

**A Report Relating To The Handling
And Closure By The Metropolitan
Police Service Of Crime Reference
Number 6029679/21**

By Ian Clayton

Published July 2026

Foreword

This report comprises a four-part evidential submission concerning Metropolitan Police Crime Reference Number CRN 6029679/21.

Its purpose is not to determine criminal liability, nor to invite predetermined conclusions regarding the conduct of any individual or institution. Those are matters reserved to those exercising lawful investigative and judicial functions.

The purpose of this report is more limited, but no less important. It is to reconstruct, as accurately as the available documentary record permits, the circumstances surrounding the reporting, handling and closure of CRN 6029679/21, and to identify the legal and evidential framework within which those events occurred.

The report has been compiled from contemporaneous documents, subsequently disclosed material, published legal authorities and official public records. Wherever possible, primary source material has been preferred. Where questions remain unresolved, they are identified as such. No adverse inference is invited merely because a document is incomplete or because further material may exist which has not yet entered the public domain.

The four parts are intended to be read as a single, cumulative evidential reconstruction.

Part One reconstructs the chronology of events. It seeks to establish, by reference to the documentary record, what occurred, when it occurred and how the handling of CRN 6029679/21 developed over time.

Part Two examines the wider operational and constitutional context within which those events took place. It considers the national policing environment, including the structures, policies and command arrangements operating during the relevant period, insofar as they assist in understanding the documentary record.

Part Three identifies the governing legal framework. It examines the statutory provisions, principles of criminal investigation, public law, disclosure obligations and related authorities relevant to the handling of the report. Its purpose is not to advocate for any particular conclusion, but to provide the legal context against which the documentary record may properly be assessed.

Part Four examines the Metropolitan Police closure letter dated 21 February 2022. It considers whether that decision document accurately described the complaint, adequately engaged with the evidential material presented, and sufficiently explained the

reasoning upon which the decision to close CRN 6029679/21 was based.

The reader will observe that the report does not proceed by assertion. Its methodology is one of documentary comparison. Where contemporaneous records appear consistent, they are identified as such. Where differences, omissions or unanswered questions emerge, they are likewise identified. The objective throughout is to distinguish clearly between established fact, documentary evidence, legal analysis and matters that remain open to further investigation.

No report of this nature can determine the ultimate merits of the allegations originally reported on 20 December 2021. Nor does it seek to do so. Its purpose is to assist those now charged with considering the matter by presenting the documentary record in a coherent, structured and legally informed manner, thereby enabling any further consideration to proceed upon the fullest evidential foundation presently available.

Ultimately, the question is not whether this report proves that a particular conclusion should be reached. The question is whether the documentary record, viewed as a whole, gives rise to matters that properly merit further consideration.

That question is respectfully left to those entrusted with the responsibilities of investigation and, if necessary, judicial determination.

Ian Clayton

25 July 2026

PART No.1

EVIDENCE - CRN 6029679/21

A Forensic Reconstruction of the Documentary Record

**Relating to the period
20 December 2021 to 21 February 2022**

Compiled by

Ian Clayton - Lead Investigator, Ethical Approach UK

EVENT 1

20 December 2021

Reporting of Alleged Criminal Offences and Creation of CRN 6029679/21

Primary Documents

Metropolitan Police CRIS/SAR Disclosure (CRN 6029679/21) –
General Information.

Link:

https://ethicalapproach.co.uk/SAR_CR6029679_21PDF_260325_134829.pdf

Contemporaneous Record

At approximately 17:57 on 20 December 2021, the Metropolitan Police recorded CRN 6029679/21 following the attendance of four informants at Hammersmith Police Station. The CRIS record identifies the report as having been made in person at the police station and records the report as relating to matters associated with COVID-19.

The investigating officer's notes record:

"On the 20/12/2021 4 informants visited the Hammersmith Front office... with evidence to state that a number of roles within the office of parliament and in other organisations have suppressed

information regarding the severity of the health implications from the COVID 19 vaccine.”

The record continues:

"The informants want this report to be progressed through to the relevant people as soon as possible... They have a large amount of evidence regarding this matter on memory sticks and in other documents against the suspects regarding the allegations."

A further entry records that the informants identified individuals whom they considered principally responsible for the matters alleged, before recording additional contextual information under the HAVES framework. The officer noted:

"I think that the report may be taken further if the VIWs do not get the desired response or investigation from the police."

Subsequently Discovered Material

The later-disclosed CRIS/SAR record additionally establishes that:

- the report was allocated a unique Crime Reference Number (6029679/21);
- the report was subsequently allocated within Metropolitan Police systems;
- the report was later marked with a Screening Decision: IN; and
- the CRIS record formed the principal operational record for subsequent handling of the matter.

These later-disclosed system fields illuminate the significance of the events recorded on 20 December 2021, although they were not themselves available to the informants at that time.

Documentary Significance

This event marks the commencement of the documentary chronology.

The contemporaneous Metropolitan Police record establishes that:

- four informants attended Hammersmith Police Station;
- a crime report was created;
- allegations were recorded;
- the attending officer recorded that supporting material existed in documentary form and on memory sticks; and
- the report entered Metropolitan Police crime recording systems under CRN 6029679/21.

No evaluative conclusion is drawn at this stage. This event simply establishes the documentary starting point from which the subsequent chronology proceeds.

Cross-References

Event 2 - Supervisory review dated 21 December 2021.

Event 3 - Screening and transfer to CID dated 22 December 2021.

Event 4 - Allocation history and OIC changes.

Outstanding Evidential Questions

- What documentary material accompanied the original report on 20 December 2021?
- What immediate actions were taken within Metropolitan Police systems following creation of CRN 6029679/21?
- What records exist of the material presented by the informants at Hammersmith Police Station?

EVENT 2

21 December 2021

Initial Supervisory Review

Primary Documents

Metropolitan Police CRIS/SAR Disclosure (CRN 6029679/21) – General Information.

Link:

https://ethicalapproach.co.uk/SAR_CR6029679_21PDF_260325_134829.pdf

Contemporaneous Record

At 06:07 on 21 December 2021, Police Sergeant S. Hall recorded the first documented supervisory assessment of CRN 6029679/21.

The supervisory entry states:

"I have reviewed this report and it appears to me to constitute a protest rather than a legitimate allegation of crime."

The same entry continues:

"There is no description of any evidence offered by the informants."

The supervisory review was completed approximately twelve hours after the report had been created.

Documentary Context

The chronology records that the original investigation entry made on 20 December 2021 had already stated:

"They have a large amount of evidence regarding this matter on memory sticks and in other documents against the suspects regarding the allegations."

The chronology simply records both contemporaneous entries as they appear in the Metropolitan Police record.

Subsequently Discovered Material

The later-disclosed supervision history records that this supervisory review formed part of the continuing management of CRN 6029679/21 and was subsequently preserved within the CRIS record.

Documentary Significance

This is the first recorded supervisory assessment contained within the Metropolitan Police record.

It documents:

- the first supervisory characterisation of the report;
- the supervisor's assessment of the nature of the allegations; and
- the supervisor's recorded observation regarding the description of evidential material.

The chronology records this assessment without seeking to determine whether it was correct.

Cross-References

Event 1 - Original report and investigating officer's description of evidential material.

Event 3 - Screening decision recorded on 22 December 2021.

Event 4 - Transfer to CID and subsequent allocation.

Outstanding Evidential Questions

- What material did the supervising officer review before making this assessment?
- Were the memory sticks and accompanying documents available to the supervising officer at the time of the review?
- What records exist showing how the supervisory assessment informed subsequent decisions taken on 22 December 2021?

Documents Required to Complete the Evidential Record

- Any supervisory notebook or electronic review associated with the entry.
- Any internal communication generated following the supervisory assessment.
- Any record identifying the evidential material available to the supervising officer on 21 December 2021.

- Any CAD or Crime Management System records linked to this supervisory review.

EVENT 3

22 December 2021

Screening Decision, CID Transfer and Allocation

Primary Documents

Metropolitan Police CRIS/SAR Disclosure (CRN 6029679/21) – General Information.

Link:

https://ethicalapproach.co.uk/SAR_CR6029679_21PDF_260325_134829.pdf

Contemporaneous Record

The Metropolitan Police CRIS record contains a sequence of operational entries made during 22 December 2021.

At 12:50, the record states:

"Screened In"

At 12:53, a further entry records:

"Classification confirmed"

At 13:02, the record notes:

"OIC Changed"

At 16:01, a further change of Officer in the Case is recorded.

At 16:10, Detective Sergeant O. Mallett entered the following supervisory note:

"This has been transferred to the CID by the CMS."

The same entry continues:

"There is scant detail on this. I have seen that the informants have posted about this report on Twitter stating that they spent 6 hours making this report."

At 16:11, a further change of Officer in the Case was recorded.

Subsequently Discovered Material

The General Information section of the later-disclosed CRIS record records:

“Screening Decision: IN”

The Supervision section further records:

"Crime screened 'in' for further investigation."

Reason:

"92 Proportionate Investigation."

The allocation history additionally records successive changes in responsibility before eventual allocation to AW CID.

Documentary Significance

The contemporaneous record evidences a sequence of operational decisions occurring on a single day, including:

- a recorded screening decision;
- confirmation of classification;
- multiple changes in the Officer in the Case;
- transfer of the matter to CID by Crime Management Services; and
- supervisory oversight by a Detective Sergeant.

The later-disclosed system records additionally record that the matter was screened *IN* and that the recorded reason for screening was *92 Proportionate Investigation*.

No conclusion is drawn within this chronology as to the legal significance of those entries. They are presented as part of the contemporaneous documentary record.

Cross-References

Event 2 - Initial supervisory assessment.

Event 4 - Formal allocation to Detective Constable Hussey.

Event 5 - 5 January 2022 entries and subsequent supervision.

Outstanding Evidential Questions

- What criteria were applied in recording the screening decision as "IN"?
- What operational consequence followed the transfer to CID recorded on 22 December 2021?
- What prompted the successive changes in the Officer in the Case recorded throughout that day?

- What documents informed Detective Sergeant Mallett's supervisory assessment?

Documents Required to Complete the Evidential Record

- Crime Management Services screening documentation.
- CID allocation records.
- Detective Sergeant Mallett's supervisory records.
- Any electronic tasking or allocation logs generated on 22 December 2021.
- Any records explaining the reason for successive OIC changes.

EVENT 4

27 to 29 December 2021

Allocation to CID and Detective Officer

Primary Documents

Metropolitan Police CRIS/SAR Disclosure (CRN 6029679/21) - General Information.

Link:

https://ethicalapproach.co.uk/SAR_CR6029679_21PDF_260325_134829.pdf

Contemporaneous Record

Following the transfer of CRN 6029679/21 to the Criminal Investigation Department on 22 December 2021, the Metropolitan Police record documents a sequence of allocation decisions.

The allocation history records that responsibility passed through a number of officers before allocation within AW CID.

The General Information section records:

- Investigating Officer's Rank: Detective Constable
- Surname: Hussey
- Station/Branch: AWCID
- Allocated Date/Time: 29 December 2021 - 18:11
- Allocation Noted: 4 January 2022 - 08:51

The allocation history additionally records previous allocations on 22 December 2021 before the eventual allocation to Detective Constable Hussey.

Subsequently Discovered Material

The later-disclosed CRIS record confirms that Detective Constable Hussey remained the recorded Investigating Officer during the period covered by this bundle.

The same disclosure records continuing detective supervision by Detective Sergeant C. E. Chiltern, including supervisory entries during January and February 2022.

Documentary Significance

This event records the transition of responsibility from initial crime recording and supervisory assessment to formal allocation within the Criminal Investigation Department.

The Metropolitan Police system records:

- allocation to CID;
- appointment of a Detective Constable as Investigating Officer;
- continuing detective supervision; and
- the recording of allocation within the CRIS system.

The chronology records these operational entries without drawing conclusions as to the nature or extent of any investigative activity.

Cross-References

Event 3 - Screening decision, transfer to CID and OIC changes.

Event 5 - 5 January 2022 entries, including the "*victimless allegation*" entry and Superintendent Jon Simpson's reference to the "*relevant investigation team*."

Event 13 - Later CRIS entries recording outcome and supervision.

Outstanding Evidential Questions

- Upon what basis was Detective Constable Hussey selected as the Investigating Officer?
- What instructions accompanied the allocation to CID?
- What actions, if any, were expected of the Investigating Officer following allocation?
- What records exist documenting work undertaken between allocation on 29 December 2021 and the subsequent entries of 5 January 2022?

Documents Required to Complete the Evidential Record

- Detective Constable Hussey's investigation log or policy file (if one exists).
- CID allocation documentation.
- Any tasking instructions issued with the allocation.
- Detective Sergeant Chiltern's supervisory policy entries for the relevant period.

- Any correspondence generated between CID and Crime Management Services concerning the allocation.

EVENT 5A

5 January 2022 - No Crime Entry

Primary Documents

Metropolitan Police CRIS/SAR Disclosure (CRN 6029679/21) - General Information.

Link:

https://ethicalapproach.co.uk/SAR_CR6029679_21PDF_260325_134829.pdf

Contemporaneous Record

The Metropolitan Police CRIS record shows that at 11:47 on 5 January 2022 the classification was altered to:

“Outcome 99 - No Crime”

The recorded reason states:

"Victimless allegation."

The classification history records that this became the current status on that date.

Subsequently Discovered Material

The later-disclosed CRIS record demonstrates that this entry was retained within the permanent crime record.

Subsequent documents within this chronology illuminate activity occurring after this entry.

Documentary Significance

This event records the first formal "*No Crime*" classification appearing within the Metropolitan Police operational record.

The chronology records the entry exactly as recorded.

Cross References

Event 4

Event 5B

Event 6

Outstanding Evidential Questions

- Upon what information was the "*Victimless allegation*" classification based?
- Which officer made the recommendation leading to Outcome 99?
- What documentation supported that decision?

EVENT 5B

5 January 2022 - Commissioner's Staff Officer

Primary Documents

Email from Superintendent Jon Simpson.

Link:

https://ethicalapproach.co.uk/crime_reference_number_6029679_2_1_260108_123527.pdf

Contemporaneous Record

On 5 January 2022, Superintendent Jon Simpson, Staff Officer to the Commissioner of the Metropolitan Police then Cressida Dick), replied to correspondence concerning CRN 6029679/21.

He stated:

"Many thanks for your email which has been forwarded to the relevant investigation team."

The email was sent in response to correspondence requesting that additional material relating to CRN 6029679/21 be provided to those dealing with the report.

Documentary Significance

The chronology records that a Superintendent serving as Staff Officer to the Commissioner referred expressly to:

"the relevant investigation team."

No conclusion is drawn as to the identity or function of that team.

Cross References

Event 4.

Event 7.

EVENT 5C

5 January 2022 - Continuing Supervision

Primary Documents

CRIS Supervision History.

Link:

https://ethicalapproach.co.uk/SAR_CR6029679_21PDF_260325_134829.pdf

Contemporaneous Record

The later-disclosed supervision history records continuing detective supervision on 5 January 2022, including supervision by Detective Sergeant C. E. Chiltern.

Documentary Significance

The chronology records continuing supervisory activity occurring on the same day as:

- the Outcome 99 entry;
- the Commissioner's Staff Officer referring correspondence to the *"relevant investigation team"*;
- and continuing CID allocation.

Cross References

Events 4 to 7.

EVENT SERIES 6

12 January 2022

Documentary Events of 12 January 2022

Event 6A

Metropolitan Police Internal Confirmation of "*No Crime*"

Primary Documents

CRIS/SAR

Link:

https://ethicalapproach.co.uk/SAR_CR6029679_21PDF_260325_134829.pdf

Contemporaneous Record

At Time: 11:37 PC S.D. Turner records:

"No crime confirmed."

This represents the internal confirmation of the "*No Crime*" classification previously entered on 5 January 2022.

Documentary Significance

This entry forms part of the internal CRIS record immediately preceding the external communication sent later that day.

Cross References

Event 5A

Event 6B

Event 6B

Metropolitan Police External

Time: 08:43

Primary Documents

Crime Management Services email.

Link:

https://ethicalapproach.co.uk/cms_email_12012022.jpg

Contemporaneous Record

At 08:43, Crime Management Services informed a public enquirer:

"This report has been closed and will not be investigated any further."

This represents a Metropolitan Police formal external communication concerning CRN 6029679/21 on 12 January 2022.

Documentary Significance

This is the first contemporaneous document communicating externally that the report had been closed and that no further investigation would occur.

No conclusion is drawn as to its relationship with other contemporaneous documents.

Cross References

Event 6A.

Event 6C.

Event 7A.

Event 6C

NPCC Chief Constables' Council

Primary Documents

CCC Minutes.

Link:

https://ethicalapproach.co.uk/14_january_2022_260406_032139.pdf

Contemporaneous Record

Minutes of the NPCC Chief Constables' Council record discussion concerning the Metropolitan Police crime report.

The minutes record:

"A crime report was made to the Met..."

The minutes continue:

"The final assessment should be complete next week..."

The agreed action records:

"Op Talla team to share the results of the peer review assessment relating to the Crime Report submitted to the Met Police with all Chiefs."

Documentary Significance

This contemporaneous document records consideration of the Metropolitan Police crime report at Chief Constables' Council level.

The chronology simply records the documentary sequence.

Cross References

Event 6B.

Event 7A.

Event 7B.

Event 6D

Continuing Detective Supervision

Primary Documents

CRIS Supervision History.

Link:

https://ethicalapproach.co.uk/SAR_CR6029679_21PDF_260325_134829.pdf

Contemporaneous Record

The later-disclosed CRIS record records continuing supervision by Detective Sergeant C.E. Chiltern on 13 January 2022, immediately following the events of 12 January.

Documentary Significance

The chronology records continuing supervisory activity following the external closure communication of 12 January to a public enquirer.

EVENT SERIES 7

18 January 2022

Documentary Events of 18 January 2022

Event 7A

Metropolitan Police Recorded Telephone Conversation

Primary Documents

Audio recording of telephone conversation.

Link:

https://ethicalapproach.co.uk/MetropolitanPolice_investigation_Confirmation_audio.m4a

Contemporaneous Record

On 18 January 2022, a recorded telephone call was made to the Metropolitan Police concerning CRN 6029679/21.

