

<p>1 Friday, 17 February 2017 2 (9.45 am) 3 (Proceedings resumed in closed session) 4 (2.30 pm) 5 (Proceedings in open session) 6 Housekeeping 7 THE CHAIRMAN: Yes. 8 MR BEER: Sir, thank you. We are back in open session now, 9 with all the core participants present. 10 Just to explain what is proposed to happen now. 11 Mr Cousen gave some evidence in closed session which 12 should really be in open; that has therefore been taken 13 from the closed session transcript, lifted and is being 14 printed, now, by Ms Cartwright. 15 THE CHAIRMAN: Yes. 16 MR BEER: It is proposed to give that to the core 17 participants, in order that they can see it and ask any 18 questions that they wish of Mr Cousen. 19 Secondly, we have distributed an email, which 20 I think you have, dated 17 February, ie today. 21 THE CHAIRMAN: Yes. 22 MR BEER: At 9.13 this morning, from GMP, for solicitor, 23 Ms Pope, to Ms Cartwright and myself, concerning 24 an audit inquiry, or transaction inquiry, that we had 25 asked to be carried out on Mr Cousen's access to the</p> <p style="text-align: center;">Page 1</p>	<p>1 does not start on Tuesday. We carry on with our 2 timetable, and then fit DS Hurst's evidence in a little 3 later in the Inquiry. 4 THE CHAIRMAN: Yes, well, I approve of that course. 5 MR BEER: I don't think we are asking you to do anything, at 6 the moment. It is just to be courteous and keep you 7 updated. 8 THE CHAIRMAN: I will rise, and I will wait until everybody 9 has had the opportunity they need to look at the matters 10 you have referred to. 11 (2.37 pm) 12 (A short adjournment) 13 (3.15 pm) 14 MR ROBERT COUSEN (continued) 15 Further questions from MR BEER 16 MR BEER: Mr Cousen, just three things, please, from me, two 17 of them from evidence you gave in closed session. 18 Firstly, can you look at page F/423. I will hand 19 a copy up, it is probably easier if we just look at the 20 page. I think everyone has a copy now. 21 A. Yes. 22 Q. Do you see, we have looked at this document a number of 23 times before? 24 A. Yes. 25 Q. It is part of Mr Granby's briefing document --</p> <p style="text-align: center;">Page 3</p>
<p>1 GMPics system to identify whether he had accessed -- as 2 he had told us he did -- a crime report ending in 85B of 3 95. That email has been distributed. 4 THE CHAIRMAN: Yes. 5 MR BEER: Also distributed is a page, at F/423, which is 6 an opened up line of Mr Granby's log, so that the whole 7 sentence, at 12.45, at F423, reads: 8 "Review with ACC Sweeney. Subjects are running out 9 of potential targets." 10 THE CHAIRMAN: Yes. 11 MR BEER: It is therefore proposed that when the third piece 12 of material, the transcript, is delivered, the core 13 participants should have a little time to digest those, 14 digest the material, the other two pieces of material, 15 and then ask Mr Cousen any questions that they wish to 16 arising from that. 17 THE CHAIRMAN: Yes. The passage of evidence was not very 18 lengthy and, therefore, this can easily be accomplished, 19 all of it, this afternoon. 20 MR BEER: It can, sir. To get on to the open transcript, as 21 well. 22 In light these development, and another issue, which 23 means that it is inappropriate for Ms Hurst to begin her 24 evidence and go part heard, we are proposing that 25 DS Hurst does not give evidence this afternoon; that she</p> <p style="text-align: center;">Page 2</p>	<p>1 A. Yes. 2 Q. -- for 3 March 2012. 3 A. Yes. 4 Q. Do you see the entry at 10.45? 5 A. Yes. 6 Q. "Review with ACC Sweeney. No new intelligence. Discuss 7 with SIO likely targets and risk periods. Cash in 8 transit deliveries predominantly 11.00 till 1.00. 9 Banks, building societies and Post Offices all closed by 10 12.30. Agree to review again at 13.00." 11 A. Yes, sir. 12 Q. That discussion was with you, at about 10.45, about the 13 times that the cash in transit deliveries ended and when 14 the banks, building societies and Post Offices in 15 Culcheth closed. 16 A. Yes, sir. 17 Q. Then, if we look, it looks like the review took place 18 15 minutes or so earlier than was anticipated, because 19 at 12.45, at the bottom of the page, rather than the 20 1.00 that had been planned, Mr Granby has written: 21 "Review with ACC Sweeney." 22 Then, "Subjects". Then a line that has been opened 23 up is: 24 "Subjects are running out of potential targets." 25 Can you see that?</p> <p style="text-align: center;">Page 4</p>

