

UNITED KINGDOM

Patrick Finucane's killing: Official collusion and cover-up

Amnesty International Concerns

“Where the state’s own authorities are concerned we must be as sure as we can of the truth” -- Prime Minister Tony Blair on the need for a full-scale judicial inquiry into the killing by the army of 13 civilians on “Bloody Sunday” in 1972

Amnesty International welcomed the Prime Minister’s statement when it was made, but believes it should apply equally to the government’s responsibility to examine substantial evidence of official collusion in the killing of the lawyer, Patrick Finucane. Patrick Finucane was shot dead in February 1989 by Loyalist paramilitaries¹ in Northern Ireland; evidence has emerged of collusion between the paramilitaries and police and military intelligence agents in the killing. It is Amnesty International’s firm belief, and one that the organization has reiterated to the government on many occasions, that evidence of collusion can only be fully and impartially investigated by a judicial inquiry which has full powers of subpoena of witnesses and disclosure of documents.

The government’s failure so far to establish an independent judicial inquiry into claims of collusion fuel the perception of a continued cover-up of official involvement in the killing. The cover-up itself requires a separate focus and should also be investigated.

The Killing of Patrick Finucane

Patrick Finucane was a prominent criminal defence and civil rights lawyer; his was one of the leading law firms in the 1980s in Northern Ireland acting in defence of those detained or charged under emergency legislation. He was instrumental in raising fair trial issues in the courts, arguing against practices which were in violation of international human rights standards.

He was shot dead by two masked men on 12 February 1989 in front of his wife and his three children at their home in Belfast, Northern Ireland. He was shot 14 times, including at close range. His wife, Geraldine, was also injured in the attack, most likely by a ricochet bullet. Responsibility for the killing was claimed by the armed Loyalist group, the Ulster Defence Association/Ulster Freedom Fighters (UDA/UFF); the organization stated that he had been an “IRA member”. This claim was denied by family and friends, as well as by official police statements.

¹ Loyalist paramilitary groups are armed groups which fight to maintain the union of Northern Ireland with Great Britain. Their membership comes mainly from the Protestant community. Republican paramilitary groups fight for a united Ireland; their membership comes mainly from the Catholic community.

One of the weapons used in the attack had been stolen from British Army barracks in 1987 by a soldier from the Ulster Defence Regiment (a local British Army regiment). The soldier was subsequently jailed for the theft.

Evidence of official collusion

Soon after the killing, claims of official collusion began to emerge. Those claims have multiplied through the years and have built up into a kaleidoscope involving various state agencies. In addition, the government's continued failure to institute a full judicial inquiry into all the allegations, after eleven years, only serves to underline the belief that the government is afraid of what such an inquiry would reveal: the extent of its own agencies' involvement in the murder. The following is a brief list of the evidence of collusion that has emerged to date:

- a) Republican suspects, detained in interrogation centres, stated that detectives alluded to their lawyer, Patrick Finucane, in derogatory ways, and in some instances communicated through them death threats to Patrick Finucane.
- b) Loyalist suspects, detained in interrogation centres, stated that detectives had told them that Patrick Finucane was "the brains behind the IRA" and was "helping to keep IRA gunmen out of prison" and had suggested that something should be done about him.
- c) A few weeks before the murder, a Home Office minister, Douglas Hogg, stated in Parliament that "some lawyers were unduly sympathetic to the cause of the IRA". He refused to retract that position, even though he was alerted to the dangers of making such a statement.
- d) Recent statements by Sir John Hermon², former Royal Ulster Constabulary (RUC) Chief Constable, attacking the integrity of Patrick Finucane imply that senior police officers had briefed Douglas Hogg before he made that statement. This confirmation of the police view, at the highest levels, of Patrick Finucane at that time would appear to support the claims made by Loyalist suspects about what they were told by detectives.
- e) Before Patrick Finucane's death, the incidence of threats escalated, both in terms of abuse directed against him via clients during interrogation, and in telephone calls to his home.
- f) His brother, Martin, stated that police roadblocks had been in place in close proximity to Patrick Finucane's home up to an hour before the murder; the appearance of these roadblocks would appear to have been unusual; an inquiry would need to determine why

