



Our ref. 21008210

14 January 2022

Australian Human Rights Commission
Attn: [REDACTED]
Senior Investigator/Conciliator

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By email only: [REDACTED]

Dear Mr [REDACTED]

2021-09505 & 2021-09643 – Complaint made by Damien de Pyle

1. We refer to your email of 25 October 2021, concerning a complaint by Damien de Pyle under the *Australian Human Rights Commission Act 1986* (**AHRC Act**) against the Australian Defence Force (**ADF**) alleging:
 - 1.1. a breach of human rights under the *International Covenant on Civil and Political Rights* (**ICCPR**), scheduled to the *Australian Human Rights Commission Act 1986* (Cth) (**AHRC Act**) (**ICCPR complaint**); and
 - 1.2. sexual harassment under the *Sex Discrimination Act 1984* (Cth) (**SDA**) (**SDA complaint**).
- 1.3. We confirm that the Australian Government Solicitor acts for the Commonwealth of Australia as represented by the Department of Defence (**Defence**).

THE COMPLAINT

2. Mr de Pyle alleges:
 - 2.1. he was sexually harassed during the Conduct After Capture (**CAC**) Course Level C between 4 March and 7 March 2019
 - 2.2. his human rights have been breached as a result of his treatment during the CAC Course Level C between 4 March and 7 March 2019.

RESPONSE TO AHRC'S QUESTIONS

3. CAC Level C training is designed to simulate real-world captivity situations and prepare ADF members to survive capture with dignity. Training focuses on three specific scenarios including foreign government detention, military exploitation and hostage (terrorist) situations. The training exposes trainees to likely interrogation methods and techniques employed by a non-Geneva Convention compliant adversary.
4. Participation as a trainee is voluntary. All trainees are required to sign a volunteer declaration form prior to the commencement of the training. Trainees may withdraw at any time.

5. The specific content of ADF CAC training is sensitive information, the release of which in the public domain could jeopardise the lives of ADF personnel that are captured, detained or taken hostage in the future. Therefore, Defence is not able to provide answers to some of the Australian Human Rights Commission's (**Commission**) questions to the extent that they require Defence to address the specific content of the training.
6. However, to the greatest extent possible, information has been provided below in response to each question including attached documentation to further assist both the Commission and Mr de Pyle understand the purpose of the training and the extensive mandatory procedural requirements established to ensure the physical and psychological well-being of all trainees.

Q1 – Please confirm the name of the correct legal name and ABN of the correct respondent entity for this complaint

7. The Complaint identifies the ADF as the respondent.
8. The relevant legal entity in relation to the Australian Defence Force is the Commonwealth of Australia (as represented by the Department of Defence ABN 68 706 817 312). Defence is not constituted as a separate legal entity.

Q2 – Please confirm the dates of Mr de Pyle's participation in the 'Conduct After Capture – Level C' course in March 2019

9. The dates of the CAC activity were 4 March to 8 March 2019.
10. On the morning of 4 March 2019 the trainees received a CAC Level B brief which is a pre-requisite to the Level C activity. The actual Level C immersion activity occurred from 1700 4 March 2019 until 1700 7 March 2019.
11. On the morning of 8 March 2019 the trainees underwent a training debrief with a CAC trainer followed by a debrief by an ADF Psychology Officer.

Q3 - Please outline the course purpose and content; who designed and delivered it; the number of participants; whether participation was mandatory or voluntary; what information was provided about the course purpose and content to participants prior to commencement or enrolment; whether medical or psychological assistance was available during the course and the circumstances in which it would be rendered; and if and how a participant could request to leave the course part way through

12. There are 3 levels of CAC training undertaken by selected ADF personnel. Level A – Computer based learning, Level B – Instructor lead theory presentations (approximately 4-5 hours duration) and Level C – 72 hour fully immersive practical activity.
13. CAC Level C training is generally conducted for selected ADF personnel at high risk of isolation and capture. The purpose of the course is to prepare ADF personnel to understand the rigors of captivity and exploitation while enabling them to survive the capture situation with dignity. It involves 3 modules: Hostage Survival, Foreign

Government Detention and Military Exploitation. The training is designed to simulate real-world captivity situations and incorporates: a simulation of interrogation techniques used by a non-Geneva Convention compliant foreign military; simulation of detention by foreign police and security services; and likely hostage survival situations if captured by a terrorist organisation.

