

6<sup>th</sup> March 2026

Baroness Anne Longfield

Chair of the Independent Inquiry

Dear Home Secretary and Baroness Longfield,

**FORMAL SUBMISSION: THE TERMS OF REFERENCE - NATIONAL INQUIRY  
INTO GROOMING GANGS**

I, Maggie Oliver, on behalf of The Maggie Oliver Foundation (TMOF) and an advisory group of survivors and victims who TMOF supports (the TMOF Survivor Panel), write regarding the Government's consultation document, publicized ahead of agreeing Terms of Reference for the National Inquiry into Grooming Gangs.

On Friday 20<sup>th</sup> February 2026, we facilitated a meeting between yourselves, the Inquiry panel and our ever-growing TMOF Survivor Panel. Following detailed review and consultation with the group of survivors following that meeting, we set out in the attached document our combined formal concerns and recommendations prepared in consultation with our legal representatives at Howe & Co and Landmark Chambers.

You have suggested that observations are provided via a supplied form. However, given the numbers of survivors we represent, and the detail of their views, it is appropriate to set out those view more fully and more formally.

The observations and undertakings sought represent the collective position of the TMOF Survivor Panel, which is made up of over two dozen survivors and their families, people who have experienced the life-changing consequences of the crimes of so called "grooming gangs/rape gangs" and systemic failures to investigate, prosecute and prevent these crimes. Their insights are shared alongside my own 20 years of detailed professional experience handling hundreds of individual cases: as a former detective, as a whistleblower, through direct involvement in the independent Inquiry into Child Sexual Abuse (IICSA) "Organised Networks" strand, in our work with Baroness Casey on her audit last year and, of course, as Founder and Chair of The Maggie Oliver Foundation since 2019.

Survivors experience the impact of their sexual abuse and exploitation daily over decades, as well as the trauma of not being properly protected by the very systems, agencies and individuals whose job it was to do so. Survivors we brought to meet you in February were

as young as 12 when this began. You will recall the shocking testimony of two survivors who spoke of the generational impact of their abuse; whereby their children were “marked” by Social Service at birth, as a consequence of the fact that they (the mothers) had been abused as children. Rather than be treated as victims of crime and supported, survivors are treated as suspects to be monitored; as so the failure to address organized abuse is transmitted to the next generation.

Whilst a serving detective in Greater Manchester Police, I witnessed these failures firsthand when working on Operation Augusta and Operation Span, and in the two decades since have seen the same patterns countless times. Consequently, these reflections are grounded in lived experience, frontline investigation, and scrutiny of previous Inquiry processes, including where those processes have fallen severely short of delivering justice.

During our meeting, survivors from across the country, including Rochdale, Rotherham, Telford, Barrow, Hull, Huddersfield, Bradford, Keighley and London told you very clearly that inadequate charges against their rapists and abusers had been authorized. Often serious rape and exploitation allegations were downgraded, and prosecutorial decisions failed to reflect the gravity of their sexual exploitation and abuse by organized networks of predators. Cases where offences of child rape for instance had led only to charges of ‘conspiracy to commit sexual activity with a child’ or ‘trafficking’. In some cases, a pregnancy had been the result of these rapes, yet police and prosecutors chose not to charge adequately

Senior office holders, including prosecutors, have a duty to uphold the law without fear or favour. Where evidence suggests deliberate inaction, suppression, reckless failure to act, or protection of institutional reputation over child safety, criminal referral must follow. Public confidence depends on visible, enforceable accountability, not administrative discipline handed out by the very institutions responsible for the current collapse of public trust.

We send this letter following a High Court judgement yesterday, granting permission for The Maggie Oliver Foundation to bring a judicial review against the Government for its failure to act on the recommendations of the Independent Inquiry of Child Sexual Abuse (IICSA). Mr. Justice Kimblin described our action as, “A paradigm example of public interest litigation”.

While we understand that the Government is not obliged to implement the recommendations of any inquiry, yesterday’s judgement gives a clear signal that where repeated promises are made by the Government to act on the safety of children across the UK, they must justify why they will not do so.



