

IN THE UNDERCOVER POLICING INQUIRY

Before Sir John Mitting

CLOSING SUBMISSIONS FOR T1P3 ON BEHALF OF

CELIA STUBBS

REPRESENTED BY BHATT MURPHY SOLICITORS

1. Celia Stubbs was the partner of Blair Peach, who was killed by a police officer striking a blow to his head during a protest against racism in Southall in April 1979. A photograph of Blair Peach is at DOC020. The circumstances of his tragic death and the sustained cover-up that followed it are told in Celia Stubbs' statement and were set out in the opening statement to part 2 of this tranche of the Inquiry. It is a story, ultimately, of police officers, and the Metropolitan Police, colluding and conspiring to conceal the true circumstances of Blair Peach's death, and to evade accountability.

2. At the conclusion of this module, the central conclusions invited by Celia Stubbs are:
 - The SDS, on behalf of Special Branch and the Metropolitan Police, targeted and covertly gathered intelligence on Celia Stubbs and the campaign for justice concerning Blair Peach over a period of decades.
 - The purpose of gathering such intelligence had nothing to do with public disorder; it was solely concerned with protecting the Metropolitan Police from criticism, and its officers from justice. The intelligence was, as a matter of fact, used for that purpose.
 - The deployment of undercover officers and gathering of intelligence with that purpose was wholly unjustified.
 - The targeting of any peaceful justice campaign by undercover officers would be wholly unjustified, but it was particularly duplicitous and abhorrent in circumstances that the Metropolitan Police knew, full well, that Celia Stubbs

and the Blair Peach campaign was seeking to uncover a grave injustice, and the true circumstances in which Blair Peach was killed.

3. The truth about the killing of Blair Peach, and the fact that the Metropolitan Police had known the truth all along, only became public knowledge following the publication in April 2010 of the reports of Commander Cass, which had been written some thirty years earlier. The reports were released with the Metropolitan Police stating that *“fourteen witnesses said they saw a police officer hit Blair Peach and ... there is no evidence which shows he received the injury in any other way. This of course is and has always been a grave concern to the Met. ... We acknowledge the stress, suffering and upset his family and friends must have felt at the time of his death, and subsequently.”*¹ It certainly was not a *“grave concern”* to the Metropolitan Police in the 1980s when the reports, and the truth, were concealed. At that stage, the Metropolitan Police was perfectly content for the Inquest to be misled, and the responsible officers to evade justice. The publication of the report offered some small measure of truth, but it was far too late to achieve any measure of accountability.

4. In the decades between Blair Peach being killed and the publication of the Cass Reports Celia Stubbs had campaigned for truth and justice. With friends of and teachers who worked with Blair Peach, she established and the ‘Friends of Blair Peach Committee’ (‘FBPC’). Her campaigning was valiant and it was dignified. It was entirely peaceful, always, and pursued the means of peaceful campaigning and recourse to the rule of law. She also supported other people who were campaigning for justice and seeking police accountability. She was a founding member of the charity, INQUEST, which still exists today and every year supports hundreds of bereaved families in seeking justice for their loved ones who have lost their lives in police and prison custody, immigration detention, mental health settings, and involving multi-agency failings.² She was also a member of the Hackney Community Defence Association and Colin Roach Centre. As she says in her statement, *“All of these campaigns have been about strengthening civil society, campaigning on issues like legal aid, lawyers’ groups and Parliamentary lobbying.”*³

¹ See <https://www.met.police.uk/foi-ai/af/accessing-information/met/investigation-into-the-death-of-blair-peach/>

² <https://www.inquest.org.uk/about-us>

³ UCPI0000034309/19, para 54

5. Celia Stubbs now knows that, notwithstanding her peaceful and lawful pursuit of truth and justice, she was the subject of repeated intelligence gathering by Special Branch, including by the undercover officers of the SDS. The fact that the state was deploying resources to gather intelligence on her, and treating her as if she was a criminal or a threat to law and order, is, to Celia Stubbs, extremely distressing. So, too, is the content of much of the reporting, which is demeaning and dismissive. Celia Stubbs was seen by Special Branch as nothing more than "*a mere propaganda tool*" for the left. That she may have been a victim pursuing a just cause of accountability for a Metropolitan Police Officer killing her partner did not register with Special Branch.
6. The questions which loom large for Celia Stubbs, and which the terms of reference for this Inquiry demand an answer, are: Why were undercover officers deployed to gather intelligence on Celia Stubbs? And, to what end?
7. The picture which has emerged is that the Metropolitan Police in the 1980s and, it appears, in the years since, has maintained an intense and determined interest in police accountability groups and campaigns for justice in respect of wrongdoing by police officers. It pursued that interest through Special Branch. That interest had nothing to do with fear of public disorder or fighting crime; it had everything to do with the Metropolitan Police and Special Branch perceiving accountability and justice as a nuisance and a threat. Intelligence was gathered by Special Branch on police accountability groups and justice campaigns to help the Metropolitan Police respond to that perceived threat.
8. The SDS and its undercover officers targeted Celia Stubbs and the FBPC in order to serve that intense interest of Special Branch in police accountability groups and justice campaigns. The deployment of and targeting by undercover officers was not the subject of any formal or rigorous process of careful selection and justification. Undercover officers were Special Branch men who knew what Special Branch (and, indeed, the Security Services) were interested in. And Special Branch were interested in police accountability groups.
9. Targeting a campaign for justice such as the FBPC could never be lawfully justified unless there was some reason to consider that the campaign was conspiring to perpetrate significant crime. To target the campaign to serve the interests of Metropolitan Police in police accountability groups in general and to frustrate access to the truth in this specific instance was wholly unjustified.

10. Celia Stubbs was also a member of the SWP, and her interests in the Inquiry include the targeting by the SDS of the SWP and left-wing groups generally. However, those matters will be the subject of submissions by other core participants, including the co-operating group of non-state core participants, and these submissions on Celia Stubbs' behalf will focus on the targeting of herself and the FBPC. It is also evident that SDS interest in Celia Stubbs prior to Blair Peach's death was only in passing, whereas it was in relation to her campaign for justice that interest intensified.
11. These submissions proceed by addressing the following questions, each of which are required by the terms of reference to be answered by the Inquiry:
 - a. How were Celia Stubbs and the FBPC targeted by the SDS?
 - b. What was the motivation for targeting Celia Stubbs and the FBPC?
 - c. What was the effect of the undercover policing targeted at Celia Stubbs and the FBPC?
 - d. Was the undercover policing of Celia Stubbs and the FBPC justified and lawful?

A. How were Celia Stubbs and the FBPC targeted by the SDS?

12. A timeline of the SDS reporting on Celia Stubbs and the Blair Peach campaign is set out in a table annexed to this submission. The timeline highlights what is now known of the activities of SDS and Special Branch in regard to Celia Stubbs and the FBPC, and when and how evidence was disclosed to Celia Stubbs by the MPS, either by the UCPI or on her own motion via a Subject Access Request. The timeline demonstrates that as a NPNSCP Celia Stubbs has made an important contribution to the effectiveness of the Inquiry.
13. The gathering of intelligence on Celia Stubbs, by the SDS and Special Branch more generally commenced in the 1970s, intensified after 23rd April 1979, and continued at least into the 1990s. It followed not only her campaign in respect of the killing of Blair Peach, but also her involvement in other justice campaigns, including in founding INQUEST and her involvement in the Hackney Community Defence Association and Colin Roach Centre. In respect of Celia Stubbs, the intelligence gathering only started in earnest after Blair Peach was killed.

