

IN THE MATTER OF THE UNDERCOVER POLICING INQUIRY

T2P1 OPENING STATEMENT ON BEHALF OF JANE HICKMAN, HILARY MOORE & REBECCA JOHNSON

I – INTRODUCTION

1. Core Participants to the Undercover Policing Inquiry, Jane Hickman, Hilary Moore and Rebecca Johnson, have common threads to their actions which have led to designation with that status. Each was born in the early 1950s; each, in their own way, was committed to the cause of peace and disarmament and each campaigned publicly, peacefully, lawfully and openly against the deployment of nuclear weapons in the United Kingdom. Each has been the object of wholly unjustified, intrusive, political monitoring and surveillance, apparently instigated at the insistence of Margaret Thatcher, then Prime Minister of the United Kingdom, apparently for the political purpose of seeking to obtain material which could be deployed in the press, in an effort to discredit the women and their cause.
2. Inquiry witness HN33, who went by the code name of Lee Bonser, is central to this aspect of the Inquiry's work. She had been in the police since the mid 1970s and was assigned to Special Branch in the early 1980s. She recalls how in 1983 she was singled out by a superintendent and was expressly told that the Prime Minister wanted to know what the "Greenham Women" were doing, and asked whether she would be prepared to help the police find out.¹ She agreed and was placed with the Special Demonstration Squad ('SDS'). According to her statement, her training was almost non-existent.² She was given no advice about intimacy or sexual relationships with people who were objects of her surveillance, about not encouraging criminal activities, about legal professional privilege ('LPP'), and other important issues pertaining to state sanctioned surveillance.³ She was left to her own judgment as to how far she could become involved in the personal lives of those she was monitoring. Her tasking to infiltrate Greenham Common women was so generalised that she was actually permitted to select herself the group and individuals she chose to intimately survey. She says, "*I think it was a result of me finding an advert and attending a meeting of Lambeth Women for Peace group that led to my involvement*".⁴
3. So, according to HN33, it was the random "*finding*" of an advert that led to the numerous reports, intrusions into private lives, and "Stasi"-like surveillance documents on these three Core Participants, which the Inquiry now has in its possession, and not any pre-existing suspicions or legitimate concerns held by the Metropolitan Police Service

¹ [MPS-0745970/3]

² [MPS-0745970/4]

³ [MPS-0745970/5]

⁴ [MPS-0745970/13]

(‘MPS’) or other police officers. A key question is why she did not simply go to Greenham and join the peace camp, as so many other women were doing.

4. We invite the Inquiry to fully investigate whether HN33’s suggested scenario can be true. Jane Hickman notes her Special Branch file dates from 1977. Hilary Moore’s file goes back to 1975 and Rebecca Johnson’s file dates from 1983, although no SDS reports prior to April 1984 have been disclosed to her.
5. By way of introduction to the three Core Participants that we represent, and the campaigns that they supported:
 - a. Hilary Moore was a teacher. She qualified in 1974. She worked for three years in Jamaica on a VSO primary school literacy programme, returning to the UK in the late 1970s. She worked with disadvantaged children and young people with special educational needs in three south London special schools. In 1988 this work developed to a special link course programme at South Thames Further Education College. In 1991 she moved to Bristol where she did similar work at City of Bristol College until retirement some 11 years ago. After visiting Greenham Common Peace Camp at the end of 1982, she co-founded, with Mandy Drummond, the group that became Lambeth Women for Peace (‘LWP’). This group was, like most feminist groups at that time, non-hierarchical, having no formal constitution or positions. All interested women were welcomed to join and contribute to the weekly meetings. The foundation of the group was to support the women at the Greenham Women’s Peace Camp and to educate and spread the message of the camp into the local community. The core principles of the group were nonviolent and internationalist. As the group developed it supported many other campaigns, such as the Anti-Apartheid Movement, the occupation of South London Women’s Hospital, and latterly had a strong fundraising and campaigning link with a school in Tigray, Ethiopia. Attendance varied over the years but averaged eight to ten at any meeting.
 - b. Rebecca Johnson was a graduate of Bristol University in 1977, taught overseas in Tokyo between 1979 and 1981, graduating with a Masters from SOAS in 1982 with a thesis on “US-Soviet rivalry over the reconstruction of Japan from 1945-1951”. She postponed her PHD to become involved in the Greenham Women’s Peace Camp in 1982, when the camp was a small and active protest of 15 to 20 women committed to nonviolent disarmament and peace; together with a few children they resided in a handful of caravans and tents parked near the main gate of the USAF-RAF air base Greenham Common, near Newbury, Berkshire. She stayed at Greenham for five years and continued to be active in Cruisewatch, the Aldermaston Women’s Peace Camp, the Campaign for Nuclear Disarmament (‘CND’) and Greenpeace after that. As a result, she appears in some of the police reports generated by HN33 as well as those of HN88 “Timothy Spence” and HN65 “John Kerry” in relation to her involvement with CND. In her witness statement she disputes the accuracy of many of these. Since 1994, she has spent her life engaged in diplomacy in different capacities on the international stage to

seek secure nuclear disarmament, contributing to adoption and implementation of the Intermediate-Range Nuclear Forces ('INF') Treaty from 1987 onwards, the 1996 Comprehensive Test Ban Treaty ('CTBT') and the 2017 Treaty on the Prohibition of Nuclear Weapons ('TPNW'), sharing in the Nobel Peace Prize awarded to the International Campaign to Abolish Nuclear Weapons ('ICAN') in 2017.⁵ She is willing to give evidence before the Inquiry but has not been called to give evidence in the Tranche 2 ('T2') Phase 1 hearings.

- c. Jane Hickman was a young solicitor. She worked as an employee and then partner at Fisher Meredith in Stockwell. She was to become the highly successful founder and senior partner of the city law firm Hickman & Rose. At the time of the intrusive surveillance by the SDS, she was in her early thirties. Her work as a solicitor included criminal defence. She came to the Greenham cause through her role in representing clients arrested at the base including Rebecca Johnson. Her role in LWP was as an ordinary participant and supporter, resulting from her own beliefs and the fact of residence in the area. She participated in a temporary peace camp on Clapham Common. Her energy as a young lawyer can be seen in her work with Greenham Women against Cruise Missiles ('GWACM'). This was a group of activists who wanted to test the lawfulness of locating and deploying cruise missiles in a densely populated area. Ms Hickman assisted them in seeking an injunction in the US Federal Court in New York to prevent the export of cruise missiles to the UK. The work of GWACM and Ms Hickman's involvement in it is illustrated by the three-part TV documentary "*The Greenham Challenge: Bringing Missiles to Trial*".⁶ She raises the important disclosures made by Cathy Massiter, an MI5 employee in 1984, which appeared to indicate Michael Heseltine was being fed information from the SDS for use in discrediting CND and the peace movement when he became Secretary of State for Defence in 1983.⁷
6. HN33 infiltrated LWP in June 1983, and continued to be a very regular participant until late 1986. She took on key roles in the group, joined discussions and activities, frequently took minutes, on occasions represented LWP at other meetings, visited Greenham Common with women from the group, and often provided transport. HN33's statement indicates of LWP that "*their activities were always peaceful*".⁸ She says she "*had some sympathy for their cause*".⁹ Yet senior officers in the SDS chose to continue her deployment with LWP for a period of almost four years.
7. HN33 has provided a detailed statement. However, unlike the Core Participants that we represent, she has declined to give evidence before the Inquiry. These Core Participants are dismayed that HN33, a former public servant, will not attend to account for her

