IN THE MATTER OF THE UNDERCOVER POLICING INQUIRY

NPSCPs' SUBMISSIONS

RE THE CHAIRMAN'S MINDED TO POSITION ON

HN23, HN40, HN241, HN322 & HN348

INTRODUCTION

1. These submissions are served in response to the Chairman's indications of the restriction orders he is minded to make in relation to HN23, HN40, HN241, HN322 and HN348, set out in his second minded to note dated 14 November 2017.

HN23

2. The Chairman is minded to grant restriction of HN23's real and cover names on the basis that "[t]he nature of the deployment gave rise to risks to HN23's life and safety which, to an extent which cannot be precisely quantified, remain." The Chairman concludes that "[n]othing short of anonymity in respect of real and cover name could obviate the risks." And that "[i]t is unavoidable that the evidence which HN23 can give will be given in closed session."[1] In response to a request from the NPSCPs for clarification as to the legal basis on which the Chairman is minded to grant the restriction order, the Inquiry has clarified that "the legal basis of the minded to decision is made on Article 8 grounds, specifically a risk of physical harm."[2]

3. The minded to note does not address any of the public interest factors telling in favour of disclosure of this officer's cover and/or real name. It is not, therefore, possible to know whether these have been taken into account, but have been found to be outweighed by the risk of harm, or whether the Chairman has wrongly left

[1] Minded to note 3, dated 14 November 2017, para. 8.

[2] Email from Catherine Turtle to the NPSCP RLR group, 18 January 2018.

some or all of these interests out of account, as it is contended he has done in other cases where more is in the public domain, for example in relation to HN58.

4. It is submitted that the Inquiry has failed to make reasonable disclosure in relation to this officer's application for restriction of his/her cover and real names. The level of redaction of the supporting material is excessive and is such as to make it impossible for the NPSCPs – and the public - to assess the legitimacy, or otherwise, of the balance the Chairman is minded to strike. It would be one thing if this lack of transparency was driven by necessity - i.e. if it were impossible for the Inquiry to make greater disclosure of the factors material to the proper determination of the application without undermining its purpose – but that is not the case here. The NPSCP RLR group has written to the Inquiry with a list of requests for information that would enable them (and the public) to understand, at least the parameters of the balance the Chairman is minded to strike in this case[3]. This information was carefully framed so as to ensure that it could not, on any reasonable view, be said to disclose, or risk leading to the disclosure of, HN23's real or cover names, and therefore fall foul of Rule 12 of the Inquiry Rules 2006. But save for answering the request to be told the legal basis for the minded to position, the requests were refused. It is submitted that this is unreasonable and contrary to the presumption of openness in the Inquiry's process confirmed by the previous Chairman in his legal principles ruling of 3 May 2016. Unnecessary and unjustified lack of transparency undermines public confidence in these critically important anonymity decisions and detracts from the Inquiry's over-arching purpose of allaying public concern.

5. The request for disclosure of the following information in relation to HN23 is repeated:

   a. disclosure of the broad category of the group(s) HN23 was deployed against and reported on – e.g. 'far right' or by reference to the CP categories.

   b. confirmation as to whether any of the groups HN23 had connections with whilst undercover have been granted CP status in the Inquiry.

[3] Email from Tamsin Allen to the Inquiry on behalf of the NPSCP RLR group dated 17 January 2018.

c. further information in relation to the misconduct investigation in relation to this officer. In particular, was the alleged misconduct related in any way to his/her undercover deployment; or to any other role of relevance to the Inquiry? Was the nature of the misconduct alleged relevant to any issues the Inquiry is tasked with investigating?

d. is HN23 referred to (other than as "HN23" or "N23") in any of the reports published by the Ellison Review or Operation Herne, or in the IPCC report "Ellison Review – Walton, Lambert and Black".

e. what is the broad area of HN23's current employment, which is said to be affected were his/her real or cover name to be released? For example, public life, policing, private security/ corporate intelligence?

f. any factor(s) which increase(s) the public interest in disclosure of HN23's real and/or cover name, for example, but not limited to, an allegation or suspicion of intimate personal relationships whilst undercover; infiltration[4] of justice campaigns including, but not limited to, the Lawrence family campaign; passing on of legally privileged information; prosecution in undercover identity; passing information to black listing companies; career in private security / corporate intelligence post UCO career.

