

IN THE UNDERCOVER POLICING INQUIRY

**WRITTEN OPENING STATEMENT ON BEHALF
OF
'Alison', 'Bea', 'C', 'Ellie', Denise Fuller,
Donna, Belinda Harvey, 'Jane', 'Jenny',
'Jessica', 'Lisa', 'Lizzie', 'Maya',
'Monica', 'Naomi', 'Rosa', 'Ruth',
'Sara', Helen Steel, 'Wendy', Kate
Wilson**

INTRODUCTION

1. This statement is made on behalf of eighteen women who were deceived into long-term intimate sexual relationships with undercover police officers ['UCOs'], two women who were deceived into long-term close friendships which became sexual on one or more occasions; and one woman deceived into a close long-term friendship. Together they are hereafter referred to as 'the women'. The earliest of these relationships began in 1985, the most recent ended in 2015.
2. These are not the only women who have been deceived into such relationships. There are now more than 30 women who know that they were deceived into such relationships by undercover police officers spying on campaign groups. Other women are represented separately in the Inquiry. At least one of those relationships (that of 'Mary' and 'Rick Gibson') dates back to 1975.
3. It is very likely that there are other women who are yet to discover that they are affected. The Inquiry has already led to a number of women, including 6 of those on whose behalf this statement is made, discovering that relationships which they had always believed to have been significant and genuine, were in fact police infiltrations. There may be many other women in the same position who do not yet know. The

extensive anonymity granted by the Inquiry to officers, including of their cover names, means that these women will continue to be denied the truth and thereby prevented from giving relevant evidence, so hampering the ability of the Inquiry to get to the truth about the frequency, nature and scale of these abuses.

4. Some of these relationships have led to children being born; others have deprived the woman involved of the opportunity to have children, because she has spent her child-bearing years in love with a man who despite proclaiming his desire to have a child with her, never had any intention of doing so (frequently because he was married and had children in his 'real life'). Many of the women have had significant and long lasting difficulties with subsequent relationships, because genuine partners have been compared with the idealised relationship constructed by the undercover officer, and/or because their ability to trust has been completely shattered. Careers and life choices have been derailed. All of the women, on discovering the truth, have had their personal histories, their sense of self and their ability to trust destroyed.
5. For those women who did have children fathered by undercover officers the additional torment is immeasurable. Their children are the focus of their overwhelming love and protective instincts, yet at the same time their circumstances are an indelible reminder of the cruel deception practised on them. For them, there is no prospect of escape or closure even if the officers do not seek access to or rights over the children born of the relationship. If they do, those officers will continue to intrude into their lives practically as well as psychologically. Recognition must be given to the harm done to children born into and trapped in these state-engineered relationships. There are children yet to receive an apology from the Met.
6. Most of the women who were deceived were involved to some degree with political or campaigning activity challenging oppression and injustice and seeking a better, more sustainable world. Such political freedom of speech and protest is the bedrock of democratic societies across the world, protected by both international and domestic law. Some of the women were not themselves political, but happened to be useful to officers giving them 'cover' to gain entry to, or maintain ties with, political groups with whom the woman had friendships. To the extent that there was any

legitimate policing interest at all in the groups with which the women were involved, it is out of all proportion to the devastation inflicted by the infiltration of their bodies, emotional lives, families and homes. These relationships amounted to the most serious violations of the women's human rights, including their rights to privacy, to freedom of expression and association and most significantly, their right not to be subject to inhuman and degrading treatment, a right which is absolute. No matter what accusations were being levelled at either the groups the officers were targeting or even the women themselves, there was, and could be, no lawful excuse for such seriously abusive relationships.

7. These relationships were driven by institutional sexism reflecting the deeply sexist attitudes pervading the police in general and the undercover units in particular. Such attitudes, founded on a lack of respect for women's autonomy, resulted in the use of women as mere objects, as props to shore up the fake identities of the officers. The proportion of women used as objects in this way hugely outnumbered the men. And women were inevitably at risk of suffering so much more than men. Only women could fall pregnant and give birth to the child of an officer. Only women could lose their child bearing years to the manipulations of the State. That sexism was also displayed by the assumption that it was acceptable to hide the relationships from the wives of the officers, with no consideration given to the impact on them of that deception and the harm caused to their families. It is now known that married officers were deliberately selected for undercover work in the Special Demonstration Squad ['SDS'] and the National Public Order Intelligence Unit ['NPOIU'] – the units from which the undercover officers came – because it was thought that this would make them more likely to transition back to their former life at the end of the deployment, so reducing the risk of them “going rogue” or defecting and joining those they were spying on. The wives were also seen and treated as objects to be used to suit the purposes of these units rather than as people with rights to be respected.

THE STRUCTURE OF THESE SUBMISSIONS

8. PART A: The emergence of concern about undercover relationships and the central question: rogue officers or deliberate tactic?

PART B: The women's cases

PART C: The impact of the relationships

PART D: Common traits and evidence of system

PART E: The police response

PART F: Hopes and concerns for the Inquiry

PART A: The emergence of concern about undercover relationships and the central question: rogue officers or deliberate tactic?

9. The public first became aware of the scandal in undercover policing when the story broke about Mark Kennedy in the media in January 2011. It was presented initially as an extraordinary tale of a rogue agent, who had been inadequately supervised in his role as an undercover officer, operating in the name of 'Mark Stone', responsible for policing environmental protest. This had enabled him to have sexual relationships with a number of women and overstep the mark in a number of actions, leading to a collapsed trial and several successful criminal appeals.
10. But it was already clear by then that Kennedy was not alone. Other women who had been victims of similar deceptions, going as far back as 1990, had already started bringing to light their own truths about relationships with undercover officers posing as fellow members of political campaign groups. A pattern, repeated down the decades, was emerging.
11. Kennedy's cover was blown by 'Lisa'. She had been in a serious, committed relationship with him posing as 'Mark Stone' for six years when she discovered his passport in his real name, which included reference to a child. Initially, his false explanation convinced her, but doubts began to creep in as a result of inconsistencies

in his story. These were increased when she heard from other protesters that 'Jim Sutton' was an undercover officer, and that there were also doubts about another campaigner, 'Lynn Watson'. Concern was also raised about 'Rod Richardson'. Those doubts grew and in October 2010 she set about researching who Mark Kennedy really was. It was as a result of those searches that his cover was blown when she confronted him and got him to admit the truth.

12. Lisa came to learn about 'Jim Sutton' because of the efforts of 'Rosa' and Helen Steel to bring to light the truth about their own relationships. Helen was deceived into a relationship with 'John Barker' (whose real name is John Dines) between 1990 and 1992 when she was involved in a small environmental campaigning group called London Greenpeace. When, after an intense, committed relationship during which they planned a future with children, he suddenly disappeared, Helen went to huge lengths to try to find him, a search that took her across the world to New Zealand. While her searches were unsuccessful, over the ensuing years she uncovered information which brought her close to the truth and which led her to believe he had been a police officer. But those she spoke to told her she was paranoid and that such a thing would never happen in this country. This left Helen for 18 years in a state of appalling uncertainty and mistrust – mistrust in her instincts and in others.
13. 'Rosa', who became deeply involved with Jim Boyling in late 1999, undertook extensive searches when he too suddenly disappeared in September 2000. As with Helen, these took her to other continents. When her efforts to find him proved dangerous for the SDS because she managed to find their HQ, something had to be done about her. Two days later Boyling suddenly reappeared in her life, told her the truth that he was a UCO, but deceived her that he now hated the police and needed her help to escape them. 'Rosa', who was already suffering significant psychological trauma, and had been trapped in a nightmare where nothing made sense and where Jim appeared to be the only potential source of answers, was then groomed into believing that she held the key to Jim's escape from the police. Within two weeks Rosa fell pregnant to Jim and from then on was trapped in an increasingly abusive and controlling relationship. Jim subjected 'Rosa' to years of coercive control, continuing

his deception and requiring her to cut off all her ties with her former life under the guise of securing their escape from being under the police radar. During this time 'Rosa' learnt that 'John Barker' was an undercover officer, and also about Bob Lambert and 'Jason Bishop'. Helen had spoken to 'Rosa' about John's disappearance in 2001, when 'Rosa' was searching for Boyling. When 'Rosa' found out about 'John Barker', she desperately wanted to tell Helen the truth but Boyling made it impossible for her to reach her.

14. 'Rosa' endured almost a decade under Boyling's abusive control before she was able finally to free herself, and the children who had since been born, escaping to a women's refuge. In July 2010, she managed to get a letter passed to Helen to let her know that Jim Boyling had been a spy and hinting that she had further information she needed to share about others who had infiltrated animal rights and environmental organisations. Helen then told fellow campaigners, who in turn passed the information on to others. When Helen visited 'Rosa' in the Autumn, she explained in more detail that 'John Barker', Bob Lambert and 'Jason Bishop' had also been spies.
15. 'Alison' too had for her part undertaken extensive research into 'Mark Cassidy's' disappearance and real identity and had discussed her experiences and concerns with Helen in 2003, after being put in contact -by a mutual friend. With the information that 'Rosa' was finally able to share, and with the certainty that 'Lisa' had also uncovered a spy, Helen suggested that they should try to take wider action to expose what was going on, seek redress and prevent this happening to anyone else.
16. By the end of 2011, eight women had begun legal proceedings against the Metropolitan Police Service ['MPS'] in respect of the intimate sexual relationships they had been deceived into by undercover officers¹. A further claim was initiated in respect of two different women ('AJA' and 'ARB') and a different officer ('Marco Jacobs') in January the following year. In June 2012, 'Jacqui' saw an article in the Daily

¹ Those eight women are known as 'Lisa', 'Naomi', Kate Wilson, 'Rosa', Helen Steel, 'Ruth', 'Alison' and 'Belinda' for the purposes of this statement. Names in inverted commas are pseudonyms.

Mail about a former undercover police officer known as ‘Bob Robinson’, real name Bob Lambert, who had been named by Caroline Lucas MP as having planted an incendiary device in a branch of Debenhams in the course of his infiltration of the Animal Liberation Front. ‘Jacqui’ recognised the man in the photographs as her former partner and the father of her son, whom she had believed to be an animal rights activist who had disappeared from her and her son’s life in 1988.²

17. Since then further women have come forward, including, as noted above, when cover names have been released by the Inquiry. The accumulation of cases raises the pressing question: are these really all instances of individual officers acting beyond their authority or is the pursuit of intimate relationships with women a deliberate tactic?
18. The women strongly believe that there are too many similarities between their cases and too many instances of UCOs having relationships for the MPS to maintain the position it has adopted to date, that these relationships resulted from a lack of supervision and were not known about or acquiesced in by more senior officers. Through speaking to one another and sharing their experiences, the women have been able to identify recognisable techniques and traits that resurface repeatedly in these relationships. These are addressed in Part D below.
19. This is one of the reasons why it is so critical that the Inquiry should draw on the knowledge and experience of the women – and indeed of all non-police, non-state core participants [‘NPSCPs’] – to aid with its investigation and not seek to compartmentalise NPSCPs’ participation into temporally restricted categories, as at present. It is by painstakingly piecing together the many fragments of their experiences that the important patterns and themes emerge. The women know how they have been shaped by their experiences and how, as a result, they are able to recognise things in each other’s accounts that would not occur to those who have not experienced anything similar.

² An interactive timeline of undercover relationships is available here: <https://www.spycops.co.uk/timeline/>

20. Getting to the truth is also critically important to enable them to move on with their lives. This necessarily includes understanding the wider systemic issues of how these secret units developed and evolved from the start; how the attitude towards sexual relationships and using the women came about; how knowledge and techniques were shared; who knew about the sexual relationships; who within the police sanctioned such behaviour over so many years; whether they were condoned or encouraged; if not, why they were not stopped, given the frequency with which they were occurring; the history of surveillance of the women while they were searching for missing partners; the development of containment exercises when they were deemed to have found out too much. And finally, the women need to know, as part of a community of women affected in this way, that all those affected have been found and have support; and that robust legal measures are in place to ensure that these abuses cannot be repeated in future.
21. In due course, the Inquiry is likely to see psychiatric and psychological evidence in respect of the harm that undercover policing, and the relationships in particular, have done to the women. Time and again, these reports refer to the importance of learning the truth in order to be able to heal. The Inquiry was, at least in part, set up for the purpose of ‘establishing justice for the families and victims’³ and it should have at the forefront of its priorities, not only ensuring that its process does not exacerbate the harm done to the women, but that it gives them the answers they need to heal.
22. The strength of the need to know the truth is illustrated by the efforts of Kate Wilson, in her pursuit of proceedings in the Investigatory Powers Tribunal [‘IPT’], notwithstanding that the MPS has settled her common law claim arising out of her relationship with Mark Kennedy. The other women who had brought claims against Kennedy were prevented by the terms of settlement from pursuing the HRA claims. For those who had relationships before the HRA entered into force, the choice was never open to them.

³ Written statement to the House of Commons by Theresa May, Secretary of State for the Home Department, 12 March 2015.

23. In a witness statement made in those proceedings, Ms Wilson explained:

“I have no criminal convictions, even for minor offences, and the only reason that these officers entered my life at all was because I was expressing my political views and exercising my right to protest.

I still do not know after six years of litigation in the High Court whether Mark Kennedy defied his guidelines and supervisors and began to share his life with me in a dangerous web of lies he told me, but also his handlers. The alternative is a much harder reality: my sexual violation and emotional manipulation were not simply a negligent oversight by managers and supervisors. They were considered tactical decisions in the police’s highly questionable battle against a thousand or more political groups in this country and abroad.

I still don’t know what the true story is. But over the last six years new information and new perspectives have emerged that have forced me to accept that it is probably the latter narrative that is closer to the truth.”⁴

24. Since then, some minimal disclosure has been made to Ms Wilson, which has led to her making a further statement, including the following:

“I am... acutely aware that the information I have been given is a drop in the ocean, the result of a conscious selection by the MPS of what they have chosen to reveal, and that there is very much that I still do not know. Nevertheless, even that tiny and over-redacted sample has answered more of my burning questions than seven years of police defence statements and admissions.

Not only is it now obvious that the actions of other officers are central to my claim, following this disclosure it is also clear that the Defendant’s characterisation of the central claim in this matter as being “the sexual relationship carried on by MK and the failure to properly supervise MK such that the relationship took place” is inaccurate. As I will discuss below, it was not simply a lack of supervision, there was active collusion by management in the relationship and direct manipulation of my political activity.”⁵

25. In other words, even the minimal, selective and highly redacted disclosure so far made to Ms Wilson in the IPT proceedings has already enabled her to shed highly critical light on the way in which the MPS has sought to characterise the context of her relationship with Mark Kennedy. The admissions in Ms Wilson’s IPT claim do not only relate to the actions of Mark Kennedy but also to six other undercover officers and

⁴ Witness statement of Kate Wilson IPT/11/167/H, dated December 2017.

⁵ Second statement of Kate Wilson IPT/11/167/H, dated 26 September 2018

Mark's principal cover officer ['PCO']. The Tribunal has made it clear that the state of knowledge of other, more senior officers about the Article 3 breaches, while not now admitted, will be a key matter to be determined at the substantive hearing of the claim. This ought to highlight for this Inquiry the value that those with lived experience of undercover policing can bring to the Inquiry's search for the truth. It ought also to highlight that, as one of the women has described it, the truth in relation to undercover policing is like an onion, there are layers and layers to peel away. In order to get behind the superficial, partial truths, the Inquiry needs the assistance of those who are able to critique the police documents, based on their own lived experience. It will ultimately be for the Inquiry to determine where the truth lies, but it will not be able to fulfil its task if it does not open the police documents and evidence up to scrutiny by others who were also there at the time.

PART B: The women's cases

'Lizzie'

26. In 1982, a teacher, 'Lizzie', became interested in the animal rights movement. She became a vegan and joined the South London Animal Movement ['SLAM']. She campaigned against animal abuse in legal and peaceful ways, for example by leafleting and attending peaceful protests.
27. In 1984 or 1985, she met a man who went by the name of 'Mike Blake'. They met at several demonstrations. In October 1985, following the big Campaign for Nuclear Disarmament ['CND'] rally in Hyde Park, 'Lizzie' and Mike went for a meal together, and after that a romantic sexual relationship began. 'Lizzie' found Mike to be extremely loving, attentive, passionate and open. Over the coming months they spent most weekends together and two or three nights during the week. They went on holiday together.
28. In or around March 1987, after approximately a year and a half together, Mike told 'Lizzie' that he was thinking of moving to the United States and that he had been offered a job in Florida. Mike left in May 1987, but he told 'Lizzie' that it wasn't the end and that he would be back. He gave her an address and they planned that she

would visit him. However, after Mike left, he didn't reply to 'Lizzie's' letters. She was heartbroken.

29. In October 1987, on the anniversary of the 1985 CND march, 'Lizzie' found a leaflet from the 1985 march on the windscreen of her car. She thought that that was a sign from Mike and she went to Hyde Park to see if he was there, but she didn't find him.
30. In or around 1989/1990, Mike suddenly reappeared in 'Lizzie's' life. He telephoned her at work, completely out of the blue, and tried to explain why he had not been in touch. He told 'Lizzie' that he had a son that he had not told her about and that that was the real reason he had gone to the US. He said he thought that 'Lizzie' would think badly of him for having abandoned his son and that that was why he hadn't told her. 'Lizzie' agreed to meet him and they tried to resume their relationship, but it didn't work. After that, a pattern developed of Mike turning up and trying to persuade 'Lizzie' to resume the relationship, and then he would disappear again. Eventually 'Lizzie' lost trust in him and the relationship ended.
31. 'Lizzie' did, however, see Mike again in 1993, by which time 'Lizzie' had had a baby with another man and she was raising her child alone. 'Lizzie' decided that she needed to cut off all contact with Mike as she did not want her daughter's childhood disrupted by Mike's ambivalence and inability to commit.
32. The relationship and the way it collapsed impacted on 'Lizzie' very significantly and she has never been able to form another intimate relationship of any duration. For a number of years 'Lizzie' worked therapeutically with very damaged children and that, together with the impact of her relationship with Mike, led to a breakdown. She was subsequently medically retired from her job.
33. 'Lizzie' learned that Mike had in fact been an undercover police officer in or about 2013, when she was contacted by an old friend from her campaigning days. The friend told her that the man they had known as 'Mike Blake' was in fact Mike Chitty, an undercover police officer. 'Lizzie' was initially unable to process this information

and her psychological response was to bury the news and suppress all memories of the relationship, throwing away all reminders as they were too painful for her to keep.