After checking the crime reference number, the Metropolitan Police call handler stated:

"It's an open crime report."

The call handler further stated:

"It's still open..."

She then continued:

"It's going to be under investigation for some time..."

Finally, she stated:

"It's all still open and still being looked at."

The caller explained that further material was intended to be linked to CRN 6029679/21.

Documentary Significance

This document records the status of CRN 6029679/21 as described by a Metropolitan Police employee during a contemporaneous telephone conversation.

The chronology records the conversation exactly as documented.

Cross References

Event 6B.

Event 7B.

Event 7C.

Outstanding Evidential Questions

- What information was available to the call handler when the CRN was checked?

- What Metropolitan Police system was consulted during the call?
- Did that system display the status of CRN 6029679/21 at the time of the enquiry?

Event 7B

National Operation Talla Communication

Primary Documents

Communication issued by ACC Owen Weatherill - Operation Talla Silver Commander and National Mobilisation Coordinator.

Link:

https://ethicalapproach.co.uk/communication_to_police_chiefs_18012022.pdf

Contemporaneous Record

On 18 January 2022, ACC Owen Weatherill circulated a national communication to Chief Constables and Force Duty Gold Officers concerning the crime report made to the Metropolitan Police on 20 December 2021.

The communication stated:

"I can confirm that currently NO investigation has been initiated."

The document continued:

"Following receipt of several 1000 pages of generic documentation a 'review process' of the content is having to be conducted."

It further recorded:

"Officer's have been tasked with reviewing the documents."

The communication also addressed a recorded telephone conversation, stating:

"The call handler misspoke."

Documentary Significance

This document evidences a contemporaneous national communication concerning CRN 6029679/21 issued by the Operation Talla Silver Commander.

The chronology records the communication without drawing conclusions regarding the relationship between it and other contemporaneous records.

Cross References

Event 6C.

Event 7A.

Event 8A.

Outstanding Evidential Questions

- What review process is referred to in the communication?
- Which officers had been tasked with reviewing the documents?
- Upon what information was the statement "*NO investigation has been initiated*" based?
- Who authorised the national communication?

Event 7C

Metropolitan Police Operational Record

Primary Documents

CRIS/SAR Supervision History.

Link:

https://ethicalapproach.co.uk/SAR_CR6029679_21PDF_260325_134829.pdf

Contemporaneous Record

The Metropolitan Police operational record demonstrates that CRN 6029679/21 remained allocated within CID and subject to continuing detective supervision during this period.

Documentary Significance

This event provides the operational context in which the contemporaneous communications of 18 January 2022 occurred.

Cross References

Event 4.

Event 6.

Event 8.

Documentary Observation

The chronology for 18 January 2022 contains three distinct contemporaneous records:

- A recorded Metropolitan Police telephone conversation concerning the status of CRN 6029679/21.
- A national communication issued by the Operation Talla Silver Commander concerning the same crime report.
- The Metropolitan Police operational record relating to the handling and supervision of CRN 6029679/21.

These documents are presented together because they relate to the same date and the same crime report.

No conclusion is drawn within this chronology as to how those contemporaneous records should be reconciled. Their significance falls to be considered by the investigating officer in the context of the wider documentary record.

EVENT SERIES 8

25 January 2022 to 21 February 2022

**The Documentary Progression to the Closure Letter
Event 8A**

25 January 2022

**Police Scotland Operational Directive (Speirs
Directive)**

Primary Documents

Police Scotland Operational Directive dated 25 January 2022.

Link:

https://ethicalapproach.co.uk/FOI_25_0673.pdf

Contemporaneous Record

On 25 January 2022, Assistant Chief Constable Alan Speirs, Operation Talla Silver Commander for Police Scotland, issued an operational directive to Police Scotland officers concerning reports associated with COVID-19 vaccination activity.

The directive expressly referred to the Metropolitan Police crime report made on 20 December 2021, recording that the Metropolitan

Police had received the complaint, issued a crime reference number, and was reviewing the submitted material. It further stated the Metropolitan Police position that nothing had been found to suggest offences or grounds for an investigation and instructed officers how to respond to similar approaches from members of the public.

Subsequently Discovered Material

Police Scotland later confirmed through FOI that:

- the directive originated from advice associated with the National Police Chiefs' Council;
- the advice stemmed from the UK Gold Command Structure established during Operation Talla; and
- the decision to issue the directive *"came via the Gold Command."*

Documentary Significance

This is the first contemporaneous document within the chronology showing that the handling of CRN 6029679/21 had operational relevance beyond the Metropolitan Police and formed part of wider policing communications during the period covered by this bundle.

Cross References

Event 7B.

Event 8B.

Event 8B

12 February 2022

Further Attendance at Hammersmith Police Station

Primary Documents

Link:

https://ethicalapproach.co.uk/SAR_CR6029679_21PDF_260325_134829.pdf

Contemporaneous Record

The CRIS investigation log records that Philip Hyland, Mark Sexton and Dr Sam White attended Hammersmith Police Station to furnish the Officer in the Case with further evidential material.

The log records that they sought an update from the Officer in the Case by email and states:

"No documents were taken."

Documentary Significance

This entry records that additional material was offered during the period immediately preceding the closure letter and that the

contemporaneous investigation log records that the documents were not accepted.

Cross References

Event 7A.

Event 8C.

Event 8D.

Event 8C

14 February 2022

NPCC Internal Correspondence

Primary Documents

Internal NPCC email

Link:

https://ethicalapproach.co.uk/a4_FW_Full_Fact_Time_sensitive_false_claims_of_live_i_250715_164048.pdf

Contemporaneous Record

Internal NPCC correspondence concerning media enquiries discussed the Metropolitan Police crime report and included reference to *"guidance to not record"*.

One email stated:

"It would appear that the guidance to not record has been a success..."

The correspondence also referred to the Metropolitan Police crime report as one of only two police records then identified.

Documentary Significance

This correspondence records continuing national discussion concerning the Metropolitan Police crime report during the period immediately preceding the issue of the closure letter.

No conclusion is drawn as to the meaning or effect of the expressions used.

Cross References

Event 8D.

Event 9.

Event 8D

15 to 16 February 2022

Directorate of Legal Services Approval and Media Planning

Primary Documents

Internal Metropolitan Police emails concerning approval of the closure letter and associated communications.

Link:

https://ethicalapproach.co.uk/a5_FW_Anti_Vax_Letter_REDACTED_Final_250715_163943.pdf

Contemporaneous Record

Internal Metropolitan Police correspondence records that the proposed "*no crime*" letter had been approved through the Directorate of Legal Services.

The correspondence further records preparations for media communications to coincide with the issue of the letter and circulation of proposed press lines for approval by senior officers.

Documentary Significance

These documents record the final documented administrative steps immediately preceding the issue of the formal closure letter.

Cross References

Event 8C.

Event 9.

EVENT 9

21 February 2022

Formal Closure of CRN 6029679/21

Closure Letter

Primary Documents

Letter dated 21 February 2022, signed by Detective Superintendent Tor Garnett.

Link:

https://ethicalapproach.co.uk/closure_letter_21022022.jpg

Contemporaneous Record

On 21 February 2022, Detective Superintendent Tor Garnett issued the Metropolitan Police's formal written response concerning CRN 6029679/21.

The letter communicated the Metropolitan Police's conclusion that no criminal offences were considered apparent, that there was insufficient evidence to pursue an investigation and that no further action would be taken. It also informed the recipients that the matter would be recorded as an incident rather than a recorded crime.

This letter constitutes the final contemporaneous document within the period covered by this bundle.

Documentary Context

This letter should be read together with the preceding chronology, including:

- the CRIS operational record;
- supervisory entries;
- screening decisions;
- CID allocation;
- the 12 January communications;
- the 18 January contemporaneous records;
- the Police Scotland directive;
- the NPCC correspondence;
- and the Directorate of Legal Services communications.

The chronology makes no evaluative finding regarding the relationship between those documents. It simply reconstructs the documentary sequence leading to the issue of the closure letter.

Documentary Significance

This letter marks the conclusion of the period reconstructed by Bundle No. 1.

It is presented not as an isolated document, but as the concluding event in a chronology extending from the creation of CRN 6029679/21 on 20 December 2021 to the Metropolitan Police's formal written response on 21 February 2022.

Ian Clayton

18 July 2026

PART No. 2

CRN 6029679/21

**The National Operational and
Constitutional Context**

**Operation Talla, National Policing
Coordination and the Criminal Justice
System Strategic Command**

Compiled by

Ian Clayton - Lead Investigator, Ethical Approach UK

Purpose

This bundle forms the second part of a series of evidential bundles prepared in relation to the Metropolitan Police Service's handling of Crime Reference Number 6029679/21.

Evidence Bundle No. 1 reconstructed, in chronological sequence, the documentary handling of the crime report between 20 December 2021 and 21 February 2022, using contemporaneous records together with later-disclosed material where necessary to illuminate events occurring during that period.

This bundle serves a different purpose.

It examines the wider operational and constitutional framework within which CRN 6029679/21 was handled. Its purpose is to identify, from primary documentary sources, the national policing structures, command arrangements and criminal justice coordination mechanisms operating during the relevant period and to establish where CRN 6029679/21 appears within those documented structures.

It does not seek to determine the legal effect of those arrangements, nor does it invite findings concerning liability or misconduct. Those matters remain for the investigating authority.

Its purpose is confined to presenting the documentary record in an organised and transparent manner so that the institutional context surrounding CRN 6029679/21 may be understood before any evaluative conclusions are reached.

Methodology

The methodology adopted in this bundle is consistent with that used in Evidence Bundle No. 1.

The bundle distinguishes carefully between:

- contemporaneous documents created during Operation Talla;
- formal corporate witness statements;
- sworn oral evidence before the UK Covid-19 Inquiry;
- public statements made by senior office-holders;
- internal operational communications;
- later Freedom of Information disclosures;
- Subject Access Request material; and

- other documentary material relevant to understanding the national operational environment.

Where documents post-date the events under consideration, they are included only where they illuminate the contemporaneous operational framework or explain the structure within which earlier decisions were taken.

The chronology and analysis deliberately distinguish between documentary fact, documentary context and evidential questions arising from the material.

No submission is advanced unless expressly identified as such.

Scope of this Bundle

This bundle considers documentary material concerning:

- the establishment and purpose of Operation Talla;
- national policing coordination during the COVID-19 pandemic;
- the command structure of Operation Talla;

- the relationship between national policing and central Government;
- the Criminal Justice System Strategic Command (CJSSC);
- the interaction between policing and wider criminal justice governance; and
- the documentary pathway by which CRN 6029679/21 entered that wider national operational environment.

Read together with Evidence Bundle No. 1, the documents contained within this bundle seek to provide both the immediate chronology of the Metropolitan Police's handling of CRN 6029679/21 and the wider institutional context within which that chronology developed.

The National Operational Context

Introduction

The documents contained within this section establish, from primary sources, the national operational framework within which policing responded to the COVID-19 pandemic.

They originate from senior office-holders occupying constitutional positions of responsibility, including the Chair of the National Police Chiefs' Council, the Home Secretary and the National Police Chiefs' Council's corporate witness before the UK Covid-19 Inquiry.

Taken together, they consistently describe Operation Talla as a nationally coordinated policing response, operating through designated command structures and working closely with central Government.

The documents are presented to establish that wider operational framework before the chronology later considers the specific documentary history of CRN 6029679/21.

Document 1 - Video Evidence

The Establishment of Operation Talla

Primary Source

Operation Talla National Awards - Address by Martin Hewitt QPM
Chair, National Police Chiefs' Council

Link:

<https://youtu.be/tdsnssslKx4?is=DL4xygv4XEyWrdXQ>

Documentary Record

Martin Hewitt describes the emergence of Operation Talla during the earliest stages of the COVID-19 pandemic.

He explains that, following discussions with Chief Constable Paul Netherton during February 2020, it became apparent that policing required a coordinated national response to an evolving national emergency. Assistant Chief Constable Owen Weatherill was subsequently brought into those discussions as planning developed.

Martin Hewitt explains that the developing operation adopted five principal objectives:

- preserving life;
- maintaining law and order;
- preventing crime;

- maintaining policing services; and
- supporting national resilience.

He describes the operation as one undertaken in close partnership with Government and other public authorities in response to what he characterises as a national crisis.

National Coordination

Martin Hewitt states that Operation Talla was deliberately designed to provide national coordination.

He explains that policing adopted a model of coordinating activity *"from the centre"* and describes this as demonstrating what policing could achieve when acting collectively as a national service.

He further explains that the policing response was conducted across all four nations of the United Kingdom despite differing legislative arrangements, stating that policing approached the pandemic as *"one UK police force."*

Relationship with Government

Martin Hewitt explains that Operation Talla worked closely with Government throughout the pandemic response.

He refers to close collaboration with Government departments and Home Office officials and describes Operation Talla as part of a nationally coordinated response involving policing and Government working together throughout the emergency.

Documentary Significance

This video evidence establishes the national operational environment within which Operation Talla functioned.

For the purposes of this bundle it evidences, from the account of the then Chair of the National Police Chiefs' Council, that:

- Operation Talla was established as a nationally coordinated policing operation;
- national coordination was exercised from the centre;
- the operation functioned across all four jurisdictions of the United Kingdom; and
- close operational collaboration existed between policing and central Government.

No conclusion is drawn at this stage concerning CRN 6029679/21.

The purpose of this document is to establish the national operational architecture into which later documents place that crime report.

Outstanding Evidential Questions

- How was national coordination exercised in practice?
- Through which command structures was Operation Talla managed?
- How did national coordination operate alongside the statutory independence of individual Chief Constables?

- What mechanisms existed for communicating nationally agreed operational guidance to police forces?
- Where did CRN 6029679/21 subsequently enter that national operational structure?
- Strategic observation

Constitutional Relevance

This video evidence establishes, from a primary source, that Operation Talla was conceived and described as a nationally coordinated policing operation.

It provides the constitutional context within which subsequent documents concerning command structures, national guidance and the handling of CRN 6029679/21 are to be understood.

No conclusion is drawn regarding the legal implications of those arrangements; the document is included solely to establish the operational framework evidenced by the primary record.

Document 2 - Video Evidence

Government Description of Operation Talla

Primary Source

Operation Talla National Awards - Address by The Rt Hon Priti Patel
MP Home Secretary

Link:

https://youtu.be/tdsnssslKx4?is=eO9Ja_vz30mVGn9l

Documentary Record

In her address to those involved in Operation Talla, the Home Secretary described the policing response to the COVID-19 pandemic as a nationally coordinated endeavour requiring unprecedented cooperation between Government and policing.

She stated that:

"...that central and national coordination was like no other. It had not happened before..."

She further characterised Operation Talla as:

"...probably the greatest coming together of all aspects of policing as part of what was a national endeavour..."

Relationship Between Government and Policing

The Home Secretary describes extensive operational engagement between Government and policing throughout the pandemic.

She recounts frequent discussions with Martin Hewitt and senior policing leaders and explains that ministers, Home Office officials and policing representatives worked together in developing regulations, operational guidance and the policing response.

She refers to regulations and operational guidance frequently being prepared overnight to support operational policing the following day.

National Coordination

The Home Secretary explains that the response involved the creation of new arrangements for national coordination between Government and policing.

She describes these relationships as unprecedented and expresses the view that many should continue beyond the pandemic.

She states that:

"...those relationships didn't exist before..."

and explains that Operation Talla created new methods of cooperation between central Government and policing.

Operational Partnership

The Home Secretary repeatedly describes Operation Talla as a unified national endeavour.

She refers to:

- a national policing effort;
- policing assisting Government in operational decision-making;
- extensive collaboration across Government departments; and
- a common national purpose shared by policing and Government.

Documentary Significance

This video evidence provides the Government's description of the operational arrangements under which Operation Talla functioned.

Read together with Document 1, it independently evidences:

- central and national coordination;
- unprecedented operational cooperation between Government and policing;
- the existence of enduring command relationships developed during the pandemic; and
- Operation Talla being regarded as a national policing endeavour.

No conclusion is drawn concerning the legal consequences of those arrangements.

The video evidence is included solely to establish the operational context evidenced by the Government's own account.

Outstanding Evidential Questions

- What formal governance arrangements supported the central coordination described by the Home Secretary?

- How were operational decisions communicated from national structures to individual police forces?
- What role did the Home Office perform within those coordination arrangements?
- How did those national arrangements interact with the statutory independence of individual Chief Constables?
- Where does CRN 6029679/21 first appear within the nationally coordinated documentary record?

Constitutional Relevance

This video evidence provides an independent governmental description of the national operational environment established during the COVID-19 pandemic.

When read alongside the contemporaneous account of the Chair of the National Police Chiefs' Council, it demonstrates a consistent description of Operation Talla as a centrally coordinated national policing response undertaken in close partnership with Government.

It is included to establish the constitutional and operational framework against which later documentary references to CRN 6029679/21 can properly be understood.

Document 3

Corporate Witness Statement of Martin Hewitt

Primary Source

UK Covid-19 Inquiry - Corporate Witness Statement on behalf of the National Police Chiefs' Council

Martin Hewitt QPM

29 June 2023

Link:

https://ethicalapproach.co.uk/29062023_INQ000216925_251106_205217.pdf

Documentary Record

Martin Hewitt confirms that this statement is made on behalf of the National Police Chiefs' Council in response to a Rule 9 request issued by the UK Covid-19 Inquiry.

He explains the constitutional role of the NPCC, describing it as the body responsible for national coordination between police forces in England and Wales while emphasising that Chief Constables retain operational independence within their respective forces.

The statement records that the NPCC's functions include:

- coordinating national policing operations;
- coordinating the policing response to national emergencies;

- developing national operational policy;
- facilitating cooperation between police forces; and
- supporting national criminal justice coordination.

Operation Talla

The statement records that Operation Talla was established during March 2020 to provide a national coordination function for policing throughout the COVID-19 pandemic.

It identifies:

- Martin Hewitt as National Gold;
- Assistant Chief Constable Owen Weatherill as National Silver; and
- Operation Talla as operating across England, Wales, Scotland and Northern Ireland through nationally coordinated policing arrangements.

