‘THE ETHICAL ISSUES ARISING FROM THE RELATIONSHIP BETWEEN POLICE AND MEDIA’

Advice to the Commissioner of Police of the Metropolis and his Management Board

Elizabeth Filkin

January 2012

My thanks are due to many people who have helped me during this Inquiry.

The Commissioner, the Management Board, the senior management team of the MPS and the critical readers have been assiduous in providing me with information and discussion. Many police officers and staff across the MPS have contributed through meetings and by responding to my request for information through the MPS intranet. Journalists, politicians and others, some from organisations with responsibilities towards policing, have helped shape my thinking. These are listed at Appendix C unless they asked me not to publish their name. In particular, my thanks to the staff team who have supported the work with diligence, ideas and unfailing good humour.

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CHAPTER 1: INTRODUCTION

In July 2011 there were perceptions that phone hacking at the News of the World was more widespread than had previously been identified, and that the Metropolitan Police Service (MPS) may not have investigated these concerns thoroughly. The then Commissioner of the MPS and an Assistant Commissioner resigned.

In July 2011 the then Commissioner Sir Paul Stephenson asked me to review the relationships between the MPS and the media. On the 13th of July 2011 the Prime Minister announced a Public Inquiry to be chaired by Lord Justice Leveson into the 'Culture, Practices and Ethics of the Press'. My work commenced in August 2011 and continued under the new Commissioner Bernard Hogan-Howe.

1.1 How I have approached the task

My Inquiry has been designed to assist the MPS in carrying out its duties to protect the public and I do not underestimate the judgement demanded of police officers and staff on a daily basis. Good judgement needs to extend to relationships with the media. Neither do I underestimate the managerial task in leading the MPS. It is a complex organisation of 54,000 employees, providing a high profile service for London that is of intense interest to the media and the public.

My terms of reference were -

> *"To advise the Commissioner of Police of the Metropolis and his Management Board as follows:*
>
> - *Generally as to ethical issues arising from the relationship between police and media;*
> - *The proper purpose of the relationship between senior officers/staff and more junior officers/staff and media executives and reporters at all levels;*
> - *Steps that should, or might, be taken to improve public confidence in police/media relations;*
> - *Whether there are practicable steps that should be taken to improve transparency of police/press relationships;*
> - *What, if any, hospitality is it acceptable for police officers/staff to receive or provide from/to the media;*

- *What evidence in relation to these issues should be led by the MPS to the Public Inquiry announced by the Prime Minister on 13 July 2011?"*[1]

I have considered much written material and carried out discussions with 137 people, mostly individually, but some in small groups.[2] The interviews have been with police officers and staff from all levels of the organisation, the Metropolitan Police Authority (MPA), Her Majesty's Inspectorate of Constabulary (HMIC), the Independent Police Complaints Commission (IPCC), reporters, newspaper editors, people in business and politicians. I am grateful to all those who have considered these matters with me. I have used, with permission, some quotations from these interviews to illustrate the views put to me. They are either attributed to a named person or to a role. Where I have quoted from written material they are footnoted. The views put to me have differed widely. This report is, of course, my own view.

I have met with staff from the MPS operational inquiries - Weeting, Elveden, Tuleta and Appleton[3]. I met with Lord Justice Leveson to inform him about my Inquiry, and I have liaised with the MPS counsel for the Leveson Inquiry and provided him with some early findings. I have also consulted with the HMIC on their Integrity Review and with the MPA on their Anti-corruption Survey.

I have reviewed the current constraints for the MPS in providing information to the media: The Children and Young Persons Act 1969, the Magistrates Court Act 1980, the Contempt of Court Act 1981, the Police and Criminal Evidence Act 1984, the Data Protection Act 1998, the Official Secrets Act 1989, the Misconduct in a Public Office Guidance, the Police (Conduct) Regulations 2008, the Bribery Act 2010, the Police Staff Discipline Procedures, and the numerous MPS internal policies and standard operating procedures. It is clear that these are not always adhered to.

During my Inquiry I consulted the MPS Management Board and the Commissioner's Policy Forum on four key issues which emerged from my interviews. These were -

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[1] Terms of Reference for Independent Adviser on Ethics of Police / Press relations 2011.
[2] See Appendix C.
[3] Operation Weeting - a police investigation into allegations of phone hacking by the News of the World.
Operation Elveden - a police investigation, supervised by the IPCC, into e-mails received from News International that allegedly show payments being made to police by the News of the World.
Operation Tuleta - a police investigation into hacking in general terms and so far involved consideration of hard drives, and other documentation seized in historic operations.
Operation Appleton - The MPS response to the Leveson Inquiry.

- The core principles to be established to govern the relationships between the MPS and the media.
- The changes necessary to the leadership and management of the MPS to put these into practice.
- The changes necessary to the Directorate of Public Affairs (DPA).
- The prevention of unethical relationships between the police and the media in the future.

My experience during this review is that the MPS has been open and helpful in trying to identify problems and they have convinced me they wish to bring about change.

1.2 My Key Messages

The problems I have identified are set out in Chapter 3. Based on these, the following are my key messages -

1. It is critical for policing legitimacy that the MPS are as open and transparent as they can be and the media[4] plays an important part in this. On occasions the MPS has not been open enough in providing the right information to the public.
2. The media is vitally important in holding the MPS to account on behalf of the public.
3. The media is essential in informing the public about the work of the police service and its role in the justice system.
4. It is impossible for an organisation to control every contact with the media. Any proposed solution will rely on police officers and police staff 'living' a set of core principles and making judgements about their application.
5. In the past it has not been sufficiently clear to police officers and staff what principles should underpin contact with the media. This has resulted in practices which have been damaging.
6. Where relationships with the media appear partial or selective, this creates a serious problem which is damaging to public confidence and to the MPS.
7. Police officers and staff are the best ambassadors for the organisation in providing information to the public. They are part of the public they serve.
8. The problems that I have been told about and the changes that I suggest are to do with broad organisational issues including leadership and management throughout the MPS. A narrow view focused only on the specific task of handling the media will not be productive.

[4] The media includes national and local newspapers, radio, television, the news agencies, freelance journalists and the internet.

CHAPTER 2: BACKGROUND

2.1 Background

At every level the Metropolitan Police Service has contact with the media and in some areas the relationships work well. However, the events of July 2011 led to widespread criticism of the way the MPS handled these relationships.

