

# Criminal Allegations Report

## Submission of Preliminary Evidence Pack (Edition 1 - August 2025)

Date: As per cover email

For the Attention of:  
The Chief Constable

Subject: Submission of Evidence Pack – Allegations of Criminal Conduct Relating to COVID-19 Vaccine Programme and Associated Investigative Suppression

**Crime Reference(s): CRN 6029679/21 (Metropolitan Police Service) and Related Matters**

Dear Chief Constable,  
*(For the attention of all UK Police Chief Constables)*

I am formally submitting the enclosed Evidence Pack for your urgent consideration and action. This material contains *prima facie* evidence of serious indictable offences and associated misconduct in public office, arising from the COVID-19 vaccine rollout, and from the alleged suppression or obstruction of related criminal investigations under Operation Talla and/or similar protocols/policing procedure.

The enclosed documentation is provided in good faith to assist

your force in meeting its statutory obligations under the Criminal Procedure and Investigations Act 1996 (CPIA), the associated Code of Practice, and the Victims' Code.

## **Summary of Material Contained in the Evidence Pack**

### **1. Overview of Allegations**

- Misconduct in public office, perverting the course of justice, and breaches of statutory duties under CPIA 1996.
- Failure to investigate credible reports of criminal harm linked to the COVID-19 vaccine programme.
- Operation Talla-style directives instructing forces not to record or progress such complaints.

### **2. Key Exhibits**

- Extracts from official statements, FOI disclosures, and recorded police interactions evidencing the refusal to investigate.
- Summary of the Judicial Review decision by Judge Pool, highlighting its flaw in failing to address CPIA applicability.
- Relevant case law excerpts on CPIA triggers and investigative obligations.
- Witness evidence of CRN 6029679/21 being opened by the Metropolitan Police, with confirmation from PC Hawkey that evidence remains in MPS possession.
- Corroborative material showing new evidence since 2021/2022, capable of being supported by updated expert witness statements.
- Testimony from Dominic Cummings (2021) indicating disregard for lawful process in pandemic decision-

making, reported to Durham Constabulary and met with a non-action response consistent with Operation Talla patterns of policing.

### 3. Supporting Context

- Summary of the 19 March 2020 downgrading of COVID-19 from High Consequence Infectious Disease status, and its non-disclosure in mainstream reporting.
- Overview of the scope and harm of the alleged criminal conduct, with reference to international and domestic expert opinion.

### Statutory Engagement of CPIA Duties

Under Section 23(1) CPIA 1996, the threshold for a criminal investigation is clearly met by:

- The nature of the allegations (serious indictable offences).
- The volume and credibility of evidence already gathered.
- The fact that the Metropolitan Police Service previously recorded and retained material under CRN 6029679/21.

Accordingly, your force is under a legal obligation to:

- Pursue all reasonable lines of inquiry without delay (Code of Practice 3.4).
- Secure and retain relevant material (Code 5.1–5.4).
- Ensure proper disclosure to the CPS where applicable.

### Action Requested

I request that your force:

1. Formally record and allocate this matter for criminal investigation.

2. Secure all evidence in the pack, and request copies from MPS under CRN 6029679/21 to prevent loss or destruction.
3. Acknowledge in writing that CPIA duties are engaged and confirm compliance measures.
4. Provide a timetable for investigative progress and a named senior officer for oversight.

This submission and its attachments are confidential and provided solely for policing and prosecutorial purposes. Any failure to act on this evidence may itself constitute further misconduct in public office and will be referred to the Independent Office for Police Conduct, Members of Parliament, and other oversight bodies as appropriate.

I look forward to your acknowledgment of receipt and confirmation of the immediate steps your force will take.

## Introductory Note

This evidence pack builds directly upon the extensive evidential submission made to the Metropolitan Police Service in December 2021 under Crime Reference Number 6029679/21, which alleged serious indictable offences arising from the manufacture, promotion, and administration of the COVID-19 vaccines. That original report was supported by approximately 400 witness and expert statements, detailed scientific analyses, and multiple documentary exhibits - proof of which is retained by the MPS, as confirmed in 2025 by PC Hawkey of the MPS Directorate of Professional Standards – ***Link to a copy of PC Hawkey's email of 12<sup>th</sup> August 2025 – [https://ethicalapproach.co.uk/PC\\_Hawkey\\_email\\_12082025.pdf](https://ethicalapproach.co.uk/PC_Hawkey_email_12082025.pdf)***

This updated pack goes further. It contains significant new and corroborative evidence which not only strengthens the original allegations, but also demonstrates, on the balance of probabilities and supported by documentary proof, that the statutory investigative process required under the Criminal Procedure and Investigations Act 1996 was unlawfully suppressed.