² Sir John Hermon, the then Chief Constable, stated in an interview with the *Daily Telegraph* on 10 May 1999, that Patrick Finucane "used his position as a lawyer to act as a contact between suspects in custody and republicans on the outside". He also stated that Douglas Hogg's "statement was based on fact". At the time, an Amnesty International press release stated that it believed the former Chief Constable's "scandalous attack" was an attempt to dissuade the Northern Ireland Law Society from calling for a judicial inquiry into the killing of Patrick Finucane. (AI Index: EUR 45/27/99).

they were put in place and why they were removed, and whether the security forces were told to clear the area so that the gunmen could have unfettered access to and from the house.

g) A recent book by Nicholas Davies³ states that “restriction orders” were frequently issued by one arm of the security forces to warn all others to stay away from a particular area during a particular time because of sensitive operations. These restriction orders were obeyed.

h) Brian Nelson served as the intelligence officer for the Ulster Defence Association (UDA) between 1987 and 1990; at the same time he worked as an informer for the Force Research Unit (FRU), a clandestine operation within military intelligence⁴. Nelson alleged that he had directly assisted in the targeting of Patrick Finucane, and that he had warned his army handlers a few months in advance that Finucane was being targeted. He was never charged in connection with the murder; nor were the army handlers.

i) Nicholas Davies, in his book, claims that Patrick Finucane had first been singled out for attention by the Loyalists 16 months previous to his killing, and that military intelligence had been informed at that time, as well as at later stages. He also claims that there was very close co-operation and exchange of information between military intelligence, Special Branch and MI5⁵, in particular after the Brighton bombing of 1984 which killed and injured leading members of the Conservative Party and their relatives.

j) A former army intelligence officer in the 1980s, under the pseudonym of Martin Ingram, has reportedly stated that army intelligence had been warned on three separate occasions that Patrick Finucane was going to be killed.

³ Nicholas Davies, *Ten-Thirty-Three: The Inside Story of Britain's Secret Killing Machine*, November 1999.

⁴ It has been revealed that the Force Research Unit recruited Brian Nelson in 1987 and infiltrated him into the UDA. His role in the UDA was to ensure that “only legitimate targets” (i.e. IRA members) were killed. Files which have been disclosed detail accounts of meetings between Brian Nelson and his army handlers, and demonstrate the complicity of the handlers in killings. One account, dated 3 May 1988, stated that the Loyalists’ “targeting has developed and is now more professional”. The army’s records reportedly show that Brian Nelson was involved in at least 15 murders, 15 attempted murders and 62 conspiracies to murder (See *Sunday Telegraph*, 29 March 1998).

⁵ MI5, the counter-intelligence agency for internal security, has been the central co-ordinating body for intelligence operations in Northern Ireland, coordinating the work of its own agents with that of military intelligence and police intelligence, including Special Branch of the RUC.

k) Brian Nelson was convicted in January 1992 of various charges including conspiracy to murder.⁶ At the trial, Colonel "J", a senior military intelligence officer, told the court that military intelligence shared information received from Brian Nelson with the RUC. However, the RUC subsequently denied ever receiving information from military intelligence that Patrick Finucane had been targeted. What the RUC also did not admit to was receiving information from its own informers that Patrick Finucane was being targeted.

l) On 24 June 1999 William Alfred Stobie, a former RUC informer, was charged with the murder of Patrick Finucane. William Stobie was a former soldier and an active member of the UDA, who informed Special Branch of planned activities of the UDA. In his statement to the court William Stobie denied the charge of murder. He said that as a police informer for Special Branch he had informed Special Branch on the night of the death of Patrick Finucane on two occasions by telephone that "...a person was to be shot". However, he stated that at the time he had not known the identity of the person. William Stobie's solicitor told the court that Stobie had been "a paid Crown agent acting on behalf of the police from around 1987 to 1990. On at least two occasions he gave police information before this murder that clearly was not acted upon. He also gave police information after the murder about the murder weapon." According to an interview given by Stobie to the *Sunday Tribune* in 1990 (but not published until the end of June 1999), Stobie had been charged with possession of weapons but the trial was abandoned in 1990 after he threatened to reveal that he had warned the RUC Special Branch before the killing of Patrick Finucane. William Stobie also told the *Sunday Tribune* that he had given the RUC enough information and time to save the solicitor's life. When he had complained about their inaction, Stobie says he was told that "he [Finucane] was just an IRA man". In addition, no attempt had been made to seize the murder weapons.

m) At a later stage in proceedings⁷, it emerged that William Stobie had been arrested and interrogated on 32 occasions in September 1990 and that he had given details at that time about his involvement with Special Branch and about how he had disposed of at least one of the weapons used in the killing. The failure to bring a prosecution in 1990 raises serious questions about the actions of the DPP's office in this case.

