

WHERE IS THE EVIDENCE OF MEANINGFUL INVESTIGATIVE ENGAGEMENT?

An Evidential Examination of CRN 6029679/21 Against Policing's Own Standard of Criminal Investigation

1. The question this paper asks

This paper does not proceed upon the premise that there was no police investigation or investigative activity concerning CRN 6029679/21.

The evidence now assembled makes such a proposition incredibly unsafe.

There was plainly substantial police activity.

Material was received. Officers were engaged. A Detective Sergeant was described as overseeing the crime report. An “*officer in the case*” was said to be processing a large quantity of information. Legal advice was considered necessary. The allegations were assessed. The Metropolitan Police subsequently acknowledged that they had been “*reviewed/investigated to determine whether a crime should be recorded*” and, significantly, in September 2026, PC Amanda Cousins, of the Metropolitan Police Professional

Standards office, confirmed explicitly, following her recent investigation into the handling of CRN 6029679/21, that an investigation had taken place.

At national level, CRN 6029679/21 became the subject of consideration within the Operation Talla structure. A “*final assessment*” was anticipated. A “*peer review assessment*” existed or was anticipated. The Operation Talla team was tasked to share its result with all chiefs.

There was, therefore, activity.

The question is a different one:

Where is the evidence of meaningful investigative engagement with the allegations and with the substantial body of evidence submitted in support of them?

That question has now acquired particular force because the National Police Chiefs' Council itself, through former ACC Owen Weatherill, has formally explained what a criminal investigation is supposed to involve.

The investigation can therefore be tested not against a standard invented by critics of policing, but against policing's own stated standard.

2. Owen Weatherill supplies the benchmark

In his corporate witness statement on behalf of the NPCC to the UK Covid-19 Inquiry, former ACC Owen Weatherill addressed the “*General role of policing in investigating crime*”.

His explanation is important.

In substance, Weatherill describes a criminal investigation as commencing where an allegation considered to require further enquiry is pursued for the purpose of identifying suspects and determining whether they should be charged and brought to justice.

Critically, he goes on to state that an investigator should pursue:

“all reasonable lines of inquiry, whether these point towards or away from the suspect.”

That proposition reflects the established CPIA framework.

The College of Policing's Authorised Professional Practice likewise states that the primary purpose of a criminal investigation is to identify the suspect and ensure that they are brought to justice following a “*professional, ethical and robust investigation*”. It requires investigators impartially to pursue reasonable lines of enquiry pointing both towards and away from a suspect.

The College's guidance is more specific still. Investigators should develop an investigation plan, identify and gather available material, examine and collate it, test hypotheses, identify further reasonable lines of enquiry and continually evaluate and re-evaluate the material gathered. Material pointing away from a suspect matters just as much as material pointing towards one.

That provides an objective benchmark.

- An investigation is not demonstrated merely because documents were received.
- It is not demonstrated merely because documents were read.
- It is not demonstrated merely because senior officers discussed them.
- Nor is substantive investigation necessarily demonstrated by legal consultation, assessment, peer review or an ultimate decision.

The investigative question is:

What reasonable lines of enquiry arose from the evidence and what was done about them?

3. That distinction is fundamental to CRN 6029679/21

The evidence now available requires three propositions to be kept separate.

- First, CRN 6029679/21 plainly received substantial police and institutional attention.
- Second, the documentary record supports the existence of investigative activity.
- Third, neither proposition answers whether there was meaningful, impartial and evidence-led investigative engagement with the substantive allegations.

It is the third proposition with which this paper is concerned.

Indeed, the existence of considerable institutional activity makes the question more important rather than less.

If significant police resources were devoted to CRN 6029679/21, the records should reveal what those resources were used to establish.

4. The volume of evidence was known contemporaneously

On 25 January 2022, Philip Hyland wrote directly to Metropolitan Police Commissioner Cressida Dick concerning CRN 6029679/21.

His letter expressly stated that the matter was:

“still being assessed or investigated, as the case may be”

and recorded that four officers were reportedly assigned to it but were struggling with the scope and volume of evidence.

Hyland specifically recorded that:

“A substantial number of witness statements, expert and victims, have been uploaded or been handed in.”

