

IN THE MATTER OF THE UNDERCOVER POLICING INQUIRY

**AND IN THE MATTER OF THE GROUP OF CURRENT AND FORMER MPS
OFFICERS REPRESENTED BY THE DESIGNATED LAWYER TEAM**

**WRITTEN OPENING STATEMENT ON BEHALF OF
THE DESIGNATED LAWYER OFFICER CORE PARTICIPANT GROUP
TRANCHE 2, PHASE 1: THE SPECIAL DEMONSTRATION SQUAD
UNDERCOVER DEPLOYMENTS 1983-92**

(FOR HEARING: 2 JULY 2024)

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1. Introduction

1.1 This opening statement is made on behalf of the DL officer core participant group and, in particular, the 31 individuals who were members of the SDS during T2 (see §7.1 below).¹ This group comprises 22 undercover officers, five back office administrators and three managers and it represents the vast majority of the surviving T2 membership of the SDS.² (The abbreviations used in the previous DL openings and closing for T1 are adopted herein.)

2. Recap

2.1 This opening does not repeat points already made in the DL T1 openings and closing regarding specific issues which also arise in T2 (e.g. cover identities and sexual relationships³) but the following basic points of principle should be borne in mind:

- (1) members of the public have the right to demonstrate and protest and also the right to go about their lives without obstruction or inconvenience and the police have (a) the primary duty of maintaining public order and tranquillity, preventing disorder and facilitating the exercise of these competing rights, (b) the secondary duty of preventing and detecting criminal offences and (c) the general power to do anything not otherwise prohibited by law (DL T1P1 opening, pt 3.1; DL T1 closing, §1.2.2);
- (2) MPSB was obliged to provide (a) intelligence and threat assessments about public order to the MPS Public Order Branch and (b) assistance, support and intelligence about extremism, subversion and terrorism to MI5 (DL T1P1 opening, §§3.3.1-3.3.4);

¹ HN20 is a T1 officer transferred into T2 and HN9's evidence will be dealt with in T3.

² Leaving aside those who are deceased (HN12, HN22, HN51, HN82, HN89 and HN99) or have not engaged (HN11 (Chitty) and HN95 (Scutt)), the complement of non-DL officers in T2 comprises seven undercover officers (HN2 (Coles), HN5 (Dines), HN10 (Lambert), HN19 ("*Malcolm Shearing*"), HN58, HN85 (Pearce) and HN78 (Morris)), one back office administrator (HN108) and one manager (HN115 (Wait)).

³ See DL T1P1 opening, pt 8 and DL T1 closing, pt 4.

- (3) the policing of demonstrations and protests, particularly without recourse to special units, measures and equipment, is very challenging (DL T1P1 opening, §§4.1.1-4.1.3 and 5.3.7-5.3.8; DL T1 closing, §2.3.13) and, when some of those involved are extremists and/or will not cooperate with the authorities, it requires advance intelligence about their likely numbers, objectives, intentions and mood (DL T1P1 opening, pts 4.2 and 5.5);
- (4) under-policing and over-policing of public order events can both have serious adverse consequences for the maintenance of order and the fulfilment of other police duties and, furthermore, disorder can have very serious adverse consequences in terms of deaths, injuries, damage and loss and, more widely, in terms of its impact on police effectiveness, recruitment and retention and society as a whole (DL T1P1 opening, §§5.3.5-5.3.6, 5.3.11-5.3.17 and 5.3.29; DL T1 closing, §§2.2.4-2.2.9);
- (5) public order and counter-subversion intelligence is collected in order to help foresee, assess and manage *risks* whose eventuation could be very serious (see (4) above) and its collection is necessarily (a) conducted proactively and prospectively rather than reactively or retrospectively and (b) to some extent a hit-and-miss exercise (DL T1P1 opening, pts 4.2 and 5.5; DL T1 closing, §§2.3.1-2.3.2);
- (6) an absence of violence does not define public order and, by the same token, violence is neither a necessary condition of disorder nor a pre-requisite to police action - public order is a state of tranquillity and non-violent demonstrations and protests can and do involve disorder (DL T1P2 opening, pt 6);
- (7) an absence of violence or disorder at a demonstration, protest or other public order event also does not indicate an absence of risk and it may simply indicate successful public order policing (DL T1 closing, §§2.1.1-1.2.3);
- (8) the capacity of an individual or group to threaten the safety or well-being of the state or undermine democracy cannot be assessed without intelligence about that individual or group (DL T1 closing, pt 3.1);

(9) the gathering of intelligence about potential (risks of) public disorder or subversion which is negative can be reassuring and save resources and the collection of such intelligence may therefore be appropriate and justified (DL T1, closing, §3.2.5).

2.2 The self-evident need for public order intelligence remains just as important today and was recently reiterated in the report of Lord Walney, Independent Adviser on Political Violence and Disruption in the Home Office, “*Protecting our Democracy from Coercion*” (2024, HC 775), §1.9:

To better counter the influence and law breaking of extreme political protest movements, police should have a robust understanding of these networks and extensive intelligence. The police should improve intelligence and collaboration on political violence and disruption, especially between central intelligence gathering functions and local operational capabilities.

3. Context

3.1 From the perspective of the MPS and MPSB, the key contextual factors relevant to T2 were the continuation of the Cold War and the Northern Ireland Troubles and the following events:

1981 Greenham Common (outside MPD, but involving MPS);
PIRA Chelsea Barracks bombing;

1982 Falklands War;
Air India workers strike;
PIRA Hyde Park and Regent’s Park bombings;
ARM Downing Street bombing;

1983 PIRA Harrods bombing no.1;
death of Colin Roach;

1984 miners strike (to 1985);
murder of WPC Yvonne Fletcher;
PIRA Brighton bombing;

1985 ARM/ALF car bombing;

- Brixton, Broadwater Farm and Peckham riots;
- 1986 South African Embassy picket and protests (to 1990);
Wapping industrial dispute;
ALF incendiary device campaign;
- 1987 Debenhams bombings;
- 1988 Lockerbie bombing;
- 1989 Salman Rushdie fatwa;
fall of the Berlin Wall;
- 1990 Poll Tax riot;
PIRA London Stock Exchange bombing;
- 1991 first Gulf War;
PIRA Paddington and Victoria train station bombings;
PIRA Downing Street mortar attack;
Le Pen visit to London;
- 1992 PIRA Baltic Exchange bombing;
“Battle of Waterloo”;
- 1993 murder of Stephen Lawrence;
Welling disorders;
election of Derek Beackon;
Welling riot;
PIRA Harrods bombing no.2.

