



The Moorland Association

Deputy Chief Constable N Harrison
North Wales Police HQ
Glan Y Don
Abergele Road
Colwyn Bay
LL29 8AW

22 August 2025

Dear DCC Harrison

Re: Meeting to discuss concerns regarding the Raptor Priority Delivery Group

I am writing to confirm that we look forward to our forthcoming meeting to discuss the concerns we first raised with you in September 2024¹. To assist our discussions, we have consolidated the issues raised previously with additional information that has since emerged and with material we have provided at the request of your office.

The Moorland Association and its members remain committed to constructive partnership with the police and other stakeholders. We manage over one million acres of land and continue to demonstrate leadership in conservation, not least through our major contribution to the Defra Hen Harrier Brood Management Scheme, which has delivered population gains now recognised as the most significant in 200 years. It is precisely because we value the principle of partnership that we wish to resolve the concerns set out below.

Key Concerns

1. Exaggeration and Misrepresentation of Crime

Police officers have visited estates asserting that crime “is happening” on moors, yet later acknowledged they merely “believe” this to be the case. Such inconsistency damages confidence and undermines partnership working. Public communications have at times implied guilt in the absence of evidence, including labelling areas as “crime hotspots.” This terminology is both inflammatory and unsupported by data, contributing to hostility towards land managers and staff.

2. Circumvention of Surveillance Safeguards

Requests have been made to landowners to permit installation of cameras and monitoring equipment without explanation of purpose or safeguards. While technically framed as “consensual,” this practice appears to bypass the statutory protections designed to uphold citizens’ rights.

¹ The Moorland Association first raised its concerns with DCC Harrison in a letter dated 18 September 2024.

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3. Withholding Information and Lack of Transparency

The NWCU has declined to share policy documents explaining how a stopped satellite tag transmission is interpreted as evidence of crime. Requests for clarification have been repeatedly dismissed, even though this information is essential for building trust and ensuring proportionate responses.

4. Inflammatory and Adversarial Communication

Police communications have employed language associated with activist campaigns, contributing to hostility towards keepers and their families. This is contrary to the IUCN guidance which stresses avoiding escalation of wildlife conflict situations.

Police officers have falsely claimed that the Moorland Association declined invitations to participate in visits. No such invitations were received. These inaccuracies remain uncorrected and have eroded confidence in official communication.

5. Biased Treatment of Stakeholders

The Moorland Association has provided full access to its satellite tag data and published final fixes. By contrast, the RSPB has not released equivalent data, yet appear to enjoy preferential treatment and access to police documents.

The removal of the Moorland Association from the Raptor Priority Delivery Group (RPDG) for raising legitimate questions contrasts starkly with the continued involvement of NGOs that have acted in ways which undermined police investigations.

6. Disproportionate responsibilities attributed to estates

Estates have been told they are responsible for satellite tag losses occurring many kilometres away, in some cases up to 70km, vastly expanding their supposed area of responsibility to the size of entire counties. Such claims are clearly unrealistic and undermine proportionality in enforcement.

7. Failure to acknowledge wider ecological evidence

Our locational analysis shows that clusters of final tag transmissions also occur well away from grouse moors. This evidence has been shared with the police, but has not been acknowledged in communications which continue to advance the activist narrative that only grouse moors are implicated.

8. Impact on mental health and community trust

The cumulative effect of unsubstantiated assertions, hostile language, and public insinuations is taking a measurable toll on gamekeepers, their families, and rural communities. Independent research has highlighted the frequency of abuse directed towards gamekeepers. We fear current police approaches are exacerbating rather than alleviating these tensions.

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Why this matters

These issues collectively risk undermining the objectives of the NPCC Rural and Wildlife Crime Strategy, particularly its commitments to fairness, transparency, partnership working, and evidence-based communication. They also appear to conflict with the College of Policing's Code of Ethics, which emphasises honesty, integrity, objectivity and respect.

Perhaps most significantly, the actions of the NWCU have directly undermined the Defra plan to recover hen harriers in England by eroding support for the Brood Management Scheme, which is operated under licence by Natural England and specifically designed to unlock the conflict. Instead of resolving wildlife conflict, these approaches have risked perpetuating it, to the detriment of conservation outcomes, community trust and the wider credibility of partnership working.

We believe these matters are not only important to the Moorland Association and its members, but also to the credibility of rural policing as a whole. Our overriding objective remains to work in partnership with you and your colleagues to address wildlife crime in a fair, transparent and evidence-led way.

We are confident that with your leadership, we can identify constructive solutions that strengthen trust between police, land managers and the wider community.

I look forward to discussing these matters with you in detail at our meeting.

Yours sincerely,

Andrew Gilruth
Chief Executive
Moorland Association

CC

- 1) Secretary of State for the Home Department, The Rt Hon Yvette Cooper MP
- 2) Secretary of State for Environment, Food and Rural Affairs, The Rt Hon Steve Reed OBE MP
- 3) Chief Constable of Northumbria Police, Venessa Jardine
- 4) Chief Constable of Durham Constabulary, Rachel Bacon
- 5) Chief Constable of North Yorkshire Police, Tim Forber
- 6) Chief Constable of West Yorkshire Police, John Robins QPM DL
- 7) Chief Constable of South Yorkshire Police, Lauren Poultney
- 8) Chief Constable of Cumbria Constabulary, Rob Carden
- 9) Chief Constable of Lancashire Constabulary, Sasha Hatchett
- 10) Chief Constable of Derbyshire Constabulary, Rachel Swann

Attachments

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- Annex 1 – Comparison of allegations against the Police Code of Ethics.
- Annex 2 – Comparison of the NPCC Rural and Wildlife Crime Strategy commitments against the alleged NWCUC/DPDG approach.
- Annex 3 – Detail of National Wildlife Crime Unit approach (NWCUC).
- Annex 4 – NWCUC letter sent to our members in June 2024.
- Annex 5 – Moorland Association cluster analysis information.
- Annex 6 – Map which illustrates how the NWCUC expands the area of land it considers estates are responsible for.
- Annex 7 – Comparison of public and private NWCUC communications.

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Comparison of allegations against the Police Code of Ethics

Allegation (these are documented in detail at Annex 3).

Breached Principles

Why it matters

1. Exaggerating / misrepresenting crime (asserting offences without evidence; implying guilt on social media)	Honesty & Integrity, Objectivity, Fairness	Misleads the public, undermines evidence-led policing, erodes trust in impartiality.
2. Circumventing surveillance safeguards (seeking consent without transparency)	Integrity, Accountability, Transparency	Risks unlawfulness; bypasses statutory safeguards; damages accountability.
3. Withholding information / refusing to explain policies	Openness, Accountability	Prevents scrutiny, undermines transparency, weakens legitimacy of decisions.
4. Inflammatory language ("crime hotspots")	Respect, Fairness, Objectivity	Stigmatises communities without evidence; escalates conflict instead of resolving it.
5. Biased treatment of stakeholders (RSPB favoured over Moorland Association; inconsistent sanctions)	Fairness, Objectivity, Selflessness	Shows partiality; damages community confidence; undermines equal treatment.
6. False claims (e.g. invitations issued/declined when not true)	Honesty & Integrity, Accountability	Knowingly providing false information breaches trust and core ethical duty of honesty.
7. Disproportionate punitive actions (removal from RPDG over minor issues)	Fairness, Objectivity, Proportionality	Inconsistent and unfair policing response; discourages cooperation.
8. Refusal to answer legitimate questions; accusatory tone	Respect, Openness, Transparency	Damages partnership working; creates perception of hostility and bias.
9. Endorsing partisan activist reports without neutrality	Objectivity, Transparency	Suggests endorsement of one side; undermines impartiality of policing role.

Summary: The pattern of conduct, if accurate, constitutes material breaches of the Code of Ethics. The most significant failures are in honesty, objectivity, fairness, openness and accountability, all of which are fundamental to public confidence in policing.

Annex 2

Comparison of the NPCC Rural and Wildlife Crime Strategy (2022-2025) commitments against the alleged NWCU/RPDG approach

NPCC Strategy Commitment	Alleged NWCU/RPDG Behaviour (see Annex 3)	Conflict
Partnerships: “Work in partnership to reduce crime and protect rural communities and wildlife”.	Refusal to answer questions; exclusion of Moorland Association from RPDG; punitive removal for minor disputes.	Breaks collaborative, trust-building approach; undermines partnerships.
Transparency & Accountability: “Improve intelligence and information sharing among partners”.	Withholding policies on how crime is defined; refusing to share reasoning; selective disclosure to some NGOs only.	Contradicts the requirement to share information openly and consistently.
Evidence-based Communication: “Develop communication and engagement plans to promote education, outcomes and prevention work”.	Use of inflammatory language (“crime hotspots”); exaggeration of crime levels; endorsing partisan NGO reports.	Undermines confidence; replaces neutral communication with adversarial or activist-aligned language
Fairness & Consistency: PDGs should include “the broadest range of partners possible”.	RSPB allegedly favoured (given access, tolerated despite undermining investigations) while the Moorland Associations are excluded for raising concerns.	Shows bias and unequal treatment of stakeholders.
Protection & Prevention: “Protect the vulnerable, prevent harm to individuals, communities and wildlife”.	Alleged actions escalating conflict; negative mental health impact on gamekeepers and families.	Fails to reduce harm; increases stress and division within communities.
Governance & Scrutiny: “Implement robust governance and scrutiny demonstrating value for money and performance outcomes”.	Refusal to explain actions or provide justification; claims made without evidence.	Lack of accountability; weakens oversight and scrutiny.

Summary: The NPCC strategy calls for collaborative, transparent, fair and evidence-based policing in rural and wildlife crime. The alleged behaviour of the NWCU/RPDG conflicts with multiple pillars of the strategy. In particular partnership working, transparency, evidence-based communication and fairness.

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Detail of the National Wildlife Crime Unit (NWCUC) approach

This annex was first submitted in 18 September 2025. Updates are shown in blue.

	Comment	Source
I. Exaggerating crime	These police officers have been visiting our members and asserting to them (and the Moorland Association by email) that crime “is happening”¹ on their moors. When challenged on this² the police then state “<i>Theres (sic) never been a mention of knowing a crime is happening</i>”³ the police simply “believes” crime has happened.’ We feel the police should be both clear and consistent if it wishes to build trust. Throughout this exchange the police never give thought to the fact that on non-grouse shooting moors 33% of ‘missing’ satellite tags are not recovered⁴. Hence a lost tag does not necessarily equate to a crime. The police have also asserted, during visits to our members, that hen harriers do not leave moors. This ‘fact’ has been used to suggest that where birds have left a moor this is because they have been illegally disturbed. This suggests a poor understanding of raptor ecology. Satellite tracking map⁵ evidence undermines the police claim and so confidence in what it is doing. These visits have also been widely publicised⁶ on social media by the police, which only further infers guilt.	1. “where crime is happening” NWCUC email to the Moorland Association on 10 July 2024 and during NWCUC meetings with our members in 2024. 2. Email from the Moorland Association to the NWCUC, 11 July 2024. 3. Email received 12 July 2024. 4. See Section 6, Cluster Analysis (below). 5. Maps have shown this for years. This one from 2016 https://community.rspb.org.uk/ourwork/skydancer/b/skydancer/posts/follow-that-bird-hen-harrier-satellite-maps-go-live 6. As detailed in the email the Moorland Association received from the NWCUC, 22 May 2024.