14. CAC training enables trainees to build resistance to the techniques that may be used against them to ensure they resist exploitation and survive if they are ever captured, detained or taken hostage with dignity.
15. Policy guidance for the conduct of the training is contained in the following documents¹:
 - **Australian Defence Doctrine Publication 3.6 Personnel Recovery edition 3 2017.** This publication provides an understanding of the personnel recovery system incorporating CAC. Chapter 2 deals specifically with captivity situations. Annex 2A contains the legal obligations after capture and Annex 2B contains the Defence Code of Conduct which provides rules and general principles that will assist Defence personnel to survive captivity while protecting Australian interests.
 - **Land Warfare Procedure – General 2-1-3 Conduct After Capture 2018.** This publication contains the CAC procedural level doctrine. Chapter 5 deals with possible adversary interrogation systems including likely interrogation techniques to be employed against ADF members. Chapter 7 deals with CAC training in the ADF and includes specific detail on Level C activities.
 - **Joint Personnel Recovery Manual 2021.** Sponsored by the Chief of Joint Operations, this publication provides policy direction on the conduct of personnel recovery operations and incorporates elements of CAC. Chapter 11 deals specifically with training. Note: this publication also describes CAC training as ‘Resistance to Exploitation’ training.
 - **Course Code 202521 Joint CAC Level C Course Learning Management Plan.** Provides the learning management information for the delivery of CAC Level C training. It includes the course aim: “the aim of the Conduct After Capture Level C Course is to strengthen individual and group capability to combat the rigours of captivity, resist exploitation and survive with dignity”. It also includes the course description: “this course prepares ADF personnel to combat the rigours of captivity, resist exploitation and survive with dignity”.
 - **Conduct After Capture Resistance Trainers Ploy Handbook.** This handbook provides CAC Resistance Trainers (RT) with clear guidance on individual ploys utilised during CAC Level C activities.
 - **Australian Defence Force Conduct After Capture Mental and Physical Stressors Handbook.** This handbook provides guidance on the approved

¹ Copies of these policies cannot be provided. The specific content of these policies is sensitive and disclosure in the public domain could jeopardise the lives of ADF personnel that are captured, detained or taken hostage in the future.

stressors, either physical or psychological, that may be employed during an ADF CAC Level C activity.

- **Defence Force School of Intelligence CAC Restraint Guide 2017.** This publication provides practitioner direction on the use of restraints during a Level C activity.
16. Specific to Mr de Pyle's Level C training are the following:
- **Level C activity Administration Instruction** including risk assessment and Health support plan. See enclosure 1.²
 - **Level C Conducting Officer Orders and Safety Brief.** Delivered to activity staff and Resistance Trainers prior to the commencement of the Level C activity. See enclosure 2.³
 - **CAC Level C Authorised Stressors Session 48.**⁴
17. CAC training is delivered by the CAC Wing of the Defence School of Intelligence which is the only ADF unit authorised to deliver this type of training. A level C activity is normally conducted for about 25 trainees.
18. It is mandatory that participants undergo a Level B briefing not more than 6 months prior to the Level C activity. The Level B briefing provides the theory lessons to CAC and includes a Level C brief. The Level C brief advises trainees that the activity involves: simulated captivity situations including interrogation; the use of physical and psychological stressors; nudity; faked emotions and tricks; and significant discomfort to the trainees. The Level C brief also advises the training is voluntary and trainees have the right to withdraw at any time. A copy of the Level C brief is included as enclosure 3.⁵
19. Participation as a trainee is voluntary. All trainees are required to sign a volunteer declaration form prior to the commencement of the training. Trainees are then individually required to reaffirm their volunteer status for the Conducting Officer at the commencement of the activity. Mr de Pyle's Volunteer Declaration Form is included as enclosure 4.
20. At all times during a Level C activity it is mandatory for 2 ADF Psychology Officers to be present. They observe CAC sessions and provide advice to the Conducting Officer relating to the psychological well-being of the learners. An ADF Medical

² Enclosure 1: Information identifying individuals and sensitive information has been redacted.

³ Enclosure 2: Sensitive information redacted and only the safety briefing is provided. The release of the redacted information in the public domain could jeopardise the lives of ADF personnel that are captured, detained or taken hostage in the future.