That is important.

Whatever conclusion was ultimately reached concerning the merits of those statements, their existence and volume were being expressly drawn to the attention of the Commissioner while the matter remained under assessment.

The evidence presently assembled therefore does not concern an allegation supported merely by a letter or a handful of assertions.

There was a substantial evidential submission.

5. There were active attempts to engage investigators with further evidence

The 25 January letter goes further.

Hyland expressly sought an appointment with the officers for the purpose of presenting further evidence.

He complained:

“To date we have not received any response from an email requesting an appointment.”

The letter then requested that sufficient officers be assigned:

“in order to assimilate and evaluate the volume of evidence being presented.”

Potential evidential sources were also identified. The letter stated that Robert F Kennedy Jr was willing to testify and referred to the continuing availability of Brook Jackson, whose concerns had previously been reported by the British Medical Journal.

The significance of this material should be stated carefully.

It does not establish that those witnesses would necessarily have provided admissible or probative evidence and it does not establish that every proposed witness was a reasonable line of enquiry. It does, however, establish something much simpler:

Those supporting the crime report were actively attempting to engage police investigators with further evidence and potential evidential sources.

That leads directly to Weatherill's test.

- Were those proposed lines of enquiry reasonable?
- If they were, were they pursued?
- If they were not, where is the recorded investigative rationale explaining why?

6. The February 2022 complaint evidence corroborates the existence of investigative activity

Philip Hyland complained to the MPS on 7 February 2022.

The subsequently issued complaint report records that the complaint handler had read CRN 6029679/21 and contacted the Detective Sergeant overseeing the crime report.

The Detective Sergeant reportedly explained that there was:

“a lot of information for the officer in the case to process”

and that:

“the context of the crime report is fairly complex where legal advice is required.”

The complaint material further referred to *“necessary steps”* being taken before a meaningful update would be provided.

Again, this does not describe inactivity. It describes activity.

- There was an officer in the case.
- There was a supervising Detective Sergeant.

- There was a substantial quantity of information.
- There was complexity.
- There was a perceived requirement for legal advice.
- There were apparently further “*necessary steps*”.

That evidence is important because it prevents an artificially binary analysis in which either a formal investigation existed or nothing happened.

Something plainly was happening.

The proper forensic question is:

What were those “necessary steps”, and did they include meaningful investigative engagement with the evidence?

7. Tor Garnett's formulation becomes pivotal

Detective Superintendent Tor Garnett subsequently supplied perhaps the clearest MPS description of what occurred.

She accepted that describing the allegations as under investigation:

“would not have been an inaccurate representation”

because:

“the allegations were, in fact, being reviewed/investigated to determine whether a crime should be recorded.”

That admission should be taken at face value.

There was a process capable, in the Metropolitan Police's own terminology, of being described as *“reviewed/investigated”*.

Garnett's formulation also reveals its apparent objective:

To determine whether a crime should be recorded.

That is where the distinction becomes critical.

Compare that formulation with Weatherill's later NPCC explanation.

Weatherill describes criminal investigation in terms of further enquiry, identification of suspects, determination of whether they should be charged and the pursuit of reasonable lines of enquiry towards and away from them.

Garnett describes the activity concerning CRN 6029679/21 as being undertaken to determine whether a crime should be recorded.

Those descriptions are not necessarily inconsistent.

A preliminary evidential assessment may properly precede crime recording in appropriate circumstances.

Neither are they synonymous and that creates the central question:

Was the investigative activity principally directed towards testing the substantive allegations, or principally towards determining whether those allegations would be permitted to cross the threshold into the ordinary crime-recording and investigative process?

8. What would meaningful investigative engagement look like?

Policing's own professional guidance assists.

The College of Policing states that investigators should identify and gather material, examine it, develop an investigation plan, test hypotheses, continually reassess the material and identify further reasonable and relevant lines of enquiry. Decisions and their rationale should be recorded.

Its guidance on professional curiosity emphasises open-mindedness, asking questions, looking beyond matters at face value and challenging one's own assumptions.