14. Both Celia Stubbs and Blair Peach were the subject of Special Branch registry files prior to Blair Peach's death in 1979.⁴ Celia Stubbs also appeared in a limited number of SDS reports, with her reported as being present at the inaugural public meeting of the Hackney Community Relations Council in August 1976⁵ and a meeting of the International Socialists in July 1976⁶. Two Special Branch reports of 1978 noted details of Blair Peach's car and relationship with Celia Stubbs, and also an incident of Celia Stubbs, wearing an Anti-Nazi League lapel badge, being assaulted by two members of the National Front and suffering bruises and lacerations to her face.
15. However, following Blair Peach's death, the subsequent campaign for justice was immediately the subject of intense scrutiny and SDS reporting. The Blair Peach campaign features in various SDS reports, such as reports of a SWP meeting on 26th April 1979 urging attendance at a "*peaceful vigil*,"⁷ and a meeting of 3rd May 1979 referencing the SWP conducting its own investigation.⁸ On 23rd May 1979 the SDS provided a list of persons present at a demonstration regarding Blair Peach's death organised by the Indian Workers Association.⁹
16. On 30th May 1979 a SDS report attached a leaflet produced by the FBPC.¹⁰ The leaflet described that answers were sought to the questions "*Who killed Blair Peach and why?*", "*What were the activities of the police, especially the Special Patrol Group, in Southall on April 23rd?*", and, "*What orders were given and by whom?*". The leaflet suggested actions such as phoning a local radio station, writing to the local newspaper, contacting a local MP, and organising pickets.
17. A report of 4th June 1979 noted a connection between the FBPC and the SWP.¹¹ Several reports referenced plans for pickets at police stations and at the inquest, some listing those that were in attendance.¹²

⁴ Celia Stubbs RF/402/74/481 and Blair Peach RF/402/78/251

⁵ UCPI0000010769

⁶ UCPI0000010779

⁷ UCPI0000021207

⁸ UCPI0000021218

⁹ UCPI0000021270

¹⁰ UCPI0000021297

¹¹ UCPI0000021313

¹² E.g. 1st October 1979 (UCPI13435) and 15th October 1979 (UCPI-13468).

18. A source of significant distress for Celia Stubbs is that undercover officers of the SDS were present at Blair Peach's funeral on 13th June 1979. A report of 13th July 1979 listed a number of individuals present at the funeral¹³ and other reports included photographs of some of those in attendance.¹⁴ According to the gist of the closed statements one officer describes attending the funeral.¹⁵
19. An SDS report of 28th July 1980 reported that the FBPC were "*at present attempting to form a national co-ordinating body with other such committees concerned with the cases of 'State brutality' by the police and prison authorities*".¹⁶ Special Branch officers preparing intelligence reports were aware of and disseminating information relating to the strategies pursued by Celia Stubbs. A Special Branch report of 1st February 1982 describes her as attempting to provoke the police into commencing libel proceedings.¹⁷
20. It is also apparent that SDS interest in the campaign regarding the circumstances in which Blair Peach was killed did not diminish even over many years that followed. A report of 10th April 1989¹⁸ on a meeting of the 'Blair Peach 10th Anniversary Committee'¹⁹ – is stated to be from "*a secret and reliable source*" which indicates an undercover officer.²⁰ That is a report that was obtained not by the Inquiry, but by Celia Stubbs herself, via a Subject Access Request.
21. A report of 28th July 1998,²¹ with the heading "*touchy subject*", reports that April 1999 represented the 20th anniversary of the death of Blair Peach and to commemorate the event local trade unions were organising a large rally and demonstration which, it was said, would "*be presented with a strong anti-racist/anti-police flavour*." The report, prepared by undercover officer Mark Jenner, also suggests that the event would attract "*anti-police type groups*" and "*the potential for disorder will be significant*", albeit disorder would have represented a departure from the preceding 20 years of peaceful campaigning. There was, of course, no disorder.

¹³ UCPI0000021047

¹⁴ E.g. UCPI0000013532, UCPI0000013547 and UCPI0000013539

¹⁵ UCPI0000034307/7, paragraph 36

¹⁶ UCPI0000014149/1

¹⁷ DOC079/2

¹⁸ DOC072

¹⁹ SARDOC1

²⁰ See, for example, paragraph 35 of the statement of Geoffrey Craft: MPS-0747446/16

²¹ MPS-0001219

B. What was the motivation for targeting Celia Stubbs and the FBPC?

22. The Inquiry is required by its terms of reference to “*examine the motivation for ... undercover policing operations.*”

23. At the conclusion of the evidence of this part of the Inquiry, it is evident that the targeting of Celia Stubbs and the FBPC by the SDS was motivated by a desire to serve Special Branch’s general interest in ‘police accountability’ groups and campaigns for justice. That interest in police accountability groups was driven, in part, by Special Branch viewing police accountability as ‘anti-police’, and anything ‘anti-police’ (or, indeed, anti-racist, or feminist, or pro-gay rights) as extremist and subversive. It was driven by a desire to protect the police from accountability and to defend the police in relation to legal proceedings arising from their actions.

24. That conclusion follows from consideration of the following:

- i. the interest of Special Branch in “police accountability groups”;
- ii. the interest of Special Branch in the FBPC, in particular;
- iii. the use to which evidence gathered on the FBPC was put;
- iv. how SDS targeting sought to serve the general interests of Special Branch; and,
- v. that reporting on FBPC could not have been incidental to other objectives.

(i) *The interest generally of Special Branch in “police accountability groups”*

25. It is important to note two points. First, in the documents referred to in this section, the Metropolitan Police has used the term “police accountability groups” to refer to both those groups concerned with the general concept and mechanisms of accountability and those individuals – or groups working with individuals – seeking accountability and legal redress for specific incidents. These individuals and groups were either pursuing or were subject to formal legal processes and can be more accurately described as ‘justice campaigns’. Second, to recognise, at the outset, that the disclosure sought by the Inquiry from Special Branch, as opposed to the SDS in particular, has been very limited. The Inquiry has not sought full disclosure of the interests of Special Branch in police accountability groups and justice campaigns. Irrespective of the merits or otherwise of that approach, it is inevitably the case that what has been revealed so far in this Inquiry can be no more than glimpses behind the veil of the interests of Special

Branch which the SDS sought to serve. Nonetheless, those glimpses are sufficient to provide a clear picture of Special Branch having an avid and self-serving interest in police accountability groups.

26. An important insight is provided by an extensive 44-page Special Branch report of January 1983 describing the actions of the then Labour-controlled Greater London Council (“GLC”).²² The report describes in detail the (democratic) activities of the GLC in respect of seeking police reform and supporting groups seeking police accountability. The report reveals not only the intense interest held by Special Branch in police accountability groups, but also that the interest was highly political, and largely driven by the wholly misconceived idea that police accountability was somehow subversive and posed an existential threat to the police.

