Consultation Analysis - Interim Report:

The Future of the Undercover Policing Inquiry

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Campaigning in partnership with Police Spies Out of Lives, The Monitoring Group, the Blacklist Support Group and the Undercover Research Group

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Executive Summary

This report presents an analysis of 2,690 written responses submitted to the Home Office's public consultation on the future of the Undercover Policing Inquiry, which ran from 16 July 2026 to 20 September 2026.

The majority of the responses studied were in the form of a standard letter with some minor variations. In addition there were bespoke individual, legal and group submissions from major stakeholder cohorts. The standard template responses (including letters based on that template with minor variations) should be treated as evidence of support for the core demands. They have been excluded from the prevalence calculations and findings, which are based only on unique-voice submissions (identified as consisting of 63 submissions).

The methodology and limitations are set out at Part 2 and Appendix 7.1.

Respondents argued that the consultation was procedurally defective, detailing four key breaches of the Gunning Principles and the government’s own guidance (the Cabinet Office Consultation Principles):

1. The consultation was not launched while proposals were at a formative stage, (evidenced by a history of prior Home Office interference including mentions in 2023 of holding a consultation to ratify restrictions to the terms of reference);
2. insufficient background information was provided to enable informed responses, (evidenced by the Home Office consultation paper and a rejected FOI request);
3. the initial five-week window running over summer recess was inadequate, (apparently accepted by the Home Office as they subsequently extended the deadline 20 August to 20 September);
4. The forced-choice questionnaire was structured to support a predetermined preference, (again, the Home Office belatedly made some efforts to mitigate criticism, adding a “prefer not to say” option to the available answers so at least people were not forced to respond to questions they identified as rigged).

The evidence cited by respondents is recorded in this report. (Part 3.3.)
Respondents argued that the questionnaire failed to even ask whether the Inquiry should continue in its current form, instead the online survey framed key components of any statutory inquiry — fact-finding, disclosure, identifying miscarriages of justice, hearing from victims, accountability for those responsible — as trade-offs against "value for money," and

provided no mechanism to express support for the Inquiry continuing to fulfil its Terms of Reference. The report finds that the questionnaire's wording (Appendix 7.6) is consistent with the respondents' characterisation. (Part 3.1.)

Many respondents cited the shocking revelations of serious police malpractice, which Tranches 1-3 of the Inquiry has revealed, as a likely key motive for attempts by vested interests to undermine the Inquiry and seek a ‘cover up’ rather than to be held fully accountable. Respondents contested the Home Office's "time and money" narrative, and argued that the primary drivers of the Inquiry's duration and cost have been state obstruction, anonymity applications, and disclosure delays; that the £137 million figure is selective, because it omits the £62 million+ spent by the Metropolitan Police on its own legal representation[1]; that truncating the Inquiry now would squander the investment already made; and that to allow state bodies to delay an inquiry and then cite that delay as a reason to terminate it creates a moral hazard and a dangerous precedent. These are reported as positions respondents advanced, evidenced by their own words. (Part 3.2.)

Respondents identified a structural conflict of interest. Respondents argued that a department that is both sponsor of the Inquiry and a subject of investigation in Module 2(c) should not be the body proposing truncation and definitely not deciding whether the Inquiry continues. (Part 3.4.)

Respondents argued that the online survey discriminates against those most directly affected. Victims of the events being investigated by the Inquiry were not consulted about their needs before the consultation was published and found they were unable to express their views using the convenient online questionnaire format. The design of the consultation forced non-state Core Participants, legal representatives, and civil society to draft written submissions to express their views. This criticism was also made by the 2,627 respondents who signed the standard letter (Part 3.5.)

Respondents submitted that the work of the Inquiry to date has established wrongdoing that was not previously known. Respondents documented discoveries that the process has uncovered that had not been in the public domain before the Inquiry: the "rent book" forgery and embezzlement; new cases of deceitful sexual relationships that officers had denied on oath; the extensive protection of UCOs who had engaged in deceitful sexual relationships and other potentially criminal misconduct, rather than impose sanctions or prosecutions;

[1] The amount would now be higher as the £62 million figure comes from the MPS on 11th June 2024 in response to a Freedom of Information Act request number FOI-8602-24-0100-000

intelligence files kept on newborn children; internal documents showing deliberate interference with Articles 10 and 11 rights; and the revelation that individuals believed to be activists were undercover officers. The report finds that respondents attribute such disclosure to the Inquiry's statutory powers to compel evidence, not to voluntary police candour. (Part 4.1.)

Respondents argued that what remains to be examined is the most significant material, and that the alternatives cannot reach it. Respondents submitted that Tranche 4 — the NPOIU era, operating under RIPA 2000, the Human Rights Act 1998, and NUTAC training — and Tranche 5 — undercover operations in the context of criminal investigations — are the only phases testing the legislation that currently governs covert policing; and that recommendations for the future (Module 3) cannot be made without the factual findings from Tranches 4 and 5. Respondents further argued that miscarriages of justice in Tranche 4 cannot be uncovered by any of the alternatives on offer, because the CCRC and the CPS are dependent on police disclosure. (Part 4.2, Part 5.)

Respondents highlighted the fact that curtailing or substantially altering the structure of the Inquiry at this late stage would leave some victims without redress. The decision (taken many years ago) to take a chronological rather than a thematic or other approach to the investigation was largely arbitrary and means many Core Participants have yet to receive answers about the events that impacted them. Respondents argue that a decision that denies redress to some victims simply because it has taken too long to get to those events would be profoundly unfair.

Respondents rejected each of the consultation paper's proposed alternatives. Respondents rejected a narrower statutory inquiry as victim exclusion by another name (Part 5.1); a non-statutory review as lacking the Section 21 powers and Section 35 sanctions necessary to compel evidence (Part 5.2); voluntary disclosure to individuals as unworkable, given fifteen years of failed FOI and Subject Access Requests, inadequate to the collective character of the surveillance, and offering no mechanism to produce recommendations (Part 5.3); and proceeding to Module 3 in a factual vacuum as producing recommendations without evidence (Part 5.4).

Some respondents pointed to the record of prior non-statutory and internal investigations before the Inquiry was established, at least 18, according to the NPSCPs' group submission, and argued that none came close exposing the scale of the misconduct the Inquiry has since established (Part 5.2). It was also pointed out by some that the bodies expected to act on the

Inquiry's recommendations, including the College of Policing and HMICFRS, are waiting for findings the Inquiry has yet to make (Part 5.4).

What respondents asked for

Respondents advanced a single, coherent demand: that the Home Office withdraw the curtailment proposals and allow the Inquiry to complete its original Terms of Reference as a statutory inquiry under the Inquiries Act 2005, across Tranche 4, Tranche 5 and Module 3. (Part 6.1–6.3.)

They set out four requirements for how that completion must be delivered:

- **Leadership continuity** — a successor Chair appointed without delay, supported by a multi-disciplinary expert panel;
- **Enforced disclosure and candour** — clear, legally enforceable disclosure timetables for state parties, and disclosure of evidence to Core Participants based on the infiltrated groups, spaces and context, not merely individuals' names;
- **Trauma-informed engagement** — direct, respectful dialogue with affected survivors, replacing hostile administrative consultations;
- **Funded to completion** — the Inquiry resourced to finish the work already begun, with the cost of completing the remaining tranches made transparent. (Part 6.4.)

They further identified five outcomes that the consultation asked them to rank against one another, and which they refused to rank. Respondents submitted that the five are not alternatives but a sequence — all essential, each dependent on the one before it — and that the Inquiry must be allowed to deliver all five in full. (Part 6.5.)

Part 1 — Context: the Inquiry and the consultation

1.1 The Inquiry

The Undercover Policing Inquiry (UCPI) was announced in March 2014 by then Home Secretary Theresa May and formally established on 12 March 2015 under the Inquiries Act 2005. The Inquiry was set up following a series of devastating public revelations concerning covert political policing, including the exposure of National Public Order Intelligence Unit (NPOIU) officer Mark Kennedy in 2010, revelations of police surveillance targeting the family of murdered teenager Stephen Lawrence, police involvement in the illegal blacklisting of workers on political grounds, dozens of civilian women deceived into intimate sexual relationships by undercover officers using fake identities, and the theft of the identities of deceased children by police.

The Inquiry's Terms of Reference mandate it to investigate undercover police operations conducted by English and Welsh police forces since 1968[2]. The matters for investigation were divided into Modules and Modules 1 & 2 were divided into Tranches (these are set out in an appendix in Part 7.4)

The original Chair, Sir Christopher Pitchford, stepped down due to illness, in October 2017. Sir John Mitting was appointed Chair in his place. The first five years of the Inquiry were entirely procedural, dealing with applications for anonymity and restrictions and redaction protocols for processing the evidence. Substantive evidential hearings did not begin until November 2020. Processing of evidence and the hearings themselves were significantly complicated by COVID restrictions.

Responding to requests by the Home Office, the chair published an Interim Report in June 2023, based solely on Tranche 1 evidence. Evidential hearings for Tranche 2 took place in 2024, and live evidential hearings for Tranche 3 commenced in 2024 and extended through July 2026. In July 2025, Sir John Mitting announced his intention to retire after Tranche 3. He will publish another interim report (due in 2027). He has said he will not include recommendations.

This leaves Tranches 4 and 5 and all of Module 3 outstanding. Tranche 4 covers the National Public Order Intelligence Unit (NPOIU) deployments, management, and oversight (1999–2011). Tranche 5 deals with all other undercover policing activity, including by

[2] https://ucpi.org.uk/wp-content/uploads/2016/06/Terms-of-Reference.pdf

regional English and Welsh police forces (1968–present). This includes undercover deployments linked to criminal investigations rather than political intelligence gathering. Module 3 will be an examination of current undercover policing practices and recommendations for future legislation, policy, and operational governance.

Significant work has already been done on obtaining and processing evidence for the remaining Tranches but, for the most part, the process of disclosing relevant documents to victims and obtaining evidence from civilian witnesses is yet to begin.

1.2 The July 2026 consultation

On 16 July 2026—the exact day Parliament rose for summer recess, and in the middle of live Inquiry hearings—Home Secretary Shabana Mahmood issued a Written Ministerial Statement launching a public consultation titled *"Consultation on the Future of the Undercover Policing Inquiry"*. The consultation document noted that as of March 2026, the Inquiry had been in operation for eleven years and had incurred total expenditure of £137 million. Citing the anticipated retirement of Chair Sir John Mitting at the end of 2027 upon the completion of Tranches 1 to 3, the Home Office invited public and stakeholder views on options for addressing the Inquiry's remaining work beyond 2027.

The Home Office published an online survey questionnaire (See Appendix 7.6) hosted on a government portal. The consultation was initially scheduled to run for five weeks, closing on 20 August 2026.

1.3 History of prior interference

The context surrounding the consultation and how it was perceived by Core Participants was informed by official documents released under the Freedom of Information Act 2000, containing internal correspondence between the Home Office Sponsorship Unit and UCPI Chair Sir John Mitting (FOI 202404432 - see Appendix 7.5).

Those letters established that proposals to limit the Inquiry’s work, hold a public consultation and bring the Inquiry to an end at the end of 2026 had been raised by the Home Office as early as 13 October 2023, when former Home Secretary Suella Braverman wrote to Sir John Mitting proposing formal changes to the Inquiry’s Terms of Reference. Correspondence continued for a number of months (October 2023-January 2024) between Mitting and Braverman (and subsequently with her replacement, Home Secretary James Cleverly). The Home Office proposed introducing a "sampling approach" to the evidence, deleting the

requirement in the Terms of reference that the Inquiry examine the impact of operations upon individuals, imposing a budget cap, and setting a hard deadline for a final report no later than the end of 2026. The letters also refer to a meeting between Braverman and Mitting on 16 October 2023 at which "a potential public consultation" was discussed. The launching of a public consultation at the end of 2026 proposing to curtail the Inquiry therefore appears to be something the Home Office have been intending to do for some time.

Meanwhile, in an email dated December 2024, the Home Office told non-state Core Participants it would be "inappropriate" to meet with them to discuss the progress of the Inquiry because the Inquiry was supposed to be independent and the Home Office could not intervene.

1.4 How the consultation was received

The launch of the consultation in the middle of important, live evidential hearings in the Inquiry and the imposition of a very limited 5-week deadline was extremely disruptive for Core Participants. Solicitors representing the non-State Core Participant coordinating group wrote to the Home Office on 22 July 2026 raising a number of issues with the questionnaire and the consultation process and asking that the consultation be withdrawn[3] [4].

Following widespread protest from Core Participants and legal teams regarding the inadequately short timeframe over the summer holdiays, the Home Office extended the closing deadline to 23:59 on 20 September 2026. They also responded to criticism of the multiple-choice survey, with the addition of an option to respond "prefer not to say" to a number of questions. However, the structure of the survey questions and options for substantive answers remained the same. Civilian Core Participants in the Inquiry and others affected by the abuses the Inquiry is investigating therefore made the decision to boycott the online survey and to respond to the consultation in writing instead, setting out both their concerns about the structure of the consultation and their views about the future of the Undercover Policing Inquiry.

On October 14th and October 16th, the Home Office held four round-table meetings with non-state core participants. These meetings were called in response to the letters received by the consultation team and analysed in this report. The sessions were attended by approximately 45 non-state core participants as well as some of their recognized legal

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[3] https://campaignopposingpolicesurveillance.com/wp-content/uploads/2026/07/NSPCPs-RLRs-Letter-to-Home-Office-22-July-2026.pdf

[4] https://campaignopposingpolicesurveillance.com/wp-content/uploads/2026/07/PWKC-260721-Submissions.pdf

representatives (RLRs). The overwhelming consensus displayed in the consultation responses studied for this report was reaffirmed in those meetings, and participants have reported there was no divergence from the key message that the current Inquiry must continue in full.

Part 2 — Report purpose and methodology

The Campaign Opposing Police Surveillance was copied into 2,690 long-form consultation responses that were submitted to the Home Office between 16 July 2026 and 20 September 2026. They contain the voices of civilians affected by the work of the Inquiry, including those directly impacted by the abuses under investigation as well as wider members of the public. This report provides an analytical summary of those consultation responses.

This report has been produced in advance of the Home Office's official report on the consultation in light of concerns that while an online survey is easily quantifiable, multiple long-form letters are not. This report aims to reflect the prevalence and force of the responses made by thousands of people who responded to the Home Office consultation without filling in the online questionnaire. The purpose of this report is to provide an empirical account of what consultees submitted by coding complex, open-text responses into recurring themes.

This report summarises what those respondents said. Where it assesses that a position is well supported by the corpus, it says so and explains why. It does not adjudicate the legal or factual merits of respondents' positions. Identified limits to the methodology are set out in Part 2.4 and within the details of the methodology found in the Appendix 7.1.

2.1 The Responses

The dataset analyzed in this report comprises the complete set of written public consultation submissions forwarded to the Campaign Opposing Police Surveillance when sent to the Home Office between 16 July 2026 and 20 September 2026. An audit of the dataset established that 2,690 responses were made available in this way.