As such, we ask that the Chair of Inquiry seeks a commitment from the Government that it will act on her panel's findings and recommendations, and will do so within one year of the final report being laid before Parliament.

The Maggie Oliver Foundation does not wish to find itself in the High Court again, in three years' time, seeking to compel government (again) to implement urgent recommendations designed to safeguard our children.

We look forward to working with you to ensure this Inquiry puts survivors at its heart and delivers much-overdue change.

Yours sincerely,

Maggie Oliver along with The Maggie Oliver Foundation and survivors, victims and their families

NATIONAL INQUIRY INTO GROOMING GANGS  
CONSULTATION ON THE DRAFT TERMS OF REFERENCE  
SUBMISSION ON BY  
THE MAGGIE OLIVER FOUNDATION (TMOF) AND  
THE ADVISORY GROUP OF SURVIVORS AND VICTIMS WHO TMOF SUPPORTS  
(THE TMOF SURVIVOR PANEL)  
6 MARCH 2026

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1. On 9 December 2005 the Chair of the Independent Inquiry into Grooming Gangs (The Inquiry) officially launched its public consultation on the draft Terms of Reference (ToR), with an invitation for victims, survivors, and the public to submit their views. The consultation closes on 6 March 2026.
2. The Maggie Oliver Foundation ('TMOF') make these initial observations on the draft terms of reference published by the Secretary of State ('Secretary of State') on behalf of the members of TMOF and the Advisory Group of Survivors and Victims (TMOF Survivor Panel).
3. The final Terms of Reference must be drafted in a manner that is sufficiently wide, so as to encompass the issues that are raised in these submissions.

**Preliminary issues**

4. **First**, we seek confirmation from the Chair that the TMOF Survivor Panel, and others, will be afforded the opportunity to make observations on the actual draft Terms of Reference when they are settled by the Secretary of State. It is important that the Secretary of State does not omit any material matters from the Inquiry's

remit. We require an assurance that when the actual draft Terms of Reference are settled, TMOF, those they represent and others are afforded the opportunity to make observations on them before they are finalised.

5. The document that we have been asked to make observations on, *“Independent Inquiry into Grooming Gangs: draft terms of reference”* (11 December 2025), is not a set of draft Terms of Reference, it is a wider document that appears to seek view on a wide range of issues that will lead to the development of draft Terms of Reference. We refer to this throughout as the Consultation Document.
6. **Second**, and as set out below and in the letter sent on behalf of TMOF on 27 February 2026 (further copy enclosed), victims and survivors have a profound trust deficit. This concern is well founded, for example as a result of the failure to implement the recommendations of the Independent Inquiry into Child Sexual Abuse (IICSA) and Baroness Casey’s National Review. These matters raise the natural concern that any recommendations made by this Inquiry will not be implemented.
7. The TMOF Survivor Panel and TMOF therefore ask that the Chair seek and obtain an undertaking from the Government that it will implement any recommendations made by the Inquiry within one year of those recommendations being laid before Parliament.
8. **Third**, TMOF, the TMOF Survivor Panel and others, are deeply concerned at the descriptor term *“Grooming Gangs/Rape Gangs”*. This phrase downplays the violence and seriousness of this national issue. Serious thought must be given as to how to describe this distinct form of abuse.

## Background

6. We will not repeat the tortuous path that has led to the establishment of this Inquiry, other than to note that had the Government implemented Recommendation One of the IICSA, this Inquiry might not have been necessary.
7. These initial submissions follow the meeting on 20 February 2026, between the Inquiry Chair and panel and the TMOF Survivor Panel. We have consulted with survivors in the short time available since that meeting.
8. As you are aware, survivors of organised abuse are uniquely placed to provide essential insights due to their lived experiences of abuse at the hands of the so-called “Grooming Gangs/Rape Gangs”, and the systemic failures to investigate, prosecute and prevent these crimes.
9. In addition to the experiences of the victims, TMOF brings Maggie Oliver’s 20 years of focused professional experience handling hundreds of individual cases – as a former detective, as a whistleblower, through direct involvement as a Core Participant in the IICSA “Organised Networks” strand, in our work with Baroness Casey on her audit last year and, of course as Founder and Chair of The Maggie Oliver Foundation since 2019.