27. At that time, each police area nationally was governed by a local Policy Authority comprising local councillors and magistrates, save for the Metropolitan Police that was governed by the Secretary of State serving as the local Police Authority. The GLC believed that the Metropolitan Police should also have accountability to local communities, in the same way as the rest of the country. It campaigned to that effect, and sought to take steps to have a role in the oversight and direction of the Metropolitan Police, including by supporting local police accountability groups and establishing borough police committees in each London borough. It was intended that these committees undertake steps such as *“monitor the policies and practices of the local police...”, “develop crime prevention strategies”, “monitor the police complaints procedure”, and “exchange information and views on local police activity with local independent monitoring groups”*.²³ Irrespective of the merits of the GLC’s view, it was pursued with democratic legitimacy and was neither subversive nor extremist. (Indeed, today, the Metropolitan Police Service falls under the supervision of the Mayor’s Office for Police and Crime which serves the same role as a Police and Crime Commissioner and which replaced the previous area Police Authorities; that is, the position advocated by the GLC).²⁴ Notwithstanding, Special Branch took a keen interest. As is stated, in terms, *“[Special Branch] has attempted to follow the campaign in detail and in so doing*

²² MPS-0748355/1

²³ See the terms of reference at MPS-0748355/17, para 3.1

²⁴ Section 3 of the Police Reform and Social Responsibility Act 2011

has collected a mass of information about the personalities and groups involved,²⁵ and the report was *“an attempt to analyse and interpret that information”*.²⁶

28. Undoubtedly, the message of the report is that there was something malevolent in the steps taken by the GLC intended to seek police accountability, and in the police accountability groups it supported. However, identification of the supposed malevolence of the GLC's activities which warranted the gathering of the *“mass of information”* and the detailed report is difficult to decipher. The report is scathing as to the use of the public funds of the GLC various reports and committees of enquiry, which is described as an *“irresponsible and profligate use of public money,”*²⁷ but the use of public funds by the GLC can hardly be a matter for Special Branch. It is entirely dismissive of the GLC's intentions, describing that its *“innocuous meetings with their solemn self-imposed responsibilities and grandiose self-perpetuating designs were merely the external trappings of the Police Committee's work”*.²⁸

29. The report does describe that there were *“various extremist influences operating within the GLC and its two police bodies”*. But, these *“extremist influences”* are simply references to various left wing campaign groups. Kate Allen was described as a *“militant feminist”* (3.8), and the then Leader of the GLC, John Austin-Walker, was considered extremist as he was affiliated to CND and *“extremist-influenced protest groups [such] as Bexley Campaign Against Racism and Fascism, and the Anti-Nazi League”*. In respect of the Greenwich committee, Special Branch struggled to find any *“extremist influence”* but did not doubt it would *“become a focal point for militant, anti-police views at least”* ([3.11]). Other branches were condemned for having members who were *“an outspoken Trotskyist and a protagonist of black rights”* (3.14), *“a member of the left-wing Tribune Group and a fervent supporter of ‘Gay Rights’ as well as being a self-confessed lesbian”*, or *“very adept at spreading distrust of the police and ... successful in organising various local defence committees on behalf of black prisoners”* (3.14). The report described the *“wont”* of the Islington Committee *“to invite to its meetings representatives of radical groups – homosexuals, feminists and the like – for the purpose of hearing their views and advice.”* The report also described GLC attempting to further its campaign by encouraging *“the growth of a series of totally*

²⁵ Emphasis added

²⁶ MPS-0748355/5, para 1.2

²⁷ MPS-0748355, para 2.10

²⁸ MPS-0748355/11, para 2.10

unofficial and independent bodies whose sole function would be to watch and report on the work of the Metropolitan Police.”

30. Celia Stubbs herself is mentioned in the report in her capacity as part of the management committee of INQUEST, which featured in the report given its interest in police accountability. As noted in paragraph 25 above, Celia Stubbs and INQUEST were concerned primarily with the rights of individuals seeking to call the police to account for their actions in relation to specific incidents which were the subject of ongoing legal processes. Nevertheless, as characterised by Special Branch, INQUEST was formed *“in May 1981 at the height of an orchestrated campaign which sought to infer that all deaths in police or prison custody should be seen as evidence of malpractice”*.²⁹ Celia Stubbs and her colleagues were evidently to be viewed by Special Branch with suspicion as having been *“closely associated ... with the SWP and ... currently seen as Trotskyist sympathisers at least.”*
31. The conclusion drawn by the Report was that *“the campaign for police accountability in London is significantly influenced by political extremists whose motives are questionable.”* As to the perceived threat posed by these groups: *“In the short term, they are clearly intent upon causing mischief for the Metropolitan Police Force; in the long term they patently aspire to control it.”* Thus, Special Branch feared both *“mischief”* and, ultimately, considered there to be some sort of existential threat. The Report’s concluding remark is that *“Whatever their motives, their efforts have nothing to do with the Rule of Law or the true interests of the people London whom they claim to serve.”* The misplaced and intense interest, and distrust and fear of police accountability groups, is evident. It clearly strayed far beyond any proper policing role and into an evaluative assessment of legitimate democratic processes, and the rule of law, largely founded on Special Branch’s own prejudiced view of the political left, its dislike of campaigns around racism and gay rights, and a distaste for accountability.
32. A number of observations can be made about this document. One is that ‘subversive’, whatever the niceties of its definition, had, in practical terms, become synonymous with anything that Special Branch felt to be of nuisance, and anything relating to the political left wing and anti-racist and pro-gay rights campaigns. Another is that the determined

²⁹ MPS-0748355/39

briefing against a democratically elected body – the GLC – was an affront to local democracy.

33. However, the key point for the purposes of this submission is that it reveals the purpose of targeting police accountability groups, and justice campaigns, as one of protecting the force from scrutiny or criticism. The Inquiry has also disclosed an accompanying minute sheet which reveals, in direct and explicit terms, the purpose of Special Branch's interest in police accountability groups, as well as some differing views as to the propriety of that interest. Commander J Wilson wrote (28th March 1983):

*In the light of the Commissioner's (and his senior officers') need to be kept informed of future developments, the DAC and I have discussed the SB position about these monitoring groups. It is clear that the Branch, in conjunction with the Security Service, is the only department capable of pursuing further enquiries. It is obvious that these groups are interested only in our faults and that a power base is being built from which attacks on the police can be launched. In these circumstances **it is right that our senior officers should be briefed in order that they can adequately respond to criticism. These views were expressed by the Commissioner at his Conference with Commanders on 25th March last.** There is also a very important public order aspect.*

34. It is unclear whether the reference to Special Branch being the “*only department capable of pursuing further enquiries*” is a reference to the undercover capability of the SDS. It is, however, of profound significance that the stated purpose of the intelligence gathering was to enable “*senior officers*” to “*adequately respond to criticism*”, and that view was expressed not only by Commander J Wilson, but had been “*expressed by the Commissioner at his Conference with Commanders.*” The final reference to a “*public order aspect*” is either a reference to an ancillary purpose, or, more likely, a useful ‘front’ for intelligence gathering that had no legitimacy or justification.

