSSELL KELLY (sworn)
 5 THE CHAIRMAN: Thank you. You can stand or sit down as you
 6 choose, all right.
 7 **A. Thank you.**
 8
 9 Questions from MR BEER
 10 MR BEER: Mr Kelly, my name is Jason Beer and along with
 11 Ms Cartwright I ask questions on behalf of the Inquiry.
 12 Can you open up a bundle which should have your name on
 13 the spine, please.
 14 **A. I've got Simon and Rachel's on.**
 15 MS CARTWRIGHT: Sorry, it is my fault.
 16 THE CHAIRMAN: Mr Kelly's bundle. (Handed)
 17 **A. Thank you.**
 18 MR BEER: If you open it, please, at page 1, you should see
 19 a witness statement dated 18 July 2014, between pages 1
 20 and 4.
 21 **A. Yes, sir.**
 22 Q. Then between pages 5 and 9, you should see a witness
 23 statement dated 2 December 2014.
 24 **A. Yes, sir.**
 25 Q. Both in your name?

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1 **A. Yes, sir.**
 2 Q. Are the contents of both of those statements true to the
 3 best of your knowledge and belief?
 4 **A. Yes, sir.**
 5 Q. Thank you.
 6 Can you tell us something about your background,
 7 please, when did you join the police service?
 8 **A. On 6 December 1993, so I have done 23 and a bit years.**
 9 Q. By 2011, you had done about?
 10 **A. You are testing my maths now aren't you, sir? 18 years.**
 11 Q. 18 years.
 12 You currently hold which rank.
 13 **A. That of sergeant.**
 14 Q. I think that was the same, detective sergeant, back in
 15 the back part of 2011. Is that right?
 16 **A. Yes, sir.**
 17 Q. I think then you worked in the FIB?
 18 **A. I did at that time, sir, yes.**
 19 Q. What was your role in the FIB at that time, so late
 20 2011/early 2012?
 21 **A. I was the supervisor to a team of I think 12 -- should**
 22 **have been 12 but usually probably about 10 detectives**
 23 **and we would look to develop intelligence, predominantly**
 24 **around serious and organised crime and to support force**
 25 **investigations and force operations around what you**

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1 **would class as serious and organised crime.**
 2 Q. I have seen the sign off block of one of your emails
 3 says that you were in the investigative support
 4 division?
 5 **A. That what it was called at the time, sir, yes.**
 6 Q. Is that part of the intelligence development section?
 7 **A. Yes, the intelligence development section, yes, is part**
 8 **of the investigative support division.**
 9 Q. Okay, so the intelligence development section within the
 10 intelligence bureau is part of the intelligence support
 11 division, which in turn is part of the FIB?
 12 **A. No. Right. Sorry. The investigative support division**
 13 **was a collection of different aspects of the force --**
 14 THE CHAIRMAN: Just take this -- it will help me if you take
 15 this slowly.
 16 **A. Sorry.**
 17 THE CHAIRMAN: Then we will not have to go through it
 18 several times. Start again, please.
 19 **A. We have the investigative support division.**
 20 THE CHAIRMAN: Hang on. Yes.
 21 **A. The Force Intelligence Bureau --**
 22 THE CHAIRMAN: Yes.
 23 **A. -- was part of the division, the investigative support**
 24 **division.**
 25 THE CHAIRMAN: Yes.

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1 **A. Then my section, the intelligence development unit, was**
 2 **part of the FIB, the Force Intelligence Bureau.**
 3 THE CHAIRMAN: I have it, thank you.
 4 MR BEER: Thank you.
 5 The smallest part of a Venn diagram would have
 6 within it "intelligence development section"?
 7 **A. Yes.**
 8 Q. Thank you.
 9 There was you as the sergeant, were you in charge of
 10 it?
 11 **A. I was the immediate line manager, yes, there was**
 12 **a detective inspector.**
 13 Q. Amongst the 10 or 12 people that you supervised, did
 14 they include Rachel Griffiths, Simon Lapniewski and
 15 Karen James?
 16 **A. Yes, sir.**
 17 Q. Did your section operate a system of having single
 18 points of contact with significant investigations?
 19 **A. If we could achieve that, yes, that was -- that would be**
 20 **the aim, I suppose, to have a single point of contact**
 21 **who understood the investigation. Around about that**
 22 **time, or just prior to that, there had been quite a lot**
 23 **of change within the FIB as a result of the cost saving**
 24 **implementations that had to be made by the force, so it**
 25 **was at that time that there was a lot of change, a lot**