3.2 Responsibility for Irish Republican Terrorism in mainland Great Britain was transferred from MPSB to MI5 on 1 October 1992 and, as a result of this and the end of the Cold War, MI5 *“scaled back”* the number of groups which it *“investigated, studied and monitored”* on counter-subversion grounds at the same time (Witness Y, §§37 and 40).

3.3 From the SDS perspective, the T2 era pre-dated computerisation, the introduction of psychometric testing and changes to the way in which cover identities were created.

4. Public order

4.1 The general trend during T2 was away from large-scale demonstrations of the kind more frequently seen in the 1960s and 1970s towards smaller-scale protests and “*direct actions*”. This was partly a result of an increase in animal rights / anarchist extremism during the 1980s and this development was also reflected in the establishment of ARNI within the MPS Criminal Intelligence Branch in January 1986 and its subsequent transfer to MPSB in June 1986.⁴

4.2 That said, it is also important to note:

- (1) The new offences and police powers provided for by the Public Order Act 1986 were intended to and did have an impact by making disorder easier to control. They also increased the likelihood of undercover officers being arrested.
- (2) There were fluctuations, e.g.: “*There was a marked increase in public demonstrations throughout the year as various groups took to the streets to protest against controversial issues which arose either as a direct result of unpopular Government policies or other external influences*” (SDS Annual Report for 1988, §23); “*Whilst there was a temporary respite in hostile demonstrations in 1989, this year has seen a resurgence of political activity and confrontations with police. Accordingly, the prospects for the remainder of 1990/91 offer no sign of a significant change from the present situation*” (SDS Annual Report for 1989-90, §76).
- (3) Disorderly confrontations between the far right and far left continued throughout T2 and began to escalate in the early 1990s as the popularity of the far right (in particular the BNP) increased.⁵

⁴ Established pursuant to report of ACPO Crime Working Party on “*Extortion and Product Contamination in the Food Industry and Criminal Activities of Animal Rights Groups*” dated June 1985 and reconstituted as a Common Police Service funded by government from 1 April 1990.

⁵ The same process occurred with the NF between 1972-79 (DL T1 closing, §§2.1.23ff).

4.3 Notable public order events and trends for T2 are referred to in the annual reports of the MPS, MPSB and SDS from that era as follows (although note that the MPS reports became much shorter and less detailed as T2 progressed and MPSB reports are only available for 1984-87):

(1) 1983

17 public order events involving the deployment of more than 1,000 officers and 166 involving the deployment of more than 100 officers; and five far right demonstrations banned under the Public Order Act 1936, s.3 (*Commissioner's Annual Report for 1983*, p.50 and Appendices 3ii-3iii; *Hansard HC*, vol.64, col.826, 27 July 1984, WA). One of the events referred to in Appendix 3ii took place on 30 July 1983 and related to “*Events on ‘Y’ District - the ‘Albert Mariner public enquiry campaign’*” (policed by 1,762 officers). This appears to refer to the death of an OAP named Albert Mariner said to have been killed by a brick thrown in connection with an NF election meeting on 3 May 1983. A written answer to a Parliamentary Question recorded that there were nine arrests at the 30 July 1983 event and also (*Hansard HC*, vol.79, col.270, 20 May 1985, WA):

- (a) 22 arrests at demonstrations arising out of the death of Colin Roach on 22 January 1983;
- (b) 26 arrests at a BUAV demonstration on 24 April 1983;
- (c) 28 arrests at a Youth CND march on 7 May 1983;
- (d) 24 arrests at a BUAV demonstration on 12 November 1983.

Note also the *Commissioner's Annual Report for 1983*, pp.49-50:

Unfortunately many of those within animal welfare organisations have not shown the same attitude in seeking to act in co-operation with police and to demonstrate in a peaceful manner. Their supporters have claimed responsibility for numerous cases of criminal damage throughout London. Disorder and violence have been features of several events. In a march from Clapham Common to Carshalton Beeches in April,

violence broke out at several points and 26 arrests resulted. At organised marches in Bromley in July and Islington in November, further confrontation took place resulting in three arrests. There have also been a number of spontaneous events by animal rights organisations which have resulted in over 100 arrests, including 73 made after an entry into a laboratory on a Sunday afternoon. The ability of my officers to respond to this type of incident cannot be pre-planned and this means that men have to be withdrawn from duties on divisions at short notice, severely reducing the level of local public service and leaving vital jobs undone or to be completed with unacceptable lengths of delay.

(2) 1984

20 public order events involving the deployment of more than 1,000 officers and 162 events involving the deployment of more than 100 officers⁶; the former set of events included an anti-apartheid march on 2 June 1984 (28 arrests) and a CND march and Economic Summit events on 9 June 1984 (201 arrests); and three demonstrations banned under the Public Order Act 1936, s.3 (*Commissioner's Annual Report for 1984*, p.68 and Appendices 3ii-3iii; and *Hansard HC*, vol.79, col.270, 20 May 1985, WA). Note also *ibid.*, pp.67-68:

At first sight, the trend of the past two years has been maintained with the number of major demonstrations in decline, but the trend is more apparent than real. Reductions in manpower at the planning stage have meant fewer events being defined as "major" - in our organisation, one which requires the use of 100 or more officers.

(3) 1985

25 public order events involving the deployment of more than 1,000 officers; and an AAM rally in Trafalgar Square attended by 20,000 resulted in disorder and 144 arrests (*Commissioner's Annual Report for 1985*, Appendix 2ii and *MPSB Annual Report for 1985*, p.12). Note also the *Commissioner's Annual Report for 1985*, pp.10-11:

...no-one should fail to recognise that fine judgements are called for about the potential of each march or meeting for violence and the appropriate level of policing we should provide. If manpower is insufficient and disorder breaks out because determined groups assess our capability for containing them as low, then we face censure.

⁶ The events involving the deployment of more than 100 officers between 1 January and 25 July 1984 are listed at *Hansard HC*, vol.64, col.826, 27 July 1984, WA.

Alternatively, we put out deterrent strengths of officers with the result that trouble-makers, sensing defeat in the offing, behave themselves; in this case, the event is peaceful and we are likely to be criticised for having too many officers deployed at a peaceful event...