⁶ Brian Nelson was arrested as a result of an internal police investigation into the leaking of security documents from the security forces to Loyalist armed groups. For more details, see *United Kingdom: Political Killings in Northern Ireland*, AI Index: EUR 45/01/94.

⁷ In July the Northern editor of the *Sunday Tribune*, Ed Moloney, was ordered under the Prevention of Terrorism Act to hand over interview notes and other materials as a result of publishing the 1990 interview with Stobie in the *Sunday Tribune*. The order was withdrawn in October after legal challenges were successful. The information concerning Stobie's interviews with the RUC was revealed during the August court proceedings in relation to Moloney's case (see AI Index: EUR 45/30/99).

n) It was reported that a security force source stated: "There were a significant number of informants giving information to the RUC about Finucane. I don't doubt that what Stobie is telling us is right." (*The Independent*, 24 January 2000)

"Stevens 1 and 2"

John Stevens, a senior British police officer, was requested by the RUC to carry out a limited investigation after it was revealed that security documents, giving details of Republican suspects, had gone missing from two security bases in Northern Ireland. He began the investigation in September 1989 and reported in May 1990. As a result of the investigation, 59 people were charged or reported to the Director of Public Prosecutions (DPP), the overwhelming majority of whom were members of Loyalist organizations. None of them was a member of the RUC. The charges centred almost exclusively on the mishandling of classified intelligence documents, including illegal possession of and communicating to others. The report was never published, although a summary was published; the summary contained 83 recommendations to try and impede the passing on of information from the security forces to Loyalist paramilitaries. Amnesty International was concerned that the scope of the "Stevens 1" investigation was far too narrow to justify the government's claim that it had thoroughly and impartially investigated allegations of collusion. However, as a result of the first investigation, Brian Nelson was arrested and subsequently tried and convicted; this resulted in the disclosure of information about official collusion in the killing of Patrick Finucane.

During the investigation, the office of John Stevens in Northern Ireland was broken into and set on fire in January 1990. At the time it was reported that Stevens had back-up copies of the information and that the fire had not damaged his investigation. According to the *Sunday Times* of 21 November 1999, the breaking and entry and arson had allegedly been carried out by a special team from military intelligence, whose purpose was to delay the investigation being carried out by John Stevens into allegations of collusion by military intelligence with Loyalist paramilitaries. In the following week, the government obtained a gagging order against the *Sunday Times* to prevent the newspaper from making further disclosures concerning this fire. The article⁸ was based on information received from a former military intelligence officer of the Force Research Unit (FRU). A man who police believe to be the source, using the pseudonym of Martin Ingram, was subsequently arrested in December 1999 and bailed in connection with possible breaches of the Official Secrets Act.

The Stevens investigation was re-opened in the spring of 1993 ("Stevens 2"), after he was requested by the DPP, through the RUC Chief Constable, to further investigate some matters which were outstanding after the trial of Brian Nelson. This

⁸ *Sunday Times*, 21 November 1999. Martin Ingram was allegedly a member of the army's Intelligence Corps from 1980 to 1991.

time, not only was there not a published report of the investigation, there was not even a published summary. In fact, very little is known about the second investigation. At the time John Stevens had stated that he was investigating the circumstances surrounding the murder of Patrick Finucane; but subsequently in 1999 he stated that he had never investigated the murder of Patrick Finucane. It is believed that the second investigation examined the role of Brian Nelson's army handlers; however, no prosecutions were brought against any of them.

“Stevens 3”

“Stevens 3” was set up in April 1999 to re-examine the killing and allegations of official collusion in the murder of Patrick Finucane. This investigation, led by John Stevens⁹, was initiated by the RUC after British Irish Rights Watch submitted a report to the government, detailing allegations of collusion and citing internal official documents as evidence.¹⁰ The family of Patrick Finucane reacted strongly to the setting up of this investigation, stating: “It is our firm position that this new police investigation which has now been called Stevens 3 was set up to prevent a full public judicial inquiry being established or to delay it”.

The Independent reported on 24 January 2000 that the investigation team sent evidence to the DPP naming six members of the UDA in connection with the murder of Patrick Finucane: three hitmen and three people in the back-up team. Stevens reportedly recommended that they be charged with murder. It was also reported that they had collected forensic evidence to support the claim that RUC officers failed to take action to prevent the killing.