34. 'Lizzie' did not hear anything further about Mike until 20 February 2017, when, out of the blue, she received a hand delivered letter from the solicitor to the Inquiry informing her officially of what she had been told earlier by her friend. This came as a complete shock, as she had not even been aware of the Inquiry's existence prior to that point.

Belinda Harvey

35. In 1987, Belinda began a relationship with a man she knew as 'Bob Robinson', now known to be Bob Lambert. Belinda met Bob at a house party hosted by a university friend who had been involved in animal rights issues. Belinda was a committed vegetarian but had never been involved in any form of political activism.
36. Bob offered Belinda a lift home from the party and an intense romantic intimate relationship began from there. Bob claimed to be a committed vegan and was involved in many political groups, including London Greenpeace (a small environmentalist collective not connected to Greenpeace UK), a hunt saboteurs group and the Animal Liberation Front. He introduced Belinda to his animal rights activist friends and tried to encourage her to become involved in London Greenpeace. Bob was very charismatic and the other activists appeared to be somewhat in awe of him. Belinda was aware that Bob had co-written the leaflet about McDonalds, which subsequently led to Helen Steel and Dave Morris being sued by McDonalds for libel.
37. Occasionally Bob would bring his two year old son from a former relationship over to stay. Bob's son mostly lived with his mother, Bob's former girlfriend, Jacqui⁶.
38. In around July 1987, Bob told Belinda that he, together with some other animal rights activists, were going to plant incendiary devices in three Debenhams stores in Luton,

⁶ Jackie was also deceived into a relationship with Bob Lambert – see reference at [16] above to Jackie learning of Lambert's true identity when reading the Daily Mail in 2012.

Harrow and Romford. He told her that the purpose of this was for the devices to set off smoke alarms to damage the fur products sold by Debenhams, but that they would not harm any people. Belinda tried to persuade Bob out of this, but the action went ahead and two activists were arrested and convicted. They received lengthy prison sentences, but Bob was never arrested.

39. In around February 1988, Bob moved into Belinda's flat and in May 1988 the flat was raided by Special Branch – apparently looking for Bob. Belinda felt very uncomfortable about this and moved out. However, the relationship continued, Bob had been integrated into Belinda's extended family and Belinda decided that she wanted to have children with him. Bob told her that he didn't want this and soon after, in October 1988, he said that he was going to have to go on the run, because the police were catching up with him. In December 1988, Bob and Belinda went away for a final week together before he left (as she was led to believe) for Spain. He wrote her a letter from Valencia, which she treasured for many years, but she did not hear from him again.
40. Belinda was devastated by Bob's departure. For years after, Belinda tried to live a life that was close to the ideals that (she believed) Bob had held. It took her many years before she was able to have another relationship, because it was difficult for anyone else to live up to her relationship with Bob.
41. In August 2011, Helen Steel, who Belinda had known briefly when Bob was involved in London Greenpeace, told Belinda that the man they had known as 'Bob Robinson' was suspected of being an undercover policeman called Bob Lambert. She asked Belinda to view video footage of Bob to see whether she recognised him. When Belinda viewed the footage of Bob Lambert, she immediately recognised that this was the same person who she had known as 'Bob Robinson'. By then, Bob Lambert was a well-known academic, who had worked for a number of years as the head of the MPS' Muslim Contact Unit and had previously worked in Special Branch. Belinda subsequently discovered that at the time of their relationship, Bob was in fact married with two children.

Helen Steel

42. Helen is a long-standing political activist and campaigner for social justice. She became vegetarian aged 14 and began campaigning for animal rights after her agriculture class at secondary school visited a slaughterhouse taking pigs, which she had looked after, to be slaughtered. She felt and feels strongly about cruelty, injustice and oppression and within a year of leaving school she joined other campaigns on a range of environmental and social justice issues, including for women's rights, anti-racism campaigns, the peace movement, and workers' rights. Working to create a fairer, more sustainable world is of central importance to her life.
43. In 1987 she started attending the weekly meetings of London Greenpeace. Later that year, at the age of 22, Helen met a man at a London Greenpeace meeting, who called himself 'John Barker'. John also began to attend the meetings regularly and would offer to drive people home after meetings in his van, as well as to and from protests.
44. Helen was often the last person to be dropped off, so they chatted about their lives and over time they became closer. John seemed to care about Helen and expressed interest in her life and seemed to open up about his own. John said that he was a builder and kitchen fitter and was from New Zealand. He claimed to have been involved in political activity there, including protests against the apartheid South African Springbok Rugby tour. He was nicknamed 'New Zealand John' or 'John the van'.
45. John often initiated conversations with Helen and they discussed their lives and families. At a social event around Christmas 1988, John told Helen that his father had just died. In August 1989, John sent Helen a birthday card written in Maori expressing his love for her. He let Helen know that he was interested in a relationship with her. They became very close, but did not start an intimate relationship until 1990.
46. That happened after John told Helen that his mother had died and he needed to fly to New Zealand for the funeral. Helen lent him money towards his flight and he stayed

overnight at her house before the flight. John talked about his mother's death and Helen tried to support him. Whilst away, John wrote to Helen, describing his emotions and thanking her for her help and support.

47. Soon after John returned from New Zealand in March 1990, he gave Helen a love letter with a greenstone pendant. Helen didn't wear jewellery, but John wrote that it had been given to him years before by an old Maori woman and went on 'I know you're not into such things, but I've worn it every day until now. It's worth little, but it's real valuable to me. It's all I have to give and I'd like you to have it; you're something else I became attached to.'
48. On 18th March 1990, after going to a pub with John and another friend, Helen was asked to drive John's car back to his flat in Castlewood Road, Stamford Hill, with John and the other person as passengers. This was the first time Helen had driven his car. While driving in Castlewood Road, a back street, the car was stopped by the police and Helen was given a producer. Helen now believes this was a set up arranged by John.
49. On 31st March 1990, Helen attended the national anti-poll tax march from Kennington Park to Central London attended by hundreds of thousands of people. Helen went with her local anti-poll tax group, Tottenham Against the Poll Tax, but while on the march, in Whitehall, she bumped into John and chatted for a while before losing him in the crowd. John subsequently told her that he had been arrested in Whitehall trying to protect someone from police violence. He gave the name Wayne Cadogan to the police and did not attend court. He wrote an account of this arrest which was published as a chapter entitled "Mr Sweeney and me" in the "Poll Tax Riot" pamphlet.
50. Around this time, John visited Helen early one morning and said that his flat had been raided by the police. He asked Helen to telephone his boss at Kingswood Fitted Kitchens to say he wouldn't be in to work. Helen did this and passed on whatever excuse John had given. John's boss then told Helen to tell John that the police had been to his workplace looking for him. John then said he needed to go on the run. He didn't say why, although he said it was serious and that Helen shouldn't talk to anyone

about it. John said he was going camping in the Lake District and sent Helen letters from there. She felt in emotional turmoil and was very worried about his welfare.

51. In early May 1990, Helen received a phone call from a man who said he was a solicitor who asked her if she knew John Barker, and then told her not to say anything over the phone as it could get him in trouble. The solicitor then told her that John had been arrested and was at Paddington Green police station, where he had been held for several days. She received a further phone call the following day informing her that John was about to be released and would she come to meet him at the police station. When Helen went to meet John at the police station, he was reluctant to discuss what he had been arrested for. He was never charged with anything.
52. Helen recalls that sometime later she went with John to a solicitor's office near New Scotland Yard in connection with his passport which he said had been confiscated during the arrest and had been lost and that he was issued, via the Metropolitan Police, a 'replacement' passport in the name of Philip John Barker.
53. Later in May, John rented a bedsit within a mile of where Helen lived. Helen helped him decorate the bedsit and move in, and from then on, they spent considerable time together, with her staying at the bedsit on a regular basis. John would regularly tell Helen that he loved her and her feelings for him deepened. In June 1990, Helen and John went away on holiday together for a week on the island of Barra in the Outer Hebrides. They later went on other shorter trips together.
54. In September 1990, Helen and a number of others involved in London Greenpeace were served with a Writ from McDonalds accusing them of libel arising from a leaflet published by the organisation. The original leaflet, which was the subject of the libel case, had in fact been written by a sub-group of London Greenpeace (before Helen had been involved with the group). One member of this sub-group was Bob Lambert⁷.

⁷ See Belinda Harvey's case above.

55. The Writ was served on Helen outside John's bedsit, as she stepped from his van and although John was involved in the campaign and distribution of anti-McDonald's leaflets, he was not a named Defendant in the libel claim. He was involved in the initial support and fundraising campaign for the McLibel Support Campaign, including writing leaflets and organising benefit gigs to raise money. John also collected Helen from early legal meetings about the libel case and discussed with her what had happened at those meetings.
56. In October 1990, John told Helen that his Aunt Dorothy was visiting the UK. John went to see her and subsequently told Helen that Dorothy had informed him that his mother had had an affair and that the man he had grown up thinking was his father had not in fact been his biological father. At some point, John told Helen that the surname of his biological father was Dines.
57. In early December 1990, John and Helen moved in together, in a shared rental flat near Seven Sisters in Tottenham which John found and arranged. John had repeatedly told Helen that he loved her and wanted to be with her forever. For her part, Helen was also in love and thought that she had found her soul-mate. During the time they lived together, John initiated conversations about having children and said that he would like to have a big family, because he had been an only child. John also told Helen that he was waiting for money to come through from the sale of his mother's house and then they could use it to buy a smallholding to live together in the countryside and have children.
58. During the time that they lived together, John would leave as if to go to work, either as a kitchen fitter, or later as a builder on construction sites. For a lengthy period he said he was working on the Mirror Printworks site in Oldham and would spend several days at a time away from the flat, before returning in his van wearing work clothes. He would often send letters to Helen describing the scene at his workplace or lodgings.
59. In summer 1991, Helen returned home one day to find a tear stained letter from John saying that he couldn't carry on and was leaving home, although he expressed his

continuing love for her. This letter came as a bolt from the blue. Helen was deeply distressed by this but had no means of contacting John as this was before the days of mobile phones and email. However, within a couple of days, John rang and apologised and came back. After this, however, he appeared to be going through some kind of mental breakdown, which he attributed to having no family and his previous significant ex partner deserting him, which he said led him to fear that Helen would do the same, despite her reassurances that she loved him. He would disappear at nights, then say he had been walking the streets to clear his head. He also went off on longer camping trips around Scotland and Ireland to 'sort his head out'.

60. During this period, Helen and John talked about their relationship and despite the difficulties, John said he still wanted to buy a place in rural Scotland where they could live together and start a family. Helen felt reassured by this and it became their long-term plan. Some friends from Yorkshire invited them both to move into a caravan to provide some help with their small holding and have a taste of rural living and John and Helen decided that this could be the first stage of their eventual move to Scotland.
61. In November 1991, they packed up their flat and moved their belongings to Yorkshire. However, John did not move in. He told Helen that once again he felt unable to cope and that he was going travelling in France for a couple of weeks to clear his head. He sent letters to Helen from France, and then told Helen that he had obtained work on the Channel Tunnel construction site to earn more money towards buying a house. He provided a poste restante address and in his subsequent letters described working on the Channel Tunnel and complained about pay and health and safety issues.
62. Between November 1991 and March 1992, Helen and John corresponded and spoke over the phone regularly, although Helen was reliant on John calling from public call boxes as she had no phone number for him. In December 1991, they arranged to meet in Canterbury and spend the weekend together in a B & B. When Helen arrived at Canterbury station, John had short hair and was clean shaven for the first time since she had known him. She now assumes this meant he had left his SDS deployment.

63. In January 1992, John visited Yorkshire and stayed with Helen in the caravan for a few days over his 'birthday'. At this time, he re-affirmed his desire for them to buy a house and live together in Scotland and start a family. Sometime after this, John wrote to Helen that he had tracked down and met his biological father. Initially he said that the meeting had gone well, and he described finding out that he had three siblings, although he could not meet them as his father had not told his family about John. However, in a subsequent letter, John claimed that actually the meeting had not gone well and his father had not wanted to know him and this was another reason why he had given up faith in other people.
64. Helen attempted to persuade John to attend counselling with her in an attempt to resolve some of the problems, but he refused. Over a prolonged period of time, while consistently telling Helen that he loved her and wanted to be with her, John would fluctuate between telling Helen he wanted to buy a house with her and start a family, and then saying he had to go and could not cope with his fear of her leaving him and him being all alone in the world. Helen was on a rollercoaster of uncertainty and emotional distress as a result of this, at times so severe that she wished she was dead. Given that in fact John was actually married, and that his parents were still alive and he actually had three siblings (so was not at all alone in the world), his behaviour amounts to gratuitous emotional abuse and leaves Helen questioning whether this was actually a deliberate attempt to destroy her sanity and so end her participation in political campaigning. John was well aware of Helen's distress at this time and actually referenced this in some of the letters he sent to her. Helen wants to know what oversight and management there was of John during this period, and indeed throughout his whole deployment.
65. In April 1992, Helen came down to London to stay with a friend, expecting to meet with John. They had arranged to speak by phone to sort out when to meet, but John didn't call when arranged. Increasingly worried about his mental health, Helen borrowed a friend's car to look for him on road-building sites near Tring, where he claimed to be working at the time. While she was out, John telephoned the friend wanting to talk to Helen and sounding upset. The friend told him that Helen would be

back later but he said that would be too late, he would be gone and that he had put a letter in the post to her. Helen was again extremely distressed by this and fearful for his wellbeing.

66. A few days later, Helen received a letter from John, which had been posted in the UK postmarked 3 April 1992. It was very emotional and talked of him being physically and mentally abused by his family, including being slashed with a knife by his mother as a child when she was in a rage, of running from beatings, chastisement and abuse for as long as he could remember, and of feeling guilty when she died. He said he had no hope left in people, but ended by stating "I love you, I love you... I'm at Heathrow on a flight to South Africa... I've loved you every minute we have been together...".
67. Helen was desperate with worry about John, even fearing that he might take his own life. She tried contacting him via consulates, embassies and hostels in South Africa, but got nowhere. She also visited the address in Derbyshire which was on John's birth certificate, hoping to make contact with anyone who might know where he was, but despite knocking on the door throughout the day, no-one answered.
68. Later that month she received two letters from him sent from South Africa. The first letter, postmarked 16 April, talked about being beaten senseless as a child for years on end. He said he was angry with himself for 'sodding you around', he apologised and also said 'You must believe Helen, that I was being sincere when I talked about kids, a home, travelling with you and making a pond. But it'll only ever be a dream now – I must start to realise that.' He ended by saying 'I had intended to write on – why I don't know anymore, so I'll just say goodbye Helen – all my love J.'
69. The second letter, postmarked 23 April stated that he loved her. He wrote 'I don't want to leave you alone, but I must. I have to stop hurting you any longer.' On the last page he said 'I hope I can stop running away from you and my problems some day – if I can I'll come running back to you.' This gave Helen hope for the future, but she never heard from him again.

70. Helen was devastated by John's departure and very fearful for his safety given the emotional content of the letters. She spent a great deal of time and money trying to track him down. She researched how to find missing persons and discovered that the Salvation Army had a tracing service so she asked them to try to find and contact him, but they had no success. She then met and paid a private detective to try to locate him, again without success. She visited the New Zealand consulate and looked through telephone directories there to track down a phone number for his 'aunt' Dorothy in New Zealand. Dorothy (who Helen later learnt was in fact not John's aunt, but his mother-in-law – John being married at the time), initially said she had not heard from John, but then a few weeks later said she had heard that he had returned to the UK and was back working for his old employer. The following day, Helen travelled by train from Yorkshire to Hertfordshire to visit the employer, but on arrival she was told that John had left the job the previous Friday.
71. Helen paid for searches of the New Zealand death registries for the deaths of his parents in the hope of obtaining addresses or information that might assist in finding John, but these came back as showing no trace of John's parents' deaths. She became depressed, withdrawn and isolated from her friends. In early 1993 she moved back to London, in part wanting to be closer to old friends for support, but also because the McLibel trial was starting to have regular pre-trial hearings and it was increasingly impractical to prepare and work on the case from Yorkshire.
72. From this point on the McLibel case took up increasing amounts of her time before the trial itself started in June 1994. In December that year, leaving the court and walking back to the tube station, Helen passed St Catherine's House and on instinct went in to search death records working from John's date of birth. She then discovered a record of a child who had died at the age of 8, called Phillip John Barker. His details coincided exactly with those she had seen on John's birth certificate and passport.
73. Helen realised that this meant she no longer knew who John was. She didn't know his real name or anything about the person she had been deeply in love with. If the person she had been closest to and had lived with was capable of this level of deceit

without her being aware of it, how could she trust anything anyone said, or her judgment of it? This impacted on every aspect of her life, it interfered with her friendships and political associations and it had severe implications for future relationships. Helen contemplated whether John had been a spy of some sort, either police or corporate (the McLibel trial had revealed that several corporate spies had infiltrated London Greenpeace). This made her very anxious and she felt that she could not talk about what she had discovered for fear that it would get back to him or those paying him and that they would then make it harder for her to find out the truth. This also meant that although she was deeply distressed by what had happened, she felt unable to talk to others or attend counselling to relieve the distress for fear he or his employers might find out. Effectively she bottled up the truth and shut down her emotions, which impacted still further on her mental health and affected her friendships.

74. Over the years, Helen still made efforts to search for John. Eventually, through a process of her own detective work, she believed that she had found proof that the man she had known as 'John Barker' was, in fact, John Gerard Dines, which Helen recalled was the same surname as he said was his biological father's. In March 2003, she obtained a copy of his marriage certificate and recognised his signature. The certificate showed that he was married to Debbie W***, which was the surname of 'Aunt Dorothy' in New Zealand, indicating that 'Aunt Dorothy' was in fact Dines' mother-in-law. John had also consistently said that his previous significant ex was called Debbie.
75. Dines' occupation at the time of his marriage in 1977 was recorded as 'police constable'. When she read this Helen went into shock, physically feeling her blood run cold and feeling like she might collapse, as well as struggling to control her grief in the public space of the records office. She had to call a friend nearby to come and take her home. Not long after this, she found John's adoption certificate, which revealed that he was in fact five years older than he had told her at the time of their relationship – 10 years older than her. This increased her sense of having been abused by John.