National Policy and Legislation

The statement explains that one of the principal responsibilities assigned to National Silver concerned policy and legislation.

It records that this workstream was responsible for ensuring that policing remained connected with Government in relation to developing legislation and regulations and that legal advice was rapidly translated into national guidance issued to police forces.

Operational Independence

The statement also records that, notwithstanding these national coordination arrangements, operational policing decisions remained the responsibility of individual Chief Constables.

The NPCC is described as possessing no statutory power to direct police forces operationally.

Documentary Significance

This statement provides the National Police Chiefs' Council's formal constitutional description of its own role during the COVID-19 pandemic.

For the purposes of this bundle it establishes, from the NPCC's own corporate evidence, that:

- Operation Talla functioned through identified national Gold and Silver command arrangements;
- national policing coordination extended across the United Kingdom;
- formal workstreams existed for policy and legislation;
- national guidance was developed from legal advice; and
- these arrangements operated alongside the stated operational independence of individual Chief Constables.

No conclusion is drawn as to the constitutional implications of those arrangements.

The statement is included to establish the national command framework described by the NPCC itself.

Outstanding Evidential Questions

- How did the National Gold and National Silver structures operate in practice?
- What legal status attached to national guidance issued through the Policy and Legislation workstream?
- How was the distinction between national coordination and operational independence applied during Operation Talla?
- What documentary records exist of communications issued through the National Silver Policy and Legislation workstream?
- When did CRN 6029679/21 first become known within these national structures?

Constitutional Relevance

This document marks an important transition within the bundle.

Unlike the public descriptions considered in Section 1, it is a formal corporate witness statement submitted to a statutory public inquiry. It therefore represents the National Police Chiefs' Council's considered constitutional description of its own role, governance arrangements and command structure during the pandemic.

It establishes the documentary framework against which subsequent Inquiry evidence, internal communications and documents relating specifically to CRN 6029679/21 can be examined.

Document 4

Oral Evidence of Martin Hewitt

Primary Source

UK Covid-19 Inquiry - Module 2 - Oral Evidence of Martin James Hewitt

9 November 2023

Link:

https://ethicalapproach.co.uk/hewitt_oral_transcript_extract_summary.pdf

Documentary Record

Martin Hewitt confirmed to the Inquiry that he was giving evidence as the National Police Chiefs' Council's corporate witness and that his evidence was given pursuant to a statement of truth.

He confirmed that he occupied the role of Operation Talla Gold Commander and described the establishment of the national command arrangements at the outset of the pandemic.

National Command

Martin Hewitt explained that, at the beginning of the pandemic, he convened all Chief Constables because he considered that the policing response required national coordination.

He stated:

"I was what we would call the Gold Commander for Operation Talla."

He continued:

"I pulled all the chief constables together... this is going to require national co-ordination."

He then described the decision reached:

"We need to do this and we will run this from the centre."

Relationship with Government

Martin Hewitt explained that the national policing response was designed to operate in close collaboration with Government.

He stated:

"We needed to have a co-ordinated response from the police service... working into and with government."

He further explained that:

"The team in Op Talla worked very closely with the team sitting in the Home Office..."

United Kingdom Policing

Martin Hewitt confirmed that Operation Talla operated as a UK-wide policing response notwithstanding differing legislative arrangements in England, Wales, Scotland and Northern Ireland.

He stated that Scotland and Northern Ireland were fully integrated into the policing arrangements and that guidance issued in England and Wales was shared with those jurisdictions.

He concluded:

"...we ran this as a UK police response..."

Operational Consistency

Martin Hewitt explained that one of the principal objectives of Operation Talla was to achieve consistency across policing.

He stated:

"...what we were aiming for was to try to get as much consistency as was possible..."

Documentary Significance

This oral evidence expands upon the constitutional framework described in the earlier corporate witness statement.

In particular, it records, in Martin Hewitt's own evidence before the Inquiry, that:

- he fulfilled the role of Operation Talla Gold Commander;
- he convened Chief Constables nationally;
- the decision was taken to coordinate the response centrally;
- policing worked closely with Government throughout the pandemic;
- the response was conducted as a UK policing operation; and

- achieving national operational consistency was an express objective.

This section records those matters without drawing conclusions as to their constitutional or legal consequences.

Outstanding Evidential Questions

- How was the decision to *"run this from the centre"* implemented operationally?
- What national communications flowed from the Gold and Silver command arrangements?
- How were national policing objectives translated into operational guidance for individual forces?
- How did UK-wide coordination operate where legislation differed between jurisdictions?
- Through which command structures did information concerning CRN 6029679/21 later circulate?

Constitutional Relevance

This evidence is significant because it is not descriptive commentary or retrospective opinion. It is sworn oral evidence given before a statutory public inquiry by the individual who identified himself as Operation Talla Gold Commander and who was giving evidence on behalf of the National Police Chiefs' Council.

Read together with the earlier corporate witness statement, it provides a coherent constitutional description of Operation Talla's

command arrangements, the role of national coordination and the relationship between policing and Government.

It establishes the framework within which the later documentary references to CRN 6029679/21 can be understood, without itself advancing any conclusion regarding the legal significance of those arrangements.

Document 5

Corporate Witness Statement of Martin Hewitt

Primary Source

UK Covid-19 Inquiry - Module 7 - Corporate Witness Statement on behalf of the National Police Chiefs' Council

Martin Hewitt QPM

9 April 2025

Link:

https://ethicalapproach.co.uk/INQ000587307_251106_205049.pdf

Documentary Record

This statement was submitted on behalf of the National Police Chiefs' Council in response to a further Rule 9 request issued by the UK Covid-19 Inquiry.

Unlike the earlier corporate witness statement, this document was prepared after the Inquiry had already received extensive documentary disclosure and witness evidence concerning the operation of national policing during the pandemic.

The statement expressly incorporates and relies upon earlier evidence submitted by:

- Martin Hewitt;
- Assistant Chief Constable Owen Weatherill;

- Deputy Chief Constable Alan Speirs; and
- Chief Constable Alan Todd.

Continuity of the National Position

The statement continues to describe the National Police Chiefs' Council as the body responsible for national coordination while maintaining the constitutional distinction that operational policing remained the responsibility of individual Chief Constables.

It therefore presents the Inquiry with a consolidated constitutional account of the NPCC's role after consideration of the earlier evidence placed before the Inquiry.

Documentary Consolidation

Of particular significance, this statement expressly draws together the evidence of several senior police witnesses into a single corporate account.

Accordingly, it should not be read in isolation. Rather, it operates as a consolidated institutional statement that adopts and builds upon the earlier witness evidence already before the Inquiry.

Documentary Significance

This statement is significant for two reasons.

Firstly, it demonstrates that the National Police Chiefs' Council chose to maintain a consistent constitutional description of its role following the Inquiry's receipt of extensive evidence.

Secondly, it expressly incorporates the evidence of other senior police leaders whose own statements describe the command arrangements, governance structures and national coordination associated with Operation Talla.

For the purposes of this bundle, it therefore provides an important documentary bridge between the earlier constitutional evidence and the individual witness statements considered later.

No conclusion is drawn regarding the legal implications of that continuity.

Outstanding Evidential Questions

- In what respects does this statement confirm, modify or develop the constitutional position described in the earlier corporate witness statement?
- What additional documentary material informed the preparation of this later statement?
- How do the incorporated witness statements collectively describe the governance and command structure of Operation Talla?
- What further documents were available to the NPCC by April 2025 which had not been available when the earlier statement was prepared?

- How should this consolidated corporate account be read alongside the contemporaneous operational documents considered later in this bundle?

Constitutional Relevance

This document occupies a distinct place within the evidential structure of this bundle.

Unlike the earlier corporate witness statement, it was prepared after the Inquiry had received substantial documentary disclosure and oral evidence.

It therefore represents a later institutional restatement of the National Police Chiefs' Council's constitutional position, whilst expressly incorporating the evidence of multiple senior police witnesses.

Its importance lies not in introducing an entirely new account, but in demonstrating how the NPCC chose to present its consolidated institutional position to the Inquiry after the evidential picture had significantly developed.

Document 6

Corporate Witness Statement of Gregor McGill

Primary Source

UK Covid-19 Inquiry - Module 7

Corporate Witness Statement of Gregor McGill, Director of Legal Services, Crown Prosecution Service

Link:

https://ethicalapproach.co.uk/mcgill_INQ000188838_251221_215255.pdf

Documentary Record

Gregor McGill explains that, during the COVID-19 pandemic, the Crown Prosecution Service participated within national criminal justice governance arrangements established to coordinate the operation of the criminal justice system.

He records that the principal cross-government mechanism was the Criminal Justice System Strategic Command (CJSSC).

The statement explains that the CJSSC was established by the Ministry of Justice to provide:

- overall responsibility for multi-agency management;
- strategic coordination across criminal justice organisations; and
- a common strategic framework for responding to the pandemic.

National Governance

The statement records that the CJSSC operated through established command arrangements comprising:

- Gold;
- Silver; and
- Bronze groups.

Gregor McGill explains that the Crown Prosecution Service participated within these structures throughout the pandemic response.

Development of National Criminal Justice Policy

The statement explains that nationally significant criminal justice policies were developed through these command structures.

In particular, Gregor McGill records that decisions leading to the publication of the Interim Charging Protocol and Interim Case Review Guidance were taken within the Silver command structure.

Relationship with National Policing

The statement records that criminal justice policy developed within the CJSSC environment was shared with national policing.

Gregor McGill explains that the Interim Charging Protocol was discussed with representatives of the National Police Chiefs'

Council before being shared with both the CJSSC Gold Group and NPCC Gold Command.

He further records consultation with:

- NPCC portfolio leads;
- the College of Policing;
- HMCTS;
- the Judicial Office;
- Ministry of Justice officials; and
- CJSSC Silver structures during development of national guidance.

Documentary Significance

This statement establishes, from the evidence of the Crown Prosecution Service, that national criminal justice governance operated through the Criminal Justice System Strategic Command during the pandemic.

For the purposes of this bundle it evidences that:

- the CJSSC existed as a multi-agency strategic command structure;
- it operated through Gold, Silver and Bronze arrangements;
- national criminal justice policy was developed within those structures; and
- documentary material was shared between the CJSSC and National Police Chiefs' Council Gold command arrangements.

This section does not seek to define the constitutional relationship between the CJSSC and Operation Talla. It records only what is established by the documentary evidence.

Outstanding Evidential Questions

- What was the formal constitutional relationship between the CJSSC and Operation Talla?
- Which organisations participated simultaneously in both command environments?
- What information was exchanged between CJSSC Gold and NPCC Gold Command?
- What governance arrangements existed for criminal justice policy developed during the pandemic?
- How did these command structures interact with the operational independence of participating organisations?

Constitutional Relevance

This document broadens the institutional context established in the preceding sections.

Where earlier documents describe the national policing command arrangements operating through Operation Talla, this statement independently evidences the existence of a parallel strategic command environment responsible for coordinating the wider criminal justice system.

The documentary record demonstrates that these environments involved overlapping public bodies and shared policy development and communication.

This bundle does not seek to define their constitutional relationship beyond what is evidenced in the primary sources.

It establishes the wider governance context within which subsequent documents, including those relating to CRN 6029679/21, may be examined.

Operation Talla Across the United Kingdom

Introduction

The preceding sections establish the national policing and criminal justice structures operating during the COVID-19 pandemic.

This section considers how those national arrangements were described by Police Scotland.

The purpose is to establish, from Police Scotland's own evidence, the manner in which Operation Talla functioned across the four jurisdictions of the United Kingdom before later sections examine documentary references to CRN 6029679/21.

Document 7

Corporate Witness Statement of Deputy Chief Constable Alan Speirs

Primary Source

UK Covid-19 Inquiry - Module 7 - Corporate Witness Statement of
Deputy Chief Constable Alan Speirs, Police Scotland

31 March 2025

Link:

https://ethicalapproach.co.uk/INQ000587776_251109_095908.pdf

Documentary Record

Deputy Chief Constable Alan Speirs explains that Police Scotland established its pandemic response following meetings of the Scottish Government Resilience Room (SGORR) during January 2020.

He records that Police Scotland adopted the operational name Operation Talla for that response.

The statement further records that the title Operation Talla was subsequently adopted by the National Police Chiefs' Council for the wider United Kingdom policing response in order to provide a common operational identity.

United Kingdom Coordination

Deputy Chief Constable Speirs explains that Police Scotland participated fully in national policing coordination throughout the pandemic.

He records that Police Scotland:

- attended NPCC Gold and Silver meetings;
- participated in UK-wide Operation Talla discussions;
- maintained regular liaison with the National Police Chiefs' Council; and
- engaged directly with the national policing command structure established for the pandemic response.

National Command Structure

The statement identifies the principal national office-holders involved in that coordination.

Deputy Chief Constable Speirs records liaison with:

- Chief Constable Paul Netherton;
- Assistant Chief Constable Owen Weatherill; and
- Martin Hewitt in his role as National Gold Commander.

The statement further records that NPCC Gold and Silver meetings formed the principal mechanism through which national coordination was maintained.

National Guidance

Deputy Chief Constable Speirs explains that national guidance, policies and operational briefings produced through the NPCC structures were routinely shared with Police Scotland.

He states that those documents were reviewed within Police Scotland and adopted, adapted or modified where necessary to reflect the distinct legislative framework applying in Scotland.

Documentary Significance

This statement independently confirms, from the perspective of Police Scotland, the existence of a UK-wide policing coordination structure operating through Operation Talla.

For the purposes of this bundle, it evidences that:

- Operation Talla operated across all four UK policing jurisdictions;
- Police Scotland participated within NPCC Gold and Silver arrangements;
- national operational guidance was shared between policing jurisdictions; and
- mechanisms existed for reviewing and implementing nationally circulated guidance within Police Scotland. ²

The statement also records that policing arrangements continued to recognise differences in the underlying legal frameworks applying within the constituent jurisdictions.

Outstanding Evidential Questions

- How were nationally agreed operational approaches communicated to Police Scotland?
- What criteria determined whether national guidance would be adopted, adapted or modified?
- What records exist of NPCC Gold and Silver discussions concerning operational guidance?
- What role did Police Scotland play in the development of nationally circulated guidance?
- Through what documentary pathway did CRN 6029679/21 subsequently become relevant to Police Scotland's Operation Talla command structure?

Constitutional Relevance

This statement is significant because it provides an independent account from one of the participating UK police services.

Read alongside the evidence of Martin Hewitt and the National Police Chiefs' Council, it consistently describes a coordinated UK policing response conducted through Operation Talla, whilst preserving the constitutional distinction that policing remained subject to the separate legal frameworks of each jurisdiction.

For the purposes of this bundle, it establishes the documentary foundation upon which later sections examine Police Scotland's operational communications, the Speirs Directive, subsequent Freedom of Information disclosures, and their relevance to the documentary history of CRN 6029679/21.

Document 8
Chief Constables' Council
National Consideration of CRN 6029679/21

Primary Source

National Police Chiefs' Council - Chief Constables' Council Minutes
12 January 2022

Link:

https://ethicalapproach.co.uk/14_january_2022_260406_032139.pdf

Documentary Record

The Chief Constables' Council minutes of 12 January 2022 represent the earliest currently identified national documentary reference to Crime Reference Number 6029679/21.

The minutes demonstrate that the crime report had progressed beyond the Metropolitan Police Service and had become the subject of consideration within the National Police Chiefs' Council's principal forum of Chief Constables.

The minutes record that the allegations had been subjected to national consideration and that work concerning the report remained ongoing at the time of the meeting. They further indicate that a formal assessment had been undertaken and that a peer

review process was either being conducted or was anticipated before any final position was reached.

Accordingly, the documentary record demonstrates that the crime report was no longer being considered solely as a local Metropolitan Police matter, but had entered a wider national policing environment.

National Consideration

The minutes demonstrate that Chief Constables were informed of the existence of CRN 6029679/21.

The document records discussion concerning:

- the allegations contained within the crime report;
- work undertaken to assess those allegations;
- the intention that the assessment would undergo peer review; and
- the expectation that a final position would subsequently be communicated.

The minutes therefore evidence national awareness of the existence of the crime report at Chief Constables' Council level.

Constitutional Context

The significance of these minutes is not that they determine the merits of the allegations.

It is that they demonstrate that CRN 6029679/21 had entered the documentary environment of the National Police Chiefs' Council at the highest operational level.

Read alongside the preceding documents within this bundle, the minutes represent the first documentary point at which the specific crime report intersects with the national command structures previously described.

Relationship to Operation Talla

The Chief Constables' Council minutes should be read alongside the preceding documentary evidence describing:

- Operation Talla National Gold;
- Operation Talla National Silver;
- national policing coordination;
- United Kingdom operational consistency; and
- the dissemination of national operational guidance.

The minutes neither expressly determine the constitutional relationship between those structures and CRN 6029679/21 nor attribute responsibility to any particular office-holder.

They do, however, establish that the crime report had become the subject of discussion within the National Police Chiefs' Council's highest collective operational forum.

Documentary Significance

For the purposes of this bundle, these minutes constitute the first presently identified documentary evidence demonstrating that CRN 6029679/21 had entered the national policing command environment.

The document evidences:

- national awareness of the crime report;
- consideration by Chief Constables;
- reference to an assessment process;
- reference to peer review; and
- an intention that a concluded position would subsequently be communicated.

This represents an important transition within the documentary chronology.

Until this point, the bundle has reconstructed the national operational architecture.

From this document onwards, the evidence begins to demonstrate how CRN 6029679/21 entered that architecture.

Outstanding Evidential Questions

- Who commissioned the assessment referred to within the Chief Constables' Council minutes?
- Who conducted that assessment?
- Who performed the recorded peer review?
- Upon what evidential material was the assessment based?

- Was the Metropolitan Police Service represented during the relevant discussion?
- To whom was the final assessment communicated?
- What influence, if any, did the assessment have upon subsequent national communications?
- What documentary relationship exists between these minutes and the communications issued by Assistant Chief Constable Owen Weatherill six days later?

Constitutional Relevance

These minutes represent a significant evidential transition within this bundle.

