

**IN THE HIGH COURT OF JUSTICE  
ADMINISTRATIVE COURT**

**BETWEEN**

**THE KING  
ON THE APPLICATION OF  
STEPHEN MORRIS OF THE WORKERS OF ENGLAND UNION (1)**

**THE ENGLISH DEMOCRATS (2)  
(CO. REG. NO. 6132268)**

**Applicants**

**-and-**

**RT HON YVETTE COOPER MP  
SECRETARY OF STATE FOR THE HOME DEPARTMENT (1)**

**JESS PHILLIPS MP  
MINISTER FOR SAFEGUARDING AND VIOLENCE  
AGAINST WOMEN AND GIRLS (2)**

**Respondents**

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**GROUND OF APPLICATION  
AND  
STATEMENT OF FACTS**

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**The Applicants**

- A. The First Applicant, Mr Stephen Morris, is a suitable Applicant as a concerned member of the public and also as the General Secretary of the Workers of England Union whose aim is the welfare and protection of

Workers and their families in England and both are very concerned about this matter.

- B. The Second Applicant, the English Democrats, has a long track record of campaigning for England and English issues and representing the concerned public in England. This scandal consists of up to 50 towns and cities across England and concerns anti-English discrimination, not only by the gang members and their paying “clients” and other criminals but also the anti-English discrimination of multiculturalist officials and politicians and police officers. It is therefore asserted that the premier campaigners for the English are the Applicant.

### Context

1. As the TV journalist, Charlie Peters of GB News has said:-

*“The grooming gangs scandal is the gravest atrocity in modern British history, possibly the worst since the Second World War.*

*In cities, towns and communities across Britain, thousands of children — predominantly white, working-class girls — were systematically groomed, abused, raped, trafficked, tortured and defiled by thousands.*

*First reports of this abuse by predominantly Pakistani men were made in the 1960s in Bradford. Newspaper reports resurfaced again in the 1970s, this time in Rotherham. Then the trail went cold, only for reporting on this form of child abuse to return to media coverage in the late 1990s.*

*Ann Cryer, the Labour MP for Keighley, raised concerns about Asian men targeting girls outside school gates in 2002. She was derided as a racist.*

*But the horrendous pattern she detected in her once-gentle corner of West Yorkshire soon spread across the country.*

*In every major town and city across Britain, children were being groomed by gangs of Pakistani men to be used in the most horrendous forms of child abuse. Their desecration went beyond the horror of rape and sexual assault: they were often tortured, trafficked, violently beaten, branded with the initials of their rapists, treated like meat, subjugated in the most reprehensible conditions, plied with alcohol and drugs, and*

*generally subjected to a level of treatment beyond the imagination of even the most disturbed mind.*

*Only a handful of reports have ever been launched into this terrifying pattern of abuse. They have focussed on Rotherham, Rochdale, Telford and Oldham.*

*In each of these areas, the same accusations of racism that Ann Cryer was subjected to has prevented people from being confident and free to raise concerns.*

*In all of these areas, police officers, council officials, social services and elected politicians were terrified of confronting the rapists because they prioritised protecting community cohesion over securing the safety of thousands of children.”*

2. It is in this context that the Greater Manchester Independent Assurance Review in relation to Child Sexual Exploitation published its review in 2022. Oldham Council had made numerous calls to the Home Office asking for a wider Public Inquiry into Child Sexual Abuse and resolved to do so again at a Council meeting on the 10<sup>th</sup> July 2024, in which the resolution was unanimous. The resolution was that the Chief Executive should request the Home Secretary to order a Public Statutory Inquiry into Child Sexual Exploitation in Oldham, such Inquiry under the Inquiries Act 2005, Chapter 12.

### **The Challenged Decisions**

3. The decisions are refusals by the Home Secretary and the Minister for Safeguarding and Violence Against Women and Girls to order a National Public Statutory Inquiry and instead to propose local non-Statutory Inquiries. A decision was announced on or about the 16<sup>th</sup> January 2025.

The refusal is continuing and there have been two further acts of explicit refusal on the 8<sup>th</sup> April 2025 and on the 9<sup>th</sup> April 2025.