76. However, on discussing this discovery with a few people she had known a long time, including her father, he and others responded suggesting that she was being paranoid thinking that John had been an undercover policeman, they suggested that sort of thing didn't happen in this country, and there were probably far less interesting reasons for John's behaviour. This resulted in Helen feeling doubt about whether she could trust her own judgment, whether she was in fact becoming paranoid, and also feeling that without further proof, she would not be believed. She then attempted to trace John's path in the police to see if she could find this proof, but beyond discovering that he had lived in police married quarters for the next two years after the marriage, she was unable to find out anything further.
77. In 2000, Helen bumped into 'Rosa', whom she had known from Reclaim the Streets in the late 1990s. 'Rosa' had been in a relationship with a man they had both known as 'Jim Sutton'. 'Rosa' told Helen that Jim had suddenly gone missing and had disappeared to South Africa. Helen was shocked by the similarities with her experience, but still had doubts about who she could trust, so skirted around details of her own experience with John. She later heard that 'Rosa' had gone to South Africa to search for Jim and also heard rumours that Jim was suspected of being a police officer. However, later, Helen heard that Jim and 'Rosa' had been seen together at the Kingston Green Fair and had a child, so people were convinced that the rumours must have been false.
78. In 2003, a friend of Helen's whom she had talked to about John, told her that she knew someone who had had a similar experience. This was 'Alison' – see [102 - 116] below. Helen met up with 'Alison' and a mutual friend and discussed their respective experiences with the men who they believed were state agents. But again, Helen struggled with being able to trust whether 'Alison's' experience was real or whether this could be a trap designed to draw information from Helen to ascertain how much she had found out about John.
79. In Summer 2010, Helen was visited by an old friend who hand-delivered a letter from 'Rosa'. It was cryptic, but alluded to Jim being a police officer. The friend confirmed

that Jim was a police officer and that 'Rosa' wanted that information shared with people who had known him. Helen passed that information on to others who had known Jim. A couple of months later, Helen went to visit 'Rosa' who explained in much greater detail what she had alluded to in the letter. 'Rosa' told her that Jim had said he felt sorry for Helen, because he was the third undercover officer she had known, the others being Bob Lambert and John Dines. Jim had also told 'Rosa' very private details about Helen's life, which must have been shared with him by John, or the SDS, as he could not have known them otherwise. 'Rosa' also told Helen about 'Jason Bishop' and an informer called 'Simon' who also infiltrated 'Reclaim The Streets'. Helen was deeply shocked to hear the details of what had happened to 'Rosa' after she & Jim had disappeared.

80. 'Rosa' also told Helen that Bob Lambert was a senior figure within the unit and was understood to have been the 'handler' for both Jim and John. Helen later looked up Lambert's details online and realised that he was likely to be the man she had known as 'Bob Robinson' who had been part of London Greenpeace. Helen did not feel 100% sure that he was the same person, but she recalled Belinda having had a relationship with Bob Robinson, so she made arrangements to see Belinda and show her video footage of Bob Lambert. On viewing the footage in August 2011, Belinda immediately confirmed that it was the same person.
81. In October 2011, Helen and four others from London Greenpeace attended a conference held in the TUC headquarters, where Bob Lambert was due to speak. After he had spoken, they publicly challenged him to apologise for having infiltrated London Greenpeace in the 1980's and for deceiving women into relationships. They also contacted the press and the story was reported in the Guardian. In the aftermath of this, Bob Lambert issued a public apology to London Greenpeace and to Belinda for his deceit.
82. Helen was alarmed by the police using these deceptive relationships as a tactic, despite the significant harm caused to women, and suggested to 'Lisa', 'Rosa', 'Alison' and Belinda that it would be good to try to bring a case to expose what had happened and try to prevent it from happening to anyone else. As a result, they launched the

legal proceedings set out at paragraph 16 above with other women. These legal proceedings and the obstructive approach of the police towards the women learning the truth, further significantly impacted on Helen's life and mental health.

83. In March 2016, Helen confronted John Dines at Sydney Airport after discovering that he was a course director at the Australian Graduate School of Policing & Security, which was part of Charles Sturt University, and was about to deliver training to Indian police officers with course content that included 'left wing extremism'. She was extremely concerned that he might be providing training in the discredited tactics which had led to her and other women being abused by him and other officers in the UK. During a conversation at Sydney Airport she asked him why he had deceived her into a relationship and he replied with words to the effect of 'what did I have, all I had was a van'. Helen took this to mean that he used her for the purposes of providing cover for his fake identity.
84. The effects on Helen of John Dines' deceit are hard to convey. She was deceived into falling in love with him and, having done so, was kept in emotional turmoil for years as a result of his conduct and disappearance; not knowing who he was; whether he was alive or dead; and whether or not he might return. His disappearance dominated her life for many years and has permanently and deeply affected her ability to trust and form further relationships. This in turn resulted in her being unable to have children, by the time she was able to enter a relationship which was stable enough to contemplate having children, her age meant that she had a series of miscarriages.
85. Helen is also deeply concerned about the links between the SDS, Special Branch and corporations, such as McDonalds, and about the sharing of information between them. In 2009, when the Consulting Association office was raided by the Information Commissioners, her name was found on their index of files, indicating that a blacklist file was held on her, although her file was not among those seized by the ICO.
86. She is concerned that during the McLibel proceedings there was a two-way flow of information between the MPS and McDonalds, including information obtained by John that was subject to legal professional privilege. During the libel trial, Sidney

Nicholson, the Head of Security at McDonalds, to whom information was passed by the MPS, gave evidence that he was, himself, a former police officer, and that all of McDonalds' security department at that time were ex police officers. Nothing of the involvement of Dines or Lambert was disclosed to the High Court during the libel trial.

87. Helen and Dave Morris subsequently brought separate legal proceedings against the Metropolitan Police in 1999, in respect of unlawful disclosure by the police of private information to McDonalds, which was revealed in the operational notes of one of the private investigators hired by McDonald's to infiltrate London Greenpeace. This culminated in an award of damages and a public apology from the MPS as part of the settlement of that claim. Again, nothing about Lambert and Dines was disclosed during those proceedings. As far as Helen is aware, there was never any application by the MPS to withhold disclosure on grounds of public interest immunity in those proceedings.
88. In addition to her relationship with John, Helen is aware that she also encountered many undercover officers through her involvement in political activity. This includes Mike Chitty, Bob Lambert, Jim Boyling, Jason Bishop, Matt Rayner and Mark Kennedy. She is concerned about whether some of the officers whose cover names have been withheld may also have been spying on her.

Denise Fuller

89. Denise Fuller had an intimate relationship with a man she knew as 'Matt Rayner' between 1991 and 1994. 'Rayner' is now known to have been an undercover officer with the SDS. Further details of this relationship will be supplied to the Inquiry in due course.

'Bea'

90. Between 1992-1993, 'Bea' had a sexual relationship with a man she knew as 'Bobby' or 'Anthony Lewis'. 'Bea' first met 'Bobby' in 1992 at a meeting of the Socialist Worker Party ['SWP'] in Dalston. 'Bea', was extremely vulnerable at the time as she was a single parent of two very young children, having just returned to the UK from Jamaica in order to escape a violent and abusive relationship. The evening on which

she met 'Bobby' was the first time she had been out without her children since returning to the UK.

91. She and 'Bobby' began an intimate relationship soon after meeting. 'Bobby' told 'Bea' that he also had young children the same age as 'Bea's', but they were living in Germany with their mother, his ex-partner. During the course of their relationship, 'Bobby' would stay overnight at Bea's home two to four nights per week. 'Bea' thought 'Bobby' was gentle and trustworthy and viewed the relationship as a salvation after the traumatic relationship from which she had just escaped.
92. In early summer 1992, 'Bobby' failed to show up for a date. This was completely out of character and Bea was concerned. She realised she didn't know his address and had no way to contact him, with the exception of a pager number that he wasn't answering. She panicked – telephoning hospitals and even morgues to try to find him. 'Bobby' reappeared several days later, saying that he had been to Germany to see his children. She feared that he was hiding something from her. To allay her concerns 'Bobby' gave her the address where he claimed to have been staying and subsequently took her to his bedsit. Nonetheless, the disappearance and his elusiveness led to the couple breaking up for around a month. 'Bobby' subsequently pursued 'Bea' and they got back together. The relationship then continued until the summer of 1993, when it was ended by 'Bea'. She recalls 'Bobby' being keen for it to continue. Around a year after the breakup, 'Bea' received a letter from 'Bobby' that had been sent from Egypt. He claimed to be working in bazaars looking after tourists.
93. 'Bea' had no further contact with 'Bobby'. In 14 June 2019, she was contacted by the UCPI, informing her that it had reason to believe that she had been affected by undercover policing and "in particular by the deployment of an officer whose work is under investigation by the Inquiry". She was told that the man she had known as 'Bobby' had in fact been an undercover police officer with the SDS. She has not been given any further information.

'Jessica'

94. In 1992, when 'Jessica' was 19 years old, she met a man she knew as 'Andy Davey'. They were both involved in London Boots Animal Action demonstrations. Andy was known as 'Andy Van', because he drove a white transit van and often gave lifts to activists attending demonstrations. Andy was a regular visitor to the shared house where 'Jessica' lived with other animal rights activists. Andy claimed to be 24 years old at the time.
95. One day when Andy was visiting, he and 'Jessica' ended up sitting alone on a bed watching a movie. Without warning Andy kissed her. 'Jessica' was surprised and confused as it was so unexpected and she was not attracted to him. She did not know how to respond and did not feel confident enough to tell him that it was not wanted.
96. Andy continued to visit the house and began to spend more time with 'Jessica'. Andy appeared to assume that they were now having a romantic relationship and eventually it did become intimate. Andy would spend a couple of nights a week at 'Jessica's' house. Occasionally, he would go to 'Jessica's' parents' house with her. Andy was 'Jessica's' first proper boyfriend.
97. Andy told 'Jessica' that he had a two year old daughter called Sophie and that he was separated from her mother and not allowed to see his daughter.
98. In September 1992, 'Jessica' accepted a job in France. She and Andy continued a long-distance relationship from September 1992 until June 1993. When 'Jessica' returned to the UK in June 1993, she continued the relationship with Andy, spending time living between his flat and her parents' home. In August 1993, 'Jessica' ended the relationship after meeting someone new. However, they remained friends until some time in 1994 when they lost contact with each other. Prior to losing contact Andy told her that he planned to leave the UK to teach English in the Czech Republic. She assumed that this was where he had gone when she heard that he had moved away in February 1995.

99. In around February 2017, 'Jessica' learnt that Andy had been an undercover police officer when she re-connected with an old friend from the animal rights movement. The friend linked her into a Facebook group, on which 'Jessica' saw photographs of Andy and realised that he had been a UCO, whose real name is Andy Coles. Coles had gone on to become a Detective Inspector within the MPS and was, at the time of her discovery, the Deputy Police and Crime Commissioner for Cambridgeshire and a Conservative Party Councillor for Peterborough Borough Council (which he remains to date). He is now also known to have been the original author of the Tradecraft Manual, which advised SDS undercover officers "If you have no other option but to become involved with a weary [the manual's term for activists], you should try to have fleeting, disastrous relationships with individuals who are not important to your sources of information."⁸
100. 'Jessica' also discovered that Coles was in fact considerably older than he had claimed to be. He was 32 years old when he had initiated a relationship with her, aged 19, not 24 as he had claimed. He had also been married at the time.
101. The discovery that Andy was a UCO has had a significant traumatic impact on 'Jessica'. She believes that she was groomed by him and that he deliberately targeted her due to her young age and naivety.

'Alison'

102. 'Alison' was a teacher in the early 1990s when she became involved with the Colin Roach Centre in Hackney. The Centre was named after a man who had been shot dead by police in the entrance to Stoke Newington police station in 1983. It was the base for a number of campaigns against racism, fascism and police misconduct.
103. In around late 1994/early 1995, a man who introduced himself as 'Mark Cassidy' joined the group of volunteers working with the Centre. He claimed to be from a

⁸ <https://www.ucpi.org.uk/publications/special-demonstration-squad-tradecraft-manual-and-related-documents/>

working class background in Birkenhead and worked as a joiner in a firm in South London.

104. In Spring 1995, 'Alison' began a relationship with Mark. Within a year, Mark had moved into 'Alison's' flat and they were extremely close, rarely spending a night apart. 'Alison' was very much in love and believed Mark to feel the same. He got to know her family, often attending family gatherings and significant events as her partner. To this day, 'Alison' has to see Mark's face staring at her from her mother's wedding photographs.
105. Alison did not get to meet Mark's family. He claimed that his father had been killed by a drunk driver when Mark was 8 and that he was estranged from the other members of his family.
106. During the time that they were together, Mark became a member of UCATT and was active in rank and file trade union activism. He also became involved in anti-fascist action ['AFA'] and a group connected with them called Red Action. He had attended meetings of a group called Republican Forum and had an interest in the politics of Northern Ireland. On one occasion, 'Alison' travelled to Northern Ireland with Mark and other members of the Colin Roach Centre to attend a West Belfast festival during the ceasefire, but she did not continue any involvement with the cause of Irish republicanism.
107. In 1997, Mark was centrally involved in debates that led to a split within the Colin Roach Centre which 'Alison' thinks contributed to its closure.
108. After some years together, 'Alison' wanted to have children, but Mark was resistant. This led to them attending Relate counselling. In December 1999, Mark received a message on his pager, which he told Alison was from his boss telling him to call a priest in Birkenhead, who informed him that his grandfather had had a stroke. Alison wanted to go to Birkenhead with Mark, but he insisted that he had to go alone. When he returned a few days later, he appeared depressed. He told 'Alison' that he had to

start work on a job in Luton and apparently commuted there each day from their home together. He appeared to be becoming increasingly depressed and withdrawn.

109. At the end of March 2000, Mark suddenly moved out, taking all of his belongings with him, leaving only a note. Alison was distraught, but managed to reach Mark by phone. He agreed to return at the weekend to talk to her. He returned a few days later and stayed for approximately a fortnight. During this time he appeared twitchy, constantly looking over his shoulder as though he was being watched. At one point, 'Alison' was convinced that a car was following them, but Mark told her to 'take no notice'.
110. On 10 April 2000, Mark disappeared again, leaving another note, apologising for leaving her. He left a couple of messages for some of their close friends asking them to 'look after ['Alison']'. 'Alison' received a couple of short emails from Mark, a post card from Germany and a letter, but then he was gone.
111. 'Alison' who was utterly bereft, quickly came to realise that she had no way of tracing Mark. In her address book, he had scrubbed out all of the phone numbers and contact details for anyone connected with him.
112. Then, after a conversation with another activist soon after Mark's sudden disappearance, 'Alison' began to suspect that Mark was actually a spy. She recalled an occasion on which she had found a credit card in his jacket with the name 'M Jenner' on it. Mark had been embarrassed and said that he had been really stupid and had got it off a man in the pub. He had made 'Alison' promise not to tell anyone about it. 'Alison' began researching his background and the methodology of the security services and later engaged a private investigator in an attempt to discover who Mark had really been. The investigator concluded that 'Mark Cassidy' had never really existed.
113. 'Alison' became deeply suspicious, believing she was being monitored and that on more than one occasion was being followed. She was convinced that the man she had known as 'Mark Cassidy' was a state operative and she was in possession of classified

information. With very few exceptions, her friends and family thought she had lost touch with reality.

114. In January 2011, after a decade of searching and wondering, the story broke about Mark Kennedy having had relationships with activists. It proved to 'Alison' that her suspicions about Mark were not beyond the bounds of possibility. In the autumn of 2011, a journalistic source confirmed to her that 'Mark Cassidy' was in fact an undercover officer called Mark Jenner. However, the MPS continued to 'neither confirm nor deny' that this was the case. 'Cassidy' was finally publicly confirmed as Mark Jenner, when the UCPI refused his application for restriction of his real name in April 2018.
115. Throughout Jenner's five-year relationship with 'Alison', he was married with children, one of whom was born a few months after he had started the relationship with 'Alison'.
116. 'Alison's' ability to trust other people has been severely undermined by her experience with Mark. She suffered years of paranoia and had to endure being disbelieved by her family and friends. Her relationships and career have suffered significantly.

'Jenny'

117. In the late 1980s and early 1990s, 'Jenny' was involved with the Socialist Workers Party ['SWP'] and the Anti Nazi League ['ANL']. In 1992 or 1993, she met 'Bobby Lewis' – the same man who had had a relationship with 'Bea' – see [90 - 93] above. 'Jenny' and Bobby became good friends and regularly went on demonstrations together. On an evening in or about 1995, 'Bobby' told 'Jenny' that he was leaving London to reconcile his relationship with his ex-wife in Spain. In the emotion of that last evening together 'Jenny' and Bobby ended up back at his home where they went to bed together. In July 2019, 'Jenny' discovered that 'Bobby Lewis' had been a UCO when she saw a photograph of him on a friend's Facebook feed. She was incredibly shocked and distressed.

'Monica'

118. In October 1995, 'Monica' moved to London from Lancashire and became actively involved in Reclaim the Streets, a direct action pressure group influenced by ideas of positive social change and a move to sustainable and environmental values. In January 1996, a man known as 'Jim Sutton'⁹ began attending the Reclaim the Streets meetings. He was introduced as 'Hunt sab Jim'. He became active in the group and was particularly useful for an organisation that was largely anti-car, because he owned a van and was able to offer lifts to other activists. Jim became part of the core inner group that was mostly responsible for organising direct actions and other political activities.
119. Following an action in April 1997, 'Monica' and Jim became romantically involved. They had an intimate relationship which lasted approximately six months. They attended public events together as a couple, including Glastonbury and the Earth First! gathering.
120. 'Monica' ended the relationship in October 1997, though Jim made efforts to maintain it. Within a couple of months he had started a new relationship with another activist, 'Ruth'. 'Monica' remained good friends with Jim, but lost touch after she moved to Brighton in around January 1999.
121. In January 2011, 'Monica' learnt that Jim had been an undercover police officer. The news came out as a result of an interview in the Guardian newspaper with 'Rosa' - see [153] below.

'Ruth'

122. 'Ruth' was involved in social justice and environmental politics from the late 1980s. In around 1993, she joined a campaign to stop the expansion of the M11. The M11 campaign became 'Reclaim the Streets' and 'Ruth' became involved in that campaign.