> *"The obvious thing, if you were making a film about the phone-hacking saga, would be to concentrate on the extremely dramatic events of July 2011 – a month that saw revelations that plumbed new depths in journalism. There were resignations, arrests, a death, parliamentary debates, corporate high drama; family feuding; multimillion-pound payoffs, the closure of a newspaper … and the climax: the "most humble day" in the life of the most powerful media tycoon of this, or of any other, generation."*[5]

> *"The anger in July about hacking was synthetic. Everyone knew it was going on. It was abundantly clear that the police had gone soft on News International - this was the most serious thing."*
>
> *Sir Simon Jenkins, columnist*

There was speculation that cosy relationships involving excessive hospitality, between some senior police officers and News of the World journalists, undermined the willingness of the police to pursue possible criminal offences beyond the two convictions in 2007. Such perceptions, regardless of the facts, damaged trust in the impartiality of the police. A typical view expressed to me during my Inquiry was:

> *"The only reason that I can think that the hacking enquiry was not fully pursued was that it was a story that the police did not wish to uncover. They did not want to damage their relationships with News International. It was appalling negligence if not corruption. I fear that the damage to public confidence in the police as a result of the hacking scandal will be colossal and am concerned that there may be worse to come when these matters go to trial."*
>
> *John Whittingdale, MP*
>
> *Chairman, Culture, Media and Sport Select Committee, House of Commons*

[5] Alan Rusbridger - Editor, The Guardian. 'Hacking away at the truth: Alan Rusbridger's Orwell lecture'. University College, London. 10th October 2011.

Peter Clarke informed the Home Affairs Select Committee as follows:

> *"We considered whether there should be an exhaustive analysis of this material (the 11,000 pages seized from Glenn Mulcaire) and decided against it... Given the wider context of counter terrorist operations against actions that posed an immediate threat to the British public, when set against the criminal course of conduct that involved gross breaches of privacy but no apparent threat of physical harm to the public, I could not justify the huge expenditure of resources this would entail over an incredibly protracted period."*[6]
>
> *Peter Clarke*
> *Former Deputy Assistant Commissioner*
> *and Head of Anti-Terrorist Branch*

However, there were other views expressed. For example:

> *"While Scotland Yard's public position remains that it did all that its resources and the law permitted, some police sources admit privately that they failed to fully investigate the case, that decisions may have been distorted by a fear of upsetting Rupert Murdoch's newspapers and that it was 'unfortunate' that the officer in charge of the inquiry, AC Hayman, subsequently left the police to work for News International as a columnist."*
>
> *Nick Davies, Freelance Journalist*

The Home Affairs Select Committee concluded:

> *"Even if all his social contacts with News International personnel were entirely above board, no information was exchanged and no obligations considered to have been incurred, it seems to us extraordinary that he [Andy Hayman] did not realise what the public perception of such contacts would be - or, if he did realise, he did not care that confidence in the impartiality of the police could be seriously undermined."*[7]

[6] Home Affairs Select Committee, 'Unauthorised tapping into or hacking of mobile communications' oral evidence 12th July 2011.
[7] Home Affairs Select Committee, 'Unauthorised tapping into or hacking of mobile communications' 13th Report of Session 2010-12, House of Commons.

"If you ask yourself the question, not just 'are we right?', but 'are we seen to be right?', then we failed the test on the News International scenario. In terms of being close to News International, we were investigating them. The perception is that the investigation is linked to our good relationship. We haven't done enough to give the public confidence that the two things aren't linked."

Chief Constable Adrian Lee, Northamptonshire Police
Portfolio Lead for Professional Ethics, ACPO

The issues arising for the MPS as a result of the events of July 2011 are serious. The estimated cost to the MPS of the subsequent enquiries and other unforeseen consequences - for example the loss of senior staff - is more than three million pounds.

It is necessary for the MPS to have a good working relationship with the media and to respect responsible journalism. A free press is essential to a democracy as it can provide scrutiny of public institutions such as the MPS, and is essential in providing information about what the police do. However the tasks of the police and the media will often be different and on occasions may conflict.

The police are in a unique position in that they hold large amounts of privileged information which, if disclosed, can cause harm to people's lives, jeopardise prosecutions or hamper police investigations. Disclosures of such information damage public confidence.

It is particularly important for the police to maintain a strong working relationship with the media given the coercive powers afforded to policing. The police should actively protect proper scrutiny of their work.

"In a country governed by the rule of law the independence of the press is a constitutional necessity."[8]

"Journalists have always talked to the police in order to find out information or to get stories and the idea that the relationship should be shut down is dangerous for both journalists and for the police. It would limit any officer's ability to raise legitimate concerns and it is only going to

[8] Lord Justice Judge's speech on press regulation, Human Rights Law Conference: London, October 2011.

raise suspicions of the police if the message is that they will not talk to anyone."[9]

Since the year 2000 the MPS has actively encouraged more contact with the media. The then Commissioner, Sir (now Lord) John Stevens set out the following view:

"We therefore, need to take a new approach to our working with the media by developing more effective and positive relationships with journalists. This is a job for us all, not just the Directorate of Public Affairs. Over the years, I have seen the Met become increasingly cautious in its media relations and become far too reactive. This cautiousness can breed suspicion and contempt, while an open approach tends to breed confidence and respect. If we are to gain the goodwill, confidence and support of the general public and achieve our aim of making London a safer place, we need to re-engage with the media and seize every opportunity to be much more proactive. I want to see Metropolitan Police officers and civil staff representing the Service through the media, speaking up about their achievements, correcting inaccuracies and just as importantly, explaining why things may not have gone as we would have liked."[10]

"There have been massive changes in the last 20 years. With the exception of this summer it has been change for the good. My name was brought up in the Commons - it was being said 'don't be a footballer or a celebrity in London because someone will sell it (their story) to The Sun newspaper.' Not one of those stories came from a police officer. The MPS are screaming leak all the time which makes it very difficult."

Mike Sullivan, Journalist, The Sun

Many people have said that this encouragement has contributed to the current problems. However, in my view it has been the interpretation rather than the intention of this approach which has been damaging and needs to change.

The key is to provide clear guidance and achieve accurate, transparent recording of contact. This, in turn, will promote public trust:

[9] Padraig Reidy, Index of Censorship as quoted in Police Oracle, 2nd September 2011.
[10] MPS Special Notice 19-00, September 2000: *A new policy for relations with the media.*

"Public trust and confidence in the police are also bound up with the social meaning and cultural significance of the police that goes further and deeper than the legal mandate of catching criminals, protecting citizens and keeping law and order. The police are the 'civic guardians' of the community's 'moral architecture' (Loader and Mulcahy 2003), and people look to the police to typify and represent these moral values, and to defend and reassert them when they are perceived to come under threat."[11]

In 2010 Chief Constable Andy Trotter, Chair of the Association of Chief Police Officers (ACPO) Communications Advisory Group, supported this view of transparency and trust:

"Some information is supplied essentially on trust - for instance pre-trial briefings, under embargo. This is a measure of the robust health of the relationship. Such pre-briefing -

- *Highlights good work and re-assures the public.*
- *Sheds light on technique or noteworthy interagency cooperation.*
- *Deters future offenders and prevents crime.*
- *Helps to manage media needs for high profile cases.*
- *Encourages accuracy in complex cases.*
- *Counters anticipated criticism of police post-trial.*

Accurate record keeping is vital. This should not mean a major bureaucratic burden, but forces will be able to explain and justify more easily if they have a clear audit trail."[12]

I regard this as helpful guidance.