The preceding documents establish the constitutional architecture of Operation Talla, the National Police Chiefs' Council and the wider criminal justice command environment.

These minutes are the first presently identified primary document demonstrating that CRN 6029679/21 entered that national policing structure.

They therefore form the documentary bridge between the constitutional framework established in the earlier sections and the operational communications that follow.

Their importance lies not in the conclusions they express, but in the institutional level at which the crime report is shown to have been under consideration.

Document 9

National Communication Concerning CRN 6029679/21

Primary Source

National Police Chiefs' Council - Communication issued by
Assistant Chief Constable Owen Weatherill

18 January 2022

Link:

https://ethicalapproach.co.uk/communication_to_police_chiefs_18012022.pdf

Chronological Position

18 January 2022

Six days after the Chief Constables' Council considered CRN 6029679/21, Assistant Chief Constable Owen Weatherill (Talla Silver) issued a national communication concerning the crime report CRN 6029679/21.

This is the earliest presently identified national operational communication relating specifically to CRN 6029679/21.

Documentary Record

On 18 January 2022, Assistant Chief Constable Owen Weatherill, acting in his capacity as Operation Talla National Silver Commander and National Mobilisation Coordinator, circulated a communication to Chief Constables and other senior policing leaders concerning CRN 6029679/21.

The communication demonstrates that the crime report remained under active national consideration and that information concerning it was being disseminated beyond the Metropolitan Police Service through established national policing structures.

The document records that a detailed assessment of the allegations had been undertaken and that the outcome of that assessment was being communicated nationally.

It also confirms that the communication was directed to senior operational leadership across policing rather than remaining confined to the originating force.

National Dissemination

The communication evidences the existence of a structured national information pathway.

It demonstrates that information concerning CRN 6029679/21 was circulated through national policing channels to senior officers occupying strategic command positions.

Read alongside the Chief Constables' Council minutes dated 12 January 2022, the communication demonstrates continuity of national engagement with the crime report during January 2022.

Relationship to Earlier Documents

This communication follows directly after:

- consideration by the Chief Constables' Council;
- the assessment process referred to within those minutes; and
- the constitutional command structure previously established within this bundle.

Accordingly, it represents the first presently identified operational communication issued nationally concerning CRN 6029679/21.

Documentary Significance

For the purposes of this bundle, this document demonstrates that:

- CRN 6029679/21 was the subject of a national communication issued by Operation Talla National Silver;
- the communication was disseminated to senior policing leadership;
- the Metropolitan Police Service was no longer the only policing body documented as considering the matter; and
- nationally coordinated communication concerning the crime report was occurring during January 2022.

This document therefore forms an important stage in the documentary progression from local crime report to nationally circulated operational issue.

Outstanding Evidential Questions

- What prompted the issue of this national communication?
- Which officers or organisations contributed to its preparation?
- To whom precisely was the communication distributed?
- What operational action, if any, was expected from recipient police forces?
- How did this communication influence subsequent policing activity within individual forces?
- What relationship exists between this communication and the Police Scotland Speirs Directive issued one week later?
- Were any subsequent national communications issued concerning CRN 6029679/21?

Constitutional Relevance

This document represents the first presently identified national operational communication concerning CRN 6029679/21 issued by the officer identified elsewhere in the documentary record as Operation Talla National Silver Commander.

Read alongside the preceding constitutional material, it demonstrates that the crime report had progressed beyond consideration within the originating force and had become the subject of communication through national policing structures.

The document does not, of itself, establish the legal effect of that communication or the obligations arising from it.

It evidences that CRN 6029679/21 had entered an established national operational pathway, the constitutional context of which has been reconstructed in the preceding sections of this bundle.

Document 10

The Speirs Directive

Primary Source

Police Scotland

National Operational Communication

Issued by Assistant (now Chief) Chief Constable Alan Speirs on 25 January 2022

Chronological Position

25 January 2022

Link:

https://ethicalapproach.co.uk/speirs_directive.pdf

Seven days after the national communication issued by Assistant Chief Constable Owen Weatherill, Assistant Chief Constable Alan Speirs issued a national communication throughout Police Scotland concerning reports relating to COVID-19 vaccination.

This is the earliest presently identified document evidencing operational implementation within a United Kingdom police force following the national communications considered in the preceding documents.

Documentary Record

On 25 January 2022, Assistant Chief Constable Alan Speirs issued operational guidance throughout Police Scotland concerning reports received from members of the public relating to COVID-19 vaccination.

The directive instructed that reports of this nature were not to be recorded as crimes, but instead directed officers towards specified intelligence and operational reporting pathways.

The communication therefore established a defined operational approach to the handling of a particular category of reports received by Police Scotland.

Relationship to National Communications

The timing of the directive is notable.

It followed:

- the Chief Constables' Council consideration of CRN 6029679/21 on 12 January 2022;
- the national communication issued by Assistant Chief Constable Owen Weatherill on 18 January 2022; and
- the continuing national coordination arrangements established through Operation Talla.

The directive therefore forms part of the documentary sequence examined within this bundle.

Subsequent Documentary Development

The significance of the directive is further informed by later documentary disclosures.

Police Scotland subsequently confirmed, in response to Freedom of Information requests, that:

- the decision to issue the directive came via the Gold Command;
- advice received from the National Police Chiefs' Council formed part of the process; and
- the operational approach reflected national coordination undertaken during Operation Talla.

Those later disclosures are considered separately within the following document and are not relied upon here to interpret the directive itself.

Documentary Significance

For the purposes of this bundle, the Speirs Directive represents the first presently identified documentary evidence demonstrating operational implementation within a participating UK police force following the nationally coordinated communications described in the preceding sections.

It was established that implementation of the directive had taken place, when video footage from March 2024 emerged. The relevant video footage can be seen by means of this link:

https://youtube.com/shorts/1e90oAtJoz0?is=LFAQ__6HxIJ7lXqj

The directive issued by ACC Speirs evidences:

- the adoption of a defined operational approach;
- dissemination of that approach throughout Police Scotland;
- direction concerning the recording and handling of relevant reports; and
- continuity within the January 2022 documentary chronology.

The document is included to establish the existence of the directive and its place within that chronology.

Outstanding Evidential Questions

- What material informed the preparation of the Speirs Directive?
- What role did Operation Talla command structures play in its development?
- What was understood by the instruction that relevant reports were not to be recorded as crimes?
- How was the directive communicated operationally throughout Police Scotland?
- Was comparable guidance issued within any other United Kingdom police force?
- What documentary relationship exists between this directive and the earlier national communications considered in this bundle?
- What role did the Gold Command play in authorising the directive?

Constitutional Relevance

This document marks the point at which the documentary record moves from national coordination to operational implementation.

The preceding sections establish the constitutional and organisational framework of Operation Talla.

The Speirs Directive demonstrates that, within one participating police service, nationally coordinated discussions were followed by the issue of operational guidance concerning the handling of reports from members of the public.

The subsequent Freedom of Information disclosures examined in the next document provide additional documentary context concerning the provenance of that directive. They are considered separately in order to preserve the distinction between the contemporaneous operational document and the evidence explaining its origin.

Document 11

Police Scotland Freedom of Information Disclosure

The Provenance of the Speirs Directive

Primary Source

Police Scotland Freedom of Information Response

Reference: FOI 25-0673

Chronological Position

20 March 2025

Link:

https://ethicalapproach.co.uk/FOI_25_0673.pdf

More than three years after the Speirs Directive was issued, Police Scotland disclosed information concerning its provenance in response to a Freedom of Information request.

This disclosure constitutes the first formal explanation provided by Police Scotland regarding the origin of the January 2022 directive.

Documentary Record

Police Scotland confirmed that the January 2022 operational communication issued by Assistant Chief Constable Alan Speirs did not arise in isolation.

The force explained that the directive formed part of wider national discussions occurring during Operation Talla.

Most significantly, Police Scotland confirmed that:

"...the decision came via the Gold Command."

This represents the first documentary confirmation by Police Scotland of the command provenance of the operational decision.

National Coordination

The Freedom of Information response further records that:

- the National Police Chiefs' Council was involved in the relevant discussions;
- Operation Talla formed part of the operational context;
- national policing considerations informed the approach subsequently adopted by Police Scotland; and
- the January 2022 communication reflected that wider operational environment.

The disclosure therefore provides documentary context concerning the operational pathway that preceded the issue of the Speirs Directive.

Relationship to Earlier Documents

Read together, Documents 8, 9 and 10 demonstrate:

- national consideration of CRN 6029679/21;
- national operational communication;

- operational implementation within Police Scotland.

This Freedom of Information disclosure provides Police Scotland's subsequent explanation of the provenance of that implementation.

It therefore forms an evidential bridge between the contemporaneous January 2022 documents and the later documentary disclosures.

Documentary Significance

For the purposes of this bundle, this disclosure evidences that Police Scotland subsequently attributed the decision underpinning the Speirs Directive to:

- Gold Command;
- Operation Talla;
- national policing discussions; and
- engagement involving the National Police Chiefs' Council.

The document does not determine the legal significance of those matters. It identifies the provenance attributed by Police Scotland itself to the January 2022 directive.

Outstanding Evidential Questions

- Which Gold Command is referred to within the Freedom of Information response?
- What documentary records exist concerning the Gold Command decision?

- What advice, if any, was provided by the National Police Chiefs' Council before the directive was issued?
- What role did Operation Talla command structures perform in the decision-making process?
- Which documents explain the relationship between the Gold Command decision and the national communication issued on 18 January 2022?
- Were equivalent operational decisions taken by other police forces?

Constitutional Relevance

This document occupies a unique place within the evidential sequence.

Unlike the preceding documents, it is not contemporaneous with the January 2022 events. Rather, it is a later disclosure in which Police Scotland explains the provenance of an earlier operational decision.

Its significance lies in the fact that the explanation comes from Police Scotland itself.

Read together with the preceding documents, the disclosure provides an important element of the documentary chronology by identifying the command origin attributed to the Speirs Directive and placing that directive within the wider framework of Operation Talla and national policing coordination.

Document 12 (a to d)

**National Police Chiefs' Council Internal
Communications**

Internal Assessment of National Guidance

Primary Sources

National Police Chiefs' Council internal emails.

Chief Constables' Council records.

Internal operational communications disclosed through Freedom of Information and Subject Access Request processes.

Chronological Position

January 2022 onwards

(a) Link 1:

https://ethicalapproach.co.uk/a4_FW_Full_Fact_Time_sensitive_false_claims_of_live_i_250715_164048.pdf

(b) Link 2:

https://ethicalapproach.co.uk/a5_FW_Anti_Vax_Letter_REDACTED_Final_250715_163943.pdf

(c) Link 3:

https://ethicalapproach.co.uk/communication_to_police_chiefs_18012022.pdf

(d) Link 4:

The documents considered within this section comprise internal communications generated during and after the nationally coordinated response examined in the preceding documents.

Unlike the public statements and formal witness evidence considered earlier in this bundle, these documents record internal institutional communications concerning the development, implementation and subsequent assessment of nationally coordinated guidance.

Documentary Record

The internal communications demonstrate that national guidance concerning the handling of certain COVID-19-related reports continued to be discussed within national policing structures after its dissemination.

The documents record discussion concerning guidance relating to the recording of reports and subsequent internal assessment of that guidance.

Of particular significance, one internal communication records the following assessment:

"...the guidance to not record has been a success."

This statement appears within the context of internal discussion concerning the operational guidance previously examined within this bundle.

Relationship to Earlier Documents

The internal communications should be read alongside:

- the Chief Constables' Council minutes;
- the national communication issued by Assistant Chief Constable Owen Weatherill;
- the Speirs Directive; and
- the subsequent Police Scotland Freedom of Information disclosure explaining that the relevant decision "*came via the Gold Command.*"

Unlike those documents, however, these communications do not announce or implement operational guidance.

Instead, they appear to record internal reflection upon guidance that had already been issued.

Documentary Significance

For the purposes of this bundle, these communications are significant because they provide an internal institutional record relating to guidance previously considered in the documentary chronology.

They demonstrate that:

- nationally coordinated guidance remained the subject of internal discussion;
- the guidance itself was later evaluated internally; and
- an internal assessment was recorded describing the guidance "*to not record*" as "*a success*."

The documents do not, of themselves, define the criteria by which that assessment was reached. Nor do they explain the operational outcomes upon which the assessment was based.

Those matters remain evidential questions.

Outstanding Evidential Questions

- What specific guidance is being referred to by the phrase "*guidance to not record*"?
- By what criteria was that guidance assessed as "*a success*"?
- Who undertook that assessment?
- What documentary evidence informed that conclusion?
- Was the assessment communicated beyond the authors of the internal correspondence?
- What relationship exists between that assessment and the contemporaneous handling of CRN 6029679/21?
- Did any force depart from, modify or reject the nationally coordinated approach?

Constitutional Relevance

This document differs from the preceding material in one important respect.

The earlier documents describe, announce or explain national operational arrangements.

These internal communications provide evidence of how aspects of those arrangements were subsequently discussed within the institutions responsible for their development and implementation.

The bundle advances no conclusion as to the meaning or legal significance of the phrase *"the guidance to not record has been a success."*

It instead identifies that phrase as part of the primary documentary record and places it within the chronological sequence established by the preceding documents.

Its significance lies in the fact that it constitutes an internal institutional assessment of guidance already examined elsewhere in this bundle.

Document 13
Metropolitan Police Subject Access Request
Disclosure
Internal Handling of CRN 6029679/21

Primary Source

Metropolitan Police Service

Subject Access Request Disclosure Re: CRN 6029679/21

Chronological Position

Subject Access Request disclosure issued following upon investigation of events described in this paper.

Link:

https://ethicalapproach.co.uk/SAR_CR6029679_21PDF_260325_134829.pdf

The documents considered in this section comprise internal Metropolitan Police records disclosed under the Data Protection Act following Subject Access Requests.

Although disclosed subsequently, the records illuminate contemporaneous investigative activity undertaken during the handling of CRN 6029679/21.

Documentary Record

The Subject Access Request disclosure reveals internal Metropolitan Police activity concerning CRN 6029679/21 which was not apparent from the public correspondence issued at the time.

The disclosed records demonstrate that the crime report generated internal policing activity extending beyond the limited public description previously provided to the complainants.

The records include evidence of:

- internal supervisory consideration;
- investigative actions;
- review of evidential material;
- engagement by specialist officers;
- continuing internal communications; and
- decision-making processes extending over a significant period.

The disclosure therefore provides an internal documentary record of Metropolitan Police activity concerning CRN 6029679/21.

Relationship to Earlier Documents

The Subject Access Request disclosure should be read together with:

- Evidence Bundle No. 1;
- the Chief Constables' Council minutes;

- the national communication issued by Assistant Chief Constable Owen Weatherill;
- the Speirs Directive;
- Police Scotland's Freedom of Information disclosure; and
- the National Police Chiefs' Council internal communications.

Read collectively, these documents provide both the national operational context and the originating force's (Metropolitan Police) internal documentary record.

Documentary Significance

The significance of the Subject Access Request disclosure lies not merely in the documents themselves, but in the additional context they provide.

The records demonstrate that internal Metropolitan Police activity occurred contemporaneously with the wider national developments examined throughout this bundle.

They therefore enable the handling of CRN 6029679/21 to be considered within both:

- its internal Metropolitan Police chronology; and
- the wider national operational environment established by the preceding documentary record.

No inference is drawn beyond what is established by the disclosed documents themselves.

Relationship to Evidence Bundle No. 1

Evidence Bundle No. 1 reconstructed the chronological handling of CRN 6029679/21 within the Metropolitan Police Service.

This document should be read alongside that chronology.

Bundle No. 2 does not repeat the detailed chronology already established.

Instead, it demonstrates that the Metropolitan Police's internal documentary record developed contemporaneously with the wider national operational structures reconstructed throughout this bundle.

Taken together, the two bundles provide complementary perspectives:

- Bundle No. 1 reconstructs the handling of CRN 6029679/21 within the Metropolitan Police Service.
- Bundle No. 2 reconstructs the national operational and constitutional environment within which that handling occurred.

Outstanding Evidential Questions

- How should the Metropolitan Police's internal records be understood when read alongside the national documentary record reconstructed within this bundle?
- What information concerning CRN 6029679/21 was exchanged between the Metropolitan Police and national policing structures?

- Which internal Metropolitan Police decisions were taken independently, and which occurred following national communications?
- What documentary links remain to be identified between the Metropolitan Police chronology and the wider Operation Talla command structure?
- Are there further undisclosed records capable of explaining the relationship between the Metropolitan Police's internal activity and the national documents examined within this bundle?

Constitutional Relevance

This document completes the evidential sequence reconstructed throughout Bundle No. 2.

The bundle began by establishing the constitutional architecture of national policing during the COVID-19 pandemic.

It then traced the documented progression of CRN 6029679/21 through national policing structures, operational communications and subsequent institutional disclosures.

The Metropolitan Police Subject Access Request material returns the reader to the originating force, now viewed against that wider documentary background.

The purpose of this bundle has not been to determine legal responsibility or institutional fault. It has instead been to reconstruct, from primary documentary sources, the operational and constitutional context within which CRN 6029679/21 was handled.

Closing Observation

Evidence Bundle No. 1 reconstructed the documentary handling of CRN 6029679/21.

Evidence Bundle No. 2 reconstructs the national operational and constitutional environment within which that handling occurred.

Neither bundle advances findings of fact beyond the documentary record. Their purpose is to assist the investigating authority by presenting relevant primary material in a structured, chronological and transparent manner, thereby enabling the evidence to be considered in its proper institutional context.

Ian Clayton

21 July 2026

PART No. 3

CRN 6029679/21

**Evidence, Criminal Investigation,
Judicial Review and the Duty of
Candour**

Compiled by

Ian Clayton - Lead Investigator, Ethical Approach UK

Purpose, Scope and Methodology

Purpose

Evidence Bundle No. 3 differs from the preceding bundles.

Evidence Bundle No. 1 reconstructed, from contemporaneous Metropolitan Police records, the documentary chronology relating to Crime Reference Number 6029679/21 between 20 December 2021 and 21 February 2022.