⁹ This is the same 'Jim Sutton' referred to at [77] above in Helen Steel's case; at [123] below in relation to 'Ruth'; at [127] below in relation to 'Rosa'; and [183] below in relation to Kate Wilson.

123. In around 1996-1997, she met 'Jim Sutton'¹⁰, who, at the time, was in a relationship with 'Monica'. Soon after Jim's relationship with 'Monica' ended, he started a relationship with 'Ruth'. It soon became serious and steady. It was 'Ruth's' first really significant relationship. They were together three or four times a week, usually staying together either at his place or hers. 'Ruth' introduced Jim to her family and wider circle of friends. They went on holiday together a number of times and were generally seen as a couple at social gatherings, as well as regularly attending political meetings together.
124. 'Ruth' describes the relationship as good and positive, however, she sensed that Jim was holding back and was reticent about disclosing too much about his own personality and commitment. Eventually, in July or August 1999, 'Ruth' gave him an ultimatum to either commit more fully to the relationship or they would separate. Jim became very distressed, but was unwilling to commit. 'Ruth' therefore decided to end the relationship and to end all contact with Jim. In order to achieve that she had to withdraw from some of her friendships and activist politics. 'Ruth' was surprised when within a couple of months of their relationship ending, Jim had started a new relationship with 'Rosa'. For 'Ruth' her relationship with Jim had been a significant one and the breakup had been very painful. It took her at least two years before she was able to be involved in another relationship.
125. In subsequent years, she heard rumours that Jim may have been an undercover police officer, but had always dismissed these as complete nonsense. She learnt that they were true in January 2011, when she was told that 'Rosa' was about to tell her story to the Guardian newspaper. 'Ruth' was pleased that 'Rosa' was willing to speak out, but could not face doing so herself at that time.

'Rosa'

¹⁰ This is the same 'Jim Sutton' referred to at [77] above in Helen Steel's case; at [118] in relation to Monica; at [127] below in relation to 'Rosa'; and [183] below in relation to Kate Wilson.

126. 'Rosa' is a politics graduate, with a masters in Political Theory. She has always felt a strong obligation to stand up to injustice, to assess events around her and to value a connection with nature. She became vegetarian at age 11 and vegan at age 20. She joined the anti-apartheid movement in her mid-teens. Since entering university, she has been active in campaigns around animal rights, environmental, anti-racist and social justice issues. Her political activism is central to who she is.
127. At the end of the 1990s, 'Rosa' met 'Jim Sutton'¹¹ through Reclaim the Streets. On 23 November 1999, they started an intense intimate relationship. Initially, 'Rosa' tried to end the relationship as she was not comfortable with the extent of the intensity. However, Jim dissuaded her, claiming that he felt relieved to hear that as he too had had the same fears, that everything would be fine and that he felt it was as if they were soulmates. Within a very short period of time 'Rosa' thought she *had* met her soulmate. She now understands this was as a result of his training in 'mirroring'. She also believes that Jason Bishop passed on information to Jim that she had shared with Bishop prior to meeting Jim [see paragraph 259 below] and Jim used this in an attempt to increase their emotional connection. As a result of the seemingly significant nature of the relationship with Jim, Rosa changed her plans and rejected the offer of a quarterly guest editorialship post in the green European youth magazine, 'Green Pepper', as she felt it was too soon for them to be in a different country from each other.
128. In February 2000, at Jim's suggestion, 'Rosa' moved in with him, initially only for a short time so that he could nurse her while she had flu. But at the end of the week, Jim insisted she move in, that she would be there all the time anyway, this way she would have her belongings there when she needed them.
129. Their relationship appeared to blossom. Their time between their political commitments was spent as a couple, sensuously, cooking together,

¹¹ This is the same 'Jim Sutton' referred to at [77] above in Helen Steel's case; at [123] below in relation to 'Ruth'; at [118] above in relation to 'Monica'; and [183] below in relation to Kate Wilson.

playing in the park and each seeming to grow as a person in light of learning from the other.

130. One day, in May, out of the blue, Jim came home and told 'Rosa' that he needed 'to sort his head out' and that he planned to go travelling alone that September. Despite being deeply hurt, 'Rosa' accepted that it was the right thing for him to do. Nonetheless, at Jim's instigation, they discussed their future together, children and areas in which to settle on his return. They left a week early for the Earth First! gathering in Snowdonia in June 2000 at Jim's suggestion, to travel through the country of her family's heritage to check out areas they might like to move to.
131. However, as time passed, Jim's behaviour had become erratic: on occasions he would hug 'Rosa' tightly saying 'I never want to lose you' and on other occasions he behaved in a bizarre and sometimes abusive manner towards her. He then disclosed that he had been adopted and that as a consequence he had had a disturbing childhood. He implied that this was the reason why he sometimes behaved badly. When September came, Jim told 'Rosa' that he was going to travel to Turkey and from there he planned to hitchhike to South Africa. He said that he needed to sort some things out on his own before they continued living together.
132. 'Rosa' was finding Jim's push and pull so hard, an old University friend offered her to stay in Cyprus with their family over the period Jim was leaving. She eventually called Jim just before he left. Jim was agitated with a heightened sense of security, suggesting she should not have called him from someone else's phone. He said he would call her from Turkey when she was home in London. Jim later contacted 'Rosa' from Turkey. He was distressed and in tears but claiming he was so heartened by their conversation and the fact that she still loved him that he would send a happier postcard that day and asked if he could call her in a couple of days. He stated that he was about to hitchhike to Syria. However, after that she did not hear from him. 'Rosa' became extremely worried for his safety. She started to suffer from anxiety, depression and panic attacks, for which she sought counselling. She contacted the Foreign Office to express concern about Jim's safety. They informed her that they had

no record of him leaving Istanbul. They told her that the Turkish authorities would be in control of investigating his disappearance.

133. 'Rosa' tried to make contact with Jim's family, but could not locate them. She tried to find him by other means, including looking for his birth certificate for clues, but she could find no trace of him. At this point 'Rosa' called back the Foreign Office and said that Jim had been located safe and well, as she was terrified he could be on the run from the state and that she had just told an arm of it where he was headed. As part of her searches, 'Rosa' obtained Boyling's phone bills and made phone calls to the numbers which were not identifiable by close associates in their political circles. Unbeknownst to her, these numbers were for police officers, one of whom was Jim's handler. One of the calls was answered by someone who sounded panicked and demanded to know how she had got the number. The other call was answered by someone who denied knowing Jim, but who took a lengthy message, because he said he might later realise that he knew him.
134. 'Rosa' then received a letter from Jim from Kenya, followed by a postcard, in which he said that he would set up a new email address for himself. He subsequently sent a series of emails over the course of 2000 and 2001 from this address. The emails stated that he was still in love with her, that he had been forced to leave her against his wishes, that he was not 'acting freely', that he was not coping well and that he hoped they would meet again. Jim advised her not to discuss issues on the phone, or tell anyone of their contact, explaining that otherwise it would make it difficult for him to contact her again. She grilled him about what was going on in her return emails, but only received riddles back and no explanations. Eventually she cut contact with him due to the strain affecting her physical health. However, she carried on searching, spending days at a time in the British Library searching through electoral records, tracking on foot areas he had taken her to, phoning public and private bodies who held information, such as councils, searching for leads of anyone he had mentioned. She trawled the family records centre for months but found no one who could be him. He had seemingly never been born. Through this period, 'Rosa' had dropped out of her movement, no longer trusting she could know who anyone really was.

135. 'Rosa' tried to fill any time in her waking hours, not used searching, with intensive activity to manage her psychological symptoms. She received counselling and when her Counsellor gave her hope that Jim was a good person in trauma, she began emailing him again. He answered within half an hour, something he claimed was somehow mystical. He was full of mixed messages of having moved on, but being unable to ever move on.
136. This was July 2001 and Rosa was so worried about Jim that she travelled to South Africa, where Jim's emails had last stated he was. One line of investigation suggested that he had become caught up in international drug smuggling. She also needed answers as to what had just happened to her life, if she was ever to have closure. Jim emailed her saying 'Please go home, ['Rosa'] you will not find me in RSA. You will be closer to me in London'. However, 'Rosa' did not believe him, as he seemed to be 'on the run' from something and kept searching in South Africa, taking many risks with her safety. She received further emails from Jim, including one saying that he needed her to 'keep writing [to him]. I need to know where you are even if I can't touch you'. Rosa now believes that Jim and his superiors wanted her to keep emailing him so that they could keep a track of her movements.
137. 'Rosa' then found out through a contact she'd recently made in South Africa that Jim was accessing his emails in England and she immediately returned to the UK. On her return, she was unable to cope with even simple things, like names on Underground station signs. She was traumatised and suffering from paranoia to the extent that she feared for her life, due to a perception that an unknown entity was trying to track her while she tracked Jim.
138. 'Rosa' continued to try to find Jim, financed by the last of her savings. Eventually, she managed to discover that Jim's real name is Jim Boyling. She identified the school that he had gone to and obtained details of his true relatives. By this time (November 2001) she had lost so much weight, she weighed less than 7 stone. She was scared to make contact with anyone she knew.

139. She researched the telephone numbers that she had called from Jim's mobile phone bill and was informed that they were blocked government numbers. She nonetheless managed to find the details of an address associated with one of the numbers. On 3 November 2001, she went to the address, which was a small warehouse in Camberwell with opaque barred windows. She sat outside, recording the number plates of vehicles which appeared to be associated with the premises.
140. 'Rosa' did not know this at the time, but she had managed to find the premises out of which the SDS operated. She did, however, work out that the building was part of some kind of state surveillance operation related to British civil society. She did not know if Jim was running from them, or being obliged to stay within their organisation, but she felt that even the knowledge that she had managed to acquire to date placed her life at risk.
141. Two days later, on 5 November 2001, 'Rosa' started working in a bookstore. On her very first day at work, Jim walked into the shop. It is clear that 'Rosa' had come too close to finding out about the SDS and uncovering the truth and that Jim was sent to stop her. They arranged to meet that evening. She now believes the location was chosen for good visibility for one or more of his colleagues. Jim disclosed to 'Rosa' that he had in fact been an undercover police officer and he told her his real name. He said, however, that he had, from the moment he had entered the groups that he had infiltrated, shared their values. He told 'Rosa' that he was very much in love with her and that he wanted to continue their relationship. He claimed he had tried to protect his fellow activists, hiding information from the police, undertaking actions they didn't know about because it was what he stood for. He insisted that he was the only person placed in the movement, and had been placed for an apolitical investigation, insisting that the movement was safe, but that he lived in fear of his work finding out who he really was [inside, politically], and that they would destroy him if they found out. He said that he was being forced to live a false life forever in their shadow, was desperate to escape, but could not do it alone.

142. 'Rosa' had been de-stabilised by over a year of searching and by her extreme fear that she had chanced on some kind of malevolent secret state organisation. She believed what Jim was telling her and agreed to help him escape and start a new life. She moved in with him, pending their departure. By this point it was just her and her rucksack, and within two weeks she became pregnant.
143. Jim insisted that 'Rosa' destroy all record of her activist past, claiming they were at risk of being aggressively raided by the police at any time, because of their relationship and them seeing he had betrayed them. He oversaw the disposal of all pages of her address book that contained contact details for her activist friends and in January 2002, he pressured her to change her name by deed poll, saying that otherwise it would not be safe for her to seek medical help with the pregnancy in her real name. Their first child, a daughter, was born in August 2002.
144. Despite continual promises to leave the police, Jim continued working for the MPS. He worked in the Muslim Contact Unit alongside former undercover officer Bob Lambert (see [41] above).
145. Save for two occasions in about 2002 and 2003, when they attended Kingston Green Fair, Jim insisted that 'Rosa' should have no contact with any former friends or acquaintances. On the first occasion, Jim had made them suddenly hide behind a tent, because he had just seen another undercover officer, 'Jason Bishop'. Where previously he had claimed there were no other UCOs in the movement, this was the beginning of Jim describing their old world as pitted with UCOs and private informants, warning 'Rosa' that she could not know who anyone was and that she would be picked up by his work's radar before she got to speak to anyone.
146. 'Rosa' was desperate to be part of her old community, with whom she shared core beliefs. She was also desperate to get a message to Helen Steel, especially so once Jim had told her that Helen's former partner, who she had known as 'John Barker', had also been an undercover officer – see [79] above. However, 'Rosa' was unable to spot anyone who could safely pass the message to Helen. Jim told 'Rosa' that she would

not be able to contact Helen without his work knowing about it. He said that Helen's movements were being monitored and gave details of the contents of Helen's luggage that he said she did not even know had been searched. He referred to conversations picked up from phone taps on another friend.

147. In 2004, Rosa's son was born. Over time, Jim's behaviour had become increasingly controlling, erratic and abusive. 'Rosa' wanted to leave him (and had indeed tried on a few occasions), but she was frightened, because she believed that he would be able to track her down and use his status and connections as a police officer. She telephoned Women's Aid for advice, but they confirmed her fears that, because he was a police officer, they could not guarantee that he would not be able to trace her when they changed her name and relocated her.
148. Despite 'Rosa's' increasing concern, Jim convinced her to sign documentation at a Registry Office to marry him. He claimed a lack of commitment on her part was stopping him from turning back into 'Jim Sutton', his real self. 'Rosa' did not find this credible, but she decided to agree to the marriage because if she was wrong, all would be resolved, and if she was right, her guilt for pulling the children from their home if she ran from Boyling with them would be diminished.
149. After the marriage the relationship became even more abusive. 'Rosa' moved to a caravan in Wales with the children in an effort to make Jim keep his promise to finally leave the police and took her birth name back against Boyling's wishes.
150. In December 2006, 'Rosa' and Jim's daughter was diagnosed with a rare, life limiting degenerative disorder which has a very poor prognosis. In January 2007, 'Rosa' learnt that her son also suffers from the same disorder. Following this news, Bob Lambert, who was at the time, Jim's manager, and long spoken of by Jim for his role in the SDS and in the Muslim contact unit, made what Jim described as a 'welfare visit' to their home, together with another colleague from the SDS, a man called Noel. 'Rosa' had already learnt from Jim that Noel was the man who had taken the message from her when she had been trying to find Jim back in 2001. Noel told 'Rosa' to contact him if

she had any concerns about Jim's behaviour. However, when she subsequently did so, the conversation turned sinister. He made it clear that should she ever speak out, it would not only be Jim's word against hers, but the weight of Special Branch's also. She now believes the invitation to call was an early warning system set up by Lambert as part of their containment exercise.

151. Over the following months, Jim's behaviour deteriorated even further. In February 2007, 'Rosa' fled with their children to a refuge. However, under pressure from Social Services, who were involved because of the children's care needs, 'Rosa' eventually telephoned Jim. Jim claimed an epiphany and 'Rosa' ended up back in the family home. Initially Jim claimed he would go on a programme for abusive men, but later mocked 'Rosa' for suggesting he would ever do such a thing. Eventually, he agreed to a separation and in January 2008 he commenced divorce proceedings. Through this period Jim applied all his training and experience in deceit and manipulation to manipulate Social Services on whom 'Rosa' and her children were dependant on account of their diagnosis.
152. In July 2010 'Rosa' took a risk to confide in someone who lived near her and who had been in her movement despite her suspicion that he might be a police officer. She wrote a letter and asked for it to be passed to Helen Steel. Helen then visited her in the Autumn with mutual friends. Helen raised that she thought they should consider taking a group action legal case. 'Rosa' agreed to be part of it, given the need to do something about the police practices.
153. In mid January 2011, following the exposure of Mark Kennedy in the national news and the false impression given that he was a single rogue officer, Rosa agreed to speak to the Guardian Newspaper which published an article about her case. Following publication, Rosa was contacted by the MPS' Professional Standards Department. She later gave an interview regarding Boyling's actions as part of Operation Herne.
154. Jim remained a police officer with the MPS until he was finally sacked in 2018, following police disciplinary proceedings, which found him guilty of Gross Misconduct

in respect of his relationship with 'Rosa'. 'Rosa' provided evidence for the hearing. 'Rosa' was allowed to view a highly redacted yet nonetheless shocking bundle of documents containing Boyling's, other SDS officers', and managers' witness statements. As part of the announcement of their findings the panel read the contents of two files that Boyling had submitted about her to his SDS supervisors. He had submitted the first just before he moved her into his flat, referring to her as a 'significant organiser' of an event he was targeting and the second in the heyday of their relationship also referring to her as a political organiser. The Tribunal panel noted that these files were inconsistent with his evidence in which he stated that Rosa was an apolitical waitress who was not a target of his investigation. The experience of the misconduct proceedings was deeply traumatising.

155. The impact of these decades of events on 'Rosa' has been profound. She has suffered from very significant psychiatric injury and her ability to engage in political activity – previously a central part of her identity – has been irreparably damaged. She is unable to develop social or intimate relationships. She grieves for the loss of the person she was before she met Jim and her connection to the beauty of the world. She feels locked out from this as a result of the need to numb her emotions in order to lock out the trauma and make sure she is strong enough for her children. Her two children born out of the state operations require 24 hour care, on a more than 1:1 basis, so they have live-in carers, in addition to full time support from her. She feels a strong sense of injustice for the lack of acknowledgement of the harm done to all of her children's lives. For her older two born of the police spying operations, from the years lost in isolation and abuse, and the robbing of their worlds, to a precarious care situation with only one adult family member to manage their high needs and for the consequential loss of opportunities and integration in the time they have left. For her youngest, born of a donor as another relationship could not be possible again, for the sense she lives with, of threat and injustice from the state, for carrying the consequences of the police spying operations, including tending and taking responsibility for her siblings. Her opportunities are profoundly affected and she lives with the multiple effects and the toll it has taken on her mother. Rosa wonders to

what extent the Inquiry has begun to grasp the depth and vast nature of the ramifications of the state operations?

