INVESTIGATION UNIT TRAINING PACKAGE

(E)

EVIDENCE MODULE

Units

Unit E1	**Types of Evidence**
Unit E2	Rules of Evidence

Unit E1: TYPES OF EVIDENCE

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Objectives

By the end of this unit you will be able to:

- construct a theory of the case based on evidence to be produced
- discuss upon whom the burden of proof lies and to what standard
- determine whether a person or an exhibit is able to be considered for evidential purpose

Types of Evidence

INTRODUCTION

In any court hearing there are two related functions - determining the particular facts of this case, and applying the relevant law to the facts of this case.

Evidence assists in the process of determining the particular facts of the case by witnesses both telling of those facts and providing documents and other similar physical items which contribute to those facts.

THE THEORY OF THE CASE

In examining the investigation process, it becomes essential to develop a theory of the case, before the court hearing. A theory of the case is your position and approach to all the undisputed and disputed evidence which will be given to the Court.

All the undisputed facts, together with your version of the disputed facts should be interpreted to create a logical, cohesive position for the hearing. At the conclusion of the hearing, the aim is to have the more plausible explanation than the defence counsel of "what really happened" for the Judge.

The theory of the case is developed by:

a) reviewing all the ingredients of the prosecution.

b) analysing how you intend to prove each of these required ingredients through available witnesses and exhibits.

c) analysing the disputed evidence (if known) and anticipate the witnesses and exhibits which will be available for the defence.

d) researching any evidentiary problems that may arise with Legal Services.

e) reviewing all advisable evidence for both yourself and defence for each ingredient of the offence to determine the greatest weaknesses in each side.

This will give a realistic picture of the chance of success and will highlight any evidentiary problems.

BURDEN OF PROOF

It is up to the prosecution to prove the case against the defendant. It is for this reason that the defendant may choose not give evidence in any trial, because it is not up to the defendant to answer a case, but for the prosecution to prove it to the required standard (see below).

Therefore, the prosecution must bring evidence which is legally admissible sufficient to prove beyond a reasonable doubt the essential ingredients of the offence charged. This may be of spoken evidence and/or documentary evidence.

STANDARD OF PROOF

It is up to the prosecution not only to prove the case against the defendant but to prove the case "beyond reasonable doubt." This is the criminal standard of proof and what is meant when it is said that an accused person is presumed to be innocent. If proof to a criminal standard is available of the accused's guilt, the presumption of innocence is overturned.

The standard required has been stated as follows:

> "It need not reach certainty, but it must carry a high degree of probability. Proof beyond a reasonable doubt does not mean proof beyond the shadow of a doubt. The law would fail to protect the community if it admitted fanciful possibilities to deflect the course of justice. If the evidence is so strong against a man as to leave only a remote possibility in his favour, which can be dismissed with the sentence: "...of course it is possible but not in the least probable" the case is proved beyond reasonable doubt, but nothing short of that will suffice."
>
> Miller v Minister of Pensions
> [1947] 2 ALL ER 372.

WITNESSES

In order to call a witness to give evidence for the prosecution, the witness must be both **competent** and **compellable**.

A competent witness is one who does not suffer from a legal disability in giving evidence. While there are some categories of incompetent witnesses, such as a defendant called by the prosecution, it is a question of fact whether others are incompetent. For example, a child is competent if they understand the meaning of truth telling, and similar rules apply to mentally deficient persons. Whether or not a witness is competent is ultimately a question for the Judge, but the question must be raised well before the hearing if there

are witnesses whose competency is in doubt. Discussion with your local Legal Services solicitor would be helpful.

Compellable witnesses are those who are able to be summonsed to give evidence against the other party. There are few who are not compellable, but the important exceptions are listed below.

a) **The defendant** - the defendant is not able to be summonsed by the prosecution, but may chose to give evidence themselves. Thus, the defendant is a competent, but not a compellable witness. If they give evidence, they are not then allowed to refuse questions on cross examination even if the answer will incriminate themselves.

b) **The defendant's spouse** - the legally married spouse of the defendant is in the same position as the defendant. They do not have to give evidence, but if they do, they can only give evidence for the defence and must answer all questions. Again, the witness will be competent, but not compellable.