This suppression is evidenced in part by:

- The Alan Speirs directive instructing rejection of public reports relating to COVID-19 vaccine harms - ***Link to the FOI***

***result , including details of the directive issued by ACC Alan Speirs –***

**[https://ethicalapproach.co.uk/police scotland FOI response 20.03.2025.pdf](https://ethicalapproach.co.uk/police_scotland_FOI_response_20.03.2025.pdf)**

- New scientific and pharmacovigilance material, including the Perseus MHRA Report [*Link - [https://perseus.org.uk/wp-content/uploads/2023/04/Perseus\\_MHRA\\_Main-Report-1-1.pdf](https://perseus.org.uk/wp-content/uploads/2023/04/Perseus_MHRA_Main-Report-1-1.pdf)*]

which directly corroborates and expands upon the original expert submissions in CRN 6029679/21.

In an incidental respect;

it is also of note that in February 2022, a Case Briefing Document and Lab Report, which is self-explanatory was sent to all Chief Constables of UK police forces. No response from any police force, to date (as of 14<sup>th</sup> August 2025) has ever been received. The said Case Briefing Document and Lab Report is available at –

[https://ethicalapproach.co.uk/case briefing and lab report.pdf](https://ethicalapproach.co.uk/case_briefing_and_lab_report.pdf)

On the balance of probabilities, the suppression, whether by act or omission, appears to constitute misconduct in public office, perverting the course of justice and breaches of statutory CPIA obligations.

The enclosed material is presented in a format compliant with

CPIA requirements, enabling immediate investigative action. Continued inaction in light of this updated evidence will place the receiving force at direct risk of being complicit in the alleged offences and in any subsequent finding of institutional or individual culpability.

## **Police Submission Brief**

### **Allegations:**

- Serious criminal offences relating to COVID-19 vaccine administration and harms.
- Misfeasance, malfeasance, and/or nonfeasance in public office by police officers.
- Suppression of legitimate public crime reports contrary to statutory duties.

### **CPIA Triggers:**

- Engagement of Criminal Procedure and Investigations Act 1996 (CPIA) upon receipt of allegations.
- Duties under CPIA Code of Practice sections 3.4, 5.1–5.4 engaged.
- Failure to pursue reasonable lines of inquiry without delay.

### **Specific Requests:**

1. Immediate acknowledgement of this report and allocation of a named investigating officer.
2. Written confirmation that all evidence will be preserved.
3. Confirmation of investigative steps and timeline.
4. Senior officer oversight assigned.
5. Confirmation that CPIA duties are recognised and applied.

## Timeline Summary Chart

No.	Date	Event	Evidence Pack Cross-Reference
1	19 Mar 2020	UK Government downgrades COVID-19 from High Consequence Infectious Disease (HCID) status, despite Coronavirus Act measures continuing.	(HCID Downgrade Summary)
2	Dec 2021	CRN 6029679/21 reported to Metropolitan Police Service (MPS) by Mark Sexton and others, alleging serious indictable offences relating to COVID-19 vaccines. ~400 witness and expert statements submitted.	(CRN 6029679/21 Submission Summary)
3	25 Jan 2022	NPCC / Operation Talla directive issued (ACC Alan Speirs) instructing all UK police forces not to accept or progress public reports relating to COVID-19 vaccine harms.	(Speirs Directive FOI Disclosure)