Under the cloak of rightful and sensible protest, small groups go out to seek not to persuade but to do injury. Words, jostling and even spittle seldom move the constables in a cordon to react, but if they are beaten with placard-poles, rocks are thrown at them or, as at Trafalgar Square, cast-iron is broken and hurled at them, then of course, protective shields and visored helmets are brought in. Immediately these provide an anonymous - and even more attractive - target for those so disposed and the missiles increase in force and volume...

(4) 1986

36 public order events involving the deployment of more than 1,000 officers; policing the News International dispute at Wapping involved an average daily deployment of 300 officers, the deployment of more than 1,000 officers on 12 occasions, “*disturbing levels of violence... on numerous occasions*” and a total of 1,375 arrests; and there were 30 CLAAG demonstrations, eight of which resulted in disorder and a total of 54 arrests (*Commissioner’s Annual Report for 1986*, pp. 21 and 38-39 and Appendix 2vi). Furthermore, there were over 100 ALF incidents in the MPD ranging from minor criminal damage to major arson attacks (*MPSB Annual Report for 1987*, p.17). Note also the *Commissioner’s Annual Report for 1986*, pp.20, 35-36 and 67-68:

The public order focus of 1986 was on the News International plant at Wapping... problems of regulation arose when respect for other individual and collective rights were abandoned along with the duty to abide by the criminal law. There is no right to intimidate, far less to injure, other trade unionists who wish to print or distribute newspapers. There is no right to damage vehicles. There is no right to hurl lethal missiles from the anonymous safety of a crowd that cause injury to police officers and fellow demonstrators alike. There is no right to block roads in an attempt to deny access or egress at premises. All these acts are specifically, and clearly, contraventions of the criminal law which my officers have a duty to enforce. In doing so at the Wapping dispute, 410 of them had sustained injury by the end of the year.

...

The difficulties facing the Force in relation to public order are unpredictable and there is always some major new policing problem to address. On many occasions, the role of the police requires a judicious balance between supporting the right to demonstrate or to picket and

the right of all citizens to pursue their livelihoods unhindered and free from the fear of disorder.

It should be remembered that for each police officer deployed at a public order event one less officer is available for day-to-day duties. Alternatively, officers may be required to work vital rest days which, if on a too frequent basis, is disruptive to home life and can so easily become a cause of stress. Rest day working also involves higher overtime spending from our finite budget, and is therefore avoided wherever possible.

...

One responsibility of Special Branch is to assess the level of tension and disorder during public order events and 1986, in particular, placed considerable demands on officers involved in this work. The results highlighted the need for constant monitoring of extremist groups who seek to demonstrate in other than peaceful ways.

(5) 1987

14 public order events involving the deployment of more than 1,000 officers and the Force Special Operations Room was used to control and support major events on 24 occasions (*Commissioner's Annual Report for 1987*, p.26 and Appendix 2x)). Note also *ibid.*, pp.26 and 38:

There has been a noticeable shift in the pattern of protest within society, moving away from the mass march or demonstration towards small but vociferous protest groups.

...

The responsibility of Special Branch to assess the level of threat of terrorism and disorder at forthcoming public order events continued to place considerable demands on the squads involved. Although the total of 554 assessments in respect of terrorism and public order marked a 28% decrease compared with 1986, this was wholly attributable to one particular factor. If that factor is disregarded, the underlying trend of a steadily increasing demand for such assessments has continued.

Note too that the disorders at Wapping continued into 1987. See statement by the Home Secretary regarding the first anniversary of the dispute on 23 January 1987 (*Hansard HC*, vol.109, col.21, 26 January 1987, Deb):

The police estimate that 12,500 people took part. When the march reached Wapping at 7.15 pm disorder broke out almost immediately. Cordons of police officers in ordinary uniform came under attack with missiles. At about 7.40 pm, a lorry being used by the demonstrators was overturned, and an attempt was made to set it on fire. Disorder then continued for some hours. Missiles were thrown at the police, including

rocks, bottles, ball bearings, darts, railings, scaffolding poles and pieces of paving stone. The police used mounted officers, and foot officers in protective equipment, to restore order. I understand that calm was restored by about midnight.

In all, 162 police officers were injured... The police know of 40 members of the public who were injured; there will have been others whose injuries did not come to police attention. I understand that 67 people were arrested, of whom 65 have now been charged with public order and other offences. Fifteen of those 67 people arrested are print workers.

This is the latest in a series of disturbances connected with demonstrations at Wapping. Over the past year, including last Saturday, 572 police officers have been injured, 1,462 people have been arrested, and over 1.2 million police man-hours have been spent. The total additional policing cost up to the end of 1986 is estimated at £5.3 million.

It is clear that some of those attending Saturday's demonstration armed themselves with ferocious weapons intent on violent attacks against the police...

(6) 1988

25 public order events involving the deployment of more than 1,000 officers and the Force Special Operations Room used to control and support major events on 37 occasions; and a student loan protest on 24 November 1987 resulted in 69 arrests and injuries to 72 police officers, five police horses and 18 members of the public (*Commissioner's Annual Report for 1988*, p.26 and Appendix 2ii).

(7) 1989

13 public order events involving the deployment of more than 1,000 officers and the Force Special Operations Room used to control and support major events on 45 occasions; prolonged serious disorder following a "Satanic Verses" protest on 27 May 1989 resulted in 115 arrests; and conditions imposed under Public Order Act 1986, s.12 on student protest on 16 November 1989 (*Commissioner's Annual Report for 1989*, pp.19-20 and Appendix, Table 6.1).

(8) 1990

21 public order events involving the deployment of more than 1,000 officers and the Force Special Operations Room used to control and support major

events on 37 occasions; “*Special Branch continued to monitor the involvement of both left and right wing extremists in demonstrations, and C Squad provided 45 written assessments in relation to public order matters*”; 408 arrests, 542 officers injured and more than £3,000,000 of damage done at Poll Tax riot on 31 March 1990; conditions imposed on follow-up demonstration on 20 October 1990 under the Public Order Act 1986, s.12; and 105 arrests at breakaway Brixton Prison demonstration thereafter (*Commissioner’s Annual Report for 1990*, pp.34-35 and Appendix 5.1). A statement on the Poll Tax riot by the Home Secretary included the following (*Hansard HC*, vol.170, col.893, 2 April 1990, Deb):

Some 374 officers of the 2,198 on duty were injured, of whom 58 required hospital treatment. Several officers were knocked unconscious, others received head injuries, and one officer sustained a fractured jaw and is still in hospital and has either now had or is about to have an operation. Eighty-six members of the public have reported injuries. Some of those people were in no way concerned in the demonstration but were bystanders who were attacked by the mob. Forty police horses were used and 20 were injured. There have been about 250 reports of damage to property, but the full extent of it has yet to be assessed...

