

**IN THE HIGH COURT OF JUSTICE
KING'S BENCH DIVISION**

Before: [Mr/Mrs Justice]

On: 26 April 2024

BETWEEN:

NATIONAL HIGHWAYS LIMITED

Claimant

- and -

**(1) PERSONS UNKNOWN CAUSING THE BLOCKING OF, ENDANGERING,
OR PREVENTING THE FREE FLOW OF TRAFFIC ON THE M25
MOTORWAY, A2 A20 AND A2070 TRUNK ROADS AND M2 AND M20
MOTORWAY, A1(M), A3, A12, A13, A21, A23, A30, A414 AND A3113 TRUNK
ROADS AND THE M1, M3, M4, M4 SPUR, M11, M26, M23 AND M40
MOTORWAYS FOR THE PURPOSE OF PROTESTING
(2) MX CATHERINE RENNIE - NASH AND 9 OTHERS**

Defendants

DRAFT ORDER

PENAL NOTICE

**IF YOU THE WITHIN NAMED DEFENDANTS OR ANY OF YOU DISOBEY THIS ORDER
YOU MAY BE HELD TO BE IN CONTEMPT OF COURT AND MAY BE IMPRISONED,
FINED OR HAVE YOUR ASSETS SEIZED.**

IMPORTANT NOTICE TO THE DEFENDANTS

This Order prohibits you from doing the acts set out in this Order. You should read it very carefully. You are advised to consult a solicitor as soon as possible. You have the right to ask the Court to vary or discharge this Order.

A Defendant who is an individual who is ordered not to do something must not do it himself/herself/themselves or in any other way. He/she/they must not do it through others acting on his/her/their behalf or on his/her/their instructions or with his/her/their encouragement.

FURTHER TO the Order made by Mr Justice Cotter dated 5 May 2023 (“**Original Cotter Order**”) (as amended by Mr Justice Cotter by further Orders dated 24 July 2023 (“**July 2023 Order**”) and 3 October 2023 (“**October 2023 Order**”) (“**Consequential Orders**”) together “**the Cotter Injunction**”)

AND UPON the Claimant’s application by Application Notice dated 27 March 2024

AND UPON the Claimant re-confirming that this Order is not intended to prohibit lawful protest which does not block or endanger, or prevent the free flow of traffic on the Roads defined in paragraph 1 of this Order

AND UPON the Police Representative Assistant Chief Constable Owen Weatherill consenting to the Third Party Disclosure provisions at paragraph 10 of this Order on behalf of all the Chief Constables for those forces listed in Schedule 2 to this Order, which consent has been evidenced to the Court

AND UPON HEARING Counsel for the Claimant, [Counsel for the Defendants] [the Defendants in person [and various non-Defendants in person]] at a hearing on 26 April 2024 (“**Review Hearing**”) and also after consideration of submissions lodged by or on behalf of the Claimant [and Defendants]

IT IS ORDERED THAT:

Definitions

1. In this Order, the following defined terms shall apply:
 - a. “**Named Defendants**” means D14, D50, D52, D53, D54, D93, D100, D101, D104, D136, whose names appear in Schedule 1 annexed to this Order.
 - b. “**Defendants**” means all defendants.
 - c. “**the Roads**” shall mean all of the following:
 - i. The M25, meaning the London Orbital Motorway and shown in red on the plans at Appendix 1 annexed to this Order.
 - ii. The A2, A20, A2070, M2 and M20, meaning the roads shown in blue and green on the plans at Appendix 2 annexed to this Order.
 - iii. The A1(M) (Junction 1 to Junction 6), A1 (from A1M to Rowley Lane and from Fiveways Corner roundabout to Hilltop Gardens), M11 (Junction 4 to Junction 7), A12 (M25 Junction 28 to A12 Junction 12), A1023 (Brook Street) (from M25 Junction 28 roundabout to Brook Street Shell Petrol Station access),

A13 (M25 Junction 30 to A1089), A13 (from junction with A1306 for Wennington to M25 Junction 30), A1089 (from junction with A13 to Port of Tilbury entrance), M26 (whole motorway from M25 to M20), A21 (M25 to B2042), A23 (M23 to Star Shaw), M23 (Junction 7 to Junction 10 (including M23 Gatwick Spur)), A23 (between North and South Terminal Roundabouts), A3 (A309 to B2039 Ripley Junction), M3 (Junction 1 to Junction 4), A316 (from M3 Junction 1 to Felthamhill Brook), A30 (M25 Junction 13 to Harrow Road, Stanwell, Feltham), A3113 (M25 Junction 14 to A3044), M4 (Junction 1 to Junction 7), M4 Spur (whole of spur from M4 Junction 4 to M4 Junction 4a), M40 (Junction 7 to A40 at Fray's River Bridge), M1 (Junction 1 to Junction 8), A405 (from M25 Junction 21A to M1 Junction 6), A1 (from Fiveways Corner roundabout to Hilltop Gardens), and A414 (M1 Junction 8 to A405), meaning the roads shown in red on the plan at Appendix 3 annexed to this Order.

- iv. In the case of each of the Roads, the reference to the Roads shall include all carriageways, hard shoulders, central reservations, motorway (including the A1(M)) verges, slip roads, roundabouts (including those at junctions providing access to and from the Roads), gantries, traffic tunnels, traffic bridges including in the case of the M25 the Dartford Crossing and Queen Elizabeth II Bridge and other highway structures whether over, under or adjacent to the motorway/trunk road, together with all supporting infrastructure including all fences and barriers, road traffic signs, road traffic signals, road lighting, communications installations, technology systems, laybys, police observation points/park up points, and emergency refuge areas.

- d. **“Injunction Website”** means the page on the National Highways website which holds the information as to injunctions in force, which is presently at: <https://nationalhighways.co.uk/about-us/high-court-injunctions-for-motorways-and-major-a-roads/>.

Variations/ Amendments

2. The Claimant has permission to amend the Schedule of Defendants in the form set out at Schedule 1. Those amendments are as follows:

- a. Removal of all Named Defendants from the Cotter Order, namely: D14, D50, D52, D53, D54, D93, D100, D101, D104, D136 such that there are now no Named Defendants to the Cotter Injunction
- b. The substitution of the following revised wording to the Schedule of Defendants being a revision of paragraph 2 (c) of the Previous Order: “*For the avoidance of doubt, any person who has previously been a named defendant in these proceedings in the Cotter Injunction, or who has given undertakings to the Court in these proceedings, may nevertheless become Defendant 1 as a person unknown if they commit any of the prohibited acts.*”

Injunction in force

3. With immediate effect and until 23.59 hrs on 10 May 2026 the Defendants and each of them are forbidden from:
 - a. Blocking or endangering, or preventing the free flow of traffic on the Roads for the purposes of protesting by any means including their presence on the Roads, or affixing themselves to the Roads or any object or person, abandoning any object, erecting any structure on the Roads or otherwise causing, assisting, facilitating or encouraging any of those matters.
 - b. Causing damage to the surface of or to any apparatus on or around the Roads including by painting, damaging by fire, or affixing any structure thereto.
 - c. Entering on foot those parts of the Roads which are not authorised for access on foot, other than in cases of emergency.

Service by Alternative Method on the First Defendant

4. The Court will provide sealed copies of this Order to the Claimant’s solicitors for service (whose details are set out below).
5. Pursuant to CPR r. 6.15, 6.27 and r.81.4:
 - a. The Claimant shall serve this Order upon D1 by:
 - i. Posting a direct link to this Order on the National Highways Injunctions Website at: <https://nationalhighways.co.uk/about-us/high-court-injunctions-for-motorways-and-major-a-roads/m25-high-court-injunction-proceedings/>

- ii. Sending a notification of the existence of this Order to the Press Association and in particular advertising the web address of the Injunction Website and a direct link to this Order.
- iii. Publishing social media posts on the National Highways Twitter and Facebook platforms advertising the existence of this Order and providing a link to the Injunction Website.
- iv. Emailing a copy of this Order to:
 1. juststopoil@protonmail.com
 2. juststopoilpress@protonmail.com
 3. insulatebritainlegal@protonmail.com
 4. Ring2021@protonmail.com
 5. actions@animalrebellion.org
 6. fundraising@animalrebellion.org
 7. integration@animalrebellion.org
 8. talks@animalrebellion.org
 9. global@animalrebellion.org
 10. localgroups@animalrebellion.org
 11. media@animalrebellion.org
 12. governance@animalrebellion.org
 13. pressoffice@animalrebellion.org
 14. finance@animalrebellion.org
 15. techsupport@animalrebellion.org
 16. info@animalrising.org

6. Service in accordance with paragraph 5 above shall:

- a. Be verified by certificates of service to be filed with the Court;
- b. Be deemed effective as at the date of service specified by the certificates of service;
- c. Be good and sufficient service of this Order on D1 and each of them and the need for personal service is dispensed with.

Service by Alternative Method on Named Defendants removed from the Cotter Injunction by paragraph 2(a) of this Order

7. Pursuant to CPR r. 6.15, 6.27 and r.81.4, the Claimant is permitted in addition to personal service, where practicable, to serve this Order on each Named Defendant by:
 - a. Placing this Order on the Injunction Website; and
 - b. Electronic means: where a Named Defendant has provided an email address to the Claimant, the Claimant shall serve that Named Defendant with this Order by sending this Order by email to that email address. If necessary due to the size of this Order, the appendices may be served by emailing that Named Defendant with a secure link to a file-sharing platform which hosts the appendices. It is open to any Defendant to contact the Claimant to require postal service instead of electronic means; or
 - c. Post: by posting a copy of this Order through the letterbox of each Named Defendant (or leaving in a separate mailbox) at their last known address, with a notice drawing the recipient's attention to the fact the package contains a Court Order. If the address does not have a letterbox, or mailbox, a package containing this Order may be affixed to or left at the front door or other prominent feature marked with a notice drawing the recipient's attention to the fact that the package contains a court order and should be read urgently. The notices shall be given in prominent lettering in the form set out in Appendix 4. It is open to any Defendant to contact the Claimant to identify an alternative place for service and, if they do so, it is not necessary for a notice or package to be affixed to or left at the front door or other prominent feature; or
 - d. Social media: only in circumstances where the Claimant has no address, or no email address for a Named Defendant, but is aware of that Named Defendant having a social media account which will permit the Claimant to contact that Named Defendant directly, the Claimant may serve this Order by sending a message to that Named Defendant providing either this Order or a link to the Injunction Website.
 - e. Where a Named Defendant is known by the Claimant to be in prison this Order shall be served by sending it by first class and/or special delivery post to the Named Defendant at the prison in which the Claimant reasonably considers they are being held.
8. Service in accordance with paragraph 7 above shall:
 - a. be verified by certificates of service to be filed with Court;

- b. be deemed effective as at the date specified by the certificates of service; and
 - c. be good and sufficient service of this Order on the Defendants and each of them and the need for personal service be dispensed with.
9. Further, without prejudice to paragraphs 7 and 8, whilst this Order is in force, the Claimant shall take all reasonably practicable steps to effect personal service of the Order upon any Defendant of whom it becomes aware is, or has been, on the Roads for the purposes of protesting and shall verify any such service with further certificates of service (where possible if persons unknown can be identified) to be filed with Court.

Third-Party Disclosure

10. Pursuant to CPR 31.17, the Chief Constables for those forces listed in Schedule 2 to this Order shall procure that the officers within their forces disclose to the Claimant:
- a. all of the names and addresses of any person who has been arrested by one of their officers in the course of, or as a result of, protests on the Roads referred to in these proceedings; and
 - b. all arrest notes, body camera footage and/or all other photographic material relating to possible breaches of this Order.
11. Without the permission of the Court, the Claimant shall not make use of any document disclosed by virtue of paragraph 10 of this Order, other than for one or more of the following uses:
- a. applying to name and join any person as a Named Defendant to these proceedings and to serve the said person with any document in these proceedings;
 - b. investigating, formulating, pleading and prosecuting any claim within these proceedings arising out of any alleged breach of this Order;
 - c. use for purposes of formulating, pleading and prosecuting any application for committal for contempt of court against any person for breach of any Order made within these proceedings.
12. The Chief Constables listed in Schedule 2 to this Order shall procure that the officers within their forces give the relevant person whose details are to be provided to the Claimant pursuant to paragraph 10 of this Order not less than 48 hours' notice that disclosure will be given under paragraph 10 of this Order and supply a copy of this Order or refer to an e-mail address/website

or phone number provided by the Claimant to enable this Order to be provided/available for consideration.