<b>4</b>	Feb 2022	Case briefing and laboratory report sent to all UK Chief Constables by Ian Clayton (named contact for police liaison). No force made contact.	(Case Briefing & Lab Report) <a href="https://ethicalapproach.co.uk/case%20briefing%20and%20lab%20report.pdf">https://ethicalapproach.co.uk/case briefing and lab report.pdf</a>
<b>5</b>	Mar 2022	Metropolitan Police declare to public that no investigation has taken place into CRN 6029679/21, contradicting retained evidence and internal communication s.	(MPS “No Investigation” Statement + Contradictory Evidence)
<b>6</b>	2022 – 2024	Durham Constabulary receives related allegations referencing Dominic Cummings’ testimony on “ignoring rules” and “lawyers getting in the way” but refuses to act.	(Durham Constabulary Correspondence)
<b>7</b>	2023	Additional scientific and medical evidence emerges, corroborating the original CRN 6029679/21 submissions.	(Updated Expert Evidence Summaries)

<b>8</b>	2022	Public engagement with Hampshire Police senior officer regarding alleged COVID-19 vaccine-related matters	Hampshire Police Engagement Video <a href="https://youtu.be/TBjWQ-A2Ams?si=3UB081vl63Bc2ZGn">https://youtu.be/TBjWQ-A2Ams?si=3UB081vl63Bc2ZGn</a>
<b>9</b>	11 Aug 2025	Hampshire Police engagement; further evidence presented; national position confirmed; CRN 44250361222 issued.	(Hampshire Police Contact Record)

## **COVID-19 HCID Downgrade – 19 March 2020**

Purpose: To establish that COVID-19 was officially downgraded from “High Consequence Infectious Disease” (HCID) status prior to the introduction and enforcement of emergency measures under the Coronavirus Act 2020, raising potential questions of misrepresentation, misuse of powers, and public deception.

***Link to explain how Government define HCID -***

**<https://www.gov.uk/guidance/high-consequence-infectious-diseases-hcid>**

### **1. Official Classification and Downgrade**

January 2020 – The Four Nations Public Health HCID Group issued an interim classification of COVID-19 as a High Consequence Infectious Disease.

HCID criteria:

- High case-fatality rate.
- No effective prophylaxis or treatment.
- Difficult to detect rapidly.
- High transmission potential in community and healthcare settings.
- Requires enhanced individual, population, and system-level responses.

19 March 2020 – The UK Government announced:  
“As of 19 March 2020, COVID-19 is no longer considered to be a high consequence infectious disease.”

- The Advisory Committee on Dangerous Pathogens agreed with this decision.
- Basis: Data showing low overall mortality rates and improved understanding of the disease.

***Link providing official confirmation of the downgrade -***  
***<https://questions-statements.parliament.uk/written-questions/detail/2020-09-28/95975>***

## 2. Timeline Discrepancy

Date	Event	Notes of Concern
Jan 2020	COVID-19 classified as HCID (interim)	Initial precautionary designation.
19 Mar 2020	COVID-19 officially downgraded from HCID	Criteria for HCID no longer met; expert committee concurred.
25 Mar 2020	Coronavirus Act 2020 passed	Emergency powers granted to police, based on public understanding of a 'high-consequence' threat.
Post-March 2020	Police powers exercised under Coronavirus Act	Public/media largely unaware of downgrade; enforcement continued as if HCID status applied.

## 3. Policing & Investigative Relevance

Prima facie evidence of a material fact (HCID downgrade) being omitted from reasonable public awareness at the point emergency legislation was enacted and police enforcement commenced.

If government actors knew the downgrade had occurred but permitted or encouraged enforcement as if HCID status still applied, this may satisfy elements of:

- Fraud Act 2006, s.2 (False Representation)
- Fraud Act 2006, s.3 (Failure to Disclose Information)
- Misconduct in Public Office

#### **4. CPIA and Case Handling**

Any investigation into alleged misconduct in public office or misuse of emergency powers post-March 2020 must include the HCID downgrade decision as a key evidential fact.

Omission of this material fact in prior judicial or policing decisions could represent:

- Failure to pursue reasonable lines of inquiry (CPIA Code of Practice 3.4)
- Failure to retain and disclose material capable of undermining prosecution or supporting the defence (CPIA 1996, s.3)

## Recommendation to Investigators

- Obtain the original 19 March 2020 Government HCID announcement from official records.
- Identify all police enforcement actions under the Coronavirus Act 2020 taken after this date.
- Examine whether operational guidance to police post-19 March 2020 made reference to the downgrade.

