

Chief Constable Paul Sanford
Jubilee House
Falconers Chase
Wymondham
Norfolk
NR18 0WW

31 August 2021

Email: ForceExec@norfolk.pnn.police.uk

By email only

Dear Mr Sanford

Our client David Brennan of Norwich CBRUK Public Education Display Team

We write on behalf of our client David Brennan to complain about the erroneous view of the law on public order recently represented to him by an officer of the Norfolk Police Force. Our aim in raising this matter is to ensure our client's safety as an educator for future, and to prevent legal proceedings becoming necessary between our client and your force. Our request is that you give the below your urgent consideration.

In July 2021, after having informed local police, our client and his team embarked upon a public education presentation about abortion in Norwich City Centre. In the course of a dialogue about the presentation they were informed by Serjeant Burwood of the Norfolk Police Force that they "had a right to protest..but not when it affected members of the public".

On Friday 23 July 2021 our client was in Norwich City Centre with the team undertaking their public education presentation, when one of his female colleagues was struck in the face by a passer-by. The police attended, having been called by members of the public. The conversation between our client and Sergeant Chris Clay which ensued was recorded and a transcript is attached.

Our client was particularly concerned to learn that Sergeant Clay believes that in the course of his peaceful public education presentation, our client was just as likely to have committed an offence as the passer-by who punched his colleague in the face.

The key section of the transcribed conversation is below:

- Speaker 1: What I am saying is that, you know, as the police we deal primarily in allegations and evidence gathering, not to say that you have committed an offence, but if someone reports it, there's just as much likelihood that a court will find that you're guilty of an offence as say, for example, the person that assaulted your colleague
- Speaker 2: Really you're saying they're equivalent.
- Speaker 1: Yeah, absolutely.
- Speaker 2: Us exercising our expressive rights is just as likely to be in contravention of the law as someone who hits someone in the face
- Speaker 1: Why not?
- Speaker 2: So you're saying that hitting someone in the face is equivalent to our, let's say, for example, our expression today, showing the reality of..
- Speaker 1: So for example, your images trigger someone who has particular trauma around an abortion due to, rape. Or an abortion due to medical conditions, and you trigger that trauma in them. How is that any worse?
- Speaker 2: So you're saying they're equivalent. You're saying, you're saying someone's emotional response to me showing and given that I'm doing in a peaceful way, and I'm not, I'm not pursuing them. I'm not assaulting them in any way, just by showing my banner. You're saying that's equivalent to hitting someone in the face.
- Speaker 1: I think in the modern world, we all know the damage that psychological trauma can cause. Yea. Do you not?

We consider this issue to be extremely serious because it has the tendency to stifle freedom of speech and is likely to lead to a breach of our client's rights under Articles 10 and 11 of the European Convention on Human Rights.

Our client would like to meet with you to discuss this matter going forward. Please advise as to when and how that might be possible.

Yours faithfully,