⁴ CAC Level C Authorised Stressors Session 48 cannot be disclosed. The release of authorised stressors in the public domain could jeopardise the lives of ADF personnel that are captured, detained or taken hostage in the future.

⁵ Enclosure 3: Sensitive information redacted. The release of this information in the public domain could jeopardise the lives of ADF personnel that are captured, detained or taken hostage in the future.

Technician is also on site at all times. They are supported by the activity Health Support Plan and an on-call ADF Medical Officer. Trainees have the right to request psychological or medical treatment at any time by raising their right arm.

21. As a further safety measure a Neutral Observer is also present at all times. They are of minimum rank of Warrant Officer Class One or Major and have the power to immediately stop training if they deem it to be of risk to trainee wellbeing or outside of policy. The Neutral Observer reports for Mr de Pyle's Level C activity are included as enclosure 5.⁶
22. Mr de Pyle did not request to speak with a Psychologist, Medical Technician or Neutral Observer at any stage during the activity. On his trainee debrief form (enclosure 6) he indicated he was not hurt or harmed during the activity and did not need medical attention.⁷
23. All trainees have the right to withdraw from the training at any time. Trainees are advised of this during the Level C brief, in the volunteer declaration form and individually by the Conducting Officer at the commencement of the Level C activity. If a trainee wishes to withdraw, they raise their right arm (or verbalise "right arm up") and ask to speak to the Conducting Officer. Whatever session or activity they are involved in at the time ceases immediately. At no point during the activity did Mr de Pyle request to withdraw.⁸

Q4 - Please confirm Mr de Pyle's course outcome. (The Record of Service says that he achieved a 'pass grade')

24. CAC Level C training is an attendance only course and not graded. Mr de Pyle completed the training and was subsequently awarded the training proficiency. His trainee debrief form is included as enclosure 6.

Q5 - Please comment on whether Mr de Pyle was subject to the following alleged acts during the course and whether they amount to a breach of his human rights under Articles 7 and 10(1) of the ICCPR.

Q6 - Please comment on whether Mr de Pyle was subject to the following alleged acts during the course and whether they amount to a breach of his human rights under Articles 7, 10(1) and 18 of the ICCPR.

Q7 - Please comment on whether Mr de Pyle was subject to the following alleged acts during the course and whether they amount to unlawful sexual harassment under sections 28A, 28B and 106 of the SDA.

25. Questions 5, 6 and 7 relate to the content and delivery of ADF CAC training and the following response is provided.
26. The specific content of ADF CAC training is sensitive information, the release of which in the public domain could jeopardise the lives of ADF personnel that are captured, detained or taken hostage in the future. Therefore, the specifics of these

⁶ Enclosure 5: Information identifying individuals has been redacted.

⁷ Enclosure 6: Information identifying individuals has been redacted.

⁸ Refer to the volunteer declaration form at Enclosure 5 and Level C activity brief at Enclosure 3.

questions will not be addressed. CAC Level C training is designed to simulate real-world captivity situations and prepare ADF members to survive capture by foreign governments and terrorist organisations. The training exposes trainees to likely interrogation methods and techniques employed by a non-Geneva Convention compliant adversary.

27. The Defence School of Intelligence retains all CCTV and video footage of Level C activities as training records. This includes all footage relating to Mr de Pyle's CAC sessions, time in holding cells and when moving between CAC sessions.
28. The CAC sessions Mr de Pyle participated in are listed in enclosure 7.⁹
29. A review of the activity Guard Commander Log indicates Mr de Pyle requested and was allowed to go to the toilet 11 times during the 72 hour activity. This does not include any additional requests he may have made whilst moving to or from sessions. This detail is not normally captured in the Guard Commander Log.
30. A review of the activity Guard Commander Log indicates Mr de Pyle was provided water 28 times during the activity. Normally this is a cup of approximately 200ml. This record does not include the time in the hostage survival phase where a bucket of water and cups are left in the hostage huts and trainees are able to help themselves. Mr de Pyle was fed 3 times during the 72 hour activity which was designed to simulate captivity situations. In addition to this, as part of "soft" interrogation sessions trainees are normally provided a drink and some food. Generally this will consist of a coffee and some biscuits or a piece of fruit.
31. Normal CAC Level C practice is for the trainee to be debriefed by the trainer who was responsible for delivering the most confronting session to that individual. This provides an opportunity for the learner to specifically ask questions about that session and to clear up any lasting reservations. In accordance with this practice Mr de Pyle was debriefed by the trainer who delivered session 6 to him (military exploitation scenario – the session relevant to Mr de Pyle's complaints) (see enclosure 6).
32. At all times during the activity Mr de Pyle retained the right to withdraw from the training if he was uncomfortable with the conduct of the activity as outlined in the Level C brief (enclosure 3) and Mr de Pyle's Volunteer Declaration Form (enclosure 4).