## **Evidence Reference Brief – CRN 6029679/21**

This brief sets out the relevance of the Metropolitan Police Service's (MPS) retained evidence under CRN 6029679/21 to current allegations being reported to your force.

### **1. Existing Evidential Core**

The CRN 6029679/21 file already contains extensive evidential material submitted to the Metropolitan Police Service in Dec 2021–Feb 2022, including hundreds of witness statements, expert reports, and documentary exhibits. This evidence is directly relevant to the offences now being reported to your force.

### **2. Confirmation of Retention by MPS**

PC Hawkey (MPS Professional Standards) has confirmed in recent correspondence that the MPS still holds this evidential material. This means the file is available for disclosure or inter-force transfer under CPIA 1996 obligations.

*Link to PC Hawkey's email –*

<https://ethicalapproach.co.uk/PC Hawkey email 12082025.pdf>

### **3. CPIA Trigger and Suppression**

By accepting and retaining such evidence, MPS triggered CPIA statutory duties. Any claim that “no investigation took place” is contradicted by the existence of retained evidence. This raises concerns of CPIA breach, misfeasance, and/or perverting the course of justice.

## **4. Expanded and Corroborating Evidence Since 2022**

Since the original submission, further material has been obtained that strengthens and corroborates the evidence already held under CRN 6029679/21. Updated expert witness statements, reflecting the latest scientific, statistical, and medical data, can be arranged for submission to your force to supplement the existing file.

## **5. Recommended Action for Receiving Force**

- Obtain the CRN 6029679/21 file from the Metropolitan Police Service (Specialist Crime Command) via inter-force request.
- Liaise with complainants for provision of updated expert witness reports.
- Treat the matter as a live investigation in compliance with CPIA 1996 and the Victims' Code.

## **Updated Scientific and Medical Evidence**

This section summarises the new scientific and medical evidence that has emerged since the original submission to the Metropolitan Police Service under CRN 6029679/21. The updated material strengthens and corroborates the concerns originally reported, and provides further *prima facie* grounds for the initiation of a full criminal investigation.

### **1. Post-2022 Peer-Reviewed Studies**

Multiple peer-reviewed publications since 2022 have provided further evidence of serious adverse events following COVID-19 vaccination. These studies, published in reputable medical journals, include findings of increased incidence of myocarditis, pericarditis, thromboembolic events, and neurological syndromes.

### **2. Autopsy and Pathological Reports**

New pathological examinations, including autopsy studies conducted in several jurisdictions, have identified causal links between COVID-19 vaccination and unexpected deaths. Histopathological evidence, including spike protein detection in affected tissues, has been documented in high-impact forensic and medical reports.

### **3. Whistleblower Disclosures**

Since 2022, additional whistleblower testimony from medical professionals, data analysts, and former regulatory staff has emerged. These accounts provide insider confirmation of data

suppression, flawed safety monitoring, and pressure placed on regulators to downplay or ignore serious risks.

#### **4. Updated Pharmacovigilance Data**

Updated Yellow Card data, VAERS reports, and EudraVigilance figures reveal a continued and statistically significant pattern of severe adverse event reporting, with trends persisting despite declining vaccination rates. These data reinforce previously reported concerns and strengthen the evidence base for causation.

#### **5. Expert Witness Opinions**

Leading experts in epidemiology, pharmacovigilance, and forensic pathology have provided updated statements and analyses that directly corroborate the harms alleged in CRN 6029679/21. These experts, some of whom were cited in the original submission, have since issued revised opinions in light of the new evidence. **The person making the present crime report is in a position to connect police who are investigating the alleged crimes to experts in a number of relevant fields, who will be willing to provide updated expert witness statements and testimony.**

#### **Conclusion**

Taken together, this updated scientific and medical evidence not only corroborates the original allegations but also expands the evidentiary base. The cumulative weight of this material exceeds the reasonable suspicion threshold for the commencement of a criminal investigation under the CPIA 1996.

## **Dominic Cummings Testimony & Durham Constabulary Handling**

This exhibit highlights the relevance of Dominic Cummings' May 2021 parliamentary testimony to ongoing allegations of systemic investigative failure by UK police forces in relation to COVID-19-related criminal allegations, including those arising from the national Operation Talla response framework.