'Wendy', 'Sara' and 'Ellie'

156. In the mid 1990s, 'Wendy' started attending animal rights demonstrations and occasionally protesting against fox hunts with her local hunt sab group. In 1997, she became a committed member and went out with the group most weekends to protest against fox hunting. Some time after this, 'Wendy' met a young woman called 'Ellie' at work. They quickly became friends and later flat mates. They continue to be close friends and share a house to this day.
157. At around the same time that 'Wendy' began regularly going out sabbing she got to know another member of the group, 'James Straven'. He was well spoken and always had plenty of money. He drove a Land Rover Discovery. He and 'Wendy' became friends. Their friendship was further cemented in 2000, when 'Wendy' experienced a time of acute emotional difficulty and James provided much support. 'Wendy' considered James to be one of her closest friends, someone she could confide in and trust wholeheartedly.
158. Sometime around 1998, James told 'Wendy' that he was interested in 'Sara', who had recently become involved in the group. 'Wendy' put in a good word to 'Sara' about James and encouraged her to start dating him.
159. James and 'Sara' began to see each other during the winter of 1998. James told 'Sara' that his family was from Scotland and that he had an army background. He claimed to now work as a location manager for the film industry, which involved travel and regular absences. He told 'Sara' that he had three children with an ex-partner.
160. The relationship was very affectionate from the start and after a few months, it became intimate. They saw each other at least a couple of times a week and 'James' regularly spent the night at 'Sara's' house. They also went away together for day and weekend trips. They did not attend the same animal rights meetings, but attended demonstrations and went out sabbing and to stop shoots together. When either of

them was away with work they stayed in regular contact via phone, texts, email and postcards. 'Sara' felt that they had a very strong connection and was deeply in love with 'James'. At the time she believed that the feelings were mutual. She envisaged a future with him.

161. Over Christmas 1999, 'Sara' did not hear from 'James' for two weeks, despite repeated efforts to contact him. This had never happened before and caused her considerable distress. When she eventually managed to contact him, he came to her flat and handed her a letter, in which he said that he had difficulty maintaining intimate relationships for long periods of time due to traumatic childhood experiences. He told her that his best friend at boarding school had committed suicide after being raped by the headmaster. 'James' told 'Sara' that, despite thinking the world of her and wanting to maintain their intimate relationship, he could not maintain a sexual relationship. 'Sara' was shocked, but given her depth of feelings for 'James' agreed to proceed on the basis of a close platonic relationship. They remained close and 'Sara' harboured the hope that 'James' would overcome his difficulties with time.
162. At some point, 'James' told 'Sara' that his ex-partner might be moving to America and that he would have to relocate there too, in order to be near his children. As time went on 'Sara' began to lose hope of rekindling their intimate relationship. She sought help from friends and despite his having asked her not to, discussed the letter in which 'James' had disclosed his problems. This caused her terrible feelings of guilt which she continued to carry until she discovered that he was an undercover police officer in 2018.
163. Realising that the relationship was not going to recover, Sara decided to move away. She left her job, sold her flat and moved to Italy in March 2001, which 'James' encouraged. 'She and 'James' remained in contact and made plans for him to visit. However, very shortly after she had moved, 'Sara' learned that 'James' had begun a relationship with 'Ellie'. 'Sara' was very shocked and confused. She could not understand why he had ended their relationship, purportedly due to sexual

difficulties, yet had started a new one. It didn't make sense and caused Sara a lot of pain. She emailed 'James' about it, but he did not reply and 'Sara' never heard from him again.

164. Meanwhile, James had remained friends with 'Wendy' and had asked her whether she would set him up with her good friend 'Ellie'. 'Ellie' was not an animal rights activist, but James had met her in passing through 'Wendy'. 'Ellie' was 21 years old at the time. 'Ellie' and James formed a relationship, which she thought was loving and monogamous. Some of the time James was away, but 'Ellie' understood he was either visiting his children and or away for work.
165. After 'Ellie' and James had been together for approximately 10 months, James told her that he might have to move to America, because his ex-partner was moving there with their children – the same line he had previously given 'Sara'. A month or so later, in early 2002, he told her that the moving plans had progressed more quickly than expected and he left soon after. 'Ellie' had understood the relationship to be a long-term one and was very upset.
166. After James had left, he and 'Ellie' continued to stay in touch. They also met up a couple of times a year when, as 'Ellie' believed to be the case, James was back in the UK from the US.
167. In 2005, 'Ellie' and 'Wendy' moved overseas, so she and James did not see each other so frequently, but remained in email contact with one another and met every couple of years when 'Ellie' was in the UK. The meetings were platonic, except for one occasion in 2015.
168. In April 2018, 'Ellie' received a telephone call from James from an Egyptian number. He confessed that when they had been together in 2001-2002, he had been an undercover police officer working for the SDS. He explained that there was a public inquiry going on and that someone would probably be in touch with her about it. He appeared to be negative about the Inquiry, which 'Ellie' believes was an attempt to

discourage her from getting involved. James told her to delete the Whatsapp messages and emails they had exchanged. 'Ellie' subsequently learned that James has twice made false statements in signed witness statements submitted to the Inquiry. First, in seeking to persuade the Inquiry to grant him a restriction order preventing his cover name from being disclosed, he denied conducting a sexual relationship in his cover name with named women during his deployment – one of whom was 'Ellie'; another was 'Sara'. Then, when he subsequently admitted to his relationship with 'Ellie', he asserted in a further signed witness statement that all he could provide by way of contact details for her was "a guess at an old email address". That statement was dated 17 April 2018, around the very time that he had telephoned 'Ellie' to inform her that he had been a UCO.

169. Both 'Ellie' and 'Sara' were devastated by the end of their relationships with 'James' and very shocked and distressed to learn that he had been an undercover police officer.

170. 'Sara' learnt the truth about James in August 2018, when she received a telephone call informing her that there was a letter for her from the Home Office relating to her past. The male caller asked her to return home so that he could give the letter to her in person. The letter was from the UCPI and it informed her that the man she had known as 'James Straven' had been an undercover officer between 1997-2002.

171. James had also kept in touch with 'Wendy' over the years, exchanging emails and meeting up with her almost every time she returned to the UK to visit, until she discovered that he was an undercover officer in April 2018.

Donna McLean

172. Donna was formerly known in the Inquiry by the pseudonym 'Andrea'. However, she has now waived her anonymity and this opening statement is made on her behalf in her real name.

173. Between 2002-2004, Donna was in an intimate relationship with a man she knew at the time as 'Carlo Neri', but whose real name she subsequently learnt to be [REDACTED].
174. Donna met Carlo on an anti-war demonstration in September 2002. They immediately hit it off and started an intimate relationship later that night. Within six weeks, Carlo had moved into Donna's flat. He quickly integrated into her family and told her that he wanted to have a child with her. On New Year's Eve 2002/2003, he asked her to marry him and she agreed.
175. Carlo told Donna that he had a son with another woman and that that relationship had been a fling. Carlo said that his son was in Cornwall and led Donna to believe that when he went away for short periods he was going there.
176. In September 2003, Donna and Carlo's relationship began to deteriorate. Over Christmas that year, Carlo told Donna that he was going to Italy to visit his family, because his father was ill. He phoned Donna in early January 2004 to say that his return was delayed because his father had died.
177. Carlo also told Donna that there was a history of domestic abuse in his family and that he had previously suffered suicidal behaviour and depression. He told her that his sister, to whom he was very close, had been abused by their father and this was really distressing him. Donna was convinced he was in the process of having a breakdown. He became very volatile and started distancing himself from her physically and emotionally. At one point he sent a text from Italy saying he was suicidal and was going to kill himself. He then disappeared for a week, which caused Donna great anxiety. When he got back in touch, Carlo told Donna that he had been in jail in Italy for urinating on someone's car.
178. By this point Donna, who had significant experience through her work of dealing with people with mental health problems, was beginning to have doubts about some aspects of Carlo's account.

179. In May 2004, Carlo told Donna that he was going to move out. He left and went to stay with Steve Hedley (a trade union activist who also has CP status in the Inquiry) and a number of other activists. Donna remained in touch with Carlo and, in fact, their intimate relationship resumed for a period of about five to six months until November 2004 when he told her he had to end it.
180. In 2013, Donna read the book 'Undercover' by Rob Evans and Paul Lewis and was struck by the similarities between the pattern of behaviour of some of the officers involved in the relationships described and that of Carlo. She later went to see a play by Mark Thomas, which included extracts from accounts by two women who were in intimate relationships with undercover police officers and was again struck by the similarities with her relationship with Carlo. Finally, in the summer of 2015, she was contacted by an old friend who put her in touch with Dave Smith from the Blacklist Support Group (who also has CP status in the Inquiry). Dave informed her that there were suspicions that the man she had known as 'Carlo Neri' was in fact an undercover officer.
181. Donna, together with other activists and the Undercover Research Group subsequently discovered that 'Carlo Neri' was in fact [REDACTED] and, that at the time he had been in a relationship with Donna, he was married and had a 2/3 year old child. He had a second child in 2005, shortly after he disappeared from Donna's life. He is also now known to have deceived another woman, 'Lindsey', into a relationship whilst undercover in 2001-2002. 'Lindsey' is also a core participant in the Inquiry.

Kate Wilson

182. Kate Wilson has a long-standing involvement in political campaigns in the fields of environmental and social justice. She has no convictions of any sort and yet she now knows that, since the age of 20, she has had at least six undercover officers involved in her life; two of whom formed part of her most intimate life, including her home and family circles. She may, of course, have had contact with others whom she does not yet know were UCOs. Through her pursuit of a claim in the Investigatory Powers

Tribunal she has received admissions by the police that the sexual relationship she had with Mark Kennedy violated her Article 3, Article 8 and Article 10 rights, and that the actions of *all* the officers – not only the sexual relationship – were in breach of her ECHR rights under Article 8.

183. In 1998, Kate took a year out from her university degree and moved to London to focus on political activism. She was part of Reclaim the Streets, where she came into contact with Jim Boyling (see [118] above) and 'Jason Bishop', who is now also known to have been a UCO. She then returned to Oxford to complete her degree, but continued her involvement with London Reclaim the Streets and Earth First!
184. Kate's boyfriend at the time lived in Nottingham and she began to spend a lot of time visiting and made some close friends there. These friends introduced her to 'Rod Richardson' (also a UCO) and, in July 2001, Rod moved into the housing cooperative where most of Kate's friends lived. Rod would join Kate and her friends for 'family' dinners together in the house and go out to the bar in the local activist social centre, or to parties.
185. In 2003, Kate attended the Earth First! summer gathering and focused on mobilizing people for the G8 Summit that was due to be held in Gleneagles in 2005. In October 2003, she moved to Nottingham permanently and quickly became romantically involved with a man who gave the name 'Mark Stone'. They met at a meeting of the Nottingham Network for Social Environmental Activists [Sometimes called 'NASA'].
186. Mark told Kate that he was from Battersea, which was near to where Kate had grown up. He claimed to love the traveller lifestyle and country music – both of which were interests that Kate shared. Kate was a little wary at first and pressed him for further information about his past. He told her that his mother lived in Ireland and that his father had abandoned him when he was very small. He claimed that this was all very traumatic. He said he worked for his uncle who had a van company, based in Bristol. He also told her that he had been involved in drug smuggling in the past and was now scared of his past catching up with him. He told her that he had moved to Nottingham

to be near Stanage Edge, where he could go climbing, which he claimed to be his biggest passion.

187. Mark became very romantic and attentive towards Kate. He took her out to dinner, bought her gifts, took her to beautiful places to go rock climbing and she felt that they were very much in love. Their relationship became very close and intense. Mark visited her in Barcelona in April 2004 for a romantic holiday (this 5-day overseas deployment appears to have been unauthorised); and he met, and grew close to, Kate's family. He claimed that they were the parents he had never had. He bonded with Kate's brother and attended her grandmother's 90th birthday party. Mark and Kate moved in together in a shared house in July 2004.
188. During the time that they were together, 'friends' from his 'old life' in London came to visit him. Even at the time, Kate and the other house mates joked that these friends 'looked like cops'. The 'friends' were certainly aware that Kate and Mark were in an intimate relationship. Mark also made a fairly clumsy attempt to set one his 'friends' up with 'Jane', one of his and Kate's house mates.
189. Mark and Kate were both very politically active in a range of national and international political groups. They were involved in 'actions' together including a protest in Dublin on May Day 2004, which Mark was heavily involved in organising. He delivered a large number of motorcycle helmets to a squat, but then arranged for him and Kate to stay elsewhere, so they would 'be more comfortable.' The squat was raided the next morning and the occupants arrested. Two days after the protest, Mark and Kate were also both arrested by Irish police and kept in police custody for 5 hours, during which time Kate was strip searched three times and threatened. Then, totally unexpectedly, they were both released without charge.
190. During this period, Kate also visited Brighton, as she had close friends who were involved in running a social centre called the Cowley Club there. There, she met a man whom she now knows to have been the undercover officer known as 'Marco Jacobs', who had intimate relationships with at least two activists during the course of

his deployment, and whom she met on numerous other occasions both in the UK and abroad.

191. In the second half of 2004, both Mark and Kate started intimate relationships with other people, in Mark's case, with 'Lisa' – see [198] below. However, they also continued their relationship with each other. This overlapping of relationships was consistent with Kate's belief in open relationships, at the heart of which lies trust and honesty.
192. By early 2005, the sexual side of their relationship had fizzled out, but they remained close friends. Kate decided to leave Nottingham and return to travelling. In February 2005, she moved out of the house and told Mark that the relationship they had would be difficult to maintain while she was away. Mark claimed to be devastated and persuaded her to remain close friends, which they did over the following years. Mark described their ongoing relationship as 'like brother and sister' and he would visit her when she was living abroad and he remained in close contact with her family.
193. In the summer of 2005, Kate returned to the UK to participate in the protests against the G8 summit, as a first aider. During the mobilisation, she met and worked with a woman she knew as 'Lynn Watson', who was a core member of the UK Action Medics Collective and who has since also been discovered to have been a UCO.
194. In 2006, Kate was present at a protest outside Drax power station, during which Mark was severely beaten by the police. She arrived to find him so badly beaten that she did not recognise him at first. She refused to leave him when he was placed in a police van and as a result, was arrested for obstructing the police.
195. Over the years, Mark would continue to visit Kate at her home in Berlin, Germany, as well as meeting her in the UK and at international political gatherings around Europe. They also maintained contact by phone and email. During this time, while Kate was living overseas, Kennedy was her main contact with friends in the UK. He was the person who maintained the most regular contact with her and in some ways mediated her other friendships. He made sure that he was a central emotional support in Kate's

life and implied that she played the same role in his. The subtext of their friendship was always that she had broken his heart by ending their relationship. This was reflected in his spoken and written communication, which was very loving, often romantic and sometimes sexually tinged. As a result, not only did Kate maintain an intense connection with Mark, but she also continued to feel guilty about her decision to end the romantic aspect of their relationship.

196. Kate learnt via phone call on the morning of 21 October 2010 that Mark was in fact an undercover police officer whose real name is Mark Kennedy.

'Lisa'

197. 'Lisa' is a good friend of Kate's. Like Kate, she has been involved in environmental and social justice political activism for all of her adult life. It was a central feature of her life after leaving university and the source of the majority of her friendships and relationships in her 20s and 30s.

198. In September 2004, 'Lisa' began a romantic and sexual relationship with the man she then knew as 'Mark Stone'. The relationship began slowly but became serious and committed. 'Lisa' was in another relationship at the time, but was 'swept off her feet' by Mark who eventually became her primary partner. She knew that Mark was in a relationship with Kate. However, like Kate, she held the view that open relationships were a positive thing provided they were built on complete trust and honesty.

199. In the summer of 2005, Mark became heavily involved in the organising of a camp outside the G8 Summit in Scotland. He was involved, in particular in the organisation of transport for protestors and became known as 'transport Mark'.

200. In July 2005, 'Lisa' and Mark travelled together to Iceland to join other activists campaigning against the building of a hydro-electric dam and aluminium smelter there. Whilst there, their relationship intensified and they shared a tent together on the camp for three weeks.

201. In the following years, their relationship became very close, 'Lisa' believed she had found a deep long-term connection, and increasingly that they would share a long-term future together. She introduced Mark to her family and, in 2006, when her father died, Mark came with her to the funeral and sat with close relatives in the second mourners' car. He had a friendship with her brother and played with her young niece and nephew.
202. Mark continued to have sexual relationships with other women, but 'Lisa' and Mark were seen as the primary couple. The fact of their relationship was well-known to everyone around them, including at least two individuals who are now known to have been UCOs, 'Lynn Watson' and 'Marco Jacobs'. 'Lisa' had discussed her relationship with Mark directly with 'Lynn', and 'Lisa' and Mark were seen together at numerous public events over the course of many years, including drinking with 'Marco' at a climate camp. They attended many protest camps and demonstrations together, where they were openly identifiable as a couple, including the G8 protests in Germany, a speaking tour about the Iceland campaign in Spain, climate camps in the UK and Earth First! Gatherings.
203. Over the course of their six-year relationship, Mark would occasionally go away for periods of time, usually stating that he was visiting his brother in the United States, or his mother in Ireland, or away working. Whenever he was away, he and 'Lisa' would stay in constant contact, by email, texts and telephone. They talked to each other almost every day for the entire duration of the relationship. They went on many climbing and walking holidays together and with other activist friends.
204. In around April 2009, Mark was involved in the planning of an action to occupy Ratcliffe-on-Soar power station. A briefing meeting he attended was raided by the police and subsequently Mark's home, amongst many others, was searched by police. After this Mark started to become very agitated and stressed and 'Lisa' spent time caring for his mental and physical wellbeing. Over the following months, Mark appeared to have some form of mental breakdown. He became very paranoid and was always looking over his shoulder.

205. In October 2009, Mark announced that he was going to visit his brother in the US, but did not give any idea as to when he would be back. He sold his car, packed up his house and was in an agitated state. This caused 'Lisa' significant worry. They stayed in regular contact by skype calls the whole time he was away and he visited her once, at the end of November 2009, saying that he'd had to come back from the US for something work related and he asked that she not tell anyone he was in the country.
206. In January 2010, Mark returned and announced that he had bought a narrow boat. 'Lisa' had moved onto a narrow boat the previous January. Together they brought his boat to Nottingham from Lincoln, where he had bought it. Initially Mark did not want to be seen in public, or let anyone know where he lived, but by the end of February 2010 he was beginning to be more comfortable and seemed less on edge about being seen. Mark moored his boat next to 'Lisa's' for the large part of that year. During this period Mark appeared to be depressed and confused about his career options and was exhibiting increasingly erratic behaviour.
207. In July 2010, Mark and 'Lisa' went on holiday together to Italy, where she and Mark attended an animal rights gathering to give a climbing workshop. Mark had not previously expressed an interest in animal rights and this seemed to be a new political interest for him. One day, whilst up in the mountains together, and Mark was on a cycle ride, 'Lisa' found some documents in the glove compartment of his van. One was a passport which had expired in 2008, which was in the name of Mark Kennedy. The passport referred to Kennedy having a dependent. 'Lisa' also found a mobile phone, on which there were messages from what appeared to be two children referring to Mark as 'Dad'.
208. When 'Lisa' questioned Mark about these, he told her that he had previously been a drug smuggler and that his best friend had been killed and he (Mark) had promised to take on responsibility for his friend's two children, who thought of him as their dad. He broke down in tears and told 'Lisa' that it was messy and that he had never been there for them which was a source of constant stress for him. This story was

consistent with things Mark had alluded to about his past over the years, so despite how unbelievable it seems, the story fitted in with his legend and persona.