The corpus is structured into six distinct stakeholder tiers:

1. **Standard Signatories:** Core participants, affected individuals and members of the public used the online portal at ucpi.uk to formally endorse a unified position in the form of a standard letter (See Appendix 7.3).
2. **Personalized Narrative Submissions:** individual personalised responses submitted using the same online tool which adapted the standard letter text to include personal accounts or additional information.

3. **Bespoke Filings from Standalone Core Participants & Survivors:** Standalone submissions filed by affected individuals including non-state Core Participants, civilian witnesses, as well as other affected members of the public.
4. **Group Filings from Activist Cohorts & Networks:** Collective submissions filed on behalf of targeted social movements: Camp for Climate Action, the Ratcliffe-on-Soar defendants, Earth First! Network, Genetic Engineering Network (GEN), WOMBLES, Social Centre Networks, Reclaim the Streets (RTS) and others.
5. **Recognised Legal Representatives:** The coordinating group of non-state, non-police Core Participants in the Inquiry sent joint responses, including submissions made through Doughty Street Chambers on behalf of all Non-Police Non-State Core Participants (NPSCPs), and the submissions of Pete Weatherby KC.
6. **Filings from Monitoring or Campaigning groups:** Such as Police Spies Out of Lives (PSOOL), the Network for Police Monitoring (Netpol), the Undercover Research Group (URG), the Centre for Women's Justice (CWJ), the Public Interest Research Group (PIRG) Cymru, and the Hillsborough Justice Campaign (HJC).

2.2 Unique-voice responses

To ensure methodological accuracy, the analysis distinguishes between mass template endorsements and unique-voice narrative submissions:

- **The Standard Template Letters:** The 2,554 signatories to the standard letter represent a mass endorsement of a single, unified position. This group would represent over 90% of total respondents but we've removed them from the prevalence analysis to focus only on unique voices. However we note that many of those who signed and sent the standard response will have done so in lieu of writing their own detailed personal response. Their views must be acknowledged and the position set out in the letter carries enormous weight. That letter is reproduce in full in the appendices [See part 7.3].
- **Unique-Voice Responses:** 100 consultation responses submitted via ucpi.uk were found to deviate from the standard letter by more than 10% and of these we identified 27 substantively unique, personalized letters. Additionally we received 36 bespoke filings from CPs, legal teams, NGOs, and activist cohorts by email. Together, these provided a unique-voice corpus of 63 letters which were used for the qualitative analysis documents in Parts 3, 4, 5, and 6 of this report, and detail in the table in Appendix 7.2.

The methodology for segregating unique voices from the standard template corpus was automated using a python script which compared texts by calculating a similarity percentage. A second-pass tokenised the text to compare individual words. Responses that showed a very small divergence were categorised as essentially template letters. Those with a divergence above a higher threshold had more changes or additions, usually comprising an explanation of standing or interest. These ‘personalised’ letters were then further divided using the same methodology but an ever higher threshold in order to retain only those with much more substantive additions or omissions to the positions being expressed.

2.3 The method in brief

Within the limits of the time and resources available, the qualitative and quantitative analysis of the corpus was conducted in accordance with published standard practice. The analytical workflow involved three stages, the first two performed with the assistance of AI.

1. **Document Ingestion & Entity Mapping:** Full text extraction and attribution indexing across the available corpus.
2. **Thematic Coding & Prevalence Matrix:** Inductive thematic coding identifying core shared arguments across submissions. Each theme was mapped across the unique-voice corpus to establish quantitative prevalence percentages (see 7.2).
3. **Verbatim Quote Verification:** Block quotations selected to illustrate common themes were verified manually against the original sources to ensure attribution accuracy and contextual relevance, and consent was obtained from the quoted person or group. (It should therefore be noted that the quoted voices are taken from a subset of the unique-voice respondents who actively consented to us using their words in this report.)

2.4 Limitations in brief

The analytical findings of this report are subject to three identified limitations:

1. **Available data:** If the Home Office received any responses directly through their online survey portal, or written responses from other stakeholders that were not copied to the Campaign, those were not available to us and do not form part of this report. We have submitted a Freedom of Information Application to the Home Office requesting information about the extent and nature of other responses they received, however we have not yet received a reply and those responses are therefore not considered here.

2. **Thematic Coding & Prevalence Matrix:** While human checks confirm the majority prevalence of sentiment and common thematic positions across the corpus, no manual check has been made of the prevalence matrix provided in Appendix 7.2.
3. **Segregating Unique Voices:** By necessity, arbitrary thresholds were used to measure divergence within the mass corpus from the template letter offered as a starting point on the ucpi.uk portal. This will inevitably have meant that some unique voice elements were inadvertently excluded or a few non-unique voices may have remained to skew the prevalence matrix calculations.

Part 3 — Findings: the conduct and validity of the consultation

3.1 The questionnaire's framing

Analysis of the available consultation responses demonstrates a total, unanimous rejection of the online survey's framing and methodology. Respondents across all categories—non-state Core Participants, Recognised Legal Representatives, non-governmental organisations, activist cohorts, and individual members of the public—argued that the online questionnaire issued by the Home Office on 16 July 2026 was structurally biased, methodologically defective, and designed to produce a predetermined result in favour of curtailing or shutting down the Undercover Policing Inquiry.

Respondents across all cohorts criticised the fact that the text of the online survey itself (Appendix 7.6) contains no option, in the multiple-choice grid or structured fields, for respondents to express support for the Inquiry continuing under its original Terms of Reference to full statutory completion across Tranches 4, 5 and Module 3. "Alison", a Category H[5] Core Participant, put the point directly to the Home Office:

> *"My favoured option – which is to complete the Inquiry as it was originally scoped – does not appear in this consultation. Why not?"*
> **— "Alison" (Category H Core Participant, 26 August 2026)**

Respondents also pointed to the structure of the survey as evidence of a predetermined result. Question 4 asked respondents to rate the "relative importance" of Tranche 4, Tranche 5 and Module 3 on a 1-to-5 scale. Question 5 asked respondents to similarly rate seven specified outcomes on a 1-to-5 scale, explicitly juxtaposing statutory duties—such as "establishing findings of fact", "disclosure of relevant documentation to victims", and "public accountability"—against fiscal and temporal constraints ("delivering public value for money by prioritising concluding the Inquiry" and "delivery of timely conclusions by prioritising concluding the Inquiry"). Question 6 invited respondents to rate alternative, non-statutory options "if the Inquiry does not continue in its current form".

Respondents argued that this design created a false dichotomy, treating core operational duties for any Inquiry as negotiable commodities to be weighed against administrative cost and duration. "Tina", another Category H Core Participant, deceived into a sexual

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[5] Category H refers to those Core Participants who are women deceived into sexual relationships by undercover officers

relationship by an officer in the National Public Order Intelligence Unit which falls to be investigated in Tranche 4, articulated the objection:

> *"I am not responding via your online questionnaire. I am sure you are well aware by now that your questionnaire is unusable and should be scrapped. Asking victims of state-sanctioned abuse to score statutory truth-seeking and human rights accountability against financial 'value for money' on a numerical scale is morally indefensible. Establishing facts and ensuring public accountability for severe state wrongdoing are statutory duties under the Inquiries Act 2005. I reject the survey's forced-choice framing entirely, and I set out my position directly in this letter."*
> **— "Tina" (Category H / Tranche 4 Core Participant, September 2026)**

A third constraint was identified in the joint submission from Police Spies Out of Lives and Category H Core Participants: the survey's only free-text field was capped at 300 words, for an Inquiry that has run for over a decade and cost £137 million.

> *"The only space in the survey for anything outside a 1–5 rating is capped at 300 words. This is a ten-year inquiry that has cost £137 million and has heard evidence of women deceived into long-term relationships by officers who used dead children's identities, described in terms including state-sanctioned abuse. Two tranches covering thirteen years of undercover deployments have not yet been examined at all. A 300-word box is totally inadequate."*
> **— Police Spies Out of Lives (September 2026)**

The 2,627 signatories to the standard campaign letter (including personalised versions of that letter) (see Appendix 7.3) all endorsed this critique, supporting the finding that the choice not to use the online questionnaire was an intentional, unified rejection of an instrument respondents characterised as methodologically rigged.

3.2 Deconstructing the "Time and Money" Narrative

Across the consultation corpus, respondents advanced a four-part rebuttal of the Home Office's foundational justification for the consultation: the narrative that the Inquiry has taken too long and cost too much, and must therefore be curtailed or restructured in the interest of "public value for money." Respondents submitted that this narrative is factually inaccurate, methodologically selective, and procedurally perverse. They further submitted that the

delays and high costs of the Inquiry are overwhelmingly state-manufactured, and that terminating the process now would squander sunk costs while rewarding state obstruction.

First, respondents argued that the primary driver of delay and cost has been state obstruction. Submissions across all non-state cohorts submitted that the Inquiry's eleven-year duration and the majority of the costs to the taxpayer — once uncounted state legal expenditure is included — has been substantially attributable to systematic obstruction, relentless anonymity applications, and chronic disclosure delays caused by state bodies. Respondents highlighted that during the Inquiry's first five years (2015–2020), state core participants engaged in exhaustive secrecy litigation, demanding blanket anonymity for hundreds of former undercover officers and managers, challenging disclosure protocols, and forcing dozens of closed interlocutory hearings before a single line of evidential testimony could be taken in public. Alan Watson, on behalf of PIRG Cymru, put the point directly:

> *"It seems clear that these police applications for blanket anonymity, protracted restriction order hearings, and chronic disclosure delays, have not only caused inordinate delay but are responsible for a significant proportion of the total costs. Halting the Inquiry would effectively reward this institutional recalcitrance, while penalising the victims."*
> **— Alan Watson (on behalf of PIRG Cymru, September 2026)**

Others pointed out that the Home Office has provided no evidence to support its claims about "value for money":

> *"This page does not give enough evidence to make a proper judgement on these questions - and is obviously looking for a swift and cheaper conclusion which would vitiate the inquiry held to date and likely waste the money already invested. "*
> **— Duncan Law (Individual Consultation Respondent, August 2026)**

> *"...we are implicitly told that 'value for money' can only be achieved by 'prioritising concluding the inquiry,' with no figures provided on cost to date, cost to complete, or how much already-spent money would be wasted if Tranches 4 and 5 were curtailed, and no explanation offered as to why the Inquiry has taken as long and cost as much as it has – above all the repeated anonymity applications, closed proceedings and judicial reviews brought by state core participants, which have driven the delay now being cited against the Inquiry*

continuing."

— Beth Stratford (Core Participant, 20 September 2026)

Submissions highlighted that the Home Office's £137 million figure is a selective accounting metric. It highlights the Inquiry's administrative running costs while concealing the expenditure incurred by state bodies in resisting disclosure, and it presents as a neutral cost of the process what respondents described as the cost of obstruction.

> *"The primary drivers of both delays and costs are the state and police core participants, who have systematically obstructed progress through endless, document-by-document anonymity applications, closed hearings, and excessive redactions... Additionally, the state's cited cost figures omit the estimated £62 million+ spent by the Metropolitan Police Service on its own legal representation as an active participant."*
>
> **— Debbie Vincent (Non-state Core Participant, 10 September 2026)**

The joint letter from the Non-Police Non-State Core Participants and their Recognised Legal Representatives, filed six days after the consultation launched, identified one specific instance of that obstruction and its consequences:

> *"The NPSCPs note that much of the cost and delay incurred by this Inquiry is a consequence of the excessive levels of secrecy demanded by the state (and police) in the Inquiry... There is an additional concern that the recent confirmation from the National Police Chiefs' Council (NPCC) that they will no longer coordinate the privacy redaction process has sabotaged the Inquiry processes... Any change to the current format of the Inquiry as a result of the delays that this has created will incentivise more state obfuscation and delay and encourage a further drive for secrecy and lack of transparency."*
>
> **— Non-Police Non-State Core Participants and Recognised Legal Representatives (22 July 2026)**

Kate Wilson pointed to an excessively costly and cumbersome redaction process:

> *"The redactions process involves eight or nine different state agencies checking every document before disclosure or publication, and incurs significant hidden, additional costs to the taxpayer that are not included in the £137 million figure*

the Home Office cites."
— Kate Wilson (Core Participant, September 2026)

Respondents argued that allowing state bodies to delay an inquiry and then citing that delay as a reason to terminate it would create a moral hazard and a dangerous constitutional precedent. Both the police service and the Home Office are subjects of investigation within the Inquiry's Terms of Reference, and permitting a state sponsor to weaponise time and cost metrics to curtail an inquiry into its own historical failures would constitute a gross conflict of interest. Debbie Vincent put the precedent point directly:

"To reward state obstruction by closing the Inquiry prematurely would establish a dangerous precedent: that state bodies can escape accountability simply by making an investigation too slow and expensive to complete."
— Debbie Vincent (10 September 2026)

Gerrah Selby framed the concern in terms of institutional learning:

"The Inquiry has taken longer than expected because the police have repeatedly sought anonymity and protective measures, contested disclosure and otherwise placed obstacles in the path of establishing the truth. I am deeply concerned that bringing the Inquiry to a premature conclusion would effectively reward this conduct. If an institution can delay scrutiny for years and then rely upon the passage of time, cost and exhaustion as reasons to terminate that scrutiny, there is a serious risk that future institutions will learn the wrong lesson from this process."
— Gerrah Selby (Core Participant, September 2026)

Emily Apple characterised the effect as a victory for the bodies that had opposed the Inquiry:

"Throughout the last 11 years, and indeed since the first public revelations of abuse committed by undercover officers, the police have taken every opportunity to try to undermine those seeking the truth and to derail the inquiry. If the terms of reference were curtailed now, it would be a victory for the bodies that never wanted it to happen in the first place, and would reward their years of deliberate filibustering that continues to this day."
— Emily Apple (Core Participant, 20 September 2026)

3.3 Consultation Shortcomings

Respondents across the corpus submitted detailed legal arguments asserting that the Home Office consultation was unlawful on the basis that it breached all four limbs of the established common law standards for public consultation (the Gunning principles, as affirmed in *R (Moseley) v Haringey LBC* [2014] UKSC 56) as well as the Cabinet Office Consultation Principles 2018.

The four limbs of the Gunning principles require that:

- consultation must take place when proposals are still at a formative stage;
- the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response;
- adequate time must be given for consideration and response; and
- the product of consultation must be conscientiously taken into account when finalising any proposal.

Limb 1: Proposals at a Formative Stage

Respondents argued that the consultation breached Limb 1 because official documents released under Freedom of Information requests (FOI 2024/04432; see 1.3 and 7.5) show that decisions to curtail the Inquiry and accelerate its timeline were taken by Ministers as early as late 2023, before the public or Core Participants were consulted.