13. Until further Order, the postal address and/or address for service of any person who is added as a Named Defendant to these proceedings shall be redacted in any copy of any document which is served other than by means of it being sent directly to that person or their legal representative.
14. The Claimant is to serve this order on the Police Representative Assistant Chief Constable Owen Weatherill (owen.weatherill@npocc.police.uk), by email only by way of service upon the Chief Constables of all of the forces listed in Schedule 2 to this Order.

Further Directions

15. This Order will be reconsidered at a hearing to be listed by the Court in April 2026 on a half day estimate at the Royal Courts of Justice, London to determine whether there is a continued threat which justifies continuation of this Order beyond 23.59 hrs on 24 May 2026. It will be the Claimant's responsibility to arrange such a hearing and to place details of any such hearing on the Injunction Website. No further application shall be required, and the Court will issue a notice of hearing on notification by the Claimant.
16. The Defendants or any other person affected by this Order may apply to the Court at any time to vary or discharge it but if they wish to do so they must inform the Claimant's solicitors by email to the addresses specified at paragraph 20 below 48 hours before making such application of the nature of such application and the basis for it.
17. Any person applying to vary or discharge this Order must provide their full name and address, and address for service to the Claimant and to the Court and must also apply to be joined as a Named Defendant to these proceedings at the same time.
18. The Claimant has liberty to apply to extend, vary or discharge this Order, or for further directions.

Costs

19. There be no order as to costs

Communications with the Claimant

20. The Claimant's solicitors and their contact details are:

DLA Piper UK LLP

Attention: Petra Billing and Rob Shaw

1 St. Paul's Place

Sheffield

S1 2JX

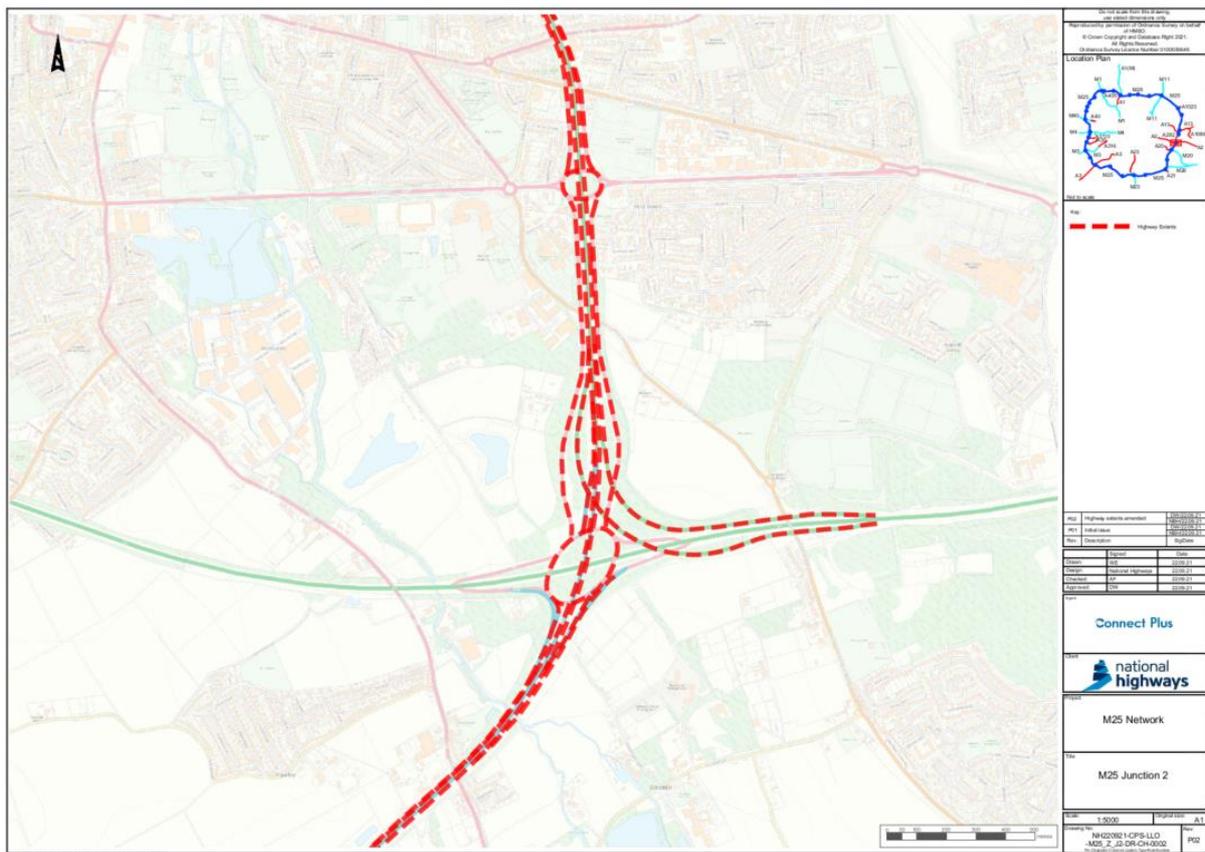
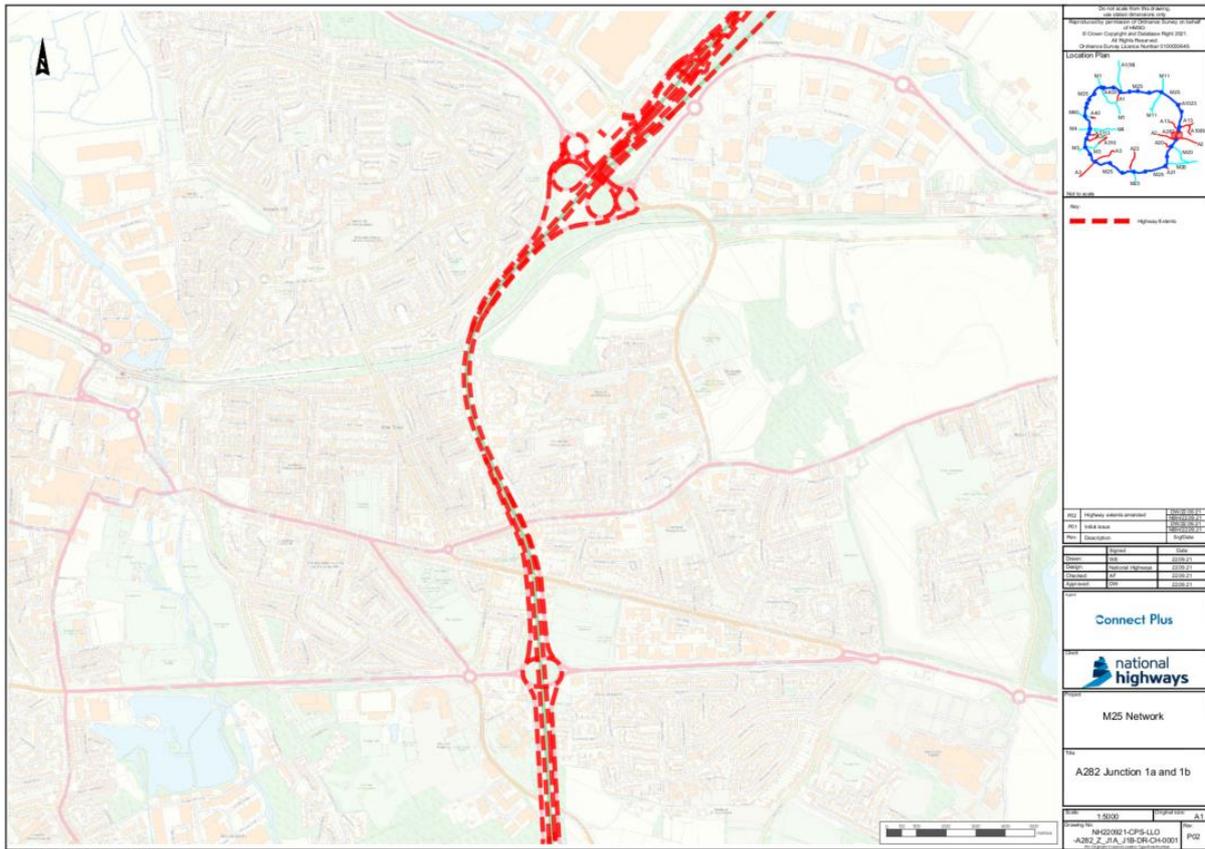
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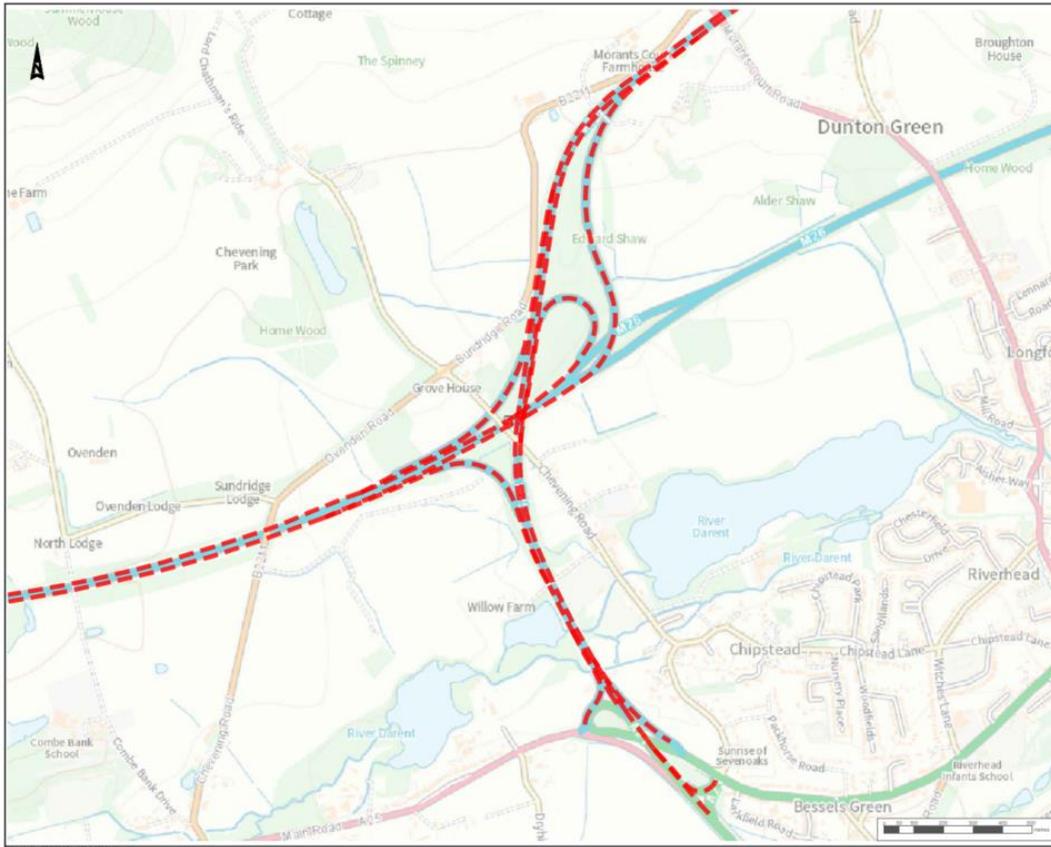
T: 0207 796 6047 / 0114 283 3312