6. Disclosure of this information is essential to enable the NPSCPs (and other CPs and the media, in its important role as scrutineer of both a public inquiry and public services, such as the police) to make properly informed submissions in respect of HN23's application and for them, and the public, to have confidence that the Chairman has had proper regard to the public interests telling in favour of disclosure, as well as those telling against, and that he has struck a reasonable balance. None of the requested information falls foul of Rule 12 of the Inquiry Rules or would otherwise be unlawful to disclose. The NPSCP RLR group repeat their request for disclosure of it.

Submissions in the absence of disclosure

[4] NB the reference to "infiltration" is intended to include any gathering of evidence/intelligence – i.e. cases in which the MPS maintain that intrusion was "collateral" as well as those where targeting is accepted.

7. In the absence of proper disclosure, the NPSCPs are limited in the submissions they are able to make. The following points are made without prejudice to any additional or distinct submissions they might make once proper disclosure has been received.

Risk

8. It is of note that the Chairman is minded to grant HN23's application on the basis of Article 8 and not Articles 2 or 3. This indicates that the risk of harm is not such as to cross the Article 2 or 3 threshold. In those circumstances, the risk "falls to be assessed simply as one of a number of factors in an even-handed evaluation of competing interests rather than as a matter which requires to be offset by compelling justification."[5] The Chairman's minded to reasoning gives no indication that any of the competing interests telling against restriction have been evaluated in this case.

Disclosure of cover name leading to identification of real name

9. The disclosure of a cover name can only put an officer at risk if it is liable to lead to disclosure of the real name of the officer so that he can be tracked down. It is asserted that this is the likely consequence of disclosure of HN23's cover name. No disclosure whatever is made in relation to this. Yet, the officer himself states at paragraph 31 of his witness statement that he does not use any form of social media and has actively avoided being on it as a consequence of his role within the SDS. Given that this officer has himself taken great care to avoid the mosaic effect, the conclusion of the MPS risk assessor that the risk to him would be critical if his cover name were revealed is very surprising. The only information disclosed is at 13.4 of the risk assessment namely that the risk assessor has focused on open source material to establish the current internet profile of HN23 and also to establish any link between the cover name and the true identify of HN23.

[5] Kerr LCJ, Re A and others' Application for Judicial Review (Nelson Witnesses) [2009] NICA 6 at paragraph 24 of Kerr LCJ's judgment, see also Kerr LCJ at paragraph 38 and Higgins LJ at paragraph 11 of his judgment in the same case.

10. There can be no reason why disclosure cannot be made (with suitable redactions if necessary) of the assessment of the likelihood that disclosure of the cover name will lead to disclosure of the real name and/or the ability to track HN23 down. This can plainly be done without revealing or risking revealing either identity. The strength and accuracy of this evidence is critical to the determination whether disclosure of the cover name should be made. For the reasons set out below, disclosure of the cover name is vital to the discharge by the Inquiry of its functions. Furthermore, it is clear from the Chairman's different assessment of the gravity of the risk of disclosure from that of the police, i.e. Article 8 not 2 or 3, that there is a question as to the accuracy of the MPS risk assessment in this case. This makes even more compelling the need for disclosure so that the evidential basis can be properly identified and tested.

The interests telling against restriction

11. The strong public interests in disclosure of <u>all</u> former SDS (and NPOIU) UCOs' real and cover names are addressed in the submissions served on behalf of the NPSCPs dated 5 October 2017 and those in relation to HN58 dated 18 January 2018; see also the third witness statement of Donal O'Driscol dated 18 January 2018. Those submissions, and the points made in Mr O'Driscol's statement, are adopted here. The NPSCPs' ability to identify the additional <u>particular</u> public interests which make disclosure of this officer's real and/or cover names of special importance is severely curtailed by the lack of disclosure. Hence the imperative for the Inquiry to identify publicly any such interests in order that the NPSCPs – and the public – can know that these have been properly taken into account. The following points can, however, be made.