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1 **of staff had been redeployed or left, and we were**
 2 **finding it more difficult to allocate one person to one**
 3 **investigation, just because of the sheer numbers so we**
 4 **would then -- we were sort of moving to a point then**
 5 **when we would -- if we could have the same person we**
 6 **would, but we couldn't guarantee it and it may be that**
 7 **another officer would be allocated and it would be done**
 8 **on a case-by-case basis.**
 9 Q. If there was a SPOC, what were the responsibilities of
 10 a SPOC?
 11 **A. On the whole to support the investigation. It tended to**
 12 **be creations of intelligence research and profiles**
 13 **around individuals, or it could be work around**
 14 **a vehicle, or trying to locate an address, things like**
 15 **that.**
 16 Q. Presumably the idea of a single point of contact is,
 17 firstly, so that the officer within the section builds
 18 up some knowledge of the investigation?
 19 **A. Ideally, yes.**
 20 Q. Can be briefed up about it at its inception once and
 21 different officers do not each have to be briefed up
 22 about the investigation as it proceeds?
 23 **A. Exactly.**
 24 Q. Accordingly, if the investigating team wish to make
 25 contact with the section, they make contact through the

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1 SPOC?
 2 **A. Yes.**
 3 Q. Can I run through at a high level of generality, please,
 4 the systems or sources of data available to the section,
 5 when creating subject profiles.
 6 Firstly the police national computer. Can you in
 7 high level overview describe the police national
 8 computer.
 9 **A. Okay, sir.**
 10 **The police national computer, PNC, is a database**
 11 **available to all UK police forces --**
 12 Q. Yes.
 13 **A. -- it will contain information around individuals,**
 14 **vehicles, property, there is a section --**
 15 Q. When you say "around" you mean "about"?
 16 **A. Sorry, sir?**
 17 Q. You mean it will contain information about individuals?
 18 **A. Sorry, yes.**
 19 Q. Sorry.
 20 **A. Then if we take individuals, if a person is arrested,**
 21 **charged and/or convicted all that information will be**
 22 **recorded on the national computer system, it will give**
 23 **you the outcomes of trials if they were found guilty/not**
 24 **guilty.**
 25 Q. Thank you.

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1 Can you describe please the use of the PNC?
 2 **A. We would use it to -- you could have warning markers on**
 3 **the PNC, so if they had been charged and convicted of**
 4 **say a violent offence, they may have an information**
 5 **marker that showed you that they had the potential,**
 6 **propensity, to be violent.**
 7 Q. Just stopping there, we are going to come back to it
 8 later --
 9 **A. Okay.**
 10 Q. Did you understand warning markers for things like
 11 violence and firearms that were on the PNC to be only
 12 conviction based?
 13 **A. I thought it was potentially if they had been not**
 14 **necessarily convicted but if they had been arrested and**
 15 **charged.**
 16 Q. Okay.
 17 **A. That was my understanding.**
 18 Q. Okay, I mean that is right --
 19 **A. Right.**
 20 Q. -- it includes cases where people were arrested but not
 21 charged or charged and not convicted.
 22 Yes, I interrupted you.
 23 **A. Sorry.**
 24 Q. The use of the PNC, you were describing the facility to
 25 use the warning markers that were on it.

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1 **A. Yes, so as part of, we would want to understand**
 2 **a person's, I suppose, criminal history and to look for**
 3 **criminal activities they had been involved in, if they**
 4 **had been convicted of those, or if they hadn't. We**
 5 **would also look potentially for identifying**
 6 **characteristics, so we had marks, scars, tattoos, things**
 7 **like that to confirm that a person was who we thought**
 8 **they were in a sort of general overview.**
 9 Q. Thirdly, can you tell us about access to the PNC system,
 10 did everyone have the same access?
 11 **A. In my unit or in --**
 12 Q. No, in the police force?
 13 **A. Oh, sorry. No, there is different levels of access.**
 14 **Our -- my access and that of my colleagues would have**
 15 **been what we would call read only access, so we wouldn't**
 16 **be allowed to amend the data. We would usually go on,**
 17 **I think at the time it was a five-day course, it might**
 18 **have been reduced now to maybe three or four, so it is**
 19 **a five-day course and they show you the different**
 20 **aspects of where to find the various information and**
 21 **what that means. Other people in the force would have**
 22 **the function to enter direct levels of the PNC, but that**
 23 **was not our department.**
 24 Q. Thank you.
 25 Then lastly on the PNC can you explain in summary