BY THE COURT

MADE ON 26 April 2024

APPENDIX 1





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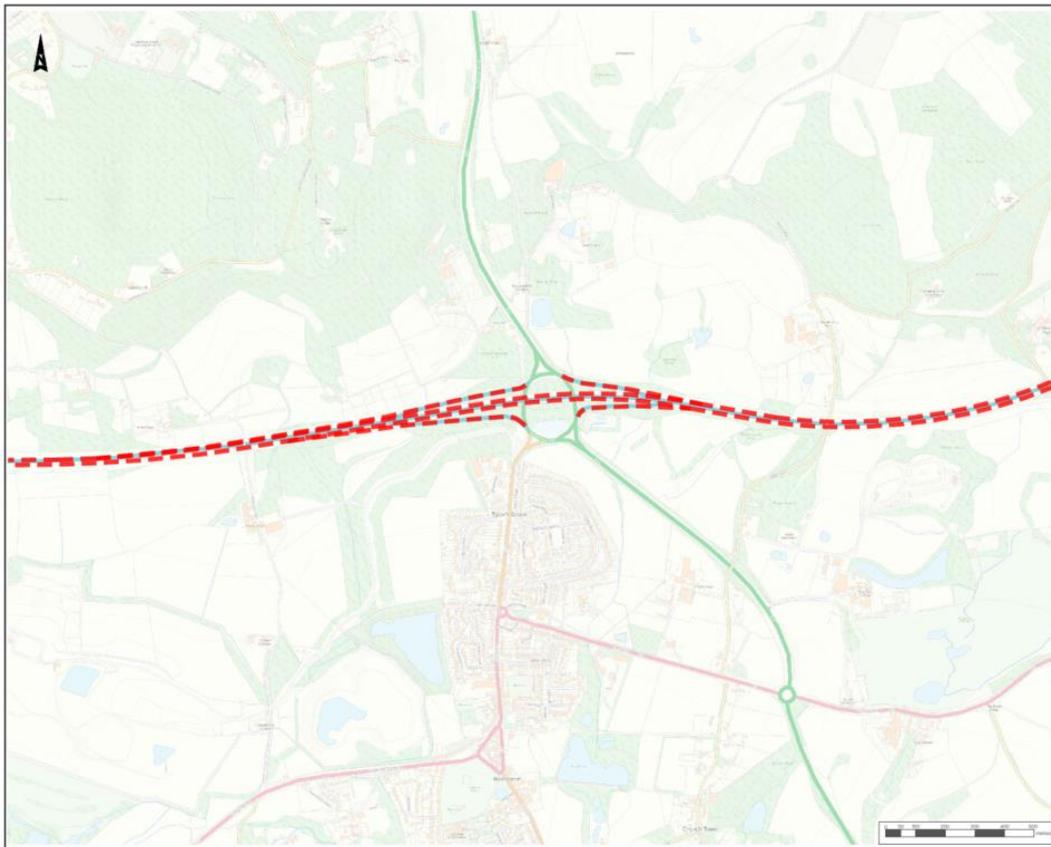
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Scale
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Client	Highways England
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Issue	...
Author	...
Check	...
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national highways
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Scale: 1:5000
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 Date: 2024-11-01
 Page: 10 of 11



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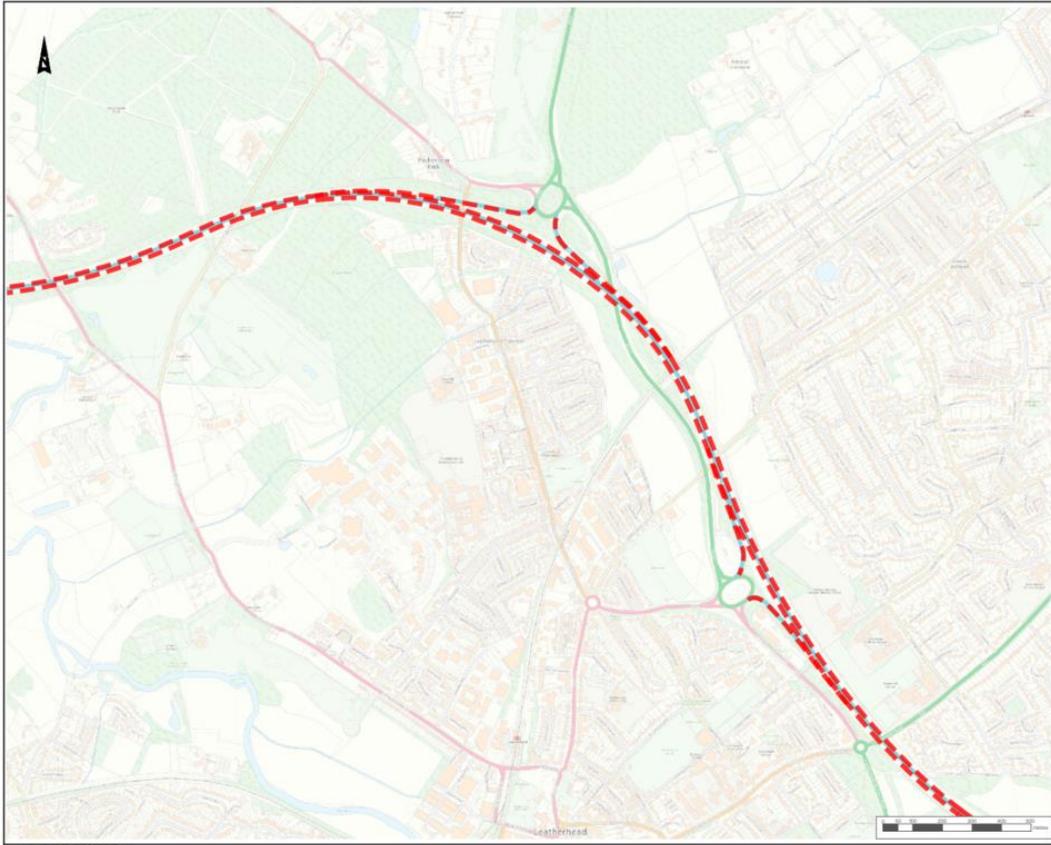
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Issue	...
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Connect Plus
national highways
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Scale: 1:5000
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 Date: 2024-11-01
 Page: 11 of 11



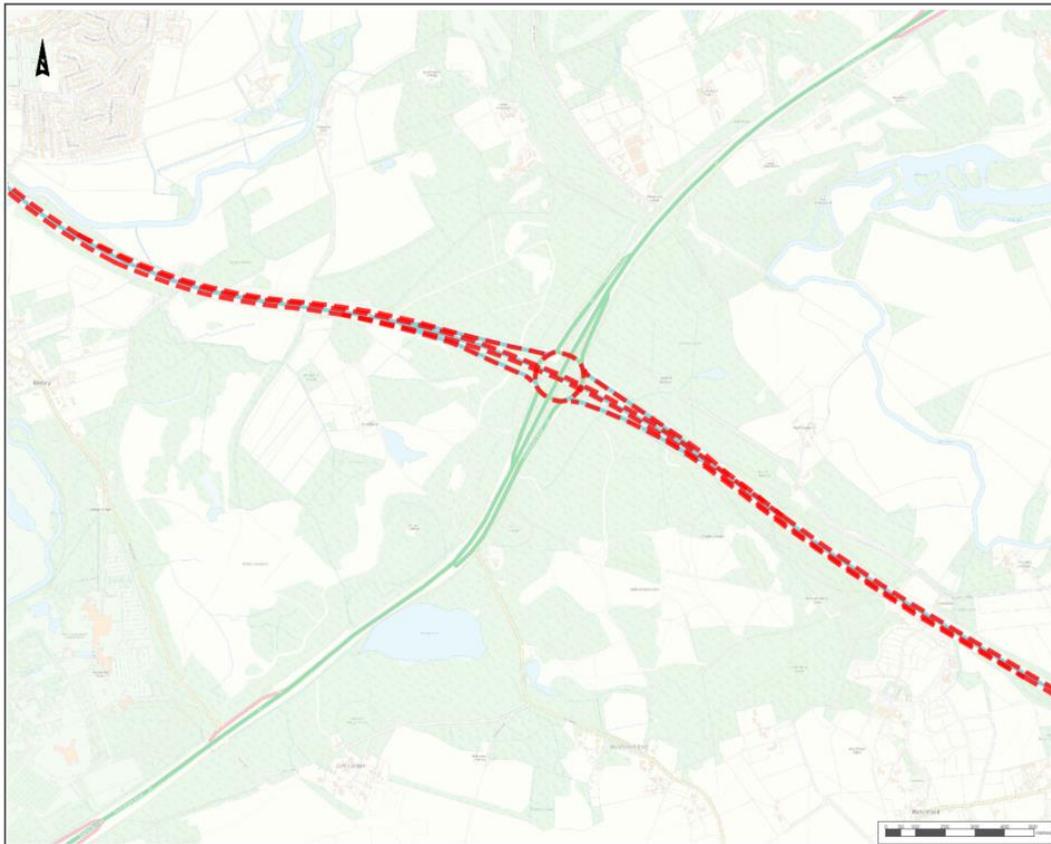
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Rev	Description	Date
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002	Design	09/09/2010
003	Contract Agreement	09/09/2010
004	As Issued	09/09/2010