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	The objective⁷ of the police RPDG is to ‘Raise community trust and awareness to facilitate intelligence and incident reporting, leading to increased prevention and enforcement activity relating to Bird of Prey Crime’. We feel the police actions⁸ are undermining the RPDG objective. We also feel the delay⁹ in addressing these concerns had a negative impact on this year’s plan to implement all elements of the Defra hen harrier recovery plan¹⁰. The aim of the plan is to help boost the population in England. The Brood Management Scheme, which played a key role in increasing the harrier population to a 200-year high has not taken place in 2025. We feel the NWCUC’s exaggeration of the situation has acted against the licence application to Natural England. The unintended consequence is that a conservation scheme designed to unlock the known wildlife conflict has not been available this year and so has exacerbated the conflict situation. In December 2024 the NWCUC provided a quote for a Natural England press release in relation to two hen harriers fitted with Moorland Association tags as part of the Defra Brood Management Scheme – a scheme designed to unlock the proven wildlife conflict situation¹¹. The bodies had been recovered and sent for postmortem. Neither confirmed illegal killing as the cause of death, yet the NWCUC stated with	7. https://www.nwcu.police.uk/how-do-we-prioritise/purpose-process-and-responsibilities-of-a-priority-delivery-group/ 8. Also see Sections 2 to 10 (below) for more police actions undermining this objective. 9. These concerns were first communicated to DCC Harrison by letter, 18 September 2024. 10. The Defra plan to recover the hen harrier population in England can be accessed here https://assets.publishing.service.gov.uk/media/5a81b18f40f0b62305b90546/hen-harrier-action-plan-england-2016.pdf 11. https://naturalengland.blog.gov.uk/2024/12/18/update-on-the-deaths-of-three-tagged-hen-harriers/
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	absolute confidence they were “<i>victims of crime</i>”. We feel this is inflammatory rhetoric. The NWCUC also claimed that there had been “<i>a significant decrease in crimes involving tagged birds</i>”. This appears to be an attempt by the NWCUC to take credit for reducing crime, yet it forgot to mention that very few have been fitted recently due to the dire breeding season. Since the NWCUC has previously stated that it has only investigated two hen harrier incidents for each of the previous three years, it is not clear to us how there can have been a ‘significant’ decrease. Either way, if this number has been reduced to zero it should be celebrated and not couched in such negative rhetoric. Lastly, the tags in the Brood Management Scheme were not fitted for crime detection and the NWCUC were wrong to suggest otherwise. They were fitted, under licence, to see if captive reared birds behaved differently (once released) to wild reared birds. Through conflating this the NWCUC has weaponised a conservation tool and these tags are now seen by the upland community as a tool to smear the reputation of moorland managers. It has also since transpired (see Section 6) that the NWCUC considers that grouse moors are not only responsible for activity on their own moor but also the surrounding land. In one case a bird that went missing from a nest 5km away was, simply attributed to the grouse moor. In another the estate was told it was responsible for any	
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		missing birds within the surrounding 70km. This increased the size of the estate 90 times and made it responsible for an area of ground twice the size of North Yorkshire. This is clearly absurd. In no way could the suggestions of the NWCUC be seen as proportionate.	
2.	Circumventing surveillance regulation	The 'belief' above is now being used by the police to ask our members for consent to install cameras and other monitoring equipment without sharing what the police are doing¹. (see Annex 4) This appears to be an attempt to circumvent the surveillance regulations designed to protect law abiding citizens^{2,3}. If the police have evidence that crimes are happening it already has powers to undertake covert surveillance and there is no need to seek permission. We feel these are legitimate questions which the police should answer. The NWCUC has refused to do so on the basis we attended a briefing about these police visits. However, the police briefing did not cover this point and hence the questions. They remain unanswered⁴.	1. Police Land Permission Letter shared with the Moorland Association, email 8 July 2024. 2. The Moorland Association first asked for clarity on this by email 8 July 2024. Our concerns were outlined in our blog here www.moorlandassociation.org/2024/07/blog-surveillance-why-are-the-police-bypassing-regulation/. 3. The Moorland Association asked for an explanation again by email on 9 July 2024. 4. The police have explained that if a landowner has given consent for monitoring (even where the police do not say what it is doing) this is not covert surveillance. We accept this technical point and have published this on our website. However, that does not answer our question. Why do the police appear to be circumventing UK surveillance regulation?
3.	Withholding information	Examples where we believe information has unreasonably been withheld include: Where a satellite tag fitted to a bird stops transmitting, and no evidence is recovered, these police officers refuse to share^{1,2} how it concludes it is a crime. We are told a policy document exists, but we can't read it because it does not need our help³. We feel	1. The Moorland Association requested this information by email 10 July 2024 and again by email 22 July 2024. 2. See Section 5, Biased treatment (below) where the same logic is applied by the police.

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		that if the NWCUC wish to state crimes are happening, where there is no evidence, it must share the police policy which allows it to reach this view. Birds of prey travel and move across large areas of moorland. However, these police officers have stated crimes 'have' been committed even when satellite tracking data shows they were alive long after leaving their land. The NWCUC have not shared their policy on how they conclude this is so.	3. Email received from the police 11 July 2024.
4.	Inflammatory language	The NWCUC describes areas of final satellite tag transmissions from birds as 'crime hot spots'¹. This is highly inflammatory because the evidence does not support the claim². Nor will the police share its policy on how these are defined³. The NWCUC states it recognises that 'no-one wants the label of a crime hotspot'⁴. It appears clear to us that it knew the term was inflammatory. Either way the Moorland Association feels it is fair to receive clarity on how the police define this description. The NWCUC has since been writing to our members, with yet more inflammatory letters. These state, "the police starting position is neutral and as unbiased as possible" (we note and question when is it not possible for the police to act in a neutral way) and that the NWCUC was to "prevent further crime" on our members land but also state that "we do not have any evidence relating to these crimes". We do not feel this is	1. Police press release May 2024 here https://candofm.co.uk/news/hen-harrier-task-force-launched-to-tackle-illegal-persecution/ and emails 22 May 2024, 8 July 2024, 12 July 2024, 29 July 2024. 2. See Section 5, Cluster analysis (below) 3. See Section 5, Biased treatment (below). 4. Email received 22 May 2024.

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		neutral or unbiased. Since the NWCUC are now stating there is no evidence of crimes, we do not feel it is neutral or unbiased for the NWCUC to also be referring to “<i>crime hotspots</i>”. In December 2024 the NWCUC began writing to some of our members to say that it was “<i>pleased to report that there have been no further reports</i>” of suspected activity. This appears a combination of self-justification and the continued pursuit of a hugely biased agenda. In August 2025 the NWCUC continued to use inflammatory language in private (see Annex 7, Appendix A) unlike in public (see Annex 7, Appendix B). We feel the private communications with grouse moors is inconsistent with the ethical principles or strategic commitments of UK Policing (see Annex 7, Appendix C). We believe the NWCUC’s use of activist language and the failure to distance itself from those seeking to smear the reputation of those working on moorlands has contributed to the high levels of abuse gamekeepers receive. A report produced by Professor Simon Denny⁵ has reported that an English moorland gamekeeper is physically assaulted every 12 days.	5. Report by Prof. Simon Denny can be accessed here https://f20ead8a-2979-4fd6-9990-9784b9a21c0c.usrfiles.com/ugd/f20ead_88abad5fd00b4578abac26c87d97fe10.pdf
5.	Biased treatment	The Moorland Association has given the police full access to all our satellite tag data and we have put all final fixes in the public domain¹. We have asked² to read the policy which explains how the police interpret our tags and data.	1. Moorland Association satellite tag data is published here www.gov.uk/government/publications/hen-harriers-tracking-programme-update/hen-harrier-tracking-update 2. Moorland Association email 10 July 2024.

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	The document is marked 'Official Police & Partners' and we were asked what we intended to use it for and that we would need a secure email address to receive it³. We suggested it could be put in the post⁴ (Government Security Classification Guidance 722 states this is permitted) and that we would “<i>promote better understanding within Moorland Association members</i>”. However, we then received an email dismissing our information request stating that the police “<i>don't feel the police need support with levels of suspicion or when to suspect a crime</i>”⁵. Thus, entirely missing the point and an opportunity to build community trust. In contrast we believe the RSPB has been given this document. However, we understand that the RSPB has not given the police full access to all RSPB tag data. Nor has the RSPB published final fixes of its tags, as we have. We also note the RSPB has shared covert footage, of an alleged moorland incident, with the national media before the police had been given the opportunity to investigate⁶. In doing so we feel the RSPB has undermined police activity. We are unsure if the footage was lawfully gathered (the RSPB has refused to clarify this point). We note the Moorland Association was removed from the Priority Delivery Group for asking legitimate questions about NWCU actions, yet	3. Police email 11 July 2024 (9.18am) 4. Moorland Association email 11 July 2024. 5. Police email 11 July 2024 (6.30pm)
		6. The media outlet confirmed to the Moorland Association that the footage it was in possession of had not yet been shared with the police.

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		the RSPB, which has directly undermined the police is not removed. It appears the NWCUC is content for the RSPB to be acting this way. We feel this is another example of police officer bias within the NWCUC.	
6.	Cluster analysis	Our detailed analysis on final transmissions from satellite tags shows that 'clusters' of these also occur outside grouse moor areas. However, the police repeatedly refuse to acknowledge this is the case and incorrectly assert these clusters are only found on grouse moors¹. We have asked for the police definition of a 'hot spot' to be shared², in response the police state it "will not be sending you [Moorland Association] anything relating to the work of the PDG"³. This police position directly undermines the purpose of the recent visits, which it says is "about building relationships between estates, staff and the police". Nor is this "open and transparent" as the police claim⁴. We were asked by your office (15 October 2024) to provide our analysis that there are also clusters of final transmissions well away from grouse moors. This information (see Annex 5) was provided on 11 November 2024. This neatly illustrates why it is quite wrong for the NWCUC to continue to advance the activist narrative that clusters of missing tags are only found on grouse moors. At Annex 5 page 16 you can see a cluster of five final bird transmissions in the Kielder	"the only hot spot areas are on land relating to grouse shooting" email 12 July 2024. Our data analysis reveals that the second largest of these clusters is well away from driven grouse moors. Our analysis demonstrates that a greater percentage of birds are either lost beyond driven grouse moors or as a result of natural causes rather than by possible illegal killing on driven grouse moors. Since there is no way of knowing how many unrecovered birds died from natural causes (33% of birds lost beyond grouse moors are not recovered, there is no reason why the two groups would become diseased at different rates) – thus the potential for illegal killing on driven grouse moors must be exaggerated. The police appear to have simply adopted the inflammatory views of the RSPB press office. 1. Moorland Association email 22 July 2024. 2. Police email 29 July 2024. 3. Police email 31 July 2024 4.