[11] Hohl, K. To be published. The Role of the Mass Media in Public Trust in the Police. Available at SSRN: http://ssrn.com/abstract=1928522
[12] ACPO Communication Advisery Group Guidance, 2010.

CHAPTER 3: KEY PROBLEMS IDENTIFIED IN THE RELATIONSHIP BETWEEN THE MPS AND THE MEDIA

There is much in what I have been told which indicates that there are some good working relationships between the MPS and the media. Sadly this is not true throughout. The key problems are as follows:

3.1 IMPROPER DISCLOSURE OF INFORMATION TO THE MEDIA

The interface between the MPS and the media is extensive and contact occurs at many levels. This is unsurprising in itself but the lack of transparency and the inadequate control of information passing outside the organisation causes problems. Some journalists told me they have several hundred police officers and staff on their phone contact lists. I have no evidence of how many may be proper or improper contacts, however it does indicate the potential risk and its scale.

> *"I have 300 or 400 police contacts on my phone, but they are not all contacts as such, I may try ringing up an officer and be redirected to the press office. Some are happy to talk; this number may be 100 to 150...."*

> *"…If there is a line of investigation, I can be talking to a contact from the police service three days out of five, but then may not speak to them for another year or two."*
>
> *Mike Sullivan, Journalist, The Sun*

It is clear both from what appears in the media, and from what I have been told, that there is contact - which is neither recorded nor permitted - between the media and police officers and staff, at all levels. This results in improper disclosure of information which is damaging to the public, the MPS and to the policing of London. An example is how the investigation into the recent leak from Operation Weeting was handled by the MPS and subsequently reported in the media.

> *"The Senior Investigating Officer (SIO) ended up being berated in the media. What the official side were saying was very supportive of the SIO and then this 'senior police' source is also saying all sorts of damaging things. Now it could be something that is made up completely by the*

press and we'll never know, but equally it could be somebody deliberately briefing because it would suit the organisation."

Chief Superintendent Joanna Young
Secretary, Superintendent's Association, MPS

Influence and favour have played a part and have affected what should be an unbiased relationship between the MPS and the media.

"The requirement for police to be independent is even higher than for MPs because they exercise a function we can't."

Chris Bryant, MP, Rhondda

Within the category of 'not permitted' or unregulated contact there are complex issues:

3.1.1 Improper disclosure for personal advantage

It is the view of many people both inside and outside the MPS that information is deliberately leaked for various kinds of improper benefits. These have been described as including: vanity, 'buzz', flirtation, a sense of power and control and professional advantage during employment within the MPS or to gain future employment elsewhere. These may in some instances be linked to the receipt of hospitality or other favours, including gifts or financial benefits.

"I doubt whether money is changing hands. There is this odd kind of fascination with knowing it's them that put it in the paper, it gives them a sense of power. The example I always quote is when Ronnie Biggs was being flown back - elderly and dying of cancer - 70-odd cops show up to escort him because the TV cameras were there."

Kit Malthouse, Assembly Member
Chair, Metropolitan Police Authority

Views differ on whether such leaks are a matter of ethics, impropriety or corruption. It was the general view however that receiving or providing excessive hospitality, cash or other favours are not acceptable for public servants. Police officers and staff conclude that all of these should be regarded as corruption and none of them as 'the way things go on in the MPS.' All are unethical and reprehensible.

3.1.2 Trading

I have also been given examples where inappropriate information has been provided to the media, to dilute or prevent the publication of other information which could be damaging to the MPS or senior individuals within it. Of course there can be proper and ethical negotiations with the media to prevent the obstruction of an investigation, harm to members of the public or the MPS, or to ensure accuracy in reporting. However some negotiations have included unethical placing of material, or offering exclusive stories to the media to bury other information.

> *"So that if you get the Press Officer who says, well, if I give Reporter 'A' a particular story exclusively, then next week Reporter 'A' will do me a favour. And you've got a direct conflict now between what the public needs and what the Press Officer wants."*
>
> *Nick Davies, Freelance Journalist*

> *"I was dealing with a tragic death involving a vulnerable person. Information was provided to a press officer who subsequently briefed the head of DPA. I was very clear that the media should not be given this information because the next of kin had not been informed. I was horrified to discover that the story had reached the media the next day. I understand that the story was given to the media in order to prevent the publication of damaging information about a member of Management Board. There was no possible public interest justification for this and it damaged the trust and confidence of this family in the police. In fact the mother of the victim found out about the death from a reporter who came to her house. It has made me consider carefully how much information to pass upwards."*[13]
>
> *A Police Officer, MPS*

3.1.3 Tip-offs

It is also said that the media is sometimes tipped off by police officers and staff who, as part of their job, have come into contact with celebrities or others in the public eye. Some parts of the media pay members of the public for such information and may have paid police in similar circumstances. Whereas this may be legitimate for members of the public, it is understood, across the MPS, that it is not legitimate for the police.

[13] Some details have been removed from this example to protect the members of the public involved and the confidentiality of those providing the information to my Inquiry.

3.1.4 Bribery and financial reward

Most inside the MPS think that payment for information is received by few. This conflicts with what some journalists have told me and with what some have now said to the Leveson Inquiry. The facts may be clearer when the current MPS enquiries are completed.

> *"There was a News of the World payment centre in Lincolnshire which cash was processed through. What both sides of the operation tell me, i.e. members of the police and News International, is that bribing officers was not as prevalent as people thought …"*

> *"….Let me be fair to the Met. If you've got a thirty-three billion dollar media empire that allows police officers to be bribed then you've got a problem. Because whatever management systems you put in place, if they are going to operate like that there's always going to be problems at the front line. Which is why I think you can make all sorts of regulatory measures, but ultimately this comes down to ethics, and it comes down to the ethics and the behaviour of individuals."*
>
> *Tom Watson, MP, West Bromwich East*

> *"The News of the World did have a scheme for paying police officers. We may never know which ones."*
>
> *Chris Bryant, MP, Rhondda*

3.1.5 Disaffected staff

It has also been said to me that staff disaffected or in dispute with the organisation can become a source of improper and damaging disclosures to the media, in some cases receiving offers of money for their story.

> *"In 2007, a highly confidential Counter Terrorism report was leaked to the Sunday Times. The person responsible, Thomas Lund-Lack, had served an unblemished 34 years with the MPS before taking up a role in Special Branch as a member of Police Staff. Mr Lund-Lack cited the reasons for the leakage as being 'annoyed' by his workplace, and becoming 'more and more angry' about the effectiveness of the Counter Terrorism Command. He admitted that he had done wrong but stated that he felt*

morally justified in trying to bring his concerns to the public's attention."[14] (Mr Lund-Lack pleaded guilty to the offence of *wilful misconduct in a public office* and was sentenced to 8 months imprisonment on 27th July 2007).