### **Recommendations of the Independent Inquiry on Child Sexual Abuse (IICSA)**

10. As detailed in the introduction to these submissions, survivors have serious concerns that any recommendations made by the Inquiry will not be implemented.
11. Baroness Casey in her National Audit Report predicated all of her recommendations, including recommendation 2 (which grounds this Inquiry) on

*“Before setting out this audit’s recommendations, we want to acknowledge the importance of the recommendations made by the Independent Inquiry on Child Sexual Abuse (IICSA) in their final report to improve how child sexual abuse as a*

*whole, should be tackled. Our recommendations are therefore made on the basis that their proposals for change are being implemented.” [Emphasis added]:*

12. This has not happened, and The Maggie Oliver Foundation has been required to issue judicial review proceedings in the High Court. On 5 March 2026 Mr Justice Kimblin granted permission on two grounds of challenge and described the action as “A paradigm example of public interest litigation”.
13. Victims and survivors have serious concerns about what the effectiveness of this Inquiry will be, having undergone the traumatic experience of giving evidence to IICSA, and then (over 3 ½ years after those recommendations were made) needing to seek a Judicial Review in an attempt to secure implementation of those Recommendations.
14. The trust deficit held by victims and survivors are therefore well founded. It is for the Inquiry and its Chair to allay this fundamental concern.
15. In order to foster a trusting relationship with victims, it is important that there is an undertaking in the final ToR (which as yet are unpublished) that any recommendations made by this Inquiry are implemented within one year of being laid before Parliament. At the very least a clear timetable for implementation should be provided within a year of the Inquiry reporting.

### **Restorative Justice**

16. One initiative that the ToR could provide for (or provide the Chair with latitude to instigate), is that the Inquiry either implement, as part of its work, or consider and recommend, the establishment of a national restorative justice programme. This would be consistent with recommendation 11 of the Post Office Horizon IT Inquiry

First Report of 8 July 2025, and the restorative justice programme that flowed from that recommendation.

## **Transparency**

17. The State has failed to protect victims. TMOF maintains that the ToR should make explicit provision for representatives of the relevant authorities to be compelled to provide evidence to the Inquiry and not to be able to rely upon any form of confidentiality and/or public interest excuse to withhold evidence.
  
18. Institutional Core Participants should act in accordance with the statutory duty of candour, that will be imposed when the Public Accountability Bill is enacted.

## **Criminal Accountability for Senior Public Servants and Prosecutorial Decision-Making**

19. The Inquiry ToR must provide the Inquiry with full powers to investigate and address failures by senior public servants, including police leaders, council executives, safeguarding heads and senior prosecutors within the Crown Prosecution Service (CPS). Such investigation must extend to scrutiny of inadequate charges being brought.

Given that a statutory inquiry does not have the power to make criminal or civil findings, the Inquiry if it finds that conduct amounts to potential criminal conduct, must have the power (and the ToR permit) to refer such conduct for investigation and potential prosecution. The language in the Consultation Document around accountability is wholly insufficient, referring only to referrals to “relevant professional bodies.....where failures to carry out duties and responsibilities are suspected”.

20. In order to address these issues, the ToR must provide the Inquiry with the power to address/include the following:

- Examine where failures by councils, police forces and the CPS amount to criminal neglect/misconduct;
- Address deliberate cover-ups, suppression of evidence, premature case closures, or intimidation of whistleblowers;
- Clarify that regulatory or internal disciplinary processes cannot ever substitute for criminal investigation;
- The reports already published in relation to towns and cities around the UK (including Rotherham, Manchester (Operation Augusta), Rochdale (Operation Span) and Telford) must be part of the evidence scrutinised by this Inquiry. The evidence has already been gathered in those inquiries, and they are a rich source of information which must not be overlooked.