## The Law

4. The relevant part of the Act states:-

### **Inquiries Act 2005**

#### **1. Power to establish inquiry**

- (i) A Minister may cause an inquiry to be held under this Act in relation to a case where it appears to him that:-
  - (a) Particular events have caused, or are capable of causing, public concern, or
  - (b) There is public concern that particular events may have occurred.
- (2) In this Act “Minster” means:-
  - (a) a United Kingdom Minister;
  - (b) the Scottish Ministers;
  - [ba) the Welsh Ministers;]
  - (c) a Northern Ireland Minister
- (3) References in this Act to an inquiry, except where the context requires otherwise, are to an inquiry under this Act.

## Decision History

5. In considering causing an inquiry to be held it is submitted that the Minister shall consider only 1.(i) (a) and (b) and not any additional irrelevant considerations i.e. Wednesbury reasonableness. It is also submitted that as this is the most appalling example of 1.(i) (a) and (b) that it is irrational to conclude that an Inquiry under the Act should not be set up.
6. In response to the Oldham Council request the Home Secretary delegated the duty of responding to the Minister for Safeguarding and Violence Against Women and Girls, Jess Phillips MP.
7. After a delay from the 17<sup>th</sup> July to the 29<sup>th</sup> October in responding, Jess Phillips MP refused the request of Oldham Council. It is submitted in doing so she both personally and as the Deputy of the Home Secretary, was both irrational and “Wednesbury” unreasonable in not considering

factors which should have led her to order the requested Inquiry and also in considering factors which were not relevant to the Minister's statutory duty, in particular it is asserted that the Minister's motivation was improperly influenced by fear that a full Statutory Inquiry would uncover evidence of a wrong-doing by Labour Councillors, MPs and Ministers, as well as Police Officers, Social Workers, Council Workers and the CPS.

### **Public Concern**

8. Since Jess Phillips' letter of the 29<sup>th</sup> October 2024 became publically known there has been widespread criticism of her, the Home Secretary and the Home Office and the Government generally in refusing to do a National Public Inquiry. That criticism includes famously that of Elon Musk, of X (formerly Twitter), and many, many others, including many Parliamentarians and the Leader of the Conservative Party, the Rt Hon Kemi Badenoch MP and many journalists and on social media.
9. As one of the many calling for a full Public Statutory Inquiry, James Esses wrote:-

*"The idea that radical ideologues have influenced the Home Office's thinking on the rape gangs is deeply concerning and helps to explain why no new inquiry is forthcoming."*

*Back in 2022, for example, when the Independent Inquiry into Child Sexual Abuse (IICSA) was running, this was a theme that emerged repeatedly.*

*The Secretary to the Inquiry, John O'Brien, said:*

*"We need to break the culture where people are worried that they might be accused of being racist just because they record factual information".*

*IICSA went on to find that there was a "widespread failure to record the ethnicity of perpetrators and victims of child sexual exploitation".*

Furthermore, it concluded that:

*“It is unclear whether a misplaced sense of political correctness or the sheer complexity of the problem have inhibited good-quality data collection generally and on ethnicity more specifically”.*” - James Esses in Professor Matt Goodwin’s Substack

As Dominic Frisby writes:-

*“These white girls were the victims of racism. And sexism. And paedophilia. And rape. And GBH. And, in some cases, murder.”*

They were targeted because of their race. They were called “white whores” “white c\*nts,” and “white slags,” and no amount of contempt was enough for them.

The government is still continuing to refuse to cause a national statutory inquiry to be set up into the many tens of thousands of young white English girls who were groomed and raped by Pakistani men in the UK, and who were failed by police, local authorities and social services.

There could be no greater example of the concerns stipulated in Section 1. (i) (a) and (b) and it is irrational in these exceptional circumstances to decide not to exercise the power to establish an Inquiry.