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	Forest area. On page 17 a cluster of a further five final transmissions on the Isle of Man. One of the NWCUs 'crime hotspots' is on a grouse moor owned by one of our members. This, so called, 'crime hotspot' was based on three birds. The first stopped transmitting 70km away from the estate and the NWCUs assertion was that the estate was responsible. Quite how any estate is responsible for an area that is twice the size of North Yorkshire (See Annex 6) is not clear. The satellite data for this bird has never been shared. The second bird was a Moorland Association hen harrier so we have the data. We know this bird had been slowly travelling north since its release in early July. On the day it stopped transmitting it started some way south of the estate, before them moving through it and stopped transmitting in a forest north of the estate. The third bird spent over two weeks on the estate and left two days before it stopped transmitting. On this basis the NWCUs using the word 'hotspots' clearly implies involvement or connection with these incidents, which is totally unsubstantiated and the premise for such an accusation is very tenuous to say the least. It should be noted that it is perfectly lawful to disperse these birds from your land when they are not breeding. If the NWCUs continues to make such wild allegations, why would any reasonable person wish these birds to remain on	
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		their land? Having got to the harrier population to a 200-year high why are the NWCUC so intent on dismantling success?	
7.	False claims	These police officers have falsely claimed that the Moorland Association had been invited to attend their visits to our members¹. Even more strangely, they have repeatedly asserted that we had declined² the invitation – even when told it is false³. No acknowledgement or apology has been received. The police continue to make this claim^{4,5}. We note that even since we brought this to DCC Harrison’s attention (18 September 2024) the NWCUC continued to make this false claim to Partners. Since others know this is not true it is undermining the RPDG objective to “<i>raising community trust</i>”. We also understand that the RPDG is still telling partners that the Moorland Association is invited to meetings. No invitation, or apology has ever been received by the Moorland Association.	1. Emailed received 8 July 2024. By return email, that day, we explained that no invitation had been received. 2. Email received 8 July 2024. 3. Moorland Association email 8 July 2024. 4. Email received from the police 16 July 2024. 5. Email received from the police 31 July 2024. 6. See email sent to TI Dunn 11 November 2024.
8.	Deliberate obstruction	The NWCUC asked the Moorland Association to update its wildlife crime action report¹, but as soon as we asked for a copy to populate, we were told that we can’t see it because it can only be emailed to us, but the police can’t do so because we don’t have a secure email address².	1. Email received 11 July 2024 and 29 July 2024. 2. We note <i>Government Security Classification Guidance (722)</i> allows information to be sent by post.
9.	Disproportionate requests	These police officers requested the deletion of a single Moorland Association blog updating our members on the current situation and then using this request as a pretext to terminate RPDG Partnership membership – despite the police	1. We confirmed the blog had been updated by email and the police acknowledged this by email, 16 July 2024 2. Email received 8 July 2024 described the blog as “<i>wrong</i>”. 3. “<i>Factually incorrect</i>” On 10 July 2024.

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	acknowledging we had added a clarification¹. The police never told us what was factually wrong with the blog it just kept making the assertion^{2,3} hence we could not further update our members. In contrast the NWCU has taken no action against RPDG Partners that have taken legal action to try and undermine DEFRA's successful plan to remove the cause of wildlife crime against hen harriers⁴, nor when the RSPB Partnership member criticised the NWCU at a public protest event attended by police officers⁵. We note the RSPB wildlife investigation unit has been criticised in court for gathering information unlawful activity⁶. We are not aware of any action being taken by the police or the NWCU. Unlike the RSPB, the Moorland Association has not acted unlawfully nor publicly criticised the police. However, the NWCU feels it can criticise us for asking legitimate questions and use this a pretext for no longer speaking to the Moorland Association.	4. https://community.rspb.org.uk/ourwork/b/martinharper/posts/an-update-on-the-rspb-s-legal-challenge-of-natural-england-s-decision-to-grant-licenses-to-trial-brood-management-of-hen-harriers 5. Mark Thomas, RSPB Head of Investigations (RPDG member) gave a speak at Hen Harrier day (18 August 2024) which included the phrase “<i>when the police aren't good enough</i>”. 6. https://sporting-gun.com/article/rspb-case-thrown-out-of-court
10. Refusing to answer questions	Police officers in the NWCU have repeatedly refused to answer legitimate questions raised by the Moorland Association¹. Instead, they have: - questioned if our staff are “<i>on the same side</i>” as the police². - accused the Moorland Association of wasting police time³.	1. Police email 29 July 2024. 2. Police email 8 July 2024. 3. In relation to the application of IUCN guidelines on conflict resolution the police said the Moorland Association was “<i>wasting time</i>” email dated 6 June 2024. 4. Email dated 16 July 2024. 5. Email dated 29 July 2024. We requested details and explained that not a single journalist had approached the Moorland Association. We were aware activists have commented on social media (we don't recognise this a reflection public opinion nor undermining public confidence in the police).

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		- claimed public confidence in policing has been undermined⁴ but failed to provide evidence^{5, 6}. - stating that complaints had been received⁷ about us but refused to provide any details. - stated that we have not answered questions⁸ but failed to share what these are. - Accused the Moorland Association of “<i>attacking the wrong people</i>”.⁹ - used the points listed above to terminate membership of the RPDG¹⁰. After we posted a blog updating Moorland Association members on this development¹¹ we were criticised by the police for briefing our members a second time¹² and the equally confusing claim that it was our member of staff, rather than the Moorland Association, which was the RPDG member. The email claims that the police email sent nine days earlier had been “<i>clear</i>” about this point. That is not the case^{9, 10}. It suggests that the NWCU might have begun to realise its actions were disproportionate. The situation outlined above does not sound fair or proportionate. We feel confidence in the police is being undermined by its own actions with significant detrimental consequences. The actions of the RPDG are undermining its own objective¹³.	6. Freedom of Information (Fol) request 255/2024 suggests there were no emails received from RPDG Partners in relation to this. 7. Refusing to share a single complaint to support this police view, email dated 29 July 2024. 8. Email received 29 July 2024. We asked that day, be email, what these questions are but never received clarification. 9. Email received 8 July 2024. 10. Email received 20 July 2024 terminated our membership of the RPDG and “<i>thanked the Moorland Association for the loyal service over the years</i>”. 11. www.moorlandassociation.org/2024/07/moorland-association-departs-the-bird-of-prey-crime-priority-delivery-group 12. Email received 29 July 2024. 13. The objective of the police RPDG is to ‘<i>Raise community trust and awareness to facilitate intelligence and incident reporting, leading to increased prevention and enforcement activity relating to Bird of Prey Crime</i>’. https://www.nwcu.police.uk/how-do-we-prioritise-purpose-process-and-responsibilities-of-a-priority-delivery-group/
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Annex 3

11.	NWCU endorsing activist views	In October 2024 the NWCU chose to publish the most recent <i>RSPB Birdcrime</i> report on its Wildlife Crime DISC Hub. This is a highly partisan document which blends truth with half-truth and large quantities of supposition. We can only assume that, since it was posted without police comment to say otherwise, the police endorse it. The police should have distanced itself from this highly divisive and inflammatory document.	1. See Moorland Association email to the police, 11 November 2024.
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UK National Wildlife Crime Unit
Stirling Police Office
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St. Ninians Road
Stirling
FK8 2HD
Tel: +44 (0) 1786 833 722
Fax: +44 (0) 1786 456 472
www.nwcu.police.uk
ukwildlifecrime@nwcu.pnn.police.uk



[REDACTED] June 2024

Dear [REDACTED]

In your capacity as land agent of [REDACTED] you attended a meeting today [REDACTED] June 2024 with officers of the National Wildlife Crime Unit (NWCU) and North Yorkshire Police.

During our visit, you were made aware that we have developed a multi-agency Hen Harrier Task Force following several reports of satellite tagged Hen harriers going missing within the counties of Cumbria, Northumberland, Durham, North Yorkshire, Lancashire, West Yorkshire, South Yorkshire and Derbyshire.

You were informed that as part of our Estates and Community Engagement model, we are conducting visits to locations throughout the North of England which have been identified as hotspot areas of concern.

Today, we shared the following information with you:

1. Hen harrier satellite tagging projects ongoing in the North of England.
2. Concerns regarding Hen harrier persecution.
3. Analysis of satellite tag data, completed by the NWCU, which identifies [REDACTED] as being within a hotspot area of concern.
4. Explained that only incidents which were graded as confirmed criminal or suspected criminal were included in the analysis and that analysis is based on police data.
5. Relevant offences under the Wildlife and Countryside Act 1981 and other associated crime such as theft, criminal damage and firearms offences may have been committed.
6. How to report intelligence/incidents to the Police.

Satellite tagged Hen harriers are known to frequent [REDACTED] and potentially roost and nest on estate land. I would like to make it clear that at this time, this visit is primarily part of our Estates and Community Engagement model.

As part of our Estates and Community Engagement model, we are seeking your cooperation to authorise officers of North Yorkshire Police to undertake high visibility patrols on [REDACTED]. These patrols could be alongside estate staff which will assist in building relationships, trust and gathering intelligence.

We are also seeking your permission to allow the NWCU and or North Yorkshire Police to access the estate land to install cameras, proximity alarms and other equipment on and around vulnerable nest and roost sites. Consideration would be given to the right to privacy

and the work on the estate. These cameras would help us to mitigate risks, detect potential criminality and boost public confidence. We do have a pre-populated Land Permission letter, which we can give you today to sign if you agree.

However, being open and transparent, we must make you aware that should a satellite transmitter indicate a sudden stop in transmission and there is suspicion of criminality, it is the duty of police, along with other partner agencies to undertake an initial investigation into the circumstances of the sudden stop in transmission.

We must also point out that this may result in a Section 19 Wildlife and Countryside Act 1981 search being conducted on [REDACTED] must reiterate, it is the duty of law enforcement agencies to undertake an initial investigation and to rule out any form of criminality.