"I was offered money from newspapers to tell my side of the story."

PCSO Asad Saeed, MPS

"Leakage can occur for various reasons - corruption or crusades by disaffected staff for example. We tend as an organisation to say nothing when this happens and then perform a strange dance with the press. We should formalise our response and say more".

A Chief Superintendent, MPS

I do not include genuine public interest reporting of wrong-doing as one of these problems, except to observe that the strength of any organisation's internal 'Right-Line'[15] and complaint systems are critical in reducing the risk of police officers and staff using the media to achieve redress or to expose problems. Many of those to whom I have spoken have said that these systems are not always trusted and therefore not used to their full potential.

3.1.6 Other unregulated contact

Many have described to me the existence of unregulated contact which does not result in damage and provides a continuous and healthy dialogue which is firmly in the public interest. They argue that such dialogue benefits from its informal nature and is legitimate, and indeed is essential if the corporate message is inaccurate:

"It's all about unauthorised disclosure from numerous different sources, but I had a lot of conversations with people in the Press office and Press Bureau here, in the sort of two years of that story, where I implored them to recognise that they were acting as a mouthpiece for falsehood. And I tried very hard to alert them to the fact that they weren't just misleading us, they were damaging their own credibility, because people like me knew that what they were saying wasn't true, they would not listen."

Nick Davies, Freelance Journalist

[14] As reported in The Guardian, The Telegraph, and BBC News websites - 27th July 2007.
[15] The MPS system for raising concerns and reporting wrongdoing anonymously.

"If you stop the relationships between the press and the police, it will damage the flow of information. So the reporters are not as well informed and will perpetuate the problem, as stories will be more damaging for the police if the press don't have the background to them. This may create an 'us and them' mentality. Since Stockwell and Tomlinson the public are already suspicious of the police and critical."

A Journalist

Others are sceptical about the need for this type of contact to remain unrecorded because of the very serious danger that it can leave police officers and staff vulnerable to corruption or undue influence, and those governing the MPS cannot be assured that the public are receiving accurate information.

There is sufficient unregulated or unethical contact that is both hidden from scrutiny and harmful to the public and the MPS, to cause serious concern.

3.2 THE RELATIONSHIPS THEMSELVES

It is the perception of the public and some journalists that unethical relationships between the media and the MPS have existed and caused harm. The following problems need attention:

3.2.1 Inequality of access

It is felt both internally and externally that the MPS has not given equal access to all parts of the media for a number of years and that certain special relationships have developed selectively.

"The kind of off the record nature of it all is actually counter-productive, and if we really want to hold public institutions to account we have to do it in an open, transparent and proper way. But the way they operate is they have the kind of closed press briefings, drinks at the pub - it's a club. Journalists get too close to senior police officers, because you get far more stories if you're nice to them than if you're not. And the result is I think we are quite generally in this industry, too reluctant to write critical pieces, than we were previously."

A Journalist

"A central issue is access. When starting work as a journalist I was told by my News Editor that the Reporter's expense account exists solely for the purpose of gaining access. Positioning myself so well among the web of information surrounding my subject (defence) that not only would I hear every piece of silly gossip, detail or plan - I could get each fact double checked by a second reliable source. I was going to live or die as a reporter on the quality of my access. As I got better I would be subject to access from other journalists, industry types and politicians. My editor warned me "If you're not buying dinner, you're on the menu!"

PC David Rendall MPS, Former Journalist

This perception that access was provided unequally is widespread and damaging, whatever the reality of its impact on the independence of decision making within the MPS. When linked in the public mind with all that is now known about hospitality and the criminal activities of some journalists and private investigators, it leads to fundamental questions about the proper discharge of core policing functions.

"I think that there was a set of very unhealthy relationships in the senior team at the Met. Some weren't just briefing against us (the IPCC), but they were briefing against each other. They had partisan supporters in the press which made the process of trying to get any objective picture of what was happening very difficult. I think if some of the relationships were put on a clearer and more transparent footing, confidence would improve."

Nick Hardwick

HM Chief Inspector of Prisons, former Chair, IPCC, 2002-2010

3.2.2 Excessive hospitality

Many of those who spoke to me said that a culture had developed, at some senior levels in the organisation, which made it normal, and in some cases expected, that contact with the media would be close. In addition, hospitality which is now widely considered inappropriate was accepted.

3.2.3 Different rules for some

It was said by some police officers and staff that there appeared to be one rule for senior contact with the media and another for the rest of the organisation. This included the view that the corporate press function operated differently from the local communication arrangements within the London Boroughs.

This inconsistency sends out mixed messages to police officers and staff which in turn has undermined corporate leadership on other matters. The tone set within the Directorate of Public Affairs at the highest level, and some of its activities, have contributed to this problem. Conversely, insufficient time is invested by the DPA in long term planning and risk management of strategic media issues.

Many have told me they would not give confidential information to the DPA because leaks regularly occurred and that such leaks have harmed work.

> *"When working as a local Press Officer, I would occasionally be pushed for information by news reporters. I recall one investigation where a celebrity was potentially one of the suspects. I had agreed a one line position with DPA in case we received media approaches. A national tabloid journalist called asking if the celebrity had been brought in for questioning and I provided the agreed response. The reporter was not satisfied with my response and said that if I wasn't more helpful he would have to get someone from DPA to talk to him. The reporter was very pushy and aggressive. I was later advised by the DPA that the lines had been redrafted to provide additional information. I was told that he had a special relationship with the DPA and could therefore expect a bit more. This undermined me and made me feel very uncomfortable. I felt that I was expected to have an understanding of this relationship and the need to be more forthcoming with this person."*[16]
>
> *A Borough Press Officer, MPS*

3.2.4 Friends and family

It is not uncommon for police officers and staff to have friends and family associated with the media and some have worked for the media in the past. At present there is no guidance to help police officers and staff who have regular contact with the media in family and social situations to understand what is expected in terms of declaring and handling such contact in an ethical way. To protect officers and staff, the MPS has a declaration policy for business interests which should be mirrored for media contacts in a proportionate way. This policy should go some way to ensure that this issue is dealt with effectively. At present it is unclear whether the declaration policy is applied consistently or action taken when these relationships are not openly declared. It is also likely that, in

[16] Some details have been removed from this example to protect the members of the public involved and the confidentiality of those providing the information to my Inquiry.

some cases, talking to friends or family members, who then repeat the information to the media, is not noticed as a risk. The MPS needs to be alert to this possibility.