10. On Sunday, 19<sup>th</sup> January the Sunday Telegraph Editorial read as follows:-

***“Police Grooming Gang failures Shame Britain”***

*“With each passing day, Sir Keir Starmer’s obstinate refusal to grant a full national inquiry into the grooming gangs scandal becomes harder to explain. The failures that allowed these criminals to operate untouched for years in towns across the country came from a disturbingly wide range of agencies, from the Crown Prosecution Service and local authorities to police forces.*

*The failures of this last group are perhaps the most troubling – and the most difficult to crack. An unpublished 2022 report from the Independent Office for Police Conduct (IOPC), seen by The Telegraph, shows that*

*South Yorkshire Police, the force responsible for protecting girls in Rotherham from grooming gangs, failed to do so as it prioritised addressing other crimes.*

*The report reveals that “policing priorities were clearly defined”, with dealing with child sexual exploitation (CSE) left by the wayside. Instead, driven by “performance indicators” set by the Labour government of the day, the force focussed its efforts on crimes such as burglary and robbery. Officers on the force believed that “one reason that CSE was never a high priority” was that their “performance” was not “assessed” based on it.*

*Among the report’s findings were that from as early as 2001 named perpetrators and their victims were discussed at meetings, but “seemingly dismissed”. They would go on to abuse children until convicted in 2016.*

*Unsurprisingly, the conclusion of the report was that senior officers had failed in their duty to protect children from harm. Yet South Yorkshire Police rejected these findings, while Jayne Senior, the complainant at the heart of the report, alleges that she felt under pressure from the IOPC not to talk publicly about its findings.*

*It is difficult to think of a better summary of the dynamics at play in this scandal: state authorities made aware of atrocities taking place that they were responsible for preventing, failing to take action, and then other bodies responsible for examining their conduct refusing to make that failure public.*

*A handful of underfunded local authorities will not reveal the full extent of the state’s failures across the breadth of the country, or their underlying causes. Without the power to compel witnesses to appear, or the resources necessary to investigate each agency and its failures, from police forces to the Home Office, they will prove inadequate to the task in hand.*

*This may be preferable for those officials who were, in one way or another, culpable for these failures, or who took part in what look like*

*efforts to cover up the scandal. It would however, be intolerable for the public.” - Sunday Telegraph Editorial*

11. Patrick O’Flynn, the journalist and former MEP wrote:-

*“It has been generally admitted that criminal justice professionals bent over backwards to deny key facets in order to protect “community relations”. Police, social services, prosecutors have been exposed for engaging in politically correct groupthink that sought to ignore, marginalise and otherwise downplay mountains of evidence about abhorrent behaviour by hundreds of men simply because their Muslim, Mirpuri, Pakistani backgrounds made prosecuting them “awkward”.” - Patrick O’Flynn, Substack*

James Esses also wrote:-

*“We witnessed this, for example, in the Home Office Report, from 2020, which sought to challenge the notion that ethnicity or religion are correlated with the rape gangs.*

*Yet, there are serious question marks regarding the impartiality of that report.*

*The research itself was undertaken by a certain Dr Ella Cockbain and Dr Waqas Tufail, both of whom can be described as ideologues, not neutral analysts.*

*Dr Tufail, an academic from Leeds Beckett University, specialises in “decolonising criminology” —a term taken from critical race theory, a highly political and deeply divisive perspective which views all Western nations as racist.” – James Esses – Professor Matt Goodwin, Substack*

12. The depth of depravity and anti-White racism plumbed by the mainly Muslim Pakistani heritage (but in some cases Afghan and Somali), child rape and prostitution gangs is exemplified in the sentencing comments of His Honour Judge Peter Rook as follows as regards a gang operating in Oxford:-

*“53) You, Mohammed Karrar, prepared her for gang anal rape by using a pump to expand her anal passage. You subjected her to a gang rape by five or six men (count 30). At one point she had four men inside her. A red ball was placed in her mouth to keep her quiet. Not only were you both involved in the commercial sexual exploitation of GH, you also used her for your own self-gratification. You both raped her when she was under 13. When she was very young, although it is not clear whether she was under 13, you both raped her at the same time (oral and vaginal/anal). It happened on more than one occasion (Count 28).*

*54) Mohammed Karrar, on one occasion when GH was 12, after raping her, she threatened you with your lock knife. Your reaction was to pick up a baseball bat with a silver metal handle, strike her on the head with it, and then insert the baseball bat inside her vagina. You treated her as if she was your commodity. You branded her (with your initial near her anal passage) using a hot hair pin. If GH did not comply with your wishes, if you were not with other people, you would lose your temper with her. As part of the grooming, you would provide her with crack cocaine and you injected GH with heroin on numerous occasions (Count 40).”* From Dominic Frisby’s Substack.