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1 the difference between a court print and a police print
 2 of the PNC in relation to an individual?
 3 **A. The police print would contain more information.**
 4 Q. What are the main differences?
 5 **A. I believe the arrest summary would be included within**
 6 **the police print, but not in the court print.**
 7 **The court print would focus predominantly on**
 8 **convictions and the sentences that were given with those**
 9 **convictions.**
 10 **The police print would contain, as I said, arrest**
 11 **and you could also I think select to have things like**
 12 **the identifiable characteristics, occupations,**
 13 **et cetera, so it was more bespoke.**
 14 Q. Secondly, the PND, the police national database, can you
 15 describe that system for us please?
 16 **A. Yes, sir. Please forgive me, I am not as familiar with**
 17 **the police national database.**
 18 Q. No, I don't think you had access rights, did you?
 19 **A. No, I don't. I have never used it. As I understand it,**
 20 **it is again a national police national system that is**
 21 **available to all law enforcement authorities and it --**
 22 **it also does not just take convictions, it allows**
 23 **intelligence to be shared between other forces. When**
 24 **I say shared, it gives you an indication that**
 25 **a particular force holds information on a person and you**

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1 **would then apply to that force with the reference number**
2 **for that information, if it could be accepted.**
3 Q. Did anyone in your section have access to the PND?
4 **A. Yes, they will have had.**
5 **You are going to ask me who now, aren't you, sir?**
6 Q. Not necessarily. Out of Mr Lapniewski or Ms Griffiths?
7 **A. Simon has access to the PND.**
8 THE CHAIRMAN: Sorry?
9 **A. Sorry, Simon Lapniewski, DC Lapniewski, has access to**
10 **the PND. I honestly cannot remember if Rachel does or**
11 **does not, sir.**
12 THE CHAIRMAN: When you say does, do you mean now or at the
13 time.
14 **A. No, I think Simon had it at the time, sir.**
15 MR BEER: You cannot remember whether Rachel did or did not?
16 **A. I am afraid not.**
17 Q. Okay.
18 OPUS, can you describe please what OPUS is, again in
19 high level detail?
20 **A. Okay. It is --**
21 Q. In fact I mean high level summary, not high level
22 detail.
23 **A. It is an interface, a front end system that draws**
24 **information and data from several other GMP IT systems.**
25 Q. Yes.

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1 **A. So we will have -- we have command and control system,**
2 **we have crime management system, we have missing**
3 **persons, we have public protection, what OPUS allows is**
4 **you to be able to enter the information into the system,**
5 **in theory once, and you will get back any information**
6 **that contains that from the several systems, it also**
7 **includes the force intelligence system --**
8 Q. It is like a gateway into a number of other storage
9 facilities, that each contain information?
10 **A. Yes, sir.**
11 Q. What was the system used for, please?
12 **A. It was used as incidents, so members of the public**
13 **contacting the police about day-to-day incidents --**
14 Q. Yes.
15 **A. -- crimes, people who had gone missing, missing from**
16 **homes, you were able to put information onto**
17 **individual's pages, so if they were, for example,**
18 **missing from home, it would have a marker on it to show**
19 **that they were missing, you could put warning markers on**
20 **there, you could put to show if they were wanted for**
21 **a criminal offence, if they were wanted for, say,**
22 **failing to appear at court, court warrants et cetera,**
23 **and then you could link individuals to properties, or to**
24 **business addresses.**
25 Q. Right.

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1 **A. Vehicles, mobile telephones. Things --**
2 Q. Thank you. In your section did everyone have access to
3 the system?
4 **A. They did, sir, yes.**
5 Q. Can you tell us next, please, again in high level
6 summary, what COPU was, firstly what did it stand for?
7 **A. Central operational policing unit.**
8 Q. Central operational policing unit?
9 **A. I believe so.**
10 Q. Thank you.
11 **A. That was quite an old system. It is not used anymore;**
12 **it has been replaced by the force intelligence system.**
13 **At the time, it was used to disseminate intelligence**
14 **across the force to different departments and different**
15 **areas, command units, divisions. It was based on the**
16 **Lotus Notes application.**
17 THE CHAIRMAN: On what, sorry?
18 **A. The Lotus Notes application, sir. It would allow**
19 **Greater Manchester Police to share intelligence with in**
20 **force and also out of force.**
21 MR BEER: Was it still active at the end of 2011 and the
22 beginning of 2012?
23 **A. Yes and no, sir. Sorry, yes, we could still access it**
24 **to get historic information --**
25 Q. Yes.