Interestingly, children of the defendant and the defendant's spouse are both competent and compellable witnesses against the defendant.

c) **Bank officers** - there are special rules about evidence given by bank officers. It is normal for their evidence to be given by written briefs, and copies of bank accounts provided. Only if there is a Court Order would a bank officer be needed to give evidence. This is a concession for the banking industry to save the time of bankers and to protect them and their customers from the inconvenience of producing the originals of their books. Thus they have a limited compellability.

d) **Solicitor-client privilege** - if there is any communication between client and solicitor, then that communication is privileged. Thus, any correspondence or similar material between solicitor and client cannot be used as evidence against a defendant. The solicitor can be called by the defendant, in which case the privilege must necessarily be waived by the defendant

e) **Other relationships** - communications between defendant and others with whom he has a special relationship may also be privileged - priest or pastor, doctor, counselor and others. While these people can give evidence, they can only do so if the privilege is waived by the defendant. Please check with your Legal Services Solicitor if there is any doubt over the availability or usefulness of a witness.

EXHIBITS

Every exhibit must meet three basic requirements before it can be admitted in evidence. These are:

1. **The qualifying witness must be competent.**
   This is unlikely to cause too much difficulty providing that the appropriate witness is available. The witness will ordinarily have first hand knowledge of the exhibit, because he or she will have previously seen it or know the underlying facts.

2. **The exhibit must be relevant**
   Relevance can usually be established by reference to the issues raised or the ingredients of the offence.

3. **The exhibit must be authenticated**
   Authentication involves establishing that the exhibit is in fact what it purports to be. For example, the benefit review form must be the actual form, and not a copy. It must also be proved (or admitted) that the defendant was the person who signed the document.

TEST

1. Why is it necessary to develop a theory of the case?

2. What is the criminal standard of proof, and what does this mean in relation to a benefit fraud case?

3. When can the following give evidence?:
   - the defendant
   - the wife of a defendant
   - the 18 year old child of the defendant
   - the defendant's lawyer
   - the defendant's priest who received a confession in his confessional

ANSWERS

1. **Why is it necessary to develop a theory of the case?**

   It is necessary so that all the evidence can be examined in reference to all the ingredients of the offence and any strengths and weaknesses can be highlighted or explained.

2. **What is the criminal standard of proof, and what does this mean in relation to a benefit fraud case?**

   The criminal standard of proof is "beyond reasonable doubt". This means that in a benefit fraud case there is no realistic explanation for the defendant to show why the ingredients of the offence do not amount to fraud. Any possibilities - he didn't sign the forms, he didn't understand English and the like - will have been examined and reasons shown why these cannot apply - in the question and answer statement, and other witness' statements.

3. **When can the following give evidence?:**
   - the defendant
   - the wife of a defendant
   - the 18 year old child of the defendant
   - the defendant's lawyer
   - the defendant's priest who received a confession in his confessional

a) Only the defendant can give evidence for himself - he cannot be called by the prosecution.

b) The wife of the defendant cannot be called by the prosecution, though a de facto spouse can be called by the prosecution. Only the defendant can call this witness.

c) The child can be called by the prosecution.

d) The solicitor and priest can be called to give evidence by the prosecution but do not have to give any evidence against the defendant unless the defendant waives privilege. This is unlikely.

NEXT UNIT - UNIT E2: Rules of Evidence

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EVIDENCE MODULE

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Unit E2	***Rules of Evidence***

Unit E2: RULES OF EVIDENCE

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Objectives

By the end of this unit you will be able to:

- distinguish between different categories of evidence
- decide whether a or not a piece of evidence is or can be admissible
- Talk about how to present evidence in an admissible form

Rules of Evidence

INTRODUCTION

The law of evidence is a set of rules and principles which determines:

- what facts may and what may not be proved in particular cases
- what sort of evidence must be given of a fact which may be proved
- in what manner the evidence must be produced to prove a fact

An investigator must apply these rules when deciding whether a case meets the evidential sufficiency standards to determine whether prosecution action is appropriate.