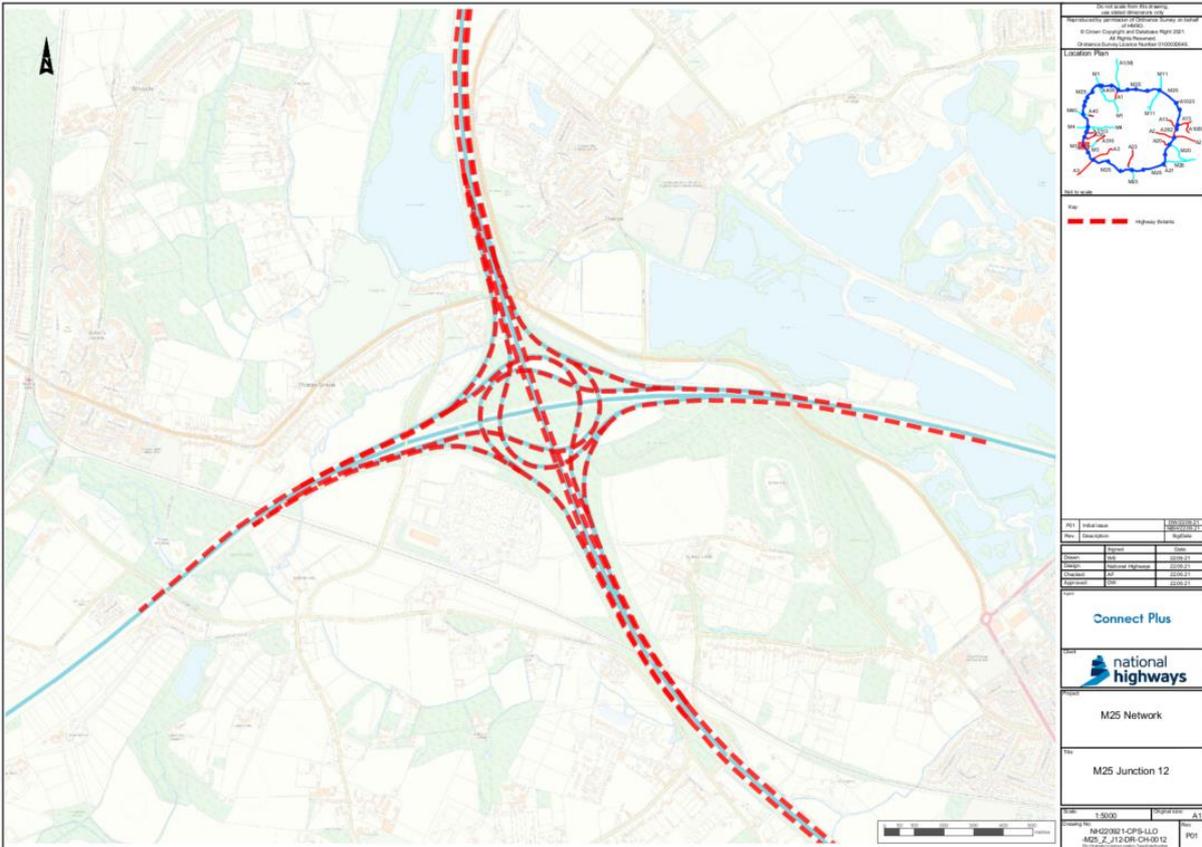
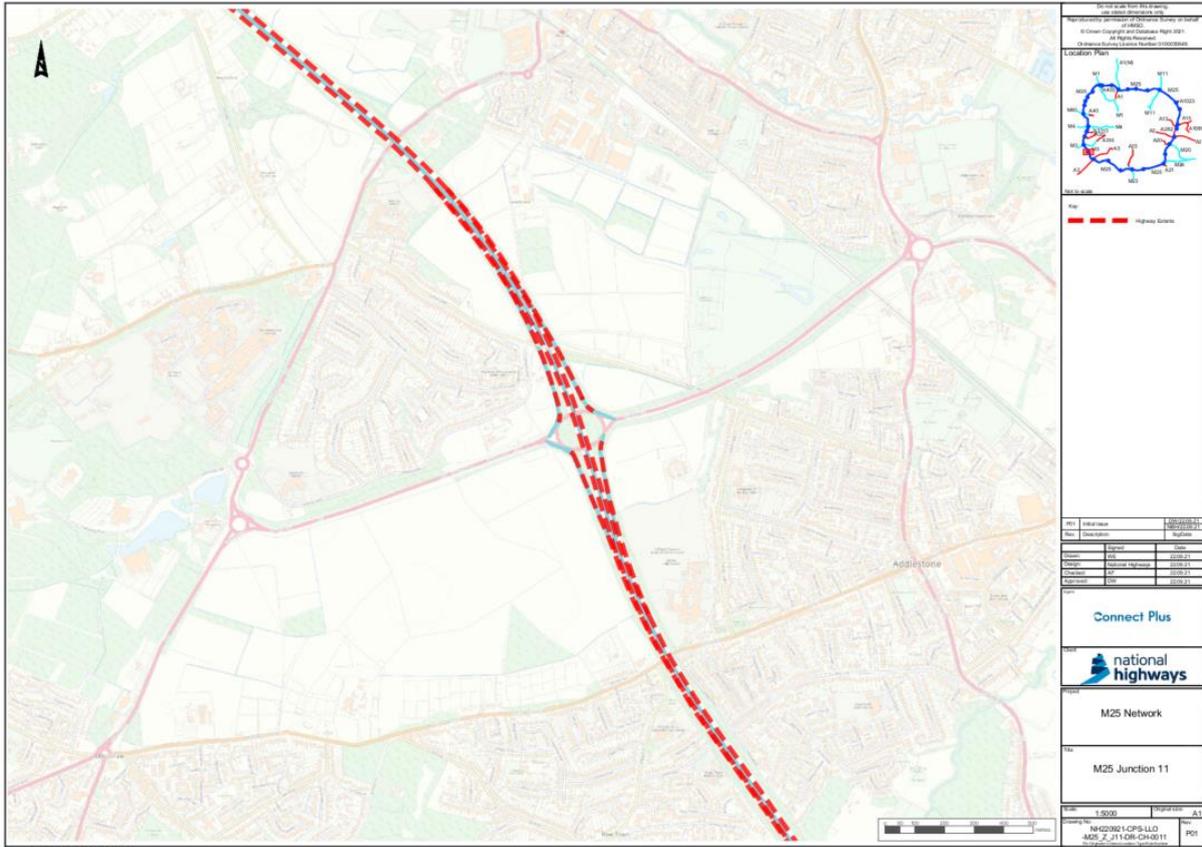
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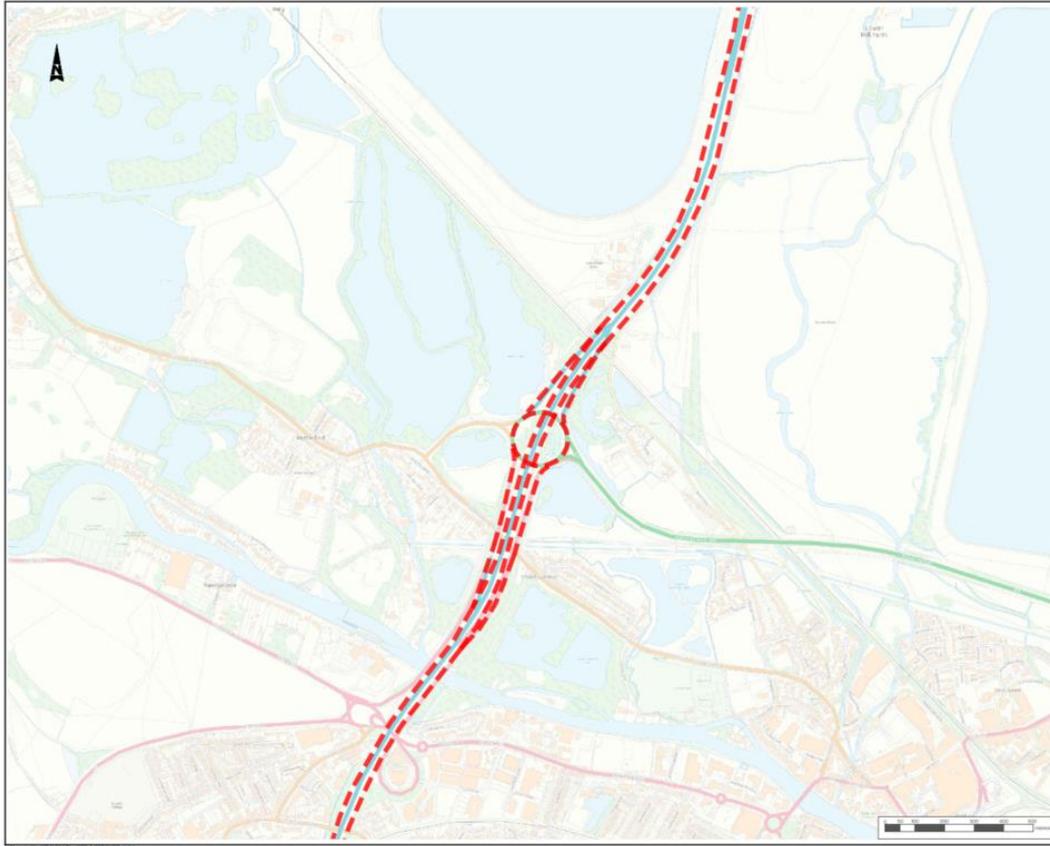
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Connect Plus
national highways
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Rev	Description	Date
001	Highway Authority Approval	09/09/2010
002	Initial Issue	09/09/2010
003	Design	09/09/2010
004	Contract Agreement	09/09/2010
005	As Issued	09/09/2010





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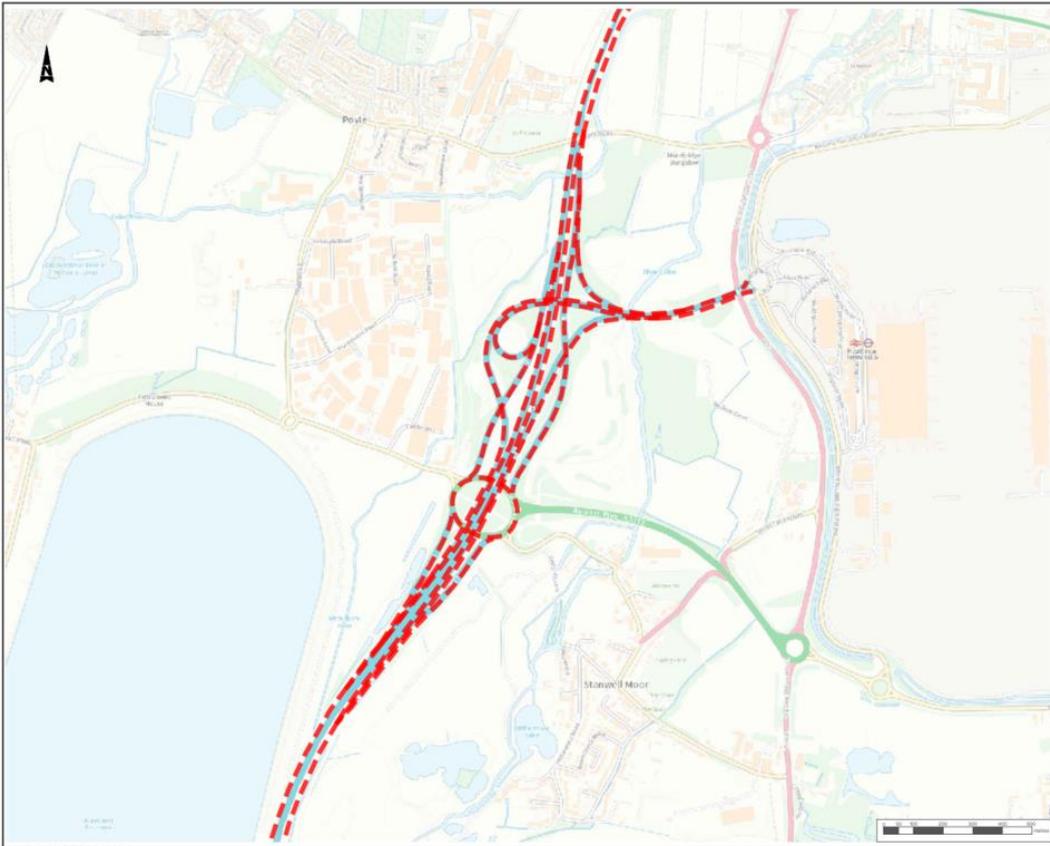
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Author	...
Checker	...
Approver	...
Project Manager	...
Client	...