13. The suspicion of impropriety is widespread. As James Esses also wrote:-

*“The Labour government, meanwhile, have repeatedly ruled out launching a statutory national inquiry into the rape gangs while, as we saw recently, Labour councillors in local areas like Bradford are ruling out independent local inquiries, no doubt afraid of what might be revealed if people start to search for the truth. Might they find, as in Oldham, that local Labour officials are allegedly complicit in the rape gangs?”*

*Yet, when we consider other inquiries in existence, it becomes clear there are serious double standards and a wholly improper failure to consider the requirements of the Inquiries Act 2005.*

*Political correctness and an obsession with Diversity, Equality, and Inclusion (DEI) are facilitating the Pakistani Muslim child rape-gang epidemic in the United Kingdom.” – James Esses – Professor Matt Goodwin, Substack.*

### **January Decision**

14. In an implicit admission of the level of public concern, as the BBC reported:-

*“Despite their refusal of the public’s central demand for a Statutory Inquiry, on or about 16<sup>th</sup> January the Home Secretary announced a new national-level “rapid audit” of grooming gangs, plus up to five new local inquiries.*

*The national three-month audit led by Dame Louise Casey will look at “cultural and societal drivers” of child sex abuse, Cooper says.*

*The government will also support “victim-centred” local inquiries in Oldham and up to four other “pilot” areas.*

*Cooper says “effective local inquiries” can deliver more answers and change than a “lengthy nationwide inquiry”.*

But Shadow Home Secretary Chris Philp MP called the plan “wholly inadequate”, and reiterates the Conservatives’ call for a “proper, full, national public inquiry”.”

The problem is that such Inquiries do not have any of the powers to compel witnesses and evidence which is necessary in cases where there is serious persistent criminality and where there has been huge and unforgiveable neglect of duty by large numbers of public servants. The

ministerial responses so far are legally inadequate but show that Ministers are very aware of the extensive public concern over this horrific State failure and criminality. It is submitted that an order requiring the setting up of a Statutory Inquiry is needed to answer the many and continuing requests and demands for one and to provide the evidence which will enable justice to be done against the perpetrators and collusive or corrupt public servants and for the many tens of thousands of victims.

The extent of the child rape and pimping gangs activities extends as GB News investigations have found to at least 50 cities and towns in England. It appears to have been going on for 20-30 years and has ruined the lives of at least 100,000 girls. Sarah Champion, the Labour MP for Rotherham, has said she thinks it might be 1,000,000 girls. It is asserted that a reasonable and conservative estimate of the number of victims is 250,000. When it is considered that there is not only the actual gang members, but all their many thousands of paying "clients" and the collusion of thousands of officials, social workers, police officers and politicians, it is no exaggeration to say that this is probably the greatest criminality in English history. It is therefore irrational to set up Statutory Inquiries for lesser matters of public concern but not for this much greater cause.

As Rupert Lowe, the MP for Great Yarmouth, has said:-

"The mass rape of young working class white girls by mainly Pakistani men on an industrial scale, that is a rotten stain on our country's history. I do not say this lightly but it makes me ashamed to be British."

In addition Professor David J Betz, the Professor of War in the Modern World at Kings College, London, has argued that the UK is at risk of descending into Civil War because, in part, that this scandal and the official complicity in it is totally corrosive of the legitimacy of the UK Government and of the UK authorities generally.

It follows that this Application should not just be viewed as a technical legal argument but as a matter of the highest national importance.

**Statement of Truth**

I believe that the facts stated in these Grounds of Application are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.

Signed ..... *SM* .....  
Stephen Morris

Dated ..... *6th MAY 25* .....

Served by the Applicants of Quires Green, Willingale, Ongar, Essex, CM5 0QP, where they will accept service.

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**Respondents**

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**GROUND OF APPLICATION  
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STATEMENT OF FACTS**

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