12. <u>The time period of this officer's deployment.</u> HN23 was deployed in the 1990s. This is a time-frame of particular interest to the Inquiry – and the public – given that it was the period during which Bob Lambert and HN58 held managerial roles; during which Jim Boyling and Mark Jenner engaged in deceitful relationships; and HN81 reported on the Lawrence family campaign. Given the concerns about the conduct

of the SDS generally during this period, there is a particular importance in investigating all of the deployments that took place at that time. Without disclosure of cover names the investigation will be one-sided and of limited value. Further, given the time-frame of this officer's deployment, it is likely that he over-lapped with Peter Francis. In which case, the problem acknowledged by the previous Chairman in relation to the evidence of Peter Francis also arises:

> "… Mr Emmerson QC pointed to exigencies that would arise if Mr Francis were to give evidence in open proceedings, as he would unless his evidence was made the subject of a restriction order on the application of the police services. He would be giving evidence about practices that he regarded as unethical or unlawful. He would be covering the same or similar territory as that which the Metropolitan Police Service argued should be covered in private by other officers. If Mr Francis' evidence about these matters were to be disputed, counsel would be unable to put to Mr Francis at an open hearing that which had been or would be said about his evidence in a closed hearing. Mr Francis' evidence would be untested save by contradictory evidence given in closed proceedings. Mr Emmerson QC argued that if the Inquiry was to prefer the evidence of Mr Francis the inevitable inference would be that Mr Francis' evidence had not been reliably contradicted. In that event the purpose of a restriction order in respect of other officers would be defeated. If, on the contrary, the Inquiry was to accept the evidence given in a closed hearing and reject the evidence given by Mr Francis in an open hearing, the Inquiry would be required to explain its decision by reference to evidence it could not disclose. The only evidence publicly available would be the evidence of Mr Francis and the Inquiry would face some difficulty in explaining the reasons for its decision without disclosing at least part of the evidence heard in a closed session.[6]

13. It is difficult to see how the Inquiry could allay public concern about the serious issues raised by Mr Francis if it is limited to asking the public to take its conclusions on trust, based on evidence from anonymous witnesses, that the public has not heard, because those giving it are not prepared to testify publicly, notwithstanding that Mr Francis has done so openly and without harm.

14. For these reasons there is a particularly strong public interest in disclosure of HN23's cover name in order that his deployment can properly be investigated, with evidence

[6] Legal principles ruling 3 May 2016 paragraph 56.

from those on whom s/he spied and the Inquiry will be able properly to explain its conclusions in respect of any conflict of evidence between HN23 and Peter Francis.

15. Further, the reference to HN23 having previously been the subject of a misconduct investigation is noted. In the absence of disclosure, it is not possible to know whether the alleged misconduct is in any way connected with or relevant to the matters this Inquiry is tasked with investigating. This is one of the matters about which disclosure has been requested – not of details that could lead to the officer's identification – but at least an indication as to the relevance of the allegation to the subject matter of the Inquiry, and therefore an indication as to whether it is a factor that has, or should have been, weighed in the balance against restriction.

HN40

16. The same issues of lack of disclosure and inadequate explanation in the minded to decision arise in relation to HN40 as are set out above in relation to HN23. As with HN23, the NPSCP RLR group have written to the Inquiry requesting further information about HN40's application that is essential to an understanding of whether the Chairman has properly considered the public interest factors telling against restriction in this case, but which could not reasonably be said to risk undermining the purpose of the application, or to be otherwise unlawful to disclose. This request has been refused. Renewed request has been made here for disclosure of the following. Please note that the request at e. below has been developed since the NPSCP RLR email request of XX January 2018:

    a. the broad category of the group(s) HN40 was deployed against and reported on – e.g. 'far right' or by reference to the CP categories.

    b. confirmation as to whether any of the groups HN40 had connections with whilst undercover have been granted CP status in the Inquiry.

    c. it is noted that HN40 is referred to in the second Operation Herne report in the context of identification of subjects and/or suspects[7]. Please indicate whether any identifications made by HN40 during or in connection with his

[7] Herne 2 p.42 & p.65, the latter in connection with the identification of Duwayne Brooks in connection with public disorder at the Welling bookshop in May 1993.

undercover deployment resulted in the prosecution of those identified. Please also indicate whether any identifications made by HN40 during or in connection with his undercover deployment resulted in any arrests and/or prosecutions which subsequently resulted in successful civil actions against the MPS e.g. for false imprisonment / malicious prosecution. Please indicate whether there is anything to suggest that HN40 was, or may have been, involved in the identification of Duwayne Brooks in connection with public disorder in Welling in May 1993.