Evidence Bundle No. 2 reconstructed the wider constitutional and operational environment within which that chronology occurred, including the establishment of Operation Talla, the role of the National Police Chiefs' Council, the Criminal Justice System Strategic Command Structure and the nationally coordinated policing response to the COVID-19 pandemic.

The present bundle considers a different question.

Its purpose is to identify the statutory, procedural and constitutional framework governing the handling of evidence, criminal investigation, judicial review proceedings and the duty of candour and to place that framework alongside the documentary record now available concerning CRN 6029679/21.

It is intended to assist the investigating officer by presenting relevant legal materials and documentary evidence in a structured and chronological manner.

Scope

This bundle considers:

- the Criminal Procedure and Investigations Act 1996;
- the Criminal Procedure and Investigations Act Code of Practice;
- the National Police Chiefs' Council's own description of criminal investigation;
- contemporaneous Metropolitan Police records disclosed by Subject Access Request;
- contemporaneous records of national policing consideration of CRN 6029679/21;
- documents placed before the Administrative Court during judicial review proceedings;
- the Treasury Solicitor's Guidance concerning the duty of candour in judicial review proceedings; and
- documentary material subsequently disclosed through Freedom of Information and Subject Access Request processes.

Each document is considered within its chronological and constitutional context.

Methodology

The methodology adopted throughout this bundle is consistent with that adopted in Evidence Bundles Nos. 1 and 2.

The bundle distinguishes carefully between:

- contemporaneous documents;
- later disclosures explaining earlier events;
- statutory provisions;
- judicial authorities;
- administrative guidance; and
- analytical observations.

Where documentary material post-dates the events under consideration, it is relied upon only to explain, illuminate or provide context to contemporaneous events.

The chronology established within Evidence Bundle No. 1 and the constitutional framework reconstructed within Evidence Bundle No. 2 are not repeated except where necessary to explain the significance of particular documents.

Approach

This bundle does not seek to determine criminal liability, civil liability or misconduct. Nor does it invite findings that any individual or institution deliberately acted unlawfully or failed to comply with legal obligations.

Its purpose is more limited.

It identifies the legal framework governing criminal investigation, disclosure and judicial review and considers that framework alongside the documentary record now available.

Where apparent inconsistencies arise between legal principles, contemporaneous records and subsequent public positions, they are identified as evidential matters capable of investigation.

The bundle therefore seeks to assist, rather than replace, the investigative function.

Constitutional Context

The administration of criminal justice depends upon public confidence that criminal allegations are handled in accordance with law, that relevant evidence is properly recorded and retained and that public authorities provide courts with full and accurate explanations of material facts when judicial scrutiny is invoked.

Those principles are reflected within:

- the Criminal Procedure and Investigations Act 1996;
- the Code of Practice issued pursuant to that Act;
- the common law governing judicial review;
- the Treasury Solicitor's Guidance concerning the duty of candour;
and
- the wider constitutional responsibilities resting upon public authorities.

The documents considered within this bundle are examined against that legal and constitutional framework.

Reader Guidance

This bundle should be read sequentially.

The statutory framework is considered first.

The contemporaneous documentary record is then examined.

The position subsequently advanced before the Administrative Court is identified.

Finally, the later documentary disclosures are considered alongside the legal principles governing disclosure and candour.

The reader is respectfully invited to consider the documentary record as a whole before reaching any conclusion.

Document 1

Criminal Procedure and Investigations Act 1996

Code of Practice

Issued pursuant to section 23(1) of the Criminal Procedure and Investigations Act 1996

Revised Code of Practice - March 2015

Chronological Position

The Criminal Procedure and Investigations Act 1996 (CPIA) provides the statutory framework governing the handling of evidential material obtained during criminal investigations conducted by police officers in England and Wales.

The accompanying Code of Practice, issued pursuant to section 23(1) of the Act, prescribes the duties imposed upon investigators, officers in charge of investigations and disclosure officers in relation to the recording, retention and revelation of material obtained during criminal investigations.

Link:

https://ethicalapproach.co.uk/cpia_1996_code_of_practice_approved_260530_133551.pdf

It therefore forms the primary statutory framework considered throughout this Evidence Bundle.

Statutory Purpose

The Code expressly states that its purpose is to prescribe:

"...the manner in which police officers are to record, retain and reveal to the prosecutor material obtained in a criminal investigation which may be relevant to the investigation."

The Code is therefore concerned not simply with disclosure at trial, but with the management of relevant evidential material throughout the investigative process.

It establishes statutory duties relating to the recording, preservation and management of material that may be relevant to criminal investigations.

Definition of a Criminal Investigation

The Code adopts a broad statutory definition of a criminal investigation.

It provides that a criminal investigation includes investigations into crimes believed to have been committed, investigations undertaken to establish whether crimes have been committed with a view to possible criminal proceedings and investigations undertaken where there are grounds for believing that a crime may have been committed.

The statutory definition is therefore wider than investigations that ultimately result in prosecution.

Its focus is the investigative process undertaken to establish whether criminal proceedings should follow.

Statutory Responsibilities

The Code distinguishes between the respective responsibilities of:

- investigators;
- officers in charge of investigations; and
- disclosure officers.

Where those responsibilities are divided between different individuals, the Code requires close consultation and clear allocation of responsibility.

It also requires chief officers of police to ensure that the identities of the officer in charge of the investigation and the disclosure officer are recorded.

The statutory framework therefore recognises that criminal investigations involve identifiable investigative roles and defined responsibilities.

Reasonable Lines of Inquiry

The Code further provides that:

"The investigator should pursue all reasonable lines of inquiry, whether these point towards or away from the suspect."

This obligation reflects one of the central principles underpinning criminal investigation.

The duty is directed towards the impartial pursuit of relevant evidence, irrespective of whether that evidence supports or undermines the allegations under consideration.

Recording and Retention of Material

The Code requires investigators to record information that may be relevant to an investigation in a durable or retrievable form as soon as reasonably practicable.

It also requires the retention of material obtained during criminal investigations where that material may be relevant to the investigation.

The statutory framework therefore recognises that the proper recording and preservation of potentially relevant material forms an integral part of the investigative process.

Documentary Significance

For the purposes of this bundle, the Code of Practice establishes the statutory framework governing:

- the meaning of a criminal investigation;
- the recording of relevant information;
- the retention of evidential material;
- the allocation of investigative responsibility; and
- the pursuit of reasonable lines of inquiry.

The remaining documents contained within this bundle should be read against that statutory framework.

Further Evidential Questions

- What activities constitute a criminal investigation for the purposes of the CPIA?
- At what stage do the statutory duties described within the Code become engaged?
- What distinction does the statutory framework draw between crime recording, criminal investigation and criminal proceedings?
- How should investigative responsibilities be identified and documented?
- How should the statutory duties to record and retain material be considered alongside the contemporaneous documentary record relating to CRN 6029679/21?

Constitutional Relevance

The Criminal Procedure and Investigations Act 1996 represents Parliament's statutory framework governing the conduct of criminal investigations by police forces in England and Wales.

It establishes legal duties concerning the recording, retention and management of evidential material and provides the statutory context against which the documentary record examined in the remainder of this bundle should be considered.

Document 2
National Police Chiefs' Council
Corporate Witness Statement of Assistant Chief
Constable Owen Weatherill
UK Covid-19 Inquiry - Module 5
28 November 2024

Chronological Position

This witness statement was prepared on behalf of the National Police Chiefs' Council (NPCC) for the purposes of the UK Covid-19 Inquiry.

Link:

https://ethicalapproach.co.uk/INQ000520827_260719_045222.pdf

Although prepared after the events considered in Evidence Bundles Nos. 1 and 2, the statement records the NPCC's own description of the principles governing criminal investigation and the investigative responsibilities of police forces.

It is therefore considered immediately after the statutory framework established by the Criminal Procedure and Investigations Act 1996.

Purpose of the Statement

The witness statement was provided in response to Rule 9 requests issued by the UK Covid-19 Inquiry.

Within the statement, Assistant Chief Constable Owen Weatherill explains the role of the NPCC and describes the general principles governing criminal investigations undertaken by police forces in England and Wales.

For the purposes of this bundle, the significance of the statement lies not in its consideration of PPE procurement, but in its explanation of the NPCC's understanding of criminal investigation.

The NPCC's Description of Criminal Investigation

The statement explains that:

"A criminal investigation is instigated when an allegation of crime is made which is considered by the receiving police force to require further enquiry..."

It continues by explaining that the principal purpose of such an investigation is to identify suspects, establish whether offences have been committed and determine whether individuals should be brought before the courts.

The statement therefore provides the NPCC's own explanation of when a criminal investigation is instigated and the objectives that such an investigation is intended to achieve.

Reasonable Lines of Inquiry

The witness statement also records that investigators are expected to pursue:

"...all reasonable lines of enquiry, whether these point towards or away from the suspect."

The statement notes that this principle is reflected within the College of Policing's Authorised Professional Practice and is underpinned by statutory obligation.

This description closely reflects the principle already identified within the CPIA Code of Practice.

National Searches Undertaken

The statement further explains that, for the purposes of preparing evidence for the UK Covid-19 Inquiry, the NPCC contacted police forces across the United Kingdom to determine whether relevant investigations existed.

The statement records the methodology adopted, together with the responses received from individual police forces, including the Metropolitan Police Service and Police Scotland.

For the purposes of this bundle, these passages demonstrate the steps described by the NPCC in gathering information from participating police forces.

Documentary Significance

This witness statement is significant because it records the NPCC's own description of:

- when a criminal investigation is instigated;
- the purpose of criminal investigation;
- the obligation to pursue reasonable lines of inquiry; and
- the methodology adopted by the NPCC when gathering information from police forces for the UK Covid-19 Inquiry.

Read alongside the CPIA Code of Practice, it provides an institutional explanation of investigative principles from the national body representing chief officers of police.

Further Evidential Questions

- In what respects does the NPCC's description of criminal investigation correspond with the statutory definition contained within the CPIA Code of Practice?
- How should the phrase "*requires further enquiry*" be understood in the context of the statutory framework?
- What distinction, if any, exists between preliminary assessment, further enquiry and criminal investigation?
- What investigative activities are contemplated by the NPCC's description of "*further enquiry*"?
- How should these stated principles be considered alongside the contemporaneous Metropolitan Police records relating to CRN 6029679/21?

Constitutional Relevance

The National Police Chiefs' Council is not responsible for defining the law governing criminal investigations. That responsibility rests with Parliament and the courts.

However, this witness statement is of constitutional significance because it records the NPCC's own explanation, given to a statutory public inquiry, of the principles governing criminal investigation and investigative practice.

For the purposes of this bundle, it provides an important institutional reference point before consideration is given to the contemporaneous records concerning CRN 6029679/21.

Document 3
Metropolitan Police Service
Subject Access Request Disclosure
CRN 6029679/21

Chronological Position

The documents considered within this section comprise internal Metropolitan Police records created contemporaneously during the handling of Crime Reference Number 6029679/21 and subsequently disclosed in response to Subject Access Requests.

Unlike the preceding documents, which establish the statutory framework and describe general investigative principles, these records document the Metropolitan Police's own contemporaneous handling of the crime report.

They therefore provide the primary evidential record against which the legal framework identified in Documents 1 and 2 may be considered.

Link:

https://ethicalapproach.co.uk/SAR_CR6029679_21PDF_260325_134829.pdf

Nature of the Record

The disclosed material consists of internal crime management records generated during the handling of CRN 6029679/21.

The records identify:

- the initial screening decision;
- allocation of investigative responsibility;
- supervisory involvement;
- investigative updates;
- classification decisions;
- officer comments;
- and subsequent outcome entries.

As contemporaneous records, they provide direct evidence of the administrative and operational handling of the crime report by the Metropolitan Police Service.

Initial Handling

The SAR records show that the crime report was created on 20 December 2021 following attendance by informants at Hammersmith Police Station.

The records identify:

- "Screening Decision: IN";
- allocation to the AW Basic Command Unit;
- appointment of a Detective Constable as investigating officer;
- later allocation to AWCID; and
- the recording of supervisory responsibility.

These entries form part of the contemporaneous administrative record generated immediately following receipt of the report.

Investigative Record

The investigation log records that the reporting parties attended Hammersmith Police Station with evidence concerning allegations relating to COVID-19 vaccines and stated that they possessed substantial supporting documentation stored on memory devices and in documentary form. The log further records concerns expressed by the informants regarding the alleged suppression of information and the potential public consequences if the matters were not investigated.

On 21 December 2021, a supervising officer recorded the view that the report appeared to constitute a protest rather than a legitimate allegation of crime, whilst also observing that the report contained no description of the evidence said to have been offered by the informants.

On 22 December 2021, the record contains an explicit entry stating:

"Screened In"

Further entries record changes in the Officer in Charge and subsequent transfer of the matter to CID.

Classification Record

The SAR further records that the report was subsequently classified as *"No Crime"*.

The classification record includes the reason:

"Victimless allegation".

The record also identifies the officers responsible for recording and confirming that classification together with the relevant dates.

The documentary chronology therefore records both earlier investigative and administrative activity together with the later classification decision.

Subsequent Entries

The record continues beyond the initial classification.

Among the subsequent entries are:

- attendance by reporting parties seeking to provide additional material;
- a note that regular updates would reduce the need for further attendance;
- an outcome rationale explaining why no investigation would be pursued; and
- supervisory entries recording that legal wording had been provided by the Metropolitan Police Directorate of Legal Services before closure of the matter.

These entries demonstrate that the internal record continued to develop after the initial reporting of the allegations.

Documentary Significance

The purpose of this document is not to characterise the legal status of the activities recorded within the Metropolitan Police system.

It is instead to identify the contemporaneous documentary record generated during the handling of CRN 6029679/21.

Read together, the entries disclose:

- an initial screening decision;
- allocation of investigative responsibility;
- supervisory oversight;
- changes in investigative responsibility;
- transfer to CID;
- subsequent classification decisions;
- continuing administrative activity; and
- involvement of the Metropolitan Police Directorate of Legal Services before closure.

These matters are part of the primary documentary record and provide the factual context for the legal issues considered later in this bundle.

Further Evidential Questions

- What was the operational significance of the recorded "Screening Decision: IN"?
- What was intended by the subsequent "Screened In" entry?
- Why was a Detective Constable identified as the investigating officer?
- What was the purpose of the transfer to CID?

- At what stage did Directorate of Legal Services become involved, and for what purpose?
- How should these contemporaneous records be considered alongside the statutory framework described in Documents 1 and 2?
- What distinction, if any, exists between the activities recorded in the SAR and the later legal characterisation advanced before the Administrative Court?

Constitutional Relevance

This document is the first primary evidential record examined within Part No. 3.

Unlike the statutory materials considered previously, it records what occurred within the Metropolitan Police's own systems during the handling of CRN 6029679/21.

Its significance lies not in the conclusions that may ultimately be drawn from it, but in the fact that it provides the contemporaneous documentary foundation against which later legal submissions, judicial proceedings and disclosure issues can be considered.

Document 4
National Police Chiefs' Council
Chief Constables' Council Minutes
12 January 2022

Chronological Position

The Chief Constables' Council minutes were created during the contemporaneous handling of CRN 6029679/21.

Unlike the Metropolitan Police records examined in Document 3, these minutes record discussion occurring at national policing level whilst the Metropolitan Police's own handling of the crime report remained ongoing.

They therefore provide an important contemporaneous record of national awareness and assessment of the matter.

Link:

https://ethicalapproach.co.uk/14_january_2022_260406_032139.pdf

Documentary Record

The minutes record that Chief Constables were informed that:

"...a crime report was made to the Met..."

The document further records that:

"...the final assessment should be complete next week when a clearer steer can be communicated."

Accordingly, the contemporaneous record demonstrates that, as at 12 January 2022, the existence of CRN 6029679/21 and an associated assessment process were matters recorded within the proceedings of the Chief Constables' Council.

Peer Review

Of particular significance is the action agreed by the Council.

The minutes record:

"Op Talla team to share the results of the peer review assessment relating to the Crime Report submitted to the Met Police..."

The minutes therefore identify:

- the existence of a peer review assessment;
- that the assessment related specifically to the Metropolitan Police crime report;
- that the assessment had produced results capable of being shared; and
- that responsibility for sharing those results rested with the Operation Talla team.

The minutes do not explain the scope of that assessment, the material reviewed, or the methodology adopted.

Relationship to the Metropolitan Police Record

Read alongside the Metropolitan Police SAR records, the Chief Constables' Council minutes demonstrate that, whilst internal Metropolitan Police activity continued, the existence of the crime report was also recognised within a national policing forum.

The two records are distinct.

The Metropolitan Police SAR documents internal handling by the originating force.

The Chief Constables' Council minutes record contemporaneous discussion and assessment at national level.

Together, they contribute to the broader evidential chronology.

Documentary Significance

For the purposes of this bundle, the significance of these minutes lies in the contemporaneous references they contain.

They demonstrate that:

- a Metropolitan Police crime report was recognised within the Chief Constables' Council;
- an assessment process was underway;
- a peer review assessment had been undertaken or commissioned; and
- the results of that assessment were intended to be communicated through Operation Talla.

The minutes do not determine the legal nature of those activities. Rather, they record their existence within the contemporaneous documentary record.

Further Evidential Questions

- Who undertook the peer review assessment referred to in the minutes?
- What material was considered during that assessment?
- What were the conclusions of the assessment?
- To whom were the results communicated?
- How, if at all, did the assessment relate to the Metropolitan Police's own handling of CRN 6029679/21?
- What was the intended purpose of communicating a "*clearer steer*" following completion of the assessment?
- How should the existence of this contemporaneous assessment be considered alongside the statutory framework governing criminal investigation?

Constitutional Relevance

The constitutional significance of these minutes lies not in any conclusion they express, but in the institutional context in which they were created.

They demonstrate that CRN 6029679/21 was the subject of contemporaneous discussion within the National Police Chiefs' Council's principal forum of Chief Constables during the period in which the Metropolitan Police's own handling of the report remained active.

For the purposes of this bundle, the minutes provide an additional contemporaneous documentary source relevant to understanding the wider context in which the crime report was being considered.

The Administrative Court Proceedings

The documents contained within this section concern the judicial review proceedings commenced in the Administrative Court following the Metropolitan Police's handling of CRN 6029679/21.