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1 **A. -- but we were not putting anything new on there.**
2 Q. That was going on to FIS?
3 **A. Yes, sir.**
4 Q. Did all of your staff in your section have access to
5 COPU?
6 **A. Yes, they would have done.**
7 Q. Can you tell us what Experian is, please?
8 **A. Experian is a financial credit check facility that**
9 **anybody can get access to. It allows you to look at**
10 **an individual's credit file in relation to loans,**
11 **overdrafts, mortgages, information like that. Anything**
12 **that has, I suppose, a financial or a credit check.**
13 Q. What was it used for in your section?
14 **A. It would be used to, usually to identify a current**
15 **address --**
16 Q. Yes.
17 **A. -- for a person.**
18 Q. If they have used that address when making
19 an application for a loan or a bank account?
20 **A. Yes.**
21 Q. Or credit?
22 **A. Yes.**
23 Q. Thank you.
24 Did all of your members have access to Experian?
25 **A. I couldn't be 100 per cent sure about that, sir.**

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1 **I would suspect that the majority would have but**
 2 **I couldn't guarantee all of them did. I am sure Simon**
 3 **and Rachel did.**
 4 Q. Thank you.
 5 The FIS, the force intelligence system, when was
 6 that introduced, please?
 7 **A. I am not sure now, sir. (Pause)**
 8 **I am just trying to think --**
 9 Q. Don't worry if you cannot remember.
 10 **A. Probably towards the end, around about late 2000s, so**
 11 **2008/2009 possibly.**
 12 Q. 2008/2009?
 13 **A. I would guess.**
 14 Q. Can you describe in high level summary what the force
 15 intelligence system was?
 16 **A. Well is, it is still active, sir. It is a way of --**
 17 **an upgraded IT version of the COPU system, so we can**
 18 **create intelligence, intelligence that comes into**
 19 **Greater Manchester Police from other forces, other**
 20 **areas, can go on to there, likewise we can record our**
 21 **own intelligence. It allows for a greater deal of**
 22 **control over who has access to it. It would record the**
 23 **provenance of that information, where it came from, and**
 24 **further contact details. What it allows you to do is to**
 25 **hide that information behind, so that only a select**

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1 **number of people see that.**
 2 Q. Okay.
 3 **A. And then it allows you to create the information, or the**
 4 **intelligence, rate it appropriately, link it to any**
 5 **person, location, telephone number, things like that.**
 6 **If the intelligence requires a risk assessment, it**
 7 **allows you to put on a risk assessment to that, so if it**
 8 **was sensitive information that could only be shared with**
 9 **certain people, and then allow for that information,**
 10 **that intelligence, to be created and managed, so there**
 11 **is like a tasking element to it, so you could task that**
 12 **information to people and it would audit trail who had**
 13 **had that intelligence and who could see it.**
 14 Q. Thank you.
 15 Can I turn then to the 5x5x5 system. In summary,
 16 would I be right to say that the 5x5x5 system is
 17 an evaluation process introduced under the national
 18 intelligence model?
 19 **A. That's correct, sir.**
 20 Q. It was introduced to replace what might have been
 21 described as the old rule of thumb evaluation process?
 22 **A. Yes, sir.**
 23 Q. Is that right?
 24 **A. Yes, sir.**
 25 Q. I am not going to go through the 213-page "National

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1 Intelligence Model Guidance" published by ACPO in 2005
 2 by the National Centre for Policing Excellence, or the
 3 200-page "Management of Police Intelligence Guidelines"
 4 published on behalf of ACPO by the National Police
 5 Improvement Agency in 2008, but can I try and
 6 crystallise what are said to be the benefits of the
 7 5x5x5 system as follows.
 8 If you agree or disagree or want to add, please do.
 9 **A. Okay, sir.**
 10 Q. Firstly, are the benefits of the system supposed to be
 11 having a formalised system that makes the identification
 12 of credible intelligence easier?
 13 **A. Yes, sir.**
 14 Q. Secondly, it means that the -- or is supposed to mean
 15 that the intelligence is assessed in a consistent way?
 16 **A. Yes, sir.**
 17 Q. Thirdly, it facilitates the sharing of information
 18 between officers?
 19 **A. Yes, sir.**
 20 Q. Fourthly, it provides or is supposed to provide,
 21 operational officers with a stronger basis, a more
 22 confident basis for taking action?
 23 **A. Yes, sir.**
 24 Q. Lastly, it makes the storage and dissemination of
 25 intelligence auditable?