209. Initially she believed what he had said and felt like they had an increased intimacy because of this shared secret. However, over the course of that summer, various inconsistencies started to appear in his account and further clues about the possibilities of undercover policing activities started to appear. Notably, whilst at an activist gathering, Lisa heard a friend give an account of bumping into 'Lynn Watson' in Cornwall. Lynn had supposedly moved abroad, but she had acted very suspiciously which sowed doubts in people's minds about who Lynn really was. The other incident came at the end of the summer at a festival, where Lisa became aware of the story of 'Jim Sutton' being an undercover policeman, as passed on via 'Rosa' to Helen Steel and then to mutual friends who were expressing shock at the discovery. This was the first time 'Lisa' had heard of a police officer becoming so close to activists and having a long term relationship.
210. However, Mark was by that time trying to convince her that he was devoted to her and telling the truth about his past. They had further holidays together and 'Lisa's' fears began to be dispelled by his efforts to keep her believing in him. She was very torn apart and confused.
211. In October 2010, Mark said that he had to go to the US again to see his brother. Whilst he was away, 'Lisa' confided in a friend about the discovery of the passport and the phone. The friend and 'Lisa' decided to investigate it further using online ancestry websites.
212. 'Lisa' and her friend made some searches under the name 'Mark Kennedy' and also under the names of the children from the text messages. 'With the help of three further friends, more research was conducted and a marriage certificate from 1994 between a Mark Kennedy and Edel Kennedy was found, with the occupation for Mark given as 'police officer'. 'Lisa' also found birth certificates in the names of the two children, which again gave the father's occupation as 'police officer'. 'Lisa' and her friend identified an address in Ireland and a telephone number. One of 'Lisa's' friends

called the number and Mark answered. 'Lisa' then called Mark on his mobile and told him that she knew where he was and that he had to come back to explain himself.

213. Mark came back that night, in the early hours of 21 October 2010, turning up at an address in Nottingham where 'Lisa' and four friends were waiting for him. Mark eventually admitted the truth that he had been an undercover police officer. However, he also said that he was really on 'Lisa' and her friends' side and that he had been feeding the police incorrect information. He claimed that he had left the police in September 2009. 'Lisa' was in complete shock and was deeply distraught. She immediately ended the relationship with Mark. However, over the next couple of days he called her brother on the phone several times saying he wanted to kill himself and that he wanted her family's forgiveness.
214. Following Mark's revelation, activists went public about it on the internet. In January 2011, the trial of protestors who had been arrested during the Ratcliffe-on-Soar direct action collapsed when it was revealed that the evidence of the conspiracy was based on secret tape recordings made by Mark that had not been disclosed at the trial. The story was covered in the media. Mark gave an exclusive interview to the Mail on Sunday in which he denied having 'gone native' and said that his superiors knew where he was at all times. He referred to his relationship with 'Lisa', although he didn't name her. 'Lisa' had to go into hiding as tabloid journalists were pursuing her. She heard that at least one tabloid was offering large sums of money for any stories of women who had slept with Mark. Lisa didn't speak to any journalists at this time and found the exposure of her private life in the public domain extremely traumatising. It was not until meeting other women as part of the legal proceedings that she began to feel strong enough to share her story publicly.
215. 'Lisa' describes this impact of discovering Mark's true identity as having devastated her life, shattered her trust in others and her ability to form intimate relationships. The timing of the relationship was such that it removed her opportunity to start a family. It has affected her self-confidence and removed from her the feeling of being able to participate in political assembly and activity.

216. It is the understanding of 'Lisa' and the women with whom Kennedy was involved, pieced together in the years since, that Mark Kennedy was pulled out of his official undercover work in October 2009 when he said he was going to visit his family in the US. When he returned in January 2010, he was no longer doing so in an official capacity. According to media reports, Mark had been approached in January 2010, by Rod Leeming, who had himself been an undercover officer, monitoring animal rights activists in the 1990s. Leeming had since set up a private security firm, Global Open Limited, and had approached Mark with a job offer. It is not clear when Mark Kennedy ceased to be a serving Metropolitan Police officer or when he took up a position with Global Open but both occurred between January and March 2010. As part of his undercover role for Global Open he used the same 'legend' personality and activist contacts that he had gained whilst working for the police.

'Naomi'

217. In 1999, 'Naomi' had just finished a PhD and moved to a housing co-operative in Leeds, which was a base for community activists. She soon became involved in a number of activist groups around issues including environmental devastation, anti-globalisation, genetic modification and food sovereignty.

218. In the autumn of 2003, 'Naomi' met 'Mark Stone'. In February 2005, she began an intimate relationship with Mark. She did so knowing of 'Lisa' and Kate's relationships because, like them, she shared their philosophy that open relationships based on trust and honesty were a good thing. Her relationship with Mark quickly became very intense. In May 2005, they went on holiday together. In June 2005, Mark attended 'Naomi's' brother's wedding and met all of her extended family. However, in July and August 2005, Mark started to become unreliable. He was heavily involved in organising protest at the G8 summit in Edinburgh and straight afterwards travelled to Iceland with 'Lisa'. 'Naomi' perceived that Mark had fallen deeply in love with 'Lisa' and she decided to end the intimate nature of her relationship with Mark in September 2005. Mark was apparently very distressed by this and sobbed in 'Naomi's' arms. He subsequently sent her an email saying how important she was to

him and how much he wanted to remain close friends. As a consequence, he and 'Naomi' did remain close friends over the following five years and indeed had two more intimate encounters.

219. 'Naomi' remained close friends and in regular contact with Mark until he was exposed. She was deeply shocked when she received a phone call on the morning of 21 October 2020 telling her that Mark was an undercover police officer. When the story broke publicly in January 2011, 'Naomi' went into hiding with 'Lisa' in order to avoid the media storm.

'C'

220. 'C' had a long-standing involvement in environmental activist campaigning from 1992, which included participating in campaigns linked to the anti-roads movement, Reclaim the Streets, the Earth First! movement and Climate Camp.
221. In around 2003, 'C' met a man who went by the name of 'Rod Richardson' when she was climbing in Derbyshire with a group of friends who lived in a housing cooperative in Nottingham, where 'Rod' had recently begun to live. 'C' recalls 'Rod' being flirtatious with her in a way that was obvious enough for another friend, who was interested in 'Rod', to feel put out. 'C' was not interested in 'Rod' and she did not form a relationship with him.
222. 'C' first recalls meeting Mark Kennedy (then known to her as 'Mark Stone') at the 2009 Earth First! Gathering in Cumbria. Although, Mark later told 'C' that he remembered her from the Climate Camp at Heathrow in 2007. At the 2009 Earth First! Gathering Mark took an active and focused interest in 'C'.
223. Following on from the 2009 Earth First! Gathering, 'C' and Mark became friends. 'C' was at the now much publicised '69's party' in September 2009, to celebrate 9 people's 40th birthday, including Mark's. Not long after this event, Mark disappeared from the activist scene, telling people he was spending time with his brother in the US.

224. Mark, still posing as 'Mark Stone', got in touch with 'C' via Facebook in or around January/February 2010. He went out of his way to establish this connection with 'C' and his communications were overtly flirtatious. 'C' had a long-standing friendship with 'Lisa' and was aware that 'Lisa' and Mark were in an open relationship. 'C' spoke to 'Lisa' prior to agreeing to a romantic relationship with Mark to ensure that 'Lisa' was OK with it. From March 2010, Mark and 'C' began a romantic sexual relationship, which continued until Mark was exposed as an undercover police officer in October 2010.
225. When Mark sought to re-establish contact with 'C' he was no longer deployed by the MPS in an undercover capacity. Clarity around Mark's activities, and the oversight of him, in the private sector after he left the police will be sought through the Inquiry process, but Mark has said when he first left the police he was employed by Global Open.¹² Looking back, 'C' believes that Mark deliberately groomed her using information that he knew about her, possibly gained via 'Rod Richardson', to make 'C' think they had things coincidentally in common – for example, he claimed to have spent summers when he was growing up staying with his grandparents in the same locality as she spent her early childhood. 'C' believes strongly that he targeted her primarily to continue his undercover spying activities in the private sector, using information he had gained and tactics he had learned in the MPS.
226. Mark was clear from the outset that he wanted a continuing and committed relationship with 'C', calling and texting frequently and making plans to meet, going out of his way, including telling mutual friends about his commitment to 'C' - which 'C' believes was a tactic to gain trust- to allay concerns 'C' had about the relationship moving too fast.
227. By the summer of 2010, 'C' had developed a strong emotional attachment to Mark and believed he was also 'in love' with her. In July, unbeknownst to 'C' 'Lisa' had discovered the passport in Kennedy's true name and confronted him about it. 'C'

¹² <https://publications.parliament.uk/pa/cm201213/cmselect/cmhaff/837/130205iv.htm>

believes that following this threat to his assumed identity from early August onward Kennedy tactically created drama between 'Lisa' and 'C', as a smokescreen. He also played on fears about his mental wellbeing (calling on his apparent breakdown the previous year) to hold 'C' in the increasingly stressful relationship.

228. 'C' discovered Mark had been an undercover police officer in person from Mark himself. Directly following his confrontation about his identity with activists in Nottingham (21 October 2010) he phoned 'C', apparently in considerable distress at circa 5am; he arrived at her home circa 8am. During a lengthy meeting he admitted he had been a police officer in the past, but claimed now to have a genuine commitment to the environmental and social justice cause. At this meeting and in subsequent phone calls Mark re-expressed his commitment to 'C' and tried to inveigle her to assist him in 'proving' his rejection of his previous police life and remaining within the activist community.
229. Learning that Mark was an undercover police officer, and then a corporate spy, was devastating for 'C', causing her a significant mental illness, which had an enormous impact on her personal and professional life for a considerable period thereafter. The nature of how she found out: alone, in her home, awoken from sleep and after a series of increasingly desperate and distressed phone calls from Mark over proceeding days was especially distressing and terrifying, resulting in the onset of dissociative episodes and destroying her sense of safety in her own home. Her relationship with Mark was very significant for her. During the course of the relationship Mark had spent time with 'C's' family and got to know her teenage daughter, going out of his way to build a relationship with her. He had supported 'C' through traumatic life events, including the death of 'C's' grandmother and she had trusted him as a genuine and loyal partner.

'Jane'

230. Jane had a very close friendship with the man she knew as 'Mark Stone' for 7 years, covering the entire period during which he was deployed as an undercover officer with the NPOIU. 'Jane' was the first person Mark met in the activist scene when he

arrived in Nottingham and they lived together in shared accommodation for approximately two years between the summer of 2003 and spring 2005. Early on in this period, Mark invited some 'friends' from London to their shared home and suggested that 'Jane' might want to get involved with one of them. 'Jane' now believes that that man was also a police officer. When Mark moved out into his own house, 'Jane' lodged with him for just over a month. Although they did not live together again, they remained close and in the autumn of 2008, Mark initiated sexual contact with 'Jane'. They shared a few further intimate encounters over the following months, but then reverted to a close platonic friendship after the summer of 2009. 'Jane' was devastated by the discovery that Mark was an undercover officer and continues to be affected by this.

'Maya'

231. In 2005, 'Maya' moved into a housing co-operative in Lewisham. She was friends with some other residents who were involved in political activities, particularly anti-imperialism and Palestinian Solidarity, including an organisation called the International Solidarity Movement ['ISM']. Maya was not directly involved in ISM, however she became part of the same social scene with some of its members.
232. One of the members of ISM was a man known 'Rob Harrison'. He visited the housing co-operative where 'Maya' lived frequently and they developed a rapport. In May 2006, they started an intimate relationship, following an encounter at a fundraising event at which Rob was DJing. 'Maya' was initially reluctant for it to become serious, however Rob applied pressure on her from the beginning, becoming angry at the suggestion that she did not want to commit herself to him too quickly.
233. During the relationship, Rob subjected 'Maya' to significant emotional abuse and coercion. He engaged in controlling behaviour, including behaviour calculated to cause 'Maya' to suffer feelings of guilt and low self-esteem. He regularly accused her of infidelity or promiscuity. Rob would become angry and appear possessive whenever she spent time with other men. He often sent text messages accusing her of sleeping with other men. 'Maya' believes that this behaviour was a means of coercing her into

proving her commitment to him. The accusations of infidelity had a devastating psychological impact on her, causing her to self-harm by cutting herself on several occasions which Rob was aware of at the time. She felt compelled to prove to him that she was faithful to him and became isolated from some of her close male friends as a result.

234. The relationship was mainly conducted at 'Maya's' flat. Rob would never take her on dates. He would also make himself uncontactable to 'Maya', sometimes disappearing for long periods. He would not reply to her messages or pick up calls from her for long periods. Sometimes he would block her number.
235. 'Maya' and Rob broke up abruptly around Easter 2007. He claimed that his mother was dying of cancer and needed to spend her final months with her. He severed ties with the ISM activist community at the same time.
236. 'Maya' was devastated by Rob's sudden departure. She started using hard drugs, including crack and heroin, as a means of coping with her feelings of loss and to block out memories of the things Rob had accused her of. She had to travel abroad to stay with family to help her recover from the shock of the break-up and to break her drug habit.
237. 'Maya' started a one-year Masters degree in 2006, but because of the negative impact of Rob's treatment of her during the relationship and his departure it took her five years to complete the course
238. After his departure, Rob continued to contact 'Maya' intermittently for several years by sending her emails, instant messages and by leaving comments on her blogs. This only stopped in 2011.
239. In August 2014, Rob contacted 'Maya', again and asked her to meet him. They met up in September 2014. His appearance had changed significantly: he had cut his hair short and had begun wearing suits. They communicated online regularly and met several times over the next few months, during which time Rob talked about the

future, expressing a desire to resume their relationship and to have children together, even discussing with her what names to give their children. As a result of Rob's reappearance, 'Maya' broke up with her partner of 5 years, with whom she was living at the time.

240. In February 2015, 'Maya' and Rob slept together for the first time since they had separated in 2007. They had unprotected sex and 'Maya' had to take emergency contraception the following day. The same day Rob disappeared and with the exception of one email he sent to her in 2016, he has never contacted 'Maya' since.
241. On 11 December 2018, the Undercover Policing Inquiry revealed that 'Rob Harrison' was the cover name for an undercover officer within the SDS. The Inquiry revealed that this officer had been deployed into at least four left wing activist groups between 2004 and 2007: International Solidarity Movement, State of Emergency (aka State of Emergency Collective), No Borders and Globalise Resistance.
242. 'Maya' learned that the man she had had a relationship was an undercover police officer in March 2019, when she was informed by a friend who had been a member of ISM. She has struggled to come to terms with the fact that an important part of her life was based on a lie. Her mental health deteriorated sharply after the discovery, and she has experienced periods of suicidal feelings and self-harm. She is currently studying for a PhD which was due to be completed this year, however due to the impact of the discovery she has had to extend this to 2023.

PART C: The impact of the relationships

243. The impact of these relationships on the women has been devastating and life-altering. The vast majority have been diagnosed with very significant psychiatric injuries as a result, including Post Traumatic Stress Disorder.
244. Before they even discovered the truth, many of the women were already deeply traumatised and scarred by the deceptions and extreme emotional manipulation practised on them. To groom the women, the UCOs mirrored their interests and

values and were unstintingly supportive and attentive. Unsurprisingly many of the women fell deeply in love, believing they had met their soul mate. Having drawn the women in so comprehensively, they then deployed a markedly similar and deeply cruel exit strategy – a sudden withdrawal often accompanied by an apparent mental breakdown, or emotional trauma. This left the women not only dealing with their own sudden, inexplicable and enormous loss, but also carrying a huge burden of worry and fear about the welfare of their lost partner.

245. Having loved and lost someone so seemingly perfect inevitably bore on the women's ability to forge later relationships and in some cases the resulting difficulties were compounded by the UCO continuing to make sporadic contact.

246. Contemporary understanding of the traumatic impact of betrayal has increasingly recognised the significance of the shattering of the victim's assumptions, in particular three basic assumptions about the world: the world as benevolent, the world as meaningful and the self as worthy (Janoff-Bulman (1992)). This is recognised to have a profoundly disabling and disorienting effect. Assistant Professor Carolyn Quadrio, the consultant psychiatrist who assessed 'Ellie' explains it in this way:

“Understandings of betrayal trauma initially arose out of the study of childhood sexual abuse, which is most often perpetrated by a trusted figure, such as a parent or other family member (Finkelhor, 1987, Finkelhor et al, 1985; Leahy et al, 2004). The concept is also applied to adult relationships involving a priest or a clinician, or an intimate partner (Flynn, 2008; Platt et al, 2009; Rutter et al, 1998).

In all these relationships the abuse proceeds without the use of physical violence, but by manipulation and deceit, which is essentially the process known as 'grooming', commonly seen with child victims of sexual exploitation and also used in the trafficking of women (Beeson, 2015). Initially, victims are unaware of the grooming process, they believe it to be a special relationship and they may remain bonded to the perpetrator for a long time, years and even decades (McElvaney, 2019). When the victim finally recognises that the perpetrator's affection was a ploy, they experience a sense of betrayal and may react with shock, fear, guilt, rage, helplessness, and the loss of trust (Bezpalcha, 2003, cited in Yakushko, 2009)...

Betrayal is often the most damaging or most traumatic aspect of the abuse (DePrince et al, 2013; Ford et al, 2009; Martin et al, 2013). It leads to loss of trust in self and other: the world is no longer benevolent or meaningful or the

self worthy (Janoff-Bulman, 2010). Victims feel powerless and shamed and no longer trust their own capacities...”