21. In respect of the CPS, the Inquiry must examine where, when and why:

- The CPS failed to pursue appropriate charges against child abusers and potential perpetrators;
- The CPS, for reasons of expedience, proceeded with lesser or alternative offences, when stronger charges were available;
- Prosecutorial caution, cultural sensitivities or institutional risk-aversion influenced charging decisions;
- Senior decision-makers knowingly authorised inadequate charges despite available evidence;
- Failures to prosecute robustly or deliver inadequate sentences enabled continued abuse.

22. We would highlight that public confidence depends on visible, enforceable accountability, not the closed door internal administrative discipline handed out by the very institutions responsible for the current collapse of public trust.

## **Racial Sensitivities, Ethnicity, Religion and Institutional Failures**

23. Baroness Casey, in her National Audit, made clear that there is evidence of authorities ignoring abuse because the abuse perpetrators within the gangs were largely of Pakistani Muslim origin (or other distinct group such as asylum claimants) and officials feared recording such data for fear of accusations of racism.
24. Thus, the sensitivities of adults were put above the safety of children.
25. We rely on the following paragraphs from Baroness Casey's report:

*We need more maturity and honesty in debate about the ethnicity of perpetrators of group-based child sexual exploitation. Assertions that the majority of child sexual abuse offenders are White, even if true, are at best misleading. In a population with over of 80% of people of White ethnicity it should always be a significant issue when people from a White background are not in the majority of victims or perpetrators of crime. It should also be a significant issue when any community or social group appears disproportionately over-represented as victims or perpetrators of crime. In such cases, the underlying factors that have contributed to that situation deserve investigation.*

*The people who downplay the ethnicity of perpetrators are continuing to let down society, local communities and victims – past and future - by not looking harder at the nature of offending in order to better understand it and better prevent it. Ignoring the issues, not examining and exposing them to the light, allows the criminality and depravity of a minority of men to be used to marginalise whole communities rather than opening up the possibility of understanding it better.*

*They are also providing ammunition to a minority of people who pretend to be on the side of victims but are using them – and others who genuinely care about the plight of victims and the need for tougher action - to spread division and hate across communities. As Gabrielle Shaw of the National Association for People Abused in Childhood was reported to say in January 2025*

*“The weaponisation of people’s trauma is reprehensible. Someone’s trauma should not be used to score political points, or as clickbait.”*

26. Historically, we now know from Baroness Casey, that data has deliberately not been gathered on the ethnicity, religion or cultural background of perpetrators.
27. The Secretary of State in response to Baroness Casey’s report purports to have taken steps on the collection of ethnicity data for all CSA and CSE suspects (Recommendation 4).
28. The Government has also purported to agree to implement Recommendation 5 of Baroness Casey’s Audit: Mandatory sharing of information should be enforced between all statutory safeguarding partners in cases of child sexual abuse and exploitation.
29. The Government’s response sets out inter alia as follows: *‘We will work across government to engage with relevant inspectorates to ensure that the new multi-agency information sharing duty is embedded in the relevant accountability frameworks’.*
30. In these circumstances it is entirely unclear whether agreeing to share data across all safeguarding agencies will involve compiling a core data set. It is also unclear whether the Secretary of State now considers that Recommendation One of the IICSA will be implemented.
31. Therefore, the ToR must empower the Inquiry to be able to examine why and report publicly on:
  - Whether data collection failures were influenced by racial sensitivities;
  - Whether concerns about “community relations” contributed to investigative and prosecutorial inaction; and

- Whether there was deliberate avoidance in failing to acknowledge patterns involving Pakistani Muslim groups in the organised sexual abuse and exploitation of children.
  - The extent to which race, religion, culture or political sensitivity played a role in cover-ups by councils, police or prosecutors.
32. The ToR must afford the Inquiry the ability, in its final report, to make findings on the collection of data on the ethnicity and religion of victims and perpetrators of sexual crimes AND to allow the Inquiry to make clear recommendations requiring authorities and agencies to collect reliable data on all relevant factors, including ethnicity and religion in order to effectively detect and prevent organised child abuse. This point was backed unanimously by the TMOF Survivor Panel during our meeting with you.