To date, one person has been charged with the murder of Patrick Finucane, and that is William Stobie (see above).

“Stevens 3” is a criminal investigation into who killed Patrick Finucane. It cannot be a substitute for a full-scale judicial inquiry into all the circumstances surrounding the killing, including the role of different government agencies in collusion, and the role of different government authorities in the cover-up.

⁹ Sir John Stevens became the Metropolitan Police Commissioner on 1 February 2000. The investigation continued, with Stevens in overall control, but the day-to-day running of it was taken over by Hugh Orde, a deputy assistant commissioner of the Metropolitan police.

¹⁰ British Irish Rights Watch, *Deadly Intelligence: State collusion with loyalist violence in Northern Ireland*, Summary published in February 1999 on the tenth anniversary of Patrick Finucane's killing.

Joint Legal Opinion for Amnesty International

In response to the then Secretary of State for Northern Ireland Mo Mowlam's request for legal opinions on the inter-relationship of ongoing criminal proceedings and setting up a judicial inquiry, Amnesty International sought legal advice. "In Re The Murder of Patrick Finucane and The Case for A Public Inquiry - Joint Opinion for Amnesty International" was prepared by Robert Owen QC, Ben Emmerson and Tim Otty barristers specialising in human rights law, and submitted to Amnesty International on 29 October. The following are excerpts from the legal opinion.¹¹

After reviewing the UK legislation on Tribunals of Inquiry, the opinion states:

... it is our view that a Government can, and indeed generally should, establish a public inquiry – whether through the mechanism of the 1921 Act or otherwise – whenever the following criteria are met:

- (a) Allegations of serious misconduct and prima facie merit have been made against those acting, or purporting to act, on behalf of the State;
- (b) Those allegations are sufficiently widespread and are being treated sufficiently seriously by those outside Government to undermine the public's confidence in the integrity of the State and in the rule of law;
- (c) The allegations relate to a sufficiently defined event or series of events to allow an inquiry to be given proper and clear terms of reference;
- (d) An inquiry would represent the most effective means of establishing the merit of the allegations made and so of restoring public confidence.

18. It is our clear view that each of the criteria set out in paragraph 17 above have been met in the case of Patrick Finucane and that, accordingly, the Government has ample material available to it to justify the establishment of a public inquiry into the circumstances surrounding his killing. We also consider that it is strongly arguable that were the Government to refuse to establish such an inquiry then its decision would be susceptible to judicial review and would place the Government in breach of its obligations under the European Convention on Human Rights. We address each of the criteria referred to above in turn.

Serious nature and prima facie merit of allegations

¹¹ The full text of the 29-page opinion, *In Re The Murder of Patrick Finucane and the Case for A Public Inquiry, Joint Opinion for Amnesty International*, is available from Amnesty International.

19. The allegations of state collusion in the killing of Mr Finucane are quite obviously of the utmost seriousness. As indicated in paragraphs 3 to 6 above and further explained in paragraph 20 below, at their highest, they suggest the active participation of military intelligence and / or the RUC in Mr Finucane's assassination and that he was targeted for assassination by reason of his work as a criminal defence solicitor specialising in terrorist cases. If true the allegations would amount to the gravest affront to the rule of law and to the operation of a democratic system in Northern Ireland.

Widespread nature, and serious treatment, of allegations

21. The degree of support for an inquiry into the killing of Patrick Finucane is, in our view, unprecedented. We are, in particular, unaware of any other call for any inquiry which has obtained such a breadth and depth of support. We consider the following matters to be of particular significance in this regard:

(a) The domestic and international legal community have spoken with one voice in calling for an inquiry. Support for the establishment of an inquiry has come from, amongst others, the Northern Ireland Law Society, the Northern Ireland Bar, the Law Society of England and Wales, the Chairman of the Bar of England and Wales, the Irish Law Society, the Irish Bar, the American Bar Association and the International Bar Association;

(b) The domestic and international human rights community have displayed similar unanimity. The United Nations Special Rapporteur on the Independence of Judges and Lawyers has twice called for the establishment of an inquiry. He has been supported by the Independent Scrutineer of Emergency Legislation, the Independent Commissioner for the Holding Centres, the International Commission of Jurists, the Lawyers Committee for Human Rights, Amnesty International, Human Rights Watch, the Federation International des Droits de l'Homme, the Committee for the Administration of Justice and British Irish Rights Watch;

