


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 N58
FOR RESTRICTION ORDERS

Introduction

1. The Inquiry has been provided with the following documents in support of the restriction order applications made by N58 in 2016: (i) Closed and Open applications drafted by S&G LLP dated 19 February and 11 March 2016; (ii) MPS risk assessment dated 1 February 2016; (iii) personal statement of N58 dated 17 February 2016; (iv) gisted personal statement [undated]; (v) draft order; (vi) letter of S&G LLP dated 24 May 2016 setting out a proposal as to how N58's evidence might be received.
2. This document is intended to supplement the existing application for restriction orders in light of two additional documents which are filed in support of N58's existing application for restriction orders: (i) the risk assessment prepared by David Reid dated 25 May 2017; (ii) the psychiatric report prepared by Professor Fox dated 18 January 2017.
3. This document organises the information contained in the two documents mentioned above and makes limited submissions on the basis of that information. It is not intended as a skeleton argument.
4. N58 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 

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

7. *Second*, we have received and considered with N58 the latest risk assessment, in particular paragraphs 10.4 and 16.2. The risk assessor makes a compelling case for the

near impossibility of maintaining a 'sterile corridor' [REDACTED]
[REDACTED]
[REDACTED].

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
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[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

10. For these [REDACTED] reasons, N58 wishes to maintain *his/her* original application and asks for a restriction order in the terms set out in the draft order provided in 2016.

Article 3 - risk of physical assault

11. The latest risk assessment serves to underline the real and ongoing threat [REDACTED]
[REDACTED]

[REDACTED]
[REDACTED]

[REDACTED] It is of note that the latest risk assessment escalates the risk from low (as it was in the 1 February 2016 risk assessment) to medium in ¶ 16.2 (iii). N58 has always maintained that the risk of physical retribution is real, for the reasons given in *his/her* personal statement.

Article 3 - risk of psychological harm

12. For obvious reasons, this topic is not covered in the latest risk assessment. A report has been obtained from Professor Fox, dated 18 January 2017. The contents of the report are self-evident. [REDACTED]
[REDACTED]

Article 8 - private and family life

13. N58 relies on evidence previously submitted and the assessment contained in the latest risk assessment at paragraphs 16.2 (iv) to (vi).

Conclusion

14. N58's application for the measures sought in the draft order is maintained and enhanced by the most recent material provided to the Inquiry.

SLATER & GORDON LLP

13th July 2017