35. Others held a different view, Detective Chief Superintendent Greenup considered it useful for officers joining interviews and discussions to receive a “*comprehensive briefing*” on the “*particular stance ... and other background information*” on the individuals involved in such groups, but that it was more usefully a task for A7 rather

than Special Branch.³⁰ Commander (Ops) Phelan considered that any new non-Special Branch “unit to assist in answering criticism of the police” should “restrict itself to gathering information from overt sources only. The gathering of covert intelligence should not be attempted ...”.³¹ It is not clear whether the same limitation was thought by Commander Phelan to apply to Special Branch, although DAC (‘C’) (SB) Hewitt followed the minute by observing that “this subject is fraught with problems and we must take care not to stray beyond the new guidelines for Special Branch.”³²

36. The minute sheet concludes with Chief Superintendent Greenup asking that “SB(R) please open ‘secret pink’ file entitled “Police Monitoring Groups: Special Branch Liaison with A7(4)...”.³³

37. Separately, the report came to the attention of Sir Hayden Phillips in the Home Office, who reported to Mr Hewitt his “very serious concern at the breadth and tone of, and market for, that report.” Mr Hewitt was said to acknowledge that “he has pushed to the limit a ‘broader concept of public order intelligence’”. This is meaningless as expressed, and dangerous in implication.”³⁴ Ultimately, however, Sir Phillips and his colleagues “strongly doubt[ed]” that “they will be tempted to paint on such a broad and sensitive canvas again”, and it was left at that. That, it transpires, was naïve and ignorant as to Special Branch’s intense and longstanding interest in police accountability groups and justice campaigns.

38. Centrally, it is perfectly clear that the Special Branch interest in police accountability groups generally and justice campaigns specifically was one of assisting the force respond to criticism and legal action respectively. Although a 1983 document, it reflects an interest which had existed in the preceding years. There are SDS reports concerning the death of Stephen McCarthy in 1971³⁵ as well as BASH and the Knight Defence Campaign in 1981.³⁶ The SDS annual report for 1981 listed the Campaign for Police Accountability in Camden as a group reported on. There is also no other credible explanation in the documents for the targeting of such groups by the SDS and

³⁰ MPS-0748422/6

³¹ MPS-0748422/9

³² MPS-0748422/9

³³ MPS-0748422/11

³⁴ UCPI0000035096/1

³⁵ MPS-0739483/2

³⁶ UCPI0000016813; UCPI0000016531

Special Branch which preceded January 1983 or, indeed, in the decades that followed. There is nothing to suggest that the self-serving interest of Special Branch in police accountability groups was not an aberration of early 1983; it was an interest which existed both before and after. For example, we know (albeit only because Celia Stubbs was personally involved) that INQUEST was frequently reported on by Special Branch.³⁷

39. One apparent 'front sheet' to a Special Branch report has the basic details of INQUEST under the heading "Police Accountability Groups."³⁸ It appears, then, that Special Branch had (perhaps still has) a file with its collated intelligence from overt and covert sources on "police accountability" groups. That reflects the intense interest of Special Branch in such groups, and the "*mass of information*" held by Special Branch, as described in the January 1983 report.
40. In future tranches the Inquiry will hear evidence that undercover officers targeted a number of justice campaigns and police accountability groups, no doubt at the behest of and perceived advantage to Special Branch. There are already glimpses of how the targeting of justice campaigns continued and expanded, beyond the Blair Peach campaign and the period with which this part of the inquiry is concerned. A report of 25th July 1995 described the first public meeting organised by the Colin Roach Centre which was chaired by Celia Stubbs and launched the '*Justice for David Ewin campaign*'.³⁹ The Colin Roach Centre was a campaign group on issues of police injustice and David Ewin was a man shot by police in February of that year. Curiously, the report stated that "*there was no disorder and no arrests were made*", not that disorder or arrests were ever the remotest of possibility given the nature of the group. The closest thing to disorder was what was described as the "*warm round of applause*" which met the criticisms of the police complaints process made by Deborah Coles of Inquest.

³⁷ See the reports of 22nd January 1982, 23rd February 1982, 8th March 1982, 15th November 1983, 21st December 1989, MPS-742216

³⁸ [SARDOC9]

³⁹ MPS-742216

41. Also reported on is Celia Stubbs' involvement in the Hackney Community Defence Association (HCDA)⁴⁰ and in the campaign regarding the conviction of Malcolm Kennedy.⁴¹

(ii) The interest of Special Branch in the FBPC, in particular

42. As is evident from the repeated reporting on Celia Stubbs and the FBPC as described above, the interest of Special Branch in police accountability groups certainly included the campaign for justice pursued by the FBPC. It may well be that the targeting of the FBPC was an early example of targeting of a justice group.

43. The controversy surrounding Blair Peach's death would inevitably have been of concern to the Metropolitan Police and the Home Office. Indeed, Dr Graham Smith has unearthed from the National Archives a note of a discussion between the Prime Minister and Home Office on 25th April 1979, in which the Prime Minister complained that *"the Southall incident had been the top story yet again on the BBC 1.00 news"* and it *"was important to get this out of the headlines."* The Home Secretary thought his press conference of that day contributed to that objective, albeit the Prime Minister *"felt that the fewer press conferences the better for the present."*⁴² Sir Charles Pollard, the officer in charge of policing at Southall on the day in question describes it as *"a real disaster for A8 and the Metropolitan Police"*⁴³ before going on to state that the *"event is seared on my mind"*.⁴⁴ His statement also notes that there would have been *"big meetings"*⁴⁵ with the Home Office and comments on the rarity of preparing a written report for the Home Office as opposed to the routine post demonstration reports prepared after other demonstrations.⁴⁶ It is also of note that in forwarding the SDS annual report for 1979 and seeking approval for its continuance from the Home Office it was reported by the Assistant Commissioner at New Scotland Yard, in his letter of 7th March 1980, that the *"focal point"* of so-called *"extremist activity"* had been the General Election held in May 1979 and that the *"culmination of the virulent anti-fascist demonstrations was the death of the Anti-Nazi League supporter Blair Peach and the*

⁴⁰ E.g. MPS-0245835

⁴¹ E.g. MPS-0246124

⁴² New document from the National Archives

⁴³ MPS-0748347/21, para 55

⁴⁴ Ibid, para 72

⁴⁵ Ibid, para 63

⁴⁶ Ibid, para 80

subsequent campaign against the Police".⁴⁷ It is of note that Blair Peach's death and the "*subsequent campaign against the Police*" was reported by the SDS to be a focus, and featured prominently in the report of the SDS activities to the Home Office. The Home Office responded on 1st April 1980 by "*noting the continuing value of the squad*" and authorising its continuance.⁴⁸

44. It is also striking that the gathering of intelligence by undercover officers on the Blair Peach campaign lasted over such a lengthy period. As above, even in July 1998 it was being reported as a "*touchy subject*". Thus, two decades on from Blair Peach's death, and campaigning which had, sadly but in truth, made little progress in achieving justice, the campaigns seeking to establish the truth of the circumstances in which Blair Peach was killed were still the subject of reporting by undercover officers. Evidently, Special Branch's interest in the Blair Peach campaign was an enduring one.

(iii) *The use to which evidence gathered on the FBPC was put*

45. We have nothing like a full answer as to the uses to which information gathered by the SDS on the FBPC was put, as the Inquiry has not sought disclosure of that from Special Branch (or from the Home Office more generally).

46. There are, however, some examples appearing within the disclosure of gathered intelligence being put to use. There is no example of any of the gathered intelligence in respect of Celia Stubbs or the FBPC being of any meaningful utility for any public order purpose. There are, however, examples of gathered intelligence being used to assist the police force in responding to the FBPC's attempts at achieving justice and accountability.

47. First, a Special Branch report of 19th June 1979 is stated to concern those persons, known to Special Branch, who had "*written statements to Police concerning the death of Blair Peach...*". An Appendix to the document is described as a list of all persons who had made statements to the police, together with "*a brief resumé of information concerning the individuals, recorded in this Branch.*" It is a collation of the key information held by Special Branch on all individuals giving evidence in respect of Blair Peach's death. The document does not spell out *why* Special Branch was collating

⁴⁷ MPS-0728963/2, paragraph 3

⁴⁸ MPS0728963/1

and reporting information it held on all individuals who had given statements to the police, but it is difficult to see any motivation other than that it was looking for opportunities to discredit accounts given of police brutality which resulted in Blair Peach's death. It certainly has nothing to do with public disorder, and everything to do with the investigation into Blair Peach's death.