1 **A. I can, yes.**
 2 Q. Were you part of this review?
 3 **A. Not that I am aware of. I may have been, but not that**
 4 **I recall.**
 5 Q. Do you remember discussing, if not with ACC Sweeney but
 6 with Mr Granby, the fact that by about 1.00 the subjects
 7 were running out of potential targets?
 8 **A. I don't remember discussing that at all, no.**
 9 Q. Would you agree that, by 1.00, the subjects were running
 10 out of potential targets?
 11 **A. No. On the day, the intelligence was unknown in terms**
 12 **of targets or locations.**
 13 Q. Do you disagree then that, by 1.00, the subjects were
 14 running out of potential targets.
 15 **A. Yes, what I would say is there was other places within**
 16 **the Culcheth area that could be potential robbery**
 17 **locations.**
 18 Q. Do you disagree with the assessment that seems to have
 19 been made, at least by Mr Granby, at 12.45, that by that
 20 time the subjects were running out of potential targets?
 21 **A. Yes, I mean, I don't know what he was talking about.**
 22 **I mean, those are his words there and I am sure he will**
 23 **answer in due course but, from my perspective, unless he**
 24 **is referring to the fact that the banks, building**
 25 **societies, et cetera, are all closing, and that is what**

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1 **he is actually referring to.**
 2 Q. Would there be a reason that you wouldn't participate in
 3 a discussion with Mr Granby, by about lunchtime, that,
 4 "Look, we thought that they may be going for a cash in
 5 transit delivery or a financial institution. The cash
 6 in transit deliveries have all passed without incident
 7 now."
 8 **A. Yes.**
 9 Q. "The financial institutions are all closed by 12.30.
 10 They are running out of potential targets, aren't they?"
 11 **A. I don't remember being party to that conversation.**
 12 **Mr Granby was at the opposite end of building to me. He**
 13 **was in the firearms unit and I was in the surveillance**
 14 **unit. I don't know if he was at that particular time**
 15 **but --**
 16 THE CHAIRMAN: I think the question was whether there was
 17 any reason why you would not be included in such
 18 a discussion?
 19 **A. There shouldn't be any reason why I wouldn't be, but**
 20 **I think Mr Granby was more than aware, as would**
 21 **Mr Sweeney, I assume, albeit I don't remember this**
 22 **conversation, but there were other places within the**
 23 **Culcheth area that had substantial amounts of cash,**
 24 **access to substantial amounts of cash.**
 25 MR BEER: If this was a consensus reached between Mr Granby

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1 and Mr Sweeney, at about 12.45, that the subjects were
 2 running out of potential targets, would that be
 3 a consensus you disagreed with?
 4 **A. It would be a consensus I disagreed with.**
 5 Q. Were you party to the discussion which led to that
 6 consensus being reached, if that is the evidence we are
 7 going to hear?
 8 **A. I don't remember being party to that conversation.**
 9 Q. It would be important for you to be a party to such
 10 a discussion, wouldn't it?
 11 **A. Well, I wasn't invited to the review meeting. The**
 12 **review was with ACC Sweeney and Superintendent Granby,**
 13 **that was the strategic firearms commander with**
 14 **the tactical firearms commander.**
 15 Q. But you are the SIO in possession of a wider range of
 16 intelligence and information than either Mr Granby or
 17 Mr Sweeney, aren't you?
 18 **A. Potentially, yes. Like I said, my assessment was that**
 19 **there was quite a number of other locations there that**
 20 **could potentially be the target of a robbery.**
 21 Q. Isn't the truth of the matter that that also represents
 22 your view that, by about lunchtime, you took the view
 23 also that the subjects were running out of potential
 24 targets --
 25 **A. No, it is not.**

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1 Q. -- but you carried on with the operation to see what, if
 2 anything, happened?
 3 **A. No, it is not, sir.**
 4 Q. That you didn't have any belief that the subjects would
 5 target premises and actively carry out a robbery after
 6 about lunchtime on Saturday, the 3rd?
 7 **A. No, it is not, sir.**
 8 Q. Can I move then to the second topic, please.
 9 You, I think, have given evidence that the forensic
 10 arrest strategy was an important part of your
 11 preparations for an armed deployment.
 12 **A. It is not for an armed deployment, it is any arrest**
 13 **situation.**
 14 Q. Any arrest, okay.
 15 **A. Yes.**
 16 Q. We have seen that you were provided with a bespoke
 17 emailed forensic arrest strategy.
 18 **A. That's correct.**
 19 Q. Which, as I think we discussed, set out a carefully
 20 sequenced series of events relating to people, to
 21 objects and to cars, in particular?
 22 **A. Yes.**
 23 Q. You would want to know, wouldn't you, in developing that
 24 forensic arrest strategy if the firearms team intended
 25 to break a window of the car, the subject car, and throw

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1 a CS grenade into it, wouldn't you?
 2 **A. The tactics of the firearms team would override whatever**
 3 **my forensic requirements may be.**
 4 Q. That might be so, that is to whether or not they adopt
 5 that tactic or not.
 6 **A. Yes.**
 7 Q. You presumably would not say to them, "Don't do that,
 8 I want to preserve evidence"?
 9 **A. Yes.**
 10 Q. But you would want to know that they were intending to
 11 do it, in order that it could be taken into account in
 12 your forensic strategy, wouldn't you?
 13 **A. No, the forensic strategy would be provided on the basis**
 14 **that people are arrested and then, whatever situation**
 15 **then founded, that would then be dealt with and, as far**
 16 **as possible, the forensic strategy would be adhered to,**
 17 **but that would be in consultation with the crime scene**
 18 **manager or the crime scene investigator.**
 19 Q. But wouldn't you want to know that it was planned as
 20 a working hypothesis that there would be a need to break
 21 the window of the car and throw a CS canister into it,
 22 which would potentially ruin or corrupt the crime scene?
 23 **A. I wouldn't -- like I said, I wouldn't need to know that.**
 24 **It is the -- the tactics the tactical firearms team**
 25 **deploy would override whatever my requirements were.**