> *"It can be a positive thing to have relationships with journalists. I am friends with three or four. The result of this is a positive response when I make personal requests and vice versa. During the riots we were able to get our message out regarding arrests and they got the photos they wanted. We should be able to build these relationships and exercise our own judgement."*
>
> *A Chief Superintendent, MPS*

3.3 ORGANISATIONAL CONTEXT

There are several organisational issues which have created problems in building consistently ethical relationships with the media:

3.3.1 Policy framework and training

In addition to the legal constraints, the MPS has policies and Standard Operating Procedures (SOPs) which deal specifically with media contact and gifts and hospitality. However there are many associated policies which interconnect - for example, misconduct, disclosure of information and declarable associations.

None of these documents provides clear and straightforward guidance on what is acceptable in dealing with the media. As a consequence the MPS has difficulty providing targeted training to support these policies.

> *"We do policy: 'You will do, you won't do'. We shut stable doors when horses have bolted or we try to rush through policy and we end up with some unwieldy policy as a result of it and then we try and legislate to take away people's discretion because we don't trust people's discretion. I don't think we as an organisation know how to set a framework for decision making at the most individual level for people that encompasses something around integrity and ethics."*
>
> *Deputy Assistant Commissioner Mark Simmons, MPS*

It is apparent at all levels within the MPS that the existing documents are not effective in providing overarching guiding principles which help police officers and staff apply sound professional judgement. This lack of clarity can allow the rules to be used as an excuse when followed to the letter rather than in the spirit.

> *"Now the policy relating to gifts and hospitality opens with the presumption that you decline. Historically it has been 'there are occasions where you can accept hospitality' and I think it was the wrong message."*
>
> *Anne McMeel, Director of Resources, MPS*

> *"There is evidence in this survey that the existence of formal ethics programmes and a positive ethical climate are linked with higher standards of ethical behaviour in the workplace."*[17]

> *"But I ask you all to do more than follow the rules. In fact, just following the rules doesn't mean people necessarily do the right thing either. So as well as complying with all the laws and regulations wherever we operate, and with our own standards, which can be stricter, we must apply our principles and values. I want you at all times to ask yourself, "Is this the right thing to do? Is this what we stand for?"*[18]

Some feel that the current MPS training, focused as it is on the detective role, is not reaching all the right individuals or tackling the ethical issues at the heart of the MPS's relationship with the media. It is also felt that there is a lack of coordination and targeting to ensure the right police officers and staff are given the skills they need to handle contact with the media effectively:

> *"We do need to trust our staff, to encourage them to have professional contact with the media. People are losing confidence in speaking to the media, they are getting scared off. There could be better coordination of training to target the right staff, so that we overcome this reluctance."*
>
> *Ed Stearns, Assistant Director*
> *Directorate of Public Affairs, MPS*

[17] Employee Views of Ethics at Work. The 2008 National Survey. Institute of Business Ethics.
[18] Ian Tyler, Chief Executive, Balfour Beatty, foreword to the Code of Conduct - October 2009.

3.3.2 The relationship between corporate and local communications management

Many of those interviewed felt that the MPS invests disproportionate resources in the central press handling operation and the reactive work arising from negative coverage in the national media. This is felt to be at the expense of internal communications and has created a feeling that local media handling is of secondary importance. It is also felt that specialist, minority and in some cases foreign media handling has not received sufficient attention.

Local Borough communications staff often feel they are excluded from the corporate team. Indeed some gave examples of when their information had been improperly used by the DPA, undermining relationships with the public in their Borough.

A focus on the national press is felt to have been at the expense of communicating with the public or certain sections of the public. On occasion, other methods of communicating with the public, such as social media, have been prohibited. Those representing specialist groups within the MPS felt this could be harmful to the MPS in that it reduced the two-way flow of information.

> *"There have been lots of delays in trying to set up a Facebook account for the Greek staff association, to do engagement work. It looked like it was possibly moving forward and then somebody said no, it won't be going ahead. I think it was put on the back burner because Boroughs were told to set up Twitter and Facebook accounts and it just appears that the staff associations were pushed to one side."*
>
> *Police Sergeant Leon Christodoulou*
> *Greek Staff Association, MPS*

> ***"**We have a very well developed partnership with the local authority. We use them to put out Twitter messages for us rather than doing it ourselves; at the time the centre were understandably nervous about us doing that."*
>
> *Detective Chief Superintendent Guy Ferguson*
> *Borough Commander, Sutton, MPS*

There are also ethical issues arising from the use of social media. Guidance should be provided to cover its use. [19]

[19] 'The Ethical Challenges of Social Media.' Institute of Business Ethics. December 2011.

"During the recent disorder we as an organisation were very risk averse in terms of media response. An email came out from DPA preventing local contact with the media, instructing officers to wait for central messages. These proved to be incredibly slow at coming out. The Police were really well supported by the community during the riots but that message was not out there in terms of publicity. When the central messages did start coming out they focused on number of arrests, not about whether communities were getting back on their feet. There was no grip or proactivity in getting the message to our communities."

A Borough Chief Inspector, MPS

"During the disorder last summer I got a telephone call from one of the Sergeants who had been policing the disturbances in the community he served. A Radio 5 Live journalist had contacted him and invited him to comment on his first hand experience of the problems. He telephoned me for advice - he was switched on, I think he would have done a good job. I didn't have any problem with him doing it, but because of the nature of what was happening, I sought guidance from DPA. They came back with the answer 'No, don't let him do it.' I think people locally would have appreciated hearing from a local officer but the corporate response was to prevent the Sergeant from speaking."

Borough Press Focus Group, MPS

There is evidence that local practice of providing information to the public and the media varies. However it is in the local context that many examples of healthy and productive relationships with the media have been identified. Opportunities have been missed to make all police officers and staff effective ambassadors for the work of the MPS in protecting the public.

"We need to separate the value of local media relations from those of corporate and national media relations. We must not damage our relationships with local papers in our haste to repair the image of the MPS."

Julian Hurst, Media and Information Manager, Bromley, MPS

"We should make our staff our best salespeople. The MPS should bother a little less about parts of the written media and invest heavily in both

internal communications and it's ability to communicate directly with people via new social media opportunities."

Sir Paul Stephenson, former Commissioner, MPS

"*In one of my murder investigations, everything pointed to a particular suspect who had disappeared. I needed to track him down. I needed to interview him. I had to talk about him as being someone who would be a significant witness but I was inundated by calls from journalists saying 'look, he's a suspect isn't he?' I ended up having that 'fency' sort of conversation with them. I could have said 'I couldn't possibly comment,' because I knew that if it got into a newspaper it would jeopardise my investigation. But they said 'no of course, we wouldn't do that', and in the end you have to develop a relationship that is based on trust in order to do your job."*

Detective Chief Superintendent Guy Ferguson
Borough Commander, Sutton, MPS

"I have been in roles as a borough senior manager where there was a poor relationship between the police and the local press. In one instance there was lots of negative copy and a defensive police stance. Through meeting with the Editor of the local paper over coffee and agreeing to rebuild the relationship, the situation improved immeasurably over time. Fortnightly meetings were held on police premises, I encouraged officers to attend and provide information. The parameters were clear and the relationships cordial. On one occasion, the Editor called me personally to verify the facts of a story relating to a body found in the Thames. A Police Inspector had given a journalist the impression that the police were not interested in the matter. I was able to correct this impression and the story was reported in the correct light."