48. Second, some months later, in April 1980, another Special Branch memorandum recorded a meeting with the Deputy Assistant Commissioner of operations of the Metropolitan Police "regarding the Friends of Blair Peach Committee" and consideration being given to applying for a High Court injunction "to prohibit the further publication of the names of [Special Patrol Group] officers allegedly involved in Peach's murder."⁴⁹ As described in the memorandum, the Deputy Assistant Commissioner was told that the FBPC was "an umbrella organisation dominated by the SWP and ANL." A number of "leading figures" were identified, including Celia Stubbs, as was the location from which the committee operated and where printing for the committee was carried out. This was around the time of the inquest regarding Blair's death. It is clear that SDS information was circulated by Special Branch to a very senior officer within the MPS to assist in its response to the actions of the Friends of Blair Peach Committee and whether a High Court injunction would be sought. It is also important to note that this was being filtered back to officers: a report on the meeting of Inquest in Jan 1982⁵⁰ refers to Celia Stubbs being bitterly disappointed that the MPS did not fall into her trap of taking proceedings against her for the "outrageously libellous posters naming the 6 SPG officers as the murderers of Blair Peach".

49. That Special Branch maintained files on lawyers who at one time represented Celia Stubbs - Sir Stephen Sedley and Mike Seifert – adds to the picture of covert intelligence gathering being used for purposes other than protecting against public disorder. Sir Stephen Sedley, now a retired Court of Appeal judge, represented Celia Stubbs at the inquest into Blair Peach's death. He is described in a Special Branch report of 3rd February 1981 as having spoken at a conference on 'Racism and the Police.'⁵¹ Sir Stephen is ascribed a registry file number and was plainly of interest to Special Branch. It appears that Mike Seifert – a solicitor who represented Celia

⁴⁹ MPS-0733406/1

⁵⁰ SARDOC8

⁵¹ UCPI0000016366

Stubbs— was also the subject of a registry file.⁵² The relationship between lawyer and client is or ought to be sacrosanct. To Celia Stubbs it is disturbing that those who represented her and from whom she expected to receive confidential advice were the subject of surveillance. It should also trouble the Inquiry, not least as it demonstrates that there were no bounds at all to the intelligence gathering that Special Branch and SDS felt to be acceptable.

(iv) How SDS targeting sought to serve the general interests of the Metropolitan Police;

50. In the evidence as it has emerged there has been no pretence that the interests of the SDS were limited to public order. HN34 Geoffrey Craft described that the key role for SDS was public order⁵³ but also acknowledged that the SDS “*became involved in, and was largely supportive of, the Security Services responsibility for subversion*” and that information was gathered for the Security Service.⁵⁴ HN218 Barry Moss described that the SDS had a “*dual function*” of obtaining intelligence to assist the MPS in dealing with public disorder, and a second purpose (described as ‘ancillary’) of assisting the Security Service in the execution of their duties by providing intelligence on groups of interest.⁵⁵ It also, inevitably, also served the more general interests of the Metropolitan Police and Special Branch. Whether or not the SDS was conceived as a response to concerns relating to public disorder, it quickly morphed into a source of information to serve the interests of Special Branch more generally, as well as the Security Service.

51. It appears that the tasking of the SDS was a mixture of (a) ad hoc and specific targeting by the Security Services and Special Branch, and (b) the SDS and its undercover officers simply having a good understanding of what intelligence those services were interested in, and gathering it. As to the former, HN244 Angus McIntosh described “*decisions as to targeting and tasking*” being taken “*by other police departments and government departments*”, and he would relay the instructions on tasking to the undercover officers.⁵⁶ As to the latter, we consider the position is accurately described by Barry Moss who described that undercover officers would need “*a good grasp of*

⁵² UCPI0000027014

⁵³ MPS-0747466/12, para 28

⁵⁴ MPS-0747466/57, para 147

⁵⁵ MPS-0747977/28, para 41

⁵⁶ MPS-0747578/13, para 39

the workings and aims of Special Branch” and, beyond that, the “direction taken by UCOs was a matter for them using their judgment and discretion”,⁵⁷ presumably with reference to the general aims of Special Branch. Counsel to the Inquiry is correct to observe that the “SDS did not operate in a vacuum,” that it was part of “a larger intelligence gathering apparatus”, and “SDS targeting decision were not out of kilter with those of the rest of the intelligence gathering apparatus of which the unit was a part. The targets infiltrated were of interest to Special Branch ...”.⁵⁸

52. The evidence demonstrates it as being overwhelmingly likely that there were direct instructions given by Special Branch in respect of the FBPC, and by SDS management to the undercover officers. It is so inherently unlikely that the campaigns in relation to Blair Peach’s death would feature so prominently in the 1979 annual report and the covering letter to the Home Office by the Assistant Commissioner, yet not to have been the subject of directing instructions. At the very least, Special Branch’s interest must have been clearly communicated to and within the SDS. That there was specific tasking relating to the Blair Peach campaign has been confirmed by the evidence of HN21. In his closed evidence he indicated a recollection that “*one of the management*” asked him to attend Blair Peach’s funeral, and it “*could have been Geoff Craft [HN34].*”⁵⁹

53. At the very least, the undercover officers would have had a good working knowledge of what was of interest to Special Branch, and would have been well aware that Special Branch had a keen interest in police accountability groups and the campaigns of the FBPC. It was in serving that general interest that the covert intelligence on Celia Stubbs and the FBPC was gathered and disseminated.

(v) That reporting on FBPC could not have been only incidental to other objectives.

54. It was suggested by the Designated Lawyers in the opening prior to part 1, that SDS personnel “*did not infiltrate or target justice campaigns*”, and that such campaigns were “*only referred to in SDS intelligence reports if and to the extent that they came into contact with those who were being reported on.*”⁶⁰ The suggestion appears to have

⁵⁷ MPS-0747797/13, para 23(e)

⁵⁸ CTI opening for Trance 1 Modules 2b and 2c, para 86

⁵⁹ MPS-0748062/14

⁶⁰ Day 5, page 127

been that any intelligence gathered on justice campaigns was wholly incidental to some other objective or target. Similarly, HN244 Angus McIntosh insisted that those who campaigned in relation to the death of Blair Peach “*were not reported on because they were seeking to discredit and criticise the police*” but because “*they were people who were or would have been identified by the UCOs as being activist on the public order scene.*”

55. That is so patently wrong. As above, despite having absolutely nothing to do with any public disorder, the SDS gathered information on the campaigns regarding Blair Peach over at least two decades. If the primary purpose was preventing public disorder then it was utterly farcical targeting. The reality is that it had nothing at all to do with public disorder; it was all to do with Special Branch’s intense and enduring interest in police accountability groups and the specific campaign for justice in relation to Blair Peach, to help the force respond to criticism.