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1 Q. That is a slightly different thing. It is whether you
 2 would need to know about it, in order that you could
 3 tell your crime scene manager, or the person that was
 4 developing the forensic strategy, "Look, you need to be
 5 aware that there is going to be potentially a chemical
 6 weapon used".
 7 **A. I wouldn't need to know about it. Once the area was**
 8 **sterile, secure, that is when the forensic strategy**
 9 **would then kick in, and further advice would then be**
 10 **sought from the crime scene manager.**
 11 Q. The third topic then, please.
 12 **A. Yes.**
 13 Q. It is about your access to GMPics.
 14 **A. Yes.**
 15 Q. I want to refer to three passages in the transcript.
 16 This is not the transcript of what you said just before
 17 lunch.
 18 **A. No.**
 19 Q. It is evidence that you gave earlier in the week.
 20 **A. Okay.**
 21 Q. I am going to try and read fairly what you have said
 22 already.
 23 **A. Yes.**
 24 Q. Firstly, Tuesday of this week, the 14th, starting at
 25 page 101, you said:

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1 "I think what it is fair to say is that, when I have
 2 looked at the pen picture ..."
 3 Pausing there, you are talking about
 4 Anthony Grainger's pen picture, available after
 5 7 February.
 6 **A. Yes.**
 7 Q. "... I have actually -- because it is an old crime --
 8 I think I mentioned to you earlier we have another
 9 system called GMPics ..."
 10 Then you went on to describe what GMPics was.
 11 **A. Yes.**
 12 Q. Then continuing, on line 9, you said:
 13 "So I have a printout if you want me to show you."
 14 I said, "Yes, I don't think it is something that we
 15 have seen before."
 16 **A. Yes.**
 17 Q. You then explained about GMPics. Line 17, you
 18 continued:
 19 "So, obviously, when I have received the pen
 20 picture, when I have actually looked at it, then I have
 21 looked on to the crime."
 22 I asked, line 20:
 23 "You are telling us that when you received
 24 Anthony Grainger's pen picture, you saw the reference to
 25 the Prestwich robbery and you followed it through?"

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1 And you said, "Yes".
 2 **A. Yes.**
 3 Q. You continued, the next page, at line 4:
 4 "I have read it on GMPics, yes, because it contained
 5 more information and, as I have alluded to --"
 6 And then I interrupted you, and you said:
 7 "As I have read it on the GMPics system, and the
 8 GMPics system in a nutshell is -- I would have to bring
 9 the printout in for you, but it explains there is
 10 a number of people who have been arrested, that there
 11 are going to be more arrests ..."
 12 And you started to explain about it.
 13 I asked you whether the printout was from 2012, when
 14 you printed it off, or was more recent, and you said you
 15 printed it off on Sunday of this week.
 16 **A. Yes.**
 17 Q. We then broke, for the day, and a redacted version of
 18 the document was provided. We came back on Wednesday.
 19 **A. Yes.**
 20 Q. Picking it up, at page 125, I asked the crime number in
 21 the subject profile, that you went off and looked at
 22 GMPics, and you said:
 23 "I would have done at some point, yes."
 24 I asked:
 25 "What do you mean 'would have done' -- you did it or