### **1. Relevant Dominic Cummings Testimony (May 2021)**

In sworn parliamentary evidence, Mr. Cummings stated that during the Government's COVID-19 response, senior officials and advisers operated under a directive to "***Ignore rules. If lawyers get in your way, come to us and we'll find ways of bulldozing them out of your way.***" Such a stance, if acted upon, which might very well have been the case and in all probability may have been, is incompatible with lawful governance and may constitute misconduct in public office if it resulted in breaches of statutory duties or the deliberate circumvention of legal safeguards.

The relevant element of Mr Cummings' testimony is the subject of the following web page

<https://ethicalapproach.co.uk/officialEvidence>

### **2. Report to Durham Constabulary**

In December 2023 - January 2024, a detailed report of alleged criminal conduct by members of the UK Government COVID-19 team was submitted to Durham Constabulary. This report referenced the above testimony as part of the evidential

context for allegations of conspiracy to pervert the course of justice and misconduct in public office.

Durham Constabulary refused to take investigative action. This refusal appears consistent with documented Operation Talla-style responses by other police forces, in which certain categories of COVID-19-related allegations, particularly those involving vaccine harms or senior governmental misconduct were deprioritised, rejected, or redirected without meaningful investigation.

### **3. Evidential Linkage to Operation Talla**

Operation Talla directives, including the 25 January 2022 NPCC/UK Gold Command guidance, instructed police forces to reject public reports relating to COVID-19 vaccine harms. The refusal by Durham Constabulary to act on the 2023 report, despite its evidential grounding and the seriousness of the allegations, suggests an extension of this suppression approach beyond the original directive period and into cases involving potential high-level misconduct.

### **4. Cross-Reference to Evidential Material**

The Durham Constabulary correspondence (Dec 2023 – Jan 2024) is available at -

[https://ethicalapproach.co.uk/durham\\_constabulary\\_correspondence\\_1.pdf](https://ethicalapproach.co.uk/durham_constabulary_correspondence_1.pdf) This should be read alongside this present documentary element for verification of the refusal to investigate and to assess consistency with Operation Talla-style suppression.

## Perseus Report on MHRA's Regulation of COVID-19 Vaccines

This document summarises key findings from the Perseus report (April 2023), which alleges serious systemic failures by the UK's Medicines and Healthcare products Regulatory Agency (MHRA) in regulating the safety and efficacy of COVID-19 vaccines. The purpose of this summary is to provide police investigators with an accessible and evidence-referenced overview suitable for inclusion in a criminal allegation file relating to vaccine safety.

### Key Findings (With References)

Unsafe Regulatory Approach: MHRA granted Conditional Marketing Authorisation after less than one year of trials - bypassing the usual 10-year safety development timeline. Novel mRNA and viral-vector products were regulated as conventional vaccines, lowering scrutiny on toxicology and biodistribution. No studies were required on spike protein production location, quantity, or duration despite known toxicity. *[Ref: Perseus Report, Section 8.3-8.14]*

Known and Emerging Safety Risks: Adverse effects include blood clotting (VITT), myocarditis, neurological injury, menstrual disorders, immunosuppression, and pregnancy complications. Analysis suggests as many as 1 in 800 recipients suffer a serious adverse event. Evidence of excess non-COVID mortality, especially cardiovascular deaths, since Spring 2021. *[Ref: Perseus Report, Sections 3, 4, 5]*

Failure to Investigate and Act: MHRA did not follow through on its 'Proactive Vigilance' monitoring; some surveillance strands left dormant for over a year. Fatal Yellow Card reports are not routinely investigated. No UK post-mortem programme for suspected vaccine-related deaths despite overseas findings.