d. is HN40 referred to (other than as "HN40" or "N40") in any of the reports published by the Ellison Review or Operation Herne, or in the IPCC report "Ellison Review – Walton, Lambert and Black".

e. it is noted that HN40 was prosecuted in his/her cover name, please inform us of the outcome of that prosecution – i.e. whether HN40 pleaded guilty; was found guilty after trial; was acquitted after trial; the case against him/her was dropped and, if so, at what stage of the proceedings etc. Please state whether HN40 was privy to any information that was subject, or may or should have been subject, to legal privilege on the part of a third party. Please also state whether the cases of any co-defendants / others prosecuted as a consequence of the same incident will be referred to the panel set up to investigate potential miscarriages of justice. Please also state what steps will be taken by the Inquiry to investigate the role played by HN40 in the events that led to his/her prosecution or the prosecution of others.

f. please identify any other factor(s) which increase(s) the public interest in disclosure of HN40's real and/or cover name, for example, but not limited to, an allegation or suspicion of intimate personal relationships whilst undercover; infiltration[8] of justice campaigns, including, but not limited to, the Lawrence family campaign; passing on of legally privileged information; passing information to black listing companies; career in private security / corporate intelligence post UCO career.

[8] See footnote 4 above.

Submissions in the absence of disclosure

17. As with HN23, these submissions are made without prejudice to any additional or distinct submissions they might make once proper disclosure has been received.

Risk

18. As with HN23, the Chairman is minded to grant HN40's application on the basis of Article 8 and not Articles 2 or 3. The submissions set out at paragraph 8above are repeated. It is noted that the risk assessment assesses the risk to HN40 of physical attack in the event of his/her cover and/or real name being disclosed as 'medium'[9]. This cannot properly be treated as an automatic bar to disclosure. The Chairman himself has recognised that there may be public interests telling in favour of disclosure which outweigh even a 'high' risk of physical harm, as is demonstrated by the refusal of a restriction order in relation to HN15. This serves to highlight the importance of ensuring that the public interests in favour of disclosure have been properly identified and taken into account.

Disclosure of cover name leading to identification of real name

19. At section 18 of the risk assessment it is stated that disclosure of the cover name will in the view of the assessor trigger a research of times, places and events that will involve the research and review of images that will in time secure a visual image of HN40 and that further research will eventually lead to the risk of his true identity being revealed. We repeat the observations made above at para **9.** It is again submitted that disclosure should be made, without revealing anything that will lead to the disclosure of the cover and/or real name, of the research conducted on the mosaic effect, revealing the steps taken and the results.

The interests telling against restriction

20. As with HN23, the generic public interests telling in favour of disclosure of the cover and real names of all SDS and NPOIU officers apply in relation to this officer. In addition, the NPSCPs point to the following particular interests in respect of HN40.

[9] Risk assessment p.7.

21. Time period: the minded to note indicates that HN40 was deployed during the last decade of the existence of the SDS – so between 1998-2008. Again, as with the period of HN23's deployment, this was a significant period in terms of the allegations that have given rise to the Inquiry and to the extent that HN40 will give evidence in relation to matters raised by Peter Francis, the same issues will arise as are identified at paragraphs 12 and 13 above .

22. Potential miscarriages of justice: the gisted risk assessment in relation to HN40 discloses that s/he was prosecuted in his/her cover name. This raises the question of manipulation of the criminal justice process and potentially abuse of legal privilege. Given what is known about the actions of other undercover officers (e.g. Mark Kennedy) questions arise, not only in relation to material non-disclosure during the criminal trial, but also to the possibility of agent provocateur on the part of the officer. Investigation of the latter, in particular, is impossible without disclosure of the cover name so that those affected can give their account of events. This is a very strong public interest in favour of disclosure, and one which has repeatedly been found to outweigh protection of the identity of an informant: Marks v Beyfus (1890) 25 QBD 494; R v Agar (1990) 90 Cr App R 318; DIL v CPM 2014 EWHC 2184 [26] & [27]. It is of some real concern that this factor is not addressed at all in the Chairman's minded to note. The minded to position is likely to be unlawful on this basis alone.