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1 **A. Yes, sir.**
 2 Q. Thank you.
 3 Are there any additional benefits? I have tried to
 4 bring those 403 pages down to those propositions, is
 5 that --
 6 **A. I would say that is it.**
 7 Q. In terms of the three lots of 5s, the first 5 relates to
 8 the source of the intelligence?
 9 **A. That's correct, sir.**
 10 Q. Yes? Am I right that that is rated as (a) always
 11 reliable, (b) mostly reliable, (c) sometimes reliable,
 12 (d) unreliable or (e) untested source?
 13 **A. Yes, sir.**
 14 Q. That range can take into account a spectrum of issues,
 15 including, for example, whether the source may himself
 16 be unreliable or the other source of intelligence if it
 17 if not a person be unreliable, for example if they bear
 18 a grudge or have a history of not being accurate or that
 19 kind of thing?
 20 **A. Yes, sir.**
 21 Q. The second 5, does that relate to the intelligence
 22 itself?
 23 **A. It does, sir.**
 24 Q. Is it right that that ranges from (1) -- this is
 25 numerals, so digits -- known to be true without

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1 reservation?
 2 **A. Yes, sir.**
 3 Q. (2) known personally to the source but not the person
 4 reporting?
 5 **A. Yes, sir.**
 6 Q. (3) not known personally to the source but corroborated?
 7 **A. Correct, yes.**
 8 Q. (4) cannot be judged?
 9 **A. Yes, sir.**
 10 Q. And (5) suspected to be false?
 11 **A. Yes, sir.**
 12 Q. Thank you.
 13 That would allow you to bring into account things
 14 like whether information was fourth hand hearsay or not?
 15 **A. Correct.**
 16 Q. Whether it was an overheard conversation in a bar?
 17 **A. Yes, sir.**
 18 Q. Then the third 5 relates to the handling conditions to
 19 be imposed on the intelligence?
 20 **A. That's correct, sir.**
 21 Q. I am not going to run through those categories because
 22 they are less relevant here.
 23 You say in your witness statement, if we can turn
 24 that up, please at page 3 of the bundle, this is E/369
 25 for those following, at the foot of the page, five lines

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1 up:
 2 "In my experience of presenting intelligence to
 3 tactical firearms commanders they will take
 4 consideration of all available intelligence and
 5 information regardless of grading."
 6 Then:
 7 "They will always ask what the grading is to assist
 8 in their decision making."
 9 Do you see that?
 10 **A. Yes, sir.**
 11 Q. What is your experience of providing information for the
 12 purposes of firearms operations, and its use by firearms
 13 commanders?
 14 **A. Limited, not as many as other officers, however, on the**
 15 **two occasions I have provided information to a tactical**
 16 **firearms commander they have wanted to know all the**
 17 **information that is available and that appropriate**
 18 **rating for that information.**
 19 Q. The appropriate rating, you are referring back to the
 20 5x5x5?
 21 **A. Yes, sir.**
 22 Q. In what context were they asking you the question?
 23 **A. It was more they didn't want -- they would not want to**
 24 **focus on a particular or intelligence rated by**
 25 **a particular way, so for example something that was B21,**

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1 **which would suggest that that is a very good source.**
 2 Q. Yes?
 3 **A. Because likewise, what could happen is you could have**
 4 **intelligence that was rated, say, E4, so it is**
 5 **an untested source and we cannot evaluate it. That**
 6 **intelligence would retain that rating. However, we may**
 7 **have corroborated that intelligence in another way, so**
 8 **as an example --**
 9 Q. Just before you go on with that, I was asking you in
 10 what context were they asking you the question? Were
 11 you on the phone to them or were you in a briefing or?
 12 **A. Sorry, I apologise.**
 13 Q. That is all right.
 14 **A. In a briefing.**
 15 Q. Right. Was this on a firearms deployment?
 16 **A. It was for the firearms cadre prior to the decision**
 17 **whether firearms would be utilised or not.**
 18 Q. It was a pre-deployment briefing? Okay.
 19 Without divulging what the operation was, because
 20 that is of no interest, or operations were, that is of
 21 no interest to us, what were they asking the question
 22 about, or questions about?
 23 **A. It was around the individuals who -- and the address.**
 24 **So I think it was a request for, or a request to**
 25 **consider firearms officers to conduct an arrest of**

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1 **a person.**
 2 Q. Yes.
 3 **A. They wanted to know the risk that that person could**
 4 **potentially pose and details about where that individual**
 5 **would be located and if there was any risk associated to**
 6 **that.**
 7 Q. Was this the silver that was asking, the tactical
 8 firearms commander?
 9 **A. Yes.**
 10 Q. He or she was asking targeted questions about
 11 information that was provided in order to apply the
 12 police service wide rating system to it?
 13 **A. Yes, sir.**
 14 Q. Thank you.
 15 Can we look, please at the subject profile that was
 16 created for Operation Samana in this case, it is page 12
 17 of the bundle -- it has not come up that clearly at the
 18 top.
 19 Can you see it?
 20 **A. Yes, sir.**
 21 Q. This was created by PC Rachel Griffiths. I just want to
 22 look within it, please, if you look at page 21, and on
 23 to 22, there are quite a few redactions there but they
 24 don't matter for the moment. Can you see here that
 25 there was a rating column?