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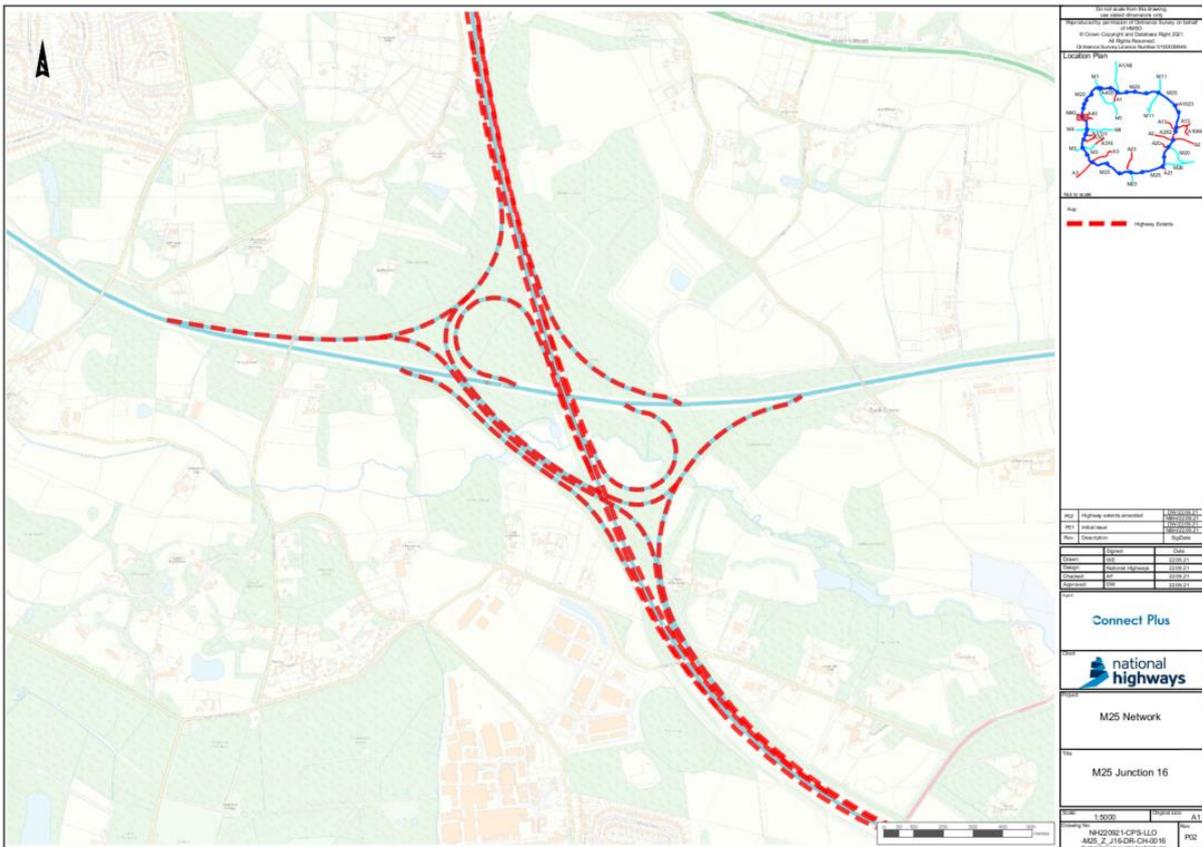
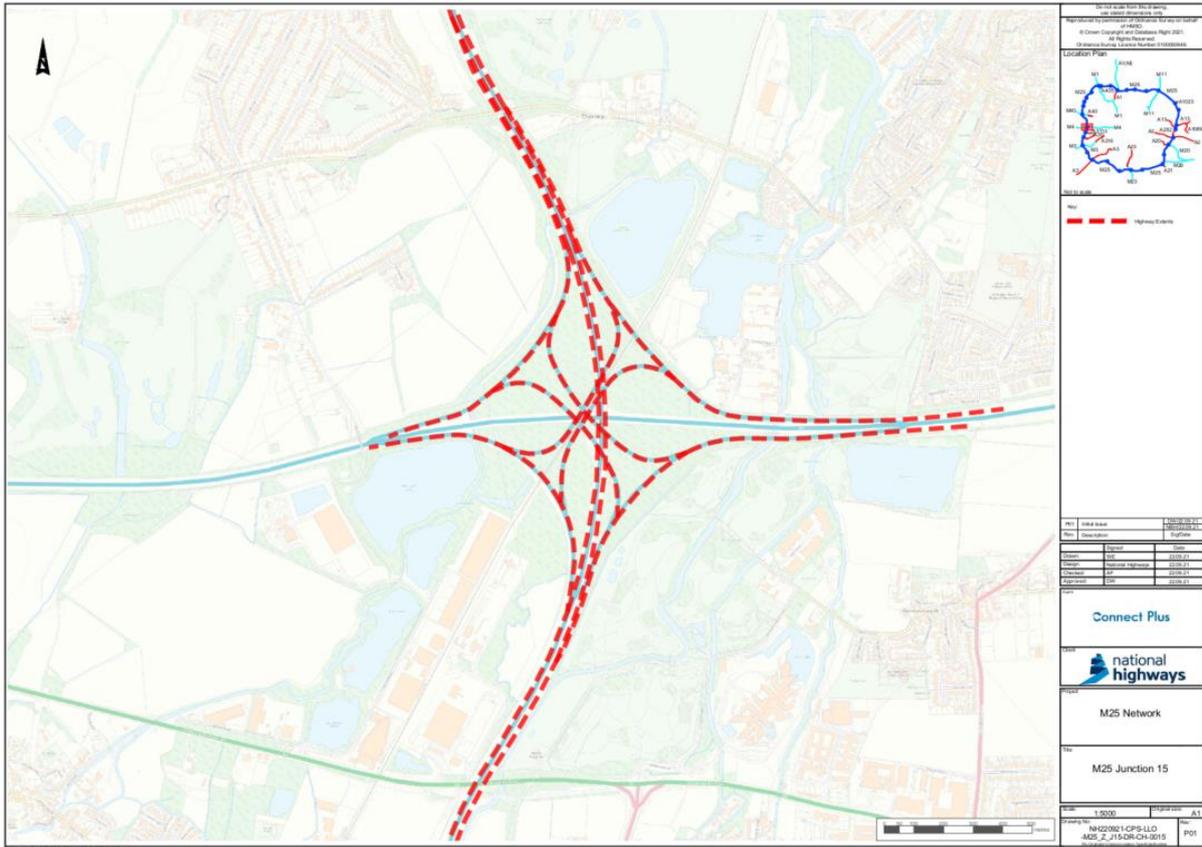
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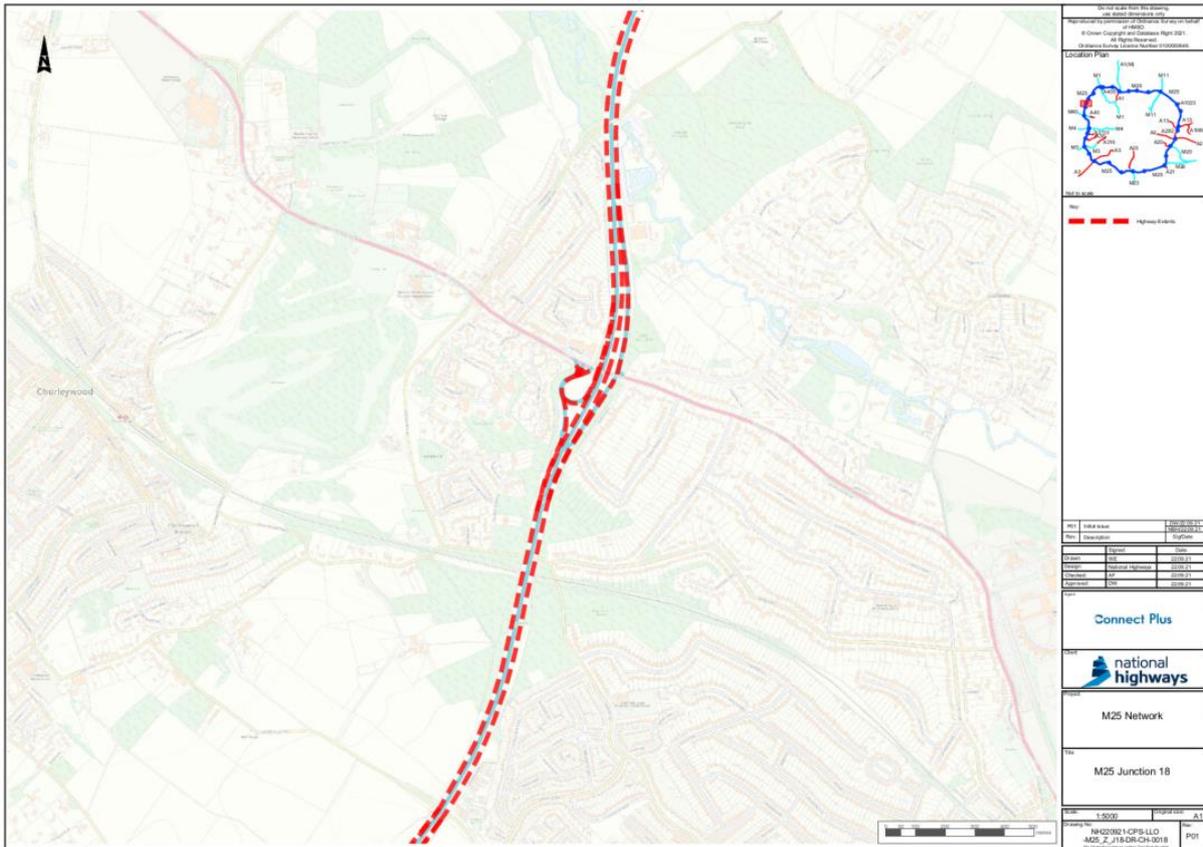
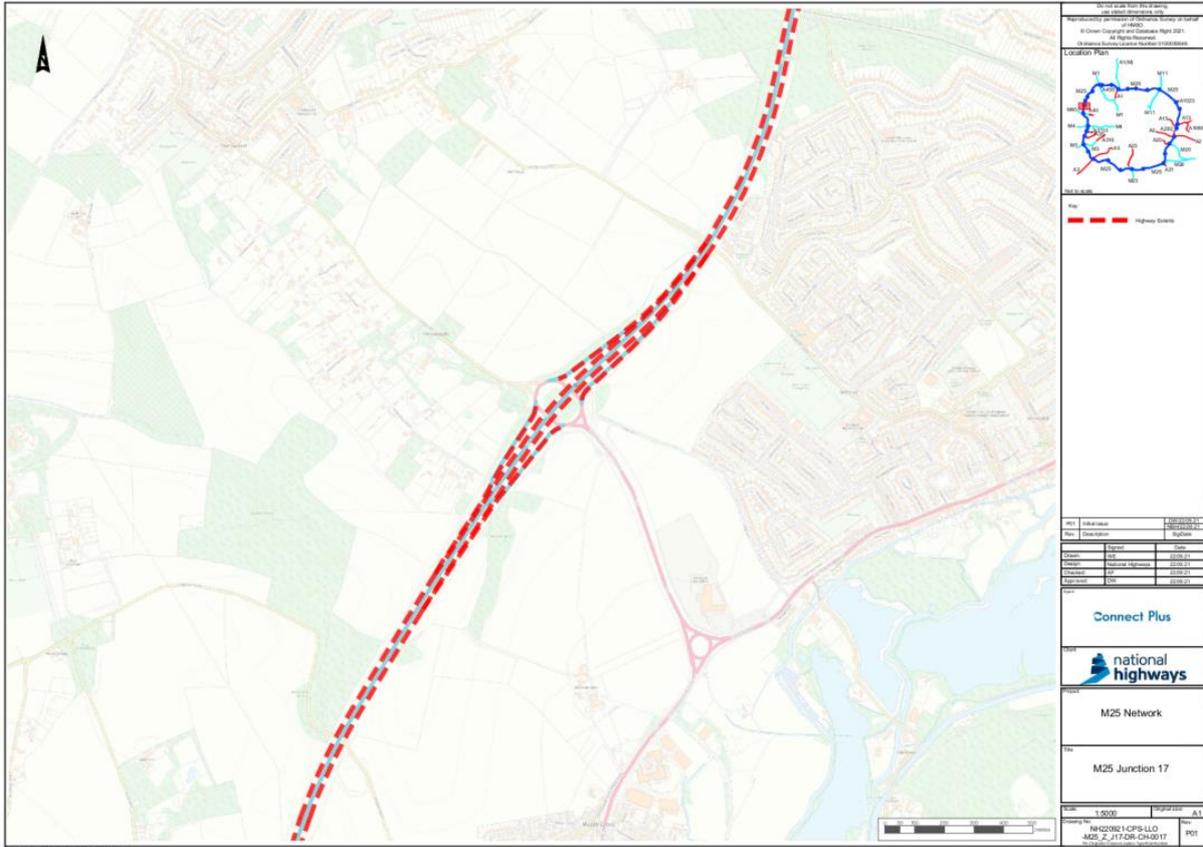
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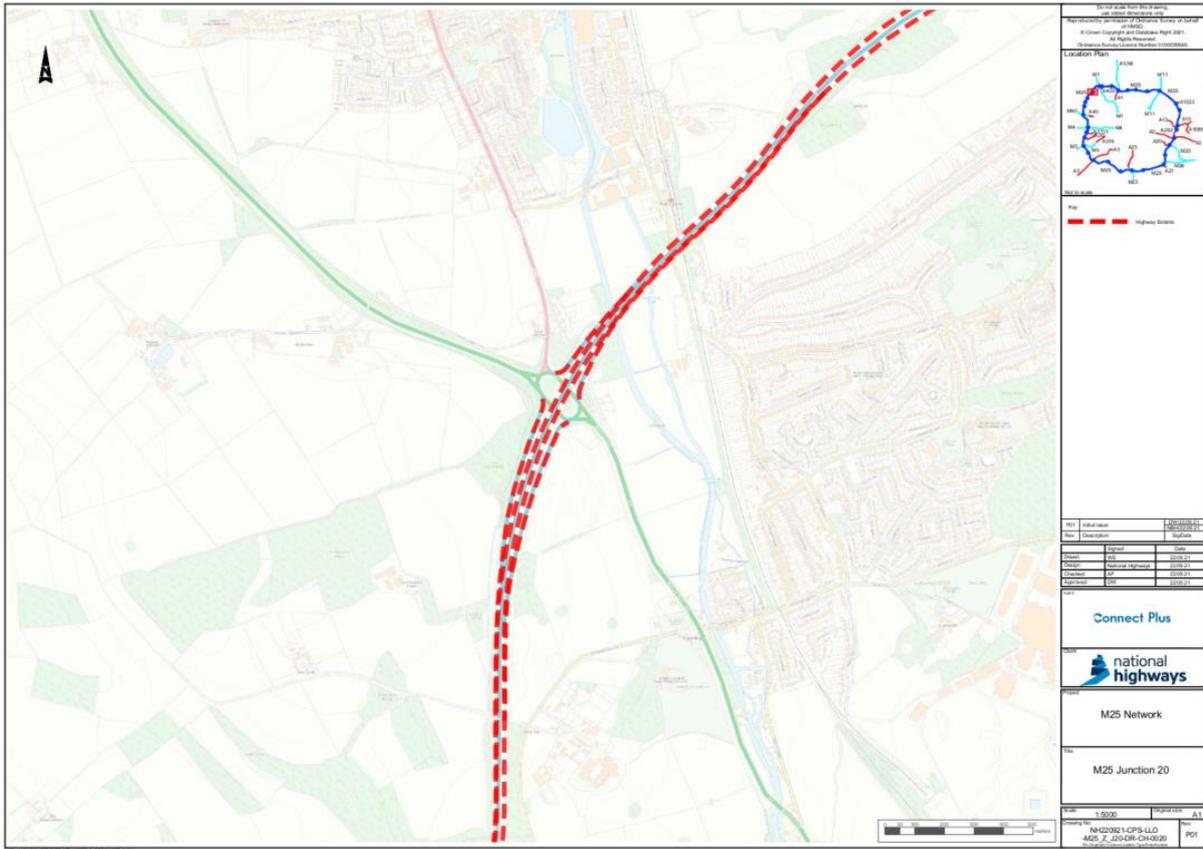
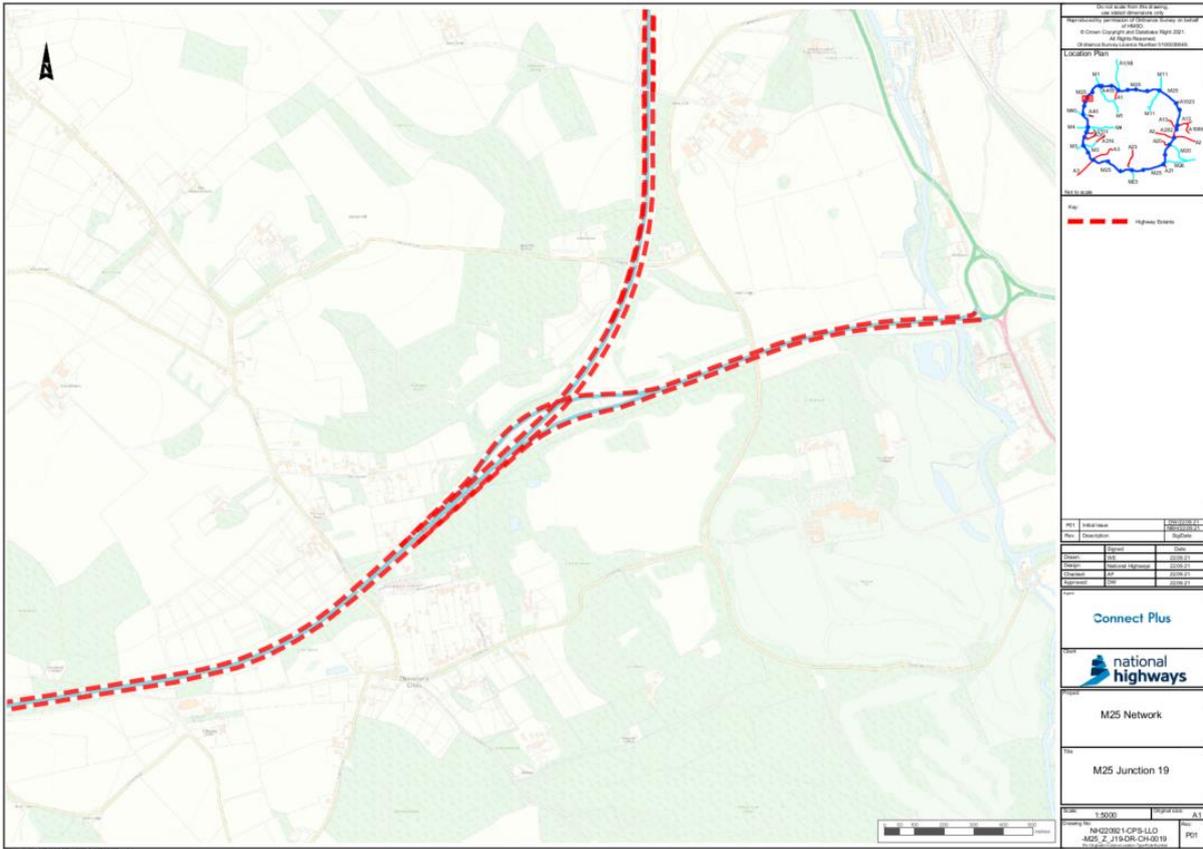
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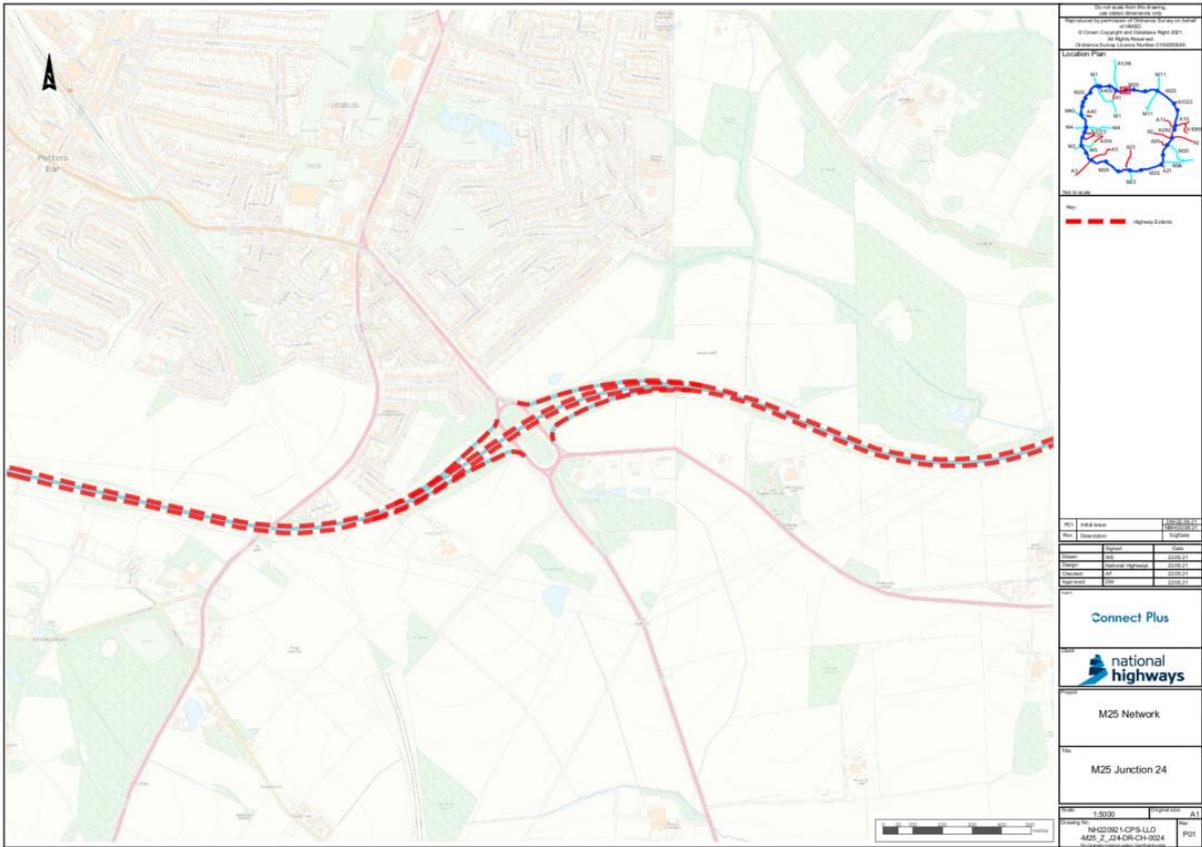
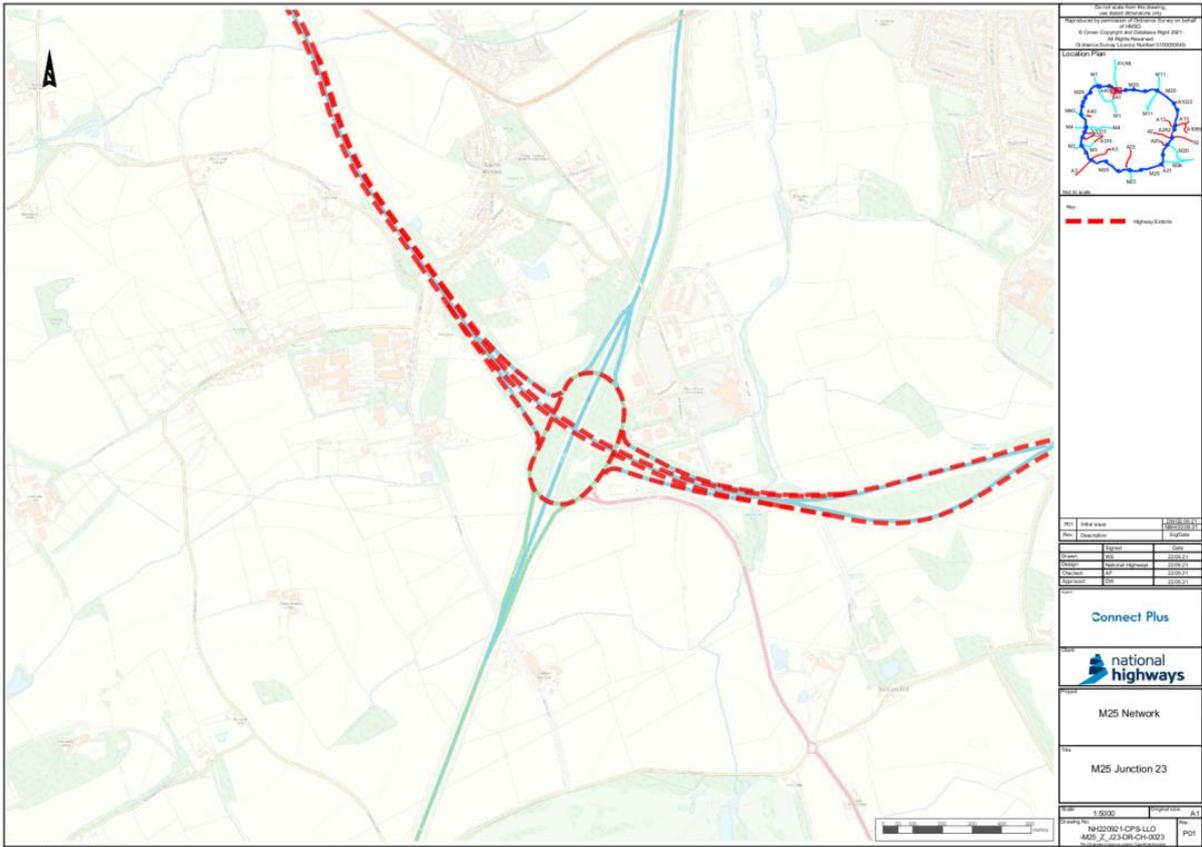
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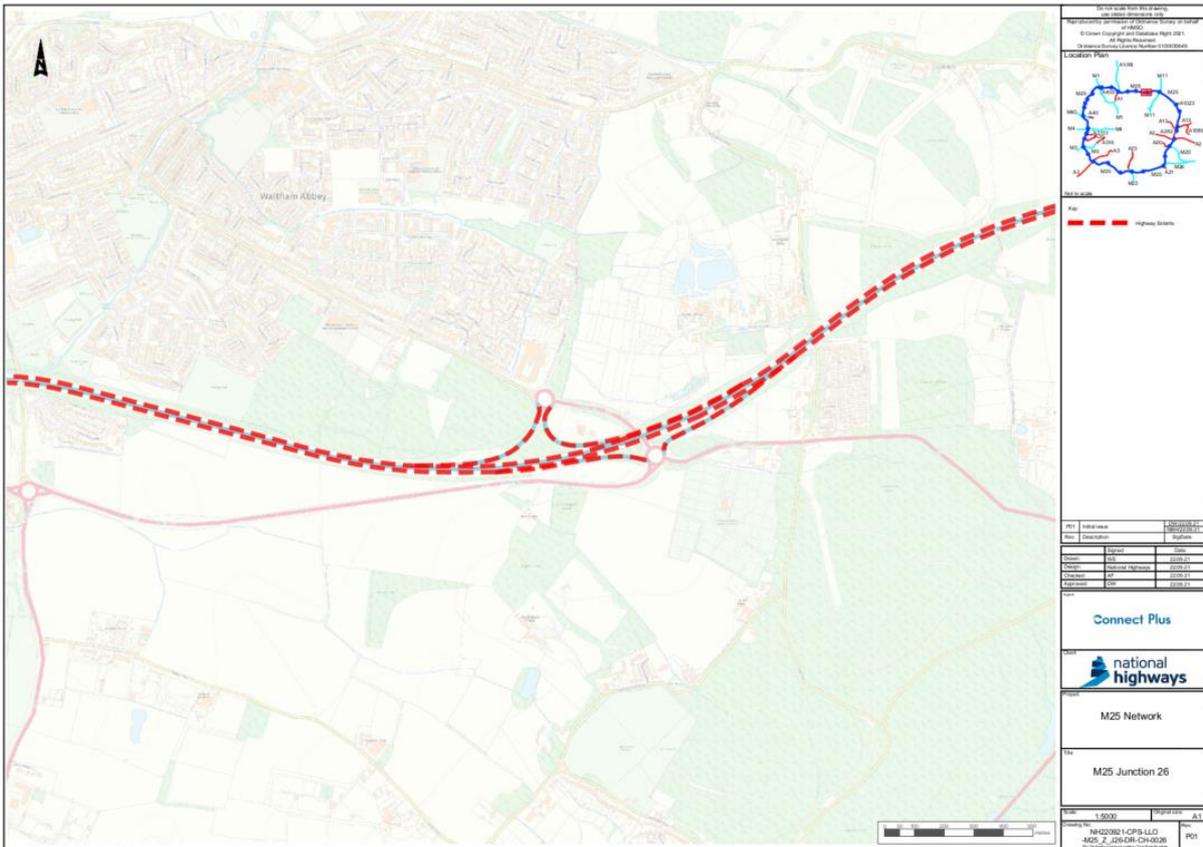
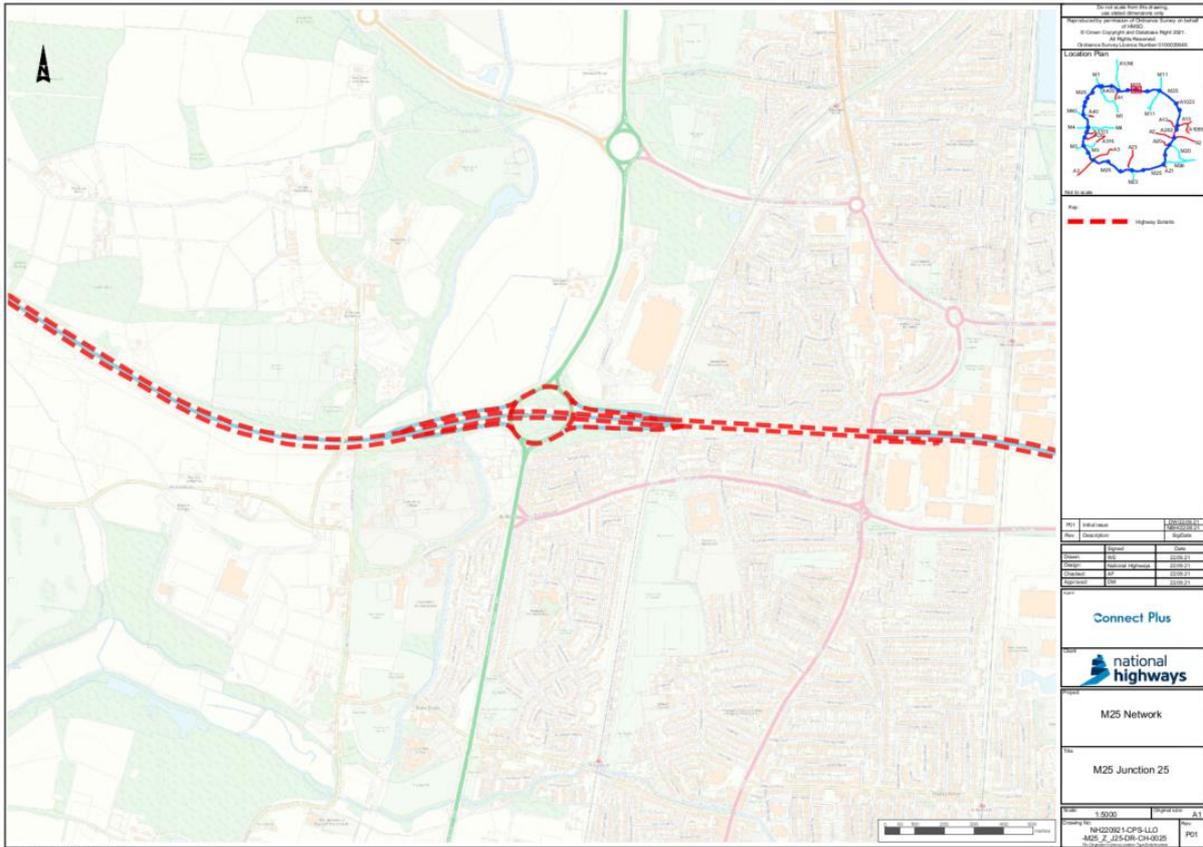
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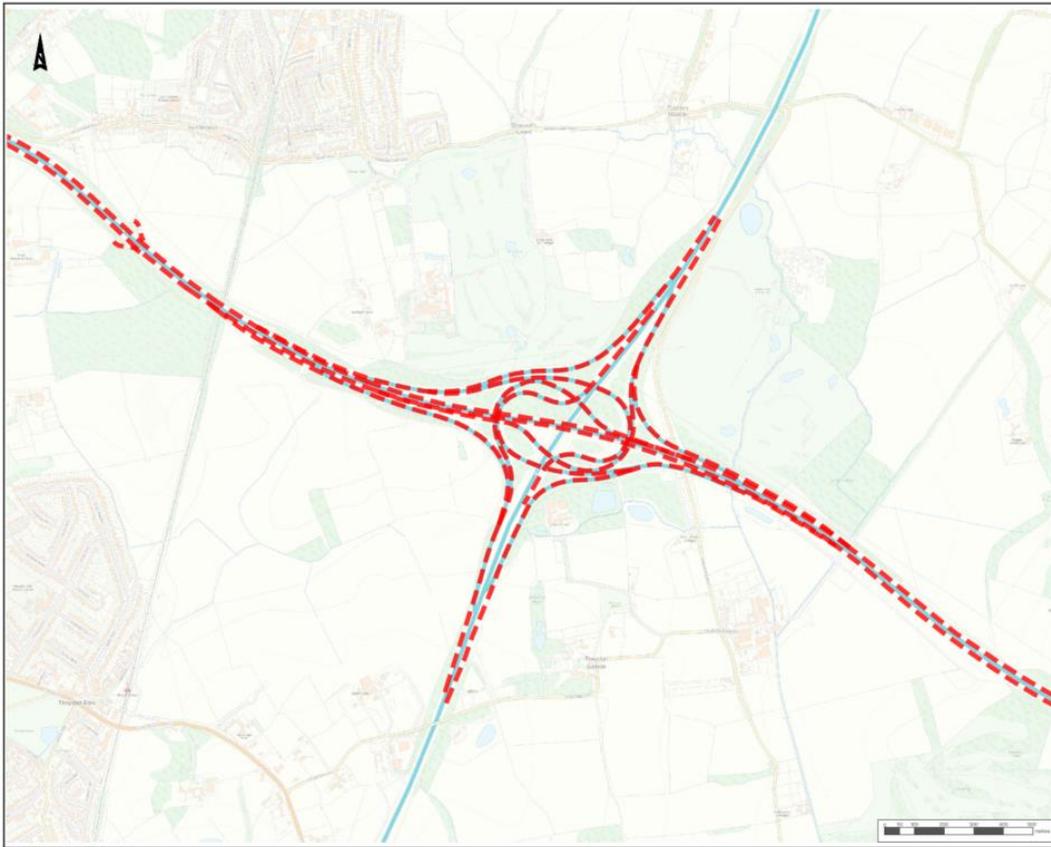