The NWCU and our partners are committed to keeping people safe, preventing criminality, and taking enforcement action where criminality impacts on the safety or livelihood of individuals or communities.

You have been provided with this letter simply as a summary of relevant information and to stress our willingness to work with [REDACTED] on promoting Hen harrier conservation.

Yours sincerely

A handwritten signature in black ink, appearing to be 'M. Harrison', with a long horizontal stroke extending to the right.

Detective Inspector Mark Harrison
National Wildlife Crime Unit

Enc: Relevant Legislation

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A handwritten signature in black ink, appearing to be 'M. Harrison', with a long horizontal line extending to the right.

Detective Inspector Mark Harrison
National Wildlife Crime Unit

Enc: Relevant Legislation

Legislation

Wildlife and Countryside Act (as amended) 1981

Section 1 (1) (a) a person is guilty of an offence if they intentionally kill, injure or takes a wild bird

Section 1 (2) (a) a person is guilty of an offence if they are in possession of a live or dead wild bird, or any part of it

Section 5 (1) (d) a person is guilty of an offence if they use for the purpose of taking a wild bird any sound recording

Section 18 (1) a person is guilty of an offence if they attempt any of the aforementioned offences

Section 18 (2) a person is guilty of an offence if they are in possession of any item capable of being used to commit any of the aforementioned offences

Part 2 Section 28P Wildlife and Countryside Act 1981 (England only). SSSI and SPA, SAC and RAMSAR layers can be found on www.magic.gov.uk.

Basic definition of Theft.

(1) A person is guilty of theft if he dishonestly appropriates property belonging to another with the intention of permanently depriving the other of it; and "thief" and "steal" shall be construed accordingly.

(2) It is immaterial whether the appropriation is made with a view to gain, or is made for the thief's own benefit.

Fraud by false representation

(1) A person is in breach of this section if he—

(a) Dishonestly makes a false representation, and (b) intends, by making the representation—

(i) to make a gain for himself or another, or

(ii) to cause loss to another or to expose another to a risk of loss.

(2) A representation is false if—

(a) it is untrue or misleading, and

(b) the person making it knows that it is, or might be, untrue or misleading.

(3) "Representation" means any representation as to fact or law, including a representation as to the state of mind of—

(a) the person making the representation, or

(b) any other person.

(4) A representation may be express or implied.

(5) For the purposes of this section a representation may be regarded as made if it (or anything implying it) is submitted in any form to any system or device designed to receive, convey or respond to communications (with or without human intervention).

Destroying or damaging property

Section 1(1) CDA 1971 - A person who without lawful excuse destroys or damages any property belonging to another, intending to destroy or damage any such property, or being reckless as to whether any such property would be destroyed or damaged, shall be guilty of an offence.

Aiders and Abettors - Magistrates Court Act 1980

Section 44 (1) – A person who aids, abets, counsils or procures the commission by another person of a summary offence shall be guilty of the like offence and may be tried (whether or not he is charged as a principal) either by a court having jurisdiction to try that other person or by a court having by virtue of his own offence jurisdiction to try him.

Section 44 (2) – Any offence consisting of aiding, abetting, counselling or procuring the commission of an offence triable either way (other than an offence listed in Schedule 1 to this Act) shall by virtue of this subsection be triable either way.

Land Permission Letter



Dear National Wildlife Crime Unit

Date:.....

Following on from your visit to [REDACTED] regarding the work of the multi-agency Harrier Task Force and the concerns raised regarding hen harrier persecution,

Please tick all that apply:

☐ I provide authority for officers of North Yorkshire Police to enter the land under my management at any time and to use equipment for the purposes of crime prevention and detection.

☐ I provide authority for officers from the NWCU to enter the land under my management at any time to install cameras, proximity alarms and other equipment on and around nest and roost sites.

Please complete the following below:

Name:

Position on Estate:.....

Estate:

Address:.....

.....

.....

Postcode:.....

Telephone:.....

Email:.....

I understand that whenever possible, North Yorkshire Police or the NWCU will notify me or a nominated member of my staff that they will be going onto [REDACTED] and to carry out crime prevention work. However, on occasions, this may not always be possible for operational reasons.

Print Name:

Signed on behalf of [REDACTED]

Date:

Print Name:

Signed on behalf of NWCU:

Date:

Witness Name:

Occupation / Position:

Date:

DEFINITIONS:

1. Moorland Association – ‘M.A.’
2. Police forces / units etc. – ‘the Police’
3. Platform Transmitting Terminals – ‘satellite tags’ – OR – ‘tags’
4. ‘Final Transmission Locations’ which may be referred to by others as the ‘Last Known Fix’
5. hen harrier (*circus cyaneus*) – ‘harrier’
6. Microwave Telemetry Incorporated – ‘M.W.T.’
7. Ordnance Survey – ‘O.S.’
8. Natural England – ‘N.E.’
9. Royal Society for the Protection of Birds – ‘R.S.P.B.’
10. Hawk and Owl Trust – ‘H.O.T.’

CONTENTS:

1. Brief summary of contents
2. M. A. objectives.
3. Data sources used and / or required.
4. Methods used to identify and map the data available.
5. The M.A. – ‘Status’ – definition system.
6. The mapping scale problem.
7. M. A. final transmission location example maps.
8. Area results and clusters.
9. Examples (12) of wider final locations mapped.

SECTION 1 – Brief summary of contents.

This document is in response to the following request – *‘It is stated that your ‘your’ refers to the M.A.) detailed analysis on final transmissions from satellite tags shows that clusters also occur outside of grouse moor areas. Please could you share this analysis with me’*

From the following, and by reference to a great deal more detail which we have available and is too extensive to be included within these notes, it should be noted:

1. The M.A. system of analysing final transmission locations is very accurate (see Section 4).
2. The clusters shown (see Section 8) are particularly good examples, in each case with five birds recorded they clearly illustrate the subject of the request.
3. The further examples of wider final transmission locations (see Section 9) also serve to illustrate the point that harriers are far from being confined to moorland habitats, the casual observer might be most surprised to see the range of final destinations.
4. It is the M.A.’s belief that, were all final locations to be made available (see Section 2 and Section 3 – which could potentially total some 300/350 birds extra), these varied locations and the wide dispersals demonstrated would be confirmed as regular occurrences.
5. Thus far, M.A. research indicates that final transmissions are very far from being exclusively associated with land used for driven grouse shooting – indeed, the majority are not – which, whilst being against the flow of misinformed opinion and prejudice, is substantiated by the hard facts the M.A. have to hand.

SECTION 2 – M.A. objectives:

The objectives of the M.A. when deciding to produce accurate locational mapping of final transmissions could not be more straightforward.

The aim was, and continues to be, the compilation of an accurate register of all harriers which have been tagged in England since the commencement of that practice, which is currently understood to be during the 2007 breeding season.

The register will carry an accurate identification of every bird handled by reference to:

FIRST – the tag serial number (usually expressed as # 123456 for example)

SECOND – a further identifier such as:

- In the case of the M.A. reference system – (expressed as F1-R1-2024 for example)
- Or a name ('Ethel' for example) given to a bird by N.E. – the R.S.P.B. – the H.O.T. – or another.

With such a resource it will be possible to identify (to an accuracy of 100 metres) the final transmission location of every bird, and with the accurate references appended the full history from – initial nesting / ringing – parentage where known – subsequent sightings – and eventual recovery and / or loss of signal – will be recorded.

SECTION 3 – Data sources used and/or required.

The data in respect of every bird tagged during the Hen Harrier Brood Management Trial by the M.A. have been submitted to N.E. and are listed on their hen harrier website:

www.gov.uk/government/publications/hen-harriers-tracking-programme-update/hen-harrier-tracking-update

This website – see 31st December 2023 the date of the M.A. study – contained 97 entries which were split – 41 x M.A. birds and 56 x N.E. birds giving the total of 97.

Unfortunately, of the 97, some 13 sites were listed as confidential and did not carry locational data. This resulted in the accurate mapping results being reduced to 84 locations.

Regrettably, despite requests, the R.S.P.B. will not release any locational data for reasons which the M.A. cannot understand. The three organisations tagging harriers are N.E., the M.A. and the R.S.P.B. – with the R.S.P.B.'s withholding of data being most unfortunate. It is presently estimated that some 206 birds (see R.S.P.B. – Bird Crime Report – 2023 – Page 33) could be added to the register were they to change their approach.

The production of a truly comprehensive register is so self-evidently desirable that the non-participation of the R.S.P.B. is both baffling and extraordinary.

SECTION 4 – Methods used to identify and map the data available.

The satellite transmissions report using Latitude and Longitude coordinates – in Degrees / Minutes / Seconds – when communicating with their base station.

These coordinates can then be converted to O.S. references – the resulting data is resolved to an accuracy of 100 metres – this is the O.S. six figure reference level – with O.S. eight figure references then being within 10 metres.

The references are then printed onto:

FIRST – an O.S. 1:50,000 – ‘Landranger’ map (scale: 2 centimetres to 1 kilometre – equivalent to 1.25 inches to 1 mile) to illustrate the general area in question – this map covers an area when printed on A4 @ 80% of approximately 18 kms. x 12 kms. (approximately 11 miles x 7.5 miles).

SECOND – an O.S. 1:25,000 – ‘Explora / Pathfinder’ map (scale: 4 centimetres to 1 kilometre – equivalent to 2.5 inches to 1 mile) to illustrate the precise area in question – this map covers an area when printed on A4 @ 200% of approximately 3.5 kms. x 2.5 kms. (approximately 2 miles x 1.5 miles).

This method, in combination, permits a good general assessment of the area whilst then affording a highly detailed final location.

Examples of the resulting maps can be seen in – Section 7 – Example maps – herein.

SECTION 5 – the M.A. – ‘Status’ – definition system.

With the final locational data to hand, all as described above, it must then be analysed. This is done by virtue of the considerable knowledge which the M.A. have of the areas in question and of the activities carried out thereon. Should there be a question of the definition of land use within an area then the M.A. area / field liaison officers can quickly verify. All of which allows the M.A. to designate the final transmission locations using the following system:

- **BLUE status – transmissions continue.**
- **ORANGE status – position is inconclusive.**
- **RED status – unexplained final transmission on a driven grouse moor.**
- **GREEN status – either an unexplained final transmission on ground unrelated to a driven grouse moor – or – a known event / recovery confirmed as death by natural causes.**

This system will be incorporated into – Section 8 – Examples of clusters in Green status locations.

SECTION 6 – The mapping scale problem.