### **Causal Factors and Targeting of Victims**

33. The Consultation Document suggests consideration of prevalence of organised abuse, but does not require examination of causation.
34. Court transcripts and social service records show evidence that children were targeted because they were 'white'. The Inquiry must therefore investigate:
- Whether/why race or religion were causally relevant factors in victim selection;
  - Whether failures to intervene stemmed from misplaced sensitivities around race;
  - Whether perpetrators were protected due to perceived "brotherhood" within shared cultural or religious groups;
  - Whether institutional fear of accusations of racism led to systemic paralysis across councils, police and prosecutors.

35. Without causation being examined honestly and transparently, the Inquiry cannot reach reliable conclusions. The absence of reliable findings will undoubtedly lead to a loss of public confidence in the Inquiry and its final report. Most importantly, children will continue to be failed.
36. We recognise that the issues the Inquiry is asked to investigate are potentially highly contentious. Indeed it is the contentiousness of these issues that have caused this Inquiry to be established. The ToR must provide the Inquiry with the ability to follow where the evidence leads, regardless of whether the evidence is difficult or challenging to sensibilities of any group.
37. The ToR must provide the Inquiry with both the ambit and direction to investigate and make findings on ALL of the relevant issues.
38. The Chair must also commit herself and her panel to producing a final report that grapples fully with the issues and unflinchingly reports on the full truth.

### **Independence from Local Authorities**

39. The ToR must not allow any local authority under scrutiny to influence the scope, restrict evidence or veto lines of investigation.
40. The perception of ongoing 'secrecy' has been one of the main reasons survivors continue to be traumatised for many years, even long after their actual abuse has ended. Many survivors report that the lack of honesty, and the cover ups they have fought against, have compounded their trauma immensely, often even more so than the actual abuse itself.
41. This was a clear theme the Inquiry Chair and panel will have taken from the meeting with survivors on 20 February 2026. This practice must end.

42. The Inquiry must exercise the full powers at its disposal under the Inquiries Act to compel disclosure and cooperation and engagement from institutions, to ensure that:

- Councils and agencies are prevented from withholding documents or cooperation;
- Area selection criteria are not limited or decided solely between Government and the Inquiry; and
- Guarantee that survivors are the primary voice heard in determining the scope.

### **National Scope and Cross-Authority Failures**

43. The sexual exploitation of children occurred, and continues to occur, across multiple local authorities. Children were and are moved and trafficked between areas.

44. The Consultation Document acknowledges that exploitation does not necessarily occur in a single location, yet references local inquiries. It is imperative that these local inquiries do not take place in isolation.

45. The ToR must provide the Inquiry with the ambit and power to undertake the wider national investigations necessary to reliably determine the national picture.

46. Matters the Inquiry must engage with include:

- Examining failures in information-sharing between authorities.
- Examining and reporting on why different police forces still do not have effective 'joined up intelligence systems/computer systems' that actually 'speak to each other', even though this was identified as a key reason for the failures in the Soham case over 20 years ago. It seems likely that the Inquiry must address with recommendations on investing in up-to-date

technology systems to finally rectify this unacceptable weakness in our investigations. This will take investment, but cost should not be used as an excuse to fail to protect future generations of our children.