*[Ref: Perseus Report, Sections 5, 6, 11]*

Conflict of Interest and Lack of Independence: MHRA primarily funded by pharmaceutical industry fees, including significant historical funding from pro-vaccine foundations. No independent safety audits conducted, unlike other safety-critical sectors. *[Ref: Perseus Report, Sections 14, 15]*

Quality Control Failures: Evidence of degraded RNA integrity in commercial batches vs trial batches, novel potentially toxic lipid nanoparticles, and lapses in manufacturing. Contracts prohibited independent vial testing. DNA contamination detected in some analyses. *[Ref: Perseus Report, Section 10]*

Misleading Public Messaging: MHRA, UKHSA, and NHS used the term 'safe' in vaccine promotion despite their own guidance warning against this. Relative risk reduction statistics used without absolute risk context, overstating benefits. *[Ref: Perseus Report, Section 12]*

## **Conclusion of the Report**

The Perseus report concludes that the MHRA has failed in its statutory duty to protect the public from harm in its regulation of COVID-19 vaccines. Given the scale of reported injuries and excess deaths, all COVID-19 vaccine use should be paused immediately pending a full independent inquiry into MHRA processes, decision-making, and governance. Victims must

receive prompt medical care, financial compensation, and practical support.

### **Relevance to Criminal Allegations**

The documented failures are systemic, ongoing, and have had foreseeable, serious consequences for public health. If substantiated, these findings may support offences including misconduct in public office, gross negligence manslaughter, and corporate manslaughter. This summary, with references to the original report, is intended for police evidential use.

The Perseus Report is available at - <https://perseus.org.uk>

## **Public Statement: Why this Evidence Pack Meets the Criminal Investigation Threshold**

We are lodging a comprehensive evidential report with multiple UK police forces, containing material which is considered to fully meet the legal threshold for a criminal investigation into serious allegations arising from the COVID-19 vaccine rollout and subsequent suppression of public reporting.

### **1. The Legal Threshold**

Under the Criminal Procedure and Investigations Act 1996 (CPIA), once police receive credible allegations supported by evidence indicating that a crime may have been committed, they are legally obliged to treat the matter as a criminal investigation. This brings into force duties to preserve evidence, pursue all reasonable lines of inquiry, and ensure transparency in investigative processes.

### **2. The Evidence We Are Presenting**

Our evidence pack contains:

- Reference to material lodged with the Metropolitan Police Service (MPS) in December 2021 under CRN 6029679/21, which we are now aware has been retained - this included expert witness statements, medical data, and documentary proof of alleged criminality.

- Proof that MPS has retained this material, despite their public claim that no investigation took place.
- New corroborating evidence from medical, legal, and scientific experts obtained since 2021, strengthening the original allegations.
- Documentation showing systemic suppression of reports by police forces under “Operation Talla” guidance, including examples from the MPS, Durham Constabulary and Hampshire Police – Link to the public engagement video with Hampshire Police in 2022 - <https://youtu.be/TBjWQ-A2Ams?si=3UB081vl63Bc2ZGn>
- Testimony from senior figures and whistleblowers highlighting political interference in policing and the bypassing of statutory safeguards.

IT should be pointed out that the National Police Chiefs' Council (NPCC) have made disclosures in relation to “Operation Talla” which are of very significant public concern – these NPCC disclosures can of course be provided.

### **3. Why Police Action is Now Essential**

The combination of:

- Credible, admissible, and corroborated evidence of serious indictable offences;
- Documentary proof of retained primary evidence; and
- Indications of national-level coordination to avoid

investigation; means that police have no lawful basis to ignore or refuse to investigate without risking allegations of misconduct in public office or perverting the course of justice.

#### **4. Public Accountability**

The public has a right to expect that serious allegations, particularly those involving potential harms on a national scale, are investigated with independence and integrity. The response of each force will no doubt receive the interest of a wide public audience, which is why the submissions now being made are being made with transparency.

It is believed that this material demands urgent and impartial investigation. If police decline to act, then a need to escalate issues through oversight bodies, parliamentary channels and the courts, as necessary, must be seriously considered.

## Judicial Review Decision of Judge Poole - Critical Flaw in Relation to CPIA 1996

### Background

In November 2023, His Honour Judge Poole handed down a judgment in Judicial Review proceedings concerning the Metropolitan Police Service's handling of Crime Reference Number 6029679/21. The claim sought to challenge the MPS' refusal to investigate allegations of serious indictable offences related to the COVID-19 vaccine programme. The relevant ruling is available to view at –

[https://ethicalapproach.co.uk/JR ruling AC-2023-LON-001880\(1\) 250803 133225.pdf](https://ethicalapproach.co.uk/JR ruling AC-2023-LON-001880(1) 250803 133225.pdf)

In dismissing the claim, Judge Poole accepted the MPS' submission that "no criminal investigation was carried out." The judgment did not address the statutory definition of a criminal investigation under the Criminal Procedure and Investigations Act 1996 (CPIA) nor the evidential material indicating that such an investigation had in fact commenced.