(9) 1991-92

17 public order events involving the deployment of more than 1,000 officers and the Force Special Operations Room used to control and support major events on 34 occasions; “*Special Branch has continued to monitor the involvement of both left and right wing extremists in demonstrations and have provided 108 written assessments in relation to public order matters*”; anti-war demonstrations on 15 January and 15 February 1991 resulted in a total of 101 arrests; conditions imposed under Public Order Act 1986, s.12 on the Poll Tax march and demonstration on 23 March 1991 and a BNP march on 25 May 1991; and the latter event resulted in 21 arrests and injuries to 12 officers and one member of the public (*Commissioner’s Annual Report for 1991-92*, pp.46-47 and Appendix 5.1).

(10) 1992-93

Increase in far right vs far left confrontations connected with, e.g. David Irving meetings, the BNP bookshop in Welling, the “*Battle of Waterloo*” on 14

September 1992 (44 arrests) and the BNP AGM in Westminster on 24 October 1992 (*Commissioner's Annual Report for 1992-93*, p.52). Also note, *ibid.*:

Throughout the year, Special Branch has provided accurate and timely threat assessments to help with effective policing of public order events within the capital. There have been a number of occasions where the information provided has averted serious public disorder. On other occasions, thousands of man hours have been saved by ensuring the right level of policing.

(11) 1993-94

Welling demonstrations (*Commissioner's Annual Report for 1993-94*, pp.44-45):

- (a) 8 May 1993 - 3,500 demonstrators, serious disorder and looting, 42 police officers and 13 members of the public injured;
- (b) 15 May 1993 - conditions imposed under Public Order Act 1986, s.12;
- (c) 16 October 1993 - conditions imposed under Public Order Act 1986, s.12, 15,000 demonstrators, 3,200 police officers deployed at a cost of over £600,000, serious disorder, 21 police officers and 41 members of the public injured.

Note also *ibid.*, pp.44-46:

Almost every summer weekend during the year was taken up with left-wing and right-wing political demonstrations that often had the potential for serious public disorder and had great resource implications for police deployments.

...

There were other smaller-scale confrontations between left-wing and right-wing extremists during 1993/94. The likelihood of disorder breaking out, and the last minute notification of the locations of the events placed heavy demands on police personnel resources. In central London such events included:

- *British National Party march and rally on 25 April 1993, opposed by groups including the Socialist Workers Party, Youth Against Racism in Europe and the Anti-Nazi League;*
- *British National Party AGM on 6 November 1993, opposed by*

the Socialist Workers Party, Youth Against Racism in Europe, the Anti-Nazi League, Anti-Fascist Action, Revolutionary Internationalists League and Class War;

- *National Front Remembrance Day march on 14 November 1993, opposed by the Socialist Workers Party, the Anti-Nazi League and Anti-Fascist Action;*
- *Troops Out Movement 'Bloody Sunday' march and rally on 29 January 1994, opposed by the British National Party.*

4.4 The abovementioned reports make clear that there were both one-off incidents and also times and places which involved regular public disorder and confrontation between the far right and far left, e.g. Bloody Sunday, Remembrance Sunday and Brick Lane market.

5. Subversion

5.1 The statement of Witness Y confirms that MI5 did not apply the Harris definition of subversion during T2 and extensively investigated, studied and monitored almost every group reported on by the SDS, save for non-anarchist animal rights groups. See §§31-32 and 35:

In practical terms, it would nevertheless have been necessary for the Security Service to investigate, study or otherwise monitor individuals and groups who declared a subversive intention, or who were known to subscribe to a subversive ideology, in order to ascertain the extent to which they posed a security threat or could do so in future...

...the Service considered that its responsibility for protecting national security required it to monitor potential threats so that it could be in a position to anticipate them and keep government informed... For the purpose of discharging this monitoring function, it would have been necessary for the Service to maintain some awareness and visibility of the subversive scene as a whole. I expect that the main purposes of this exercise would have been: (1) to identify and assess new subversive groups; and (2) to guard against the possibility that groups or individuals who were known to have subversive intentions but were judged to lack the capacity to threaten the security of the state at a particular point in time might improve their capabilities and therefore become a more significant national security threat in future.

...

In some instances, MI5's study also encompassed groups which were not themselves judged to be subversive but which were thought to have been infiltrated by subversive groups and individuals. This latter category included peace groups which were assessed to have been infiltrated at the national leadership level by communists (most notably CND)...

5.2 This work included the compilation by MI5 of membership lists in respect of the groups it covered, “*The Service maintained comprehensive lists of known members of subversive groups as well as those who were deemed to sympathise with their views for purposes including vetting*” this was “*both as part of the basic investigation and in order to assist with the vetting of candidates for employment in sensitive posts*” (Witness Y, §§52 and 40(iv) respectively). Note that these lists included members and sympathisers.

5.3 Witness Y makes clear that MI5 could and would have sought to obtain the intelligence provided by the SDS from other sources had the unit not existed or had the two organisations not had such a close liaison relationship: “*while MI5 could have developed coverage of its own to obtain the intelligence reporting which the SDS then provided, SDS reporting meant that MI5 did not have to deploy time and resources in building and maintaining such coverage*” (§269). If the state would have invaded the privacy of the same people and recorded the same information in any event, this must be relevant to whether criticism of the SDS in particular is justified or worthwhile.

6. The SDS in T2

6.1 From 1990 onwards, the SDS annual reports contain statistics for intelligence reports produced and public order events covered (*SDS Annual Report for 1991-92*, §§14 and 18-19; *SDS Annual Report for 1992-93*, §§2.1 and 3.10):

Year	Reports	Events
1990	1,030	330
1991	1,016	371
1992	1,425	408

6.2 The number of public order events covered by SDS reports does not indicate the percentage of the overall total with a public order subject matter: in 1992, 611 of the 1,425 reports “*related to events affecting public order*”, i.e. 43% (*SDS Annual Report for 1992-93*, §3.10).