(c) The Irish Government – having seen the British Irish Rights Watch report referred to above – has described the case for an inquiry as “*compelling*”¹²;

(d) The United States House of Representatives has voted to block any further policing co-operation with the RUC until an independent inquiry into the killing of Patrick Finucane has been established;

¹² *The Independent* 4th May 1999

(e) The calls for a public inquiry have been given fresh – and tragic – momentum by the murder in March [1999] of Rosemary Nelson, another lawyer specialising in representation of those accused of terrorist crime and who had allegedly been the victim of intimidation and harassment by the RUC.¹³

Most effective means for restoration of public confidence

23. It is our view that a public inquiry is the most – and indeed the only - effective means by which the allegations relating to the murder of Mr Finucane can now be properly addressed and by which the public confidence which they have undermined can be restored. In reaching this conclusion we have taken account of the following facts and matters:

(a) The major significance of the Finucane case in our view lies not in the guilt or innocence of any particular individual or individuals – whether [Alfred] William Stobie or others – but in the suggestion of state involvement in the killing. A public inquiry armed with powers of subpoena would be best placed to investigate these matters. In contrast to either civil or criminal proceedings the inquiry process would be inquisitorial rather than adversarial and would be specifically designed to address the public concerns which have been raised and to search for, and establish, the objective truth rather than simply to weigh up the individual merits of two conflicting cases;

(b) Although there have been 2 previous investigations by John Stevens into allegations of collusion on the part of the security forces, on neither occasion have the reports produced been published and on only one occasion was even a summary published. It is also by no means clear to what extent these investigations focussed on allegations of collusion into Mr Finucane's death as in April 1999 John Stevens gave a press conference at which he stated that he had "at no time"¹⁴ ever previously investigated the murder of Patrick Finucane but

¹³ On 22nd March 1999 the Independent Commission for Police Complaints in Northern Ireland made a public statement categorising the RUC's investigation into the alleged threats by RUC officers against Mrs Nelson as unacceptable in a series of respects and referred to "ill-disguised hostility to Mrs Nelson on the part of some police officers".

¹⁴ See Irish News 29th April 1999 "Fury over Finucane inquiry revelation"

that his inquiries into collusion “were linked to the murder of Patrick Finucane”¹⁵;

(c) Although there are ongoing civil proceedings between Mr Finucane’s widow and the Ministry of Defence it is our view that these are a wholly inadequate means of establishing the full facts in the public interest and are certainly less likely to achieve this end than a public inquiry. The most striking example of this imperfection is likely to lie in the discovery process where the initial sifting of documents for relevance and redaction of material documents is likely to be carried out by a lawyer in the Treasury Solicitor’s department without the benefit of an overview of the key issues in the case which the Chair of a properly established inquiry would have. Further as pointed out above the whole purpose of civil proceedings is different to that of an inquiry being designed to resolve individual rights rather than to address public concern;

(d) Finally, and adopting the logic of the Prime Minister when announcing the second inquiry into the events of “*Bloody Sunday*”, “*where the state’s own authorities are concerned we must be as sure as we can of the truth*”. State involvement is, of course, exactly what the most serious of the allegations raised in the Finucane case are concerned with and the same logic must, in our view, therefore apply.

¹⁵ *ibid.*

24. The Government has expressed a concern that “many of the matters that the inquiry would be asked to consider would be likely to relate to intelligence gathering and operational security force activity which could not be brought into the public domain”¹⁶ and has asked for advice as to “How a public inquiry [would] resolve this difficulty?”¹⁷. Although an understandable concern we do not consider that the difficulty identified by the Government is in any way insurmountable or should be given undue weight. First it cannot be the case that the mere fact that allegations are made against the intelligence services renders the establishment of a public inquiry impossible – on the contrary allegations of the seriousness with which this case is concerned, in our view, demand to be addressed in public. Secondly even if particular matters do, in the national interest, require protection from publicity this is well within the power of the Tribunal. Section 2(a) of the Tribunals and Inquiries Act expressly allows the public to be excluded from the proceedings if it would be “expedient” in the public interest¹⁸.