FUNDAMENTAL PRINCIPLES

The Evidence Act has fundamental Principles which are set out below: -

Relevance (section 7)

All 'relevant' evidence is admissible unless the Evidence Act 2006, or some other Act says it is not admissible.

'Relevant' means it has the tendency to prove or disprove anything that is of consequence to the judge or jury in making a decision.

The general exclusion (section 8)

There are some general exclusion rules that determines whether some evidence must be excluded if it fails the test in this section. The test is a balancing process between the **probative** value of the evidence and the risk that the evidence will either be **unfairly prejudicial** or needlessly **prolong** the case.

Probative

Probative value means how helpful the evidence is to the judge in making a decision.

Prejudicial

When is evidence unfairly prejudicial? Almost all evidence that is presented in court is prejudicial. If it is not prejudicial there is no point producing it. The issue is when the prejudice becomes unfair. It is not possible to be definitive about when the prejudice is fair or unfair. That will depend on the case and the nature of the evidence.

An example is a client who has previously been convicted of credit card fraud. That conviction is relevant because it shows the client is capable of dishonest behaviour. However it would be considered unfairly prejudicial because it would significantly affect the judge's perception of the client while having nothing to do with the case.

Prolong
Evidence will needlessly prolong the case if it will open up an issue that will take up a significant amount of hearing time, while being of marginal assistance to the judge in making a decision.

If the judge thinks that the probative value will be outweighed by either the unfair prejudice or the risk that the case will be needlessly prolonged, then the evidence must be excluded.

SPECIFIC RULES

Opinions (sections 23-26)

Witnesses are generally only allowed to say what they saw, heard or did. They are not allowed to state their opinions.

However there are two exceptions to this rule. A witness is allowed to state their opinion if it is necessary for them to do that in order for the judge to understand what the witness saw, heard or perceived.

As an example a witness to a traffic accident is allowed to say what speed they thought a car was travelling. This is an opinion. However it is necessary to state that opinion if the judge is to understand what the witness saw.

For the same reason, a witness who has met two people is allowed to say whether they thought they were a couple.

The second exception is an expert witness (for example an accountant) is allowed to give an opinion so long as the opinion is within the expert's field of expertise.

It is therefore important that evidence collected from a witness during an investigation focuses on the facts that the witness can provide in the first instance. This would include but is not limited to: -

- When they met the person
- How they met
- How long they have known them
- What they saw
- How many times they interacted with the person
- What the suspects did

Once you have established the facts your witness may offer an opinion about what they thought of the situation. It is pertinent to point out that many people make assumptions with the facts, it is therefore extremely important that your evidence collecting starts with collecting facts before opinions.

Defendant's statements (sections 27-30)

The general rule is that a statement made by a defendant is admissible as evidence in the proceeding.

A statement that has been unfairly obtained may be held to be inadmissible. The Ministry's standard caution has been designed to meet the obligations of fairness.

Examples of when a statement may not be admissible generally arise from acts of unfairness or unlawfulness. Examples of this could include the incorrect use or administration of the caution or unfair duress.

However, the statement is not admissible against any co-defendant in the proceeding. That means in a relationship prosecution where both him and her have been charged (and even if you have charged them jointly or as parties to each others' offending), his statement is admissible against him only, and her statement is admissible against her only.

Previous consistent statements (section 35)

A previous statement made by a witness that is consistent with what the witness says in court is not admissible.

That is why a witness in court does not produce the statement they gave during the investigation. They have to simply tell their story without referring back to earlier statements they made.

That is also why if you call an ex partner as a witness he can not produce his employment application showing his address, or his finance applications showing his address.

However, previous statements can become admissible in two situations:

The first is where in the courtroom, the witness can not remember something (and the information is contained in the previous statement).

The second is where the witness is cross examined by defence counsel and their truthfulness or accuracy is challenged (and the challenge is based on a previous inconsistent statement or a claim of recent invention.

Veracity (sections 36-39)

Veracity refers to the witness's honesty.