Alleged sexual harassment – s 28A of the SDA

33. Defence maintains that the specific content of ADF CAC training is sensitive information, the release of which in the public domain could jeopardise the lives of ADF personnel that are captured, detained or taken hostage in the future. However, Defence submits that it is relevant to consider the circumstances of the CAC Level C training as to whether a reasonable person would have anticipated the possibility

⁹ Enclosure 7: Sensitive information redacted. The release of this information in the public domain could jeopardise the lives of ADF personnel that are captured, detained or taken hostage in the future.

that Mr De Pyle would have been offended, humiliated or intimidated for the purposes of s 28A of the SDA.

34. The Full Court in Hughes trading as *Beesley and Hughes Lawyers v Hill* [2020] FCAFC 126 (*Hughes*) observed that there are essentially three elements to s 28A, and once it is established that there was conduct of a sexual nature towards another and that the conduct was unwelcome (the first two elements), the provision imposes an objective delimitation on the provision's ambit. The 'circumstances' are defined broadly in s 28A(1A) and include, importantly for this case, the relationship between Mr de Pyle and Defence in the context of the CAC Level C training.
35. The Full Court in Hughes further considered at [26] and [27] that:
 - 26 In answering this question, the reasonable person is assumed by the provision to have some knowledge of the personal qualities of the person harassed. The extent of the knowledge imputed to the reasonable person is a function of the 'circumstances' which the provision requires be taken into account. Mention has already been made of the nature of the relationship between the harasser and the harassed. It is convenient also to note that the circumstances will include any disability the harassed person is suffering from (subs (1A)(c)) as well as matters such as sex, age, religious belief or sexual orientation (subs (1A)(a)). But the list in subs (1A) is merely inclusive so that other unspecified but relevant circumstances may also be taken into account. The canvas is broad.
 - 27 Equipped then with that information, the question to be asked is whether the reasonable person would have anticipated the possibility that the person harassed would be offended, humiliated or intimidated. Each of these is different in kind and it should not necessarily be thought that they are arranged in order of seriousness. It may, in some cases, be worse to be deeply offended than it is to be slightly humiliated.
36. The 'reasonable person' in this case, must have regard to the circumstances of the CAC Level C training and the purpose of that course, including:
 - 36.1. CAC Level C training is designed to simulate real-world captivity situations and prepare ADF members to survive capture by foreign governments and terrorist organisations with dignity. The training exposes trainees to likely interrogation methods and techniques employed by a non-Geneva Convention compliant adversary.
 - 36.2. Trainees must undergo CAC Level B briefing within the 6 months prior to participating in CAC Level C training. Level B briefing provides theoretical training for the purposes of providing tools/strategies in preparing for CAC Level C training (enclosure 3).
 - 36.3. Trainees must participate in the CAC Level C Activity Brief before participating in CAC Level C training. CAC Level C Activity Brief provides trainees with the relevant nature of the CAC Level C training to assist prepare them for what is to come, including:
 - 36.3.1. trainees are reminded that 'what they see and experience is all based on acting – no real malice is held by anyone dealing with them'

- 36.3.2. trainees are briefed that on capture every effort, including questions, physical and psychological stress, trickery, impersonation, intimidation, insinuation and lies will be made to extract information from them
 - 36.3.3. trainees are reminded that the CAC Level C training is voluntary and they may withdraw at any time. Withdrawal is confidential and there is no involvement in training by the unit staff
 - 36.3.4. trainees are advised that if they make a mistake during training, they may self-correct by identifying the error and can change their behaviour (response) half-way through a situation (realignment). Trainers will also attempt to re-align trainees during the session (enclosure 3).
- 36.4. Trainees are required to complete a voluntary declaration, which notes that the trainee may request to see a neutral observer or medical staff at any time or request to withdraw from the activity at any time (enclosure 4).