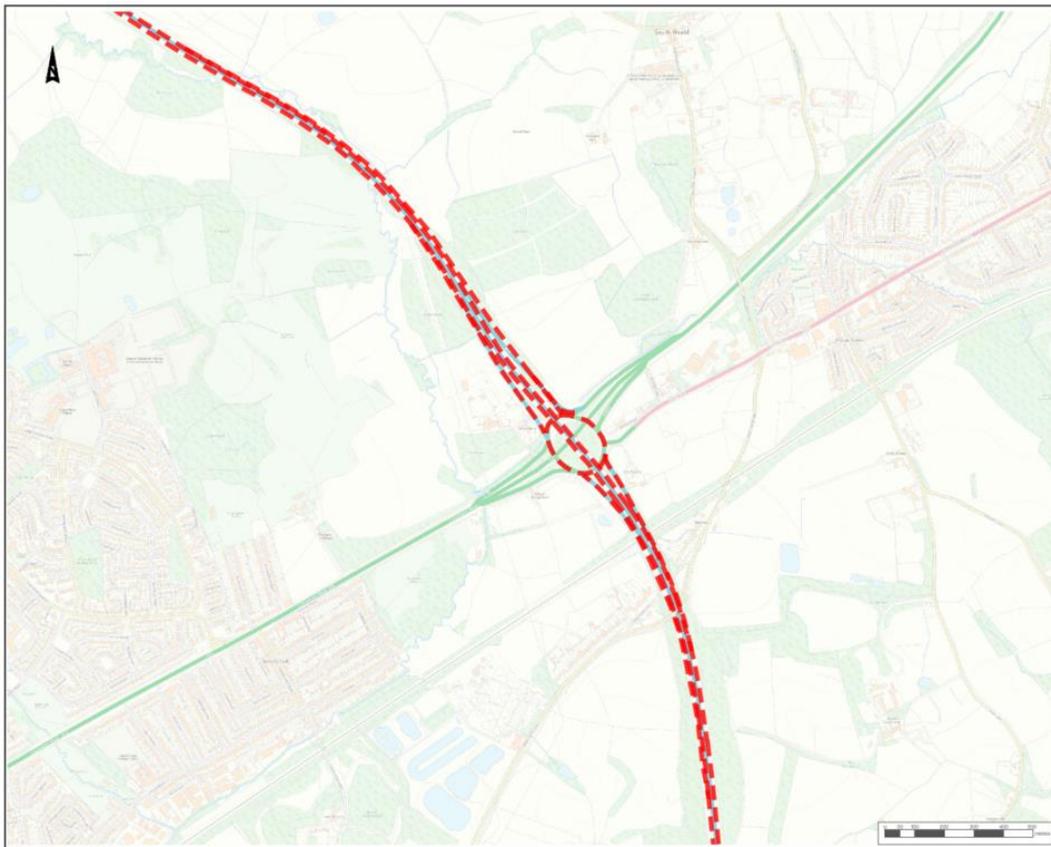
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Location Plan