6.3 A comparison of the above statistics with those set out in the MPSB annual reports for 1983-87 (the only ones available for T2) suggests, at the very least, that SDS reports

accounted for a significant proportion of overall MPSB output and, given the Branch's other responsibilities, a very significant proportion of its public order coverage (*MPSB Annual Report for 1984*, pp.21-22; *MPSB Annual Report for 1985*, pp.21-22; *MPSB Annual Report for 1986*, p.26; *MPSB Annual Report for 1987*, pp.26-27).⁷

6.4 In terms of threat assessments:

- (1) MPSB produced 770 (approx.) threat assessments in respect of terrorism and public order in 1986 and 554 such assessments in 1987 (*Commissioner's Annual Report for 1987*, p.38);
- (2) C Squad produced 45 written assessments in relation to public order matters in 1990 (*Commissioner's Annual Report for 1990*, pp.34-35) and MPSB produced 108 written assessments in relation to public order matters in 1991-92 (*Commissioner's Annual Report for 1991-92*, pp.46-47).

6.5 Aside from content relating to the Communist Party of Great Britain and Militant Tendency - which were not covered by the SDS - there is clearly a significant (albeit not coextensive) overlap between the sections in the MPSB annual reports relating to extremism, subversion and public order and the scope of SDS intelligence.

6.6 T2 DL officers reported accurate, reliable and valuable intelligence on:

- (1) violent confrontations between far right and far left groups and violent attacks by each side on the other;
- (2) actual or potential connections between the groups it reported on and other

⁷ These pages set out annual statistics for: enquiries on individuals and organisations; reports on information obtained by officers; enquiries for MI5; meetings and demonstrations attended; and vetting requests. The statistics have not yet been cleared for publication, but it is assumed this will happen in due course as the corresponding statistics for 1978-79 were published by the inquiry in T1 (*MPSB Annual Report for 1979*, p.22; MPS-0727595/27).

groups;

- (3) splits within and connections or mergers between the groups it reported on and their various front organisations and proxies;
- (4) animal rights group protests, direct actions, home visits, attacks on businesses and criminal damage;
- (5) actual or potential connections between animal rights and anarchist groups;
- (6) actual or potential connections between the BUAV and more extreme animal rights groups;
- (7) actual or potential influence of extremist groups on instances of serious public disorder, particularly when such an influence was being speculated or claimed;
- (8) actual or potential influence of far left groups over CND, including the Soviet-backed CPGB;
- (9) the intentions of the Greenham Common Peace Camp in relation to the adjacent US military nuclear base;
- (10) other matters being dealt with in closed.

6.7 Given the Cold War context, issues (8)-(9) above engaged questions relating to national security and international relations which were of interest to HMG, including the PM.

6.8 The above reporting all assisted MPSB's understanding of the public order scene generally and its ability to provide the MPS Public Order Branch (A8 and TO20 during T2) with threat assessments and advice on public order risks.

6.9 It also assisted MI5 which:

- (1) was interested in far right, far left, Irish support group and anarchist deployments, regarded "*almost all*" SDS undercover officers as "*valuable*"

(UCPI0000023861) and debriefed HN25, HN90 and HN122, and the majority of closed DL officers in T2;⁸

- (2) requested that a target's home was checked out;
- (3) requested an item from a target's house.

6.10 The value of the intelligence to the MPSB Squads and MI5 is clear:

- (1) Both repeatedly expressed appreciation, gratitude and praise for the intelligence and requested more, as further evidenced by the available MI5 "*consumer comment*" forms and the results of the customer surveys first carried out and reported in the *SDS Annual Report for 1992-93*, pp.43-44.
- (2) Numerous SDS intelligence reports refer to T2 public order events - including demonstrations, protests and far right events - where the undercover officers present reported that disorder was avoided or contained by police action.
- (3) The *SDS Annual Report for 1992-93*, §2.2 refers to major disorder between the far right and far left being avoided as a result of SDS intelligence on at least six significant occasions and that number would have been seven if its intelligence in advance of the "*Battle of Waterloo*" had been heeded (§2.17). Indeed, the "*Events of Note*" at §§2.13-2.22 - which overlap with those addressed in the *Commissioner's Annual Report for 1993-94*, pp.45-46 (see §4.3(11) above) - refer to more than six incidents where advance intelligence helped police maintain order or prevent disorder.
- (4) More generally, it can be seen that the SDS correctly assessed and predicted an increase in BNP popularity and a corresponding increase in far right vs far left disorder in the early 1990s (*SDS Annual Report for 1990-91*, §§67-68 describe the decrease in BNP cooperation with the police and increasing public order

⁸ And possibly HN20.

threat).

7. DL officers in T2P1

7.1 The following are involved:

Live evidence:

- HN25 (“*Kevin Douglas*”, TOM / BFDC, 1987-91)
- HN56 (“*Alan Nicholson*”, BNP, 1990-91)
- HN65 (“*John Kerry*”, CND, 1980-84)
- HN90 (“*Mark Kerry*”, SWP, 1988-92)

Read evidence:

- HN20 (transferred from T1) (“*Tony Williams*”, anarchists, 1978-82)
- HN33 (“*Kathryn Bonser*”, LWP / GCWPC / SWP, 1983-86)
- HN88 (“*Timothy Spence*”, HCAPB / CND / HPMG / ELCARAPH, 1983-87)

Excused on health grounds:

- HN67 (“*Alan Bond*”, SWP, 1982-85)

8. Inquiry approach

8.1 As a matter of methodology and focus, the inquiry has tended to concentrate on the recovery, collation and analysis of surviving SDS documents (primarily intelligence reports) and has largely ignored other sources, the fact that many records are missing and the fact that many matters were never committed to writing in the first place (see below).

8.2 This concentration on a sub-set of documents is apparent from the inquiry’s r.9 requests, the submissions and oral questions of CTI and the T1 interim report which have all focused on the literal analysis of documents. Testing one intelligence report after another misses the overall cumulative picture and the fact that the contribution of the SDS was greater than the sum of its parts. The inquiry has also tended to assume that the narrow and incomplete set of recovered documents tells the full story of the SDS

and anything not corroborated by a written entry in a document attributable to the unit did not happen.

8.3 The inquiry accepted that MPSB threat assessments were vital to the operational policing of public order events and that it was not possible reliably to assess the contribution of SDS intelligence to those assessments (ch.6, §§3-5), but then went on to say that an analysis of *six* threat assessments - from a 14 year period covering thousands of public order events - suggested the contribution “*should not be overstated*”.⁹ It is unclear if this was intended to imply that the contribution has been overstated and, if so, by whom, but the sample size did not provide a sound evidential basis for any reliable statistical or factual finding, particularly given that the inquiry did not investigate the threat assessment process itself (see pt 10 below).