When referring to the methods described in Section 4 above, it is also pertinent to comment that there are alternative systems employed, especially by the R.S.P.B. These methods of detailing the final transmission locations are significantly at variance with the M. A. routine as previously described.

For reasons (which confound the M.A.) the R.S.P.B. use two systems:

FIRST – an O.S. 1:250,000 – ‘Road Travel Map’ (scale: 1 centimetre to 2.5 kilometres – equivalent to 1 inch to 4 miles) and any final transmission location is only quoted as being within a 10 kilometre square – this is an O.S. two figure reference (Easting and Northing only) and is therefore within an area of 100 square kilometres which is 10,000 hectares (equivalent to 24,700 acres which is 38 square miles) the square having a hypotenuse of 14.14 kilometres equivalent to 8.78 miles.

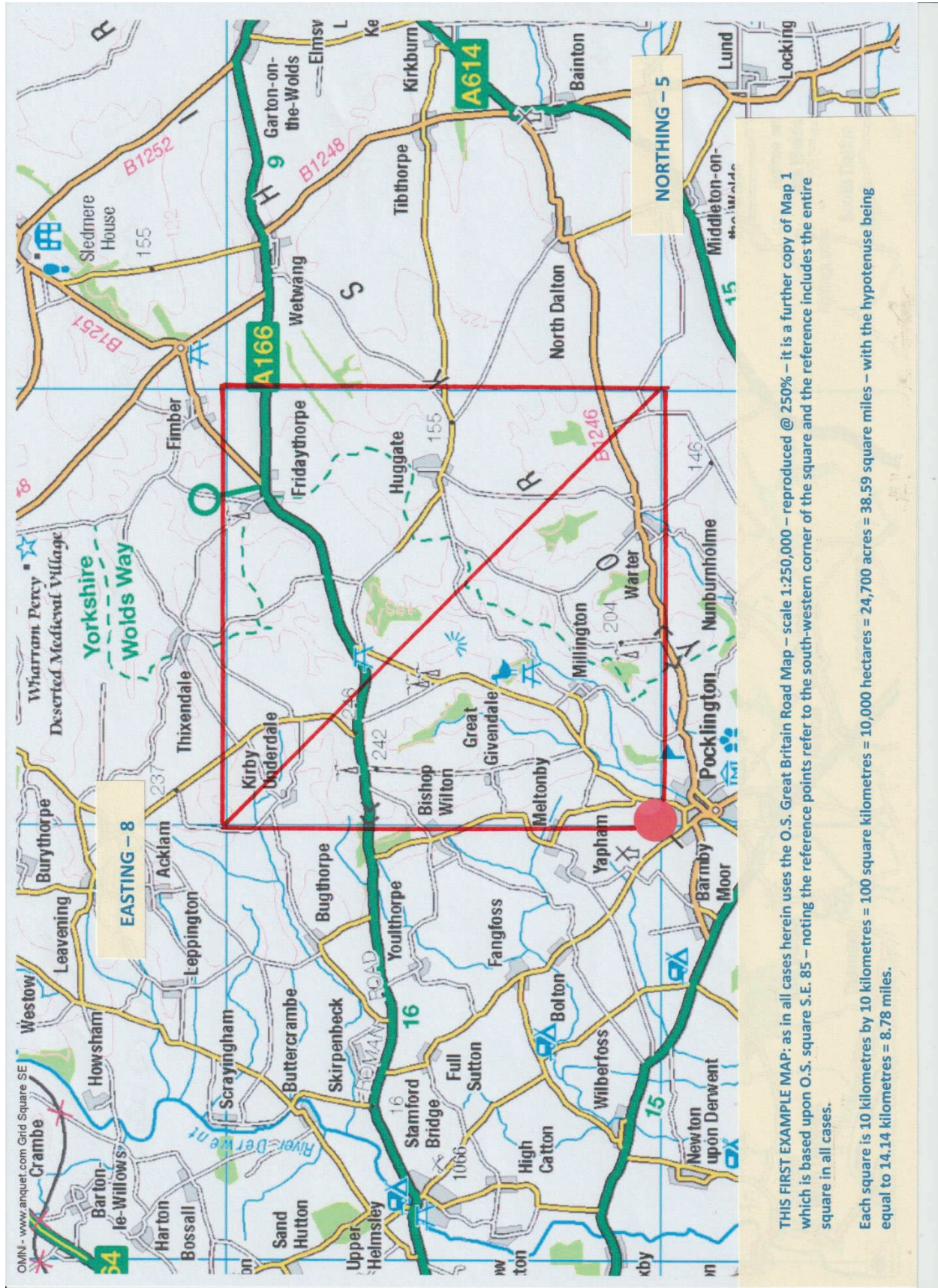
SECOND – again using an O.S. 1:250,000 – ‘Road Travel Map’ but this time with a 20 kilometre square which now covers an area of 400 square kilometres which is 40,000 hectares (equivalent to 98,842 acres which is 154 square miles) the square having a hypotenuse of 28.28 kilometres equivalent to 17.57 miles.

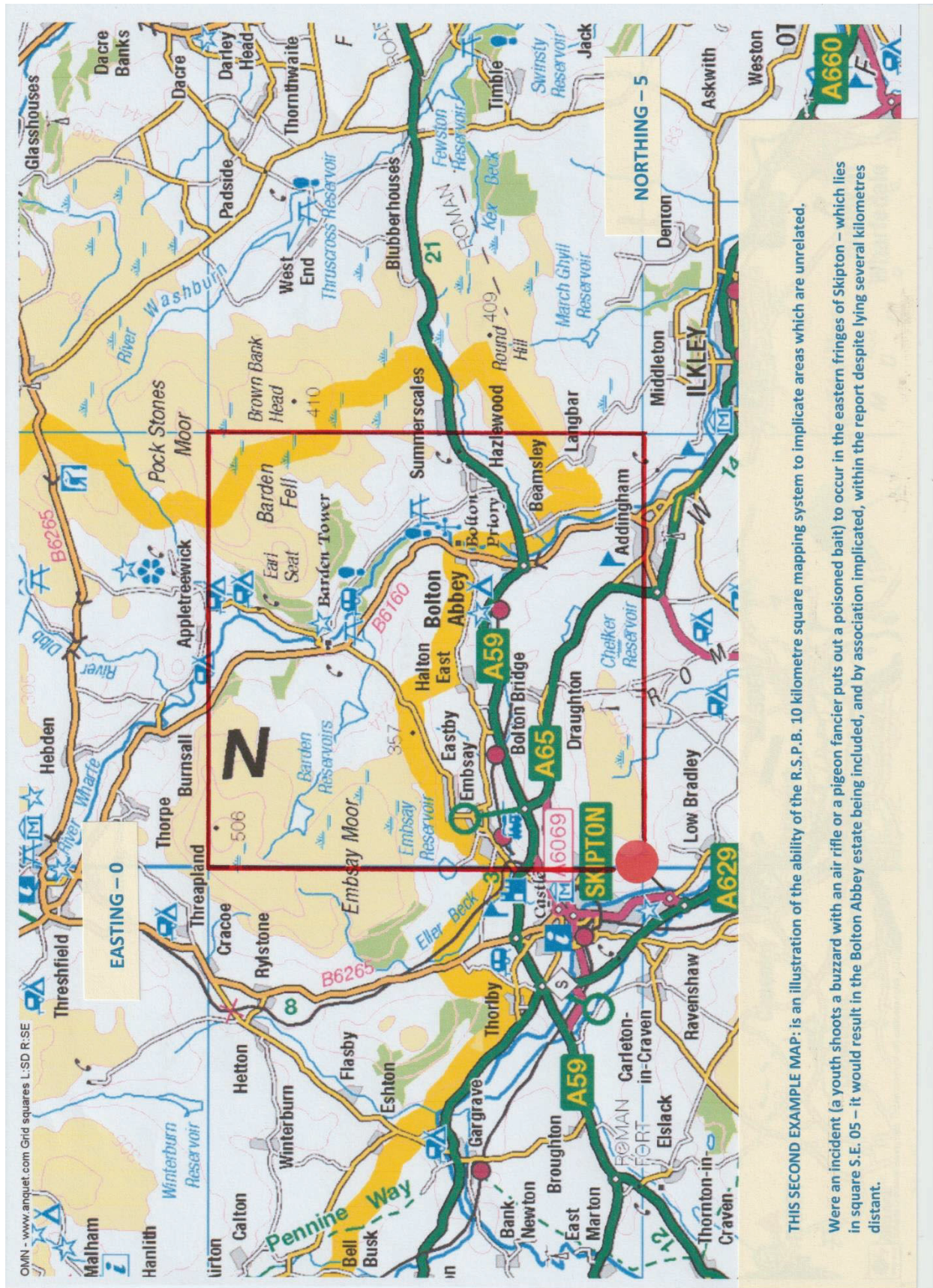
Neither system is of anything other than of general use – at 10 kilometres it is absurdly vague and at 20 kilometres simply useless.

Two illustrations follow (pages 10 and 11) demonstrating the 10 kilometre problem; there is no value in wasting further time with the 20 kilometre alternative.

Notice the first illustration – how wide an area is covered – an incident could be anywhere – potentially 8 plus miles from the reference point – in other situations such as emergency rescue this level of generality would be risible.

The second explains a further problem – say – an incident is recorded in eastern Skipton – this results in an entire estate being implicated despite being some kilometres distant. As such, it can be clearly appreciated that the only acceptable mapping scale is at O.S. six figure / 100 metre scale – nothing less will suffice.





Section 7 – M. A. final transmission location example maps.

The O.S. 1:50,000 – see page 13

In respect of an N.E. bird – named ‘BARNEY’ transmitter serial number # 34343 – tagged 24th August 2018 in Cumbria by N.E. – final transmission 1st November 2018 – east of the A30 – west of Colliford Reservoir – on Bodmin Moor – in Cornwall.