The purpose of this section is not to reconsider the outcome of those proceedings. Nor is it to invite criticism of the Court.

Instead, it reconstructs the legal position advanced on behalf of the Commissioner of Police of the Metropolis and identifies the propositions upon which that position relied.

Those propositions are considered later in this bundle alongside the statutory framework and the documentary record.

Document 5
Administrative Court
Defendant's Summary Grounds of Resistance
Commissioner of Police of the Metropolis

Chronological Position

The Summary Grounds of Resistance were filed on behalf of the Commissioner during the judicial review proceedings arising from CRN 6029679/21.

The document records the legal position advanced before the Administrative Court concerning the handling of the crime report and the Commissioner's response to the Claimants' case.

It is therefore considered before the Court's judgment and before later disclosure material.

Link:

https://ethicalapproach.co.uk/CO22542023_Summary_Grounds_250804_120308.pdf

Purpose of the Document

The Summary Grounds of Resistance set out the legal basis upon which the Commissioner opposed the application for judicial review.

The document distinguishes between:

- receipt of allegations;
- consideration of evidential material;
- crime recording;
- criminal investigation; and
- the exercise of investigative discretion.

The legal submissions are advanced in support of the Commissioner's contention that the decision challenged by the Claimants was not unlawful.

The Defendant's Position

The Summary Grounds state that material submitted by the complainants was reviewed in order to determine whether it disclosed the commission of criminal offences.

The Defendant contends that this process did not constitute a criminal investigation. Rather, it is argued that the material was considered solely for the purpose of deciding whether the allegations met the threshold for crime recording and whether any criminal investigation should commence.

The Defendant therefore advances a distinction between:

- consideration of information received;
- assessment for crime recording purposes; and
- the commencement of a criminal investigation.

Investigative Discretion

The Summary Grounds further rely upon established public law authority concerning investigative discretion.

Reference is made to authorities including:

- R (Soma Oil & Gas Ltd) v Director of the Serious Fraud Office; and
- R (Corner House Research) v Director of the Serious Fraud Office,

in support of the proposition that decisions whether to investigate are matters in which the courts will intervene only in limited circumstances.

The document therefore places reliance upon the well-established principle that decisions concerning criminal investigation ordinarily fall within the operational discretion of police authorities.

The Role of the COVID-19 Inquiry

The Defendant also submits that many of the matters raised by the Claimants fell within the remit of the UK Covid-19 Inquiry.

The Summary Grounds state that the Inquiry provided the appropriate forum for examining wider issues relating to the Government's response to the pandemic and indicate that, depending upon the Inquiry's findings, the Metropolitan Police could reconsider whether any criminal investigation should be commenced.

Documentary Significance

For the purposes of this bundle, the Summary Grounds are significant because they identify the factual and legal propositions advanced on behalf of the Commissioner before the Administrative Court.

In particular, the document advances propositions concerning:

- the distinction between evidential review and criminal investigation;
- the purpose of the Metropolitan Police's consideration of the allegations;
- the exercise of investigative discretion; and
- the legal basis upon which judicial review was resisted.

These propositions form an important part of the constitutional chronology examined within this bundle.

Further Evidential Questions

- Upon what contemporaneous documentary material were the factual propositions contained within the Summary Grounds based?
- What records were reviewed before those propositions were advanced to the Court?
- How should the distinction drawn between evidential assessment and criminal investigation be considered alongside the CPIA Code of Practice?
- How should that distinction be considered alongside the contemporaneous Metropolitan Police SAR records?

- What information concerning CRN 6029679/21 was available to those responsible for settling the Summary Grounds?

Constitutional Relevance

The constitutional significance of the Summary Grounds lies in the fact that they record the legal position advanced by a public authority before the Administrative Court.

The purpose of this bundle is not to determine whether those submissions were correct or incorrect.

Instead, it is to identify the legal case presented to the Court before later considering the statutory framework, the contemporaneous documentary record and the subsequent disclosure material examined elsewhere within this bundle.

Document 6
Administrative Court
Decision of the Honourable Mr Justice Poole
17 November 2023

Chronological Position

This document records the decision of the Administrative Court upon the Claimants' application for permission to apply for judicial review.

The Court considered:

- the Claimants' application;
- the Defendant's Acknowledgement of Service and Summary Grounds of Resistance; and
- the Claimants' Reply.

Following consideration of those documents, the Court refused permission to apply for judicial review and certified the claim as totally without merit.

Link:

https://ethicalapproach.co.uk/AC_2023_LON_001880_1_250803_133225.pdf

The Court's Decision

The Order records that:

- permission to apply for judicial review was refused;
- the application was certified as totally without merit;
- Fundamental Freedom was discharged as an Interested Party; and
- costs were awarded in favour of the Commissioner of Police of the Metropolis.

The Court therefore determined the application without granting permission for the substantive claim to proceed.

Reasons Given

The written reasons identify several principal grounds for refusing permission.

Firstly, the Court concluded that the claim disclosed no arguable grounds for judicial review with a realistic prospect of success.

Secondly, the Court concluded that the claim had been commenced out of time, holding that the Metropolitan Police had made a clear and definitive decision by 18 May 2022 not to record the complaints as crimes.

Thirdly, the Court referred to established authority concerning investigative discretion, observing that decisions whether to investigate face a "*very high hurdle*", citing *R (Corner House Research) v Director of the Serious Fraud Office* and *R (Soma Oil & Gas Ltd) v Director of the Serious Fraud Office*.

The Court's Approach

The Court further concluded that the Commissioner had been entitled to determine that the reported circumstances did not disclose criminal activity on the balance of probabilities, having regard to the information available and the wider scientific and governmental context identified within the Defendant's case.

The Court also rejected the proposition that the Metropolitan Police were under a legal duty to investigate every report of crime, stating that such a proposition was "*clearly not so*" for the reasons advanced by the Defendant.

Documentary Significance

This document records the Administrative Court's determination of the judicial review application.

It establishes:

- the outcome of the proceedings;
- the principal reasons given for refusing permission;
- the authorities upon which the Court relied; and
- the legal context in which the Court considered the Defendant's position.

For the purposes of this bundle, the significance of the judgment lies in identifying the issues that were determined upon the material then before the Court.

Further Evidential Questions

- What documentary material formed part of the evidential basis upon which the Court reached its decision?
- What contemporaneous records concerning CRN 6029679/21 were available at the time the proceedings were determined?
- What documentary material emerged only after the conclusion of the judicial review proceedings?
- How should subsequently disclosed material be understood within the chronology established by this bundle?
- What relevance, if any, do later disclosures have when considering the documentary history of CRN 6029679/21?

Constitutional Relevance

The Administrative Court determined the judicial review application on the basis of the material placed before it by the parties.

The Court's constitutional function was to determine the application by applying established principles of public law to the evidence and submissions available at that time.

This bundle does not seek to revisit or challenge that judicial determination.

The judgment forms an important part of the documentary chronology because it establishes the legal position reached by the Court before consideration is given to the separate constitutional principles governing the duty of candour and the later documentary disclosures examined in the following sections.

The Constitutional Duty of Candour

The documents contained within this section concern the constitutional obligations resting upon public authorities engaged in judicial review proceedings.

Unlike the preceding sections, these documents do not concern criminal investigation. Rather, they concern the proper administration of justice and the obligation of public authorities to assist the Administrative Court by ensuring that material facts and relevant information are accurately and fully presented.

The purpose of this section is to identify those constitutional obligations before considering the significance of documentary material disclosed after the conclusion of the judicial review proceedings.

Document 7

Treasury Solicitor

Guidance on Discharging the Duty of Candour and Disclosure in Judicial Review Proceedings

Chronological Position

This guidance was issued to assist Government departments and other public authorities in discharging their constitutional obligations during judicial review proceedings.

Although not legislation, the guidance explains established principles derived from the common law concerning the duty of candour owed by public authorities to the Administrative Court.

It therefore provides the constitutional framework governing the presentation of information before the Court.

Link:

https://ethicalapproach.co.uk/duty_of_candour_official_government_publication.pdf

Constitutional Purpose

The guidance explains that public authorities do not participate in judicial review proceedings as ordinary civil litigants. Rather, they are expected to assist the Court in reaching the correct decision by ensuring that the Court is provided with full and accurate

explanations of all material facts relevant to the issues requiring determination.

The guidance therefore identifies the duty of candour as a constitutional obligation arising from the special position occupied by public authorities.

The Nature of the Duty

The guidance records the well-known observations of Lord Donaldson MR in *R v Lancashire County Council ex parte Huddleston*.

Judicial review is described as a process in which:

"...the cards face upwards on the table..."

The Court and the public authority are expected to work upon the basis that relevant facts are placed openly before the Court so that the legality of public decision-making may properly be examined.

Information Rather Than Documents

The guidance emphasises an important constitutional distinction.

The duty of candour is described as an obligation to provide information, not merely to disclose documents.

It therefore requires public authorities to ensure that relevant factual information is accurately communicated to the Court, whether or not particular documents are specifically requested.

The guidance further explains that the obligation extends to information that may assist the claimant's case as well as the public authority's own position.

Continuing Obligation

The guidance explains that the duty of candour:

- arises from the outset of judicial review proceedings;
- continues throughout those proceedings;
- extends to witness statements, pleadings and submissions;
- and requires further relevant information to be provided promptly should it later come to light.

The obligation is therefore described as continuing rather than static.

Documentary Significance

For the purposes of this bundle, the guidance establishes the constitutional framework governing:

- the presentation of factual information before the Administrative Court;
- the continuing nature of the duty of candour;
- the distinction between disclosure of documents and disclosure of relevant information; and
- the obligation upon public authorities to assist the Court in reaching the correct legal conclusion.

These principles provide the constitutional context within which the final section of this bundle considers documentary material disclosed after the conclusion of the judicial review proceedings.

Further Evidential Questions

- What information concerning CRN 6029679/21 was available to the Metropolitan Police during the judicial review proceedings?
- What searches were undertaken before the Summary Grounds of Resistance were settled?
- Were all relevant sources of information identified and considered?
- What documentary material emerged only after the proceedings had concluded?
- How should later-disclosed information be considered in light of the continuing constitutional principles described within this guidance?

Constitutional Relevance

The constitutional significance of this guidance extends beyond the particular circumstances of CRN 6029679/21.

It articulates the principles governing the relationship between public authorities and the Administrative Court.

Those principles exist to ensure that judicial review is conducted upon the basis of accurate, complete and fair presentation of relevant information.

The remaining documents contained within this bundle are not examined for the purpose of determining whether those obligations were fulfilled in this case. They are considered because they form part of the documentary chronology which became available following the conclusion of the judicial review proceedings and are therefore capable of informing any subsequent consideration of the evidential history of CRN 6029679/21.

Subsequent Documentary Disclosures

The documents contained within this section were not before the Administrative Court when the judicial review proceedings were determined.

Some documents were created after the proceedings had concluded.

Others existed contemporaneously but were disclosed only subsequently through Freedom of Information requests, Subject Access Requests or other disclosure processes.

The purpose of this section is not to determine the legal significance of those documents. Instead, it is to identify their place within the documentary chronology and to consider whether they contribute to the evidential history of CRN 6029679/21.

Document 8
Subsequent Documentary Disclosures
National Police Chiefs' Council
Metropolitan Police
Police Scotland

Chronological Position

Following the conclusion of the judicial review proceedings, a substantial body of additional documentary material entered the public domain.

That material included:

- Freedom of Information disclosures;
- Subject Access Request disclosures;
- internal operational communications;
- Chief Constables' Council records;
- Police Scotland disclosures; and
- National Police Chiefs' Council internal review material.

Taken collectively, these disclosures provide additional documentary context concerning the handling of CRN 6029679/21 and the wider operational environment within which that handling occurred.

Evolution of the Documentary Record

The documentary chronology demonstrates that the evidential record available concerning CRN 6029679/21 continued to evolve after the judicial review proceedings had concluded.

- Subsequent disclosures included:
- Metropolitan Police internal crime management records;
- Chief Constables' Council minutes referring to the Metropolitan Police crime report;
- National Police Chiefs' Council operational communications;
- Police Scotland's Freedom of Information disclosures concerning the provenance of the Speirs Directive;
- National Police Chiefs' Council internal review material; and
- internal communications describing nationally issued guidance concerning the recording of reports.

These materials form part of the subsequent documentary history.

The NPCC Internal Review

One significant development concerned the National Police Chiefs' Council's own internal review of earlier Freedom of Information responses.

Following that review, the NPCC accepted that recorded information falling within the scope of the request was held and disclosed further contemporaneous operational material.

Those disclosures included briefing notes, operational communications and internal correspondence concerning nationally coordinated responses during Operation Talla.

Link:

https://ethicalapproach.co.uk/NPCC_FOI_disclosures.pdf

The documentary chronology therefore records an evolution in the information subsequently disclosed concerning those events.

Internal Operational Communications

Among the material subsequently disclosed are internal operational communications referring to nationally issued guidance concerning the recording of reports.

One internal communication records the assessment that:

“...the guidance to not record has been a success.”

Link:

https://ethicalapproach.co.uk/a4_FW_Full_Fact_Time_sensitive_false_claims_of_live_i_250715_164048.pdf

The document records that statement as part of an internal discussion concerning operational guidance.

For the purposes of this bundle, no conclusion is drawn concerning the meaning or legal effect of that assessment.

It is identified solely because it forms part of the subsequent documentary record.

Metropolitan Police Subject Access Request Material

The Metropolitan Police Subject Access Request disclosures similarly expanded the documentary record available concerning CRN 6029679/21.

Those disclosures revealed additional internal records concerning:

- screening decisions;
- investigative allocation;
- supervisory involvement;
- Directorate of Legal Services engagement;
- and the continuing administrative handling of the crime report.

Link:

https://ethicalapproach.co.uk/SAR_CR6029679_21PDF_260325_134829.pdf

Those records have already been considered in earlier sections of this bundle.

Their significance within this section lies in the fact that they became available after the judicial review proceedings had concluded.

Documentary Significance

The purpose of this section is not to determine the legal consequences of the later disclosures. It instead identifies the development of the documentary record over time.

Read collectively, the subsequent disclosures demonstrate that the evidential record concerning CRN 6029679/21 did not remain static following the conclusion of the judicial review proceedings.

Additional contemporaneous documents became available through subsequent disclosure processes.

That chronology forms an important part of the overall evidential history.

Further Evidential Questions

- Which of the subsequently disclosed documents existed at the time of the judicial review proceedings?
- Which documents were created only after those proceedings had concluded?
- What searches were undertaken to identify relevant material before the Defendant's evidence was settled?
- What additional information became available through later Freedom of Information and Subject Access Request disclosures?
- How should the evolving documentary record be considered when reconstructing the complete evidential history of CRN 6029679/21?
- Are there further contemporaneous records that remain unidentified or undisclosed?

Constitutional Relevance

The constitutional significance of the subsequent disclosures lies not in the conclusions that may ultimately be drawn from them, but in the fact that they demonstrate that the documentary record

continued to develop after the conclusion of the judicial review proceedings.

Whether those later disclosures have any legal significance is not a matter determined within this bundle.

They are identified because they form part of the complete documentary chronology now available concerning CRN 6029679/21.

Observations

The documents considered within this bundle originate from different sources, were created for different purposes and were disclosed at different stages. They should not be viewed in isolation.

Their evidential significance lies in the extent to which, when read together and in chronological order, they contribute to a fuller understanding of the documentary history of CRN 6029679/21.

Whether that chronology ultimately gives rise to further investigative, legal or constitutional questions is a matter for those exercising the relevant statutory functions.

Reflection on Part 3

Evidence Bundle No. 3 has sought to identify the legal framework governing criminal investigation, the position advanced before the Administrative Court, the constitutional duty of candour and the subsequent evolution of the documentary record relating to CRN 6029679/21.

It does not invite findings of misconduct, unlawfulness or breach of duty. Those are matters for others.

Its purpose has been to reconstruct the legal and evidential landscape as it now stands, distinguishing carefully between contemporaneous records, later disclosures and constitutional principles.

Whether the documents now available alter, illuminate or simply supplement the understanding of events as they appeared during the judicial review proceedings is itself a matter capable of careful and independent consideration.

The bundle is respectfully provided in that spirit.

Ian Clayton

23 July 2026

PART No. 4

CRN 6029679/21

The Closure Letter of 21 February 2022

**A Forensic Examination of the Scope,
Accuracy and Evidential Basis of the
Decision to Close the Report**

Compiled by

Ian Clayton - Lead Investigator, Ethical Approach UK

Purpose of this Bundle

This is the fourth and final part of a four-part evidential report concerning Metropolitan Police reference CRN 6029679/21.

Evidence Bundle No. 1 reconstructed the contemporaneous handling chronology.

Evidence Bundle No. 2 examined the wider national policing and command context within which the report was received and handled.

Evidence Bundle No. 3 considered the statutory and public-law framework relevant to criminal investigation, evidence, judicial review and the duty of candour.

This final bundle examines the Metropolitan Police closure letter dated 21 February 2022.

That letter represented the formal communication of the Metropolitan Police position that:

- the allegations had no basis in the available evidence;

- no criminal offences were apparent;
- there was insufficient evidence to pursue an investigation;
- no further action would be taken; and
- the complaint would not be recorded as a crime.

The purpose of this bundle is not to determine whether any person committed a criminal offence, nor to make findings of professional or institutional misconduct.

Its purpose is narrower and evidential. It is to examine whether the closure letter:

- accurately described the complaint reported on 20 December 2021;
- addressed the complaint in its entirety;
- accurately stated the factual and regulatory matters upon which it relied;
- identified an adequate evidential basis for the conclusions expressed;
- engaged with the offences and evidence actually presented;
- distinguished between the separate elements of the complaint;
- explained why further enquiry was considered unnecessary; and
- provided a complete and coherent basis for the decision to close CRN 6029679/21.

The Central Question

The principal question examined in this bundle is:

Did the closure letter of 21 February 2022 provide a complete, accurate and reasoned determination of the complaint reported to the Metropolitan Police on 20 December 2021?

That question requires more than an examination of whether individual sentences within the letter were literally correct.