56. There has been no credible explanation as to why targeting Celia Stubbs and the FBPC may have been necessary for public disorder. HN307 Trevor Butler said he “*cannot really comment on*” whether campaigners “*were reported on*” as they sought to criticise the police.⁶¹ Further, although HN244 Angus McIntosh offered a general denial of the interest in the campaign being anything other than public disorder, when it came to explaining the reporting on the funeral of Blair Peach, he said that he would not have known to what use such information would have been put, but his understanding is that it was “*for the Security Service, and for vetting, and identification/tracing*”.⁶² It clearly had nothing to do with public disorder.

57. Similarly, HN21 who was tasked to attend the funeral considered that it was “*highly unlikely*” that anything would happen at the funeral, and he never witnessed any public disorder arising from the campaign.⁶³ As to why it was that the SDS wanted to report on the funeral, HN21 described that “*part of the core business was to identify people, individuals who were connected to groups.*” In the instance of attending Blair Peach’s funeral, the motive “*was just that*” and he had not thought that there was any possibility of disorder.⁶⁴

⁶¹ MPS-0747658/21-22, para 79

⁶² MPS-0747578/34, para 98

⁶³ MPS-0748062/14-15

⁶⁴ MPS-0748062/15

58. The idea that it was incidental to public disorder is also inconsistent with the evidence as to the use to which the gathered intelligence was put, which, as above, had nothing to do with public disorder.

C. What was the effect of the undercover policing targeted at Celia Stubbs and the FBPC?

59. The terms of reference require the Inquiry to examine the “*effect upon individuals in particular and the public in general*” of undercover policing operations.

60. There has been no discernible benefit to the public arising out of the intelligence gathering on Celia Stubbs and the FBPC. That the Metropolitan Police would deploy undercover officers to target citizens who are peacefully and lawfully campaigning for justice must, inevitably, damage public interest.

61. As to the effect on Celia Stubbs, she lives in the knowledge that officers of the force who killed her partner also secretly attended his funeral, that over a period of two decades they covertly gathered information on her and wrote about her in demeaning and utterly dismissive terms.

62. In her statement Celia Stubbs says of first receiving disclosure:

*“it was extremely upsetting to see this material and to see how the police treated our actions and events that were law abiding and were simply trying to get to the truth of what happened. I was surprised by how upset and angry I felt. It seems that they lost all sense of the fact that Blair had been killed by police officers and that our distress about this was criminalised. It is hard to describe how violating this is.”*⁶⁵

63. The upset is aggravated by the terms in which Celia Stubbs is described in the Special Branch records. For example, there is a detailed Special Branch report of 1st February 1982 reporting on a 12 person meeting of INQUEST. It suggested that INQUEST only

⁶⁵ UCPI0000034309/16, paragraph 46

existed because public interest in Blair Peach's death had waned, and Celia Stubbs had "hit upon the idea of reviving it by linking up with other notorious cases of recent years", but "most of the others involved are merely looking for a cause to adhere to."⁶⁶ Another (undated) Special Branch report described that "Following the death of Blair Peach [Celia Stubbs] became a useful propaganda tool for the left-wing publicity machine. Since 1980 she does not appear to have been involved in any public order incidents. She would appear to be a member of the pressure group 'INQUEST' purely because of her association with Peach."⁶⁷ As observed in our opening for part 3, that Special Branch denigrated Celia Stubbs as being no more than a "propaganda tool" for the left wing reveals the utterly misplaced disdain in which Special Branch held Celia Stubbs and police accountability groups generally.

64. In the opening to part 3 of this tranche she explained:

Following the disclosure of the Cass report in 2010, I with other friends from the campaign felt that it had run its course. It was then I had legal advice that there was a case for the inquest to be re-opened now we had information that had been hidden from us at the original inquest in 1980. I declined this as I just could not face the publicity that this would engender. Since I have learnt about the surveillance the SDS and Special Branch have carried out on me stretching over nearly 30 years and how I have been held up as 'a propaganda tool', I have felt more distressed but also angry. To put it bluntly, police officers took my partner's life and then concealed the truth.

D. Was the undercover policing of Celia Stubbs and the FBPC justified and lawful?

65. The only suggested justification for the SDS, from its inception to this inquiry, is that it was useful for policing public disorder. That has also been the only suggested justification in respect of the targeting and intelligence gathering in respect of Celia Stubbs and the FBPC, and that the campaign was only referred to if and to the extent, it came into contact with those who were being reported on.⁶⁸

⁶⁶ SARDOC8

⁶⁷ SARDOC7

⁶⁸ As above, it was suggested by the Designated Lawyer in the opening to part 1 that such campaigns were "only referred to in SDS intelligence reports if and to the extent that they came into contact with those who were being reported on."

66. Three submissions are made in respect of the utility of the SDS to public disorder policing and the issue of justification. First, the evidence suggests that, in fact, its utility was either negligible or, at its absolute highest, modest, not least as a great deal of information could be obtained from overt sources. Others including the general group will make submissions as to the general utility of the SDS in respect of policing public disorder, but observations are made as to two aspects of the evidence of particular concern and interest to Celia Stubbs, that is, the death of Kevin Gately in Red Lion Square, and the death of Blair Peach in Southall.

67. In respect of both Red Lion Square and Southall, it is evident that information in advance was available to the Metropolitan Police from open sources. As counsel to the inquiry has observed, Lord Scarman's report into Red Lion Square makes clear that the potential for disorder was well known from sources other than the SDS.⁶⁹ In respect of Southall, the Special Branch report of 23rd April 1979 (i.e. the day of the march) gives not a hint of anything useful having come from the SDS. In fact, the only pertinent intelligence of which the SDS were aware in advance of the Southall march was concerned with the intentions of the uniformed police rather than protestors, with HN41 describing in his closed evidence that SDS managers did not want undercover officers to attend the rally at Southall, as it was known that uniformed officers were planning to "*clamp down on the demonstrations*" and dangers were "*more than normal*."⁷⁰

68. Of course, obtaining information overtly and in collaboration with the community and the groups protesting would, ultimately, be far more consistent with the approach of policing by consent. In 1981 the FBPC submitted evidence to the Scarman Inquiry into the Brixton Riots.⁷¹ The submission referred to the Metropolitan Police after Southall having unjustifiably blamed the disorder on "*outside agitators and extremists*" and suggested that the Metropolitan Police "*show[ed] a consistent and dangerous refusal to look critically at their own actions and responsibilities.*" The FBPC then said this:

Both these points illustrate what we believe have become one of the major, if not the single most significant cause behind recent large-scale disturbances in London. Rarely, if ever, do the Metropolitan Police declare publicly that they aim to police 'by consent', and what the practical policy implications of this

⁶⁹ DOC-088/10, para 13

⁷⁰ MPS-0748063/6

⁷¹ New document supplied to the Inquiry with these submissions

objective are. Rather, we have an emphasis upon the explicitly aggressive tactics of such groups as the Special Patrol Group, which are regularly defended at the highest level. The issue is highlighted, we believe, by the fact that the police 'methods' in London are nowhere the subject of public knowledge, debate and decision, even by Parliament. This in turn gives rise to the divorce that now exists between the image of themselves that the police present and the actual experience of citizens, particularly in black communities. It is our view that this is a recipe for repeated mass disturbances such as that which took place in Brixton.

69. That, we suggest, was an insightful observation, and the focus of Special Branch and the SDS on covert intelligence rather than open dialogue was part of the Metropolitan Police having lost sight of the importance of policing by consent, albeit a part unknown at the time to the FBPC. (Incidentally, the submission is also indicative of the campaign making a valuable contribution to civil society, as opposed to being anything remotely subversive, extremist, or a threat to public order).