⁵ [UCPI0000036777/59-60]

⁶ "The Greenham Challenge: Bringing Missiles to Trial", available at: <https://www.youtube.com/watch?v=LY4yeFJJPYw>; <https://www.youtube.com/watch?v=4vEnQD3tnI4>; <https://www.youtube.com/watch?v=LPjaJqhKPCa>

⁷ [UCPI0000036662/67]

⁸ [MPS-0745970/16]

⁹ Ibid

actions and those of her former employer. We invite the Inquiry to draw inferences from her reluctance to be questioned, where appropriate.¹⁰

8. In the more detailed submissions that follow in paragraph 71 below we invite the Inquiry to investigate fully why Greenham women were targeted. Was this, as these Core Participants suspect, the result of political intervention by the Prime Minister? Was the material gained by the SDS shared with Ministers and, in particular, with Michael Heseltine when Minister of Defence? If not, then what policing climate could have led to tasking which was so vague and to supervision that was so lax that HN33 was allowed to choose her own group to infiltrate, to remain for so long as a state-paid employee despite its accepted peaceful actions, with housing, a car and paid overtime all at taxpayers' expense?
9. These, amongst others, are some of the questions we raise, which are of fundamental importance to the clients that we represent. It is a desire to get to the truth that motivates their participation in the Inquiry.
10. Hilary Moore, Rebecca Johnson and Jane Hickman have found the difficult timelines and Inquiry processes very stressful, exacerbated by undue and unmanageable pressures to complete R9 statements while still reviewing documents and revisiting memories from decades ago, at the same time as anticipating further disclosures, which in some cases have not been received.
11. In solidarity with many other Core Participants suffering similar pressures, Hilary Moore, Rebecca Johnson and Jane Hickman endorse calls to ensure that the ability of participants to access, review and provide evidence must not be compromised by the pressures of the Inquiry's suddenly truncated timeline and rush to finish by 2026. Changes to Inquiry plans for disclosure, restricting the evidence to be disclosed concerning key political entities, are deeply unfair on participants in later tranches, and a disservice to all involved. The Inquiry must respect the contributions of all participants equally if there is to be any hope of providing a fair and effective investigation. Core participants must not be side-lined and siloed due to increased time pressures imposed on Inquiry staff. The inquiry should engage with participants to find acceptable solutions to the efficient allocation of time and resources to ensure all participants are treated fairly and the aims of the Inquiry are not compromised.

II – THE GREENHAM WOMEN

“As with many political grassroots movements it is in retrospect that we can see what catalysts for change they were – the suffragettes in gaining votes for women, the anti-apartheid movement in providing pressure for positive change in South Africa and the women’s peace movement for contributing to the de-escalation of nuclear weaponry.”¹¹ – Hilary Moore

¹⁰ We also endorse submissions made by the Co-Ordinating Group of Non-Police Non-State Core Participants on this point.

¹¹ [UCPI0000036948/93]

12. In the T2 period (1983 to 1992), the threat of nuclear war loomed large. People in Britain became more aware of the catastrophic impact that a nuclear attack would have. As set out in Rebecca Johnson's evidence:

*"The humanitarian impacts of any use of nuclear weapons of mass destruction would be catastrophic in terms of people killed, lives destroyed, and devastating levels of long-lasting environmental contamination."*¹²

13. Many people were understandably terrified by this prospect, and political opposition to the prospect of cruise missiles, a new class of ground-launched INF, being based in the UK grew.¹³

14. At the same time, as Hilary Moore explains, there was a growing desire amongst women in many areas of civil society to assert their political agency in distinct ways:

*"Women were starting to find a stronger political voice. It felt like the established peace movement did not take account of women's experiences and ideas... There was a lot of positive energy that women could change the world and campaign for peace in a more creative and imaginative way."*¹⁴

15. A group of predominantly Welsh women formed "Women for Life on Earth" and walked with their children from Cardiff to Greenham Common, where they arrived on 5th September 1981. Once there, some decided to stay and set up a 'peace camp' in order to demonstrate their determined opposition to the Government's decision to deploy US cruise missiles at the Greenham Common air base from 1983.¹⁵

16. From its start, the peace camp's public profile grew rapidly and gained widespread support, drawing in women from a range of backgrounds. In December 1982, the "Embrace the Base" protest attracted 35,000 women,¹⁶ sufficient to join hands around the whole nine-mile perimeter of the base. Around 6,000 women stayed overnight to "Close the Base". Such protests, which included the 1983 New Year's Day dawn protest in which 44 women occupied a nuclear silo that was under construction inside the base, gained worldwide coverage. The photograph, published in "The Greenham Factor", is at Appendix A of these submissions.¹⁷

17. The success of the camp led to the establishment of many other women's peace groups. As Rebecca Johnson explains:

"Many women were inspired by Embrace, Close the Base in 1982, and started meeting together as 'Greenham Women' in their own local areas. This, at its heart, was the

¹² [UCPI0000036777/8]

¹³ In a briefing to Prime Minister Margaret Thatcher, Defence Secretary John Nott, acknowledged the particular public concern over the basing of US Cruise Missiles in the UK, and noted the particular public opposition to the basing of missiles at Greenham Common [UCPI0000036801].

¹⁴ [UCPI0000036948/12]

¹⁵ [UCPI0000036662/20]

¹⁶ [UCPI0000036777/20]

¹⁷ At page 27 of these submissions.

*meaning of 'Carry Greenham Home... the term 'Greenham support groups' was a bit of a misnomer – these groups were autonomous and self-organised.'*¹⁸

18. Proclaiming that “*Greenham Women are Everywhere*”, these groups organised events locally and visited Greenham peace camp where possible. LWP, like many others, initiated activities and also responded to information from Greenham, such as the call to set up peace camps in their own localities for Women’s International Day for Disarmament and GWACM in 1983. A leaflet created by LWP to publicise the Clapham Common Peace Camp, along with planning documents and photographs of the event, are provided with this statement at Appendices C to E.
19. The aims of the Greenham Camp and networks of Greenham groups evolved after the first cruise missiles were delivered to Greenham at the end of 1983. Among the many who identified with Greenham were women with backgrounds and connections to peace, environmental and feminist groups, as well as faith-based and political organisations, Anti-Apartheid, trades unions, and parliamentarians.¹⁹ As Greenham became more internationally relevant, women visited from many different countries to give solidarity and share their own campaigns to end nuclear testing and deployments in their own regions. These visits inspired more Greenham women to become involved with Women Working for a Nuclear Free and Independent Pacific (‘WWNFIP’) and campaign with indigenous people living on Pacific islands and lands in various countries that tested and deployed nuclear weapons.²⁰
20. In 1984 Cruisewatch and the Aldermaston Women’s Peace Camp were established to involve more activists in opposing cruise missile deployment exercises and Trident renewal. In opposing all aspects of the Cold War and British, NATO and Soviet nuclear weapons production, testing and transporting of nuclear weapons, Greenham women became more outspoken in talking about the legacies of colonialism and racism, and the military, industrial, bureaucratic and political systems that were driving nuclear proliferation and environmental destruction.²¹ It became increasingly important for Greenham to join campaigns to oppose apartheid and support indigenous peoples to become nuclear free and independent, and to link Greenham peace activities with issues such as nuclear power, uranium mining and racism in South Africa, Namibia and Australia, along with campaigning to stop nuclear transports and end nuclear testing and production programmes.²²
21. There were no leaders or formal positions of responsibility within the Peace Camp.²³ As more women arrived, up to ten camps were set up around the base, named after colours of the rainbow. Any woman was welcome to be at Greenham, to live or to support and join in for as long as they wished. To be Greenham Women meant committing to using