247. This captures the reactions described by many of the women upon discovering that a person they had spent the most intimate aspects of their lives with over a prolonged period of time was engaged by the state to spy on them. Here, in their own words some of the women describe the devastating consequences:

“...my partner turned out to be leading a double life, and was not in fact the person I believed him to be at all, but the opposite in many ways, and he was placed into my life to deceive me by an employer who would inevitably one day pull him out. Finding this out has broken my heart, devastated my life and shattered my trust in people. It has also impacted on my confidence in myself as a person worthy of such a relationship, and in my ability to judge character. The fact that this disregard for my mental health was sanctioned by the state is a fact that I’m still struggling to process.... As the most unbelievable thing in the world turned out to be true, I had no solid ground upon which to base my judgment of what was likely or unlikely.” – ‘Lisa’

“... I feel really destabilised and sometimes I feel nauseous... I feel like everything’s shifting, like I have motion sickness..” – ‘Lisa’

“... the world recoiled and I could not get my bearings. I spent many months afterwards trying to reconstruct all my memories to make sense of my experiences. In fact I could not and have not managed to do this or to reconcile my direct personal knowledge of ‘Mark Stone’ with everything I have learned about Mark Kennedy.” – ‘Naomi’

“The impact has evolved over time. The knowledge has annihilated the relationship I understood but it has taken time, it didn’t happen immediately... The pain has become deeper and more distressing as the seriousness of the violation and the extent of the betrayal sinks in. I can only describe it as layers of an onion that keep peeling off the more that time passes and other things come back into my mind about the relationship, James, that this was sanctioned higher up in the police, the complete invasion of my privacy. Now I feel like my life is being invaded again and again and again.” – ‘Sara’

“In terms of explaining my reaction to the news, that is hideously hard to do. It is like I have lost all integrity, and every feeling has an opposite that makes it null and void... I was furiously angry, and at the same time devastatingly sad, at the loss of a loved one, who was never a loved one, mourning the death of someone who never existed while cursing his very existence... and so-on, in circles, so that it is impossible to find closure for any one feeling as it flows into another, equally debilitating one... it is always there, and it won’t go away.” – Kate

“This has left me with deep and traumatic gaps in my own biography.” – Kate

248. The institutional aspect is uniquely destabilising: the fact that these were police officers, with the power of the state behind them. When the state has put an imposter in the most intimate aspects of your life, there really is no solid ground left on which to stand. The reality is so outlandish that truly anything seems possible.
249. Many of the women continue to struggle with feelings of being watched, bugged, tracked or monitored. Many of them describe incidents where they have become convinced that something apparently innocuous is in fact indicative of continued monitoring by the state. For example, one of the women became convinced that email messages that were superficially spam were in fact coded messages from or about her former partner. Others have been convinced that objects have been moved within their home, indicating that someone has been inside.
250. Nearly all of the women no longer feel able to participate in political activity, because of the fear of being spied on. They have been stripped of the freedom to manifest their political beliefs with others, a freedom which for many was at the core of their identities. The ability to campaign for a better world was what gave them hope for the future. That is now gone.
251. Relationships, both intimate and familial have been damaged. Many of the women experience “flash bulb” memories, often around sex, making intimate relationships very difficult.
252. For several of the women, the consequence of the deceit and betrayal has been that their child bearing years have passed without being able to form a relationship that would have enabled them to start a family. Others, who have been able to start a family, feel that their relationships with their children have been damaged by the trauma they have suffered and the desperate need to continue to fight to uncover the truth, despite the glacial speed of the Inquiry and its unpromising record to date. For many of the women, the intrusion extended well into their families. For those like ‘C,’ who had a child, there was the obvious danger that the child would become attached

to the officer and suffer trauma when the relationship inevitably ended. Plainly the intrusion for 'Rosa' and her family is unimaginable. Mark Jenner was embraced by Alison's family, often spending Friday nights together celebrating the Jewish sabbath. Mark Kennedy was heavily integrated into both 'Lisa' and Kate Wilson's families and also spent special occasions with Naomi's family. Boyling even prevented 'Rosa' from being by her father's bedside when he died. Lambert went to visit Belinda's parents, her sister and grandmother in her care home. Her family considered him her life partner. All the harm caused to wider family members, especially children must also be taken fully into account as wholly unjustified 'collateral' damage.

253. Many of the women have had their careers blighted, either because of the psychiatric injuries they have suffered; or because they were in professions which require contact with the police (for example social work), which they now cannot face; or because of choices they were encouraged to make by the undercover officer when they were still in a relationship – 'Sara', for example, had a very high-powered career, which she loved, but relinquished, with 'James'' encouragement, following the collapse of their relationship.

254. 'Alison' reflected the experience of almost all of the women when describing her response in evidence to the Home Affairs Select Committee in 2013:

“...I have, for the last 13 years, questioned my own judgment and it has impacted seriously on my ability to trust, and that has impacted on my current relationship and other subsequent relationships. It has also distorted my perceptions of love and my perceptions of sex, and it has had a massive impact on my political activity.”¹³

PART D: Common traits and evidence of system

255. The sheer number of officers who engaged in relationships whilst deployed must alone call into question the assertion that these were the unilateral actions of a few rogue officers. But there is so much more evidence that the women have been able to assemble through sharing what happened to them, some of it already touched

¹³ <https://publications.parliament.uk/pa/cm201213/cmselect/cmhaff/837/130205i.htm>

upon, that undermines that assertion and points to relationships being at the very least tacitly authorised as an intelligence gathering tool.

256. For example, it is clear that many UCOs knew about the intimate relationships their colleagues were engaged in. For example, 'Marco Jacobs' was aware of Mark Kennedy's relationship with Kate and both he and 'Lynn Watson' were well aware of Mark Kennedy's relationships with 'Lisa'; the 'friends' Mark brought to Nottingham from London were aware he was in an intimate relationship with Kate; and 'Jason Bishop' was aware of Jim Boyling's relationships with 'Monica', 'Ruth' and 'Rosa'. Indeed, the relationships were rarely hidden, and given the level to which many of the public gatherings the couples attended were monitored by the SDS/NPOIU, it stretches credulity to suggest that the intimate relationships were not known about within, at least, those units. Yet, if these really were the actions of rogue officers, it is simply inexplicable that they did nothing to stop or discourage them.
257. Even more compelling is the common methods that the UCOs deployed, methods by which the women were groomed, methods which dictated how the UCOs conducted the relationships, right through to the exit strategies they used to bring the relationships to an end. These demonstrate beyond doubt the systematic and strategic nature of these intimate relationships.
258. As mentioned, mirroring was a technique used by UCOs to groom women: Andy Coles told some of 'Jessica's' friends that he had been adopted (like her); Mark Kennedy liked country music when he was pursuing Kate, then drum and bass when pursuing 'Lisa'. He claimed to have grown up in Battersea (like Kate) when seeking a relationship with her and then when courting 'C' he told her that when he was growing up he had spent time at the same local park in Norwich which she had gone to as a child. 'James Straven' told 'Ellie' that he was born in Oman; she had lived in Jordan. With Sara he shared her spiritual journey.
259. There is clear evidence that officers would pass information to each other in order to facilitate mirroring. Some of the women have been able, in retrospect, to identify

where one UCO has fed personal information about her to a subsequent UCO that has then been used to groom her for a relationship. For example, 'Rosa' recalls having a conversation with 'Jason Bishop', some time before she met Jim Boyling, in which she told him how she had drawn strength from a particular view of the spirituality of trees when going through a difficult time as a teenager. Later, with Boyling, he mirrored to her the exact same thoughts as if they were his own. 'Rosa' is sure that this was done to manipulate her into thinking there was a special connection between them. The only source of that information could have been 'Jason Bishop'.

260. Similarly, as noted at [225] above, 'C' believes that information obtained from her by 'Rod Richardson' during a climbing trip in 2003 was fed to Mark Kennedy for use when he targeted her for a relationship in 2009. Likewise, 'Rod Richardson' knew both Kate and 'Lisa' well and knew of 'Lisa's' passion for climbing. It cannot have been a coincidence that Mark Kennedy, who succeeded 'Richardson' in infiltrating the Nottingham group, turned up with a cover story of being a rope access technician and a keen recreational climber and mountaineer who wanted to be near Stanage Edge.
261. A further common technique was emotional manipulation to draw on the women's empathy and build trust. For example, Carlo Neri used stories of mental health problems and domestic abuse in his childhood with Donna; Mark Kennedy claimed to be deeply damaged by his father having left home when he was a child, and that he had been bullied at school due to his stutter and lazy eye; John Dines pretended that he lost both of his parents to build his relationship with Helen and wrote to her describing the funeral. He also told her that he had been the victim of physical abuse from his mother and pretended to have learnt that the man he grew up believing to be his father was not in fact so. Rob Harrison told 'Maya' that he had been emotionally neglected by his mother and ran away from home as a teenager before finishing school, after which he became estranged from her. Mark Jenner told 'Alison' that his father was killed by a drunk driver when he was 8 years old. It is notable that Andy Coles had previously had a relationship with 'Jessica', whose brother was killed by a drunk driver when she was 11 years old. According to Peter Francis, UCOs were trained to go into the field by the cohort who had just been deployed. Mark Jenner

was deployed after Andy Coles. The question obviously arises as to whether Andy Coles worked with Mark Jenner to build his legend.

262. In grooming 'Jessica', 'Ellie' and 'Helen', Andy Coles, 'James Straven' and John Dines all took advantage of the women's young age and all three men lied about their ages to reduce the appearance of an age gap.
263. Most of the women describe the man they had a relationship with as being extremely attentive and supportive and quickly cultivating a deep connection with them. For example, Belinda says of her relationship with Bob Lambert: "The relationship was passionate and romantic. He often told me that he loved me and missed me when we were apart. He gave me the impression he wanted to be with me all the time and forever. By getting to know my family and the way he confided in me about his feelings and his psyche made me believe the relationship was genuine. I saw him very frequently. We practically lived together from the start and spent six months living together as a couple in a shared flat with others." Donna tells of the intensity of her relationship with Carlo. "He asked me to marry him on New Year's Eve 2002, three months after we met. We spent time discussing our wedding plans, including venue, music, guests and food. He promised to buy a ring which never materialised. He said very early in the relationship that he wanted to have a baby with me". John Dines was equally demonstrative and romantic with Helen: "John sent me lots of letters, Valentine cards, and talked with me about wanting to have lots of children with me because he was an only child. He sent me poetry that he'd written himself. He made plans with me to buy a plot of land, grow our own food and start a family. He said he pictured us growing old together, on the veranda, looking into the sunset".
264. Finally, as noted there were also striking similarities in the exit strategies of many of the UCOs: 'Straven' told 'Sara' that his friend had committed suicide following sexual abuse; John Dines, Mark Jenner, Jim Boyling, Carlo Neri and Mark Kennedy all faked mental breakdown. For example, John Dines told Helen that his dad wasn't his real dad, that his mum never loved him, that he threw all his mum's jewellery in the river, and that his mum had physically abused him including slashing him with a knife. He said the only person he thought had ever cared for him had left him (his ex-girlfriend)

and that was why he never trusted that Helen would not abandon him, leaving him alone again in the world.

265. The similarities in the devices used inexorably points to the deliberate use of sexual relationships as one of the means by which UCOs were permitted or encouraged to do their job. It was a tactic.

PART E: The police response

266. The MPS response at every step since the story broke with Mark Kennedy in late 2010 / early 2011 has been to seek to withhold as much information as possible and to delay and further delay investigations; first in relation to the women's civil claims and subsequently in this Inquiry. The positions adopted by the MPS in the civil litigation, first in the High Court and latterly in Kate Wilson's claim in the Investigatory Powers Tribunal ['IPT'], are summarised below in order to illustrate the extent of the resistance on the part of the MPS to making disclosure and to highlight the importance of the Inquiry, as a ***public*** Inquiry, ensuring that the full facts are brought to light. These obstructive tactics have prolonged and compounded the harm already caused to the women by the deceptive relationships.

267. In particular, the Inquiry is asked to consider carefully the important points that Kate Wilson was able to raise in the IPT proceedings, even on the highly selective and heavily redacted disclosure she was there given, once she was able to see the underlying documents. That exercise illustrates the point that the women – and all NPSCPs – have been making (repeatedly) in the Inquiry: that there are points that only they, as the subjects of the recorded information, will be able to make, but only if they are shown the underlying material. These are points which the MPS will not volunteer, and which the Inquiry is unlikely to be able to identify of its own motion, because it simply does not have the first-hand knowledge of the underlying events to be able to do so.

268. If the Inquiry is serious in its pursuit of the truth, it must enable the other side of the story to be heard. That requires disclosure to be made, not merely in fragmented categories, but so as to enable those affected to identify patterns and themes, and to

be in a position to raise relevant points on which to test the evidence. Of particular importance is the release to the women of their personal 'Pink' or 'Registry' Files held by Special Branch, since only they will be able to spot the information in there which was used or collated in the course of the UCOs deceptive relationship.

The history of the civil litigation

269. In October 2011, Kate Wilson, 'Lisa' and 'Naomi' issued a civil claim against the MPS for common law claims in assault, misfeasance, deceit, negligence and under the Human Rights Act 1998, for breaches of Articles 3 and 8 ("the first claim"). The MPS initially agreed in correspondence to make disclosure in response to the claims, but that was subsequently withdrawn. Instead, in June 2012, the MPS applied to strike out the women's claim on the grounds that it should have been brought in the Investigatory Powers Tribunal. In the same month, the MPS responded to a letter of claim on behalf of 'Rosa', Helen, 'Alison', Belinda, and 'Ruth' ("the second claim"), raising for the first time 'NCND' (that they would 'neither confirm nor deny' the basis of the claims) and refusing to make any disclosure. This stance was repeated in the MPS' pleaded defence following the issue of proceedings.
270. In the first claim, the High Court ruled that the Human Rights Act claims must be heard in the IPT but would be stayed pending the outcome of the common law claims, which were to proceed in the High Court. The Court of Appeal dismissed the women's appeal in respect of the Human Rights Act claims in November 2013. On 24 December 2014, the Supreme Court refused the women's permission to appeal against the Court of Appeal's decision.
271. The MPS then sought to strike out both sets of proceedings on the ground that it was unable to defend them due to its inability to either confirm or deny the basis of the claim. Strikingly, it took this stance in relation to the claim relating to Mark Kennedy even though it accepted that it was pointless and unrealistic to NCND that Kennedy was a police officer who had been authorised to act undercover, not least because they had already confirmed this in the media. Shortly before the hearing of its application to strike out, on 14th March 2014, the MPS withdrew the application but

continued to maintain its decision to rely on NCND in relation to all the factual allegations in the claims. As a result, the women claimants were forced to make their own application to the court to obtain an order that the MPS should not be permitted to rely on NCND to avoid their obligation to plead a full and adequate Defence on the facts. The MPS strongly defended the application, including in relation to those officers who had been named publicly as having operated undercover, those named by the Ellison report and those who had self-disclosed.

272. In July 2014, the High Court ruled that the MPS could not rely on its policy of 'NCND' to avoid pleading a defence

273. On 30 July 2014 the MPS served an Amended Defence in the second claim. In the Defence they:

- (1) Admitted that Jim Boyling and Bob Lambert were undercover officers and that they had had relationships with 'Rosa', 'Ruth' and Belinda Harvey.
- (2) Made the dishonest assertion that the relationships occurred because of 'mutual attraction and genuine personal feelings' between the two officers and the women.
- (3) Made the extraordinary denial that the officers had used deceit with the intention that 'Rosa', 'Ruth' and Belinda Harvey should enter into long-term sexual relationships.
- (4) Made the extraordinary denial that the officers had abused their power or that they had acted unlawfully.
- (5) Admitted that the Defendant's guidance advised the use of fleeting sexual relationships if necessary but denied that supervising officers had expressly authorised or tacitly acquiesced in **long-term** intimate and sexual relationships in general or in the Claimants' relationships in particular.
- (6) Continued their NDND stance in relation to John Dines and Mark Jenner.

274. Next the MPS sought to bring the proceedings to an end by making a Part 36 offer. This was not accepted and in December 2014 a mediation of the second claim took

place. A further mediation took place in the first claim in June 2015. It was not until 19 May 2015 that the MPS served a Defence in which it admitted that Mark Kennedy had been an undercover police officer, but made no admissions in relation to the women's case that Kennedy had entered into intimate relationships with them. In light of that non-admission they said nothing whatever about whether his supervisors knew or authorised him to do so.

275. In November 2015, settlement of all of the claims, bar those of Kate Wilson, was announced and the MPS issued a public apology to the women¹⁴. The terms of the apology accepted that the behaviour of a number of police officers working for the SDS and NPOIU had been "totally unacceptable" and described the relationships with the women as "abusive, deceitful, manipulative and wrong." The relationships were also accepted to be "a violation of the women's human rights [and] an abuse of police power". The full terms of that apology are set out here to ensure that they are on record for all time in an accessible place:

"The Metropolitan Police has recently settled seven claims arising out of the totally unacceptable behaviour of a number of undercover police officers working for the now disbanded Special Demonstration Squad, an undercover unit within Special Branch that existed until 2008 and for the National Public Order Intelligence Unit (NPOIU) an undercover unit which was operational until 2011.

Thanks in large part to the courage and tenacity of these women in bringing these matters to light it has become apparent that some officers, acting undercover whilst seeking to infiltrate protest groups, entered into long-term intimate sexual relationships with women which were abusive, deceitful, manipulative and wrong.

I acknowledge that these relationships were a violation of the women's human rights, an abuse of police power and caused significant trauma. I unreservedly apologise on behalf of the Metropolitan Police Service. I am aware that money alone cannot compensate the loss of time, their hurt or the feelings of abuse caused by these relationships.

This settlement follows a mediation process in which I heard directly from the women concerned.

I wish to make a number of matters absolutely clear.

¹⁴ https://maps.met.police.uk/SysSiteAssets/foi-media/metropolitan-police/disclosure_2019/april_2019/information-rights-unit---police-apology-linked-to-undercover-spies-made-in-november-2015

Most importantly, relationships like these should never have happened. They were wrong and were a gross violation of personal dignity and integrity.

Let me add these points.

Firstly, none of the women with whom the undercover officers had a relationship brought it on themselves. They were deceived pure and simple. I want to make it clear that the Metropolitan Police does not suggest that any of these women could be in any way criticized for the way in which these relationships developed.

Second, at the mediation process the women spoke of the way in which their privacy had been violated by these relationships. I entirely agree that it was a gross violation and also accept that it may well have reflected attitudes towards women that should have no part in the culture of the Metropolitan Police.