70. Second, there must at least be a suspicion that the SDS had a harmful role in policing public disorder in frustrating or at least failing to comply with processes seeking truth and accountability when public order policing went wrong. There are, again, parallels between Red Lion Square and Southall. Given the role of the SDS, one would expect to see detailed SDS reports on both events. For example, in relation to the National Front march in Lewisham on 13th August 1977 there was a 56-page report which described, in detail, the events leading to the march and the march itself,⁷² a six-page document detailing the de-briefing of 18 Special Branch officers who had been present,⁷³ and a document detailing the views of some SDS officers.⁷⁴ In contrast, for the events in which the policing controversially led to the deaths of Kevin Gately and Blair Peach, there is nothing save for the brief report referenced above in respect of Southall. HN301 recalls being present at Red Lion Square and being punched by a police officer despite not having done anything to warrant being hit,⁷⁵ but his reports are missing. The obvious concern is that documents relating to Red Lion Square and

⁷² MPS-0733367

⁷³ MPS-0733369

⁷⁴ MPS-0732886 and MPS-0732885

⁷⁵ MPS-0742600/29, paragraph 84.

Southall were destroyed and/or not produced because they were or would have been damaging to the interests of the Metropolitan Police.

71. There was also an apparent failure to disclose documents and knowledge of the SDS and their presence at the events under investigation at Lord Scarman's inquiry, and to the inquest concerning Blair Peach's death. HN301's account of being punched for no reason was presumably not provided to Lord Scarman given that he largely praised the MPS response other than to note that he "*did not exclude the possibility of one or two incidents of the misuse of a truncheon*" (p23).⁷⁶ In respect of Blair Peach's death, it is evident from HN41's account of being "*smuggled in*" to Scotland Yard to give a statement as the "*Murder Squad*" had heard of his presence at Southall,⁷⁷ that the officers investigating Blair Peach's death were well aware of the SDS presence and likely knowledge of events, but that knowledge was never revealed in the inquest.

72. Third, and in a sense more fundamentally for the purposes of the terms of reference of this Inquiry, the targeting of and intelligence gathering in relation to Celia Stubbs and the FBPC was not motivated by or concerned with public disorder policing at all; it was, as above, motivated by assisting the police in protecting itself from criticism. If that is accepted, for the reasons set out above, then it follows that it was unjustified. No core participant has suggested that utilising UCOs for the purpose of protecting the police from criticism can possibly be justified. That is unsurprising and undeniably correct. The only suggested justification, of intelligence gathering on such campaigns being wholly incidental to reporting on public order targets has, in truth, been washed away in the evidence.

73. That, really, is the short answer to the question of justification: there is no suggestion by any core participant, or any witness, that undercover policing for the purpose of protecting the police from criticism is justified. The position was correctly put by the Home Office letter of 19th December 1984 which stated that "*It is not the function of the force Special Branch to investigate individuals and groups merely because their policies are unpalatable, or because they are highly critical of the police, or because they want to transform the present system of police accountability*".⁷⁸

⁷⁶ DOC088/29

⁷⁷ MPS-0748063/7

⁷⁸ UCPI0000004584/2, para 8

74. It was certainly not concerned with the preservation of the Queen's peace. There is no way in which targeting and gathering intelligence in relation to a campaign for justice or police accountability has anything to do with preserving law and order. It was, therefore, unlawful, as powers may only be exercised in a manner consistent with the purpose for which such powers have been granted.⁷⁹
75. There was also the significant impact upon individuals who were the subject of surveillance, such as Celia Stubbs (as described above). Although, in truth, there was no positive or acceptable purpose of the intelligence gathering on Celia Stubbs and the FBPC against which to counterbalance its harmful impact. The scale falls firmly on one side only.
76. In general terms, there are two limbs to the function and responsibilities of the police: the positive obligation to act so as to preserve the peace by enforcing the law of the land, and the negative obligation to refrain from acting so as to unjustifiably interfere with the rights of citizens. The SDS, generally and in relation to Celia Stubbs and the Blair Peach campaign, fundamentally failed in both respects. By engaging in decades of covert intelligence gathering it unjustifiably interfered with her right to peacefully pursue justice via the means of protest and the rule of law, and to do so without interference by the state. It also failed to pursue, or at least sought to frustrate, the positive obligation to act so as to enforce the law. It did so in that SDS knowledge and evidence was concealed from the processes of justice such as the Scarman Inquiry and the Blair Peach inquest. It also did so because intelligence was gathered with the purpose and motivation of responding to and resisting the just campaign pursued by Celia Stubbs in respect of her partner's death.
77. Covert surveillance of any peaceful campaign, whether it be a political campaign, a campaign for police accountability, or campaign for justice, is wholly unjustified. What is particularly stark and shocking in respect of the targeting of Celia Stubbs is that senior officers within the Metropolitan Police and officials within the Home Office knew full well that her campaign for justice was pursued not only as a matter of a civil right, but that the campaign was seeking to highlight and uncover a profound injustice, that is, that Blair Peach had been killed by a police officer yet the truth had been concealed. The conclusions of the Cass Report would have been known to senior officers within

⁷⁹ *Padfield v Minister of Agriculture, Fisheries and Food* [1968] AC 997, 1030B-D

the Metropolitan Police and the Home Office. They would have known, therefore, that there had been a conspiracy of silence between officers of the Special Patrol Group, with Commander Cass reporting that the explanations provided by a number of the officers had been “*seriously lacking*” and that the actions of three officers “*clearly obstructed the police officers carrying out their duty of investigating this serious matter.*”⁸⁰ They would have been aware of Commander Cass’s view that Inspector Murray had “*not given a credible account of his movements and it is disturbing*” and that “*grave suspicion*” attached to him “*if not as the officer responsible but for concealing it.*” They would have known that the Cass report was not produced at the inquest, and that the conclusion of ‘misadventure’ reached by the inquest was a travesty. The same high levels of authority would also have known of the SDS, and some must have known that the SDS was being used to gather intelligence on the Blair Peach campaign. Certainly at an institutional level, but probably also at a personal level amongst certain high ranking officers within Metropolitan Police, that dual knowledge of the Cass report and the injustice surrounding Blair Peach’s death, and the duplicitous attempts to frustrate the pursuit of justice by the Blair Peach campaign, was abhorrent.

Postscript

78. Celia Stubbs and her legal team would again like to thank the Chair for permitting access to the T1P3 hearing bundle to Dr Graham Smith, another core participant and a leading academic in police accountability, who has assisted in preparing this statement.