¹⁸ [UCPI0000036777/51]

¹⁹ Ibid, p.51

²⁰ Ibid, p.52

²¹ Ibid, pp.54-55

²² Ibid, also see Exhibit REJ14 on Greenham Links initiatives organised by Greenham camp, Women Against Pit Closures, and local groups from Manchester, Durham, Sheffield, Wales and London [UCPI0000036819].

²³ [UCPI0000036948/16]

nonviolent actions for disarmament, peace and justice, and taking personal and political responsibility for your actions as a participant.²⁴

22. The aims of the Greenham women were many-stranded, but they held a generally agreed near-term objective of changing government policy so that no cruise missiles or other INF would be situated or deployed in the UK.²⁵ They also aimed to “*highlight the unimaginable catastrophe that nuclear weapons presented, and that nuclear disarmament was both possible and sensible, without the use of any violence*”.²⁶
23. The Greenham women were avowedly nonviolent; there was an “*absolute consensus on eschewing the use of violence against the person or serious violence towards property*”.²⁷ Generally approved methods to achieve campaign aims included increasing democratic engagement; persuading the public to persuade politicians to remove all nuclear weapons and changing laws and policies to build sustainable security and peace in Britain and beyond.²⁸
24. The camp at Greenham and the movement supporting it also aimed to assert the “*ability and freedom of women to participate in politics on their own terms*”.²⁹ Further:

“*Greenham succeeded in making a fundamental shift in the way that many women saw themselves. A large number of women were introduced to the experience of exercising political agency and demanding that their viewpoints as women and mothers be given proper political weight.*”³⁰
25. Many of the Greenham women, including those living at the camp and those in support groups, had responsible, socially committed, full time jobs. Many, like the Core Participants to this Inquiry that we represent, went on after their time at Greenham to pursue careers in influential roles as teachers, lecturers, eminent lawyers and senior members of the judiciary, experts on nuclear disarmament, and as senior civil servants and politicians.³¹
26. As support for the Greenham women built, smaller groups, such as LWP formed in order to support the camp and work for peace and justice in their own communities. LWP, like the women at Greenham Common, had a belief in nonviolent protest as the most effective way to get the group’s message across. Members shared a general abhorrence of war, nuclear weapons and violence.³²
27. The Greenham Women’s Peace Camp is widely recognised as a movement of historic importance.

²⁴ [UCPI0000036777/20-22]

²⁵ [UCPI0000036662/27]

²⁶ [UCPI0000036948/11]

²⁷ [UCPI0000036662/27]

²⁸ [UCPI0000036662/27]; [UCPI0000036777/15-16]

²⁹ [UCPI0000036662/27]

³⁰ [UCPI0000036662/28]

³¹ [UCPI0000036662/29]

³² [UCPI0000036948/12-13]

28. Their opinions were not extremist; the women’s peace movement position on nuclear weapons broadly reflected the norms of international law. Their preferred outcome was recognised and adopted by both the US and the UK within a very few years with the signing of the INF Treaty in 1987.³³ As a result, the last missiles left the base at Greenham in 1991. The Greenham Women were on the right side of history.
29. GWACM, a group of Greenham Women formed to bring legal action against the US government to prevent cruise missiles from being brought to the UK, was a legal and political first. Although the case was ultimately unsuccessful, it drew huge attention around the world to the threat posed by nuclear weapons and the wealth of information compiled led indirectly to changes in British policies and international laws relating to nuclear weapons, including the CTBT, the 1996 ICJ Opinion on the Threat or Use of Nuclear Weapons³⁴ and the 2017 Treaty on the Prohibition of Nuclear Weapons which entered into international legal force in 2021.³⁵
30. As set out in the introduction, Jane Hickman, Rebecca Johnson and Hilary Moore were involved in different capacities with the Greenham Common Women’s Peace Camp and its associated groups in the T2 period. They share, then and now, a commitment to making the world a better, safer and more peaceful place, and to feminist principles of political organising.
31. Although they played very distinct roles in the movement of which they were a part, they also share the troubling experience, common to other Core Participants to this Inquiry, of discovering that they have been subject to surveillance by undercover police spies for no better reason than their involvement with political campaigns that were unpopular with government and police at the time.

III – UNDERCOVER SURVEILLANCE OF THE GREENHAM WOMEN

*“The police made a terrible mistake in using what is supposed to be a last resort against citizens in this country, of employing undercover surveillance to note the thoughts, speech and assembly of women protesting against these weapons, and in the case of HN33 letting that go on for at least the 41 months from June 1983 to November 1986”.*³⁶ – Jane Hickman

32. In around 2021 it was brought to the attention of the three Core Participants that we represent that an undercover officer, HN33, had been specifically tasked to report on Greenham Women’s peace groups. She claimed to be a woman who had left an abusive partner when she joined LWP. This was an open group where any woman could turn up and attend meetings.
33. Although members of LWP had some reservations about “Lee’s” lack of political awareness, they felt somewhat sorry for her because she cut an isolated figure, seemingly

³³ [UCPI0000036777/59-60]

³⁴ *Advisory Opinion on the Legality of the Threat or Use of Nuclear Weapons* (Advisory Opinion) ICJ GL No 95, [1996] ICJ Rep 226

³⁵ [UCPI0000036662/40]

³⁶ [UCPI0000036662/58-59]

lacking a social network.³⁷ She was welcomed in and quickly became a regular attendee at meetings, abusing the trust, friendship and kindness of LWP members to enter private homes, to invade the private lives of peace activists and to collect private and personal information.