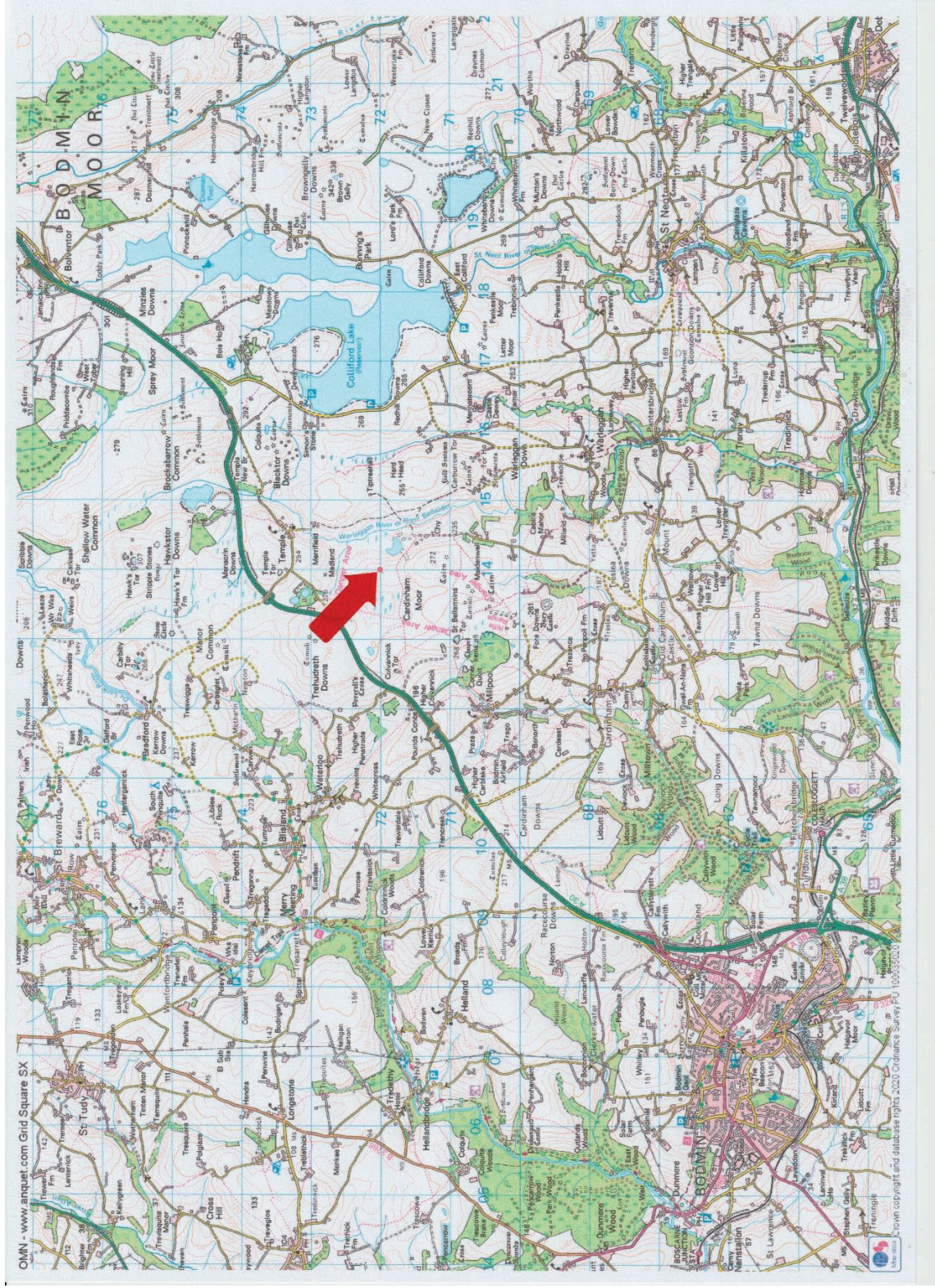
As can be seen, the general locational map is very useful in placing a location into a general context.

The O.S. 1:25,000 – see page 14

In respect once again of ‘BARNEY’ and illustrating very clearly how accurate a plot can be made at this scale. The location could be reached without a compass or G.P.S. as it is so well defined.

These two scales of map also serve to illustrate the point made in Section 5 above – with such detail the M.A. area / field liaison officers can identify and confirm use of the area with certainty.

1:50,000 – BODMIN MOOR



SECTION 8 – Examples of clusters in green status locations.

The clusters will of necessity have to be contained on O.S. 1:250,000 scale maps to encompass the various locations within the given area.

The KIELDER map – illustrates 5 final transmissions – all **GREEN** status – in respect of:

117313 'Grainne' / # 57266 'Alex' / # 213850 'Josephine' / #240290 'Cillian' / # 213932 (R2-M3-22)

NOTING: both O.S. 1:50,000 and 1:25,000 maps of the locations with further full tagging dates etc. can be supplied – in this case they are not included to save 10 pages.

The ISLE OF MAN map – illustrates 5 final transmissions – all **GREEN** status – in respect of:

240292 'Hazel' / # 33325 / # 33334 / # 33328 / # 33324

NOTING: The Isle of Man only has O.S. 1:50,000 mapping beyond the 1:250,000 map used here – the locations with further full tagging dates etc. can be supplied – in this case, once again, they are not included to save a further 5 pages.

Due to the shape of the Isle of Man, a landscape format has been used to allow for a full-size illustration.





SECTION 9 – EXAMPLES (12) OF WIDER FINAL LOCATIONS MAPPED.

Which represent a sample – all **GREEN** status – rather than a comprehensive listing, of varied final transmission locations.

161144 ‘TOM’ – St. Donat’s in the Vale of Glamorgan

55146 ‘JIMMY’ – Mulgrave Woods near Sandsend

57273 ‘TEDDY’ – the English Channel north of Caen, France

201123 ‘NED’ – Torresandino south of Burgos, Spain

201125 ‘INGERID’ – the Atlantic Ocean north of Coruna, Spain

201126(a) ‘LAGERTHA’ – Christchurch Bay near Bournemouth

201120 ‘MARTIN’ – the Atlantic Ocean between Ireland and Iceland

213852 ‘ETHEL’ – within the residential outskirts of Hexham

55147 (R1-M3-19) – the Atlantic Ocean south of Ireland

213919 (R1-F1-21) – the North Sea off Whitby

213925 (R3-M1-22) – Ferriby Sluice on the Humber Estuary

213927(a) (R2-M1-23) – Winsham near Braunton, Devon

M.A. – brood management 2024 – locational data resume for the Police – November 2024

Land App

Plans

New

Draw

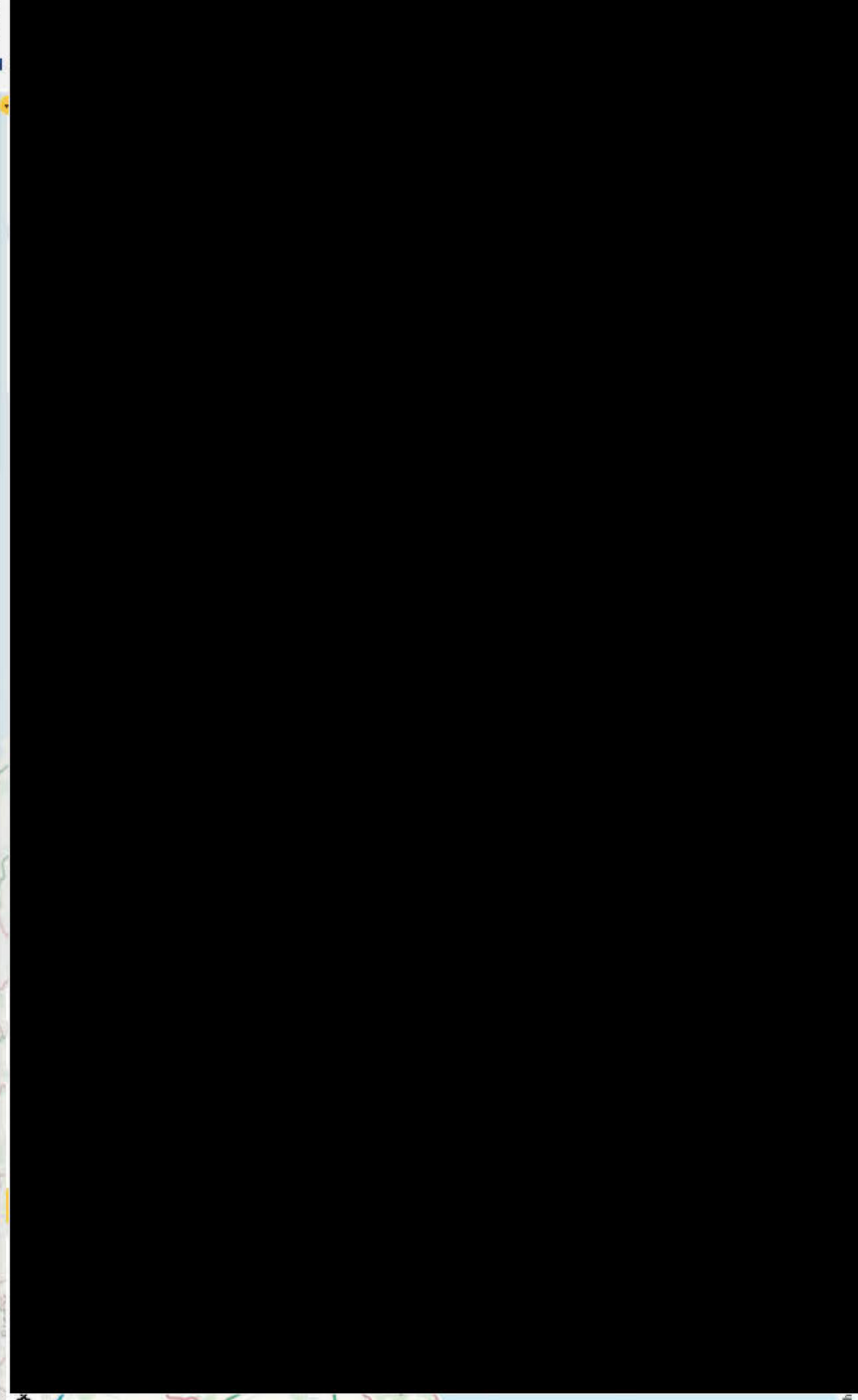
Map: SSSI

Saved 13 minutes ago

https://go.thelandapp.com/map

Upgrade

– shown with a 70km buffer



- with buffer = 17,931km²
- 90 x larger

Equates

Photos

Type here to search

20 km

This is Zoom Level 2 which

Record high

11:59

20/03/2023

Comparison of public and private NWCU communications

Below is our assessment of whether the National Wildlife Crime Unit's (NWCU) approach to grouse moor estates aligns with the College of Policing Code of Ethics and to highlight risks arising from differences between public narrative and private practice.

Context

- **Public Position:** DI Mark Harrison (NWCU) describes the Unit's work as collaborative, transparent and proportionate. Emphasising community engagement and trust. (see Appendix A)
- **Operational Practice:**
 - June 2024 letter to our members: explicitly labels the grouse moor estates a "hotspots of concern," requests consent for patrols/cameras, and warns of potential searches. (see Annex 4)
 - August 2025 email to our members: again identifies an estate as a "hotspot repeat location" for suspected hen harrier crimes; stresses missing satellite tags worth £100,000+ and links incidents to potential firearms use. (see Appendix B)
- **Issue:** While both communications are lawful, their tone and content diverge from the public messaging, raising concerns under the Code of Ethics. (see Appendix C)

Fairness

- *Public:* Estates are partners; hotspot mapping is framed as impartial.
- *Practice:* Estates are explicitly named as hotspots. Attribution stretches responsibility to incidents tens of km away.
- *Quote:* "A hotspot has been identified at XXXX Estate." (DC Irvine, 2025)
- *Risk:* Public identification risks reputational harm and perceived unfairness.