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<p>1 would it be your normal practice?"</p> <p>2 There were some other questions and answers, and</p> <p>3 I asked you again:</p> <p>4 "So when you said you would have done, are you</p> <p>5 saying you did it?"</p> <p>6 And you said:</p> <p>7 "No, I did. Yes."</p> <p>8 I asked:</p> <p>9 "You did?"</p> <p>10 And you said:</p> <p>11 "Yes."</p> <p>12 Thirdly, on page 133, I asked:</p> <p>13 "Can you remember when you did this? When you</p> <p>14 carried out this investigation work? Because we can see</p> <p>15 that the printout is dated 12 February this year, so</p> <p>16 Sunday of this week."</p> <p>17 And you answered:</p> <p>18 "Yes, this would have been done in between, some</p> <p>19 time after the 7th and before the 29th."</p> <p>20 You are talking about February 2012, there.</p> <p>21 A. Yes.</p> <p>22 Q. I asked:</p> <p>23 "Why before the 29th?"</p> <p>24 And you said:</p> <p>25 "Because that is the point where we go to the</p> <p style="text-align: center;">Page 13</p>	<p>1 Q. Your bundle 1.</p> <p>2 A. Yes.</p> <p>3 Q. Tab 3.</p> <p>4 A. Yes.</p> <p>5 Q. It is dated 10 January 2013?</p> <p>6 A. Yes.</p> <p>7 Q. Is that the statement you are referring to?</p> <p>8 A. It is, sir, yes.</p> <p>9 Q. That says that you effectively produce a number of crime</p> <p>10 reports.</p> <p>11 A. Yes.</p> <p>12 Q. The first amongst them is 23085B of 95, the one we are</p> <p>13 talking about.</p> <p>14 A. Yes.</p> <p>15 Q. This doesn't address the issue of GMPics, does it?</p> <p>16 A. No, it's I have printed off the crime reports. I don't</p> <p>17 know if it is GMPics or if it is using the OPUS system,</p> <p>18 but what it does address is the fact that I have been on</p> <p>19 to the crime system, whether it be OPUS or GMPics -- and</p> <p>20 I can't say which one it is -- I have been on there to</p> <p>21 review the crime.</p> <p>22 What it also told me was, at that time, is that when</p> <p>23 requests were coming in from the IPCC, the team that</p> <p>24 I was working with, we would discuss between us -- and</p> <p>25 my concern was that, actually, my memory was tainted by</p> <p style="text-align: center;">Page 15</p>
<p>1 firearms cadre."</p> <p>2 So the evidence you were giving earlier in the week</p> <p>3 was that you had accessed the GMPics system some time</p> <p>4 between 7 and 29 February 2012?</p> <p>5 A. Yes.</p> <p>6 Q. Is that correct?</p> <p>7 A. I don't now know, sir. I think you were aware, before</p> <p>8 lunchtime, I raised with the Chair that I had concerns</p> <p>9 in relation to what I presented in evidence as a result</p> <p>10 of a statement that I read last night, which told me</p> <p>11 that I had actually reviewed a number of crimes, 15 or</p> <p>12 16 crimes, on behalf of the IPCC in January 2013. That</p> <p>13 had caused me concern that actually there had been</p> <p>14 a later occasion when I had actually reviewed the</p> <p>15 crimes. On top of the fact that, in evidence yesterday,</p> <p>16 I was asked --</p> <p>17 Q. Just stop there and look at that one reason, first, if</p> <p>18 I can break it down.</p> <p>19 A. Yes.</p> <p>20 Q. So you were saying that last night you read a statement</p> <p>21 that you had provided to the IPCC?</p> <p>22 A. Yes.</p> <p>23 Q. If we could look at that and just work out which</p> <p>24 statement that was.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 14</p>	<p>1 kind of corporate knowledge rather than fact that I had</p> <p>2 actually carried out the act that I had actually told</p> <p>3 you, which is why I had raised the fact that I was</p> <p>4 concerned with the evidence that I had presented to the</p> <p>5 court. I didn't want to leave it be.</p> <p>6 Q. Are you saying that you were concerned that the evidence</p> <p>7 you had given about accessing GMPics between 7 and</p> <p>8 29 February was incorrect?</p> <p>9 A. It was potentially inaccurate.</p> <p>10 Q. Why did reading this statement lead you to believe that</p> <p>11 the evidence that you had given about accessing GMPics</p> <p>12 between 7 and 29 February 2012 was incorrect?</p> <p>13 A. Because I believed that the only time I had actually</p> <p>14 accessed the crimes was on the occasion when I had said.</p> <p>15 When I went on to the computer on Sunday, I had</p> <p>16 forgotten about the other occasion, on 10 January. So</p> <p>17 my recall at that point was that I recognised what was</p> <p>18 on the screen, on the OPUS screen, and I believed on the</p> <p>19 GMPics screen, from what I had seen in</p> <p>20 the February 2012, when in fact I couldn't be satisfied</p> <p>21 that it was not actually to do with the IPCC statement</p> <p>22 in January 2013.</p> <p>23 Q. Can I pick you up on three points in that. Firstly,</p> <p>24 this is printing off crime reports here, and the crime</p> <p>25 reports are -- the ones we have seen -- three, four or</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

1 five page documents, with very limited information in
 2 them, aren't they?
 3 **A. Yes.**
 4 Q. They are very different from the 20-odd page document
 5 that you produced on Sunday, the GMPics?
 6 **A. Yes, it is very much different, sir. Obviously, there**
 7 **is a lot more information on the GMPics document.**
 8 Q. Secondly, when I asked you earlier in the week whether
 9 you accessed GMPics or whether you would have done, you
 10 expressly said to me, "No, I did", didn't you?
 11 **A. Sir, I can't disagree with you. I think the first**
 12 **answer was, "I would have done". That should have**
 13 **caused me concern at that point, the fact that I have**
 14 **said, "I would have done", instead of saying, "Yes,**
 15 **I did do", straight away.**
 16 Q. The third thing is you said that you had done this
 17 because the box, or the text, in PC Griffiths' profile
 18 was in bold and in red and had a crime number in it.
 19 **A. Yes.**
 20 Q. It was the only crime number in it and it therefore
 21 allowed you to trace it back, and that you went through
 22 it and you were therefore satisfied with the accuracy of
 23 what she had written.
 24 **A. And, sir, in that regard, all I can say is that is what**
 25 **I would have done -- or that is what I would have**