- Investigating systemic safeguarding breakdowns across borders.
- Examining failures by police, councils and the CPS across jurisdictions to coordinate effectively.
- Ensuring that exclusion of local authority areas is justified transparently, evidence based and has buy-in from survivors. This issue (the cherry picking of investigation areas) was a primary concern of all survivors we brought to meet you. The survivor attendees demand that the Inquiry commit to a whole of England and Wales investigation, because it is understood that gangs' 'traffic' their victims throughout the UK, using a wide network of towns and cities, often linked via family networks. It is one of the key features of the gang 'modus operandi' and therefore selecting discrete areas will by its very design, negatively impact the Inquiry's ability to uncover the full picture of how these crimes were perpetrated, investigated and prosecuted. The Consultation Document includes a statement that local and national recommendations of the Inquiry should be informed by consultation with the authorities most likely to be charged with their implementation. There will be cases where these are the very agencies and authorities who have failed victims and survivors for decades. The inclusion of effective governance and review mechanisms should be put in place to ensure recommendations are implemented.

## **Organised Crime and Overseas Trafficking**

47. The Inquiry should be empowered to examine organised crime elements, including cross-border networks and evidence of trafficking to Pakistan, and other countries, within long-running grooming operations.

## **Judicial Sentencing and Mitigating Factors**

48. You heard from the TMOF Survivor Panel that often serious rape and exploitation allegations were downgraded, and prosecutorial decisions failed to reflect the gravity of their sexual exploitation and abuse by organised networks of predators.
49. Court transcripts reveal instances where judges referenced defendants 'standing within their communities' as mitigating factors.
50. The Inquiry will become aware that little attention is paid to the background and vulnerability of the victim in sentencing.
51. The final ToR must therefore permit and empower the Inquiry to investigate such considerations by the Courts, which appear, on their face, to be wholly unacceptable.
52. The Inquiry must examine:
- Why such considerations are permitted as a material factor in sentencing;
  - Whether there are other inappropriate considerations taken into account and relied upon by the Courts when mitigating sentences;
  - Whether inappropriate cultural differences influenced sentencing; and
  - Whether systemic bias undermined justice for victims.

### **Governance and Relationship with Operation Beaconport**

53. The Consultation Document suggests that the Inquiry will work in collaboration with Operation Beaconport, led by the National Crime Agency (NCA).
54. The explicit nature of this relationship must be clearly defined to safeguard independence, transparency and prosecutorial integrity.

### **Survivor Support, Safeguarding and Funding**

55. The Terms of Reference must require engagement with expert survivor support charities such as TMOF.

56. It must be appreciated that this Inquiry would not have been established but for the campaigning work of The Maggie Oliver Foundation, its founder and Chair, Maggie Oliver and others.

57. The Inquiry must place at the heart of its work:

- Guarantees of trauma-informed safeguarding;
- Protections for survivors and their families;
- The allocation and publishing of a ring-fenced budget for survivor support and grant them core participant status;
- Engagement with families and advocates, not survivors alone. This engagement should not just be in evidence gathering but in the continuing governance of the Inquiry; and
- Engagement with advocates and experts working alongside survivors of child sexual abuse and exploitation who will have insights into potential solutions to prevent these failures happening again.

58. Our team at TMOF would welcome the opportunity to discuss their insights with the Inquiry Chair and the panel members.

### **Transparency and Updates**

59. During our meeting on 20th February, the TMOF Survivor Panel expressed deep frustration and anger at the lack of communication from the previous 'attempt' to instigate an Inquiry last year, many feeling it was 'half-hearted'. That caused huge anger and mistrust.

60. Trust and confidence in the Inquiry cannot be a “given”; it is something that must be earned, and re-earned over time and through actions.

61. The Inquiry therefore must:

- Provide regular updates to Parliament;
- Provide structured in-person updates to survivors/core participants via regular online and in person meetings; and
- Work with organisations such as TMOF to build trust and transparency and ensure survivors are not isolated.

### **Time Restrictions**

62. Limiting the Inquiry to cases post-1 January 2000 is inadequate.

63. The Inquiry must be empowered to investigate high-profile cases prior to 2000 where necessary to understand systemic patterns.

### **Publication and Protection from Political Delay**

64. The ToR (when published) must explicitly require publication of the final report in March 2029 as planned, without any delay for any reason, including one linked to electoral cycles.