23. It is further noted that the reference to the prosecution of HN40 in his/her undercover identity is not the only matter raising concerns about miscarriages of justice in connection with this officer. The second Operation Herne report contains references to this officer in connection with the identification of suspects, including in the context of the discussion of the identification of Duwayne Brooks at Welling in 1993. It is not clear from the Herne report whether HN40 was him/herself directly involved in the process which led to the identification of Mr Brooks, or whether s/he was simply commenting on it. These are matters about which further disclosure has been requested, as set out at 16c above. To the extent that HN40 was involved

whilst working for the SDS in identifications which led to arrests and/or prosecutions, this falls to be investigated. In order for such investigation to be meaningful, the Inquiry must hear from those affected. That requires disclosure of the cover name. The fact that HN40 co-operated with Operation Herne suggests that s/he has relevant evidence to give. It is of equal importance that the Inquiry hears from those who are able to speak to the 'other side' of this officer's deployment.

HN241

24. The Chairman is minded to restrict HN241's cover and real names. This is on the basis that publication of the real name is said to give risk to a 'low' risk to HN241's physical safety. This position is unsustainable. On the "definition of terms" at Appendix D to the risk assessments, 'low' risk is defined as "the probability of the risk occurring is considered unlikely." A risk that is unlikely to occur does not constitute an interference with the right to respect for private life protected under Article 8. And as such, the presumption in favour of openness in the Inquiry's proceedings applies and the real name should be disclosed.

25. Of even greater concern is Chairman's reasoning from the (flawed) justification for restriction of the real name to purported justification for restriction of the cover name. I.e. having identified a low risk of harm arising from publication of the real name, the Chairman finds there to be "a real, but unquantifiable, risk that if the cover name were to be published, the real name could be identified" and from there concludes that the cover name too must be restricted.

26. It is submitted that an unquantifiable risk of unlikely harm cannot possibly be a proper basis for restricting a cover name and the Chairman is wrongly allowing the excessively low threshold for restriction of a real name to taint the proper consideration of disclosure of the cover name.

27. It is clear from this and previous anonymity decisions that the Chairman is (wrongly, it is submitted) operating such a low threshold for restriction of real names that it is

in reality a presumption against disclosure, save in the cases of managers / senior officers and those who engaged in wrong-doing, in particular intimate relationships. It would be quite wrong, therefore, to reason from restriction of a real name on such a low threshold to restriction of a cover name. This would wrongly exclude from consideration the instrumental importance of disclosure of the cover name. In any case where it is assessed that disclosure of the cover name is likely to lead to disclosure of the real name, the public interest in favour of disclosure of the cover name must be given proper weight.

28. In the present case, the level of risk of physical harm assessed as arising in the event of disclosure of HN241's cover name is "very low"[10] – i.e. "highly improbable"[11]. This is reinforced by the fact that this officer's cover appears to have been blown at least once already[12]. It is, with respect, irrational for a "highly improbable" risk of harm to be found to outweigh the public interest in disclosure of a cover name, given that the consequence is that the officer's undercover deployment cannot properly be investigated.

29. As previously submitted in relation to HN58, it is wrong to place any weight on the absence of known allegation against an officer whose cover name has not been disclosed. Disclosure of the cover name is a critical factor in enabling such evidence to emerge. Further, there is no proper basis for the Chairman's view that it is unlikely that the publication of the cover name would prompt any evidence from a non-state source which would assist the Inquiry to fulfil its terms of reference. Unless or until a cover name is released, so that those who were spied upon are able to know that this was the case and therefore have the opportunity to come forward, it is impossible for the Inquiry to conclude that there is no such evidence to be had. Further, it would be wholly wrong for the Chairman to conclude that because this officer's deployment took place in the early 1970s, those s/he targeted have less interest in knowing the truth about that period of their lives than a person who was

[10] Risk assessment 16.2 p.7.

[11] Appendix D – Definition of Terms.

[12] Statement of HN241 paragraph 16.

targeted more recently. Applications have been made for CP status by those who believe themselves to have been the victims of undercover policing from all periods within the Inquiry's remit, including from the very start of the SDS/SOS.

30. There is a clear public interest in disclosure of cover names, including this one. That public interest is not outweighed by a "highly improbable" risk of harm.

HN322

31. The Chairman is minded to restrict this officer's real name on the basis that publication of it would "serve no useful purpose" and that the "interference which it would occasion with his right to respect for his private life would not be justified". Both parts of this reasoning are wrong.