The prosecution is permitted to produce evidence as to the defendant's veracity in limited circumstances. First, the evidence must be substantially helpful. If that requirement is satisfied, the evidence may be produced if the defendant has offered evidence of their own veracity, or if the defence has challenged the veracity of a prosecution witness by referring to facts that are not connected to the case.

For any other witness, evidence may be produced about their veracity as long as the evidence is substantially helpful.

Propensity (sections 40-43)

Propensity evidence is evidence that a person habitually behaves in a certain way or has a certain state of mind. Before the Evidence Act 2006 this was known as "similar fact" evidence. The production of propensity evidence in benefit fraud cases is so unusual that the propensity rules do not need to be taught in this module. You just need to be aware of this rule and know where to find the rules if you need them.

HEARSAY RULE (SECTIONS 16-22)

The hearsay rule (section 17)

Hearsay is:

- An assertion
- Made by somebody who is not a witness
- That is offered in evidence to prove the truth of its contents

In general, evidence that is hearsay is not admissible.

See the definition of "hearsay statement" and "statement" in section 4.

Assertion

An "assertion" can be defined as a statement that something is true.

Section 4 clarifies that an assertion can be spoken, in writing, or non-verbal conduct such as a nod of the head.

So, you need to distinguish between statements that are assertions and statements that are not.

An example could be derived by imagining that you are at a party. The host introduces you to a man and says "this is Richard". The host is asserting that the man's name is Richard because he is saying this is his name.

Now imagine you are observing the host, who is not talking to you at all. You see the man come up to the host, who says "hi Richard". In this instance the host is not asserting that the man's name is Richard, he is just greeting him.

Somebody who is not a witness

This part of the definition is self explanatory.

In a prosecution the defence has the option of calling no evidence at all, or only calling the defendant as a witness. If the prosecution is not calling a person who has made a helpful statement, then that statement is in danger of being inadmissible.

This rule would occur if a witness gave an investigator a statement but would not or did not appear to give evidence. The investigator is unable to introduce or present 'the helpful statement' during the hearing.

Offered in evidence to prove the truth of its contents

This is about the reason you have for offering the statement as evidence.

Imagine in your investigation you have a partner who has told his employer that he lives at a certain address. This happens to be the same address that the mother of his children has supplied to Work and Income. You want the statement by the partner to his employer to go in as evidence. Why? Because if he gave that address to his employer then it must be true that he lived there. Are you offering that statement in evidence to prove the truth of its contents? Yes you are.

Now imagine you are calling the landlord as a witness. The landlord says he spoke to the husband about rent arrears and the husband promised him they would pay $300 by the end of the week. Are you offering the husband's promise in evidence to prove the truth of its contents? No. You do not care if they were going to pay $300 by the end of the week or not. What you care about is that the husband was speaking to the landlord about the rent for the house at all, and that the husband was presenting as taking joint responsibility for payment.

So as previously stated 'hearsay evidence' is generally not admissible. However, there are some general exceptions to the 'hearsay rule'.

The general exception to the hearsay rule (section 18)

Hearsay evidence, despite section 17, is only admissible if the following factors are present:

(a) the circumstances relating to the statement provide reasonable assurance that the statement is reliable (i.e. the statement looks believable),

and

(b) either

(i) the maker of the statement is unavailable as a witness
or
(ii) the judge considers that undue expense or delay would be caused if the maker of the statement was required to be a witness

Statement looks believable

Witness is unavailable

Someone is only "unavailable" if they meet the definition of that word in section 16.

A person is "unavailable" only if they are:

(a) Dead, or
(b) Outside New Zealand and it is not reasonably practicable for them to be a witness
(c) Unfit due to their age, physical condition or mental condition (medical evidence would be required)
(d) Unable to be identified or found (evidence of reasonable efforts would be required)
(e) Not legally compellable as a witness (very unusual)

The business record exception to the hearsay rule (section 19)

"Business record" is defined very widely in section 16.

A "business" is any business, profession, trade, manufacture, occupation, or calling, and includes the activities of any department of State, local authority, public body, body corporate, organization or society.

A "business record" is a document made in the course of a business from information supplied by a person who had or who may be reasonably supposed to have had personal knowledge of the matters dealt with.