Accountability

- *Public:* Decisions are proportionate, with policing accountable to communities.
- *Practice:* Estates told hotspots are identified but not shown data in advance; permission forms and warnings of search powers presented without clear thresholds.
- *Quote:* "We will not be asking any questions about a specific incident and we are not assuming any involvement by anyone." (DC Irvine, 2025)
- *Risk:* Assurances of neutrality may be undermined by the accusatory framing of "repeat hotspot."

Transparency

- *Public:* Commitment to openness and trust-building.
- *Practice:* Estates receive conclusions (hotspot status, £100k tags lost, firearms involved) but not the methodology behind these findings.
- *Risk:* Without disclosure of data or criteria, transparency is partial.

Proportionality

- *Public:* Emphasis on prevention and collaboration.
- *Practice:* Language in both letters highlights high-value crimes and firearms, which raises the stakes but may feel disproportionate to estates who are told they are hotspots yet not accused directly.
- *Risk:* Approach risks being perceived as coercive rather than balanced.

Integrity

- *Public:* NWCUC projects trust and fairness.
- *Practice:* Tone towards estates mixes collaboration with implied responsibility.
- *Risk:* Discrepancy between public rhetoric and private correspondence undermines confidence in integrity.

Overall Assessment

- Public messaging aligns well with the Code of Ethics (fair, open, proportionate).
- Private correspondence demonstrates a harder-edged style: estates labelled as hotspots, reputational risk implied and requests framed alongside warnings.
- **The ethical concern lies in the gap between public commitments and operational practice, which risks damaging trust, cooperation and long-term effectiveness.**

Appendix A

NWCU communication with a Moorland Association member in August 2025

Subject: RE: test [OFFICIAL]

OFFICIAL

Good afternoon XXX

I am DC Steven Irvine from National wildlife crime unit. I have been provided your contact details as I understand XXX are the Land Agents for [estate name] on behalf of [owner name].

The reason for me contacting you is to try and arrange a meeting with you as Land Agent along with other representatives of [estate name], the NWCU and a representative police officer from Northumbria police to discuss data that the NWCU have analysed from satellite tagged hen harriers and identified [estate name] as a hotspot repeat location where we suspect crimes involving satellite tagged Hen Harriers have occurred.

Since 2021 the number of crimes involving tagged hen harriers has increased across the north of England. Most of these tags have also gone missing, and we suspect that in some cases they have been stolen to hide the fact that a bird has been shot. The average tag costs £2800 and since 2021 over £100,000 worth of tags have gone missing in suspicious circumstances in the North of England.

From birds that have been recovered we know that firearms have been used during these crimes, so we have high value crimes involving firearms having occurred across the North of England. These crimes are either being committed by people who legally have access to the land, or by people trespassing with firearms onto private land and committing crimes.

A hotspot has been identified at [estate name].

The aim of the meeting is to show our data to the landowners, land agents, land managers, and users within the hotspot area to highlight the issue to them and to ask them to work with us to tackle the issues we have identified. We will not be asking any questions about a specific incident, and we are not assuming any involvement by anyone.

Looking at diaries from our side, we have the following dates currently available [three dates].

I would be grateful if you could discuss the content of this email with [estate name] and hopefully one of the above dates would be suitable. In terms of the time of day, we would be happy to fit in with your working schedule to allow travel etc.

If you have any further questions, then please get in touch.

Yours sincerely

Steven

Steven Irvine

Detective Constable

UK National Wildlife Crime Unit

(+44) xxxxxxxxxxxxxx

www.nwcu.police.uk

NWCU public communication in January 2025

<https://www.henharrierday.uk/news/in-conversation-with-detective-inspector-mark-harrison-of-the-national-wildlife-crime-unit/>

DI Mark Harrison manages and supervises five Investigation Support Officers (ISOs) and two Detective Constables (DCs) within the nineteen-strong team that makes up the [National Wildlife Crime Unit](#) (NWCU), covering the whole of the UK.

The NWCU's role is vital in tackling wildlife crime, and they work closely with front line police officers across the UK, often within rural crime teams. Their work is a mix of training, supporting and advising wildlife crime officers on the ground and identifying current and emerging threats to UK wildlife. The unit also comprises an indexer, two intelligence officers, three analysts and two training officers, along with the five ISOs and two DCs in Mark's team.

Mark has been with the NWCU for over two years now, joining from a role in the North West Regional Organised Crime Unit. He sits on various international wildlife crime groups, coaches mixed martial arts and is a qualified drone pilot.

We caught up with Mark recently to find out more about how he and his colleagues are tackling wildlife crime, and the innovative techniques they are deploying on the front line.

HHA: Tell us a bit about the NWCU and your role, Mark.

The NWCU is a small policing unit of 19 staff that supports front line police officers dealing with wildlife crime, and we cover the whole of the UK. Our role is varied and split across training, supporting, and advising wildlife crime officers on the ground through to identifying current and emerging threats to wildlife.

There are very few full-time Wildlife Crime Officers (WCOs). The vast majority are front line police officers with a personal passion for wildlife who volunteer for the training and do the role on top of their normal day job. Most of these officers work within rural crime teams.

Historically we focused on threats to certain species or from a particular crime type such as raptor persecution or poaching, and these threats were prioritised to help us focus resources and be more efficient and effective. Each of these priorities has a Priority Delivery Group (PDG) which is made up from relevant stakeholders and their job is to develop and implement a 4 P plan for delivering results – Pursue, Prepare, Protect and Prevent.

More recently, we have started to identify organised crime groups (OCGs) who participate in wildlife crime and other key nominals of interest. We develop intelligence, map and score these OCGs, recording them on the National Crime Agency system. It means we are identifying the biggest risks and targeting them whilst raising the profile of wildlife crime at a national level.

My role within all of this is to manage and supervise my team in their daily workload and to focus on the greatest risks. I want my ISOs and DCs to be the elite team in UK wildlife crime. Not only do they have specialist skills and knowledge relating to wildlife crime, but they are also trained in aspects of surveillance, covert tactics, financial crime, intelligence development and drone operation.

In practice this means that we may be helping a police officer with a disturbed badger set one day and the next day we could be identifying an OCG, developing intelligence using various overt and covert tactics and collaborating with partners and the local police to target, disrupt and dismantle that OCG.

Appendix B

HHA: Can you tell us a bit about your working day, Mark?

It can vary a lot. Just like all other police officers I don't know what is going to come in from day to day and we have to adapt and respond, but my sole focus is wildlife crime. I love driving our operations and projects forward.

I am involved in national and international criminal investigations and projects, and I am regularly traveling in support of those, doing everything from requesting support and assistance and delivering presentations through to operational deployments. We're a small team and I try to play my part operationally both to keep my hand in but also to help the team and share the load.

HHA: The NWCU hit the headlines recently for breaking an international criminal network of egg thieves. What other NWCU successes gave you most satisfaction in 2024?

The whole team has done some amazing work this year. Personally, the launch of the [Hen Harrier Task Force](#) last year, targeting hotspots for suspected crimes involving Hen Harriers, has been both a challenge and given me great satisfaction.

I can't talk about some of our work because of the sensitive nature of ongoing investigations, but one of the highlights of the year that for me was the successful outcomes from Operation Tantallon, a multi-agency investigation into the [theft and laundering of wild peregrines in Scotland](#) and Northern England that led to numerous prosecutions and proceeds of crime results.

I am also excited about the development of wildlife crime detection dogs, working in partnership with [Conservation K9 Consultancy](#). A recent study showed that dogs can locate bird carcasses over 90% more effectively than a human, a huge advantage on remote locations.

And I am encouraged by how some of our relationships with partners here in the UK and internationally have developed with regard to more covert policing tactics.

HHA: What prompted the launch of the Hen Harrier Task Force initiative last year, and what progress has been made so far?

When I joined the NWCU I was tasked with looking at Raptor Persecution, or Bird of Prey Crime as it is now called. Initially I took the time to review what the general issues were and then to assess what could be done about it.

I have several areas that I would like to tackle, but I saw an opportunity with satellite tagged birds and Hen Harriers in particular.

Hen Harriers are beautiful, rare, iconic birds of prey, and a lot of them are satellite tagged. Plus, there are a vast number of academic papers, reports, books, articles, and media which clearly identify what the issues are and why the crime is taking place. This is a human-wildlife conflict issue. It's not the mainstream conflict that most people think of, such as elephants destroying crops, but it is 100% human-wildlife conflict. I believed from the outset that we could resolve this, and I still do.

Looking at the data from satellite tagged Hen Harriers through a law enforcement lens and cross-referencing this with police data, land registry data and other information, it was clear that we needed to do a number of things:

- Map suspected crimes involving Hen Harriers using police data and identify hotspots with the greatest threat, harm, and risks.
- Take positive proactive steps to address those risks, prevent crime and protect the birds.
- Increase the consequences for those committing crimes involving Hen Harriers.

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- Quickly find out when a suspected crime had occurred.
- Improve the police response and make sure that the police had primacy in the investigation.
- Increase our chances of gathering best evidence.
- Ensure the best evidence is available to the court if required.
- Work with all stakeholders to find, agree on, and implement long term solutions so that they can coexist with Hen Harriers.

"Stop the crime before it happens as opposed to chasing it afterwards"

At the time I was inspired by an ex-colleague I knew from Merseyside Police. Now retired, DCS Mark Baker had been the SIO into the murder of nine-year-old Olivia Pratt-Korbel, and as part of that investigation he had used a model called Clear, Hold, Build. This model is essentially a three-step plan which sees the criminals cleared from an area through relentless pursuit activity. The area is then held and stabilised through high visibility, assistance from partners and the community. Then with the support from key stakeholders, communities can build in long term solutions that are crime-free and they can police themselves.

I believed that this model could be followed for the HTF. Stop the crime, then hold whilst we build together for the future. Wildlife crime is unique, and for bird of prey crime in particular, it is hard to gather enough evidence to reach a successful prosecution. So, the best way to stop the crime was to focus on the greatest threats and be proactive there. Stop the crime before it happens as opposed to chasing it afterwards.

HHA: So what did you do?

We created new practices, standard operating procedures and standardised reporting methods to ensure consistent reporting and response. We established a mutual aid agreement with the relevant police forces so that there was always a police officer available to attend a suspected crime.