1 **expected to have done.**
 2 Q. I understand at the moment, perhaps you can help me, why
 3 reading your statement of 10 January, last night, would
 4 have caused you to doubt the evidence that you had given
 5 on three separate parts of the transcript that you did
 6 access GMPics between 7 and 29 February?
 7 **A. Sorry, the point being there, sir, was that when I have**
 8 **gone on to the OPUS system, or the GMPics system --**
 9 **I can't remember -- on Sunday -- well, I went on to**
 10 **both, I have immediately recognised what is on the**
 11 **system. So the point being is, when I have recognised**
 12 **it on the system, I believe that I have recognised it as**
 13 **a result of what had been said -- sorry, what I had**
 14 **referred to going back to the February occasion.**
 15 **It caused me concern, because obviously I was then**
 16 **aware that, actually, I had looked up on the OPUS and**
 17 **possibly -- I don't know if I did look on the GMPics**
 18 **system. There was other aspects to that as well**
 19 **because -- I don't know if I can come to it in -- I was**
 20 **in questioning yesterday in relation to had I seen any**
 21 **of these crime reports previously, and I actually said**
 22 **I possibly had done. Well, clearly I had done**
 23 **because --**
 24 Q. That is a different issue. I am just focusing on
 25 accessing GMPics at the moment, if I can.

1 **A. Sorry. Yes.**
 2 Q. Are you aware that, as a result of the evidence that you
 3 gave on Tuesday of this week, the Inquiry asked GMP to
 4 conduct a transaction inquiry or an audit of whether you
 5 accessed GMPics between 1 of September 2011 and
 6 9 March 2012?
 7 **A. No, I wasn't aware. I was not aware that you could**
 8 **actually do that.**
 9 Q. Are you aware that that audit -- and it is a current
 10 report.
 11 **A. Yes.**
 12 Q. It may be there is further work to be done on this.
 13 **A. Yes.**
 14 Q. The current information provided by GMP is that the
 15 crime report on GMP, ending in 85B95, was not accessed
 16 by you between 21 September 2011 and 9 March 2012?
 17 **A. Well, I was not aware of that but, obviously, you are**
 18 **telling me that now.**
 19 Q. The only time you accessed it, according to the audit
 20 returns, was on Sunday last week.
 21 **A. Okay, sir, if that is what you are saying to me.**
 22 **But I was not actually aware that you could audit**
 23 **GMPics.**
 24 Q. Are you not aware that most police systems, as well as
 25 being able to provide information to officers, also

1 allow data to be accessed that shows who accessed them
 2 and when?
 3 **A. I know the OPUS system does and I know the PNC does, but**
 4 **I certainly wasn't aware, it is -- as I have said**
 5 **previously, it is an antiquated system, the GMPics**
 6 **system, so I was not aware. And I wasn't aware that you**
 7 **had also made that inquiry, sir.**
 8 Q. So is it a coincidence that we were investigating the
 9 accuracy and reliability, or truthfulness, of your
 10 evidence, that you accessed GMPics between 7 and
 11 29 February, have had a report back this morning to say
 12 that you did not, and then today you tell us, in fact,
 13 you want to reconsider some of the evidence that you
 14 gave on Tuesday and Wednesday this week?
 15 **A. Sir, I didn't know you was doing the transaction**
 16 **inquiry. I was not aware of that. So, yes, it is**
 17 **coincidental.**
 18 **I explained to you, when I was reviewing a number of**
 19 **statements last night, that was the one that had caused**
 20 **me concern.**
 21 Q. Do you know Anne-Marie Kay?
 22 **A. Yes, I do know Anne-Marie Kay.**
 23 Q. Have you had any contact, by any means whatsoever, with
 24 Anne-Marie Kay this week?
 25 **A. No.**

1 Q. Do you know DCI Davies -- I think it is Ryan Davies?
 2 **A. I do know him, yes.**
 3 Q. Have you had any contact with him, by any means
 4 whatsoever, this week?
 5 **A. No.**
 6 Q. Do you know an officer called DC James?
 7 **A. Karen James?**
 8 Q. Give me a moment.
 9 First name?
 10 It is a male officer, DC James.
 11 **A. No.**
 12 Q. Have you had any contact with an officer called
 13 DC James, a man, this week?
 14 **A. No, I've not had contact with -- I have not been in work
 15 this week, I have been in here the whole time.**
 16 Q. Have you had contact with any officers of GMP this week
 17 about inquiries being made as to your access to GMPics
 18 back in February 2012?
 19 **A. No, absolutely not, sir. I just explained to you,
 20 I didn't even know you could do that. If I knew you
 21 could do that, I would have checked that myself to see
 22 when I had logged on to the system.**
 23 Q. GMP's research suggests that Anne-Marie Kay accessed
 24 GMPics record for the crime ending 85B95, on
 25 21 September 2011. That was five months before, on your

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1 account, you would be looking at it after 7 February,
 2 wouldn't it?
 3 **A. Yes.**
 4 Q. Have you any recollection of her bringing a printout to
 5 you?
 6 **A. No, I mean she did -- we have used her name during the
 7 course of the hearing, in terms of she was our liaison
 8 with the Baltic and the contact, you know, with the cash
 9 carriers. So, yes, I did have contact with her but
 10 I certainly don't remember -- I don't remember ever
 11 being given the printout.
 12 I had mentioned that there was a folder with
 13 a number of documents in there, in relation to
 14 Operation Vulture, but I couldn't say what was in it and
 15 what was not in it, and I couldn't even say if I have
 16 actually looked at it. Possibly I had done, but
 17 I couldn't say.**
 18 Q. I will try once more, if you can help us, why is it
 19 reading last night your witness statement of
 20 10 January 2013 cause you to think -- that says
 21 I printed off a dozen or so crime reports; why did that
 22 cause you to think that some of the evidence I have
 23 given the Chairman about the GMPics viewing by me
 24 in February was wrong?
 25 **A. Well, because I wouldn't have just printed the crimes**