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<p>1 A. Yes, sir. 2 Q. Without revealing what they were, I can say that they 3 were the 5x5x5 ratings? 4 A. Yes, sir. 5 Q. If a firearms commander or an investigating officer was 6 looking at these two pages, they would be able to see 7 what the NIM, the NIM ratings were? 8 A. Yes, sir. 9 Q. But this information is, I think we can see is 10 relatively innocuous, it is about I think Colin Waters 11 and three sightings of him. 12 I wanted to ask you about other parts of this 13 profile. 14 A. Yes, sir. 15 Q. Can you look at page 14, please, which is the risk 16 assessment part of it. 17 A. Okay, sir. 18 Q. Can you see, under "Subject information", "Risk 19 assessment?" 20 A. Yes, sir. 21 Q. "Grainger was born in Salford and is very well known 22 with the Salford criminal element, particularly the cash 23 in transit and armed robbery fraternity. He has very 24 strong links to ..." 25 A. Yes, sir.</p> <p style="text-align: center;">Page 165</p>	<p>1 work out how strong your confidence in that suggestion 2 might be? 3 A. Yes, sir. 4 Q. If it just appeared like that, as it did without that 5 kind of qualification in it, would you expect 6 an investigating officer or a firearms commander to make 7 the kind of enquiries that you have suggested were made 8 to you in the past? 9 A. Yes, sir. 10 Q. If you look at this subject profile, and I wonder 11 whether you could also be shown the bundle for 12 Mr Lapniewski. 13 Sir, do you have your bundle easily to hand? 14 THE CHAIRMAN: Yes, I have. 15 MR BEER: Thank you. 16 If we could start with Mr Lapniewski's bundle and 17 look at the subject profile that he prepared for 18 David Totton, this is F/33 for people that are 19 following, it is page 9 of the bundle. Thank you. Can 20 you see that it has an index at page 10? 21 A. Yes, sir. 22 Q. Then it is followed by 11 sections that relate to the 23 index? 24 A. Yes, sir. 25 Q. It is I think 13-odd pages long; it finishes at page 21.</p> <p style="text-align: center;">Page 167</p>
<p>1 Q. Just stopping there, that is not rated in any way, is 2 it? 3 A. That particular -- no, sir. 4 Q. Would you expect that kind of section of this kind of 5 document to be rated in some way? 6 A. I would expect the precis, summary, to reflect the 7 operation that that officer has uncovered. So if there 8 is information -- take this sentence here, sir, if that 9 was we had intelligence about him, "The Salford criminal 10 element, particularly the cash in transit and armed 11 robbery fraternity", where that is in the intelligence. 12 Q. You would expect that intelligence to appear somewhere 13 else within the profile -- 14 A. Yes. 15 Q. -- and itself carry a rating? 16 A. Yes, sir. 17 Q. Rather than just summarising in this way? 18 A. Yes, sir. Yes, sir, definitely. And I have on some 19 occasions seen within the sentence, the reference number 20 that that intelligence relates to, or intelligence logs 21 relate to. 22 Q. I see, so it would include the reference to where you 23 find it? 24 A. Yes, sir. 25 Q. So that you can apply some logic and analysis to it to</p> <p style="text-align: center;">Page 166</p>	<p>1 A. Yes. 2 Q. Then similarly in the same format in this same folder, 3 page 180 -- I am so sorry, page 204. 4 A. Sorry, sir. 5 Q. That is all right. 6 A. Yes. 7 Q. 204 we can see nominal profile created for Robert Rimmer 8 by DC Karen James. If you just flick over the page you 9 will see that it is in a similar format. 10 A. Yes, sir. 11 Q. Then on to page 248, the nominal profile for 12 Jamie Corkovic, created by DC Lapniewski. 13 A. Yes, sir. 14 Q. Same format. 15 Then page 262, for Paul Corkovic created by 16 DC Lapniewski, same format? 17 A. Yes, sir. 18 Q. So those, between DC James and DC Lapniewski, are all in 19 a common regularised format, do you see? 20 A. Yes, sir. 21 Q. If we can then turn to the PC Griffiths one in your file 22 at page 12, can you see it is in a different format? 23 A. Yes, sir. 24 Q. It is not just it is called a pen picture, I am not 25 concerned about that for the moment, but it is in</p> <p style="text-align: center;">Page 168</p>