34. The question Jane Hickman, Hilary Moore and Rebecca Johnson have had from the outset is, why? Why were the Greenham Women seen as appropriate targets for surveillance in the first place? How could MPS Special Branch consider it an appropriate or cost-effective use of police resources to send an undercover officer into a small group of women peace activists in South London?
35. LWP's numbers rarely, if ever, went beyond 12. Meetings tended to average around eight women. They were a "*fairly reasonable mild-mannered lot, certainly not trying to pick fights*". LWP events were "*orderly in the extreme*".³⁸ Before "Lee Bonser" joined the group, the women had organised an all-day community-based event at a church in Brixton on 19th March 1983³⁹ and the peace camp on Clapham Common from 21st to 24th May 1983 to celebrate Women's International Day for Disarmament.⁴⁰ Councillors and local MPs, including Harriet Harman, visited and supported the camp.⁴¹ Events included stalls, child-friendly activities, speeches and music. Photos of the event, enclosed at Appendix E, show that it was well organised, informative, peaceful and fun.
36. Only a month after the peace camp, on 22nd June 1983,⁴² "Lee Bonser" joined the group. There is no reason that the events which preceded her deployment should have triggered the interest of Special Branch. On the basis of the organisation's activities prior to "Lee's" arrival, there was simply no reason to consider LWP a suitable target for surveillance on the basis of public order issues, subversion, serious crime or threats to national security.
37. HN33's statement confirms that "*their activities were always peaceful*". She concedes that she "*had some sympathy for their cause*".⁴³ Yet senior officers in the SDS chose to continue her deployment with LWP for a period of almost four years.
38. In this time, HN33 befriended members of the group,⁴⁴ entering into their personal and political lives. This included:
 - a. Fronting an LWP stall at the Lambeth Country Show and telling members of the public about the group.⁴⁵

³⁷ [UCPI0000036948/66]

³⁸ Ibid, pp.36-39

³⁹ Ibid, pp.18-19; see also the "Women for Peace Day of Action" leaflet exhibited to Hilary Moore's statement and referred to at paragraph 75.

⁴⁰ Ibid, pp.23-24

⁴¹ Ibid, p.36

⁴² Ibid, p.63

⁴³ [MPS-0745970/16]

⁴⁴ Ibid, p.66; [MPS-0745970/25]

⁴⁵ [UCPI0000036948/64]

- b. Regularly attending, and, on at least one occasion, facilitating⁴⁶ LWP meetings including those which took place in private homes.⁴⁷
 - c. Attending demonstrations and giving lifts to members in her car.⁴⁸
 - d. Sharing a tent with an LWP member at Greenham Common.⁴⁹
 - e. Socialising with other members of the group, buying drinks in the pub,⁵⁰ taking part in nights out and parties at members' homes.⁵¹
 - f. Representing LWP at meetings of other groups and forums.⁵²
 - g. Serving as one of seven authorised signatories for the Greenham Women's Peace Camp bank account.⁵³
39. "Lee" had infiltrated the group to such an extent that when she informed LWP members that she was moving to Australia as cover for her redeployment in 1986 the group threw a goodbye party for her and gave her a piece of silver jewellery as a farewell gift.⁵⁴
40. Yet, unbeknownst to the women who had befriended her, through "Lee" a shadowy unit with the MPS was closely monitoring, recording and, at times, influencing the activities of the group. By the end of HN33's deployment, approximately nine of LWP's members had been given Record File numbers.⁵⁵ Seven were given numbers in 1984 and 1985, seemingly for no other reason than their involvement with LWP.
41. Through "Lee", the SDS collected extensive and detailed intelligence about individual LWP women and the political activities of various groups of which they were members. This included reporting on:
- a. Meetings, political discussions, and campaign plans.⁵⁶
 - b. Activists' home addresses and personal phone numbers,⁵⁷ details of who they were living with,⁵⁸ car registration details,⁵⁹ educational⁶⁰ and employment information.⁶¹

⁴⁶ [UCPI0000020327]; [MPS-0745970/17]

⁴⁷ [UCPI0000036948/67]

⁴⁸ Ibid, p.65

⁴⁹ [UCPI0000036948/82]

⁵⁰ Ibid, p.65

⁵¹ Ibid, pp.65, 67

⁵² Ibid, p.89; [UCPI0000036946]

⁵³ [UCPI0000020237]

⁵⁴ [UCPI0000036948/68]

⁵⁵ [UCPI0000014444]; [UCPI0000022526]; [UCPI0000022545]

⁵⁶ UCPI0000019338]; [UCPI0000019362]; [UCPI0000019381]

⁵⁷ [UCPI0000019374]; [UCPI0000019612]; [UCPI0000020542]; [UCPI0000020807]; [UCPI0000014912]

⁵⁸ [UCPI0000019544]; [UCPI0000019675]

⁵⁹ [UCPI0000014763]

⁶⁰ [UCPI0000020316]; [UCPI0000020323]; [UCPI0000022540]

⁶¹ [UCPI0000024531]; [UCPI0000022525]; [UCPI0000022540]

- c. The addresses of a London “rest house” for the Greenham women (referred to in reports as a “safe house”).⁶²
 - d. Activists’ relationships and sexualities.⁶³
 - e. Bank details and other financial information relating to the Peace Camp at Greenham, GWACM and associated groups.⁶⁴
 - f. Legal advice given to activists and meetings regarding the court case pursued by GWACM, and other discussions and advice subject to legal professional privilege.⁶⁵
 - g. Press interest in LWP.⁶⁶
 - h. Engagement with local democratic bodies such as the Greater London Council (‘GCL’), the Women’s Committee of the GLC and Islington Council.⁶⁷ The Committee was then chaired by Councillor Valerie Wise, who features in reports and received an RF number.⁶⁸
 - i. Support provided to LWP by well-known actress, Julie Christie, who was also designated with an RF number.⁶⁹
42. Events and discussions reported that were subject to reporting included the use of the GLC “Peace Bus” by LWP,⁷⁰ silent vigils,⁷¹ a demonstration at Islington Green to “*protest against the harassment of lesbians in the area*”⁷² and plans to support a women’s school in Tigre, Ethiopia.⁷³
43. This information was not only retained but included in reports by senior officers and passed on to clients including the Security Service and, on at least one occasion, the American Government.⁷⁴
44. A particularly concerning aspect of HN33’s deployment was her willingness to report on discussions subject to legal professional privilege, and the court case mounted by GWACM against then President of the United States, Ronald Reagan. For example, one report details the basis for the proceedings brought against President Reagan, legal treaties and laws proposed to be relied upon and the number of plaintiffs, as well as fundraising plans for court costs.⁷⁵ The report also identifies Jane Hickman in her legal

⁶² [UCPI0000019401]; [UCPI0000019686]

⁶³ [UCPI0000022598]

⁶⁴ [UCPI0000019646]; [UCPI0000019536]; [UCPI0000019541]

⁶⁵ [UCPI0000022546]; [UCPI0000014796]; [UCPI0000014796]

⁶⁶ [UCPI0000019240]; [UCPI0000019683]

⁶⁷ [UCPI0000020549]

⁶⁸ [UCPI0000019337]; [UCPI0000019338]

⁶⁹ [UCPI0000020549]

⁷⁰ [UCPI0000019338]

⁷¹ [UCPI0000019435]; [UCPI0000020445]

⁷² [UCPI0000020960]

⁷³ [UCPI0000014444]

⁷⁴ [MPS-0733854]

⁷⁵ [UCPI0000019613]

role, and records her place of work as a solicitor.⁷⁶ A later report describes her as one of the solicitors acting for the women at Greenham Common Women's Peace Camp and records her car make and model and registration number.⁷⁷ Another records her plans to travel to a hearing.⁷⁸ HN33 states in her evidence that she was not provided with any advice or guidance by SDS managers in relation to legal professional privilege, and no one raised any issues with her in respect of this reporting.⁷⁹