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NY1	Description	10/10/24	A1
NY1	Author	10/10/24	A1
NY1	Checked	10/10/24	A1
NY1	Approved	10/10/24	A1
NY1	Drawn	10/10/24	A1

Connect Plus
 national highways
 M25 Network
 M25 Junction 27
 1:5000
 10/10/24 A1
 NH202401-CPS-LO
 M25_J_27-DR-CH-0027
 PO1



No. 104 2024 10/10/24
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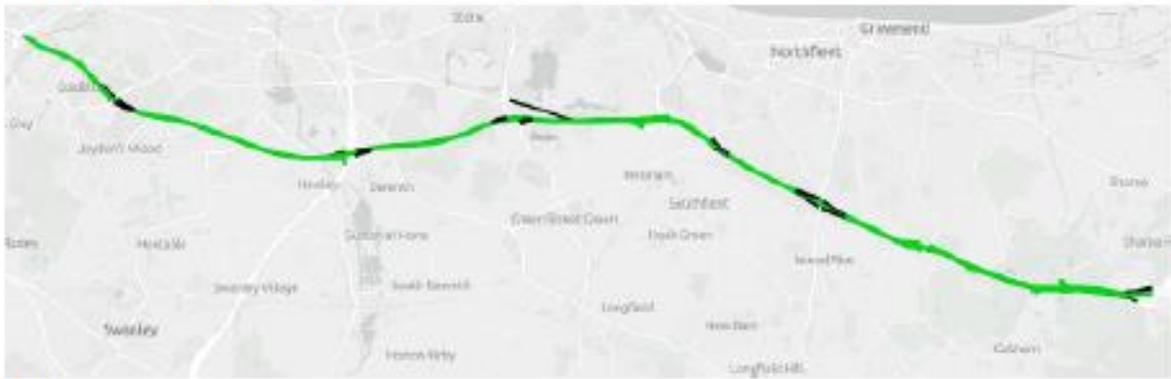
Location Plan