1 a completely different format, isn't it?
 2 **A. It is yes, sir.**
 3 Q. If you just flick through that, can you see whether --
 4 and I appreciate there are parts of it that are quite
 5 heavily redacted, can you see in it whether this was
 6 a previous version of a template that the section used
 7 or whether this is a different type of profile?
 8 **A. I would suggest it is a different type of profile. The**
 9 **elements of the profile seem to be there, it is just not**
 10 **as clearly structured as maybe the other ones are.**
 11 Q. In terms of the purpose for which it was prepared, does
 12 this look like a different type of profile, as compared
 13 to the others?
 14 **A. For the purpose it --**
 15 Q. The purpose it was prepared?
 16 **A. Sorry, sir, I don't understand.**
 17 Q. We have heard evidence this morning from PC Griffiths to
 18 say that the ones we have just looked at in
 19 DC Lapniewski's file, the four of them in there, they
 20 were subject profiles proper, they were about a person,
 21 an individual?
 22 **A. Right, sir, yes.**
 23 Q. Whereas this profile, although it says it is a pen
 24 picture relating to Anthony Grainger, it wasn't, it was
 25 a profile about Mr Grainger and Mr Waters, Colin Waters,

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1 and was just prepared for an operation?
 2 **A. Right, sir.**
 3 **If you are asked -- in my opinion, if you are asked**
 4 **to provide an assessment on an individual, there is key**
 5 **criteria that should be included within that assessment**
 6 **because I -- you don't know at what point that**
 7 **information is going to be used within the course of the**
 8 **investigation.**
 9 Q. Yes.
 10 **A. So there is no point just putting a few lines together**
 11 **for something that then could potentially get used**
 12 **further on down the line. So if you are asked to**
 13 **provide a subject profile of a person, you should**
 14 **include all the elements of that profile. In my**
 15 **opinion, sir.**
 16 Q. Thank you.
 17 I think it is right, isn't it, that there was not
 18 any formal training for operatives on the section on how
 19 to create subject profiles, it was a learning on the job
 20 process?
 21 **A. Yes.**
 22 Q. Okay, and there was not any written guidance or policy
 23 on how to create a subject profile?
 24 **A. No, there wasn't.**
 25 Q. Was there any quality assurance or were any measures

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1 taken within the FIB to monitor the accuracy,
 2 consistency and quality of subject profiles?
 3 **A. That would have been down to line managers within the**
 4 **department to ensure that we ideally kept the same**
 5 **consistency and the same templates. It didn't always**
 6 **work that way. There was some --**
 7 Q. You were I think the line manager for DC Lapniewski and
 8 PC Griffiths. At this time in late 2011/early 2012,
 9 what steps did you take to quality assure or monitor the
 10 accuracy and completeness of the subject profiles that
 11 were being prepared?
 12 **A. I would dip sample, and as you can see further in the**
 13 **bundle there is consistency with regards to the**
 14 **information.**
 15 **This profile was prepared by the officer when she**
 16 **was detached from my section; she had been seconded to**
 17 **another investigation.**
 18 Q. Oh, I see.
 19 **A. Which is when she prepared this.**
 20 Q. Which investigation had she been --
 21 **A. Samana.**
 22 Q. I see, so she was not physically sitting in your
 23 building?
 24 **A. As I understood it, no, she went -- I didn't know what**
 25 **the investigation was about initially because of the --**

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1 Q. It was a bit hush-hush?
 2 **A. Yes, sir, as you can possibly understand why.**
 3 Q. Just so everybody knows, it was about the loss of a --
 4 **A. They do now, sir, but at the time, that day it was kept**
 5 **very quiet and they worked from a separate building and**
 6 **I was just told that Rachel had gone on Operation Samana**
 7 **and that I didn't need to, at that point, need to know**
 8 **what it was about.**
 9 Q. I see.
 10 Might that explain why her profile is in
 11 an irregular format?
 12 **A. Yes, sir.**
 13 Q. Okay. Did you have the opportunity to see it before it
 14 went out?
 15 **A. When it was first --**
 16 Q. Yes.
 17 **A. When -- no, sir. The first time I saw the profile**
 18 **was --**
 19 Q. In February 2012 I think, we are going to come on to
 20 that, probably tomorrow morning.
 21 **A. Sorry.**
 22 Q. When it first went out for the purposes of Samana, you
 23 didn't see it?
 24 **A. No, sir.**
 25 Q. How long was she abstracted from your department?