45. In T1, the Inquiry's Interim Report identified the "*striking feature*" of the reporting of the SDS that it contained "*extensive details about individuals – their political views, personality, working life, relationships with others, and family and private life.*"⁸⁰ Further, the Inquiry found that such intrusion into the private and political lives of activists "*required cogent justification before it should have been contemplated as a police tactic.*"⁸¹
46. Evidence disclosed so far suggests that at no point was there an assessment or consideration of the justification for, or proportionality of, the infiltration of LWP or of the Greenham women more generally. HN33 maintains she was not privy to any discussions as to the justification or proportionality of her continued infiltration of the group.⁸² Had these issues been considered, the only possible conclusion could have been that targeting such a group was not justified or proportionate.
47. Women targeted by HN33 were peaceful activists exercising their democratic and civil rights to protest against government policy. As the available intelligence reports show, protests were generally peaceful, thoughtfully planned, often publicised, and, for LWP, on many occasions involved the support and/or cooperation of local authorities.⁸³ For example, see the draft letter to Lambeth Council and proposed timetable for the Clapham Common Women's Peace Camp enclosed at Appendix D to these submissions. As LWP developed the focus expanded from Greenham and the group also got involved with supporting more international issues such as the Anti-Apartheid Movement, and local issues like the closure of the South London Women's Hospital. By 1985 LWP was spending half of its meetings focused on supporting the women's school in Tigray, Ethiopia.⁸⁴ These meetings, under the LWP umbrella, were also attended by HN33.
48. Jane Hickman, Rebecca Johnson and Hilary Moore are not, of course, under any obligation to explain why they should not have been the subject of SDS surveillance; it is

⁷⁶ Ibid.

⁷⁷ [UCPI0000014763]

⁷⁸ [UCPI0000014442]

⁷⁹ [MPS-0745970/27-28]

⁸⁰ Undercover Policing Inquiry Tranche 1 Interim Report, June 2023, p.91

⁸¹ Ibid.

⁸² [MPS-0745970/16]

⁸³ [UCPI0000036948/89]

⁸⁴ The aim of the school was to enable women who were taking part in the civil war to reintegrate successfully into civil society. Some of the members of LWP visited the school in the mid 1980s and LWP began to locally fundraise to offer practical support to the project which was working to demilitarise the former women fighters. This support helped to buy equipment for the school, and also for a hospital. Hilary Moore addresses LWP support for the school in her evidence [UCPI0000036948/13]

for the state to justify why it engaged in such significant and covert intrusions into the private lives and activities of women involved in the peace movement. It is for the Inquiry to forensically test the justifications being put forward.

49. However, on the evidence disclosed to the Inquiry to date, we submit that the only safe conclusion on this issue is that the “intelligence” gathered in relation to the Greenham Women by HN33 and other officers made no contribution to proper policing purposes, and certainly none sufficient to justify the means employed:
- a. Greenham aims and methods did not pose a risk to national security or public safety. There was no evidence for serious organised crime.
 - b. They were not subversive. This is accepted by HN33.⁸⁵ She did not in fact witness *any* subversive activity during her entire SDS deployment.⁸⁶ Greenham Women aimed to effect change through the democratic political process.⁸⁷
 - c. Intelligence obtained by HN33 relating to planned protests or the activities of the groups was generally either redundant⁸⁸ or could have easily been obtained by less intrusive means.⁸⁹ In order to maximise attendance, Greenham Women and LWP tended to make plans for demonstrations widely known. Much of the information obtained by HN33 was already in the public domain.⁹⁰ Anything not in the public domain remained very small scale. HN33, for example, reported several instances of planned protests at Clapham Common South. Numbers are not known to have exceeded three or four women.⁹¹
 - d. It is highly unlikely that SDS intelligence obtained through LWP would have contributed to the successful policing of public order events at Greenham. LWP were rarely privy to sensitive discussions relating to plans at the camp, by virtue of their location in London and infrequent visits to the camp. LWP’s main focus was engaging on peace and justice issues relating to their communities in South London. Jane Hickman notes in her evidence that better intelligence on Greenham would have been obtained “*by sending a couple of women to the main gate with a tin of flapjacks*”.⁹²

⁸⁵ [MPS-0745970/16, 18]

⁸⁶ [MPS-0745970/25]

⁸⁷ [UCPI0000036662/27]

⁸⁸ For example, by the time of a report dated 3rd October 1983 about the planned case against President Reagan [UCPI0000019613], the group was already doing its utmost to reach as many women as possible across the country [UCPI0000036662/71-72]. As Jane Hickman further explains, almost precisely the same information had been published in the Guardian on 19th September 1983.

⁸⁹ Attachments sent as evidence with reports, such as leaflets, were often mass produced and widely circulated at Greenham, Lambeth or around the UK, were not secret and were very readily available. The ‘intelligence’ the SDS obtained through surveillance was, by and large, readily available without this level of intrusion.

⁹⁰ [UCPI0000019721]; [UCPI0000020445]

⁹¹ [UCP0000036662/61]

⁹² [UCPI0000036662/62]

- e. Protests at Greenham were heavily and brutally policed by the local police force, Thames Valley Police,⁹³ as well as other forces supplying additional officers, Ministry of Defence Police, and American and British soldiers responsible for securing the airbase itself.⁹⁴ In addition, the MPS were often involved in the larger CND and Greenham demonstrations, and in some nuclear exercises after 1984, such as taking cruise missiles out of the Greenham base on to public roads.⁹⁵ Police and military forces took an increasingly heavy-handed approach to demonstrators from 1982 onwards,⁹⁶ as did the bailiffs acting on behalf of Newbury District Council during the numerous evictions of camp residents.⁹⁷ For example, a photograph of Rebecca Johnson at Appendix B to these submissions shows that she was arrested and dragged away from the site by police following a demonstration on 5th October 1982. She was charged at Newbury Police Station with “breach of the peace” after being kept for hours in a police van on the base. This charge was dropped when the case went to court in November 1982.⁹⁸
- f. HN33 was unable to explain any impact whatsoever that her reporting had on the policing of these events.⁹⁹ On the evidence, the Core Participants we represent, Rebecca Johnson in particular, would strongly reject any suggestion that demonstrations were successfully policed because of SDS intelligence.
- g. The disclosed intelligence reports are littered with inaccuracies, including basic factual details such as the nature of events and discussions which took place,¹⁰⁰ and attendees,¹⁰¹ wider observations in relation to the structure and leadership of the groups under surveillance,¹⁰² and the prominence of HN33’s role,¹⁰³ rendering them an unreliable source for operational policing decisions. HN33 herself accepts that some reports are inaccurate or exaggerated.¹⁰⁴

50. HN33 concedes in her statement: “*I do not think my reporting contributed much to policing*”.¹⁰⁵ On this, those subject to her surveillance would respectfully agree.

⁹³ [UCPI0000036777/137]; Rebecca Johnson also exhibits a letter from Greenham Women to the Chief Constable of Thames Valley Police dated 12.4.84, in which concerns were raised about the ‘policing of Greenham since the eviction’, and noted also that questions were asked in the House of Commons about ‘the behaviour of the police at the time of the eviction’ [UCPI0000036806].