8.4 Most fundamentally, the inquiry’s approach has resulted in, first, the SDS being considered in a vacuum rather than as one cog in a larger machine (DL T1P1 opening, §9.3.3) and, secondly, a concentration on the means used to the exclusion of the ends. A meaningful assessment of justification is impossible without a sound evidence-based understanding of both the means and the ends and the relationship between them.

9. Missing documents

9.1 The inquiry has a relatively full set of SDS intelligence reports, but it is not complete and, in any event, it represented only one part of the unit’s output and does not reflect everything it did. In particular, it is clear that not every SDS intelligence report was disseminated to MI5 and the evidence of Witness Y is that MI5 would not have “*indiscriminately*” retained every report sent to it (§119). Various documents, including reports recovered from MI5, also cross-refer to other materials which existed but are not now available.

9.2 As a very general rule of thumb, the statistics set out at §6.1 above are consistent with

⁹ Similarly, the events referred to in the DLO T1 closing which the inquiry analyses in ch.6, §6 of its T1 interim report were simply examples of successful large-scale public order policing operations - again, from a 14 year period involving thousands of public order events which resulted in two deaths, hundreds of injuries to members of the public and police officers, and thousands of arrests (DL T1P1 opening, §§5.3.19-5.3.28).

each bi-weekly safe flat meeting having resulted in the production of roughly one intelligence report per undercover officer in attendance (104 meetings per year and each officer likely to miss at least 12 due to leave and other commitments).

9.3 This broadly tallies with the evidence of the T2 DL undercover officers pointing to gaps in the recovered reports attributed to them. Those with a total number of reports significantly lower than the total number of safe flat meetings they would have attended are HN25, HN33, HN53, HN56, HN65, HN72, HN83, HN87, HN88 and HN97. The short-fall is particularly acute for HN56 (unsuccessful deployment) and (less explicably) HN53, HN65, HN72 and HN83.¹⁰

9.4 Furthermore, there is a manifest absence of connected materials of the following kind which undoubtedly did exist:

- (1) notes of telephone communications - for a rare exception see MPS-0744276 and MPS-0744274 from August 1990 showing a telephone request for information coming into MPSB and being referred to and answered by the SDS;
- (2) MPSB covering minute sheets;
- (3) MPSB threat assessments;
- (4) Public Order Branch operational orders and plans, briefs and debriefs;
- (5) MI5 telexes and written requests for information, as cross-referred to in numerous intelligence reports;
- (6) MI5 consumer comment forms (available for a handful of cases only).

9.5 Numerous other meetings and discussions within or involving the SDS were either not

¹⁰ It may be noted that HN53 and HN72 were both provided with particularly early r.9 requests, possibly prior to the inquiry's full recovery, collation and assessment of intelligence reports from MI5.

documented or, if notes were taken, they were not retained, have been destroyed or have not been recovered, e.g.: meetings and discussions with or between the MPSB Squads and MI5 about intelligence requirements, targeting and tasking; safe flat meetings and one-to-one meetings with undercover officers; and MI5 debriefs of undercover officers. This is likely to have been a result of several factors (see DL T1P1 opening, pt 6.3).

10. Missing or delayed evidence

- 10.1 Evidence could and should have been, and should now be, taken not just from the recipients of threat assessments - who can speak to their value - but also the MPSB Squad desk officers who compiled them - who can speak to their basis. While the inquiry does intend to take evidence from more senior MPSB personnel above the SDS during T2, it does not plan to do so until after T3. Many of these individuals are already elderly and in failing health and, in any event, they will not be able to speak directly to the conduct of the threat assessment process.
- 10.2 Bearing in mind that the threat assessors were members of the MPSB Squads primarily responsible for setting SDS intelligence requirements, the inquiry should have attempted, and should now attempt, to find out how they did their jobs:
- (1) to what extent did they refer to MPSB Registry Files and to what extent were these made up of SDS intelligence?
 - (2) to what extent did they rely on their own knowledge-base and to what extent was this derived from SDS intelligence?
 - (3) to what extent did they put questions or requests to or check things with the SDS?
 - (4) how useful would the Registry Files have been without the information provided by the SDS?
- 10.3 Evidence about the following would also shed light on the nature of the intelligence collected by the SDS and the reasons for its collection:

- (1) MPSB enquiries and the purpose, use and operation of the MPSB Registry;
- (2) the MPSB / MI5 vetting system;
- (3) the general use by MPSB and MI5 of civilian covert human intelligence sources and the information needed to identify and recruit suitable individuals, referred to by MI5 as “*talent spotting*”;
- (4) the cost and impact of covert intelligence gathering by other means including interception, technical surveillance and civilian covert human intelligence sources;
- (5) the likely consequences of public order policing having been conducted without the benefit of SDS intelligence in terms of disorder, injuries, loss, damage and the wider impacts on, e.g. police tactics and equipment, other policing, police recruitment and retention and society more generally.

11. Home Office funding

- 11.1 The r.9 questions set out in the written evidence of the T1 Home Office witnesses and the T1 interim report suggest some confusion about the role of government ministers and officials and the difference between the authorisation and provision of funds, on the one hand, and the authorisation of operations, on the other. This was adopted in the T1 interim report with the following statement, “*The SDS required annual authorisation and funding by the Home Office*” (ch.6, §27). However, Home Office officials and ministers had no power to direct the “*closure*” of the SDS.
- 11.2 The Home Secretary had responsibility for police legislation, policy and finances, was the police authority for the MPS, set the functions of MI5 and the special branches and exercised residual prerogative powers in connection with public order (DL T1P1 opening, pt 2; *R v Home Secretary, ex p Northumbria Police Authority* [1989] 1 QB 26 (CA)).
- 11.3 However, the MPS was operationally independent of its police authority and government, it did not need the authority or approval of either to conduct undercover

operations or establish an undercover unit and neither had any power to direct that it refrain from or cease doing so. See *R. v Commissioner of Police of the Metropolis, ex p Blackburn (No.1)* [1968] 2 QB 118 (CA), per Lord Denning MR at pp.135F-136C:

The office of Commissioner of Police within the Metropolis dates back to 1829 when Sir Robert Peel introduced his disciplined force. The commissioner was a justice of the peace specially appointed to administer the police force in the metropolis. His constitutional status has never been defined either by statute or by the courts. It was considered by the Royal Commission on the Police in their Report in 1962 (Cmnd. 1728). But I have no hesitation in holding that, like every constable in the land, he should be, and is, independent of the executive. He is not subject to the orders of the Secretary of State, save that under the Police Act, 1964, the Secretary of State can call upon him to give a report, or to retire in the interests of efficiency. I hold it to be the duty of the Commissioner of Police of the Metropolis, as it is of every chief constable, to enforce the law of the land. He must take steps so to post his men that crimes may be detected; and that honest citizens may go about their affairs in peace. He must decide whether or no suspected persons are to be prosecuted; and, if need be, bring the prosecution or see that it is brought. But in all these things he is not the servant of anyone, save of the law itself. No Minister of the Crown can tell him that he must, or must not, keep observation on this place or that; or that he must, or must not, prosecute this man or that one. Nor can any police authority tell him so. The responsibility for law enforcement lies on him. He is answerable to the law and to the law alone.

11.4 In *ex p Northumbria Police Authority*, it was held that: the general scheme of the Police Act 1964 - in force during T1 and T2 - divided “*the respective functions for providing an efficient force into three: an authority to maintain, provide and equip; a chief constable to control and operate; and a Secretary of State to supervise and regulate*” (per Croom-Johnson LJ at p.41B) and neither police authorities nor the Home Secretary had any power to dictate or direct the conduct of Chief Constables or their officers (per Purchase LJ at pp.48E and 50B). The above quotation from Lord Denning was recited and further supplemented by Purchas LJ at p.46G-H:

In carrying out these duties, the powers of the chief constables must stem from delegated power to exercise the prerogative power to keep the peace. The duty to do this is confirmed in section 5(1) of the Act. How he disposes of the personnel available to him or what use he may make of any particular equipment in any given set of circumstances has not been altered by the Act.

11.5 See also Warne, §22:

It is important to understand that, although the Home Office maintained a close relationship with the police in order to ensure the Home Secretary could fulfil their functions, the police remained operationally independent from the Home

Office; and so I would not consider it to be accurate to say that the Home Secretary 'directed' or 'superintended' the Metropolitan Police.

- 11.6 The MPS established the SDS and its expenditure on related salaries and overtime was covered by the normal accounting process under the MPS Receiver throughout T1 and T2 and its additional expenditure on accommodation etc was initially seen as a matter to be dealt with in the same way (MPS-0730219/2-3).
- 11.7 The origin of the practice followed from 1969-89 whereby authorisation for the payment of additional SDS expenses for accommodation and transport was separately sought from and given by the Home Office on an annual basis is obscure, but it did not reflect any “*requirement*” that the Home Office authorise or approve the existence or operation of the unit: Commander Smith’s minute to AC Brodie dated 9 November 1968 said, “*You may also consider that this project might well be laid before the ‘Waddell Committee’ to receive Home Office backing on the financial side*”; and Commissioner Waldron’s minute to AC Brodie dated 13 November 1968 said, “*Will you please clear with the Receiver? Perhaps you and I should have a talk with Home Office*” (MPS-0730219/2-3).
- 11.8 It is apparent that various discussions involving the MPS Receiver, MPSB and the Home Office took place in November / December 1968 and the aforementioned practice emerged, albeit that AC Brodie’s letter to James Waddell dated 13 December 1968 appears to be unavailable (MPS-0730219/3-6; MPS-0724116; MPS-0724117; MPS-0724118). While it is true that some of the annual correspondence does contain language consistent with a more fundamental and existential authorisation and approval exercise, there was no legal basis for this. Furthermore, Home Office officials evidently saw themselves as engaged in an accounting process in connection with two discrete budget line items in its capacity as police authority, rather than a substantive assessment of undercover methods:
- (1) The annual MPS authorisation requests were brief and formulaic and did not spend time “*making a case*” for the retention of the SDS. When they did descend to particulars, this tended to be in relation to matters that might have been of interest to the Home Office, e.g. security for the Prime Minister (letter dated 11

February 1983) and publicity stunts at the Royal Wedding and Windsor Castle (letter dated 2 February 1987).

- (2) Phillips, §107 simply said, “*All I recall was that my predecessor and immediate superior had taken the view that our role was to support the MPSB and I authorised continued funding accordingly*”.
- (3) When the annual authorisation process was discontinued in June 1989 this was on the basis that the Home Office did not “*need any longer to know automatically of the resource and management aspects*” (MPS-0730603).¹¹

11.9 The meaning of the “*Waddell Committee*” and government accounting rules were not explored with the Home Office witnesses, but Stephen Taylor reported speculation that the separate authorisation process in respect of SDS expenses may have been instituted to maximise secrecy and/or reflected the fact that the MPS received additional funding to cover work of national significance connected with London’s status as capital city.¹² This fits with the fact that expenditure on private residential flats and vehicles would have been a new and unconventional item: “*The letters of approval seem to suggest that a factor having particular risks of embarrassment in the event of disclosure was the nature of the accommodation being provided for officers engaged in these operations*” (Harrington, §62). It may also reflect the fact that the Police Act 1964 conferred powers on police authorities to provide and maintain buildings, structures and premises (s.4(3)) and vehicles, apparatus, clothing and other equipment (s.4(4)) - the two matters subjected to independent consideration.

12. SDS annual reports

12.1 Remarks by CTI about the SDS annual reports misunderstand their purpose. They did not represent a one-off annual opportunity for the unit to communicate with senior management or justify itself. Such communication took place on a daily basis. Rather, the reports took stock of the unit’s personnel, administration, welfare, supervision,

¹¹ *Ibid.*, §2.1.

¹² “Investigation into links between Special Demonstration Squad and Home Office” (January 2015), §§9.4-9.5.

accommodation, transport, finances and operations.