Alleged breach of Art 7 of the ICCPR – prohibition against torture

37. Article 7 of the ICCPR relevantly prohibits torture and cruel, inhuman or degrading treatment or punishment. Australia is also a party to the *Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment* (the **CAT**), which contains similar prohibitions. Further the prohibition against torture is generally regarded as a peremptory norm of international law from which no derogation is permitted.¹⁰
38. The prohibition against torture and cruel, inhuman or degrading treatment or punishment is implemented in Australia through the criminal law at the Commonwealth, State and Territory level. Relevantly the *Crimes Act 1900* (ACT) – which is part of the law of the Jervis Bay Territory and applies to members of the ADF wherever they are by operation of s 61 of the *Defence Force Discipline Act 1982* (DFDA) – includes a range of offences against the person, from common assault at the lower end (s 26), to torture (s 36)¹¹ and murder (s 12) at the other. Together these offences have the effect of criminalising both torture and cruel, inhuman or degrading treatment. As outlined below, the ADF Investigative Services (ADFIS) has undertaken an investigation into Mr de Pyle’s complaints and identified no service offences under the DFDA.
39. Torture is defined in Art 1(1) of the CAT as:
- any act by which severe pain or suffering, whether physical or mental, is intentionally inflicted on a person for such purposes as obtaining from him or a third person information or a confession, punishing him for an act he or a third person has committed or is suspected of having committed, or intimidating or coercing him or a third person, or

¹⁰ *Prosecutor v Furndzija* (International Criminal Tribunal for the Former Yugoslavia, Trial Chamber, Case No IT-95-17/1-T, 10 December 1998), [153].

¹¹ Section 274.2 of the Criminal Code in the *Criminal Code Act 1995* contains an offence of torture in similar terms.

for any reason based on discrimination of any kind, when such pain or suffering is inflicted by or at the instigation of or with the consent or acquiescence of a public official or other person acting in an official capacity.

40. While Mr de Pyle's complaint specifically relates to Art 7 of the ICCPR, the definition in Art 1(1) of the CAT can be drawn upon for the purposes of interpreting the scope of the term 'torture' in Art 7 of the ICCPR.
41. The purpose of the CAC Level C Training is to prepare ADF personnel to understand the rigors of captivity and exploitation while enabling them to survive the capture situation with dignity. This purpose is explained to participants who must volunteer to participate and know that they may withdraw at any time. Without addressing issues relating to the level of pain or suffering required to constitute torture, it is clear that the purpose required for an act to amount to torture is missing from the CAC Level C Training.
42. In contrast to the prohibition against torture, the prohibition against cruel, inhuman or degrading treatment does not have a purposive element. Conduct undertaken for any purpose can amount to cruel, inhuman or degrading treatment. Determining whether treatment or punishment is cruel, inhuman or degrading requires consideration of the circumstances of the individual case, including 'the duration and manner of the treatment, its physical and mental effect as well as the sex, age and state of health of the victim'.¹²
43. Defence submits that conduct undertaken for training purposes, during a course for which participants have volunteered, after first completing computer based and instructor led training on conduct after capture, and from which they may withdraw at any time (including if they are finding the physical and psychological stressors too great) does not amount to cruel, inhuman or degrading treatment.

Alleged breach of Art 10(1) of the ICCPR – requirement to treat persons deprived of their liberty with humanity and respect

44. Art 10(1) of the ICCPR provides that 'all persons deprived of their liberty shall be treated with humanity and with respect for the inherent dignity of the human person'.
45. Defence submits that Art 10(1) is not applicable to the CAC Level C Training because participants are not deprived of their liberty within the meaning of Art 10(1) in the context of a training course in which they have volunteered to participate and in circumstances where that participation can be terminated at any time.¹³
46. Even if conditions during the CAC Level C Training course did amount to deprivation of liberty within the meaning of Art 10(1), the question of whether treatment during that period was inhumane or failed to respect the inherent dignity of the participants

¹² See *Vuolanne v Finland*, No 265/1987.

¹³ General Comment No 21 of the Human Rights Committee notes that Art 10(1) applies to anyone deprived of liberty under the laws and authority of the State who is held in prisons, hospitals—particularly psychiatric hospitals—detention camps or correctional institutions or elsewhere. The CAC Level C training does not fall into this category.

needs to be assessed by reference to the circumstances and purposes of the training course and the knowledge of this held by both participants and trainers.