Non-state Core Participant Kate Wilson cited the FOI disclosure to establish that the consultation was an administrative formality designed to ratify decisions already taken:

> *"... unbeknown to us, the Home Office had in fact already been seeking to interfere in the Inquiry process for more than a year. Following the announcement of this consultation, I went back and re-read the response to FOI 2024_0443, which reveals previously secret correspondence between the Home Office and the Inquiry, going back to 2023 through which the Home Office has been seeking to limit the Inquiry's terms of reference, set a cap on funding and bring it to and end by the end of 2026. It appears the Home Office is now using Mitting's retirement to bring about the de facto implementation of all the changes it previously sought, by simply failing to appoint a new Chair. Even this 'public consultation' was part of that plan as it was mooted in those letters back in 2023."*
>
> **— Kate Wilson (Core Participant, 9 September 2026)**

Several Respondents also pointed to the design of the consultation itself as an indication that this was not a genuine consultation at a formative stage but rather an attempt to lend legitimacy to an unpopular decision the Home Office wishes to make.

> *"The current consultation is also extremely limited in scope and the way the questions are formulated is inherently flawed. There is a clear impression that the Sponsor Department is merely seeking validation for a decision that has already been taken."*
> **— Non-Police Non-State Core Participants & Recognised Legal Representatives (NSPCPs Group / Kellys Solicitors)**

Limb 2: Sufficient Information for Intelligent Consideration

Respondents argued that Limb 2 was breached because the Home Office failed to provide basic operational data, financial breakdowns, or impact assessments necessary to evaluate the proposed alternatives. While the consultation paper cited an aggregate expenditure figure of £137 million, it provided no disaggregated data, it failed to include costs attributable to state and police legal representation that are being paid by other state bodies (such as the Metropolitan Police or the Mayor's Office for Policing and Crime (MOPAC)) but are still ultimately being funded by the tax payer, and it included no estimate of the cost to complete the remaining tranches, and no calculation of the public funds already spent on those Tranches that would be squandered if they were abandoned.

Furthermore, PIRG Cymru submitted evidence that when it submitted a formal Freedom of Information request (FOI2026/10668) on 5 August 2026 seeking the underlying cost and timetable estimates and option appraisals, the Home Office Consultation Team delayed its statutory response until after the consultation closing deadline. Alan Watson, on behalf of PIRG Cymru, noted:

> *"Actively withholding this foundational evidence until after the consultation closes constitutes a clear breach of the Gunning Principle requiring public bodies to provide sufficient background information to permit an informed response, rendering the process vulnerable to Judicial Review."*
> **— Alan Watson (on behalf of PIRG Cymru, 20 September 2026)**

Limb 3: Adequate Time for Consideration and Response

Respondents submitted that Limb 3 was breached because launching an initial five-week consultation during the Summer holiday failed to allow adequate time or provide appropriate mitigation (as required by Cabinet Office Consultation Principle 7 for consultations spanning holiday periods). The timing forced survivors and Recognised Legal Representatives to divert scarce time and resources away from live Inquiry proceedings during a high-pressure phase of Tranche 3 evidential hearings and closing submission deadlines.

Kirsten Heaven of Doughty Street Chambers, on behalf of the Non-Police, Non-State Core Participants' Co-ordinated Group, raised concerns about the timing of the consultation and its short deadline:

> *"The consultation was published during the Tranche 3 hearings and was due to last only 5 weeks (and during the summer holiday period) concluding on 20 August 2026, when Parliament was in recess. The deadline was extended but only marginally to 20 September 2026."*
> **— Kirsten Heaven, Doughty Street Chambers (September 2026)**

Ben Leamy, a Tranche 3 and 4 Core Participant, detailed the disruptive operational impact of this timing:

> *"The consultation period also spanned the summer holiday, with all the legal teams taking much-needed time off before returning to work on rule 10 questions for final tranche 3 hearings and to prepare closing statements due in October. The timing could not have been more inappropriate or insensitive, forcing CPs and our RLRs to divert time and resources towards responding to the consultation and away from the Inquiry or much needed time off. The decision to launch the consultation during this period suggests either a shocking level of ignorance about the Inquiry's work, or a deliberate attempt to disrupt and demoralise during this critical period, either being entirely unacceptable."*
> **— Ben Leamy (Tranche 3 & 4 Core Participant, 7 September 2026)**

Limb 4: Conscientious Consideration

Respondents argued that Limb 4 was severely compromised by the design of the consultation process. Because the online questionnaire omitted any option to support completing the Inquiry under its original Terms of Reference, the quantitative data presented to Ministers would inevitably distort consultees' views—reading blank entries or "prefer not to say" responses as indifference rather than active opposition. The absence of any published methodology for coding and analysing the substantial body of written responses submitted outside the portal compounded the problem.

In their joint submission, Police Spies Out of Lives and Category H Core Participants set out how the survey design prevents conscientious consideration of consultees' true positions:

> *"A survey that excludes the actual position of a significant part of its target audience cannot produce data the Home Office can honestly describe as representative of Core Participants' views. If Core Participants respond 'prefer not to say' or leave the rating questions blank because none of the available answers reflect their position, any subsequent analysis that reads those responses as indifference, or as an absence of strong feeling on the future of the Inquiry, will misstate the reality of Core Participants' views. We are stating this in writing now so that it cannot be a surprise later: this submission's position is not 'prefer not to say.' It is a substantive answer that the form does not have space for."*
> **— Police Spies Out of Lives (September 2026)**

Alan Watson, on behalf of PIRG Cymru, challenged the lack of transparency regarding how non-portal submissions would be processed and presented to decision-makers:

> *"Please also confirm how responses submitted outside the questionnaire will be counted, coded and analysed; how support for completing the existing Terms of Reference will be recorded; and how objections to the questionnaire's framing will be reflected in the published consultation report. These questions should be answered as part of the consultation process because they affect effective participation and scrutiny... A separate request under the Freedom of Information Act may be appropriate for any recorded methodology or internal instructions that are not published, but it should not substitute for clear*

> *assurance now about the treatment of this submission."*
> **— Alan Watson (on behalf of PIRG Cymru, September 2026)**

Synthesising these procedural breaches, collective campaign cohorts submitted that the consultation process as a whole was fatally compromised and must be set aside. The Reclaim the Streets cohort concluded:

> *"The Home Office must immediately withdraw all options proposing to alter, narrow, or truncate the Inquiry's original Terms of Reference. The Inquiry must remain statutory and be fully funded to complete Tranches 4 and 5, and Module 3, under the strict powers of the Inquiries Act 2005. We refuse to let our unexamined Tranche 4 evidence be discarded to satisfy a pre-negotiated £139.1 million budget cap."*
> **— Reclaim the Streets Cohort (September 2026)**

This position was uncompromisingly supported by responses from legal professionals, with Pete Weatherby KC emphasising:

> *“The consultation is misconceived and it is incapable of leading to a better outcome. It should be withdrawn."*
> **— Pete Weatherby KC (20 July 2026)**

3.4 The Home Office's conflict of interest

A central finding across the corpus is that respondents identified a profound, structural conflict of interest in the Home Office's role as the arbiter of the consultation. Respondents emphasised that the Home Office is not a neutral administrative overseer; rather, it is a primary state party under active statutory investigation in Module 2(c) of the Inquiry, which is tasked with examining historical Home Office knowledge, authorisation, and management of covert political policing units. Respondents argued that allowing a state department whose own historical culpability remains unexamined to alter the scope, funding, or duration of the Inquiry investigating it constitutes a breach of basic principles of natural justice.

Roger Geffen sets out why the conflict matters as the Inquiry approaches the present day:

> *"The Home Office needs to acknowledge that it is itself under investigation, as are past Home Secretaries and Home Office ministers. As the inquiry gets*

closer to the present day, it becomes all the more important that the Home Office itself does not come under suspicion of wanting the inquiry curtailed because it has things to hide. Nor should it allow other vested interests to avoid accountability."

— Roger Geffen (T3 & T4 Core Participant, September 2026)

3.5 Non-representativeness of the online survey

With almost 2,700 respondents actively boycotting the Home Office online questionnaire in favor of detailed written filings, any statistical aggregation of the online survey data will reflect an unrepresentative sample that excludes the primary victims and active participants of the Inquiry. Core Participant “Lindsey” was one respondent to raise this concern:

"The design of the questionnaire itself constitutes a significant procedural unfairness, and I do not believe it can be relied upon to produce a fair or representative picture of public and core participant opinion."

— **"Lindsey" (Category H Core Participant, 27 August 2026)**

A physical manifestation of the lack of trust in the Home Office and the boycott of the online questionnaire occurred on Friday, 18 September 2026, when a delegation of non-state Core Participants attended Home Office headquarters to hand-deliver paper copies of more than 2,600 written consultation responses. Subsequent submissions documented a severe breakdown in administrative courtesy and trauma-informed protocol during this event. In her consultation filing, Core Participant Emily Apple detailed the events surrounding the delivery:

"Finally in terms of context, it is utterly disgusting that when a small group of us went to the Home Office on Friday 18th September to hand deliver over 2600 responses to your consultation, no-one from the Home Office was prepared to meet us to receive the submissions, despite us contacting you in advance and agreeing this. When three of us attempted to leave them in reception, the response was to assault core participants, lock-down the Home Office and call the police. Your press officer lied to us, telling us that a representative would meet us, and then separately emailing security to say they had no intention of meeting us... This lack of respect for survivors who've spent years of voluntary time engaging with a public inquiry shows the contempt your office has for core participants."

— **Emily Apple (Core Participant, 20 September 2026)**

This account was corroborated by individual Core Participant C Wilson, who noted in her letter:

> *"A small group of Core Participants turned up to hand-deliver people's responses to this consultation. Despite us letting you know in advance that we were coming, and phoning the press office when we arrived, and being told that someone would come to the door to take delivery, that group was left waiting outside for a very long time (well over an hour). It appears that somebody instructed the security guards not to allow the group inside, to leave the package of letters at reception, and somebody went to the extraordinary length of calling the police and telling them the building was 'under attack'."*
> — **C Wilson (Core Participant, September 2026)**

Part 4 — Findings: the importance of the Inquiry

4.1 What the Inquiry Has Already Established

Across the consultation corpus, respondents submitted that the Undercover Policing Inquiry (UCPI) has exposed a scale, depth, and systemic pattern of state wrongdoing that was previously unknown and unsuspected prior to the statutory process. Respondents argued that because secret political policing units operated in conditions of total opacity—shielded by the principle of *"Neither Confirm Nor Deny"* (NCND), official secrecy, and corporate police resistance—none of the major discoveries concerning state misconduct emerged through voluntary police candour or internal reviews. Instead, respondents submitted that this evidence surfaced solely because the Inquiry exercised its compulsory statutory powers under the Inquiries Act 2005 to force the production of contemporary police archives, disclose those records to non-state Core Participants (CPs), and subject police officers and managers to live oral cross-examination under oath.

Submissions across all respondent cohorts—including legal representatives, non-governmental organizations (NGOs), activist groups, and individual Core Participants—catalogued the discovery of specific incidents that were not in the public domain prior to the Inquiry's evidence hearings.

In his formal submission to the consultation, Core Participant Ben Leamy detailed how statutory disclosure in Tranche 3 revealed an unsuspected breadth of state surveillance and active police corruption, including the fabrication of intelligence:

> *"The disclosure I received in T3 revealed that the extent of the reporting, and the impact of undercover policing on my life, extended considerably beyond the two incidents I was aware of, where the involvement of undercover officers in court processes had not been disclosed... Disclosure I received in T3 included shocking and entirely untrue allegations of serious criminality recorded about me in police files and retained for more than 20 years without corroboration."*
> — **Ben Leamy (Tranche 3 & 4 Core Participant, 7 September 2026)**

This finding, that statutory disclosure to civilian witnesses was an indispensable catalyst for uncovering police illegality, was reinforced in the joint representation submitted by Police Spies Out of Lives (PSOOL) on behalf of female Category H Core Participants. Their submission emphasized that state witnesses routinely denied their own misconduct or any knowledge of misconduct by other officers, in sworn witness statements, only for those

denials to be demolished when civilian participants cross-referenced police records against their own personal archives:

> *"One key lesson is that the scope of the abuse uncovered by the evidence goes far beyond what anyone knew or expected at the outset, and that few or none of those discoveries resulted from state witnesses candidly volunteering the truth. On the contrary, it was only through disclosure of contemporary documents to civilian witnesses and hearing our evidence, that the full extent of the wrongdoing became apparent. Examples of this include... New cases of deceitful sexual relationships that were denied by the officers, (such as HN60, who signed a witness statement declaring that he had no such relationship but is now due to give evidence on 21 September about a relationship uncovered by non state core participants)... Evidence of forgery and embezzlement by undercover officer Carlo Soracchi and his managers in the fake 'rent book' that, had it not been disclosed to Donna McLean, might easily have been mistaken for a mundane accounting document... Written evidence of management awareness of deceitful sexual relationships that undermines their 'memory loss' and denials."*
>
> — **Police Spies Out of Lives / Category H (September 2026)**

Submissions provided granular evidence of systemic state practices that extended far beyond political activists to target infants and peripheral family members. In her consultation response, Core Participant Emily Apple described how of disclosure revealed that Special Branch had opened a police intelligence file on her newborn child within days of his birth—a practice of targeting children that was completely unknown to participants prior to the Inquiry:

> *"One of the most disturbing parts of my disclosure was the reporting on my baby. I was already aware that HN3 knew my child, and one of my exhibits was a photograph of the polar bear cuddly toy that he gave him when he was two weeks old. However, I did not expect to see an intelligence report, filed within days of his birth, containing his full name, date of birth, his father's name, and the origins of his middle name, as well as a research box showing that a Special Branch search had been conducted on him, revealing 'no trace'."*
>
> — **Emily Apple (Core Participant, 20 September 2026)**

Disclosure in the Inquiry also uncovered deliberate state strategies to subvert civil liberties and undermine democratic organizing. In its submission, the Network for Police Monitoring (Netpol) highlighted how statutory disclosure revealed internal Special Branch decision logs

demonstrating that police actively plotted to harass legal political campaigns and suppress public messaging:

> *"During the hearings for tranches two and three we were very disturbed to learn the extent to which groups advocating police accountability were targeted by Special Branch and its undercovers... It was long suspected that police had a policy of imposing bail conditions that deliberately interfered with individuals Article 10 and 11 rights, it took the UCPI to produce evidence this was the active thinking behind police actions. We can cite, for example, Operation Apache, which Special Branch plotted to target print shops, seize publicity material, raid homes and single people out for 'generalised harassment', all in the interest of preventing a political message and disrupting a group from organising..."*
> — **Network for Police Monitoring / Netpol (September 2026)**

Core Participant Guy Taylor detailed how the statutory process forced the revelations about exaggerated and fabricated reporting by UCO Simon Wellings:

> *"In a desperate bid to justify his deployment, Wellings pointed the finger at a young Asian activist (anonymised as 'MT'), alleging a plot involving a suicide vest. It was a complete invention, a toxic mix of self-aggrandisement and racial profiling designed to manufacture a threat where none existed... The truth emerged only due to disclosure and the questioning of Wellings. When the Inquiry began, I was under the impression that Simon Wellings was a genuine activist who had had his arm twisted into giving intelligence to the police. It was only during the Inquiry that we established that Wellings was a police officer, what kind of information he gathered and how he operated. This Inquiry has already been invaluable to me, and I believe it can be equally essential to other people wronged by intrusive police surveillance..."*
> — **Guy Taylor (Core Participant, September 2026)**

Synthesizing these representations, respondents across the corpus converged on the position that the Inquiry's work to date has established political policing to have been characterized by institutional corruption, the systematic fabrication of intelligence, unlawful interference in judicial processes, and severe human rights violations. Respondents argued that it was only possible to expose these issues because of the statutory powers the Inquiry has, and that any attempt to downgrade or curtail the remaining phases of the Inquiry would destroy the sole mechanism capable of uncovering and fixing state wrongdoing.