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1 **off, you would have to go into them. To print them off,
 2 you would actually have to go into them. So the point
 3 being is my assessment, on Sunday, was the fact that it
 4 was the first time that I had actually -- the first time
 5 since February that I had looked at the crimes, when, in
 6 fact, I had clearly looked at them in January.**
 7 Q. That is a different point. That is whether you failed
 8 to mention accessing some crime reports in January 2013.
 9 The issue I am interested in is what has caused you
 10 to believe that the evidence that you had given about
 11 accessing GMPics in February 2012 was wrong?
 12 **A. Well, because I didn't know if that is when I had --
 13 I didn't know if that was when I had looked on the
 14 system. When I had looked or whether it was, indeed,
 15 a printout I had seen. Whether I had looked -- when you
 16 asked me the questions in relation to where I was, what
 17 I was doing -- I can't remember if you did actually ask
 18 me the question, but I certainly wouldn't have been able
 19 to provide any detail in terms of where I was or what
 20 I was doing. And it was certainly never my intention to
 21 mislead the Public Inquiry, hence why I spoke up earlier
 22 today.**
 23 Q. What I am asking is, why did you speak up, given that,
 24 remembering that you had accessed some crime reports
 25 in January 2013 doesn't tell you one way or another

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1 whether you have given incorrect evidence about access
 2 GMPics in February 2012, does it?
 3 **A. No, I have tried to explain it.**
 4 Q. Thank you very much. Those are the questions I ask for
 5 the moment.
 6 THE CHAIRMAN: Mr Thomas, you are preparing to ask
 7 questions, are you?
 8 MR THOMAS: I am.
 9 THE CHAIRMAN: Mr Beer, have you had notice of any
 10 questions?
 11 MR BEER: Given the way things have developed, it has not
 12 been possible to undertake the normal --
 13 THE CHAIRMAN: Not in writing, quite clearly.
 14 MR BEER: Other core participants have said that they wanted
 15 to ask some questions.
 16 THE CHAIRMAN: Right. Are you content that in these
 17 circumstances we proceed in that way?
 18 MR BEER: Sir, it is probably not for me to contribute to
 19 that issue. I think it probably is for you to monitor,
 20 sir.
 21 THE CHAIRMAN: Yes.
 22 MR BEER: I have asked the questions I think are proper on
 23 the basis of the information that we have, but no doubt
 24 other core participants may have different questions or
 25 a different angle to pursue than counsel to the Inquiry.

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1 MR THOMAS: Sir, can I assist. Can I assure you the
 2 questions I have are few. They are a small handful of
 3 questions, and I do appreciate the boundaries of this
 4 but this is unique.
 5 THE CHAIRMAN: I am not going to prevent you, but it is
 6 a departure from rule 10. In the circumstances in which
 7 this has arisen, then you may proceed.
 8 Questions from MR THOMAS
 9 MR THOMAS: I am grateful, sir.
 10 I represent Mr Grainger's mother, stepfather and
 11 brother.
 12 **A. Yes, sir.**
 13 Q. Mr Cousen, I only have a few questions, and I just want
 14 to be clear in relation to the evidence that you have
 15 given.
 16 **A. Yes.**
 17 Q. You indicated that you wished the Chairman to know that
 18 there were caveats about the evidence you had given
 19 earlier this week, just before 1.00 today; correct?
 20 **A. Yes.**
 21 Q. You have just been asked -- and I don't repeat the
 22 questions that Mr Beer has asked you in relation to why
 23 that was.
 24 **A. Yes.**
 25 Q. What I would like to explore with you is some of the

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1 evidence that you gave that we haven't touched upon yet,
 2 on Tuesday 14 February.
 3 Now, I have a transcript, and you have been looking
 4 at the transcript. You have indicated that.
 5 **A. Yes.**
 6 Q. For the Chairman's record, I will give the various
 7 references.
 8 THE CHAIRMAN: Thank you.
 9 MR THOMAS: So, can I just remind you of some of the
 10 evidence you gave.
 11 Firstly, 14 February, at page 103, line 3. You are
 12 asked the question, specifically:
 13 "When you say you followed it through, what do you
 14 mean?"
 15 **A. Yes.**
 16 Q. And you say, "In GMPics"; right?
 17 **A. Yes.**
 18 Q. That is what you say, "In GMPics".
 19 **A. Yes.**
 20 Q. Then, line 24, sir, on page 103.
 21 THE CHAIRMAN: Thank you.
 22 MR THOMAS: Mr Beer asks you the very open question:
 23 "So you accessed GMPics to look at this?"
 24 Your response, "Yes."
 25 No caveats: yes, I did.