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1 **A. I would be guessing, it was not a considerable – it was**
 2 **a few weeks. Maybe months but not a long, long period**
 3 **of time.**
 4 Q. Whilst looking at the profiles that were consistent in
 5 DC Lapniewski's bundle, please, if we look at the one
 6 relating to Mr Totton --
 7 **A. Sorry, sir, could you remind me?**
 8 Q. Page 9, please.
 9 **A. Page 9, thank you.**
 10 Q. F/33.
 11 Is the front sheet of the nominal profile a standard
 12 form template available on a drive within your section?
 13 **A. Yes, sir.**
 14 Q. Although you might have to populate who the originator
 15 was, the date that the thing was produced, which version
 16 it was and the circulation list, did the other
 17 information on there remain constant?
 18 **A. Yes, sir.**
 19 Q. You see in box 1 it says:
 20 "Any further dissemination of this profile is not
 21 permitted without permission from the DIs in possession,
 22 a copy of the profile contains sensitive intelligence
 23 which needs sanitising in the first instance."
 24 **A. Yes, sir.**
 25 Q. That would suggest that the gatekeeper for dissemination

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1 was the detective inspector of the unit to which the
 2 profile had been dispatched?
 3 **A. Yes, sir.**
 4 Q. If you look at box 2, it says:
 5 "This intelligence document has been compiled for
 6 the purpose of dissemination to the robbery unit,
 7 DS Hurst. Under no account should this document be
 8 disseminated without prior authorisation of the
 9 management at the GMP Force Intelligence Bureau."
 10 Which tends to suggest that the gatekeeper for
 11 further dissemination is the management within the FIB?
 12 **A. Yes, sir.**
 13 Q. You can see that they are contradictory?
 14 **A. Yes, sir.**
 15 Q. Which box carried the day?
 16 **A. It would tend to be the DIs who had possession of the**
 17 **profile, they requested it, they would sometimes want to**
 18 **know certain information. So it would be handed to**
 19 **them, they would be responsible for that document and**
 20 **its onwards dissemination.**
 21 **I think what – and it is confusing, sir, but what**
 22 **we didn't want was that document being sent to other**
 23 **agencies or other law enforcement departments and**
 24 **agencies so that was Department of Work and Pensions or**
 25 **Her Majesty's Revenue and Customs, but the DI would be**

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1 **able to disseminate that to maybe the officer in the**
 2 **case and their deputy within the investigation.**
 3 Q. You see it doesn't qualify it in that way --
 4 **A. It doesn't.**
 5 Q. -- it doesn't talk about dissemination outside GMP?
 6 **A. No, it doesn't, sorry.**
 7 Q. Both boxes are concerned amongst other things with
 8 dissemination within GMP.
 9 **A. Yes, sir, it is confusing.**
 10 Q. Because if the first box carries the day, it means that
 11 you lose the opportunity within the FIB to say to
 12 operational officers, "Hold on, you are using this
 13 profile for a purpose for which it was not intended".
 14 **A. Yes.**
 15 Q. Did any officers to whom profiles were disseminated ever
 16 come back to you and say, "We want to use it for this
 17 purpose within the organisation, can we?"
 18 **A. Not that I can recall, sir, no.**
 19 Q. It would seem understood as well that the first box
 20 carried the day?
 21 **A. Yes.**
 22 Q. Once they had it, that they could do as they wished with
 23 it within the organisation?
 24 **A. Yes, sir.**
 25 Q. Was there any guidance or policy to intelligence

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1 officers working in your section as to the approach that
 2 they should take to the inclusion of warning markers in
 3 a subject profile?
 4 **A. No, there was no written policy, sir. But it was**
 5 **ensured that if as you can see through the latter**
 6 **profiles, if they were going to include a warning**
 7 **marker, they had to show where that information was**
 8 **from. So if it was from a crime or it was from**
 9 **a conviction or if there was -- I don't mean a single**
 10 **piece of intelligence, there would have to be multiple**
 11 **intelligence logs to support, potentially the inclusion**
 12 **of a warning marker.**
 13 Q. I think if we hold that thought, if it is convenient to
 14 the chairman, overnight, remembering it for tomorrow
 15 morning, that you were saying that if a warning marker
 16 is included, they needed to show what the justification
 17 for it was?
 18 **A. Yes.**
 19 MR BEER: Thank you very much.
 20 Sir, is that a convenient moment.
 21 THE CHAIRMAN: Yes, it is a convenient moment. Is 10.30
 22 going to be adequate tomorrow? We don't need to start
 23 any earlier?
 24 MR BEER: No, that is completely adequate, sir. Thank you.
 25 THE CHAIRMAN: Fine.

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<p>1 (4.29 pm) 2 (The Inquiry adjourned until 10.30 am the following day) 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 177</p>	
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