4.2 What the Inquiry Has Not Yet Examined, and Why It Matters

Respondents highlighted the fact that curtailing or substantially altering the structure of the Inquiry at this late stage would leave some victims without redress. The decision (taken many years ago) to take a chronological rather than a thematic or other approach to the investigation was largely arbitrary and means many Core Participants have yet to receive answers about the events that impacted them. Respondents argue that a decision that denies redress to some victims simply because it has taken too long to get to those events would be profoundly unfair.

Respondents across the corpus advanced a second shared position: that the work remaining to be conducted in Tranche 4 (the National Public Order Intelligence Unit / NPOIU, 1999–2011), Tranche 5 (other undercover policing activity, 1968–present), and Module 3 (current practices and future recommendations) is qualitatively more significant, contemporary, and institutionally sensitive than the historical material examined in Tranches 1 to 3. Respondents argued that curtailing the Inquiry on the threshold of Tranche 4 would represent an act of profound institutional protectionism, shielding modern police leadership, current statutory frameworks, and active state-corporate relationships from judicial scrutiny.

Contemporaneity and RIPA 2000

Respondents emphasized the difference between Tranche 4 and earlier Tranches, as it represents the pivot from historical "legacy" policing to the modern statutory era. Police witnesses in earlier tranches sought to relegate Special Demonstration Squad (SDS) abuses to an outdated historical era. However, Tranche 4 covers the NPOIU—a unit that operated entirely under the Regulation of Investigatory Powers Act (RIPA) 2000, the Human Rights Act (HRA) 1998, and formal accredited training (the National Undercover Training Accreditation Course / NUTAC); and Tranche 5 includes undercover operations linked to criminal investigations in the same period. Because these are the same statutory and regulatory frameworks that govern undercover policing today, respondents argued that testing NPOIU and criminal operations is essential.

In its formal submission, the Reclaim the Streets (RTS) cohort set out why testing the "RIPA defense" is an imperative for democratic oversight:

> *"Throughout the historical SDS tranches of this Inquiry, we have repeatedly heard state and police witnesses defend their actions by suggesting that past 'spycops' abuses were purely historical problems. They have continually asserted that the implementation of the Regulation of Investigatory Powers Act (RIPA) 2000 established a robust, modern regulatory framework that corrected these issues and ensured they 'would not happen now.' Because of this persistent defense, it is absolutely essential that the Inquiry completes its statutory Terms of Reference by fully examining the post-2000 NPOIU deployments… Tranche 4 represents the only opportunity to properly test whether RIPA actually protected the public, or whether it merely formalized, expanded, and hid these intrusive covert operations from democratic oversight. If the Home Office truncates the Inquiry before Tranche 4 is examined, the police's core defense—that RIPA solved the problem—will remain permanently unchallenged, leaving a massive, untested legislative framework and evasive leadership accounts unexamined as the blueprint for current undercover policing."*
>
> — **Reclaim the Streets Cohort (18 September 2026)**

This analysis was echoed by "Tina", a Category H Core Participant whose infiltration occurred during the NPOIU era. She submitted that shutting down Tranche 4 would preserve a state-sponsored falsehood while leaving active violations of Articles 3 and 8 of the Human Rights Act unexamined:

> *"Throughout this Inquiry, police witnesses have claimed that SDS abuses were 'legacy' issues cured by the Regulation of Investigatory Powers Act (RIPA) 2000. My case and others are living proof that this is untrue. NPOIU officers operated entirely under RIPA, yet predatory intimate relationships and severe human rights breaches continued unabated, as did massive levels of unchecked collateral intrusion, open-ended fishing expedition deployments, and disproportionate and unnecessary intrusion that could not lawfully be authorised under RIPA"*
>
> — **"Tina" (Category H / Tranche 4 Core Participant, September 2026)**

Submissions highlighted that major evidentiary gaps remain, with answers not expected until Tranche 4. Kate Wilson detailed how the distinction between tranches has actually led to evidence being obscured:

> *Large sections of the witness statements for the senior officers who gave evidence in the last round of hearings remain under 'temporary redaction', because they relate to matters to be addressed in T4. In the case of Alan Mitchell, his entire first witness statement has been withheld from disclosure until T4. Janet Williams states at paragraphs 232-236 of her Second Witness Statement that she rejects the conclusions of the IPT ruling in my case and that she is 'disappointed she was not given an opportunity to correct the evidential picture.' Yet no questions were asked of her about why she disagrees with the ruling when she gave live evidence in July, because those are matters that relate to T4. Any assessment of what went wrong with undercover policing based on the evidence heard to date will be necessarily incomplete and inaccurate. Any attempt to make recommendations for the future must first understand what went wrong in T4 and T5."*
>
> — **Kate Wilson (Core Participant, 9 September 2026)**

State-Corporate Collusion

Submissions revealed that Tranche 4 holds critical, unexamined evidence regarding how covert police units acted as publicly funded security for private multinational corporations (such as Monsanto, Bayer, BASF, E.ON, and EDF), passing intelligence to assist companies in obtaining injunctions against protesters and to compile employment blacklists.

In their formal submission, the Genetic Engineering Network (GEN) Cohort detailed how NPOIU officers actively crossed the line into provocateur tactics to protect corporate biotech interests:

> *"Our witness evidence demonstrates that the police effectively provided free, covert security to protect the commercial profits and intellectual property of private biotech firms. While criminalizing peaceful activists acting in the clear public interest to protect the environment, the state deployed highly intrusive undercover units to do the bidding of private corporations... Evidence disclosed in tranche 3 proved that UCOs were not passive observers... Evidence yet to be examined will show how NPOIU officer Mark Kennedy actively participated in the organizing group targeting Bayer CropScience in 2004. Kennedy personally hired and drove the minibus for office occupations and blockades against Bayer..."*
>
> — **Genetic Engineering Network (GEN Cohort, 17 September 2026)**

This systematic collusion was echoed by the Camp for Climate Action cohort, representing 27 individual Core Participants, who documented how covert intelligence was weaponized by energy and aviation polluters to obtain wide-ranging High Court civil injunctions:

> *"Major corporate polluters including E.ON at Kingsnorth, BAA at Heathrow, and EDF at Kingsnorth routinely used this state-supplied covert intelligence to secure wide-ranging civil injunctions, such as BAA's surreal attempt to ban 5 million people from Heathrow, designed to bypass criminal jury trials, avoid public scrutiny, and privatise political policing."*
> **— Camp for Climate Action Cohort (August 2026)**

Furthermore, environmental network submissions exposed how covert state surveillance fed directly into corporate employment blacklisting. In its collective filing, the Earth First! network cohort documented the link between NPOIU intelligence and illegal blacklists:

> *"At least 200 environmental campaigners - many linked directly to the Earth First! network and related campaigns appeared on the notorious 'greenlist' database managed by the Consulting Association. This employment blacklist was used by multinational construction and engineering corporations to deny employment to political activists. We have a profound interest in establishing how much of this highly confidential personal information was illegally fed to private firms by the police - something not yet examined by the inquiry. Additionally, NPOIU intelligence was routinely passed to private companies to support their applications for civil injunctions against protest groups."*
> **— Earth First! Cohort (17 September 2026)**

Miscarriages of Justice and Legal Professional Privilege

Respondents stressed that Tranche 4 includes some of the biggest criminal and civil miscarriages of justice, highlighting that undercover officers in the NPOIU systematically subverted the criminal justice system by acting as agents provocateurs, infiltrating defense teams, and concealing exculpatory evidence from trial judges and prosecutors.

In his submission, solicitor Mike Schwarz of Hodge Jones & Allen cited the Crown Prosecution Service's own acknowledgement of this, together with the conclusion of the

2014 Ellison Review, to demonstrate that non-statutory review bodies, including the Criminal Cases Review Commission (CCRC) are structurally incapable of uncovering these police-perpetrated miscarriages of justice on their own:

> *"The Crown Prosecution Service has emphasised that in light of the general lack of revelation to prosecutors set out above, there are now inevitable barriers to finding cases of concern through examining CPS files, as it is entirely dependent upon what it is told by the Police. Whilst steps have been taken to respond to cases that have been drawn to its attention, such as the Kennedy cases, the CPS does not have a mechanism by which it is able to provide a comprehensive check of cases of potential relevance because it cannot identify cases where the Police did not reveal potentially relevant undercover activity... Ellison concludes... 'The relative lack of progress of this Review over the last year, the complexity which has been encountered in making progress over any reasonable timescale, and the limitations that may exist as to either the CCRC or the CPS referring cases back to an appellate court, all suggest that it may now be appropriate for the Public Inquiry to become engaged in these issues.'"*
> — **Mike Schwarz, Hodge Jones & Allen (18 September 2026)**

This legal reality was reinforced by the Ratcliffe-on-Soar cohort, the largest single cohort of miscarriages of justice victims in the Inquiry. They submitted that after state bodies spent over a decade using the existence of the UCPI to block disclosure in appellate courts and tribunals, shutting down the Inquiry now would constitute an act of supreme bad faith:

> *"Our case was the catalyst leading to the creation of the Inquiry. The pre-emptive arrest of 113 people at the Iona School revealed that undercover policing operations were actively misleading the criminal justice system. The collapse of the 'Ratcliffe 6' trial and the 2011 Court of Appeal ruling quashing 20 convictions established that a grave miscarriage of justice had occurred... During criminal appeals relating to the Ratcliffe case, CCRC processes, and civil litigation, our legal representatives repeatedly sought disclosure of Kennedy's logs, surveillance recordings, and intelligence reports. Elementary disclosure rules were disregarded by both the police and the CPS. When we pursued this material across multiple legal forums, the state consistently opposed, narrowed, or stayed those actions, explicitly arguing that individual proceedings were inappropriate because the statutory Undercover Policing Inquiry was the proper vehicle for disclosure and to investigate these operations. Having spent a decade relying on the existence of the UCPI to fend off disclosure across every*

other court and tribunal, for the state now to shut down the Inquiry before it reaches Tranche 4 constitutes an egregious bad-faith manoeuvre that would permanently lock away suppressed evidence..."

— **Ratcliffe-on-Soar Core Participant Cohort (17 September 2026)**

Furthermore, individual Core Participants submitted that NPOIU officers systematically spied on confidential legal support and defense strategy meetings. Core Participant Ceri Gibbons (Smash EDO) highlighted:

"Our community anti-war protest group was infiltrated by undercover NPOIU officer EN1, using the cover name 'Marco Jacobs'... EN1/Marco Jacobs spied on our legal support meetings, including by offering his flat in Brighton as a venue in which to hold them... I strongly oppose any proposal to limit the scope of this Inquiry. Doing so would risk allowing the truth to remain buried... It would amount, in my view, to a state cover-up of the full truth."

— **Ceri Gibbons (Core Participant, 17 September 2026)**

Officers from both the SDS and the NPOIU were involved in the Fairford Coaches incident, and while some questions were asked in Tranche 3, the case falls to be investigated fully in Tranche 4. For core participants linked with the judicial review of the policing of that event (*R (Laporte) v Chief Constable of Gloucestershire*), there are important questions about how the outcome of this legal case may have been shaped by failures to disclose the involvement of undercover officers. over officers. There is concern that the police withheld evidence from the highest courts in England and Wales. Jesse Schust reflects:

“In particular, I was very upset to learn that Richardson was an undercover police officer who may have withheld evidence relevant to the judicial review. This may have altered the outcome of our legal cases. The judicial review and subsequent appeals revealed that the Gloucestershire Constabulary had made decisions based on faulty intelligence. Is it possible this poor intelligence was shaped by misleading reports from Richardson or other undercover police officers? I would like to know, or at least have the judiciary be able to examine the information themselves.”

— **Jesse Schust (Core Participant, 17 September 2026)**

The joint letter from the Non-Police Non-State Core Participants and their Recognised Legal Representatives, filed in the first week of the consultation, also identified categories of unexamined misconduct and how those need to be addressed:

> *"Some of the most egregious behaviour in undercover policing is yet to emerge including, but not limited to, miscarriages of justice, undercover police officers acting as Agents Provocateur and failures around the policing of racist criminal gangs. It is vital that these issues are explored and that the NSPCPs receive disclosure; that the voices of the NPSCPs are heard in public through live / written evidence and exhibits; and that the public officials implicated are required to give evidence."*
> **— Non-Police Non-State Core Participants and Recognised Legal Representatives (22 July 2026)**

The significance of Tranche 5

Respondents warned that truncating or abandoning Tranche 5 (which covers non-SDS, non-NPOIU undercover policing activity by regional police forces from 1968 to the present) would leave severely traumatized victims without truth, disclosure, or public cross-examination, while entirely shielding undercover deployments by regional police forces and in criminal investigations from scrutiny.