⁹⁴ [UCPI0000036777/41,130]

⁹⁵ See, for example, reports associated with HN88 and HN65

⁹⁶ [UCPI0000036948/26]

⁹⁷ [UCPI0000036777/29, 135 – 141]; see also Rebecca Johnson’s Exhibit REJ29, a Reading Post photo which shows Ms Johnson in the Greenham main gate camp eviction on 4th April 1984 [UCPI0000036829]

⁹⁸ [UCPI0000036777/122]

⁹⁹ [MPS-0745970/28]

¹⁰⁰ [UCPI0000036662/75-81, 89]; [UCPI0000036948/31-32]

¹⁰¹ [UCPI0000036948/27]; [UCPI0000036777/83]

¹⁰² [UCPI0000036777/77]

¹⁰³ [MPS-0745970/20]

¹⁰⁴ Ibid.

¹⁰⁵ [MPS-0745970/28]

51. Any suggestion that the unfocused policing of HN33 and her colleagues was necessary or proportionate in any circumstance is roundly rejected by the Core Participants that we represent.

IV – POLITICAL POLICING

*“Behind the violence and hostility that escalated towards Greenham activists during the period from 1982-87 was an elaborate surveillance mechanism that seems to have served party political propaganda objectives rather than peace or security.”*¹⁰⁶ – Rebecca Johnson

52. Evidence heard in T1 showed that the work of the SDS was dominated by political surveillance for the Security Service, under the cover of countering subversion.¹⁰⁷ The evidence in T2 is likely to show that Margaret Thatcher’s Government provided an even more permissive environment for this kind of “*sensitive*” work to be carried out, and closer political influence over targeting decisions.

53. A 1980 Home Office document disclosed in T1 showed that, the eyes of the Security Service, Ministers working under Thatcher “*did not appear to share their predecessors’ disquiet about the work of Special Branches*”.¹⁰⁸ Sir Brian Cubbon in his evidence explained this to mean that a Conservative Government was likely to face less pressure to address concerns that the Special Branch of the MPS was taking “*an excessive interest in left-wing activities*”.¹⁰⁹

54. HN33 was asked to join the SDS by Detective Chief Inspector Derek Kneale, because Prime Minister Thatcher “*wanted to know what the Greenham Women were doing*”.¹¹⁰ The Core Participants that we represent respectfully invite the Chair to record this very important aspect of HN33’s evidence when the final report is delivered.

55. Consideration of the political context in which such a request was made is essential to fully understand its significance. Alongside many other groups seeking to effect social and political change in the T2 period, the Greenham Women attracted particular hostility from Prime Minister Thatcher and Ministers of her Government, who were concerned by popular support for the campaign and growing public unease over the basing of US weapons, and in particular cruise missiles, in the UK.¹¹¹ Secretary of State for Defence Michael Heseltine told the Commons that the government had a duty to defend its installations even if that meant shooting Greenham Common peace protesters.¹¹²

56. Government documents disclosed to Rebecca Johnson under the Public Records Act 1967 show that, in December 1982, Ms Thatcher received advice from Conservative Peer Lord

¹⁰⁶ [UCPI0000036777/166]

¹⁰⁷ See, for example, the Closing Submissions for T1 on behalf of the Co-operating Group of NPSCPs, pages 23-27, at: https://www.ucpi.org.uk/wp-content/uploads/2023/02/20230222-T1_Closing_Statement-NPSCPs.pdf

¹⁰⁸ [UCPI0000004715/5]

¹⁰⁹ [UCPI0000035282/32]

¹¹⁰ [MPS-0745970/3]

¹¹¹ REJ24, Letter from Defence Secretary John Nott to Prime Minister Margaret Thatcher titled “Nuclear Issues”, dated 20th October 1982 [UCPI0000036801]

¹¹² <https://www.theguardian.com/uk/2007/may/03/greenham.yourgreenham4>;
<https://theguardian.newspapers.com/image/259588190/?terms=%2522cruise%2522%2520&match=1>

Beloff to “*abandon the kid-gloves approach and seek publicly to discredit the Greenham Common women and their supporters*”.¹¹³ This would involve obtaining “*two kinds of intelligence*”; evidence of the sources of the movement’s finances and “*a proper investigation of the background and characters of the Greenham Common women*”, in order that “*the aura of martyrdom can be stripped from them*”.¹¹⁴ As such, “*ministers should brief our intelligence sources accordingly*”.¹¹⁵ Ian Gow MP, Ms Thatcher’s Parliamentary Private Secretary, responded to confirm that Lord Beloff’s advice had been shared with the Prime Minister, and copies had been sent to “Cecil” and to John Biffen, Lord President of the Council, who presided over Privy Council meetings. On 6 January 1983, the Prime Minister appointed Michael Heseltine as Secretary of State for Defence. Within weeks he established Defence Secretariat 19 (‘DS19’); a secretive unit set up within the Ministry of Defence to combat CND and calls for nuclear disarmament.

57. Documents disclosed in T2 evidence a particular interest in the Greenham Women and HN33 on the part of the Security Service throughout the period of her deployment.¹¹⁶ A note authored by the Security Service (F6) summarising a meeting with Detective Chief Inspector of the SDS, Dave Short, on 24th February 1983, records that DCI Short was “*under pressure to do something about the Greenham Common Women*”, because of concerns raised by Thames Valley Police about the costs of policing the site, and that “*a woman had been recruited from SB and would be joining the SDS office on 7 March*”.¹¹⁷ On 18th July 1983, a note suggested that the Security Service (F6) were pleased that the “*new “peace woman is making some progress... she was put into contact with Lambeth Peace Women and will shortly establish contact with the Greenham London Office*”.¹¹⁸ DCI Short duly provided her “*personal particulars*” to the Security Service.¹¹⁹ A Security Service (F6) Note for File records a telephone discussion with DCI Short in relation to HN33. The note lists related groups, along with addresses, as the Greenham Common Women Support Group HQ, a house for rest and recuperation provided to Greenham women by Islington Council, LWP, Women for Life on Earth and Women versus Cruise.¹²⁰

58. It is notable that the rationale for the SDS’s work for the Security Service was defined by the MPS in T1 as to assist the Security Service in its “*counter-subversion work*”.¹²¹ Yet, as above, HN33 was aware throughout her deployment with the SDS that the Greenham Women were not subversive. She did not witness *any* subversive activity during her time with them.¹²² Security Service interest in Greenham must, therefore, have been motivated

¹¹³ REJ23, letter from Lord Beloff to Prime Minister Margaret Thatcher, titled “The anti-CND campaign”, 14th December 1982 [UCPI0000036800]

¹¹⁴ Ibid.

¹¹⁵ Ibid.

¹¹⁶ [UCPI0000036109/2]

¹¹⁷ [UCPI0000029193/1-2]

¹¹⁸ [UCPI0000027539/2]

¹¹⁹ Ibid.

¹²⁰ [UCPI0000028728/1-2]

¹²¹ “Tranche 1 Closing Statement of the Metropolitan Police Service”, 14th February 2023, p.54, at:

https://www.ucpi.org.uk/wp-content/uploads/2023/02/20230220-CL-T1-Closing_Statement.pdf

¹²² [MPS-0745970/25]

by something else. The Core Participants that we represent strongly suspect that motivation was an inappropriate and unacceptable desire to obtain material which could be deployed in the press, in an effort to discredit the Greenham Women and their cause.