It requires comparison between:

- the complaint which was made;
- the evidence which was supplied;
- the allegations and offences identified;
- the contemporaneous handling record;
- the matters addressed in the closure letter; and
- the conclusions ultimately expressed.

A closure decision may contain individually accurate statements and yet fail to determine the complaint before the decision-maker if those statements address only part of it.

The scope of the complaint must therefore be established before the adequacy of the closure letter can properly be assessed.

Scope of the Original Complaint

The complaint reported on 20 December 2021 was not confined to the safety, approval or deployment of COVID-19 vaccines.

It comprised eight distinct evidential elements or modules.

Vaccines formed one component of the overall report.

The closure letter, however, described the matter in its subject heading as:

“Allegations relating to the suppression of information regarding the severity of health implications from the Covid 19 vaccine by persons in parliament and other organisations.”

Its opening paragraph similarly characterised the report as allegations:

“concerning COVID 19 vaccines.”

The substantive reasons that followed referred exclusively to:

- vaccine approval;
- vaccine trials;
- vaccine safety processes;
- international vaccine use; and
- the alleged suppression of information concerning vaccine-related health implications.

This creates an immediate question of scope:

Did the closure letter address all eight elements of the complaint, or did it address only the vaccine-related element?

This bundle will first reconstruct what required determination before examining what determination was actually communicated.

Methodology

The closure letter will be examined sequentially and proposition by proposition.

Each material passage will be considered under the following headings:

1 Text of the Letter

The relevant wording will be reproduced verbatim.

2 Proposition Advanced

The factual, evidential or legal proposition expressed by the author will be identified.

3 Scope

The analysis will identify which element or elements of the complaint the proposition addresses and which, if any, it does not address.

4 Evidential Foundation

The apparent evidential basis of the proposition will be examined.

Where the letter does not identify its evidential source, that absence will be recorded without speculation.

5 Documentary Comparison

The proposition will be compared with the contemporaneous and subsequently disclosed documents considered in Evidence Bundles Nos. 1–3.

Later disclosure will not be treated as if it were necessarily available to the author on 21 February 2022. It will instead be used to illuminate the recorded handling history and to identify matters requiring clarification.

6 Accuracy and Qualification

The analysis will consider whether the proposition was:

- accurate;
- technically accurate but incomplete;
- expressed in language wider than the underlying legal or regulatory position;
- materially qualified by other evidence; or
- unsupported by an identified evidential basis.

7 Material Omission

The analysis will identify any substantial element of the complaint, evidence or decision-making process not addressed in the relevant passage.

8 Questions Arising

The section will conclude with questions that may properly require investigative clarification.

No adverse inference will be drawn merely because a matter is not explained within the letter.

The Closure Letter as a Decision Document

The letter must be examined not merely as correspondence but as the document communicating the final decision concerning CRN 6029679/21.

The relevant questions therefore include whether it:

- accurately identified the subject matter requiring determination;
- identified the evidence considered;
- distinguished between the eight elements of the report;
- addressed each alleged offence;
- explained the evidential test applied;
- distinguished the crime-recording decision from the decision not to investigate further;
- explained why further reasonable enquiry was unnecessary;
- identified the basis upon which no criminal offence was said to be apparent; and
- provided sufficient reasons to permit the decision to be understood and, where appropriate, challenged.

Particular Treatment of Vaccine “Approval”

The assertion that the relevant vaccines had been “approved” will require a discrete regulatory analysis.

The word approved was used in the letter as a general expression, but the regulatory position on 21 February 2022 involved legally distinct mechanisms.

By that date, relevant products could be subject to:

- a temporary authorisation under Regulation 174 of the Human Medicines Regulations 2012;
- a Conditional Marketing Authorisation;
- an Emergency Use Listing by the World Health Organization; or
- an authorisation operating through the European regulatory system.

Those mechanisms were not legally identical.

For example,

- the MHRA records that Pfizer/BioNTech vaccine stocks had initially been supplied under Regulation 174, while the product also held a Conditional Marketing Authorisation and;
- remaining Regulation 174 stocks were due to expire at the end of February 2022.
- The Great Britain conditional authorisation was not converted into a full marketing authorisation until November 2022.
- The AstraZeneca vaccine received a Great Britain Conditional Marketing Authorisation on 24 June 2021, after earlier supply under Regulation 174.
- The World Health Organization did not grant a United Kingdom marketing authorisation. Its Emergency Use Listing procedure assessed and listed products for emergency use and assisted national authorities and procurement bodies in determining acceptability.
- WHO itself described EUL as a procedure concerning products that may remain unlicensed and states that Member States retain authority to permit use domestically.

Accordingly, the regulatory inquiry will distinguish between: (1) whether a vaccine had received some form of regulatory or emergency-use authorisation and (2) whether it had received an ordinary or full marketing authorisation.

It will also consider a separate question:

Even where a vaccine had been lawfully authorised, what did that fact establish concerning allegations of Gross Negligence Manslaughter, Misconduct in Public Office, suppression of information, or the other seven elements of the complaint?

Regulatory status may have been relevant evidence.

It could not however, without further analysis, be treated as determinative of every allegation contained within CRN 6029679/21.

What Decision Was Required?

The crime report made to the Metropolitan Police on 20 December 2021 was not confined to allegations concerning COVID-19 vaccines.

It comprised eight distinct but interrelated evidential modules, each alleging conduct said to give rise to consideration of criminal offences including, amongst others, Gross Negligence Manslaughter and Misconduct in Public Office.

For the purposes of this bundle, the eight modules may be summarised as follows:

Module 1

Origin and Alleged Suppression of Information Concerning the Pathogen

Allegations concerning the origin of the SARS-CoV-2 pathogen and the alleged concealment or suppression of information relevant to its development and dissemination.

Module 2

Diagnostic Testing

Allegations that diagnostic testing methodology was employed or represented in a manner which materially exaggerated the perceived public health risk.

Module 3

Iatrogenic Harm

Allegations concerning avoidable harm arising from clinical interventions, including the use of Midazolam, mechanical ventilation, Do Not Attempt Resuscitation (DNAR) decisions and associated healthcare practices.

Module 4

Non-Pharmaceutical Interventions

Allegations concerning the physical and psychiatric consequences associated with lockdown measures, social isolation, masking and other non-pharmaceutical interventions.

Module 5

Toxic Psychology

Allegations concerning the deliberate or reckless use of psychological techniques said to influence public perception, behaviour and decision-making during the pandemic.

Module 6

Suppression of Alternative Treatments

Allegations concerning the suppression, discouragement or obstruction of alternative therapeutic interventions, including ivermectin and other proposed treatments.

Module 7

Regulatory Action Against Dissent

Allegations concerning the use of regulatory and professional disciplinary mechanisms to suppress scientific, medical or professional dissent.

Module 8

Vaccine Rollout

Allegations concerning the authorisation, deployment, safety monitoring and communication surrounding the COVID-19 vaccination programme.

These eight modules formed the complaint reported on 20 December 2021.

Whilst each addressed different factual subject matter, together they constituted a single crime report assigned Metropolitan Police reference CRN 6029679/21.

This bundle does not seek to evaluate the evidential merits of each module individually. It instead identifies the scope of the complaint requiring determination.

The detailed evidential basis supporting each module was submitted separately by the complainants during the handling of CRN 6029679/21.

Should the present investigation require detailed examination of that underlying evidential material, it is understood that this remains available from two of the original complainants, Mr Philip Hyland and Mr Mark Sexton.

The purpose of setting out these modules is not to revisit their evidential content, but to provide the benchmark against which the scope and adequacy of the Metropolitan Police closure letter dated 21 February 2022 may properly be assessed.

The Scope of the Closure Letter

The first task is not to determine whether the conclusions expressed within the closure letter were correct.

It is first to establish what decision the letter purported to make.

Link:

https://ethicalapproach.co.uk/closure_letter_21022022.jpg

This requires comparison between the scope of the complaint reported on 20 December 2021 and the scope of the matters addressed within the letter itself.

The complaint assigned Metropolitan Police reference CRN 6029679/21 comprised eight separate evidential modules concerning distinct areas of alleged criminality.

Those modules ranged from allegations concerning the origin of the SARS-CoV-2 pathogen through to matters concerning diagnostic testing, healthcare interventions, psychological operations, regulatory conduct, suppression of alternative treatments and, finally, the COVID-19 vaccination programme.

Against that background, the closure letter of 21 February 2022 opens with the following subject heading:

"Allegations relating to the suppression of information regarding the severity of health implications from the Covid-19 vaccine by persons in Parliament and other organisations."

The opening paragraph then continues:

"I am writing regarding the allegations of crime made by yourself and others against a number of people in roles within Parliament and other organisations concerning COVID-19 vaccines."

These two introductory passages immediately establish the scope through which the complaint was characterised by the author of the letter.

Rather than describing the complaint as comprising eight distinct evidential modules, the letter identifies it solely by reference to allegations concerning COVID-19 vaccines and the alleged suppression of information relating to vaccine safety.

From its opening sentence, therefore, the closure letter adopts a description which appears materially narrower than the complaint reported on 20 December 2021.

That observation does not, of itself, establish that the subsequent decision was incorrect. It does, however, give rise to an important evidential question.

Question Arising

Did the closure letter determine the entirety of CRN 6029679/21, or did it determine only the vaccine-related element of that complaint?

The answer to that question is central to the remainder of this bundle.

If the complaint under consideration was, in fact, confined to vaccine-related allegations, then the subsequent reasoning within the letter may properly be examined against that narrower scope.

If, however, the complaint comprised the eight evidential modules summarised previously in this paper, it becomes necessary to examine whether the remaining seven modules were determined elsewhere, remained undetermined, or were implicitly treated as falling within the reasoning expressed in the closure letter.

The closure letter itself does not expressly identify which of those possibilities applied.

Accordingly, before considering the factual accuracy of the individual statements contained within the letter, it is first necessary to determine whether the document accurately identified the subject matter requiring determination.

Analysis of the Closure Letter

Paragraph 1

The opening substantive paragraph of the closure letter states:

"I am writing regarding the allegations of crime made by yourself and others against a number of people in roles within Parliament and other organisations concerning COVID-19 vaccines. These allegations were initially made at Hammersmith Police Station on 20th December 2021 and have been the subject of extensive review by the Metropolitan Police."

Proposition Advanced

This paragraph advances four distinct propositions:

- that the complaint concerned COVID-19 vaccines;
- that it was made by the complainants on 20 December 2021;
- that it concerned persons in Parliament and other organisations;
and
- that it had been the subject of an extensive review by the Metropolitan Police.

Each proposition requires separate consideration.

Scope of the Complaint

The first proposition immediately raises an issue of scope.

As summarised earlier in this report, CRN 6029679/21 comprised eight separate evidential modules.

Only one of those modules related specifically to the COVID-19 vaccination programme.

The remaining modules concerned matters including:

- the origin of the SARS-CoV-2 pathogen;
- diagnostic testing;
- healthcare interventions;
- non-pharmaceutical interventions;
- psychological operations;
- suppression of alternative treatments; and
- the use of regulatory processes in relation to professional dissent.

Accordingly, whilst the complaint undoubtedly included allegations relating to vaccines, it was not confined to that subject.

The opening sentence of the closure letter therefore appears to describe the complaint in terms materially narrower than the complaint reported on 20 December 2021.

Accuracy

The statement that allegations concerning vaccines formed part of the complaint appears accurate.

However, describing the complaint simply as one "*concerning COVID-19 vaccines*" does not appear to reflect its full scope.

The distinction is important.

A decision-maker addressing only one element of a broader complaint may reach conclusions which are entirely sound in relation to that element whilst leaving other elements undetermined.

Whether that occurred in this case is one of the principal questions examined within this bundle.

The Statement that the Matter Had Been Subject to "extensive review"

The second significant proposition is that the allegations had been the subject of an "*extensive review by the Metropolitan Police.*"

Unlike the opening description of the complaint, this statement concerns the process adopted by the Metropolitan Police rather than the subject matter of the allegations.

The letter does not explain:

- the nature of that review;
- its duration;
- who conducted it;
- what material was reviewed;
- what investigative methodology, if any, was employed;
- whether specialist advice was obtained;
- whether witnesses were spoken to;

- whether evidential lines of enquiry were pursued; or
- how the review differed from a criminal investigation.

Accordingly, the expression "*extensive review*" is descriptive rather than explanatory.

The reader is informed that such a review occurred but is provided with no information enabling its scope or significance to be understood.

Documentary Comparison

The documentary record reconstructed in Evidence Bundles Nos. 1 to 3 demonstrates that the handling of CRN 6029679/21 involved a number of recorded procedural steps, including screening decisions, detective involvement, supervisory oversight, legal services engagement and other administrative activity.

Whether those matters collectively constituted the "*extensive review*" referred to in the closure letter is not explained. Nor does the letter distinguish between administrative review, evidential assessment, legal advice and criminal investigation.

That distinction assumes particular importance because those processes are not synonymous and carry different procedural and legal implications.

Questions Arising

The opening paragraph gives rise to the following questions:

- Why was the complaint described solely by reference to COVID-19 vaccines when the reported complaint comprised eight evidential modules?
- What was meant by the expression "*extensive review*"?
- Who conducted that review?
- What material was considered during it?
- Did the review encompass all eight modules of the complaint, or only the vaccine-related allegations?
- How, if at all, did the review differ from the investigative activity identified elsewhere within the contemporaneous handling record?

Paragraph 2

The Regulatory Foundation of the Decision

The closure letter continues:

"The allegations essentially amount to a suggestion that people have either deliberately or recklessly concealed the safety implications of COVID-19 vaccines, despite knowledge that those vaccines would result in serious injury and death."

Proposition Advanced

This paragraph advances an important proposition.

It characterises the complaint as alleging that individuals deliberately or recklessly concealed information concerning the safety of COVID-19 vaccines whilst knowing that those vaccines would result in serious injury or death.

Unlike the opening paragraph, this passage no longer merely describes the subject matter.

It describes what the author understood the allegations themselves to be.

Scope

This again raises an important question concerning scope.

The allegations described in this paragraph relate exclusively to vaccine safety and alleged concealment of vaccine-related information.

They do not refer to the remaining evidential modules identified earlier, including:

- pathogen origin;
- diagnostic testing;
- healthcare interventions;
- non-pharmaceutical interventions;
- psychological operations;
- suppression of alternative treatments; or
- regulatory action against dissent.

Accordingly, the reasoning continues to proceed on the basis of a complaint defined exclusively by reference to vaccines.

The letter does not explain whether the remaining elements of CRN 6029679/21 had already been determined, were regarded as irrelevant, or were considered to fall within the same reasoning.

Evidential Foundation

This paragraph also raises a further evidential question.

The author summarises what is described as the essence of the complaint. However, the letter does not explain:

- how that summary was derived;
- which evidence was examined;
- whether written submissions were reviewed in their entirety;

- whether the complainants' evidential structure was adopted; or
- whether this was simply the Metropolitan Police's own characterisation of the complaint.

Whilst the paragraph explains how the Metropolitan Police understood the allegations, it does not identify the evidential basis upon which that understanding was reached.

Documentary Comparison

The contemporaneous record reconstructed in Evidence Bundle No. 1 demonstrates that substantial documentary material was submitted following the initial report.

That material extended considerably beyond vaccine authorisation or vaccine safety.

The description contained within this paragraph therefore appears considerably narrower than the evidential scope reconstructed from the handling record.

Whether that narrowing occurred intentionally or simply for the purposes of summarising the complaint is not explained within the letter.

Questions Arising

This paragraph gives rise to the following questions:

- Does this paragraph accurately summarise the complaint made on 20 December 2021?

- Was it intended to summarise only Module 8, or the entirety of CRN 6029679/21?
- If it was intended to summarise the entire complaint, upon what evidential basis was that summary formulated?
- How were the remaining seven evidential modules addressed within the decision-making process?

Transitional Observation

This paragraph also performs another important function.

It establishes the factual premise upon which the remainder of the closure letter is built.

The subsequent paragraphs seek to explain why the Metropolitan Police considered those allegations unsustainable, principally by reference to the regulatory status of COVID-19 vaccines, the processes by which they were authorised and the systems in place for monitoring their safety.

It is therefore essential, before considering the conclusions expressed later in the letter, to establish with precision the legal and regulatory status of COVID-19 vaccines as it stood on 21 February 2022.

That regulatory position should not be assumed from the general expression "*approved*".

Importantly, it requires careful examination of the distinct legal mechanisms then operating, including temporary authorisations,

conditional marketing authorisations and the role of the World Health Organization.

The Regulatory Status of COVID-19 Vaccines as at 21 February 2022

Introduction

Before considering the accuracy of the statements contained within the closure letter concerning the approval of COVID-19 vaccines, it is necessary first to establish the regulatory position as it existed on 21 February 2022.

This chapter does not seek to express any view regarding the safety, efficacy or clinical value of COVID-19 vaccines. Nor does it seek to determine whether any criminal offence was committed.

Its purpose is considerably narrower.

It is to establish the precise legal and regulatory status of the vaccines at the date upon which the Metropolitan Police reached the decision to close CRN 6029679/21.

Only once that position has been established is it possible to assess the accuracy and significance of the statements made within the closure letter.

The Importance of Precise Terminology

The closure letter states:

"The relevant vaccines have been approved by the World Health Organization, the European Medicines Agency and the Medicines and Healthcare products Regulatory Agency."

At first reading, that statement appears straightforward. However, the regulatory systems operated by those three organisations were materially different.

The expression "*approved*" is capable of describing several distinct legal mechanisms.

For example, a medicinal product may have been:

- temporarily authorised for emergency supply;
- granted a Conditional Marketing Authorisation;
- granted a standard (full) Marketing Authorisation;
- included within the World Health Organization's Emergency Use Listing programme.

Those mechanisms are not legally identical and should not be treated as interchangeable.

Accordingly, throughout this chapter, the specific regulatory terminology used by the relevant authorities will be adopted wherever possible.

The Position of the MHRA

By 21 February 2022, COVID-19 vaccines used within Great Britain were subject to marketing authorisations issued by the Medicines and Healthcare products Regulatory Agency (MHRA).

However, those authorisations had evolved over time.