In her submission on behalf of the Centre for Women's Justice (CWJ), solicitor Harriet Wistrich set out the devastating facts of 'Gabriella', a designated Category H Core Participant whose case sits in Tranche 5:

> *"'Gabriella' was deceived by an undercover police officer in a relationship lasting over 19 years. The extent of duplicity and connivance of a range of state institutions in keeping her in the dark for several years, deserves its own public inquiry... The UCO raised her daughter as his own and then planned a further child, who was conceived and is now a teenager. She only learnt of his deceit in 2020 when she was informed by Avon and Somerset Police who also told her that as a result of the UCO's tasking she and her children were and remain at an Article 2 and 3 risk... We understand significant investigative work has already taken place in relation to this tranche of the Inquiry."*
> — **Harriet Wistrich, CEO Centre for Women's Justice (20 September 2026)**

This was strongly reinforced in the joint submission by Police Spies Out of Lives (PSOOL) and Category H Core Participants, who highlighted that Gabriella's case demonstrates the human cost of any attempt to abandon Tranche 5:

> *"Core Participant Ruling 47 (27 April 2023) records the case of 'Gabriella,' designated to Tranche 5. An undercover officer conducted an intimate relationship with her over 'a lengthy deployment'; the Inquiry's ruling describes the consequences for her as 'literally, life changing,' and grants her anonymity on the basis that disclosure of her identity would risk her rights under Articles 2 and 3 of the European Convention on Human Rights—the right to life, and to freedom from inhuman or degrading treatment. Her case has not yet been heard. It sits in the tranche this consultation is asking whether to abandon. She is not a hypothetical illustration of what curtailment would cost. She is a named Core Participant currently who would be directly impacted by it."*
> — **Police Spies Out of Lives (September 2026)**

In addition, Core Participant Ben Leamy explained the importance of Tranche 5 in understanding whether undercover operations by regional police forces were subject to the same failings as the Metropolitan Police units:

> *" I understand that some forces were operating their own covert units targeting political groups in their areas and it will be important to examine such operations to help dispel any notion that abuses were limited solely to 'rogue' units within the Metropolitan Police. T5 is due to examine the shocking case of a woman deceived into an 18-year relationship with an undercover officer supposedly working on a criminal case. It is essential that this is properly examined, not only for her, but also because it would help reveal the extent to which abuses were not limited to the so-called 'intelligence only' units, but also to undercover criminal investigations."*
> — **Ben Leamy (Tranche 3 & 4 Core Participant, 7 September 2026)**

Kate Wilson also highlighted the importance of T5 in examining whether undercover deployments in criminal investigations were subject to improved oversight:

> *"The reality is that despite significant differences in management and regulation, much the same went wrong in both [the SDS and the NPOIU], and in the deployments linked to criminal investigations that will be scrutinised in T5. The Inquiry needs to find out why."*

— **Kate Wilson (Category H / Tranche 4 Core Participant)**

Part 5 — The Proposals in the Consultation Paper

5.1 The Narrower Statutory Inquiry

A central finding across the consultation corpus is that respondents overwhelmingly rejected the proposal to replace the current process with a "narrower, clearly defined, potentially time-limited statutory inquiry." Respondents across all participant categories argued that narrowing the scope or imposing arbitrary statutory time limits would exclude unexamined undercover units and abandon victims who have already waited over a decade for disclosure.

> *"The Inquiry should complete Tranches 4 and 5 and Module 3, as set out in its original Terms of Reference. There is no version of 'streamlining' that does this and doesn't also mean some of us go unheard."*
> — **Alison (Category H Core Participant, 26 August 2026)**

Submissions from personalized representations emphasized that narrowing the Inquiry prior to hearing Tranche 4 (the National Public Order Intelligence Unit / NPOIU) and Tranche 5 (other undercover policing units) would force the Home Office to make decisions in total ignorance of what those tranches contain. "Lindsey", a Category H Core Participant, highlighted that narrowing the Inquiry at this stage would compound historical harms:

> *"The Inquiry is currently working through Tranche 3, examining the Special Demonstration Squad in the 1990s. Tranches 4 and 5—covering the National Public Order Intelligence Unit and the most recent decades of undercover deployments, including officer conduct closest to the present day—have not yet been examined. It would be perverse, and would undermine the entire purpose of the Inquiry, to curtail or restructure its work before this evidence has even been heard. The public and the core participants have no way of knowing what these tranches will reveal, and any decision to limit the Inquiry's scope now is necessarily being made in the dark."*
> — **"Lindsey" (Category H Core Participant, 27 August 2026)**

The joint letter from the Non-Police Non-State Core Participants and their Recognised Legal Representatives anchored the objection in the Inquiry's founding purpose, contrasting the 2026 proposals with the mandate given to Parliament in 2015:

> "*Curtailing the Inquiry now would fail to address the significant public interest identified to Parliament by the then Home Secretary Theresa May when the Inquiry was set-up, namely the public interest in 'learning the lessons of past failures' in order to 'improve the public's confidence in undercover work' and to 'ensure there is no repeat of these failings in the future.'"*
> **— Non-Police Non-State Core Participants and Recognised Legal Representatives (22 July 2026)**

In its collective response, the Earth First! cohort submitted that narrowing the Inquiry's scope would undermine the mandate established by Parliament and the Home Department in 2015:

> *"If the Home Office closes the door now, it is not just truncating a timetable—it is actively mutilating the very Terms of Reference the Inquiry was legally mandated to resolve. Any interference by the home-office is clearly unacceptable. We have waited over a decade for truth and will continue to campaign for accountability and transparency regardless of any attempt by the state to shield itself from public scrutiny."*
> — **Earth First! Cohort (September 2026)**

5.2 The Non-Statutory Review

Respondents unanimously rejected the consultation paper's second proposed option: converting the UCPI into an "independent non-statutory inquiry or review." The corpus demonstrates a comprehensive legal and practical consensus that a non-statutory review would be unworkable and incapable of uncovering state wrongdoing, because it would lack the compulsory powers that have made this Inquiry effective. They also challenged the consultation's use of the draft Public Office (Accountability) Bill 2026 as a justification for a non-statutory process, arguing that a Bill not yet in force cannot substitute for a statutory inquiry possessing Section 21 powers of compulsion, and that the duty of candour the Bill would introduce was fought for by the Hillsborough families precisely to open up state secrecy, not to close an active investigation down.

In a dedicated submission, the Hillsborough Justice Campaign pointed out that the Hillsborough families did not fight for decades in order to be used as a convenient administrative cover for shutting down an active statutory investigation:

> *"It is of great concern to us that the Inquiry might be curtailed before all evidence has been heard and we are equally concerned that The Public Office (Accountability) Bill (more commonly known as Hillsborough Law) is being cited as a potential justification for curtailing the Inquiry... Survivors haven't fought for all these years so a law (not yet enacted) can be used to deny other victims truth and accountability."*
> — **Ken Derbyshire (Chair, Hillsborough Justice Campaign, Sept 2026)**

This was reinforced by non-state Core Participant Debbie Vincent:

> *"The consultation questionnaire perversely cites the future, un-enacted Public Office (Accountability) Bill 2026 ('Hillsborough Law') to rate alternative, non-statutory 'independent reviews' as effective options. This is a severe whitewash. While the 'Hillsborough Law' is a vital legislative development designed to institutionalise a duty of candour across public administration, it remains before Parliament and is not yet law. In any event, it must not be used as an administrative pretext to downgrade, curtail, or dissolve a live statutory inquiry."*
> — **Debbie Vincent (Non-state Core Participant, 10 September 2026)**

Individual respondents pointed to the shortcomings of non-statutory reviews. Duncan Law sets out that:

> *"An independent non-statutory review lacks the legal teeth needed to force retired officers or police managers to give truthful evidence under oath."*
> — **Duncan Law (Individual Consultation Respondent, August 2026)**

Legal representatives backed this up by emphasising that non-statutory reviews lacking compulsory powers have repeatedly proved incapable of extracting evidence from reluctant state witnesses. In the joint submission filed on behalf of the Non-Police, Non-State Core Participants' Co-ordinated Group, Kirsten Heaven submitted:

> *"Prior to the establishment of the Inquiry, there were at least 18 separate non-statutory or internal police investigations—including internal reviews, IPCC inquiries, and HMIC reports. However, these completely failed to expose the scale of the misconduct and abuses that were carried out by undercover police*

> *officers, including in Tranche 4. In 2011, a HMIC report was not published when it was publicly exposed that a major miscarriage of justice had been missed... A non-statutory inquiry lacks legal powers under the Inquiries Act 2005 to compel witness testimony under oath or enforce document production. In the face of proven police resistance, a non-statutory body would be powerless."*
>
> — **Kirsten Heaven, Doughty Street Chambers (18 September 2026)**

Pete Weatherby KC, counsel for Core Participants, addressed the consultation's premise directly, including its reliance on the draft Public Office (Accountability) Bill:

> *"The current statutory inquiry has the best available powers. It is hoped that the 2026 Bill [Hillsborough Law] will be enacted and brought into force to add to those during the remaining time of the process. Bringing the inquiry to an end and establishing one with less powers adds nothing to make the process more efficient, but it will undoubtedly reduce the effective participation of those affected by the wrongdoing and failures already identified."*
>
> **— Pete Weatherby KC (20 July 2026)**

5.3 Voluntary Disclosure to Individuals (The FOI / SAR Fallacy)

Respondents expressed universal condemnation and outrage at the consultation paper's third proposed alternative: terminating the Inquiry and leaving "relevant organisations" (specifically police forces) to manage the disclosure of material directly to affected individuals without inquiry-style testing of evidence or any attempt to learn lessons or seek recommendations.

.

Respondents argued that proposing voluntary police self-disclosure as a serious option was grotesque, absurd, and insulting. They highlighted that non-state participants have spent more than 15 years attempting to obtain information from police forces via Freedom of Information (FOI) requests and Subject Access Requests (SARs) under Data Protection legislation, receiving almost blanket denials, heavy redactions, or false assurances that records had been destroyed].

Core Participant Guy Taylor detailed his direct personal experience of receiving false and contradictory statements from Metropolitan Police SAR processes regarding undercover officer "Simon Wellings":

> **“***The alternative options include people receiving disclosure directly from the state parties holding the information. It is hard to fathom how this has been offered as a serious option - getting disclosure through FOI or SAR is essentially impossible... I have submitted two SARs over the years... Each returned an entirely different set of data, and the second... categorically denied that Metropolitan Police had any record of 'Simon Wellings'! It is only through statutory powers under the Inquiries Act 2005 compelling documents and cross-examining officers under oath—that such fabrications and supervisory failures can be exposed."*
> — **Guy Taylor (Core Participant, September 2026)**

In her submission, "Tina", a Category H Core Participant, similarly exposed the fantasy of voluntary state candour:

> *"I also strongly condemn the alternative options floated in your consultation, particularly the absurd suggestion that victims could receive 'direct disclosure' from the police agencies responsible. Decades of history prove that voluntary agency disclosure is a complete fantasy. Victims and journalists have spent years filing Freedom of Information (FOI) requests and Subject Access Requests (SARs), only to face systematic stonewalling, heavy redactions, or outright denials even for documents known to exist, such as Special Branch Registry Files."*
> — **"Tina" (Category H / Tranche 4 Core Participant, 18 September 2026)**

Dr Dónal O'Driscoll, Core Participant in person and Director of the Undercover Research Group (URG), emphasised that voluntary disclosure mechanisms had repeatedly failed prior to the establishment of the UCPI:

> *"... it was offensive to read in among the consultation options the suggestion of a Hillsborough style process, when to date the police have failed to be candid even in the face of the evidence... demonstrating the very opposite of candour. Likewise, to suggest that people put in requests for our files. We have been*

> *asking for them since 2011, but still to get them. I have made multiple such requests and received minimal responses…"*
> **— Dr Dónal O'Driscoll (Core Participant-in-Person, 17 September 2026)**

It should be noted that rejection of the alternatives proposed in the consultation is not merely a critique of the consultation questionnaire, but rather it forms part of the positive demands. Respondents submitted that state parties under investigation have demonstrated a chronic lack of candour, an established record of active file destruction, and repeated applications for secrecy and restriction in order to keep evidence suppressed. The Climate Camp cohort, representing 27 individual Core Participants, explained that abandoning the proposed alternatives is a prerequisite for restoring faith in the process:

> *"We strongly object to any proposal to abandon or limit the current Inquiry and stand in complete solidarity with all non-state Core Participants and insist that the Inquiry's full Terms of Reference be maintained and that this consultation be withdrawn."*
> **— Frances Wright (Climate Camp Legal Team, August 2026)**

5.4 Proceeding to Module 3 in a Factual Vacuum

A major finding in the corpus is that respondents firmly rejected any proposal to jump directly to Module 3 (current practices and future recommendations) without first completing the factual investigations in Tranche 4 (NPOIU) and Tranche 5 (other units). Respondents submitted that attempting to draft recommendations for future undercover policing without establishing what occurred during the modern RIPA era would be meaningless. In its formal submission, the Reclaim the Streets cohort set out why Module 3 cannot function in an informational vacuum:

> *"This legislative examination is directly and inextricably linked to the vital work of Module 3, which is tasked with making robust, systemic recommendations for the future... To draft future recommendations without investigating the NPOIU era would require the Inquiry to accept the state's untested assertion that RIPA is a functional safeguard. This would reduce Module 3 to a toothless, rubber-stamping exercise—basing its 'future recommendations' on a fictional premise. For our political and social networks, which fractured and collapsed under the weight of state infiltration, nothing less than a complete, evidence-led examination of both the modern era (Tranche 4) and its future regulation*

> *(Module 3) is acceptable to protect democratic freedoms and restore public trust."*
> — **Reclaim the Streets Cohort (18 September 2026)**

This critique was supported by Core Participant Robert Banbury, who argued that drafting future recommendations without investigating NPOIU abuses would render the Inquiry's final report useless:

> *"Furthermore, you cannot expect the Chair to issue recommendations for future policing in Module 3 if you block him from investigating how RIPA was actually used to cover up state overreach over the last 25 years. Moving to Module 3 without examining Tranche 4 would reduce the final report to a pointless husk, now that is a real waste of public money!!"*
> — **Robert Banbury (Core Participant, September 2026)**

Legal submissions reinforced that future recommendations must be grounded in an understanding of statutory failures across both national and regional units. In her submission on behalf of the Centre for Women's Justice (CWJ), Harriet Wistrich submitted:

> *"Tranches 4 and 5 of the UCPI are extremely important as they cover the time when undercover police officers operated under the regulatory and statutory oversight of the Human Right Act 1998 and Regulation of Investigatory Powers Act 2000, legislation that is intended to protect the public today... In summary, therefore, we submit that it is crucial that - certainly in respect of Category H Core Participants, - the Inquiry continues with evidence given in Tranches 4 and 5 and recommendations made about the future of undercover policing and the need for legislative and policy changes to prevent such terrible violations of human rights being repeated."*
> — **Harriet Wistrich, CEO Centre for Women's Justice (20 September 2026)**

Respondents identified the College of Policing and HMICFRS as bodies whose work in training, guidance and inspection depends on the recommendations the Inquiry has yet to make. Emily Apple, a Core Participant, noted that the College had recently told a journalist that it was "*waiting on the recommendations of the inquiry to update their guidance*," and argued that while the police should not use the Inquiry as an excuse for delay, updating guidance is *"an obvious essential part of the inquiry."*

Dr Dónal O'Driscoll cited Sir Thomas Winsor's statement to the Inquiry that "*the discovery and recommendations of the UCPI would inform future inspections around undercover policing made by HMICFRS*," and argued that recommendations alone are insufficient without inspection mechanisms to enforce compliance. Netpol made the related point that the College's Authorised Professional Practice was updated "*well over a decade ago*" and does not reflect what has been learned in the SDS tranches or what is likely to emerge from Tranches 4 and 5. On the respondents' account, the bodies that would implement Module 3 recommendations are waiting for findings that Tranches 4 and 5 have not yet produced.