59. As Jane Hickman explains in her witness statement, the tone of media coverage of the protests at Greenham shifted in 1983.¹²³ From March 1983 onwards barely a week passed without one paper or another denouncing the camp.¹²⁴
60. In 1984 Cathy Massiter, an MI5 employee, was sufficiently distressed by the politicisation of intelligence and the surveillance of CND and other peace movement figures to break cover and whistle blow to Channel 4's 20/20 Vision programme, "MI5's Official Secrets".¹²⁵ She disclosed the extent of surveillance of the peace movement and explained that intelligence was circulated through Whitehall by MI5 in a series of "Box 500" reports and passed to DS19. She also revealed that DS19 was leaking evidence to the press to discredit peace campaigns. The evidence of Security Service interest in Greenham suggests that this would have included the products of surveillance of the Greenham Women, collected, at least in part, by the SDS. DS19 in effect carried out Lord Beloff's advice to Thatcher, to garner information on sources of finance and the characters, politics and lifestyles of prominent people that could be pumped into media to undermine and discredit the 'popular' Greenham Women and CND and keep the Conservative Party in Government.
61. A Security Service briefing note dated 8th March 1984 titled "*F6 Brief: Greenham Common Women's Peace Camp*" poses (and answers) questions such as "*Who are the main organisers at the camp, at the London Office (79 Petherton Road, N5), in Greenham Women Against Cruise (5 Leonard Street, EC2) and in Lambeth Support Group and in any of the other support groups?*".¹²⁶ The note also asked what sort of relationship existed between these "elements", and to what extent do various named people influence each of the "various elements". Detail is provided in relation to the four women named, including that one "*still speaks on behalf of the camp although there are indications that relations between them may be strained*", links with left-wing groups, such as Socialist League, and alleged roles within the camp.¹²⁷ This is exactly the sort of internal gossip used to discredit the Greenham Women in the attack pieces published in this period. Questions posed also included:
- a. "*Who controls finances and from where does it come*",
 - b. "*Where are the local safe bases and who runs them (IE, details of houses in the Greenham area where campers may wash, have a meal, sleep overnight)*"; and
 - c. "*What policies do the various elements advocate in respect to future action*"?

¹²³ [UCPI0000036662/67-68]

¹²⁴ Ibid. See also Jane Hickman Exhibit "Press articles 1982 - 1984 showing changing attitude".

¹²⁵ HN65 also refers to Cathy Massiter's revelations and the Channel 4 documentary "*MI5's Official Secrets*" as demonstrative of the Security Service interest in CND [MPS-0743186/49]

¹²⁶ [UCPI0000029293]

¹²⁷ [UCPI0000029293]

62. Notably, a month after this report was prepared, on 9th April 1984, just after the camp suffered a large, long-planned eviction,¹²⁸ the Daily Express ran a series of unpleasantly personalised articles making untrue and inflammatory allegations about several women living at or associated with the Greenham camp, including Core Participants Rebecca Johnson and Jane Hickman.¹²⁹ This is just one of many examples of SDS or Security Service reporting which closely aligns to the tone and content of negative articles published in the media about Greenham in the T2 period.¹³⁰
63. It is revealing that Special Branch were aware that public knowledge of the practices of the SDS, and of HN33's activities in particular, would have led to condemnation and institutional embarrassment. A Special Branch note dated 6th May 1998, disclosed in T2, which considered whether HN33 could be returned to core uniformed duties in light of her history of SDS deployment, states:
- “At the height of the CND activities a number of potentially embarrassing exposes occurred, most notably the former Security Service officer Cathy Massiter who questioned the Service’s investigation into the activities of CND members. This produced widespread media interest, particularly as the organisation received support from notable individuals in society. HMG was forced to defend its position of investigating such groups on grounds of subversion. Clearly any revelation of police involvement in such groups would equally create considerable embarrassment. The potential for such revelation would be enhanced were DS HN33 to be posted to uniform duties on area.”¹³¹*
64. The risk assessment concluded that the risk of HN33 being recognised by “former associates” had the potential to “reveal SDS operations” and “cause embarrassment to the Commissioner”.¹³²
65. The political nature of the surveillance carried out is why, in our submission, Special Branch knew that a such an exposé would cause “considerable embarrassment”. Like DS19, as revealed by Cathy Massiter, the SDS represented an unacceptable misuse of state surveillance powers for political ends. For that reason, it is clear that those responsible would go to great lengths to keep the unit hidden from the public.

V – QUESTIONS THE INQUIRY MUST ANSWER

66. Just weeks before the commencement of T2 hearings, Jane Hickman, Rebecca Johnson and Hilary Moore were told by the Inquiry that HN33, “Lee Bonser”, was not prepared to give evidence before the Inquiry. The explanation that has been given is that she is abroad and therefore cannot be compelled by the Inquiry to attend.
67. The Inquiry has at various stages made clear that it will facilitate special measures specifically for witnesses who are abroad, including the giving of evidence by television

¹²⁸ [UCPI0000036777/131-137]

¹²⁹ Jane Hickman Exhibit “Press articles 1982 - 1984 showing changing attitude”, p.10

¹³⁰ [MPS-0745970/13-14]; see Jane Hickman’s analysis of the links between HN33 reporting on 3rd October 1983 [UCPI0000019613] and Mail on Sunday article 20th November 1983 [UCPI0000036662/69-70]

¹³¹ [MPS-0003062]

¹³² [MPS-0003062]

link from a room convenient to the witness.¹³³ This was suggested by the MPS, to enable police witnesses who live abroad to give evidence.¹³⁴

68. It is therefore extremely disappointing to Jane Hickman, Rebecca Johnson, and Hilary Moore, that such a key witness refuses to attend to account for her actions before the Inquiry. They invite the Inquiry to take this into account in the weight given to her evidence, where it conflicts with the evidence of Jane Hickman and Hilary Moore, who are willing to give live evidence despite the personal cost of doing so.
69. Rebecca Johnson, who is also willing to give live evidence in relation to the reports of HN33, HN88 and HN65, has not been called by the Inquiry, but continues to make clear that she believes she would add to the Inquiry's understanding of the issues raised in the reports of these UCOs.
70. HN33's failure to attend leaves the large number of questions that have preoccupied Jane Hickman, Rebecca Johnson and Hilary Moore since becoming aware of her false identity potentially unanswered. It will therefore be imperative in later phases of the Inquiry's T2 investigations that appropriate questions are put to those who should have been responsible for managing and overseeing the deployment of HN33 and other officers who spied on the Greenham women, as well as those who set the political direction for the surveillance.
71. In line with its Terms of Reference, Jane Hickman, Rebecca Johnson and Hilary Moore would respectfully invite the Inquiry to consider these key lines of inquiry in T2:
 - a. Regarding the scope of undercover police operations:
 - i. When did surveillance of (a) these Core Participants¹³⁵ and (b) the groups that they were a part of start?¹³⁶
 - ii. How many undercover officers spied on (a) these Core Participants and (b) the groups that they were a part of?¹³⁷
 - iii. To what extent did this include electronic monitoring, such as phone tapping?¹³⁸

¹³³ See, for example, "Chairman's statement about the conduct of evidence hearings", 19th December 2018, §§10-11, at: https://www.ucpi.org.uk/wp-content/uploads/2018/12/20181219-Chairman_statement_conduct_of_evidence_hearings.pdf

¹³⁴ "MPS Written Observations on the Public Consultation on the Approach to the Administration of Evidence Hearings", 27th September 2018, §16, available at: https://www.ucpi.org.uk/wp-content/uploads/2019/01/20180927-MPS_CL_submissions-hearing_consultation.pdf

¹³⁵ Despite HN33's deployment with LWP commencing in June 1983, Hilary Moore's file number dates back to 1975 and has file cut number '402', denoting 'Extreme Left Wing'. Jane Hickman's number dates back to 1977.