Third, it is apparent that some officers may have preyed on the women's good nature and had manipulated their emotions to a gratuitous extent. This was distressing to hear about and must have been very hard to bear.

Fourth I recognise that these relationships, the subsequent trauma and the secrecy around them left these women at risk of further abuse and deception by these officers after the deployment had ended.

Fifth, I recognize that these legal proceedings have been painful distressing and intrusive and added to the damage and distress. Let me make clear that whether or not genuine feelings were involved on the part of any officers is entirely irrelevant and does not make the conduct acceptable.

One of the concerns which the women strongly expressed was that they wished to ensure that such relationships would not happen in future. They referred to the risks that children could be conceived through and into such relationships and I understand that.

These matters are already the subject of several investigations including a criminal and misconduct enquiry called Operation Herne; undercover policing is also now subject to a judge-led Public Inquiry which commenced on 28th July 2015. Even before those bodies report, I can state that sexual relationships between undercover police officers and members of the public should not happen. The forming of a sexual relationship by an undercover officer would never be authorized in advance nor indeed used as a tactic of a deployment. If an officer did have a sexual relationship despite this (for example if it was a matter of life or death) then he would be required to report this in order that the circumstances could be investigated for potential criminality and/or misconduct. I can say as a very senior officer of the Metropolitan Police Service that I and the Metropolitan Police are committed to ensuring that this policy is followed by every officer who is deployed in an undercover role.

Finally, the Metropolitan Police recognises that these cases demonstrate that there have been failures of supervision and management. The more we have learned from what the Claimants themselves have told us, from the Operation Herne investigation and from the recent HM Inspectorate of Constabulary report the more we accept that appropriate oversight was lacking. By any standards the level of oversight did not offer protection to the women concerned against abuse. It is of particular concern that abuses were not prevented

by the introduction of more stringent supervisory arrangements made by and pursuant to the Regulation of Investigatory Powers Act 2000. The Metropolitan Police recognizes that this should never happen again and the necessary steps must be taken to ensure that it does not.

Undercover policing is a lawful and important tactic but it must never be abused.

In light of this settlement, it is hoped that the Claimants will now feel able to move on with their lives. The Metropolitan Police believes that they can now do so with their heads held high. The women have conducted themselves throughout this process with integrity and absolute dignity.”

276. Thus, the position of the MPS was that, whilst clearly these relationships should not have happened:

- a. they were not authorised;
- b. such relationships “would never be authorised in advance nor indeed used as a tactic of a deployment”;
- c. if an officer did have sexual relationship, he was required to report it; and
- d. the fact that the relationships had occurred was attributed to “failures of supervision and management” and lack of “appropriate oversight”.

277. As noted above, the settlement announced in November 2015 did not include Kate Wilson’s claim. She continued with her claim and continued to seek disclosure. The MPS then withdrew its defence of her claim.

278. The women are in no doubt that this was a further attempt by the MPS to avoid having to make disclosure. The withdrawal of the Defence was the only step left to the MPS to avoid its inevitable duty to make disclosure should the proceedings continue. Kate’s common law claim was eventually settled in January 2017, with the terms of her settlement not precluding her from proceeding with her Human Rights Act claims in the IPT.

Kate Wilson’s claim in the IPT

279. The stay of Kate’s IPT claim was lifted on 10 April 2017 and her grounds were amended in March 2018. In summary, she seeks a declaration that the MPS

treatment of her infringed her rights under Articles 3, 8, 10 and 14 of the European Convention on Human Rights.

280. The MPS has continued in the IPT proceedings to seek to avoid disclosure at all costs, just as it did in the High Court proceedings. It first sought to strike out the claim for being out of time, and then made a number of admissions in the hope that this would be enough to have the rest of the claim stopped, or at least for the disclosure requirement to be removed. Since the failure of those applications, it has withdrawn some of those admissions, although the admissions that the sexual relationship amounted to inhuman and degrading treatment in breach of Article 3, remains. In its defence the MPS admitted, among other things that Kennedy's cover officer had been aware that Kennedy was conducting a close relationship with Kate and should have been aware that it was a sexual relationship. It then served an amended defence, in which further admissions were made, including that additional officers – Kennedy's cover officers (plural) and line manager - were aware of his close relationship with Kate, that they ought to have known it was a sexual relationship, and that they acquiesced in the relationship.
281. In the course of the IPT proceedings, 10,000 pages of closed material were provided to the Tribunal of which Kate was provided with a small 'sample' (around 200 page) for the purpose of seeking to agree a redaction protocol. Kate subsequently made a witness statement commenting on the 'sample disclosure'. A material passage from that witness statement is set out at [24] above and the significance of what even that limited disclosure enabled her to understand and therefore raise is addressed at [25] and [285]-[287] below.
282. As noted, when its attempts to avoid disclosure by making admissions failed, on 18 January 2019, the MPS served a further amended defence, which withdrew some of the admissions that had previously been made, including that anyone other than Kennedy's principal cover officer knew or ought to have known about the relationship and that there were systemic failings which resulted in Article 3 and 8 breaches.

283. On the same date, the MPS served a witness statement from Sir Stephen House, MPS Deputy Commissioner. Sir Stephen has no first-hand knowledge of the matters material to the claim, rather his witness statement provides an account of his interpretation drawn from the underlying documents.
284. Kate objected to this approach and made a further witness statement critiquing the analysis set out in Sir Stephen's statement based on the documents that had been disclosed to her in the 'sample disclosure'. The IPT directed that certain categories of document should be reviewed by Counsel to the Tribunal. Following the hearing, the Tribunal directed Sir Stephen House to produce a further witness statement and that Counsel to the Tribunal was to determine which of a schedule of documents were to be disclosed to Kate.
285. Around 2000 pages (about 20%) of the underlying evidence has now been disclosed to Ms Wilson, and the implications of that disclosure are grave. Firstly, it has become clear that the documents present significant difficulties to any legal team or witness trying to interpret the material if they were not involved in the events at the time. The lawyers representing the MPS and NPCC wrote on 9 October, in relation to ciphering and redacting the material, that:
- “It is not possible merely by looking at the schedule materials and how people have been variously referred to and/or described, to guarantee that incorrect ciphering does not occur... anyone now looking at the materials without having additional information available to them [will not] easily and accurately be able to apply an individual cipher for each separate person”.
286. Ms Wilson, on the other hand, has been able to identify examples of unauthorised overseas deployments, significant misrepresentation of groups and individuals and extremely inaccurate reporting of events, as well as major failures in authorisation process and in oversight and management and evidence that senior officers must have been aware of the relationship. Sexist attitudes and political prejudice are evident throughout the material, and, as Ms Wilson stated in Annex A to her submissions to the Tribunal (27 February 2020)

“the Defendants appear to have adopted a ‘thought crime’ approach to breaching people’s rights... repeatedly stating that anyone they considered to be a “like-minded individual” was a legitimate target, and that as a consequence, risk of collateral intrusion was low. One authorisation goes so far as to say that “the secretive nature of the subject group is such that any person present during the deployment is within the membership of that group”. This sentence cleverly makes anyone who comes into contact with Mark Kennedy by definition a target of the operation, presumably removing any possible risk of collateral intrusion”.

287. Finally, and as a direct result of that disclosure process, the police are now admitting that not only Mark Kennedy and his principle cover officer, but also Jim Boyling, Jason Bishop, Rod Richardson, Lynn Watson and Marco Jacobs all violated Kate Wilson’s Article 8 right to privacy. The police had spent 3 years robustly resisting any investigation of the facts of those Article 8 breaches, on the grounds that they were ‘insignificant’ before finally making that admission. David Perry QC, counsel for the MPS and NPCC in the IPT described the facts underlying the admission as ‘ugly’ however the specific basis for the sudden change of position has not yet been explained. It should be noted that the contact Ms Wilson had with these other officers was not intimate or sexual. Far from being ‘insignificant’ therefore, this admission has implications for hundreds of other individuals who were subject to similar disproportionate interference with their Article 8 rights.

The MPS approach to the Inquiry

288. The original position adopted by the MPS, prior to the legal principles ruling, was that it should be permitted to maintain its stance of NCND in all public aspects of the Inquiry and that all police evidence should be heard in closed proceedings. Following Sir Christopher Pitchford’s rejection of that approach, the start of the substantive hearings has been delayed for a further four and half years dealing with applications for anonymity and redactions to documents. The refusal of the MPS to release all the cover names of officers means that those officers’ assertions relating to their conduct will go unchallenged by those on whom they were spying, and that some women may never find out that they too were deceived into relationships by state agents, or

indeed that they have borne children from those operations, nor will such children know. Finally, as a result of the refusal of the vast majority of officers and former officers to give evidence in their real names – thereby precluding the proceedings from being broadcast - only a tiny number of non-state core participants and members of the public will be able to see or hear the evidence being given.

289. This entire history does not suggest an organisation that is ready to be open and frank about its failings. On the contrary, it demonstrates an organisation that remains desperate not to account, let alone to account publicly, for the terrible damage it has permitted its officers to do to the women. It is fundamentally wrong that an organisation which has admitted significant human rights breaches over an extended period, is allowed to have so much influence and control over both the extent of the information released to those who were subjected to the abuses and the speed of the Public Inquiry into those abuses.

PART F: Hopes and concerns for the Inquiry

290. The women's need for answers is no less burning now than it was when they first suspected or learned the truth. They need answers about what was done to them and why; who authorised, condoned or acquiesced in it; who knew about it; what information was shared and recorded about them; and what will be done to stop it happening to others.

291. This need to understand is a deeply human one that we can all relate to. Until the women have answers to their questions there can be no resolution for them. The impact of the abuse will continue. They need to know whether they were deliberately targeted by the state, and if so why. They need to know whether personal information about their most intimate lives is still on a file somewhere – the Bob LAMBERT report referencing Mike Chitty's treasured collection, relating to Lizzie, of

love letters & photographs kept in a locked box¹⁵, and disclosure made to Kate in the IPT, suggest that it probably is. They need definitive answers, that they can have confidence in, as to whether anyone else in their lives was a UCO. They need to know that it won't happen again.

292. This need has been recognised repeatedly by many of the psychiatrists and psychologists that have assessed the women over the years since the scandal broke: Dr Brock Chisholm, Chartered Clinical Psychologist, wrote in February 2013 in respect of the recommended treatment and prognosis for the significant psychiatric injuries caused to 'Alison' by her relationship with Mark Jenner:

"The most helpful thing for ['Alison'] would be to learn the truth so that she can make sense of what was true and what was not as well as make a judgment about continuing threat or likelihood of being monitored. It would also give meaning and allow her to resolve the loss of Mark."

Dr Chisholm talks about the difficulty in engaging in therapy without knowing the extent to which 'Alison's' fears about what may be true are actually the case:

"It is debatable about what was true and what was not true. The term delusion is a value statement about the beliefs that a person holds being outside what most people believe is true. However, it appears likely that some of what ['Alison'] believed was correct, even though most others thought that she was deluded."

Dr Georgina Smith, Specialist Clinical/Research Psychologist wrote in respect of Kate in July 2015:

"The lack of disclosure has left [Kate] with numerous unanswered questions, many related to her own identity and self-esteem: whether or not she was targeted; whether or not her relationship with Mark was closely monitored; to what extent their relationship and the things they did together were determined by the Metropolitan Police. In the absence of these answers, [Kate] is left ruminating and imagining possible scenarios, resulting in an inability to move on from this and a tendency (due to her [psychiatric injury]), to imagine the worst case scenarios, which can in turn exacerbate her psychological difficulties."

¹⁵ This is referred to at p. 88 of *Undercover: The True Story of Britain's Secret Police*, Paul Lewis and Rob Evans (2013). Lambert wrote a 45 page secret report which disclosed that Mike Chitty had resumed his undercover identity for about two years after having been pulled out of the field in 1987.

293. The women continue to participate in the Inquiry, but the hope they had at the outset that here they will finally be given the answers they need, has diminished to the point of vanishing. They continue because they remain impelled to find the truth and to prevent these abuses happening to any other woman. This latter imperative is all the greater given that there appears to be no criminality arising from these deceptions in light of the Divisional Court's judgment in *R (Monica) v DPP*, no explicit guidance in RIPA protocols and a wholesale failure to address this issue in the Covert Human Intelligence Sources (Criminal Conduct) Bill currently making its way through Parliament. Indeed, one of the tragedies of the delays in this Inquiry is the resulting inability to feed into those debates.
294. The women have waited for over five years and, barring the heavily redacted Tradecraft Manual, have not received any significant disclosure. They have repeatedly requested disclosure of their personal files in order that they can begin the process of grappling with what is (or isn't) in them, but have been told that this is an "unhelpful distraction" from the work of the Inquiry. The extent and scope of the restriction orders granted to officers means that they are never likely to know the full extent of the intrusion into their lives, how many other officers were involved in their lives, or knew of the relationships.
295. They are deeply concerned about the lack of access to the Inquiry hearings, both for themselves and for the public, and that the Inquiry's approach to the restriction of cover names and its refusal to publish photographs of UCOs and the names of all groups spied upon will mean that many who may have relevant evidence to give will not know to come forward. It is telling that neither 'Lizzie' nor 'Sara' would have known to come forward if the Inquiry had not contacted them. Other women who have had relationships have been identified, because people who know them – or of them – are already core participants in the Inquiry. It is very likely that there are others, especially where cover names have been restricted, who will never know to come forward. This matters greatly because the Inquiry's ability to assess the extent

of the abuses that occurred is limited if those who would be able to bring those abuses to light cannot do so.

296. It is profoundly wrong to rely on the assertion of individual officers that they did not engage in relationships when we know that officers have already lied about this e.g Straven. As the women have repeatedly emphasised, being in a long term or apparently happy marriage is no guarantee that officers did not betray their wives and engage in deceptive relationships while undercover.
297. At the heart of what happened to the women lies institutional sexism. This is a complex issue that requires an exploration not just of the mind-set of the men involved in the undercover units but also of the institutional culture that developed and operated and how the two interrelated. But that exploration does not take place in a vacuum. The assessment of evidence, especially the testimony of witnesses, depends upon evaluation and judgment, both of which are profoundly influenced by a tapestry of experience and belief, which are not objective. That subjectivity affects not only the assessment of whether what the witness describes discloses sexism, but also the credibility of the witness himself. The women fully endorse the points made in the opening statement on behalf of John Burke-Monerville, Patricia Armani Da Silva and Marc Wadworth in respect of race. They apply equally in respect of sex.
298. The women have already expressed their deep concern that the Inquiry does not have the expertise and breadth of experience to tackle this issue in a truly penetrating way. That concern comes from the very narrow life experience of the Chair, which means that he has never had to confront these issues in his life or his work, as corroborated by his having to reflect on his expressed assumptions about a lengthy marriage making it unlikely that a UCO would have engaged in sexual relationships whilst undercover. The Chair's background is typical of the higher judiciary. Like many judges he has been a member of the Garrick Club, which expressly excludes women from membership, and no doubt does not see this as a problem. But as Baroness Hale stated in 2015 of many of her colleagues who also belonged to the Garrick, and did

not see what all the fuss is about, this is "quite shocking". She went on to observe that judges "should be committed to the principle of equality for all."¹⁶

299. The women's concerns also come from a lack of sensitivity in the Inquiry's failure to recognise the urgency of the need for disclosure in the case of the women; in the manner in which 'Lizzie' and 'Sara' were notified that men they had intimate relationships with were undercover officers; and the manner in which it placed pressure on the women who had relationships with Carlo Ner not to disclose his real name; and the stark contrast between the time taken by the Inquiry and care shown for the privacy and concerns of former UCOs, as compared with the lack of time taken and care shown for those same interests and concerns of the non-state core participants

300. The women would again urge the Chair to seek assistance from those with experience and expertise on the issue of sex discrimination and bias – not only at the "lessons to be learnt" stage, but crucially at the fact-finding stage. The Chair has mistakenly assumed that fact finding is a wholly objective process.

301. Even if the Chair genuinely believes that he can reach an objective judgment on the facts, he should be open to the possibility that his experiences in life and the beliefs they have given rise to will shape his judgment as they will for any person, and that those experiences do not give him the monopoly on truth. He should be open to the possibility that others with different life experiences might be able to see things he simply cannot, and that adding these different perspectives to the mix might help the Inquiry to get to the truth. Openness to the possibility is all the more urgent in this Inquiry because of the one-sided untestable accounts that will inevitably be received from the police because of the restriction orders granted to the officers.

¹⁶ <https://www.theguardian.com/world/2015/jul/06/garrick-club-votes-to-continue-with-ban-on-women-members>

302. Were the Chair to accept this possibility and proceed accordingly the Inquiry would unquestionably regain a measure of credibility and the process could begin of restoring the women's trust in it.
303. As stated, the women remain involved because they are impelled to know the truth and stop this happening again to other women. But the cost of their doing so is incalculable and it is important that the Inquiry fully understands this. Some women have already suffered the deep distress of repeatedly reliving the deception to which they were subjected. They have been forced to discuss matters deeply private and personal, with lawyers and psychiatrists. With this Inquiry they face this prospect all over again. They would, of course, much rather not do this. It is already incredibly painful and exposing. The process of making this Opening Statement has been deeply traumatising. It is going to get much worse. They have already experienced so much stress and distress because of the way the process has unfolded. For those women who have not been able to pursue a remedy against the police resulting in compensation or an apology, this Inquiry is the only available avenue of redress. For those women who were deceived by Mark Kennedy they have had to go through the stress of preparing this Opening Statement in the lead up to the 10 year anniversary of their discovery of the truth about him, which occurred on 21 October. This simply underscores just how long it has taken to get to this point.
304. All the women need to be shown by the Inquiry that it recognises and appreciates what they are going through in order to help this Inquiry get to the truth. They need the Inquiry to press ahead with disclosure and not keep them waiting any longer and to this end they seek full disclosure of all records on file about them and of any and all policies or references to intimate /sexual relationships by these units.
305. At the outcome of this Inquiry and to make sure this never happens again they seek a recommendation:-
- a. that the law is changed to prohibit undercover officers from engaging in intimate sexual relationships while in their undercover persona;

- b. that the police be required to suspend an officer and inform anyone deceived into a relationship by an undercover officer as soon as they become aware of the relationship.

**PHILLIPPA KAUFMANN QC
MATRIX CHAMBERS**

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BIRNBERG PEIRCE, HICKMAN & ROSE, HODGE JONES & ALLEN

26 OCTOBER 2020