Accordingly, in the particular circumstances of CRN 6029679/21, one would reasonably look for records answering questions such as:

- Which witnesses were identified?
- Which were contacted or interviewed?

- Which witness statements were assessed, by whom and against what evidential criteria?
- Which expert propositions were tested?
- Were independent experts consulted?
- Which documentary allegations were corroborated or disproved?
- Which records were obtained independently from the complainants?
- Which suspects, if any, were identified?
- Which reasonable lines of enquiry were generated?
- Which were pursued?
- Which were rejected?
- What hypotheses were formulated?
- What material was gathered pointing towards the allegations?
- What material was gathered pointing away from them?
- Where are the recorded rationales for those decisions?

These questions do not presuppose that the allegations were true.

Quite the opposite.

They are the means by which an investigator determines whether allegations are true, false, evidentially insufficient or incapable of proof.

9. The 12 January 2022 national record changes the picture

The matter becomes still more significant when the national policing evidence is introduced.

On 12 January 2022, the Metropolitan Police crime report was expressly discussed within the Operation Talla national structure.

The contemporaneous minutes record, in substance, that most forces had received material concerning vaccine allegations, that a crime report had been made to the Metropolitan Police and that the final assessment was expected shortly, following which a clearer steer could be communicated.

The recorded action was:

“Op Talla team to share the results of the peer review assessment relating to the Crime Report submitted to the Met Police in relation to Anti Vaccinations with all chiefs.”

That is primary contemporaneous evidence of considerable importance.

It establishes that the Metropolitan Police crime report had acquired national significance.

It identifies a peer review assessment.

It identifies the Operation Talla team.

And it records that the result was to be shared with all chiefs.

The question consequently broadens.

What did the peer review actually review?

- Was it an evidential examination of the allegations?
- Did it examine the witness statements?
- Did it consider the expert material?
- Did it identify reasonable lines of enquiry?
- Did it recommend that any be pursued?
- Did it test competing hypotheses?
- Or was the peer review principally concerned with whether the report should be recorded and what national steer should thereafter be given to other forces?

Those questions should be answerable from the peer-review records.

10. Six days later: “*NO investigation has been initiated*”

On 18 January 2022, Operation Talla Silver Owen Weatherill communicated nationally to Chief Constables and Force Duty Gold Officers.

That communication referred to the review process but stated:

“NO investigation has been initiated.”

That language must now be considered alongside three other pieces of evidence.

- First, Hyland contemporaneously described the matter as being assessed or investigated.
- Second, the MPS complaint material records an officer in the case, a supervising Detective Sergeant, considerable information being processed, legal advice and further necessary steps.
- Third, Garnett subsequently accepted that describing the matter as under investigation would not have been inaccurate because the allegations were being *“reviewed/investigated”*.

The proper conclusion is not simply that one description must be true and the others false.

The more important possibility is that different institutional actors were using *“investigation”* to describe different stages or forms of activity.

That makes precision essential.

If Weatherill meant that no formally constituted criminal investigation had commenced, what precisely was the

“reviewed/investigated” activity which Garnett later acknowledged?

And, critically:

Did that antecedent activity nevertheless engage with reasonable lines of enquiry in the manner which Weatherill himself later identified as characteristic of criminal investigation?

11. Then comes the evidence of rejection

The evidential balance becomes increasingly difficult when the wider Operation Talla material is considered.

The Police Scotland Speirs Directive referred expressly to the Metropolitan Police complaint and to the MPS review.

It then directed that reports or requests within the identified category:

“should be rejected.”

It further directed that:

“Operation Talla should be informed via a CVI entry.”

The significance is not that ACC Alan Speirs made any decision concerning CRN 6029679/21. On the evidence presently available, he did not.

The significance is contextual.

The directive provides primary evidence of the approach operating within one constituent part of the wider UK policing response.

And the subsequently obtained Police Scotland video appears to show rejection operating in practice at the point of reception.

The question raised is of course, obvious:

How does an instruction to reject a category of reports interact with the investigative obligation to consider the individual evidence and pursue reasonable lines of enquiry?

12. “Guidance to not record”

The 14 February 2022 material is more stark still.