32. First, disclosure of HN322's real name would serve the useful purposes identified at paragraph 108 of the NPSCPs' submissions of 5 October 2017. The NPSCPs highlight, in particular, the submission made at [108a.] of those submissions as to the utility of the Inquiry publishing photographs of officers from the time of their deployment in order to enable those on whom they spied to recognise them and therefore to come forward with relevant evidence. In a case such as HN322's, where it is said that there was no cover name, publication of such images is likely to be the only means by which the Inquiry is able to obtain non-police evidence in relation to this officer. It is appreciated that HN322 maintains that he was not in fact deployed at all. However, his memory is vague on this issue and it is at least possible that were his image from the time to be published this would prompt relevant evidence, in the same way that disclosure of cover names is recognised to do. If the Inquiry were to restrict disclosure of HN322's real name in terms similar to those included in the real name restriction orders granted to date it is arguable that this would also prohibit the Inquiry from publishing images from the time of deployment. In those circumstances restriction of the real name would have a direct impact on a measure of instrumental value to the Inquiry's gathering of evidence. The NPSCPs have already written to the Inquiry about this and it is understood that the Chairman has agreed to hear oral submissions in relation to it at the 5 February 2018 hearing.

Further, it is submitted that there is a particular interest in proper investigation of instances of deployment against groups with an international dimension (here the Vietnam Solidarity Campaign) as such deployments may raise issues about the nature of the information gathered and who it was shared with.

33. Secondly, in relation to the Chairman's assessment that any adverse consequences for this officer arising out of publication of his real name would be such as to constitute an interference with his Article 8 rights, reference is made to the submissions set out at paragraphs 96-100 of the 5 October 2017 submissions served on behalf of the NPSCPs. The risk of physical harm to this officer from disclosure of his real name is assessed by the MPS as "very low" (i.e. "highly improbable") and the risk of interference with his private life is assessed as "low" (i.e. unlikely). There is no proper basis for a finding of interference with this officer's private life rights in the event of his real name being disclosed and in those circumstances there is no proper basis for restriction. Further, it is noted that HN322 declined to be interviewed for the purposes of the risk assessment. As a matter of principle, the Inquiry must consider whether steps other than anonymity could be taken to obviate any risk to an officer and his/her refusal to engage in the risk assessment process must not be a means of avoiding consideration of such alternatives.

HN348

34. Similar considerations arise in respect of this officer as in relation to HN322 above, save that HN348 does accept that she was deployed undercover and thinks that she can remember part of her cover name, which has been disclosed. As with HN322 there is absolutely no suggestion that this officer is at any risk of physical harm whatsoever from disclosure of her real name. As Guardian News and Media Limited point out in their submissions in relation to this officer: she was deployed against an entirely peaceful organisation (a maoist faction of the women's liberation front) and there must be real questions about the proportionality (and therefore lawfulness) of subjecting those spied on by her to intrusive covert surveillance. There is therefore a clear public interest in the Inquiry obtaining evidence from those affected by HN348's deployment in order to ascertain its scope and effect on them. Given the

passage of time and the uncertainty over the cover name, publication of photographs from the time of HN348's deployment are likely to be an important means of the Inquiry obtaining such evidence. There is therefore a clear instrumental reason for not restricting this officer's real name.

35. The reasons advanced in favour of restriction: a desire for current colleagues not to know of her past; concerns about the impact on a vulnerable family member and embarrassment should one of the individuals she spied upon learn of her status as an undercover officer are not sufficient reasons for granting restriction and do not cross the necessary level of seriousness required to constitute an Article 8 interference, particularly given that she was at the time discharging duties as a public officer. It is of note in relation to the officer's family member that s/he is already fully aware of the officer's status as an undercover officer.

CONCLUSION

36. For all of the reasons set out above, it is submitted that the minded to positions taken by the Chairman in relation to each of these officer are wrong. In relation to HN23 and HN40, insufficient disclosure has been made to enable NPSCPs (and the public) to have confidence that important public interests telling in favour of disclosure have been taken into account. In respect of HN241, HN322 and HN348, it is submitted that the Chairman's minded to positions are unsustainable for the reasons given and that the restriction order applications in respect of each of these officers should be refused.

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22 January 2018