Business records are full of hearsay evidence. For example, a power company's diary notes can contain pages and pages of notes made of

telephone contact with the customer. The notes will have been made by numerous staff members. If the hearsay rule applied to such records that would mean each staff member would have to be called as a witness. The business record exception effectively means that one staff member of the power company can give evidence of all of the notes.

However it is important to recognise what the business records exception can achieve and what it can't. It is designed to enable business records to be produced without needing to bring numerous witnessed to court who will probably have no recollection of the records that they made. It is not designed to take evidence that was originally inadmissible (for example because it was prejudicial, or an opinion, or hearsay) and to make it admissible simply because it is preserved in a business record.

To illustrate, take the earlier example of the partner who has told his employer that he lives at a certain address. The employer has got the partner to fill out a form with his personal details. A staff member of the employer (staff member A) has then entered those details onto the employer's computer system.

If the original form has not been destroyed, could it be produced in evidence? This question is answered by checking the definition of hearsay:

- Is the statement an assertion? Yes, the partner is saying "my address is blah blah"
- Is the statement made by somebody who is not a witness? This depends on the case, but presumes the partner is not a witness.
- Is the statement offered in evidence to prove the truth of its contents? Yes, the purpose of producing it would be to have the judge believe that the partner did indeed live at blah blah address

All the requirements of hearsay are met, therefore the original form would be inadmissible.

If the original form has been destroyed, logically should the computer note be able to be produced in evidence? Clearly it would make no sense for the computer note to be admissible when the original form was not.

However imagine that the original form would have been admissible for some reason, perhaps because the defence has made it clear that the partner will be called as a defence witness. But staff member A, who made the computer note, has left. The hearsay rule would mean that a current staff member (staff member B) could not produce the note. The business record exception would allow staff member B to produce the note. That is the purpose of the business record exception.

Section 19 says that hearsay statements contained in business records are admissible in three situations:

(a) the person who supplied the information is "unavailable" (see the definition of "unavailable" in section 16)
(b) the judge considers that no useful purpose would be served by requiring that person to be a witness
(c) the judge considers that undue expense or delay would be caused by requiring that person to be a witness

Hearsay notices (section 22)

In a criminal case, if any party wishes to produce hearsay evidence (and the Ministry often does), then that party must serve on the other parties a formal notice stating what hearsay evidence will be produced, and how it is admissible.

The notice must state (depending on which exception applies):

- The intention to offer the hearsay statement in evidence
- The name of the maker of the statement if known
- The contents of the statement, if made orally
- The circumstances relating to the statement providing reasonable assurance it is reliable
- Why the document is a business record
- Why the person is unavailable as a witness
- Why undue expense or delay would be caused if the person had to be a witness

Presently it is the responsibility of Legal Services to prepare hearsay notices, however, the relevant solicitor is reliant on the investigator to provide the information required.

TRIAL PROCESS

Who to call as witnesses

The first step is to check what charges have been laid, and the wording of each charge, to ensure that you are producing evidence for everything you need to prove.

External Witnesses

All people who have made statements that tend to prove your case need to be called as witnesses. Their earlier statements are not able to be produced by the investigator (because of the hearsay rule).

Internal Witnesses

In many cases a client may have interacted with numerous Work and Income staff members. It is not always necessary to call every person they have had interaction with.

The evidence to be produced by the Ministry can sometimes be given by one or two witnesses, depending on the nature of the evidence.

In most cases all of the Ministry evidence might be given by one case manager. Some exceptions to this would apply :-

- If the investigator was recently a case manager, then the investigator may be able to give all the Ministry evidence.
- If the records show a particularly important interaction between the client and particular case manager(s), then it is advisable to call those case manager(s) as well.
- If some evidence is specialist in nature, such as the data matching process, you will need to call a person who works in that area.
- If the evidence relates to a particular and specialist piece of work, such as the results of a phone call search, the person who did the search will need to be called.

At all times ask yourself whether your witness will be able to answer questions about the evidence they are giving. If possible, call the person(s) who actually dealt with the client's affairs. If in doubt, seek legal advice.