Alleged breach of Art 18 of the ICCPR – freedom of religion

47. Article 18 of the ICCPR relevantly provides:
1. Everyone shall have the right to freedom of thought, conscience and religion. This right shall include freedom to have or to adopt a religion or belief of his choice, and freedom, either individually or in community with others and in public or private, to manifest his religion or belief in worship, observance, practice and teaching.
 2. No one shall be subject to coercion which would impair his freedom to have or to adopt a religion or belief of his choice.
48. As noted by Mr de Pyle in his complaint, the Human Rights Committee has observed in its *General Comment No 22: Article 18 (Freedom of Thought, Conscience or Religion)* (1993) that Art 18.2 bars coercion that would impair the right to have or adopt a religion or belief, including the use or threat of physical force or penal sanctions to compel believers...to recant their religion or belief.
49. Defence submits again that the context of the CAC Level C Training needs to be borne in mind in assessing whether any conduct occurring during such training could breach Art 18(2). Participants are aware that they are participating in a simulation and that the purpose thereof is to help them to understand what may occur if they were captured by a range of hostile entities and what techniques can be used to minimise harm and protect their dignity. Assistance can be sought during the training to determine response strategies and withdrawal is an option at any time. To the extent that any coercion to renounce religion is imposed on participants during the conduct of the training, they are aware when it is occurring that it is simulated (no real renouncement of religion is required) and that any threats made will not have real-world consequences at the conclusion of the training. That is participants remain free to hold and practice their religion.

Q8 - Mr de Pyle says he made a complaint about these issues to ADF Investigative Services in August 2020. Please outline the steps taken to investigate his claims and the outcomes or findings.

50. On 25 August 2020, Mr de Pyle made a formal complaint about his treatment during the CAC Level C training course and what he perceived to be “illegal treatment from one of the trainers”. In particular, Mr de Pyle took issue with alleged conduct that simulated a scenario that required him to renounce his faith.
51. The complaint was referred to ADFIS.¹⁴
52. On 26 August 2020, investigators spoke with Mr de Pyle about the substance of his complaint.

¹⁴ ADFIS now sits within the Joint Military Police Unit (JMPU). However, for the purpose of this response we refer to ADFIS as the investigative arm. The role of ADFIS is to investigate service offences, namely contraventions of the *Defence Force Disciplinary Act 1982*.

53. On 1 September 2020, investigators interviewed a relevant person about the content of CAC Level C training course and the matters raised by Mr de Pyle. Mr de Pyle's service medical records were also obtained.
54. In support of the ADFIS investigation Defence School of Intelligence staff reviewed Mr de Pyle's training records and provided CAC subject matter expert comment.
55. On 4 September 2020, Mr de Pyle provided a formal statement to investigators.
56. On 19 October 2020, ADFIS completed the investigation and identified no service offences under the DFDA that would warrant further involvement from Military Police at that time. The matter was referred back to Mr de Pyle's regiment, 5 RAR, for continued welfare support.

Whether Defence is willing to try and resolve the complaint through a conciliation process

57. Defence confirms that it is willing to participate in a conciliation conference. However, for the reasons stated above the specifics of the CAC training, including the alleged acts, will not be able to be discussed even in the context of a confidential conciliation. This is because the sensitive nature of the training means that it cannot be spoken about via an unclassified transmission – or in the presence of people who do not hold a security clearance – and a 'need to know.'
58. It should also be noted that any claim for post-traumatic stress disorder, or any other psychological condition, made to the Department of Veterans' Affairs is outside the scope of this complaint and the jurisdiction of Defence. Defence notes that the complainant has alternate review rights in respect of any claim for compensation made to the Department of Veterans' Affairs.
59. Despite the above Defence is open to hearing from Mr de Pyle about his experience and the concerns that he has raised about the CAC training.

Yours sincerely



Catherine Mann
Senior Executive Lawyer



Leisa Pendle
Senior Lawyer



Enclosures:

Enclosure 1 Level C Activity Administration Instruction

- Enclosure 2** Level C Conducting Officer Orders and Safety Brief
- Enclosure 3** CAC Level C Activity Brief
- Enclosure 4** Mr de Pyle's Volunteer Declaration Form
- Enclosure 5** Neutral Observer reports for Mr de Pyle's Level C activity
- Enclosure 6** Mr de Pyle's trainee de-brief form
- Enclosure 7** CAC sessions Mr de Pyle participated