¹³⁶ The SDS Annual Report of 1982, which predated HN33 "Lee Bonser's" deployment, stated that the "*Peace Camp Movement*" was "*directly penetrated or indirectly monitored by SDS officers*".¹³⁶ It further detailed activities and planned political actions at Greenham Common.

¹³⁷ HN33 identifies that reports relating to what was happening in the camps "*could have been from another source*". She is also identified with reports relating to events that she did not attend [MPS-0745970/13-14].

¹³⁸ HN33 states "*Telephone numbers could potentially be useful to Special Branch should consideration be given to the need for electronic surveillance*" [MPS-0745970/18]

- iv. Were general reports received by or shared with SDS, Special Branch or the Security Service relating to the July 1987 Conference of European Nuclear Disarmament in Coventry, which was attended by various British and wider European peace and environmental groups (and probably UCOs connected with such groups)?¹³⁹
- b. Motivation for undercover policing:
- i. What was the true motivation for the targeting of these Core Participants?
 - ii. For what purpose was intelligence shared with the Security Service and other government departments in relation to GWPC, LWP and GWACM? To what extent was the targeting of these groups influenced by the Security Service and other government departments?
 - iii. What was the extent of US knowledge of and involvement in activities of the SDS? To what extent were targeting decisions made on the basis of US state interests?¹⁴⁰
 - iv. Was material gleaned by HN33 provided directly or indirectly to the media or to individual journalists? To what extent did a desire to publicly undermine the Greenham women influence targeting decisions?
- c. State of awareness of undercover policing operations of Her Majesty's Government:
- i. To what extent were senior government figures, including Prime Minister Margaret Thatcher and Secretary of State for Defence Michael Heseltine, (a) aware of and (b) directing or influencing the activities of the SDS?
- d. Adequacy of justification, authorisation, operational governance and oversight:
- i. Who authorised the targeting of LWP/Greenham women, and on what purported grounds?
 - ii. Given the total absence of evidence found by HN33 of any behaviours or activities to justify surveillance, why was LWP targeted for so long? Who authorised HN33's ongoing deployment?
 - iii. If LWP was surveilled simply to gain access to Greenham Women's Peace Camp (as HN33 suggests), what was the purpose of such extensive and detailed reports on LWP and its members?

¹³⁹ [UCPI0000036777/156-164]

¹⁴⁰ A cover letter to a Special Branch intelligence report contains a note authored by a "W. I. Greenup" (presumably William Greenup, Chief Superintendent of C-Squad), dated 17th November 1983 which states "*inform US Embassy, stressing delicacy of the source*" [MPS-0733854/1].

- iv. What justification was there for joining LWP rather than simply joining the Peace camp which was, as Rebecca Johnson has said, there for all women?
- e. Adequacy of selection, training, management and care of undercover officers:
 - i. Why was HN33 sent into the field and allowed to report on discussions subject to legal professional privilege without any training or guidance?¹⁴¹
- f. Finally, in relation to the sharing of intelligence products more widely (which relates to scope, motivation and justification):
 - i. Was material gleaned by HN33, HN88 or HN65 or other undercover officers during the period 1982 to 1992 provided directly or indirectly to politicians, right wing groups or vigilantes, or any person or group with known histories of violence against women?
 - ii. Was the MPS, Special Branch or the SDS aware of the extensive use of excessive force against female peace activists by police officers or soldiers, some of it extending to sexual abuse?
 - iii. Was the MPS, Special Branch or the SDS aware that uniformed officers frequently ignored the use of force against female peace activists by Newbury Council bailiffs, public officials and other members of the public?

VI – CONCLUSION

72. The evidence in T2P1 shows, as in T1, that the SDS was a secretive, cynical, political policing unit with no regard for the civil, political and democratic rights of those it spied upon. The approach to intelligence gathering was simply to sweep up as much information as possible to meet the political objectives of the Security Service and Government.
73. The conclusion of the Inquiry's T1 Interim Report, and the starting point for the Inquiry's T2 investigations, is that the ends used by the SDS did not justify the means, and, had the methods used by the SDS been publicly known at the time, the SDS would have been brought to a rapid end.¹⁴² Jane Hickman, Rebecca Johnson and Hilary Moore endorse this conclusion. Had the SDS been brought to a rapid end in the T1 period, they would have been spared the unbelievably distressing impacts on their lives of SDS surveillance, and the further impacts arising from their discovery of this surveillance on them. There would, we suggest, have been gross public abhorrence at the hypocrisy of the existence of this unit, had it been known that the politically authorised means of public surveillance adopted by the SDS within our democracy, were so little different to the publicly reviled means of surveillance adopted by the eastern communist states whose suggested threat to

¹⁴¹ [MPS-0745970/27-28]

¹⁴² Undercover Policing Inquiry Tranche 1 Interim Report, p.96, at: <https://www.ucpi.org.uk/wp-content/uploads/2023/06/Undercover-Policing-Inquiry-Tranche-1-Interim-Report.pdf>

our democracy and democratic values, was so frequently evoked by government ministers and tabloid media to justify why the UK needed nuclear weapons.

74. The only possible conclusion is that no CP should have been subject to SDS surveillance in the T2 period because the unit should not have existed. The absence of express written authorisations, detailed tasking and regular review of the justification of ongoing undercover surveillance indicate that the SDS was a unit out of control, and apparently subservient to political prejudice and political masters.
75. The fact that HN33 could have been deployed with a peaceful group of women anti-nuclear activists, a deployment that was incapable of justification, with the knowledge of her managers in Special Branch, seniors in the MPS, Security Service and, in all likelihood those in high political office, shows that the SDS was a policing unit that should not have been allowed in a democratic system. Special Branch knew that these operations were unacceptable; that is why it was done in secret.
76. The SDS was a unit, within a wider structure within the MPS and Security Service, that was not motivated by any proper policing purpose. It was incapable of properly balancing the civil and democratic rights of individuals against a desire for unlimited intelligence capture.¹⁴³ Such a unit should not have existed, and the British state should certainly never have used it to spy on the Greenham women.

JAMES WOOD KC

Doughty Street Chambers

LILY LEWIS

Garden Court North Chambers

Hodge Jones & Allen

21st June 2024

¹⁴³ That the SDS and later units violated fundamental human rights, including the right not to be subjected to inhuman and degrading treatment, the right to private and family life, and freedoms of expression, assembly, and association, was articulated clearly by the Investigatory Powers Tribunal in *Kate Wilson v Commissioner of the Metropolis and National Police Chiefs Council (NPCC)* [2021] UKIPTrib IPT 11/167/H.