Chief Superintendent Steve Bending
Borough Commander, Hackney, MPS

3.3.3 Internal perceptions

Almost everyone to whom I have spoken has a view on where leaks are most likely to occur. There is no particular consensus, with some saying it is a problem at senior level, others that it is in the press office, in business groups, on response teams, in specialist squads or specific departments and so on. What is damaging to the organisation is the

perception that leaking happens everywhere. This has led to a general feeling that leaking is tolerated and does not result in discipline.

> *"I think a part of the problem is that there is a complete lack of clarity of what expectations are, and what prohibitions there are. And even where there are prohibitions, there seems to be a general understanding that so long as you can't be caught then it's alright to do it."*
>
> *A member of Police Staff, MPS*

3.3.4 The discipline arrangements

To date the MPS has not prioritised investigating leaks to the media. Focus has been on leaks to organised criminal networks.

> *"Information leakage to Journalists; it was not on the agenda 12 months ago for us. In the corruption proofing type work, we haven't done anything specific about media leaks."*
>
> *Deputy Assistant Commissioner Mark Simmons, MPS*

There is a widespread view that a certain amount of leaking is inevitable and that investigations of leaks tend to be futile and resource-intensive. Leaks are notoriously difficult to prove to an evidential standard for a criminal prosecution and the current discipline arrangements do not lend themselves to swift and pragmatic action. Where leaks are suspected those arrangements seem over-reliant on a quasi-judicial approach with criminal avenues pursued where ordinary disciplinary and appeal arrangements may be more effective.

> *"Is leaking to the press a crime or is it public interest disclosure? If it isn't criminal it is very difficult to investigate them because many of the methods I would use to solve that crime are no longer available to me if all I am doing is dealing with an internal misconduct matter. We need to get a case to court to have these questions answered, for society to decide. The problem is that an officer will have the might of the press behind him, and the best defence team because the press do not want their sources to dry up."*
>
> *A police officer*
>
> *Directorate of Professional Standards, MPS*

"A member of the MPS was allegedly leaking information to a criminal. Covert equipment was used in order to prove or disprove this allegation. Owing to their very nature investigations of this type are both challenging and time consuming and are not always successful. Covert operations are often resource and cost intensive. I am not sure there is a strong deterrent against leaking information, as much of our effort is of course not made common knowledge. Where an investigation proves that a suspect is in fact NOT leaking the operation would never be publicised. The nature of our business means that sometimes our efforts go un-noticed and the relatively small amount of operations which result in discipline or criminal proceedings means that many perpetrators do not feel a fear of being caught."

Deputy Assistant Commissioner Mark Simmons, MPS

"Investigations into leakage are hopeless. If it is clear that someone has leaked information we use the Codes of Conduct instead. I have been criticised for publishing the results of discipline procedures."

A Chief Superintendent, MPS

I have been told that little information is disseminated internally to demonstrate that such breaches are dealt with robustly or to encourage reporting of improper behaviour. This means that the MPS has not provided a strong corporate message of deterrence on these issues. One example of this, albeit in relation to another type of misconduct, is a recent internal communication which gave relatively few facts about the inappropriate behaviour that resulted in dismissal. This was in contrast to the detail reported in the media:

"A Metropolitan Police Service (MPS) Police Constable was today dismissed without notice at the conclusion of a misconduct hearing. The hearing followed an investigation by officers from the Directorate of Professional Standards (DPS) into allegations reported in the media regarding an inappropriate relationship by a protection officer. The hearing found that the 45 year old officer was found to have committed discreditable conduct. Commander Peter Spindler, in charge of the DPS, said, 'the behaviour displayed by the officer was unacceptable and as such the Board has rightly sanctioned him for the abuse of his position of

trust. He has damaged the reputation of the MPS and the specialist discipline in which he worked. By doing so he breached the high professional standards expected by the public and his colleagues'".[20]

Many newspapers reported more detail on this case. Police officers and staff seeking to understand the standards of behaviour involved were likely to find more in the media than what they were being told at work.

3.3.5 Scrutiny and monitoring of propriety issues and corporate culture

There has been a lack of consistency in how some of the senior team in the MPS conduct their relationships with the media and how they view gifts and hospitality. This is clear from the wide variation in hospitality received by senior level police officers and staff as recorded in the MPS gifts and hospitality register, which was published for the first time in September 2011.[21] This has resulted in mixed messages to police officers and staff in terms of what is seen to be acceptable behaviour. This is damaging when the rest of the MPS ought to be able to take their standards from a consistent example set by the senior team. Many of those who spoke to me said that they saw the gap between the senior management team and the rest of the MPS as too wide.

"There is the syndrome of people who make hugely bold statements, or lead the organisation without taking moral responsibility for how it is achieved. If they distance themselves from the solution, then that's not going to work. There has to be an appropriate, carefully managed flow of information for the greater public good led from the top."

Chief Constable Adrian Lee, Northamptonshire Police
Portfolio Lead for Professional Ethics, ACPO

"Leadership on the issue of propriety is essential; the MPS promote the phrase 'integrity is non-negotiable'. The management team sets the tone for the rest of the organisation. So first off we have a real challenge around what the senior level model is. I was trying to summarise what the guys and gals out there think about some of the stuff that they've seen and, for them, I think it is that the bosses are filling their boots. That is the feedback we get."

Deputy Assistant Commissioner Mark Simmons, MPS

[20] 'Officer dismissed for discreditable conduct', MPS intranet, 23rd November 2011.
[21] All in the MPS are required to register gifts and hospitality and these records for senior officers are published quarterly. The rules have recently been clarified.

A strong position is now being articulated by the Commissioner and his Management Board. However, unless there is open, continuing dialogue and training to support ethical decision-making, the change will not be enduring, nor will a consistent corporate approach become embedded.

The current organisational culture has made it difficult to create an environment where peer challenge and collective ownership of issues, such as ethical standards, is achieved.

> *"In instances where there have been ethical failures at the top, it falls to those leaders who follow, who have to pick up the pieces, to rebuild trust. Typically they face a demoralised workforce that may be in shock at learning (sometimes through newspaper headlines) of the antics of their company leaders."*[22]

3.4 THE EXTERNAL ENVIRONMENT

The challenges of policing a cosmopolitan capital city with a diverse population are manifold. The MPS deals with levels of demand for information that outstrip any other police service in the UK. The volume of national, political, specialist, minority and foreign media in London combine to create an environment of constant demand. Police information is a commodity that is very valuable to journalists and much of it is of interest and enjoyment to the public. Some of this information is also in the public interest. The scale of this engagement makes it inevitable that MPS activity will be the subject of extensive scrutiny and often criticism. It also creates vulnerability, with the MPS at risk of being pulled into political discourse or tempted to withdraw into a more defensive or closed position. Both could be damaging to proper scrutiny, particularly if the MPS is not able to demonstrate impartiality and independence in an increasingly politicised environment.