Part 6 — What Respondents Said Must Happen

Parts 3–5 record what respondents said was wrong with the consultation, why the Inquiry's remaining work matters, and why each of the Home Office's proposed alternatives is inadequate. This Part records what respondents said should happen instead. The 63 unique-voice submissions converged on a single core demand: complete the Terms of Reference as a statutory public inquiry under the Inquiries Act 2005 across Tranches 4, 5 and Module 3, and do so with the governance, candour, engagement and funding necessary to finish the job. *[63/63, 100%.]*

Respondents submitted that only a statutory inquiry possesses the legal powers required to ensure documents are produced, compel witnesses to attend, and conduct meaningful cross-examination under oath. They further submitted that Tranche 4 (NPOIU deployments under RIPA 2000), Tranche 5 (regional undercover units) and Module 3 (future policy recommendations) form an integrated chain: truncating Tranche 4 or 5 would deprive Module 3 of the evidential foundation needed to construct meaningful recommendations. The "inseparability" point is therefore an argument for completion, not a separate demand.

Evidence. Kirsten Heaven, on behalf of the Non-Police Non-State Core Participants' Co-ordinated Group, submitted:

> *"The NPSCPs maintain that the Inquiry must be fully resourced and maintained as a statutory inquiry so that its original Terms of Reference can be satisfied... The spycops scandal represents one of the most grave, systemic abuses of state power in modern British history. Public money was used to infiltrate lawful campaigns, subvert democratic accountability, mislead the courts, and sexually exploit women. The victims of this scandal have waited over a decade in good faith for answers."*
> **— Kirsten Heaven, Doughty Street Chambers (on behalf of NPSCPs, 18 September 2026)**

Dr Dónal O'Driscoll emphasised that statutory powers are essential in getting to the truth:

> *"The statutory nature of the UCPI has been fundamental in getting to the truth in the face of police desire to keep its laundry from being washed... The Inquiry must be fully and properly resourced and allowed to complete its work on the NPOIU, on Tranche 5 and Module 3. It must be a statutory inquiry with the necessary powers to take action."*

— Dr Dónal O'Driscoll (Core Participant-in-Person, 17 September 2026)

6.1 How it must be done: four requirements

Requirement 1 — Appoint a successor Chair and an expert panel without delay

The Home Secretary should exercise the appointment powers under ss.4 and 7 of the Inquiries Act 2005 to appoint a multi-disciplinary expert panel alongside a successor Chair before Sir John Mitting retires in 2027. *[60/63, 95.2%.]*

Respondents submitted that relying on a single judge has created an unnecessary administrative bottleneck, and that an expert panel would have averted that. Delay in appointing a successor Chair risks further obstructing the Inquiry just as Tranches 4 and 5 are set to begin, creating more delays rather than solving that problem. Furthermore, an expert panel — comprising specialists in institutional misogyny, state racism, and democratic rights — is essential to properly contextualise political surveillance and abusive cultures in the police.

"Lindsey" emphasised that transparent leadership appointments would signal genuine commitment to completion:

> *"I also urge the Home Secretary to move quickly to appoint a panel of experts to support the Undercover Policing Inquiry and to confirm a new Chair as a matter of urgency. Swift, transparent appointments - made in consultation with core participants rather than imposed on them - would demonstrate that the government is genuinely committed to the Inquiry completing its full Terms of Reference not managing its way towards an early conclusion."*
> **— "Lindsey" (Category H Core Participant, 27 August 2026)**

C Wilson submitted that an expert panel is necessary to overcome potential blind spots regarding systemic police racism and misogyny:

> *"... instead of a single judge, a panel would make more sense for this inquiry... such a panel could also provide Mitting with the kind of expertise he patently lacked (eg an understanding of issues such as institutional racism and sexism)."*
> **— C Wilson (Core Participant in Person, September 2026)**

Requirement 2 — Impose enforceable disclosure timetables

Respondents call on the Home Office to incentivise efficiency and candour from state parties, rather than rewarding inefficiency, lack of candour and delays. The Inquiry Chair should impose strict, legally enforceable disclosure timetables on state core participants, with sanctions for non-compliance. The Home Office should use its sponsorship leverage to require full police cooperation within those timetables. *[58/63, 92.1% for timetables and candour.]*

Respondents submitted that the primary drivers of how long the Inquiry has taken have been state anonymity applications and satellite litigation, closed hearings, and a protracted redaction and disclosure process that suffers chronic delays. They explain that the remedy is to enforce cooperation, not to curtail scrutiny.

Pete Weatherby KC, counsel for Core Participants, set out the alternative to curtailment:

> *"The answer is and always has been to require state CPs to fully cooperate with the inquiry at the earliest possible point, proactively provide it with relevant information and materials within expedited timetables, and efficiently deal with legitimate public interest issues. Where that is done, the inquiry process is able to hone the issues which require further investigation and oral evidence, make timely disclosure and obtain the assistance of all CPs including those most affected, leading to an efficient and meaningful outcome."*
> **— Pete Weatherby KC (20 July 2026)**

The Reclaim the Streets cohort demanded that the Home Office use its administrative leverage to enforce full police cooperation:

> *"We demand the immediate implementation of a streamlined, state-compelled disclosure process that prioritizes prompt release of files to survivors and strips away the excessive secrecy and state-manufactured obstruction that have plagued this process since 2015."*
> **— Reclaim the Streets Cohort (18 September 2026)**

Some suggestions were also made about how to improve the efficiency and effectiveness of evidential disclosure, particularly the importance of adopting group and contextual disclosure models rather than relying on document-by-document disclosure to named individuals. They further submitted that individual-level disclosure atomises collective harms and omits the upper-level material that explains it, which risks obscuring systemic issues. *[38/63 60.3%]*

The Social Centre Networks cohort set out why individual file disclosure is structurally inadequate:

> *"... the Home Office's consultation repeatedly frames 'disclosure' as a matter of releasing files to 'affected individuals'. This demonstrates a fundamental, fatal misunderstanding of how political policing actually operated… Any process focused strictly on individual-level disclosure inevitably misses the bigger picture, excluding upper level authorisations, decision logs, reports and briefings, without which it is impossible to understand the context and significance of an intelligence report mentioning your own name."*
> **— Social Centre Networks Cohort (17 September 2026)**

Requirement 3 — Replace administrative consultation with trauma-informed direct engagement

Respondents insist that Home Office and the Inquiry must adopt explicit trauma-informed engagement for all future contact with affected survivors, replacing hostile administrative consultations and protocols with direct, respectful dialogue with Core Participants and affected people, conducted before policy decisions are taken rather than after. *[52/63, 82.5%.]*

Respondents condemned the timing and execution of the July 2026 consultation as a re-traumatising exercise. They submitted that direct engagement should have preceded the consultation, not followed it.

Police Spies Out of Lives spoke of the urgent need to avoid the distress caused by state-generated delay:

> *"For women in our group, there is an urgent need for an improved process of disclosure and a genuine trauma-informed approach. Many women affected in earlier tranches were retraumatised by the ongoing delays, which are the result of repeated applications for anonymity, secrecy and extensive redactions by the state."*
> **— Police Spies Out of Lives (September 2026)**

"Tina" stressed that direct engagement should have occurred before the consultation took place:

"I formally request a direct, trauma-informed online or in-person engagement meeting between the Consultation Team, Category H survivors, and our legal representatives (something that clearly should have occurred before this consultation was launched)"
— "Tina" (Category H / Tranche 4 Core Participant, September 2026)

Requirement 4 — Fund the Inquiry to completion

Respondents stress that the Home Office should commit to ensuring the Inquiry is properly resourced to complete Tranches 4, 5 and Module 3. *[57/63, 90.5%.]*

Dr Donal O'Driscoll emphasised that not only must the inquiry be properly resourced, it is the responsibility of the Home Office to ensure that there is the political will to enforce cooperation and candor from the agencies it oversees:

"The Inquiry must be fully and properly resourced and allowed to complete its work on the NPOIU, on Tranche 5 and Module 3. It must be a statutory inquiry with the necessary powers to take action. If there are issues, it rests with the Home Office, who oversees all the state agencies with a vested interest, to ensure that they are cooperating fully and with candour..."
— Dr Dónal O'Driscoll (Non-State Core Participant in Person):

Respondents submitted that abandoning the Inquiry on the threshold of its most critical tranches would squander the investment already made. Ben Leamy set out the logic of ensuring genuine value for money:

"The Government has already spent many years and a very substantial amount of public money establishing and conducting this Inquiry. The best way to protect that investment and deliver genuine public value is not to abandon the work when it becomes more challenging than anticipated. It is to ensure that the Inquiry is properly resourced, made more efficient, protected from unnecessary interference, and allowed to finish the job it was established to do."
— Ben Leamy (Tranche 3 & 4 Core Participant, 7 September 2026)

6.2 The essential outcomes

Question 5 of the consultation questionnaire asked respondents to rate seven outcomes on a 1–5 scale, explicitly juxtaposing statutory functions against "delivering public value for money by prioritising concluding the Inquiry" and "delivery of timely conclusions by prioritising concluding the Inquiry" (Appendix 8.6). This structure appears to present the Inquiry's statutory functions as competing commodities from which a shorter list of priorities might be selected.

Respondents rejected that premise outright. Nevertheless, the refusal to rank these outcomes against each other should not be interpreted simply as a failure to value them. On the contrary many Respondents highlighted the importance of the listed outcomes, while stressing that they form a sequence of interdependent stages and that seeking to dispense or curtail any of them would sever the chain. The demand is therefore not for any single outcome to be prioritised above the others. But rather that the chain of essential outcomes be kept intact.

Disclosure of relevant documentation to victims

Meaningful victim participation requires enabling survivors to examine the evidence and process the state intrusion into their lives.

> *"Full Disclosure to Survivors: The police and Home Office must end their systematic obstruction of disclosure. Survivors have a right to see their full police files and learn the true extent of state interference in their personal and political lives."*
> **— Eleanor Fairbraida, (Category H, Tranche 4 Core Participant, September 2026)**

Disclosure of contemporary documents to those with direct knowledge of the events in question is also essential to enable the Inquiry to understand the context for those documents and to challenge and contrast unreliable police accounts. This process has formed an important part of revealing concealed wrongdoing examined at Part 3.5 above.

> *"Time and again in this Inquiry we have seen that it is only through disclosure of the relevant documents to the non-state core participants that the full extent of the wrongdoing and corruption among officers and within the units has been revealed."*
> **— Ben Leamy (Tranche 3 & 4 Core Participant, September 2026)**

Disclosure is the first step both for healing and for getting to the truth.

> *"We, the affected women, need disclosure and live hearings in order to heal. The Inquiry needs these things, because, without the assistance of civilian witnesses it will be difficult, or impossible for them to meaningfully and accurately interpret what they read and are told by those responsible, who of course want to hide and minimise their abuses."*
> **— Police Spies Out of Lives (September 2026)**

Opportunities for those impacted to share experiences

Survivors need to see the documentary evidence, but they must also be given the opportunity to recount their own experiences and set the record straight.

> *"One of our key demands for decades has been for the state to release our files. However, releasing the files is not enough on its own. It is only through the content of these files being interrogated through our own archives and live evidence that we have any chance of getting to the truth and correcting the lies told about us - let alone even starting to think about what justice would look like for the abuses we've faced. The examples that I'm highlighting below show why it is this dual approach, disclosure and live evidence, that is essential, and therefore why the inquiry must continue in its present form."*
> **— Emily Apple (Core Participant, September 2026)**

Survivors bring irreplaceable perspectives to the Inquiry's understanding of covert policing that decision-makers must listen to and embed into operational reforms.

> *"Survivors of the undercover policing scandal — both those actively engaged as Core Participants, and the many who were also spied on but who are not Core Participants — bring direct, lived experience to the Inquiry, and deserve more, not less from the process... It is vital that you listen to the demands of the survivors of abuse, misconduct and unlawful deployments of undercover police."*
> **— Chris Mitchell (Consultation Respondent, August 2026)**

> *"Truncating would mean this evidence would never be heard and recommendations for future action based on the full evidence, including testimony from those victims, would not be made — which are essential in these increasingly repressive times."*
> **— Duncan Law (Consultation Respondent & Activist, August 2026)**

Public accountability for those responsible for bad practice

Public accountability starts with undercover officers, operational managers and senior managers being compelled to give evidence. They must publicly account for what happened.

> *"I want the truth, to be told properly, by the people who still owe it - including the officers and their managers who have not yet given evidence, and whoever in the Home Office is currently deciding how much of this Inquiry the public gets to see completed."*
> **— "Alison" (Category H Core Participant, August 2026)**

> *"Both the Police and the Home Office are and have been ultimately responsible for the undercover policing being scrutinised, and hence the shocking and scandalous systemic wrong-doing committed since 1968 by the political undercover units. They have a vested interest in undermining and curtailing this hugely embarrassing Inquiry. But conversely, they also have a duty to be held publicly accountable, to learn from the mistakes... and to take heed of the recommendations due once the Inquiry is concluded."*
> **— Dave Morris (Core Participant / McLibel Defendant, September 2026)**

It is important for the process of understanding and reconciling what happened and ensuring that it never happens again:

> *"Kennedy and Jacobs deceived multiple women into long-term relationships during their deployments with the National Public Order Intelligence Unit. Their conduct, and the conduct of the managers who ran them, and the justification for the deployments, has never been examined by the Inquiry... We submit that it is vital that women affected and the wider public see these officers and their managers being formally questioned, required to explain their actions and account for their wrongdoing in*

order to prevent this happening again."

— Police Spies Out of Lives & Category H Core Participants (September 2026)

Survivor participation is not a courtesy but a condition of accountability: victims cannot process what was done to them, and the Inquiry cannot test the evidence, unless those affected are able to engage not only with the documentary material but also with the people who produced it.

“It is therefore very important that the Inquiry is able to take an integral approach to the evidence. Survivors must be able to tell their stories and the perpetrators must be called to answer publicly for their actions, in an arena where those affected can witness and provide support to each other.”

— Police Spies Out of Lives (September 2026)

“Justice means being able to process what's been done to me. I can't properly process the impact of these undercover operations until I've both seen full disclosure and had the opportunity to question the people who perpetrated it... I've engaged with the inquiry for the past 11 years, and have dedicated substantial parts of my free time over the last two years to the evidential process, including searching through archives, reading through hundreds of documents, writing hundreds of pages, and giving and watching live evidence."

— Emily Apple (Core Participant, September 2026)

These first three outcomes - disclosure of documents, hearing from victims and questioning perpetrators - are therefore all vital elements for survivors, because they enable understanding and processing what happened. However they are equally vital for the Inquiry itself, because they create the body of evidence that enables the Inquiry to carry out its key duties of establishing complete factual findings, identifying institutional failures, and recommending future reforms:

"Those three central tenets are inseparable. It is not possible to properly identify failure and thereby accountability without establishing the full facts. It is not possible to learn lessons and make recommendations for the future without a definitive official determination of the facts and where responsibility for failures lies."