- 12.2 The annual reports did not cover specific problems or disciplinary issues (e.g. Scutt, Chitty or the arrest of undercover officers) because they did not need to. These were dealt with by way of separate processes and appropriately escalated to senior managers as and when they occurred. Consistently with this, the reports also did not single out particular officers for praise or propose commendations.
- 12.3 It is true that the SDS annual reports for 1982-91 included increasingly lengthy lists of groups which had been “*directly penetrated or indirectly / closely monitored*”, but these at least allowed the reader to understand the broad scope of the operation. Had more collateral / peripheral groups (e.g. justice campaigns) been excluded, this would no doubt be the subject of criticism. Furthermore, each report went on to review the main work of the SDS - referring to “*principal organisations*” or “*areas of responsibility*” - and made the focus of the operation abundantly clear.
- 12.4 In any event, the claim that the lists were an exercise in exaggeration conducted to ensure the unjustified continuation of the SDS is unsustainable. The reports themselves were not passed on to the Home Office in connection with the separate authorisation of expenditure on accommodation and transport and the lists were not repeated in the related correspondence. This is consistent with the fact that they were not seen as particularly important or part of the justification for or *raison d’être* of the unit. The lists continued to appear in the annual reports after the accounting process changed in 1986 and were then abandoned in 1991, presumably because it was recognised that they had become over-long and were not serving any purpose.
- 12.5 The inclusion in the *SDS Annual Report for 1986*, §§45-47 of a reference to SDS intelligence allowing the frustration of two publicity stunts at the Royal Wedding and Windsor Castle was insignificant and unsurprising. Insignificant, because the matter was included as a point of interest - which it was - and not a justification for the continued existence of the unit. Unsurprising because: police constables are officers of the Crown who take an oath to serve the King and keep His peace; the MPS was responsible for security at ceremonial events; MPSB was responsible for protecting the Royal family; and both stunts would have involved trespass and disruptive and

disorderly security breaches. SDS managers were rightly pleased at having been able to help frustrate them, albeit that it was for uniformed officers to decide whether or not to act on the intelligence.

- 12.6 The SDS annual reports were no different to those produced by all manner of organisations, e.g. it might be said that the inquiry's annual update notes talk positively about its work and achievements and avoid more difficult issues about progress. The important point is that the SDS annual reports were entirely consistent with and reflected the opinion of management and their customers, i.e. that the unit was producing valuable intelligence and doing good work.

13. Operation Herne notes

- 13.1 The inquiry's r.9 requests tend to refer to and quote notes made by officers from Operation Herne as if they were verbatim transcripts of formal interviews or approved and agreed witness statements. Although Operation Herne did conduct some formal interviews and take some formal statements, this was not true in many cases. A large number of the DL officers who engaged with Operation Herne have disputed the accuracy and completeness of its notes.

14. Perspective of DL officers

- 14.1 The inquiry's conclusion that the SDS would have been closed down during T1 if certain matters had been addressed is impossible to reconcile with the experience and understanding of most if not all of the DL officers given what was being said to them at the time by their MPSB colleagues and MI5 (T1 interim report, ch.6, §§20-28).
- 14.2 MI5 - the body with primacy in relation to and responsibility for counter-subversion - assessed that most of the groups targeted by the SDS were subversive and that they should be investigated, studied and monitored and lists of their members and sympathisers needed to be maintained in the interests of national security. MPSB was obliged to assist MI5 and provide it with intelligence and MI5 produced the "*Brief Guide to Subversion in the UK*" and provided mandatory training to MPSB officers on the subject (Witness Y, §136). More generally, MI5 was active in the same operational space as MPSB and the SDS: handling its own informants and asking the SDS to "*talent spot*" new ones; providing briefs and requesting and receiving debriefs and information

about individuals, premises, telephone numbers and people in photographs it had taken; gathering intelligence by other means including “*out of hours*” visits to target offices and homes. All of this would have been taken seriously by officers in the SDS and reassured them that their work was justified.

14.3 All of this raises a fundamental question not addressed by the inquiry: if SDS intelligence was not useful and valuable, why did so many of those working above and alongside it think and say that it was and keep requesting more?

14.4 Taking the grounds for closure of the SDS proposed in the T1 interim report (ch.6, §§20-28) in turn:

(1) The type of information collected by the unit about individuals was similar in nature to that collected by other parts of MPSB and by MI5 and its collection was plainly considered to be justified. The level of intrusion involved was also similar. Not only were the MPSB Squads and MI5 repeatedly expressing appreciation, gratitude and praise for the intelligence and requesting more, S Squad and MI5 were independently taking photographs of the same targets and asking SDS officers to identify them. Had the work of the SDS not been justified, the same would have been true of other MPSB and MI5 intelligence collection, the bulk of MI5’s counter-subversion work and the operation of the vetting system.

(2) Had the issue about trespass, which was only raised at the end of the T1, been considered at the time the SDS was operating, it would have been dismissed because it is misconceived (see the DL T1 closing, Annex A, pt 4). Were it not misconceived, it would follow that any and every police, military, MI5 or MI6 undercover officer, civilian covert human intelligence source, journalist or activist gaining entry to private premises by deception commits a trespass. Similarly, the issue about confidentiality, also only very recently raised and also misconceived (see the DL T1 closing, Annex A, pt 5), would (if correct) have applied to more police, security and intelligence bodies than just the SDS.

(3) The point about positions of responsibility was considered at the time and it was

felt that it did not create a difficulty for the SDS provided there was compliance with the law on *agent provocateur* and Home Office Circular 97/1969 “*Informants who take part in crime*” (not referred to in the T1 interim report).

- (4) In relation to the use of information about deceased children’s identities in the creation of undercover legends, the evidence was that those involved did not think any particular usage would become known *to the family in question*, not that the widely used and well-known practice would not become known. Furthermore, even if it had been concluded that the practice was in some way inappropriate, the answer would have been to reform it - as was done in the 1990s - rather than to close the unit.

15. Conclusion

- 15.1 In the T2 era, the DL officers and the SDS as a unit made a valuable contribution to the maintenance of public order and to assisting MI5. This was also the view of its customers at the time. This raises a question of importance for the inquiry to consider. If, contrary to the above, the appreciation, gratitude and praise of SDS customers was not deserved, why was it given, why were liaison relationships and/or the unit maintained, and why was further intelligence requested?
- 15.2 The inquiry clearly wishes to conduct a thorough investigation and make findings of fact about all matters within its terms of reference, but there is a mismatch between the breadth of those terms of reference and the resource and timing available. It is imperative that the remaining resources and time are used well. The DL team has made suggestions to assist the inquiry in these submissions and in correspondence and is willing to enter into further discussions. However, the inquiry faces a choice: acknowledge its limitations and the fact that it does not have an evidential basis to make

reliable findings about the justification for the SDS and what would have happened without it, or expand its methodology and focus to cover the matters identified.

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