### Statutory Position – CPIA 1996

Section 23(1) CPIA 1996 defines a criminal investigation as:

***"An investigation conducted by police officers with a view to it being ascertained -  
(a) whether a person should be charged with an offence; or  
(b) whether a person charged with an offence is guilty of it."***

The statute does not require charges to be brought for an

investigation to exist. CPIA duties attach from the point police officers undertake investigative steps aimed at assessing potential criminal liability.

## Relevant Case Law

- R (Ebrahim) v Feltham Magistrates Court [2001] EWHC Admin 130 - The duty to preserve and disclose arises when an investigation is in contemplation, not merely when a suspect is charged.
- R v Chief Constable of Merseyside ex p Calveley [1986] QB 424 - The term “investigation” is to be given a broad meaning; includes inquiries aimed at determining if criminal conduct occurred.
- R v Ward [1993] 1 WLR 619 - Underscores the absolute duty to retain and disclose relevant material once an investigation has begun.

## Evidence Contradicting the MPS Position

Material in possession of the claimants in the JR indicates:

1. Multiple officers confirmed in early 2022 that an investigation was active.
2. Evidence was being received, logged, and reviewed by designated officers.
3. Senior officer directives existed concerning the handling of COVID-19 vaccine-related allegations (Operation Talla context).

These facts satisfy the CPIA statutory definition and contradict the assertion relied upon by Judge Poole.

## **Conclusion**

The JR decision is materially undermined by its failure to address whether statutory CPIA determinable duties had been triggered. The acceptance of the “no investigation” assertion without analysis of the statutory definition represents a critical flaw which provides a strong indication that a miscarriage of justice has taken place. Accordingly, this decision by Judge Poole ought not to be treated by police forces as a factual or legal bar to opening or re-opening a full criminal investigation.

## **Index of Evidence in Submission which is externally linked**

Email dated 12<sup>th</sup> August 2025 from PC Olly Hawkey (MPS Professional Standards –

[https://ethicalapproach.co.uk/PC\\_Hawkey\\_email\\_12082025.pdf](https://ethicalapproach.co.uk/PC_Hawkey_email_12082025.pdf)

Directive issued by ACC Alan Speirs in 2022 –

[https://ethicalapproach.co.uk/police\\_scotland\\_FOI\\_response\\_20.03.2025.pdf](https://ethicalapproach.co.uk/police_scotland_FOI_response_20.03.2025.pdf)

The Perseus Report -

<https://perseus.org.uk>

Hampshire Police Public Engagement (Video – 2022) –

<https://youtu.be/TBjWQ-A2Ams?si=snp6N6TRfOxN8L08>

HCID definition and the Downgrade of Covid 19 an a HCID –

Definition:

<https://www.gov.uk/guidance/high-consequence-infectious-diseases-hcid>

Downgrading of Covid 19:

<https://questions-statements.parliament.uk/written-questions/detail/2020-09-28/95975>

Dominic Cummings' Parliamentary testimony (2021) –

<https://ethicalapproach.co.uk/official-evidence>

Correspondence involving Durham Constabulary –

[https://ethicalapproach.co.uk/durham constabulary correspondence 1.pdf](https://ethicalapproach.co.uk/durham-constabulary-correspondence-1.pdf)

Flawed High Court Judgement handed down by Judge Poole (November 2023) –

[https://ethicalapproach.co.uk/JR ruling AC-2023-LON-001880\(1\) 250803 133225.pdf](https://ethicalapproach.co.uk/JR-ruling-AC-2023-LON-001880(1)-250803-133225.pdf)

Case Briefing Document and Lab Report (sent to all UK Chief Constables in February 2022) –

[https://ethicalapproach.co.uk/case briefing and lab report.pdf](https://ethicalapproach.co.uk/case-briefing-and-lab-report.pdf)