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1 **A. Yes.**
 2 Q. Not that "I would have done" or "I may have done", but
 3 "Yes, I did."
 4 That was your response. So the question is this:
 5 on Tuesday of this week --
 6 **A. Yes.**
 7 Q. -- there was no doubt in your recollection, in your
 8 memory, of you going on to GMPics, is that correct?
 9 **A. That is what I had believed and I think that is what**
 10 **I had got in my mind from looking on OPUS and on GMPics.**
 11 Q. All right, help me with this.
 12 **A. Yes.**
 13 Q. The explanation that you have just given us --
 14 **A. I haven't given all the full explanation yet.**
 15 Q. Don't let me stop you. If there is more you want to
 16 say, say it.
 17 **A. I actually contacted my Detective Superintendent last**
 18 **night to make him aware of my concerns. So it was not**
 19 **this afternoon when it was first raised. That is the**
 20 **first thing. So I had contacted my Detective**
 21 **Superintendent.**
 22 **I raised a number of issues, in terms of I wasn't**
 23 **satisfied that, in fact, I potentially read the GMPics**
 24 **report, the crime report, or that in the course of the**
 25 **conversations with my staff, following the -- off**

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1 **getting the printouts for the IPCC --**
 2 Q. Can I just ask you to pause one second. Forgive me for
 3 interrupting you. Just so we are clear, what is the
 4 name of person you were speaking to?
 5 **A. Detective Superintendent Tony Creeley.**
 6 Q. And you were discussing your evidence with him?
 7 **A. No, I was telling him that I needed some advice.**
 8 **I couldn't speak to my legal team. I had been told that**
 9 **I could not speak to them part heard.**
 10 Q. But you were discussing your evidence with him?
 11 **A. That was on -- it was already on the website.**
 12 Q. All right. Forgive me, I interrupted you. You go on,
 13 you tell us about this conversation that you had with
 14 this officer.
 15 **A. Well, I explained that I was concerned that the**
 16 **information that I had provided wasn't correct and the**
 17 **rationale for why it wasn't correct, and what would be**
 18 **the best way to go about it --**
 19 Q. All right.
 20 **A. -- to deal with it.**
 21 THE CHAIRMAN: Let him finish his answer.
 22 MR THOMAS: Forgive me, sir.
 23 **A. He told me that I would need to speak to the legal team**
 24 **or, potentially, the Chair.**
 25 Q. All right. So you said this was last night?

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1 **A. Yes.**
 2 Q. What time?
 3 **A. Probably about 8.00ish.**
 4 Q. All right. You were told that the best way of dealing
 5 with this was to bring it to the Chair's attention?
 6 **A. Yes.**
 7 Q. Why didn't you do that the very first thing this
 8 morning? Help us with that.
 9 **A. Sir, if I could just -- I actually spoke this morning to**
 10 **Ms Whyte about it.**
 11 Q. All right. So you brought it to Ms Whyte's attention
 12 this morning?
 13 **A. First thing this morning, sir. At 8.00, 8.15, this**
 14 **morning.**
 15 Q. Okay. You are saying that you had no idea whatsoever
 16 that an investigation as to the reliability of whether
 17 you had accessed GMPics, you are completely unaware of?
 18 **A. I didn't even know you could it. If I would have known**
 19 **you could do that, I would have looked on the system**
 20 **myself.**
 21 Q. But can I come back -- have you finished your
 22 explanation or is there more you wish to say?
 23 **A. No the -- sorry, I have mentioned about in the office,**
 24 **we had the files with Operation Vulture, with different**
 25 **operations. The point being, I wasn't satisfied that**

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1 **the evidence that I had given, they hadn't actually**
 2 **amalgamated lots of different parts, and when I have**
 3 **looked on the Sunday, that actually that was**
 4 **an amalgamation of a number of different areas. And,**
 5 **yes, I give evidence to it. Yes, I completely accept**
 6 **that I gave evidence in that regard.**
 7 Q. Sorry, in what regard?
 8 **A. In the regard, in terms of what I had said when I was**
 9 **giving the evidence on the Tuesday, Wednesday and**
 10 **Thursday, that I had looked on to the GMPics system.**
 11 Q. Sorry, it is more than that, officer, with the greatest
 12 of respect.
 13 Can I take you to a couple more passages, and I am
 14 going to come back to the question I have put on the
 15 shelf.
 16 **A. Yes.**
 17 Q. Because if we turn to page 105, 14 February, sir,
 18 line 18, you are specifically asked, by Mr Beer, in
 19 relation to accessing it:
 20 "When do you remember doing this?"
 21 Then you clarify the question:
 22 "Sorry, when do I remember checking the --"
 23 Q. Mr Beer says, "The GMPics."
 24 **A. Yes.**
 25 Q. Then you say:

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1 "The GMPics? Well, obviously, I have done it at the
 2 time, haven't I? I can't say exactly what dates I got
 3 the profile off DS Hurst, but I know, for a fact, that
 4 because GMPics contained more information -- I had been
 5 brought up on GMPics because when I joined the police,
 6 OPUS had come in after I had joined the police. So
 7 GMPics was my kind of bread and butter."
 8 **A. Because that is what I would have done. I would have --**
 9 **on crimes that were anything up to I think about 1999,**
 10 **2000, I would have, ordinarily, I would have looked on**
 11 **the GMPics system.**
 12 **The point being is, and the point that I was**
 13 **raising, is I was concerned that I hadn't actually done**
 14 **that.**
 15 Q. Forgive me, there is a little bit more. Page 106,
 16 line 19. So you give the "some time after 7 February",
 17 and Mr Beer asked you:
 18 "So it was after that date you checked it, checked
 19 the GMPics?"
 20 Your response:
 21 "Yes."
 22 **A. Sir, I know the answers that I have given. I know we**
 23 **are going to go through them.**
 24 Q. Bear with me, I am nearly there. I have nearly
 25 finished. I come back to the question that you haven't

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1 dealt with and I am going to repeat --
 2 **A. Yes.**
 3 Q. -- you have explained that, having looked at this
 4 statement, in January 2013, which makes reference to
 5 crime reports, you came to the view that you had
 6 accessed, or possibly accessed, some of the information
 7 from some other documents.
 8 **A. Yes.**
 9 Q. I understand that, but the question that the Chairman
 10 may be thinking about: why does that cause you to have
 11 any doubt from two days before the certainty -- because
 12 this is all bread and butter to you, this system -- that
 13 you had accessed, and remember you are the one who
 14 introduced it, you were the one who brought the
 15 documents, you were the one who produced the printout.
 16 **A. I accept that, sir, but the certainty was borne of the**
 17 **fact that when I had looked on the Sunday, at the OPUS**
 18 **and the GMPics, I believed that was the first time that**
 19 **I had looked on -- at the crime, since whenever it was**
 20 **in February.**
 21 **So, my recognition, at that point, was on the basis:**
 22 **oh right, yes, that is what I must have -- that is what**
 23 **I must ...**
 24 **Absolutely, it was.**
 25 Q. You say it is just pure coincidence, is it, that it just

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1 happens that you change your evidence -- because it is a
 2 change of evidence, isn't it? You accept that, don't
 3 you?
 4 **A. It is a change of evidence. Absolutely it is. Yes.**
 5 Q. You accept that you changed your evidence just at the
 6 point when we are about to discover you didn't access
 7 the GMPics?
 8 **A. But I didn't know that that inquiry was ongoing.**
 9 Q. That is what you say.
 10 **A. That is the truth. I didn't know that inquiry was**
 11 **ongoing.**
 12 Q. Well, you said it two days ago that it was the truth
 13 that you had accessed it, didn't you? You said that
 14 under oath, didn't you?
 15 **A. I did say that. I did say that.**
 16 MR THOMAS: That is all I ask, sir.
 17 THE CHAIRMAN: Mr Weatherby, do you have any questions?
 18 I am going to extend the same leeway to you and others,
 19 as well.
 20 Further questions from MR WEATHERBY
 21 MR WEATHERBY: Thank you very much. Just one point of
 22 further clarification.
 23 When you were mentioning about Superintendent
 24 Creeley, correct me if I am wrong, but my understanding
 25 is that you said you spoke to Mr Creeley last night

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1 about this, "amongst other things".
 2 **A. Not "amongst other things".**
 3 Q. Is that not right? Am I wrong about that?
 4 **A. No.**
 5 Q. Did you discuss anything else with Mr Creeley apart from
 6 this?
 7 **A. Not that I recall.**
 8 Q. Well, it is only last night, did you?
 9 **A. No. No. It started off as a text message where**
 10 **I basically said to him, "Can I ring you? Can I contact**
 11 **you?"**
 12 **So then I rang him up, explained what the**
 13 **predicament was that I was in, and that is when he**
 14 **advised me what I should do.**
 15 Q. And that was simply to speak to your legal team or the
 16 Chair?
 17 **A. Yes.**
 18 Q. As an experienced police officer, that was pretty
 19 obvious, really, wasn't it, what you should do?
 20 **A. I didn't know whether I needed to do a statement or --**
 21 **MR WEATHERBY: Thank you.**
 22 THE CHAIRMAN: Thank you.
 23 MR DAVIES: No, thank you, sir.
 24 THE CHAIRMAN: Anything else?
 25 MR BEER: No, thank you, sir.

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1 THE CHAIRMAN: Does that conclude the evidence of Mr Cousen?
 2 MR BEER: It does.
 3 THE CHAIRMAN: Thank you, Mr Cousen. That is the end of
 4 your evidence. You are free to go.
 5 **A. Thank you.**
 6 MR BEER: As I said earlier, we are not going to call
 7 DS Hurst.
 8 THE CHAIRMAN: Clearly a good call.
 9 MR BEER: Yes, a pretty obvious one, actually.
 10 THE CHAIRMAN: Yes.
 11 MR BEER: So can we adjourn, please, until 10.30 on Tuesday
 12 to begin another section of evidence. We will slot in
 13 DS Hurst whenever is convenient to her and the Inquiry.
 14 THE CHAIRMAN: Certainly.
 15 Thank you. I will rise. 10.30 on Tuesday.
 16 (3.58 pm)
 17 (The Inquiry adjourned until 10.30 am on Tuesday,
 18 21 February 2017)
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