It records:

“it would appear that the guidance to not record has been a success as only one additional report has been created.”

That sentence requires disciplined interpretation.

- The precise underlying guidance should be produced.
- Its authorisation should be established.

- Its scope should be identified.
- Its relationship to CRN 6029679/21 should be evidenced rather than assumed.

Its ordinary meaning does, however, remain important.

The result being measured was non-recording. The small number of additional reports created was cited as evidence that the guidance had been a “*success*”.

That produces a powerful evidential comparison.

There is identifiable documentary evidence of:

- rejection;
- non-recording;
- national coordination;
- intelligence routing;
- national steering;
- and the measurement of the apparent success of non-recording.

Against that documentary record, where is the equivalent body of records demonstrating that the evidence submitted under CRN 6029679/21 was interrogated through reasonable investigative lines of enquiry?

That is not an accusation. It is an evidential question.

13. The imbalance is an issue

Our own investigation has already assembled considerable evidence of institutional activity.

That evidence should not be understated merely because it complicates earlier MPS descriptions of what occurred, but what is striking is where the documentary activity appears concentrated.

- We can identify records concerning assessment.
- We can identify peer review.
- We can identify national discussion.
- We can identify anticipated national steering.
- We can identify legal involvement.
- We can identify rejection.
- We can identify non-recording.
- We can identify intelligence handling.
- We can identify closure.
- We can identify subsequent institutional explanations and complaint determinations.

What remains considerably harder to identify in comparable documentary abundance is evidence of the ordinary investigative acts described by policing's own standards.

- Where are the witnesses interviewed?
- Where are the reasonable lines of enquiry?

- Where is the testing of competing hypotheses?
- Where is the independent gathering of evidence?
- Where is the examination of material pointing towards and away from identified suspects?
- Where are the recorded decisions explaining why apparently available lines of enquiry were unnecessary or disproportionate?

That is the evidential imbalance.

14. Subsequent complaints should have resolved this

There is a further difficulty.

The original handling of CRN 6029679/21 did not disappear into history.

It has subsequently been subjected to complaints, correspondence, Freedom of Information requests, Subject Access Requests, Judicial Review proceedings and further police and oversight consideration.

One might therefore reasonably expect the central factual question to have become clearer with time.

Instead, later disclosures have repeatedly complicated earlier institutional accounts.

The concern is not that every unanswered letter establishes misconduct. It plainly does not. Nor does every delayed or inadequate complaint response establish institutional obstruction.

The concern arises from the cumulative pattern.

Questions concerning what investigative activity occurred, who authorised it, what evidence was tested, how national policing became involved, what the peer review contained, and what relationship existed between the individual MPS decision and the wider national approach have repeatedly survived processes which might reasonably have been expected to answer them.

The result is striking.

There appears to be greater documentary clarity concerning how these reports were to be contained, rejected or not recorded than concerning how the substantive evidence supporting CRN 6029679/21 was actually investigated.

15. Ethical investigation is not a rhetorical concept

This paper deliberately uses the expression meaningful investigative engagement.

That is not intended to create some novel legal test.

It describes characteristics already embedded within policing's own standards.

The College of Policing describes investigation as professional, ethical and robust. Investigators must be impartial, open-minded and professionally curious; pursue reasonable lines of enquiry towards and away from suspects; gather and examine material; test hypotheses; and record their decisions.

Ethical investigation therefore does not mean reaching the conclusion desired by a complainant. It means permitting the evidence to determine the conclusion.

- A proper investigation might have concluded that the allegations were unfounded.
- It might have concluded that no criminal offence was disclosed.
- It might have found evidential deficiencies incapable of remedy.
- It might have identified reasonable lines of enquiry which ultimately disproved the allegations.

Any of those could represent a legitimate investigative outcome, but there is a fundamental distinction between: investigating evidence and concluding that it does not establish criminality

and:

preventing allegations from progressing into the investigative process without meaningfully testing the evidence capable of establishing whether criminality occurred.

It is that distinction which the records must now resolve.

16. The records capable of answering the question

No speculation is required.

If meaningful investigative engagement occurred, the evidential footprint should exist.