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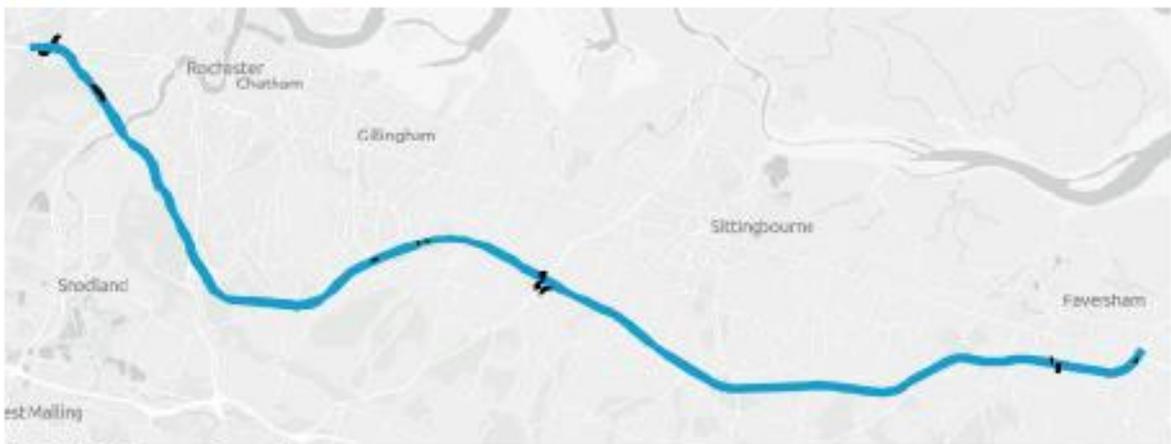
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Connect Plus
 national highways
 M25 Network
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 PO1

A2 London – M2 Section



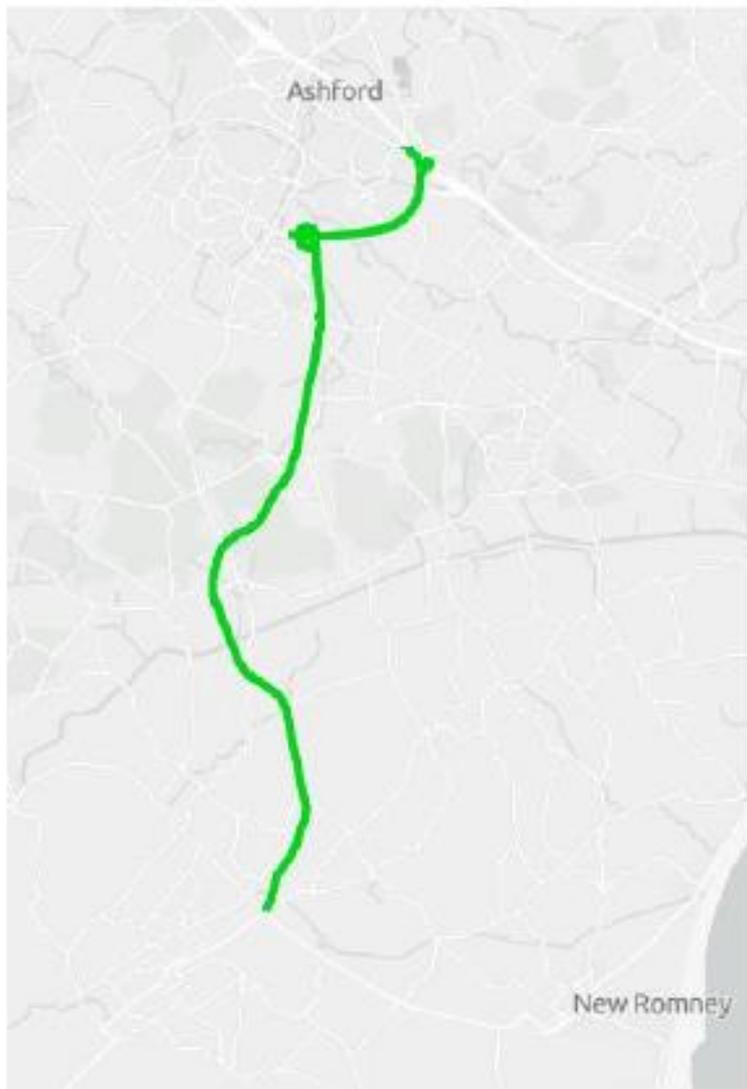
M2



A2 M2 - Dover Section



A2070

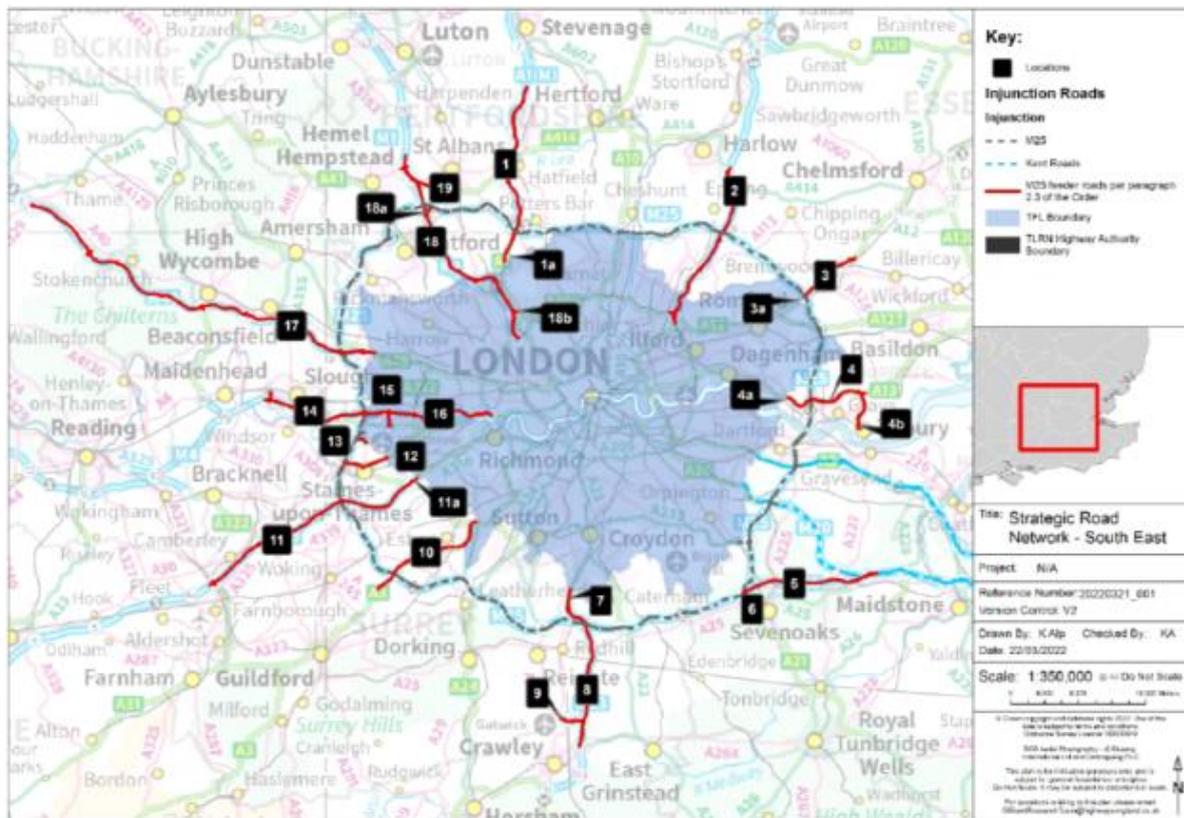


Kent & Surrounding areas SRN



APPENDIX 3

Strategic Road Network – South East



1. A1(M) from Junction 1 to Junction 6

1a. A1 from A1(M) to Rowley Lane

2. M11 from Junction 4 to Junction 7

3. A12 from M25 Junction 28 to A12 Junction 12

3a. A1023 (Brook Street) from M25 Junction 28 roundabout to Brook Street Shell Petrol Station access

4. A13 from M25 Junction 30 to junction with A1089

4a. A13 from junction with A1306 for Wennington to M25 Junction 30

4b. A1089 from junction with A13 to Port of Tilbury entrance

5. M26 (the whole motorway) from M25 to M20
6. A21 from the M25 to B2042
7. A23 from M23 to Star Shaw
8. M23 from Junction 7 to Junction 10 (including M23 Gatwick Spur)
9. A23 between North and South Terminal Roundabouts
10. A3 from A309 to B2039 Ripley Junction
11. M3 from Junction 1 to Junction 4
- 11a. A316 from M3 Junction 1 to Felthamhill Brook
12. A30 from M25 Junction 13 to Harrow Road, Stanwell, Feltham
13. A3113 from M25 Junction 14 to A3044
14. M4 from Junction 4B to Junction 7
15. M4 Spur (whole spur) from M4 Junction 4 to M4 Junction 4a
16. M4 from Junction 1 to Junction 4B
17. M40 from M40 Junction 7 to A40 (Fray's River Bridge)
18. M1 from Junction 1 to Junction 8
- 18a. A405 from M25 Junction 21A to M1 Junction 6
- 18b. A1 from Fiveways Corner roundabout to Hilltop Gardens
19. A414 from M1 Junction 8 to A405

APPENDIX 4

[On the package containing the Injunction]

“VERY URGENT: THIS PACKAGE CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE EMAIL NH-INJUNCTIONS@DLAPIPER.COM”

[To affix to front door when the package has been posted through the letterbox or placed in a mailbox]

“VERY URGENT: A PACKAGE HAS BEEN LEFT THAT CONTAINS AN ORDER OF THE HIGH COURT AND YOU SHOULD READ IT IMMEDIATELY AND SEEK LEGAL ADVICE. IF YOU NEED ANOTHER COPY PLEASE EMAIL: NH-INJUNCTIONS@DLAPIPER.COM”

SCHEDULE 1 – NAMED DEFENDANTS

For the avoidance of doubt, any person who has previously been a named defendant in these proceedings in the Cotter Injunction, or who has given undertakings to the Court in these proceedings, may nevertheless become Defendant 1 as a person unknown if they commit any of the prohibited acts.

	Name	Details
1.		PERSONS UNKNOWN CAUSING THE BLOCKING OF, OR ENDANGERING, OR OTHERWISE PREVENTING THE FREE FLOW OF TRAFFIC ON THE M25 MOTORWAY, A2, A20 AND A2070 TRUNK ROADS AND M2 AND M20 MOTORWAY, A1(M), A3, A12, A13, A21, A23, A30, A414 AND A3113 TRUNK ROADS AND THE M1, M3, M4, M4 SPUR, M11, M26, M23 AND M40 MOTORWAYS FOR THE PURPOSE OF PROTESTING
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4.	Not used	
5.	Not used	
6.	Not used	
7.	Not used	
8.	Not used	
9.	Not used	
10.	Not used	
11.	Not used	
12.	Not used	
13.	Not used	
14.	Catherine RENNIE-NASH	

15.	Not used	
16.	Not used	
17.	Not used	
18.	Not used	
19.	Not used	
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47.	Not used	
48.	Not used	
49.	Not used	
50.	Julia SCHOFIELD	

51.	Not used	
52.	Karen WILDIN	
53.	Liam NORTON	
54.	Louis MCKECHNIE	
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93.	Stephen Charles GOWER	
94.	Not used	
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98.	Not used	
99.	Not used	
100.	Tessa-Marie BURNS	
101.	Theresa NORTON	
102.	Not used	
103.	Not used	
104.	Tracey MALLAGHAN	

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135.	Not used	
136.	Morgan TROWLAND	
137.	Not used	
138.	Not used	
139.	Not used	
140.	Not used	

SCHEDULE 2

CHIEF CONSTABLES OF THE FORCES OF:

City of London Police

Metropolitan Police Service

Avon and Somerset Constabulary

Bedfordshire Police

Cambridgeshire Constabulary

Cheshire Constabulary

Cleveland Police

Cumbria Constabulary

Derbyshire Constabulary

Devon & Cornwall Police

Dorset Police

Durham Constabulary

Essex Police

Gloucestershire Constabulary

Greater Manchester Police

Hampshire Constabulary

Hertfordshire Constabulary

Humberside Police

Kent Police

Lancashire Constabulary

Leicestershire Police

Lincolnshire Police

Merseyside Police

Norfolk Constabulary

North Yorkshire Police

Northamptonshire Police

Northumbria Police

Nottinghamshire Police

South Yorkshire Police

Staffordshire Police

Suffolk Constabulary

Surrey Police

Sussex Police

Thames Valley Police

Warwickshire Police

West Mercia Police

West Midlands Police

West Yorkshire Police

Wiltshire Police