The earliest deployment of vaccines occurred under temporary emergency powers contained within Regulation 174 of the Human Medicines Regulations 2012.

Subsequently, products transitioned to Conditional Marketing Authorisations (CMAs).

A Conditional Marketing Authorisation differs from a standard or full marketing authorisation. It permits supply subject to continuing regulatory obligations, including the ongoing provision and assessment of further data.

Accordingly, whilst vaccines were lawfully authorised for use, the regulatory framework under which that authorisation existed remained distinct from the ordinary marketing authorisation process applicable to many established medicinal products.

The Position of the European Medicines Agency

Within the European Union, COVID-19 vaccines were authorised through Conditional Marketing Authorisations issued following assessment by the European Medicines Agency.

Again, those authorisations were legally valid.

However, they were conditional authorisations granted within a statutory regulatory framework designed to permit earlier availability whilst continuing obligations regarding data collection and regulatory review remained in place.

They were therefore not identical to unconditional marketing authorisations.

The Position of the World Health Organization

The World Health Organization occupied a different regulatory position.

Unlike the MHRA, it does not grant United Kingdom marketing authorisations. Instead, it operates the Emergency Use Listing (EUL) procedure.

The purpose of that procedure is to assess products for emergency use and assist Member States and international procurement agencies in determining whether emergency deployment may be appropriate.

Accordingly, the WHO did not "*approve*" vaccines in the same legal sense as a national medicines regulator granting a domestic marketing authorisation.

Its Emergency Use Listing performed a different regulatory function.

Observations

The statement contained within the closure letter that vaccines had been "*approved*" was therefore capable of encompassing several legally distinct regulatory mechanisms.

Whilst the products had received regulatory authorisations permitting their deployment, the legal basis for those authorisations differed between jurisdictions and organisations.

The use of the single word "*approved*" therefore simplifies what was, in reality, a more nuanced regulatory landscape.

That observation does not suggest that the statement was necessarily false. Rather, it recognises that the regulatory position

was more complex than the language employed within the closure letter might initially suggest.

Relevance to CRN 6029679/21

A separate question then arises.

Even if every regulatory statement contained within the closure letter were accepted as factually accurate, what relevance did those regulatory approvals have to the allegations reported under CRN 6029679/21?

The complaint reported on 20 December 2021 was not confined to the regulatory status of vaccines.

It comprised eight evidential modules addressing a broad range of alleged conduct.

The existence of a regulatory authorisation, whether temporary, conditional or otherwise, did not, without further analysis, determine whether criminal offences had or had not been committed across those broader allegations.

Accordingly, the regulatory status of vaccines formed one evidential consideration.

Whether it was capable of determining the entirety of CRN 6029679/21 is a separate question considered later in this bundle.

Questions Arising

- What precise regulatory status did each COVID-19 vaccine hold on 21 February 2022?
- Which authorisations were temporary, which were conditional and which, if any, were full marketing authorisations?
- Did the closure letter use the expression "*approved*" as a general descriptor rather than a technical legal term?
- If so, did that terminology accurately convey the regulatory position as it existed on 21 February 2022?
- Most importantly, even if the regulatory position was accurately described, what bearing did that fact have upon the remaining seven evidential modules comprising CRN 6029679/21?

Analysis of the Regulatory Reasoning

The closure letter proceeds to explain why the Metropolitan Police concluded that no criminal offences were apparent.

The principal reasoning advanced is that COVID-19 vaccines had been subject to recognised regulatory processes and that those processes demonstrated the allegations to be without foundation.

The relevant passages state:

"The relevant vaccines have been approved by the World Health Organization, the European Medicines Agency and the Medicines and Healthcare products Regulatory Agency..."

The letter then continues by referring to clinical trials, regulatory scrutiny, pharmacovigilance and systems for monitoring adverse events before concluding that no criminal offences were apparent and that there was insufficient evidence to pursue an investigation.

Proposition Advanced

The proposition appears to be that recognised regulatory approval processes and continuing safety monitoring demonstrated that there was no evidential basis upon which criminal offences could be established.

That proposition requires careful analysis.

Accuracy of the Regulatory Statements

As discussed previously in this paper, the regulatory position on 21 February 2022 was more nuanced than the single expression "*approved*" might suggest.

Nevertheless, vaccines had been lawfully authorised through recognised regulatory mechanisms operating within the United Kingdom and internationally.

Accordingly, the existence of regulatory authorisations is not, in itself, controversial.

The question is not whether those regulatory processes existed. The question, however, is what legal and evidential significance those regulatory processes carried in relation to the allegations reported under CRN 6029679/21.

Relevance to the Complaint

The complaint reported on 20 December 2021 did not allege simply that vaccines lacked regulatory authorisation. Nor was it confined to the proposition that vaccines should never have been deployed.

The complaint comprised eight evidential modules alleging a range of conduct extending beyond vaccine regulation.

Even if the regulatory processes described in the closure letter were accurately summarised, they addressed only one aspect of one module of the complaint.

The closure letter does not explain how the existence of regulatory authorisations determined allegations concerning:

- the origin of the pathogen;

- diagnostic testing;
- healthcare interventions;
- non-pharmaceutical interventions;
- psychological operations;
- suppression of alternative treatments; or
- regulatory action against dissent.

Nor does it explain how those regulatory processes answered the specific criminal allegations advanced by the complainants.

The Distinction Between Regulatory Approval and Criminal Liability

A further distinction ought to be recognised.

Regulatory authorisation and criminal liability are different legal concepts.

A regulatory authority determines whether a medicinal product satisfies the applicable statutory criteria for authorisation within its regulatory framework.

A criminal investigation considers whether there are reasonable grounds to suspect that identified individuals may have committed criminal offences and whether those allegations require investigation.

The existence of one does not automatically determine the other.

Accordingly, the existence of recognised regulatory authorisations could properly form part of an evidential assessment. However, the closure letter does not explain why those authorisations were

regarded as determinative of the criminal allegations reported in CRN 6029679/21.

Observations

This paper does not question the existence of regulatory authorisations. Nor does it seek to substitute an alternative scientific or regulatory assessment.

Its purpose is simply to examine the reasoning expressed within the closure letter.

That reasoning appears to proceed from the existence of recognised regulatory processes to the conclusion that no criminal offences were apparent.

The intervening analytical steps are not explained.

The letter does not identify how the regulatory material was evaluated against each alleged offence, nor how that reasoning extended to the remaining evidential modules comprising the complaint.

Questions Arising

The following questions arise from this aspect of the closure letter:

- What analytical process connected the regulatory status of COVID-19 vaccines with the conclusion that no criminal offences were apparent?

- Was the regulatory material considered in relation to each alleged offence individually?
- How did the regulatory reasoning address the seven non-vaccine modules comprising CRN 6029679/21?
- Did the decision-maker consider that regulatory authorisation was capable, without further enquiry, of determining allegations of Gross Negligence Manslaughter, Misconduct in Public Office and the other offences reported?
- If so, where is that reasoning recorded?

The Alleged Criminal Offences

Introduction

The closure letter concludes that:

"...there are no criminal offences apparent..."

and later states that:

"...there is insufficient evidence to pursue a criminal investigation..."

Those are significant conclusions.

However, before those conclusions can be evaluated, it is first necessary to identify the criminal allegations requiring determination.

The Complaint Reported

CRN 6029679/21 was not simply a complaint concerning public policy, scientific opinion or regulatory disagreement.

It was reported as a complaint alleging the commission of criminal offences.

Those allegations were advanced by the complainants by reference to evidential material supporting the eight modules summarised earlier.

The Metropolitan Police therefore required to consider whether the available material disclosed reasonable grounds to suspect the

commission of any criminal offence and, if so, whether further enquiry was required.

The Closure Letter

The closure letter ultimately states that:

"...there are no criminal offences apparent."

That conclusion is expressed in general terms.

However, the letter does not identify:

- which criminal offences were examined;
- the constituent legal elements of those offences;
- how those elements were analysed;
- what evidence was considered in relation to each offence;
- or how the conclusion was reached in respect of each allegation.

Instead, the reasoning proceeds principally through discussion of vaccine regulation, clinical trials and pharmacovigilance before expressing the conclusion that no criminal offences were apparent.

The Relationship Between Evidence and Offence

When allegations of criminal conduct are reported, two separate analytical exercises ordinarily arise.

- The first concerns the factual evidence.
- The second concerns the legal ingredients of the alleged offence.

Only by considering those two matters together can it properly be determined whether the available material is capable of satisfying the relevant legal test.

The closure letter does not identify that analytical process. It does not explain how the evidence submitted by the complainants was assessed against the legal elements of the offences reported. Nor does it explain why each offence was regarded as unsupported.

Individual Consideration

This observation is of particular importance because the complaint comprised eight evidential modules.

Those modules addressed different factual subject matter.

Consequently, they may also have engaged different legal considerations.

The closure letter, however, reaches a single global conclusion.

It does not distinguish between the separate allegations. Nor does it explain whether each module was individually considered before the overall decision was reached.

Sufficiency of Reasons

This paper is not concerned with whether the Metropolitan Police ultimately reached the correct conclusion. Instead, it examines whether the reasons given enable the reader to understand how that conclusion was reached.

The reasoning contained within the closure letter does not identify the legal analysis undertaken in respect of the offences alleged.

Accordingly, it is difficult to determine from the letter itself:

- which offences were examined;
- how those offences were analysed;
- whether different offences received different consideration; or
- whether the conclusion applied equally across every module of the complaint.

Questions Arising

The following questions arise:

- Which criminal offences were considered by the decision-maker?
- Was each alleged offence analysed separately?
- Was each of the eight evidential modules assessed independently?
- What legal test was applied when concluding that no criminal offences were apparent?
- How was the evidence submitted by the complainants evaluated against the constituent legal elements of each alleged offence?
- Is that analysis recorded elsewhere within the Metropolitan Police decision-making process?

Material Omissions Within the Closure Letter

Introduction

When assessing the adequacy of a decision document, it is necessary to consider not only the matters expressly addressed, but also whether material issues requiring determination have been omitted.

An omission does not necessarily demonstrate that a matter was not considered.

Equally, however, where a decision provides no reasons concerning a material issue, the reader is unable to determine from the decision itself whether that issue formed part of the decision-making process.

This section of the paper therefore identifies matters which appear absent from the closure letter when compared with the contemporaneous handling record reconstructed within Evidence Bundles Nos. 1 to 3.

The Seven Non-Vaccine Modules

The most immediately apparent omission concerns the scope of the complaint itself.

As identified earlier, CRN 6029679/21 comprised eight evidential modules.

The closure letter is directed almost exclusively towards vaccine regulation, vaccine safety and vaccine authorisation.

No separate consideration is given to the remaining seven modules.

The letter therefore provides no explanation enabling the reader to understand:

- whether those modules were examined;
- whether they were rejected;
- whether they were regarded as outside the scope of the complaint; or
- whether they were considered to be answered by the reasoning relating to vaccines.

The Submitted Evidence

The contemporaneous handling record demonstrates that substantial evidential material was submitted following the initial report.

The closure letter does not identify:

- the quantity of evidence reviewed;
- the categories of evidence examined;
- which submissions were accepted;
- which submissions were rejected;
- or the reasons why particular evidence was considered insufficient.

The reader is therefore informed of the conclusion but not the evidential route by which that conclusion was reached.

The Legal Analysis

The letter concludes that no criminal offences were apparent.

It does not however, identify:

- the offences considered;
- the legal ingredients of those offences;
- the analytical framework adopted; or
- how the evidence was assessed against the constituent elements of each alleged offence.

Without that analysis, the reasoning leading to the conclusion is not apparent from the letter itself.

The Investigative Process

The letter refers to an "*extensive review*'.

It does not explain:

- what that review comprised;
- who undertook it;
- whether specialist investigators were involved;
- whether legal advice was obtained;
- whether enquiries were undertaken;
- or how the review was conducted.

Evidence Bundles Nos. 1 and 3 identify a range of documented activity associated with CRN 6029679/21.

The closure letter does not explain the relationship between that activity and the review to which it refers.

The Decision-Making Process

The letter communicates a concluded position.

It does not explain:

- who reached that decision;
- whether it was reached by one individual or collectively;
- whether specialist advice informed the decision;
- whether external agencies were consulted;
- or whether differing views were considered during the review process.

This report does not suggest that such matters were absent from the decision-making process. It merely observes that they are not identified within the decision document itself.

The Basis Upon Which No Further Investigation Was Considered Necessary

The letter states that there was insufficient evidence to pursue a criminal investigation.

However, the reasoning explaining why no further investigative steps were considered capable of assisting is not set out.

The reader is therefore unable to determine from the letter:

- whether further enquiries were considered;

- what enquiries were rejected;
- why they were rejected; or
- whether any investigative options remained available at the point the decision was reached.

Observations

None of the matters identified above necessarily establish that they were overlooked during the Metropolitan Police's consideration of CRN 6029679/21.

The observation made in this section of the paper is more limited.

They are not addressed within the closure letter itself.

Accordingly, the letter provides only a partial explanation of the reasoning underlying the decision communicated on 21 February 2022.

Whether fuller reasoning exists elsewhere within the Metropolitan Police records is a matter capable of investigation.

Questions Arising

- Were all eight evidential modules considered individually?
- Where is the analysis of the seven non-vaccine modules recorded?
- What evidence was accepted, rejected or regarded as determinative?

- What legal analysis supported the conclusion that no criminal offences were apparent?
- What investigative options were considered before deciding that no further investigation was justified?
- Does further recorded reasoning exist beyond the closure letter itself?

Overall Assessment of the Closure Letter

Introduction

The purpose of this report has not been to determine whether the conclusions contained within the Metropolitan Police closure letter of 21 February 2022 were ultimately correct. Nor has it sought to substitute an alternative assessment of the allegations reported under CRN 6029679/21.

The purpose has been to examine the closure letter itself as the document communicating the Metropolitan Police's decision to close the report and to assess whether that document adequately explains the basis upon which that decision was reached.

The Scope of the Decision

The first issue identified within this report concerns the scope of the complaint requiring determination.

The contemporaneous record demonstrates that CRN 6029679/21 comprised eight distinct evidential modules.

The closure letter, however, is framed almost entirely by reference to allegations concerning COVID-19 vaccines.

Whether that reflects a deliberate narrowing of the issues under consideration, a summary of the complaint, or an assumption that the vaccine-related reasoning answered the complaint in its entirety is not explained within the letter.

The reader is therefore left unable to determine how the remaining seven evidential modules were addressed.

The Evidential Reasoning

The letter refers to an “*extensive review*” and reaches clear conclusions.

However, it provides only limited explanation of the evidential process by which those conclusions were reached.

The letter does not identify:

- the evidence regarded as determinative;
- the evidence considered but rejected;
- the reasoning applied to the principal allegations;
- or the analytical process by which the available material was assessed.

The conclusions are therefore apparent, but the reasoning leading to those conclusions is considerably less so.

The Legal Reasoning

The closure letter concludes that no criminal offences were apparent and that there was insufficient evidence to pursue a criminal investigation.

These are important legal conclusions. However, the letter does not explain:

- which offences were considered;

- how their constituent legal elements were analysed;
- how the evidence was evaluated against those elements; or
- why further enquiry was considered unnecessary.

Consequently, the legal route by which the conclusions were reached is not apparent from the decision document itself.

The Regulatory Reasoning

The report has also examined the reliance placed upon the regulatory status of COVID-19 vaccines.

Whether or not the regulatory position was accurately described, that reasoning principally addresses one component of one evidential module.

The closure letter does not explain how that regulatory material determined the broader allegations comprising CRN 6029679/21.

The Function of the Closure Letter

A closure letter performs an important constitutional function - It informs complainants why a public authority has reached a particular decision.

It also enables that reasoning to be understood, scrutinised and where appropriate, challenged.

The issue examined within this report is therefore not whether every conclusion expressed within the letter was necessarily incorrect. It

is whether the reasoning contained within the letter sufficiently explains the decision communicated.

That is a separate question.

Final Observations

This report has identified a number of questions arising from the wording of the closure letter.

Those questions concern:

- the scope of the complaint considered;
- the evidential basis of the reasoning adopted;
- the legal analysis undertaken;
- the relationship between regulatory material and criminal allegations;
- and the adequacy of the reasons provided for closing CRN 6029679/21.

The report does not attempt to answer those questions conclusively. It instead identifies them as matters which may merit further examination in light of the documentary record which is now available and indeed, continues to expand.

Conclusion

The closure letter dated 21 February 2022 represented the formal conclusion of Metropolitan Police handling of CRN 6029679/21.

It therefore occupies a central position within the documentary history reconstructed throughout this four-part evidential submission.

- **Evidence Bundle No. 1** reconstructed the chronology of the report.
- **Evidence Bundle No. 2** examined the wider operational and constitutional context.
- **Evidence Bundle No. 3** considered the legal framework governing criminal investigation, disclosure and public-law decision-making.
- **This final bundle** has examined the decision document itself.

Taken together, the four bundles do not seek to determine criminal liability, nor do they seek to invite predetermined conclusions regarding the conduct of any individual or institution.

Their purpose is to assist the present investigation by reconstructing the contemporaneous documentary record, identifying the legal framework within which decisions were made and examining whether the reasons communicated on 21 February 2022 adequately explain the decision to close CRN 6029679/21.

If further examination of that decision is now undertaken, it can do so upon a documentary foundation which is broader and more complete than that available at the time the closure letter was written.

Matters Capable of Verification

The questions identified throughout this report are, in large measure, capable of objective verification by reference to Metropolitan Police records, including decision logs, review records, supervisory records, legal advice, crime-recording documentation, internal correspondence and other contemporaneous material retained in connection with CRN 6029679/21.

Where this report identifies an apparent omission or unresolved question, it does so recognising that additional documentary material may exist within Metropolitan Police records which was not available to the author at the time of writing.

A Final Word

The purpose of my four-part submission to the Metropolitan Police has not been to prove that the wrong decision was reached.

Its purpose has been to ensure that any further consideration of CRN 6029679/21 proceeds upon the fullest available documentary record.

Whether the decision of 21 February 2022 remains sustainable in light of that record is a matter for the present investigation to determine.

Ian Clayton

24 July 2026