Produce or identify:

- the investigation strategy;
- the investigation management records;
- the decision logs;
- the identities and functions of the officers assessing the evidence;
- the schedules showing which witness statements and evidential submissions were examined;
- the witness-contact records;
- the interview records;
- the reasonable-lines-of-enquiry records;

- the records showing which proposed enquiries were rejected and why;
- the expert assessments;
- the independent material gathered by investigators;
- the hypotheses considered and tested;
- the records of material pointing towards suspects;
- the records of material pointing away from suspects;
- the instructions seeking legal advice;
- the peer-review assessment;
- the material supplied to those conducting that peer review;
- the conclusions of that review;
- and the documented evidential reasoning leading ultimately to the decision not to record crime.

That is not at all an extravagant demand. It is substantially the documentary architecture one would expect from policing's own description of proper investigation.

The College's current APP expressly emphasises recording investigative decisions and rationale, both for case management and so that the quality of an investigation can subsequently be scrutinised.

If those records exist, they may answer this paper. If they do not, that absence requires explanation.

17. The Weatherill test

The issue can now be reduced still further.

Owen Weatherill was not an external critic of Operation Talla. He was Operation Talla Silver and in formal evidence given on behalf of the NPCC he has articulated the principle against which this investigation can fairly be tested:

“all reasonable lines of inquiry”

must be pursued, whether they point towards or away from the suspect.

So, apply that standard.

What were the reasonable lines of enquiry arising from the material submitted under CRN 6029679/21?

- Which were identified?
- Which were pursued?
- Which pointed towards the allegations?
- Which pointed away from them?
- Which witnesses were approached?
- Which expert propositions were tested?
- Which independent evidence was obtained?
- Which lines were considered unreasonable or disproportionate?

- Who made those decisions?
- And where are they recorded?

These are now the questions.

18. Conclusion: Show the investigation of the evidence

The evidence presently assembled does not support the simplistic proposition that nothing happened.

Quite the contrary.

A great deal certainly happened.

That is precisely why this issue has become so important.

- CRN 6029679/21 attracted officers, supervisors, legal consideration, peer review, senior police attention, Operation Talla involvement and national interest.
- Its anticipated assessment was sufficiently important that its result was to be shared with all chiefs.
- The wider policing response generated instructions concerning rejection.
- It generated intelligence-routing arrangements.
- It generated “*guidance to not record*”.
- And it generated an internal assessment that the guidance had been “*a success*”.

The institutional machinery is visible. What remains markedly less visible, however, is the evidential footprint demonstrating that the substantial allegations themselves were subjected to the kind of impartial, professionally curious, evidence-led investigation which policing says an investigation requires.

That distinction is now critical.

The question is not:

Was there police activity?

There plainly was.

Nor should the question simply be:

Was there an investigation?

The documentary record contains evidence capable of supporting the existence of investigative activity and the Metropolitan Police itself subsequently acknowledged that the allegations were “*reviewed/investigated*”.

The proper question is:

Was there meaningful investigative engagement with the evidence?

And Weatherill's own NPCC evidence tells us how that question can be answered.

- Show the reasonable lines of enquiry.

- Show which were pursued.
- Show the witnesses who were engaged.
- Show the evidence which was tested.
- Show the competing hypotheses.
- Show the material gathered towards and away from suspects.
- Show the decisions.
- Show the reasons.
- Show the peer review.
- Show the investigative audit trail.

There is now a substantial documentary record demonstrating what policing did around CRN 6029679/21.

What the public is entitled to understand is what policing did with the evidence inside it.

Until that evidential account is produced, the imbalance remains stark:

- Substantial evidence of institutional engagement with the crime report;
- substantial evidence of national engagement with how such reports should be handled;
- but presently far less identifiable evidence of meaningful investigative engagement with the allegations those reports were asking police to investigate.

And perhaps the most important point is the simplest.

The standard against which that question is now being asked is not ours.

It is policing's own.

Final observation

In her report dated 16 September 2026, PC Amanda Cousins was clear in her finding, when she stated:

“I have reviewed crime report 6029679/21 and can confirm that an investigation was opened in relation to the matter recorded.”

Ian Clayton

23 September 2026