SAM JACOBS
Doughty Street Chambers
SIMON CREIGHTON
Bhatt Murphy

10th February 2023

⁸⁰ Commander Cass’s report of 14th September 1979, available at https://www.met.police.uk/SysSiteAssets/foi-media/metropolitan-police/other_information/corporate/blair-peach--14-september-1979-report-pseudonyms

ANNEX: TIMELINE
THE SDS REPORTING ON CELIA STUBBS AND THE BLAIR PEACH CAMPAIGN

| DATE | DOCUMENT | SOURCE | OPUS REF | INFORMATION DISCLOSED TO CELIA STUBBS ⁸¹ |
|-------------------|---|---------------------|--|---|
| 14-22.04.1979 | Seven reports on policing preparations for Southall demonstration | SB A8 SDS | MPS-0748288 MPS-0748289 MPS-0748293 MPS-0748299 MPS-0748332 MPS-0748342 UCPI0000021193 | UCPI: Dec 2022 : Mar 2021 |
| 23.04.1979 | Southall demonstration: Blair Peach killed by police officer(s) | | | |
| 23.04.1979 | UCO present: managers told not to go as uniformed police planning to “clamp down on demonstrations” | SDS | HN41 transcript MPS-0748063/6 | UCPI: Mar 2022 |
| | One UCO present: left before Blair Peach (BP) killed | SDS | UCPI0000034307/7 | UCPI: Mar 2021 |
| | SB report: refers to BP as having died “allegedly from injuries received during the demonstration” | SB | MPS-0748296 | UCPI: Dec 2022 |
| | Appendices to SB report on persons arrested | SB | MPS-0733404 | UCPI: Mar 2021 |
| | Sir Charles Pollard describes policing arrangements and calls it a “disaster” for A8 and MPS | A8 | MPS-0748347 | UCPI: Jan 2023 |

⁸¹ Some documents were disclosed to CS by the Inquiry very shortly before they were uploaded to OPUS, for example, the uploads in December 2022 and January 2023. The (approximate) OPUS upload date is used for ease of reference.

| | | | | |
|-------------------|---|----------------------------------|---|-----------------------------|
| 25.04.1979 | Prime Minister briefing with Home Secretary regarding press conference on BP killing and refusing a public inquiry | National Archives PREM16/2084 | N/A | Obtained by Dr Smith (2022) |
| 26.04.1979 | Blair Peach inquest opened and adjourned | | | |
| 12.05.1979 | A Department initial draft report into Southall demonstration and BP killing | MPS | MPS-07483441 | UCPI: Dec 2022 |
| Apr-Jun 1979 | Three UCO reports on meetings concerning BP killing | SDS | UCPI0000020990 UCPI0000021270 UCPI0000021207 | UCPI: Mar 2021 |
| 23.05.1979 | Blair Peach inquest further adjourned for Cass report to be completed | | | |
| 30.05.1979 | UCO report on leaflet printed by Friends of Blair Peach Committee (FBPC) on BP killing | SDS | UCPI0000021297 | UCPI: Mar 2021 |
| 04.06.1979 | UCO report on SWP circulating leaflet of FBPC on BP killing | SDS | UCPI0000021313 | UCPI: Mar 2021 |
| 22.06.1979 | UCO report on meeting calling for public inquiry into BP killing | SDS | UCPI0000020990 | UCPI: Mar 2021 |
| Unknown | UCO smuggled into New Scotland Yard to give statement about BP killing to murder squad | SDS | HN41 transcript MPS-0748063/7 | UCPI: Mar 2022 |
| 13.06.1979 | Funeral of Blair Peach | | | |
| 13.06.1979 | One UCO attended funeral Pictures taken of mourners and list of those attending prepared UCO tasked to report on FBPC (dated Oct 1979) Two UCO reports enclosing photos of people attending (dated Nov 1979) | SDS | UCPI0000034307/7 Closed gist in T1P2 UCPI0000013532 UCPI0000013547 UCPI0000013539 | UCPI: Mar & Oct 2021 |
| 19.06.1979 | SB report on people who have given statements for the BP inquest | SB | DOC076 | DPA: Jan 2022 |
| 22.06.1979 | UCO report on ANL meeting on BP killing | SDS | UCPI0000020990 | UCPI: Mar 2021 |

| | | | | |
|-----------------------|--|-----------|---|--|
| 12.07.1979 | Cass reported (first Report) – finding Blair Peach killed by police – shared with coroner but not Celia Stubbs | | | |
| 13.07.1979 | UCO report on people who attended funeral of BP | SDS | UCPI0000021047 | UCPI: Jan 2020 |
| 14.09.1979 | Second Cass Report | | | |
| 01.10 – 12.12.1979 | Five UCO reports on meetings and planned pickets prior to opening of BP inquest Four UCO reports on pickets held on the eve of BP inquest UCO report of newspaper report on vigil held on eve of BP inquest including photograph of a woman UCO report listing people who attended a picket on the eve of BP inquest (dated 12.12.1979) | SDS | UCPI0000013435 UCPI0000013453 UCPI0000013466 UCPI0000013468 UCPI0000020068 UCPI0000013497 UCPI0000013498 UCPI0000013500 UCPI0000013505 UCPI000001350 UCPI0000013653 | UCPI: Mar 2021 UCPI: Jan 2020 UCPI: Mar 2021 |
| 11.10.1979 | Blair Peach inquest opens – adjourned for legal challenge | | | |
| 04.02.1980 | Minute sheet on plans for BP memorial march | SB/MPS/HO | MPS-0733126 | UCPI: Dec 2022 |
| 27.02.1980 | UCO report on proposed picket on anniversary of BP killing | SDS | UCPI0000013888 | UCPI: Mar 2021 |
| 18.04.1980 | UCO reports on pickets prior to reconvened BP inquest | SDS | UCPI0000020094 UCPI0000013888 | UCPI: Mar 2021 |
| 25.04.1980 | Memorandum discussing potential injunction against FBPC for criminal libel | MPS | MPS-0733406 | UCPI: Jan 2020 |
| 28.04.1980 | Blair Peach inquest reconvenes and concludes on 27.05.1980: misadventure verdict | | | |

| | | | | |
|-------------------|---|-----|--|----------------|
| 28.07.1980 | UCO report on FBPC trying to make links with other deaths in custody (precursor of INQUEST charity) | SDS | UCPI0000014149 | UCPI: Mar 2021 |
| 03.02.1981 | UCO report on conference describes Sir Stephen Sedley as BP family's barrister | SDS | UCPI0000016366 | UCPI: Mar 2021 |
| 19.02.1981 | SB report (SDS?) on meeting to discuss statements to be given to police | SB | DOC077 | DPA: Jan 2022 |
| Feb 1981 | UCO reports on plans for BP memorial march | SDS | UCPI0000016434 MPS-073184 | UCPI: Mar 2021 |
| 14.12.1981 | UCO report on campaign for police accountability | SDS | UCPI0000016831 | UCPI: Mar 2021 |
| June 1981 | INQUEST founded | | | |
| 01.02.1982 | UCO report on INQUEST meeting | SDS | DOC079 | DPA: Jan 2022 |
| 20.01.1983 | SB report on police accountability groups, GLC and extremism – Celia Stubbs and INQUEST named | SB | MPS-0748355 | UCPI: Jan 2023 |
| 1983 (?) | SB profile of Celia Stubbs and work with INQUEST (derogatory) | SB | DOC078 | DPA: Jan 2022 |
| 1983 | SB minute sheet on Celia Stubbs and INQUEST | SB | DOC080 | DPA: Jan 2022 |
| 1995-1996 | Four UCO reports (Mark Jenner: cover name Mark Cassidy) on Colin Roach Centre and Hackney Community Defence Association | SDS | MPS-0245625 MPS-024385 MPS-024612 MPS-0001219 | UCPI: Jan 2020 |
| 28.07.1998 | UCO report by Mark Jenner on BP 20 th anniversary march – "Touchy Subject" | SDS | MPS-0001219 | UCPI: Jan 2020 |
| 21.01.1999 | SB report on Lawrence Inquiry and plans for BP 20 th anniversary march | SB | MPS-0001707 | UCPI: Jan 2020 |
| 24.04.1999 | 20th Anniversary of Blair Peach killing march | | | |
| 27.04.2010 | Cass Report released to public by MPS | | | |