Evidence from finance companies, hospitals, power companies and so on can hopefully all be presented by one witness from each institution.

Admission by consent (section 9)

The judge can admit any evidence that all the parties agree can be admitted. That means that if all the parties agree, evidence can be admitted that:

- is not admissible, or
- is not in an admissible form

It is this section that makes it possible for witness's briefs to be handed up instead of the witness having to be there.

Best evidence

It used to be that the best evidence had to be presented otherwise it could not be admissible. For example, the original of a tenancy agreement had to be produced, not a copy. The best evidence rule has not been carried forward into the Evidence Act 2006. Now it is more likely that all relevant evidence will be admitted, though the weight attached to it will vary accordingly to the type of evidence. Generally the production of copies of documents will be allowed if the originals are lost, or destroyed.

However, it cannot be assumed that this will happen, and you can expect judges to become grumpy if a case involves the production of lots of photocopied documents with their being no indication of efforts having been made to obtain the originals. You should always endeavor to obtain the originals of exhibits, and if copies need to be produced, the brief of the witness should say what has happened to the original.

Producing a document without a witness (section 130)

It is possible to produce a document without having to bring a witness to court to produce the document. The party wishing to do this needs to serve the other parties with notice of their intention to do that, and the other parties can formally object.

This procedure is useful for a document that speaks for itself, where there is no need for a witness to provide any explanation for it, such as bank statements.

The document must be otherwise admissible. That means it must not contain hearsay, opinions, previous consistent statements and so on.

Public documents (section 138)

A public document obtained by the Ministry can be produced as an exhibit by the investigator.

The definition of "public document" is very wide, and amounts to any document held by the government or a public body. However it must be officially sealed or stamped or it can be a certified copy.

Witness referring to documents (section 90)

When you are talking to your witnesses about what to expect at the hearing, it is important to make them aware of the rule in section 90.

The rule is that a witness (when they are in the witness box) can not look at any document unless the judge grants permission. The legal term for permission is "leave".

Section 90 clarifies that a witness can look at a document to refresh his or her memory, if the document was made when their memory was fresh. However even in that situation, the judge still needs to grant leave.

Because of this rule, witnesses should be encouraged to familiarize themselves with any documentary records they have before they enter the courtroom.

It is reasonably common for witnesses to give their evidence by reading from a brief of evidence, and then being cross examined. However that process can only be followed when the defence consents to it under section 9. Until that consent is given, you and the witness must assume that they will have to give evidence according to the rules.

TEST

1. A witness can give evidence of their opinion in what two situations?

   (a) _____

   (b) _____

2. A prosecution witness can not produce in court the witness statement they gave during the investigation because of what rule?

   _____

3. A public document is admissible if it has been properly verified. What are the three ways to verify a public document?

   (a) _____
   (b) _____
   (c) _____

4. A piece of evidence is hearsay if it is what 3 things?

   (a) _____

   (b) _____

   (c) _____

5. Name the two exceptions to the hearsay rule

   (a) _____

   (b) _____

6. In a joint prosecution of a husband and wife, the statement made by the wife can be used against both of them – true or false?

   _____

ANSWERS

1. A witness can give evidence of their opinion in what two situations?

   (a) It is necessary to do that for the judge to understand what they saw, heard or perceived

   (b) The witness is an expert

2. A prosecution witness can not produce in court the witness statement they gave during the investigation because of what rule?

   The previous consistent statement rule

3. A public document is admissible if it has been properly verified. What are the three ways to verify a public document?

   (a) Sealed
   (b) Stamped
   (c) Certified copy

4. A piece of evidence is hearsay if it is what 3 things?

   (a) An assertion

   (b) Made by somebody who is not a witness

   (c) Offered in evidence to prove the truth of its contents

5. Name the two exceptions to the hearsay rule

   (a) General exception

   (b) Business record exception

6. In a joint prosecution of a husband and wife, the statement made by the wife can be used against both of them – true or false?

   False. Under section 27 the statement is only admissible against her.

CONGRATULATIONS!!

You have now finished the **Evidence Module**

NEXT MODULE:

PROSECUTION