Constant scrutiny of powerful organisations such as the MPS is important and the media are key players in its provision. The events of July 2011 have demonstrated that vigorous and fearless responsible journalism is vital for the public interest. In my view the MPS needs to be more open and active in responding to responsible requests for information to improve its accountability to the public. The MPS should never be in the business of providing information or stories to reduce scrutiny.

[22] 'Setting the Tone. Ethical Business Leadership.' Philippa Foster Back, IBE March 2005.

"The only reason the full story came out was all down to a free press... and what these reporters did – peel away at the evidence; accumulate facts; ask questions; cultivate sources; look at documents; talk to people who were involved; win trust; ignore threats; verify information; report accurately- is as good an illustration as you could have for the importance of a free press."[23]

"It is the tabloids that drive the daily news agenda. The Sun, for instance, has continuously broken major world exclusives on politics, sport, the monarchy and the City which are not just interesting to the public but in the public interest. They are followed almost without question by the broadsheets and the BBC. In today's climate, a great many of those stories would never see the light of day. The nation would be all the poorer." [24]

3.4.1 Politicisation

Since 2008 six Management Board members have left the MPS in circumstances where media coverage has played a significant part. It is felt by many that the media is now capable of making or breaking the careers of senior people in the MPS. These events create pressure for positive and negative briefing of the media from those within but also from those outside the organisation. Such loss of senior staff creates serious upheaval and financial costs.

"There is immense pressure on a Commissioner to court the media and in the past there has been misperception that leadership is about the handling of media. Politicians, who rely heavily on media perceptions, indirectly encourage the police to use media. If politicians read and respond to media perceptions and editorials, then the Police Service will use an editorial to make their case, so you give the power to the press."

A Senior Police Officer

From the events of 2011 it is clear that political pressure can cause harm to the operational effectiveness of the MPS and affects whether it is seen as truly independent by the public. It is also widely felt that these problems have been exacerbated by leaks

[23] Alan Rusbridger, Editor of The Guardian, presentation to the Leveson Inquiry, 6th October 2011.
[24] Trevor Kavanagh, Associate Editor of The Sun, presentation to the Leveson Inquiry, 6th October 2011.

and briefings at a senior level from other organisations who are party to information about MPS business and have responsibilities on policing issues.

> *"Politicians are guilty of failing to hold institutions to account. Essentially the working arrangements of Britain's media were not appropriate but politicians just ducked it, for twenty-five years we ducked it, and we allowed it to continue. I think that there are a lot of people who are going to pay the price for that. They were breaking the rules, or breaking the law, but they did it within the context that they were operating in and they thought they could get away with it, because politicians were not doing their job."*
>
> *Tom Watson, MP, West Bromwich East*

> ***"**We need to be seen to be working with local politicians effectively to get things done. Both my MPs came in on the Tuesday after we had trouble on the Monday. They went round and chatted to officers. Because I have a decent relationship with them, I'm quite prepared to let them do that so they get an accurate view - it's good for the officers as well, because they're being listened to. Then you have our MP standing up in Parliament, talking about things from a position of strength."*
>
> *Detective Chief Superintendent Guy Ferguson*
> *Borough Commander, Sutton, MPS*

3.4.2 Journalistic practice and a fundamental conflict

Many feel that close contact with the media has caused the MPS to overestimate the extent to which its own needs are compatible with those of the media.

> *"We have, on occasions, overvalued the national written media. Despite our investment it still misinterprets us and doesn't inform the public as effectively as one would wish."*
>
> *Sir Paul Stephenson, former Commissioner, MPS*

During this review I have been told by journalists that it is their job to obtain information and if necessary to break the rules, and even the law, where to do so is in the public interest. I accept the public interest test and value the scrutiny provided by responsible journalism, but this creates a fundamental conflict for the police service which is impossible to resolve fully, in that the police have a duty to investigate suspected criminal wrongdoing. The sorts of pressure that the media can create for individuals

needs to be recognised by the MPS in preparing its workforce to handle the media with integrity. The MPS needs to respond positively to legitimate journalistic enquiries to reduce improper contact.

> *"I phoned up and said 'I've got some questions here', it was almost as though you were asking for them to release something which is privileged information somehow, it's absolutely not. So I just try back channels now, trying other contacts in the Met, going round the back within the slightly kind of shadowy stuff that you have to do to get data, because the front door doesn't work."*
>
> *A Journalist*

I have also heard from people who have described situations where journalistic practices have gone beyond any objective definition of public interest, have damaged investigations and have caused harm to individual police officers. In addition it is felt by some that the MPS has not always adequately protected officers who have been subject to improper pressure from the media.

It is clear both from speaking to journalists and politicians, and from media reports even during the time of my review, that use of the word 'police source' can mislead. Every time this phrase is used it implies a leak. I have been told that it is also used in situations where the information comes from a different but related organisation such as the MPA, or as a generic term to try and protect the real provenance of a source. It is also sometimes used where the information has been legitimately and formally supplied by the MPS press office. This is a damaging practice with the potential to create a perception that leaks from the MPS are more widespread than they are.

3.4.3 Former employees

Many former police officers and staff are re-engaged through external agencies to assist the MPS in particular tasks, which allows the MPS to capitalise on skills that would otherwise be lost. At present 99 former police officers and staff are employed by the MPS in this way. It is vital that the same principles on ethical behaviour apply to such arrangements.

I have examined some of the material in relation to historic and current anti-corruption investigations. These cases illustrate not only the damage caused by corrupt disclosure of police information to the media, sometimes through private investigators, but also that

former police officers may cultivate their own police contacts to continue to access police information once they have left.

The speed with which some former police officers take employment within the media is also a cause for concern and this has already been raised as an issue in the Home Affairs Select Committee Report into phone hacking.[25] I share that concern. I am also concerned that former police officers, some of whom have been dismissed, take employment with private investigation firms and continue to obtain information from former colleagues within the MPS. If action is not taken to deal with such problems, they may continue to damage the MPS.

3.4.4 Shared responsibilities and the importance of collaboration

The IPCC and the MPS have a shared media protocol but there has been confusion about who is responsible for talking to the media and what can be said. In such cases clarity and ownership is required for scenarios involving both parties. There has also been a lack of information for the public about these arrangements. Both organisations must, together, review the current joint protocols to ensure they are effective in practice. The MPA and its successor body also need to collaborate with the MPS on provision of information to the public.