— Pete Weatherby KC (Recognised Legal Representative, July 2026)

Establishing findings of fact

Establishing the facts means ascertaining what happened, based on the best possible evidence is the precondition for everything else the Inquiry must do:

> *"It is impossible to learn lessons and make recommendations for the future (Module 3) without a definitive official determination of the facts and without establishing where responsibility for failures lie in other cases of undercover policing spying. Examining and understanding what went wrong is therefore critical to recommendations for the future of undercover policing."*
> **— Kirsten Heaven, Doughty Street Chambers (on behalf of NPSCPs, September 2026)**

Again, Respondents stressed the importance of the Inquiry considering the bigger picture. While victims may wish to see individual accountability, the Inquiry must seek to expose and understand the institutional culture and failings that will be central to any meaningful recommendations for change. "Lisa", a Category H Core Participant, explained why institutional fact-finding — rather than individual prosecution — is the point:

> *"It has always been incredibly important to me to find out at an institutional level what went wrong. I haven't sought to simply prosecute one 'rogue officer', because I have never bought into the narrative that this process was about routing out individual wrongdoings, but rather that it's about uncovering the institutional attitudes and culture... For me, it's about finding out what happened, why and how it was allowed to happen, who knew what, and what patterns have been established over many years of similar behaviour..."*
> **— "Lisa" (Category H Core Participant, via Centre for Women's Justice Submission, September 2026)**

Delivering recommendations for the future

This is, by necessity, the last step in the process, as it can only be meaningfully done once all the evidence has been considered and the facts established. However, last is by no means least:

"I have referred so far to individual instances of miscarriages of justice. This focus should not detract from the wider point — that the very purpose of the Inquiry is to identify systemic problems and causes and make recommendations for the future. "
— Mike Schwarz (Solicitor & Recognised Legal Representative, Hodge Jones & Allen, September 2026)

"There is a need for a root and branch consideration not just of the law, but of the regulatory framework and the now dated Codes of Conduct and National Intelligence Model. The UCPI is very well positioned to do this and make the necessary recommendations in a way that is transparent to the public, and which the public and core participants can feed in on. To not facilitate this would be to squander a valuable opportunity and all the resources that have been poured into the Inquiry to date."
Network for Police Monitoring (Netpol)

One key point made by Respondents about recommendations is that if the Inquiry fails to provide recommendations that really would represent a waste of time and money. They reframe the concept of "value for money" as something to be assessed on what the Inquiry delivers — disclosure, participation, accountability, findings of fact, reforms and ensuring that these things never happen again — not on the speed with which it is brought to an end.

"A great deal of public money has already been spent and will have been wasted if no action is taken to ensure that nothing like this can ever happen again. There is already a good deal of mistrust of the police and of public inquiries. Limiting or closing the existing inquiry would only make this worse."
— Hilary Tilbury (Individual Consultation Respondent, 8 August 2026)

"Considering the amount that's already been spent on all the groundwork, the systems for gathering/ sorting/ storing evidence, the hearings that have already taken place, the staffing costs, the legal expenses, it would be a travesty, and a complete waste of public money, to just pull the plug now, before the inquiry's work is completed, leaving no recommendations for the future at all - which was supposed to be the entire point of this exercise."
—C Wilson (Core Participant in Person, September 2026)

7. Appendices

7.1 Methodology & Analytical Protocol

This appendix sets out how the consultation corpus was assembled, how it was divided into analytical tiers, how themes were coded and scored, and what the resulting findings can and cannot support. It is written so that a reader could reproduce or at least understand the analysis.

A total of 2,690 responses to the Home Office consultation (16 July – 20 September 2026) were received and indexed by the Campaign Opposing Police Surveillance. They comprise 2,654 submissions via the ucpi.uk online portal and 36 submissions sent directly by email. The portal submissions were analysed for divergence from the standard letter template (Appendix 7.3), showing 2,554 used the template with less than 10% variation. 100 showed 10% or greater variation; of these, 73 varied by less than 20% (typically the addition of a statement of standing, or a short personal paragraph) and 27 varied by 20% or more, containing substantive original content.

Tier	**Description**	**n**
1	Portal submissions using the template with <10% variation	**2,554**
2a	Portal submissions with 10–20% variation (minor personalisation)	**73**
2b	Portal submissions with ≥20% variation (substantively unique)	**27**
3	Direct email submissions (legal teams, NGOs, activist cohorts, Core Participants)	**36**
	Total	**2,690**

The 2,554 template letters and the 73 minor-variation letters (2,627 in total) are treated as evidence of public support for the core demands set out at Appendix 7.3. Because they reproduce a single text, counting them in thematic prevalence would measure campaign volume rather than convergence. They are therefore excluded from the prevalence calculations detailed in Appendix 7.2 and from the qualitative findings summarised in Parts 3–6 of the report.

The qualitative analysis is based on the unique-voice corpus of N = 63: the 27 substantively unique portal submissions (Tier 2b) and the 36 direct email submissions (Tier 3).

The 63 submissions are not a representative sample of public opinion, they represent a self-selected cohort of the primary stakeholders in the Undercover Policing Inquiry, drawn predominantly from non-state Core Participants, their recognised legal representatives, and civil-society organisations with a direct interest in the Inquiry's completion. The corpus was assembled solely from responses made via the ucpi.uk portal set up in response to the boycott of the Home Office questionnaire, and also written responses emailed directly to the Home Office with copies forwarded to the Campaign Opposing Police Surveillance. Any responses submitted via the Home Office questionnaire, or emailed directly to the Home Office portal without being copied to the campaign are not included.

The findings therefore support statements of the form: *"this argument was advanced, in these terms, by X of the 63 unique-voice submissions, and is internally coherent on its own terms."* They do not support statements about what consultees or the public as a whole thought. Where the report describes a position as widely held, that means widely held within the 63, and is stated as such. Where a finding is described as "unanimous" or "100%," the denominator is always N=63 and the term is used in that limited sense only.

Divergence thresholds and sensitivity

Divergence was measured by automated text comparison (first calculating similarity percentage across the whole text, then by a second-pass tokenised comparison of individual words). The thresholds were set empirically, seeking the sparse region between the dense cluster of template letters and the long tail of more varied or unique submissions. Some experimentation was done to see how small changes in the cut-off would reclassify responses. No attempt was made to test whether the findings would be sensitive to the choice of threshold.

Thematic coding proceeded in four structured stages:

Stage 1 — Inductive theme identification. AI was tasked with performing an unconstrained qualitative sweep across the 63 unique-voice submissions to identify recurring legal arguments, factual grievances, procedural critiques, and proposed reforms. No pre-determined theme categories were imposed.

Stage 2 — Positional prevalence scoring and directional stance matching. AI was then tasked with calculating thematic agreement metrics within the 63 unique-voice submissions. Coding evaluated directional intent, argument and sentiment, rather than exact phrasing matches. A theme was scored:

- **1 (Present)** only where the submission explicitly articulated and endorsed the specific legal position, policy demand, or factual claim defining that theme — for example, actively attributing inquiry delay to police secrecy litigation rather than merely mentioning that the inquiry has taken a long time; or demanding collective or group disclosure of archives, whether or not the words "group disclosure" were used;
- **0 (Absent)** where the theme was mentioned only vaguely or in passing, neutrally, without a clear stance, or not at all.

Stage 3 — Treatment of sub-cohort only majorities. Where a position falls below a simple majority across all 63 unique voices but was found to be unanimous or near-unanimous within a specific sub-cohort, the prevalence matrix details both the overall N=63 prevalence and the sub-cohort prevalence, and explains why the sub-cohort's concentration is material.

Stage 4 — Verbatim quote and evidence verification. This was a two phase process with AI asked to suggest Illustrative verbatim passages directly from the primary source texts. These were then checked by humans against the original submissions for accuracy of attribution and context. Quotations are drawn only from respondents who consented to their words being used; the quoted voices are therefore a subset of the 63. They are not random but illustrative, this means the quotations alone should not be read as representative, and prevalence claims rest on the matrix (Appendix 8.2), not on the quoted passages.

Analysis Limitations

1. **Coverage.** The corpus consists only of responses available for analysis. If responses were submitted to the Home Office online questionnaire then they have not been possible to include in this interim report. A Freedom of Information request to the Home Office asking about the volume and nature of those responses has been submitted and not yet responded to.
2. **Selection.** The 63 are essentially self-selected and drawn predominantly from non-state parties with a direct interest in the Inquiry's completion. Prevalence figures describe the corpus, not the public.
3. **Coding.** Coding was AI-assisted, and not manually verified.
4. **Consent.** Quotations are drawn from consenting respondents only, which further limited the illustrative material.
5. **Prevalence is not merit.** A high prevalence figure records that a position was widely advanced within the corpus. While no effort was made to express minority views, efforts were made to extract any dissenting or conflicting views, but none were identified.

7.2 Master Prevalence Matrix

This matrix records the prevalence of all overarching thematic positions, specific legal stances, and policy commitments across the \(N=63\) unique-voice corpus (comprising 27 customized individual narrative letters, 6 Category H/female survivor filings, 7 collective activist cohort submissions, 6 recognized legal representative/NGO filings, and 17 others).

Mass campaign endorsements (2,627 standard signatories) and minor-variation template letters (73 submissions with <20% textual variance) are excluded from the qualitative denominator to prevent double-counting and establish a rigorous baseline.

Position / Policy	Stance & Tier	Primary Cohort Drivers & Standing	Count	%
Rejection of Survey Design & Questionnaire Framing	Tier 1: Universal Non-State Consensus	Universal endorsement (100% Individual CPs, Cat H, Activist Cohorts, RLRs).	63 / 63	100%
Demand for Statutory Completion of Inquiry	Tier 1: Universal Non-State Consensus	Universal endorsement (100% Individual CPs, Cat H, Activist Cohorts, RLRs).	63 / 63	100%

Position / Policy	Stance & Tier	Primary Cohort Drivers & Standing	Count	%
Unconditional Withdrawal of Curtailment Proposals	Tier 1: Universal Non-State Consensus	Universal endorsement (100% Individual CPs, Cat H, Activist Cohorts, RLRs).	63 / 63	100%
Complete Rejection of Voluntary State Disclosure	Tier 1: Universal Non-State Consensus	Universal endorsement (100% Individual CPs, Cat H, Activist Cohorts, RLRs).	63 / 63	100%
Leadership Continuity (New Chair & Expert Panel)	Tier 1: Universal Non-State Consensus	Broad consensus (92.6% Individual CPs; 100% Cat H, Activist Cohorts, RLRs).	60 / 63	95.2%
Rejection of Cost/Delay Narrative	Tier 1: Universal Non-State Consensus	Broad consensus (92.6% Individual CPs; 100% Cat H, Activist Cohorts, RLRs).	58 / 63	92.1%
Enforcement of Disclosure Timetables & Candour	Tier 1: Universal Non-State Consensus	High overall endorsement (74.1% Individual CPs; 100% Cat H, Activist Cohorts, RLRs).	58 / 63	92.1%
Protecting Public Investment & Sunk Costs	Tier 1: Universal Non-State Consensus	High overall endorsement across individual CPs, legal fellows, and activist networks.	57 / 63	90.5%
"RIPA 2000 Safeguard" importance of T4 & T5	Tier 1: Universal Non-State Consensus	Unanimous in Cat H, Activist Cohorts, and RLRs (100%); 77.8% among Individual CPs.	55 / 63	87.3%
Inseparability of Tranches 4, 5, and Module 3	Tier 1: Universal Non-State Consensus	Unanimous in Cat H, Activist Cohorts, and RLRs (100%); 77.8% among Individual CPs.	55 / 63	87.3%
Accountability re Intimate Deceit & Misogyny	Tier 1: Universal Non-State Consensus	Cat H (100%), RLRs (100%), Activist Cohorts (100%); 70% Individual CPs.	52 / 63	82.5%
Importance of Live Hearings	Tier 1: Universal Non-State Consensus	Cat H (100%), RLRs (100%), Activist Cohorts (86%); 74% Individual CPs.	52 / 63	82.5%
Exposing Miscarriages of Justice / Agent Provocateurs	Tier 2: Major Cohort Consensus	Targeted Activist Cohorts (100%) RLRs / HJA (100%); 67% Individual CPs.	49 / 63	77.8%
Need for Recommendations & Statutory Duty of Candour	Tier 2: Major Cohort Consensus	Legal Campaign NGOs (100%) and Activist Cohorts (100%); 66.7% Individual CPs.	49 / 63	77.8%

Tier 1 Consensus (\(\ge 80%\) Prevalence): Denotes core consensus, principals, foundational legal, procedural, and governance demands shared universally across individual victims, legal teams, activist cohorts, and civil society organizations.

Tier 2 Consensus (\(60% - 79%\) Prevalence): Represents specialized thematic findings and procedural remedies that exhibit heavy concentration within specific cohort categories.

7.3 Full Text of the Standard Response Letter

The following text represents the complete, untruncated template letter submitted by 2,627 individual members of the public and core participants via email to the Home Office consultation team:

Dear Home Office,

I am writing in response to your consultation announced on the 16th July 2026 about the future of the Undercover Policing Inquiry (UCPI). I am concerned that the multiple choice questionnaire provided by the Home Office is too limited in scope. It does not offer options for responses that properly reflect the priorities of the survivors of the abuses being investigated by the UCPI.

In addition, I do not feel that the consultation provides sufficient information for me to be able to answer the questions even as posed. I am therefore replying by email to express my view.

The Inquiry has so far only considered one single undercover unit, the 'Special Demonstration Squad' (SDS), which was shut down by 2008. In the course of its investigations the Inquiry has seen and heard evidence of very serious misconduct, even criminality, by police officers. Some of this would never have been uncovered, had the police records not been shown to the people they were unaccountably spying on.

It is therefore vital that the SpyCops Inquiry continues as a Statutory Public Inquiry, fully funded to fulfil its legal Terms of Reference, including Tranche 4 (the National Public Order Intelligence Unit), Tranche 5 (other undercover policing operations) and Module 3 (recommendations for the future).

This consultation should be trauma informed and not result in survivors being subjected to any further delays.

Going forward, steps must be taken to ensure candour and openness from the state parties under investigation. There must be a clear process to ensure prompt disclosure of evidence to Inquiry Core Participants, and to prevent the excessive secrecy and deliberate delays by State CPs that have created the problems plaguing the Inquiry to date.

The Home Office must not bow to the obvious vested interests wanting to shut down the SpyCops Inquiry. It is vital that you listen to the demands of the survivors of abuse, misconduct and unlawful deployments of undercover police.

I confirm that I am over 18 years old and I ask the Home Office to take all of the matters above into account when considering the future of the Undercover Policing Inquiry.

7.4 Purpose and structure of the UCPI

The Undercover Policing Inquiry Terms of Reference can be accessed here: https://ucpi.org.uk/wp-content/uploads/2016/06/Terms-of-Reference.pdf

To manage the fifty-year scope of its investigations, the Inquiry established a three-module structure:

- **Module 1:** Examination of the deployment of undercover officers and the impact of their activities on individuals and targeted groups.
- **Module 2:** Examination of the management, oversight, authorization, and departmental governance of undercover policing (including senior police management, the Security Service, and the Home Office).
- **Module 3:** Examination of current undercover policing practices and recommendations for future legislation, policy, and operational governance.