The legal opinion goes on to argue that a refusal by the government to establish an inquiry would be in breach of the European Convention on Human Rights. It then addresses the issue of the interrelationship between a public inquiry and criminal proceedings and the government’s concern that criminal proceedings might be compromised. The opinion states that “the procedure of an inquiry is just as valuable for clearing away unfounded suspicion as for unearthing misconduct and, accordingly, the establishment of an inquiry should not, as a matter of logic, have any material impact on or implications for the conduct of the criminal proceedings” (para 28.a). The legal opinion cites the government’s approach in other cases which make it clear that the government has in the past itself recognized that there is not necessarily an inconsistency between the continuation of a criminal investigation and a public or judicial inquiry (para 29).

¹⁶ Northern Ireland Information Service press release 13th May 1999 available at <http://www.nio.gov.uk/990512h-nio.htm>

¹⁷ see press release 13/5/99 and footnote 37 supra.

¹⁸ The flexibility available to a Tribunal and demonstrated by Section 2 was recognised in the recent Court of Appeal ruling on anonymity in the context of the Bloody Sunday Inquiry, see *R v Lord Saville of Newdigate ex parte Ministry of Defence*, Times 29th July 1999

On 15 November Amnesty International sent the legal opinion to the Secretary of State for Northern Ireland, Peter Mandelson, urging him to initiate forthwith a judicial inquiry. The Secretary of State replied on 2 December that the government would be in a better position to decide what further action would be needed once the outcome of the current police investigation and criminal proceedings was known.

Amnesty International is seriously concerned by the response of the Secretary of State as it failed to deal with the arguments set forth in the legal opinion. The opinion detailed why it was incumbent on the government to establish an inquiry promptly, and why the announcement of such an inquiry, and indeed even the establishment of such an inquiry, at this stage would not impede the criminal proceedings. It also gave various examples of other situations in which inquiries have been set up alongside criminal proceedings.

As the UN Special Rapporteur on the Independence of Judges and Lawyers stated in his 1998 report,

“Principle 17 of the United Nations Basic Principles on the Role of Lawyers provides, ‘Where the security of lawyers is threatened as a result of discharging their functions, they shall be adequately safeguarded by the authorities.’ If it is true that Brian Nelson informed military intelligence of the UDA’s intent to murder Patrick Finucane ... Then the Government has violated its duty to safeguard Patrick Finucane. Further, this omission would constitute a violation of article 6 of the International Covenant on Civil and Political Rights. The outstanding questions surrounding the murder of Patrick Finucane demonstrate the need for an independent judicial inquiry. So long as this murder is unresolved, many in the community will continue to lack confidence in the ability of the Government to dispense justice in a fair and equitable manner.”¹⁹

¹⁹ The UN Special Rapporteur on the Independence of Judges and Lawyers, Dato’Param Kumaraswamy, visited the UK in October 1997 to investigate allegations he had received since 1994 of a pattern of police officers making abusive remarks about defence lawyers in Northern Ireland, particularly about lawyers representing suspects arrested under emergency legislation. The Special Rapporteur concluded that the police systematically harass and intimidate lawyers. In his report he cited examples of these forms of abuse. He also focussed on the killing of Patrick Finucane, in 1989, in this context. (See E/CN.4/1998/39/Add.4)

The Special Rapporteur reiterated his call for an inquiry in his oral statement to the 55th Session of the UN Commission on Human Rights when he stated: "I am even more convinced that there is now a stronger case made out for a Royal Commission of inquiry into that murder [of Patrick Finucane] to ascertain whether there was security forces, including the RUC, collusion."²⁰

Over the years, documented evidence has emerged indicating a systematic practice of collusion between state agents and Loyalist paramilitaries in political killings in Northern Ireland. To date, there has been no serious attempt to investigate these practices. These allegations must be investigated or the UK government runs the risk of further perpetuating a climate of impunity for human rights violations. As Amnesty International has previously noted, there has been a failure by the authorities, when allegations of abusive practices arise, to investigate thoroughly, independently and fairly such allegations. If the government is committed to the reforms suggested by the Patten Commission which aim to establish a human rights ethos in policing in Northern Ireland, then it is vital that an independent and thorough investigation into collusion be undertaken.

Amnesty International, in particular, urges the government to underscore its commitment to the rule of law by establishing immediately an independent judicial inquiry into all the circumstances surrounding the killing of Patrick Finucane.

²⁰ The Special Rapporteur on the Independence of Judges and Lawyers, Oral Presentation to the 55th Session of the Commission on Human Rights, April 1999.