

IN THE MATTER OF THE INQUIRIES ACT 2005
AND IN THE MATTER OF THE INQUIRY RULES 2006

THE UNDERCOVER POLICING INQUIRY

[OPEN] SUPPLEMENTAL APPLICATION ON BEHALF OF N123
FOR RESTRICTION ORDERS

Introduction

1. The Inquiry has been provided with the following documents in support of the restriction order applications made by N123 in 2016: (i) Closed and Open applications drafted by S&G LLP dated 14 March 2016; (ii) MPS risk assessment dated 8 February 2016; (iii) personal statement of N123 dated 18 February 2016; (iv) gisted personal statement [undated]; (v) draft order; (vi) additional closed statement of N123 dated 16 May 2016 provided under cover of S&G LLP letter of 24 May 2016; (viii) closed statement of N123P dated 16 May 2016 also provided under cover of S&G LLP letter of 24 May 2016; (ix) medical reports [redacted] referred to in the letter of 24 May 2016 from S&G LLP, but supplied on 1 June 2016.
2. This document is intended to revise and supplement N123's existing application for restriction orders in two ways: *first*, by withdrawing certain personal information from the application; and *second*, by reference to the risk assessment prepared by Marc Veljovic dated 30 June 2017.
3. N123 maintains *his/her* application for the restriction orders sought in *his/her* original closed and open applications as set out in the draft order originally submitted.

The new risk assessment

4. The latest risk assessment provides a much more thorough and comprehensive analysis of the likelihood of jigsaw identification, the risk of physical attack and interference with N123’s private and family life. The assessment of risk is appreciably higher than in previous risk assessments. No admission is made by N123 as to the accuracy of those factual matters set out in the risk assessment upon which the assessment is based.

Revisions to the existing application

5. N123 no longer wishes to rely on the following material previously filed in support of *his/her* application for restriction orders:

[REDACTED]

[REDACTED]

[REDACTED]

6. It follows that N123 does not rely on this material for the purposes of *his/her* application, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. Additionally, N123 wishes to amend paragraph 6 of *his/her* written application dated 14 March 2016 in both its open and closed formats. This part of *his/her* application should now read as follows: “N123 has not been officially confirmed by the MPS or any other relevant body or court as being an undercover police officer”.

Conclusion

8. N123's application for the measures sought in the draft order is maintained.

SLATER & GORDON LLP

20th July 2017