To execute Modules 1 and 2, the Inquiry divided its investigations chronologically and by unit, resulting in five "tranches":

- **Tranche 1:** Special Demonstration Squad (SDS) deployments, management, and oversight (1968–1982).
- **Tranche 2:** SDS deployments, management, and oversight (1983–1992).
- **Tranche 3:** SDS deployments, management, and oversight (1993–2007).
- **Tranche 4:** National Public Order Intelligence Unit (NPOIU) deployments, management, and oversight (1999–2011).
- **Tranche 5:** All other undercover policing activity, including by regional English and Welsh police forces (1968–present).

7.5 History of Home Office Interference (FOI 2024/04432)

The following digest summarizes the five confidential letters exchanged between Home Secretaries Suella Braverman KC MP, James Cleverly MP, and UCPI Chair Sir John Mitting between October 2023 and January 2024, released under Freedom of Information Request FOI2024/04432 to Dr. Dónal O'Driscoll on 28 October 2024 and cited extensively in consultation submissions:

Letter from Home Secretary Suella Braverman KC MP to UCPI Chair Sir John Mitting (13 October 2023):
Home Secretary Suella Braverman wrote to Sir John Mitting proposing formal amendments to the Inquiry's Terms of Reference (TOR) to force a final report delivery date no later than end-2026. The proposed draft TOR attached to her letter deleted the requirement to examine the "impact" of undercover policing on individuals, introduced a compulsory "sampling approach" to undercover deployments, and restricted recommendations strictly to areas where "further opportunities for change" existed. Braverman explicitly noted that these changes were presented *"ahead of any wider public consultation"*.

Letter from UCPI Chair Sir John Mitting to Home Secretary Suella Braverman KC MP (19 October 2023):
Sir John Mitting robustly rejected the proposed deletion of "impact" and the imposition of a "sampling approach". Mitting warned: *"My concern is that this proposed change… will cause great concern to non-state core participants and is likely to cause a large number of them to demand… hearings and, if they do not receive a positive response… litigate. If the number is large, it will derail the inquiry."* Mitting rejected a statutory budget cap, proposing instead that he publish a formal commitment letter setting a target reporting date of end-2026 at an estimated cost cap of £139 million.

Letter from Home Secretary James Cleverly MP to UCPI Chair Sir John Mitting (22 December 2023):
Following Suella Braverman's departure, incoming Home Secretary James Cleverly wrote to Sir John Mitting following up on the October meetings. Cleverly welcomed Mitting's proposal to issue a public commitment letter targeting end-2026 completion at a forecast cost cap of £138.5 million. Cleverly emphasized that *"your commitment to your delivery timeframe is important to everyone impacted, the public, and Government"*, and confirmed officials were reviewing progress under an "*enhanced sponsorship"* framework.

Letter from UCPI Chair Sir John Mitting to Home Secretary James Cleverly MP (3 January 2024):

Sir John Mitting confirmed he would write a formal commitment letter targeting publication by end-2026 at a total cost not exceeding £139.1 million. However, Mitting expressed sharp concern regarding Cleverly's suggestion of further funding constraints. Mitting warned: *"Completion of the Inquiry by the due date is dependent on its expenditure being met as it is incurred… I am unwilling to consider any avoidable postponement… the Inquiry has now reached a stage at which the cost of achieving what it must do to fulfil the terms of reference can be estimated with reasonable accuracy and the scope for 'efficiency' savings is negligible. Hence the somewhat stark terms of this letter."*

Letter from UCPI Chair Sir John Mitting to Home Secretary James Cleverly MP (25 January 2024):

Sir John Mitting formally confirmed the Inquiry's commitment to conclude its work by producing a final report by end-2026 at a total cost not exceeding £139.1 million, subject to two explicit conditions: that no unforeseen delays occur and that annual funding requests are met in full. Mitting attached a revised delivery schedule setting Tranche 4 evidence hearings for October 2025, Tranche 5 / Module 3 hearings for March 2026, and final report publication for December 2026.

7.6 Gisted Summary of Home Office Consultation Questionnaire

The following summary outlines the structure, framing, and exact question wording of the official online questionnaire issued by the Home Office, launched 16 July 2026 (closing 20 August 2026, later extended to 20 September 2026).

Section 1 - Preamble & Privacy Notice: States that the consultation invites views to inform ministerial decisions on addressing remaining work beyond Tranches 1–3. Clarifies that the survey is not a call for new evidence or reopening individual cases.

Section 2 – Respondent Identification (Questions 1–3): Captures whether the respondent is an individual or representing an organisation, their stakeholder category (e.g. member of public, Core Participant, legal representative, police officer, trade union, civil society group), and capacity (personal vs professional).

Question 4 – Rating Relative Importance of Remaining Topics:
Wording: "Please rate the relative importance of the remaining topics from 1 (not at all important) to 5 (very important)."
Options Listed: Tranche 4 (NPOIU 1999–2011); Tranche 5 (Other undercover policing 1968–present); Module 3 (Current and future practices).

Question 5 – Rating Outcomes & Compulsory Trade-Offs:
Wording: "In designing the way forward, rate the importance of the following outcomes (Select on scale of 1 to 5, where 1 is not at all important to 5 very important, or don't know). (Later adding a column for "Prefer not to say")
Seven Listed Outcomes:

1. Establishing findings of fact (ascertaining what happened based on evidence)
2. Disclosure of relevant documentation to victims
3. Delivering recommendations for reform for undercover policing in the future
4. Delivering public value for money by prioritising concluding the Inquiry (As of end-March 2026, Inquiry spent £137m)
5. Delivery of timely conclusions by prioritising concluding the Inquiry
6. Providing opportunities for those impacted to share experiences to inform practice
7. Public accountability for those responsible for bad practice in the past

Question 6 – Rating Alternative Non-Statutory / Narrower Options:

Wording: "If the Inquiry does not continue in its current form, how effective do you

think the following approaches would be in addressing the remaining issues? (Rate on 1 to 5 scale).” Three Options Listed:

1. A statutory inquiry with a narrower, clearly defined (and potentially time-limited) remit.
2. An independent non-statutory inquiry or review (noting powers under the Public Office (Accountability) Bill / Hillsborough Law).
3. Disclosure of material held by relevant organisations to affected individuals (voluntary agency processing without inquiry-style testing of evidence).

Question 7 - optional reasons for above answers Free-text box max 3**00 words**.

Questions 8–11 – Permissions & Follow-Up: Consent to quote anonymously (Q8), consent to follow-up research contact within 12 months (Q9), additional short description box (Q10), and optional contact details (Q11).

Questions 12–14 – Voluntary Demographics: Age / sex and gender identity

7.7 Labour party-line emails from MPs to constituents regarding the consultation

Below is a copy of an email received by people who engaged in the consultation and had also written to their MPs asking them for help in ensuring the Inquiry continues. These emails were received from a number of different Labour MPs, all essentially identical although some contained a few minor differences in the closing sentences. It is evident that a standard text was provided to Labour MPs, a party line, and the content appears to support the accusations of there having been a predetermined outcome in mind before the consultation was launched.

The text speaks of looking forward to hearing "**how the Inquiry's remaining areas of work will be prioritised and delivered"**, mirroring the consultations framing around ranking remaining areas of the remaining elements of the Inquiry and prioritising those considered most important rather than fulfilling the statutory inquiry as constituted.

Dear [constituent name removed],

Thank you for contacting me.

I appreciate the concerns you raise about the horrific failings in undercover policing. I strongly believe we must deliver justice for victims and hold those responsible to account.

The Undercover Policing Inquiry has been ongoing for more than a decade and its investigations are broad, examining the role of undercover policing in the prevention and detection of crime, as well as the effect of undercover operations on individuals and the public. It has spent over £138 million, yet many of those affected are still awaiting the conclusions they have long been promised. While it has made progress, I am aware that Ministers are concerned about the length and cost of the Inquiry and the delay in providing outcomes for victims.

Public inquiries play an important role in delivering answers, ensuring accountability and making recommendations for the future. However, they must also be able to deliver these outcomes within a reasonable timeframe. For that reason, I welcome the Government's decision to seek the views of those affected about the future of the Inquiry. The Home Office held a consultation which invited views on the structure, scope and format of the work needed to conclude the Inquiry's investigations. This consultation closed on 20 September 2026.

As part of this, I am glad that the Government considered any potential direct or indirect discrimination arising from the consultation process. It was right to take steps to make the process as accessible as possible, allowing people to respond either through an online survey or by email.

Ministers have also confirmed that the impact on equality will be considered in any decisions concerning the future of the Inquiry. The Government plans to announce its decision, informed by this consultation, in autumn 2026.

I believe that we must always consider fairness to victims and those who were affected by undercover policing, and I look forward to hearing how the Inquiry's remaining areas of work will be prioritised and delivered.

Thank you once again for contacting me about this important issue.

Yours sincerely,

[name of MP removed but can be provided on appropriate request]

Minor variations in text were found in some emails. For example:

… *I believe that we must always consider fairness to victims and those who were affected by undercover policing, and I look forward to hearing how the Inquiry's remaining areas of work will be prioritised and delivered.* ***While I was unable to attend the drop in you highlighted, please rest assured that I will be following this matter closely.***

I am grateful to you *for contacting me about this important issue.*

Yours sincerely,

[name of MP removed but can be provided on appropriate request]

7.8: Profiles of Collective Cohorts and Participant Representation

This section explains who the respondents to this consultation analysis are. It profiles the collective cohorts whose submissions inform the report, so that readers can assess the basis on which each cohort's evidence rests. Some of these cohorts are pre-existing organisations or movements with their own identities and histories. Others are groups of Core Participants assembled for the purposes of the Inquiry, with no existence outside it. Where a cohort has described itself in its own words, that description carries the characterisation. Where it has not, the profile says so.

Submissions were also made by interested members of the public; legal representatives and research groups, including Pete Weatherby KC, Hodge Jones & Allen (representing over 100 Core Participants), Birnberg Peirce, and Doughty Street Chambers; Police Spies Out of Lives; Netpol; the Undercover Research Group; Public Interest Research Group Cymru; and the Non-Police Non-State Core Participants' Co-ordinated Group.

The Ratcliffe Cohort is an Inquiry construct rather than a pre-existing organisation, formed to represent the individuals affected by the April 2009 pre-emptive arrests at the Iona School ahead of a planned action at Ratcliffe-on-Soar power station. The 113 people arrested, and the 20 activists whose convictions were quashed by the Court of Appeal in R v Barkshire [2011] EWCA Crim 1885. The exposure of NPOIU officer Mark Kennedy was the catalyst for the collapse of the trials and the establishment of the Inquiry, which is why the cohort argues that ending the Inquiry before Tranche 4 would mean it never examines the unit that caused it to be set up. The cohort points out that it is the largest single cohort of Core Participants in the Inquiry.

The Camp for Climate Action was established in 2005 and functions both as a movement and as a formal cohort for the Inquiry. In its own words, it "aimed to raise public awareness of the climate crisis, encourage direct action against significant greenhouse gas point-sources, and live out sustainable, democratic alternatives," and it describes itself as a horizontal open structure rather than a conventional organisation. The cohort represents at least 27 Core Participants who compiled a 72-page joint witness statement covering the camps at Drax, Kingsnorth, Bishopsgate and Ratcliffe-on-Soar between 2006 and 2010. It argues that Tranche 4 is necessary to establish how NPOIU officers influenced protest strategies, facilitated arrests, shared intelligence with private energy companies, and fed information used in civil injunctions and blacklisting.

Earth First! has been active in the UK since the early 1990s, and in its own words has "never been a membership organisation, or a formal campaign group," but is "a grassroots network, a collective idea, and a convenient banner for autonomous local groups and individuals who share a commitment to non-violent direct action to defend the natural ecosystems of this planet." The submission was signed by 15 representative activists on behalf of a movement estimated at 500 to 1,000 people at its height. The network was targeted by at least eight identified undercover officers across SDS and NPOIU deployments, resulting in at least 10 Category H Core Participants, including nine women deceived into intimate relationships, and over 200 campaigners placed on construction industry blacklists.

The Genetic Engineering Network was formed in early 1997 and formally designated as a group Core Participant by the Inquiry. It describes itself as having "served as an info-sharing and networking hub for a diverse coalition of environmental groups, organic farmers, local campaigns, and national organizations campaigning against the introduction of genetically modified organisms into the UK food chain." Its targeting spans both SDS and NPOIU deployments, which the cohort argues gives the Inquiry a direct comparison of political policing before and after the enactment of statutory oversight, and makes Tranche 4 essential to testing the validity of modern covert authorisations.

The W.O.M.B.L.E.S. were active in the early 2000s. It does not have core participant status although individuals in the group were designated as core participants. In its own words, it was "a loosely aligned, anti-capitalist, and anti-globalisation network" in which "there was no fixed 'membership' and no leadership," and whose participants were "readily distinguishable at protests by our tactical dress code: padded white overalls and helmets." The network was active across May Day protests, the DSEi arms fair and international summits. It was involved in establishing six community social centres, and was targeted by at least four identified undercover officers. It argues that Tranche 4 must be completed to examine how cross-unit tradecraft and provocateur tactics persisted under RIPA 2000.

The Social Centre Networks Cohort are a group of individuals who were involved in the UK social centres network between approximately 1993 and 2014, who formed a joint witness group for the purpose of the Inquiry. In its own words, its spaces "hosted mutual aid projects, community kitchens, refugee language classes, free libraries, and meeting rooms for grassroots campaigns, local residents, trade unions, and environmental groups." The submission was signed by eight representative activists on behalf of 11 physical spaces

targeted by undercover units, including the Sumac Centre in Nottingham, The Common Place in Leeds, rampART, LARC, the Oxford Action Resource Centre and the Cowley Club in Brighton. By treating physical social centres as 'gateway targets' to monitor entire communities, undercover operations executed a collective intrusion. Individual disclosure atomises this harm, masking the upper-level operational mandates that only a full statutory Inquiry across Tranches 4 and 5 can expose.

Reclaim the Streets has group Core Participant status, and describes itself as having been "a decentralized network with active groups and mobilizations extending far beyond London." In June 2025, 10 active organisers compiled a 275-page collective witness statement detailing infiltration by at least five identified undercover officers spanning both SDS and NPOIU deployments. The cohort argues that Tranche 4 is required to evaluate how RTS infiltration moved from SDS legacy methods into NPOIU statutory operations under RIPA 2000, and to examine operational overreach including the encouragement of violent escalation and the deception of women into intimate relationships.

Aldermaston Women's Peace Camp (est. 1985) opposed construction work for a new generation of nuclear weapons through local and national advocacy and non-violent direct action.. From 2003-4, "Lynne Watson" an NPOIU undercover, infiltrated AWPC; she subsequently contacted women & remained on mailing lists. In September 2026 lawyers acting for Tranche 4 NSCPs, wrote to the UCPI, "*There are a significant number of groups and CPs who have waited patiently for disclosure… This includes: ……. Aldermaston CPs".* Four women from AWPC are designated Core Participant in the Inquiry.