To help the local police the NWCU is now on call to do the initial analysis of any tag data and relevant intelligence for any missing Hen Harriers. This means we can quickly identify any suspicious circumstances and launch the appropriate response. We are very critical when analysing the data. We know that we must maintain credibility and unfortunately a lot of young Hen Harriers do die of natural causes in their first year. We take everything into consideration so that we have confidence our assessment.

We developed new techniques for analysing tag data and mapped the hotspots – repeat locations for suspected crimes involving Hen Harriers. Then we identified who owned that land and, if there were no current live investigations, my team, the local police, and I went to visit them. I wanted the landowner to know what was occurring on their land and what the risks are. We presented them with the information and data we had and shared our working hypotheses.

Either someone who has legal access to this land who is committing these crimes or it is a trespasser coming onto their land (probably with a firearm because that is how most Hen Harriers are killed) and committing crimes (this second one poses the greatest risk to the landowner, their staff and the public).

"We have developed new drones with tag tracking capability and wildlife detection dogs"

And we asked them to work with us to find out what was going on, to end the criminal activity and to protect the people, wildlife and businesses involved.

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We asked for permission to do high-visibility patrols, to install cameras and use other crime prevention techniques that are quite common for hotspot areas (this would also help with any other crime they were experiencing or reporting). We are maintaining contact with these landowners and land users to provide updates, offer support and to act if required.

We changed the focus from purely wildlife crime to include crimes like theft and criminal damage to the tags, and potentially other offences like fraud and encouraging or assisting an offence. This increases the consequences for a criminal, and it could also provide the police with access to different policing tactics. A lot of these other offences are also notifiable, something that most wildlife crimes are not. The notifiable crimes push up crime figures and have a wider social, economic, and political impact.

We are using publicity to raise awareness. We took North Yorkshire's brilliant Operation Owl and made it a national project which we now lead on. And we have developed new drones with tag tracking capability and wildlife detection dogs to help us recover best evidence.

We are applying for funding from DEFRA to use the IUCN Human-Wildlife Conflict and Coexistence Guidelines as a tool for building for the future. This funding will bring in independent facilitators to collaborate with key stakeholders to find and implement long term solutions. We hope that this funding will be for three years.

HHA: How is this new approach being received by landowners?

As you would expect, there was some debate from landowners regarding our data and the fact that we were calling them a hotspot for Hen Harrier crime. But I stand by our data. We did listen to them and their concerns about the implications of being identified as a hotspot especially in the media and they flagged up some safeguarding concerns and other impacts that they could encounter.

So, I decided that we would not make their exact locations or identity known to the public. This would hopefully prevent any of the consequences and safeguarding issues that they had highlighted, and it would be an opportunity for us to start building trust and respect.

We started our visits early in 2024 and since then there has not been a single suspected incident involving a tagged Hen Harrier in any of the hotspot locations.

I should say that we are supported in all this work by the relevant police forces, Natural England (NE), the Wildlife Trusts, British Association of Shooting and Conservation (BASC), Countryside Land and Business Association (CLA), National Gamekeepers Organisation (NGO), the National Parks and the RSPB. We would not have been able to do this work without them.

"We just need the right people coming together in the right way to do the right thing"

HHA: What are the challenges you are facing now?

My team and I have been on a journey with the Hen Harrier Task Force, and I believe that it should keep evolving and adapting to make it better. I always listen to good ideas and feedback, and it is not a case of forcing this on people and make them adhere to it. I know that no one organisation or community can fix this alone. We must work together to resolve it. But we must do that with a foundation of honesty and openness. If the crime continues then those foundations are flawed and there will be no trust or respect.

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I have said it before, there is a lot of noise around this issue. Organisations and people pushing their own agenda, twisting what is being said or done and shouting about who they're supporting and what they are doing. Unfortunately, there is misinformation being shared which is making the matter worse by confusing and scaring people.

At times you can't move forward to resolve an issue because people are arguing about the dictionary definition of a word that someone has said. You can come out of a presentation or meeting worried that you have upset someone by accidentally saying the wrong word. On both sides of this debate there must be better coexistence.

We don't need to convince everyone to talk or act the same way. We just need the right people coming together in the right way to do the right thing. There are a lot of good people caught up in the middle of all this and along with the birds it is these people and their livelihoods that are being affected the most.

HHA: You mentioned some innovative ideas to improve evidence recovery and investigation. Which look most promising?

The new tag tracking drone that James Leonard from my team has developed with the RSPB is very exciting, as it has removed the issues caused by the terrain when trying to track and locate a device at ground level.

And we are improving our ballistic evidence capabilities too. I'll soon be sharing some work that has been done on a recovered damaged satellite tag that can evidence that it was shot with a shotgun. We worked on this in collaboration with ZSL, Nottingham University, ballistics experts in Police Scotland and the local police. We are really trying to push the boundaries with these approaches and it's amazing to see the results these experts can deliver.

And of course, I'm excited about the potential for wildlife crime detection dogs.

"We have tested the dogs on several deployments now and they have been really useful, even locating carcasses buried several inches underground"

HHA: Tell us more about the work with detection dogs.

This is one of the most exciting areas of development for wildlife crime in the UK. Initially I tried to create a network made up of police dogs, but that was not possible due to conflicting priorities and resources so I explored the private sector. The private sector already supports the police with things like expo dogs and there is a thriving sector for environmental detection dogs. I wanted to see if we could use them.

I met several organisations before concluding that the best potential partner was Conservation K9 Consultancy (CK9C), a well-established specialist in the field of detection dog training.

Louise Wilson at CK9C already had several detection dogs that could find things like bird and bat carcasses, great crested newts and water voles, so it wasn't a huge leap to take those skills over to crime detection. What Louise has now done is train dogs to find satellite tags and other devices, and she is exploring using the dogs specifically to find Hen Harriers and anything that they come into contact with, including the perpetrator. We hope this will have a major impact on our searches and help with all Hen Harriers, tagged or not.

We have tested the dogs on several deployments now and they have been really useful, even locating carcasses buried several inches underground. Combined with metal detectors, we can

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locate the tags too. But the NWCU has to fund the dog deployments so we are limited in what we can do.

HHA: Finally, what will be the priorities for 2025? Are you optimistic about reducing wildlife crime in the UK?

The NWCU has just come to the end of its last strategic threat assessment, and we will be launching our new priorities early in 2025. I can't say too much about that at the minute, but I am excited about it and the directions we could go in.

Birds of prey and illegal wildlife trade will still be a priority for us, and these are areas where I want to start using more varied and covert tactics. I want us to become even more proactive and prevent the loss of any more precious UK wildlife.

We will continue with the Hen Harrier Task Force and maintain contact with the hotspots. We will identify new ones as they emerge and take the same approach with them.

I am hopeful that we will get the DEFRA funding to start the Build phase, creating crime-free communities that are self-policing.

And we will keep attempting to deter criminals and prevent crimes from occurring and continue to improve evidence recovery.

We have an innovation and technology project where we are engaging with academia, industry, law enforcement and other partners to push the boundaries of evidence and intelligence gathering.

There is a lot to do for UK wildlife, but reducing wildlife crime would have a major impact. It is still a challenge.

Yes, I am optimistic. I love my job and look forward to achieving every goal.

Appendix C

Comparison of private and public NWCU communications

Communication extract	Breached principles	Why it Matters
“[estate name] identified as a hotspot repeat location where we suspect crimes involving satellite tagged Hen Harriers have occurred.”	Code of Ethics: Honesty, Objectivity, Fairness. NPCC Strategy: Evidence-based communication; Conflict reduction.	Labels a specific estate as a “crime hotspot” without published evidence or criteria. This risks unfairly stigmatising the estate, undermining impartial policing, and escalating hostility in local communities. Neutral communication is replaced by accusatory language, damaging trust and partnership.
“Since 2021 the number of crimes involving tagged hen harriers has increased across the north of England. Most of these tags have also gone missing, and we suspect... they have been stolen... we know that firearms have been used during these crimes.”	Code of Ethics: Integrity, Transparency, Accountability. NPCC Strategy: Transparency & accountability; Protection & prevention.	Conflates suspicion with fact. By presenting unverified assumptions alongside confirmed incidents, the message implies certainty about widespread criminality without evidence. This blurs fact and speculation, prevents proper scrutiny, and damages the credibility of police communication.
“A hotspot has been identified at [estate name].”	Code of Ethics: Respect, Fairness, Proportionality. NPCC Strategy: Fairness & consistency; Partnership working.	Singling out one estate as a “hotspot” contradicts the stated claim of neutrality. This creates the perception of bias, undermines fairness, and discourages estate cooperation. It also contradicts the NPCC commitment to engage the broadest range of partners in a constructive way.
“Over £100,000 worth of tags have gone missing in suspicious circumstances... high value crimes involving firearms having occurred across the North of England.”	Code of Ethics: Proportionality, Objectivity. NPCC Strategy: Evidence-based communication; Governance & scrutiny.	Citing national-level figures in a communication about one estate exaggerates local responsibility and creates a disproportionate impression of risk. This approach lacks proportionality and accountability, leading to unfair attribution of blame and undermining confidence in police neutrality.
“These crimes are either being committed by people who legally have access to the land, or by	Code of Ethics: Honesty, Objectivity, Fairness.	Suggests only two possibilities (landowners/agents or trespassers) without evidence, creating a false dichotomy. This fuels suspicion

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Communication extract	Breached principles	Why it Matters
people trespassing with firearms onto private land.”	NPCC Strategy: Protection & prevention; Partnerships.	towards estate staff and lawful land users, heightening tension and eroding trust in partnership working.
“We are not assuming any involvement by anyone.”	Code of Ethics: Integrity, Respect. NPCC Strategy: Partnership building: Conflict reduction.	This statement is inconsistent with the earlier labelling of [estate name] as a “hotspot.” Contradictory messaging undermines integrity, creates confusion, and conveys mixed signals. It is damaging the credibility of police communication and worsening community mistrust.

Overall Assessment

This NWCUCU communication demonstrates, a year after raising concerns, that several systemic issues remain:

- **Inflammatory terminology** (“hotspot”, “high value crimes”) escalates conflict rather than reducing it.
- **Mixing suspicion and fact** breaches transparency and weakens evidence-led policing.
- **Disproportionality** unfairly attributes national or regional statistics to a specific estate.
- **Contradictory neutrality** damages trust and shows inconsistency with the Code of Ethics.
- **Failure to follow IUCN conflict-avoidance guidance** risks worsening relations between police and rural communities.

Conclusion: We feel the communication style in this email is not consistent with the ethical principles or strategic commitments of UK policing. It undermines trust, fairness and proportionality. It risks inflaming rather than resolving the very conflict the RPDG was created to address.