65. Urgency must be emphasised.

66. The mere fact of the creation of this Inquiry should not be reason to further delay implementation of the recommendations of IICSA, as again recommended by Baroness Casey. As you are aware, on 5<sup>th</sup> March the High Court granted The Maggie Oliver Foundation permission to bring a Judicial Review against the

Government in relation to their non implementation of IICSA's recommendations, and failure to even publish a timeline for their implementation. There is a very real fear among survivors that they will, once again, be asked to re-live their most traumatic experiences yet see no action or change as a result.

67. It is open to the Chair, in the light of the Government acceptance of the recommendations of Baroness Casey (who predicated her recommendations on the implementation of the IICSA recommendations) to call publicly upon the Government to not set a clear timetable for implementation of the 20 recommendations of IICSA.

### **Survivors and Victims Charter**

68. The Consultation Document includes a commitment to a Charter for Survivors and Victims on how they will be included in the Inquiry but does not state how the Charter will be developed. It cannot be imposed top down.

69. The ToR must state that the Charter will be informed by survivors and victims, who will be involved in the Inquiry. The Charter must include a commitment to treating survivors and victims in a trauma-informed, victim focused, non-judgmental manner.

70. Survivors and Victims must be given clear channels to escalate their concerns when the ToR or Charter are not being followed or abided by.

71. There must be clear safeguarding processes in place to support survivors and victims as part of the commitment to their wellbeing in this process.

72. There must be a commitment to providing support to the families, friends and support network of the survivors and victims involved who are by extension connected to the Inquiry.

## **Other considerations and next steps**

73. Howe + Co, our legal representative, have written to you in detail about a number of these matters. A further copy of that letter, sent out on our behalf, is attached to these observations.
74. The “trust deficit” described in that letter, is very real, and has been caused by previous governments (of every party) having promised implementation of IICSA recommendations, but not doing so. As a result, trust and confidence need to be rebuilt through the meaningful engagement and participation of survivors and victims in the Inquiry.
75. Whereas we would also welcome the opportunity to contribute to the Inquiry by sharing key recommendations based on our extensive experience, knowledge and input from our Survivor Panel, such meaningful participation cannot occur without survivors having access to expert legal advice and representation.

## **Funding**

76. Given the complexity of the Government’s proposals, and the importance of the issues, it is vital that funding (under Section 40 of the Inquiries Act) is provided at the earliest possible stage for lay survivors including charities such as TMOF; so that they can contend on a level playing field with institutions who will engage with this Inquiry who will have, in effect, access to unlimited legal and departmental support.
77. The Inquiry must appreciate that victims and survivors of organised abuse experience, daily, the most serious challenges and disadvantages. Therefore, although they are the most important persons before the Inquiry, they have the least ability to meaningfully engage with it.

78. We submit that such funding can and should be made available prior to the settling of the terms of reference.
79. This approach would be consistent with the approach taken by Sir Moore-Bick Chair of the Grenfell Tower Inquiry and more recently by Sir Gary Hickinbottom (Chair of the current Partick Finucane Inquiry), both of whom granted funding, under Section 40 of the Inquiries Act, for expected core participants to be assisted in providing their views on the draft terms of reference.
80. Furthermore, we ask the Chair to seek a commitment from the Secretary of State that when she publishes her Notice of Determination under Section 40(4) of the Inquiries Act 2005, that this Determination provides the Chair with:
- Wide discretion to grant legal expenses funding for survivor core participants,
  - That this is not means tested, and
  - That any award will be for the duration of the Inquiry.

## **Conclusions**

81. The above represents The Maggie Oliver Foundation and The Maggie Oliver Survivor Panel's initial observations on the Consultation Document, including those matters raised in the meeting of 20<sup>th</sup> February between these parties.
82. We reserve the right to make further and better observations on behalf of the survivors we represent.
83. We repeat our preliminary issues of concern as set out above and seek an early response to them.

**The Maggie Oliver Foundation and The Maggie Oliver Foundation Survivor Panel**



**Drafted with the assistance of Howe + Co Solicitors**

**6 March 2026**