As an example, the shooting of Mark Duggan demonstrates some of the high profile issues the IPCC and the MPS have had to deal with. This is how the relationship between the MPS and the IPCC was conveyed to the public, and how the public was informed and misinformed about this event by the media.

> **Day 1 - 4th August 2011**
>
> Mark Duggan was shot by police. The officer was taken off firearms duty and, according to the standard protocols in such events, the Independent Police Complaints Commission (IPCC) took over the investigation.
>
> The press report was based on information provided by the IPCC.
>
> > *"The IPCC said it understood that the dead man had been shot by police, and that the officer had been shot and wounded."*
> >
> > *The Guardian*
>
> This was later found to be inaccurate.

[25] Home Affairs Select Committee, 'Unauthorised tapping into or hacking of mobile communications' 13th Report of Session 2010-12, House of Commons.

The police provided no information other than *'the investigation has been passed to the IPCC*'.

Crime reporters relied on witness information because there was a lack of official information.

Day 2 - 5th August 2011

The MPS intranet reported internally -

> *"At approx. 18:15 hrs on Thursday, 04 August there was a shooting incident in Ferry lane, near Jarrow Road, N17. One male (no further details at this time) has been pronounced dead at the scene. One police officer, a man, has been taken to hospital. He has since been discharged. The Department of Professional Standards and the Independent Police Complaints Commission has been informed."*
>
> *Corporate News - 'Shooting incident in N17'*

Day 3 - 6th August 2011

The Duggan family organised a peaceful march from the Broadwater Estate to Tottenham Police Station, to protest about the shooting and the lack of information provided to them by the Police.

> *"They are distraught at the misinformation initially put out that the incident in Ferry Lane was a 'shootout'. The family are also distraught that they read about Duggan's death before they received formal notification".*
>
> *The Guardian Website*

The march was attended by many. Later in the evening there was serious disorder.

Days 4 to 7 - 7th to 10th August 2011

Riots, looting and arson spread across London and the UK. Social media provided one method of organising disturbances. The MPS were criticised for not getting enough information to the public.

Day 9 - 12th August 2011

An apology was issued from the IPCC to correct information supplied at the time of the shooting:

"*It seems possible that we may have verbally led journalists to believe that shots were exchanged as this was consistent with early information we received that an officer had been shot and taken to hospital."*

IPCC website

One month later - 8th September 2011

The day before Mark Duggan's funeral the press reported under the headline *'Pistol found where Duggan died was in a sock, say police':*

"Separate sources say the Bruni BBM starter pistol - which had been converted to fire live rounds of ammunition - was being carried in Duggan's waistband. Other well placed sources say the firearm had been put into a sock, which had had a hole cut into it which, in the opinion of experts, is usually done in order that any bullets fired are not deflected by the material."

The Guardian

The MPS complained about the headline *'Pistol found where Duggan died was in a sock, say police'* arguing that this information had not been provided by the police.

Later that day the press reported:

"Inquiry clears officer over riot shooting", according to 'sources'.

The Times.

The MPS took steps to correct this headline as it was not accurate and potentially inflammatory.

The Guardian provided clarification on the *'say police'* issue.

9th September, 2011

Mark Duggan's funeral took place.

The press reported that Tottenham MP David Lammy had spoken at the Home Affairs Select Committee:

"The good news is that now we have the IPCC and the IPCC stepped in very early. The bad news is the family was then left floundering. I am not sure the communication of the IPCC worked. The need for an active, visible press conference where they say they will get to the bottom of this very quickly - did not happen."

2 months later - 19th November 2011

A press headline read:

"Mark Duggan was not armed when shot by police".

The Guardian

21st November 2011

Two members of the Community Reference Group supporting the IPCC resigned.

"Adviser quits Duggan Inquiry with attack on shoddy investigation."

The Guardian

24th November 2011

The IPPC Chairman, Len Jackson issued a press release:

"I am taking the highly unusual step of clarifying inaccurate, misleading and more importantly irresponsible comment that has appeared in recent days in relation to the IPCC investigation into the circumstances surrounding the death of Mark Duggan. I am doing so because, if these inaccuracies continue to gain currency, they risk undermining the integrity of and public confidence in our investigation. He said the IPCC was determined to uncover the truth about the shooting 'without fear or favour'. He added: We will put all the facts in the public domain at the appropriate time and our investigation will be tested and scrutinised by Mr Duggan's family, the community and the court."

The Evening Standard

27th November 2011

The IPCC and the MPS complained to the Guardian about the headline *"Mark Duggan was not armed when shot by police".*

The Guardian issued an apology:

"Headlines and subheadings are there to attract and lead a reader into a story, but they should never mislead about what is in the text. The Guardian broke that rule in an acutely sensitive area of reporting about the investigation into the death of Mark Duggan, whose shooting by police on 4 August 2011 triggered riots in London and across the rest of England."

3.5 SUMMARY OF PROBLEMS

The perception that the MPS leaks information to the media is prevalent and damaging. The extent of such leaking is not capable of finite evidential proof. The close relationship which developed between parts of the MPS and the media has caused serious harm. There is a lack of hard evidence about the extent of improper disclosure and, where it does occur, what benefit or advantage might accrue to the individual responsible. It is clear, however that there is a range of contact that is 'not permitted' and which, if unregulated, will continue to cause damage to the MPS and the public.

These three areas (the disclosure of information, the relationships which cause this to happen, and the extent to which it is regulated) are key for the MPS in terms of consolidating ethical practice in the future. Collective recognition of these as issues critical to organisational health has not been sufficiently evident in the past.

CHAPTER 4: FINDINGS AND RECOMMENDATIONS

4.1 THE WAY THE MPS COMMUNICATES WITH THE PUBLIC

The MPS relies heavily on the media to provide information to Londoners. The prominence given to this method of communication, and the flaws that are now evident within it, means that the MPS has not been effective enough in providing information to the public.

The way that relationships with the media have developed has resulted in the perception that some have better access to MPS information than others, and I am convinced that some information has been given inappropriately. This situation appears to have compromised the capacity of both the police and the media to scrutinise the activities of the other.

> *"The Metropolitan Police is a very powerful organisation. In many ways, it is a very secretive one. Power needs to be checked and senior civil servants need to be held to account. Restricting or over-regulating contact between crime reporters and police officers will make that crucial function vastly more difficult. Senior officers will not like everything that is written or broadcast. But you cannot be open and honest with the media and expect an endless stream of uncritical publicity."*
>
> *John Twomey, Crime Reporter, The Express*

If provision of information is not more open and impartial, it becomes an issue which impacts directly on public trust. I have also found that the lack of impartiality towards the media has eroded trust internally within the MPS.

For these reasons I consider that more, not less, contact with the media as a whole is essential, providing it is open and recorded. However it is important that the public are informed through all media outlets, not just the national print press, because different sections of the public use media in different ways.

The MPS must acknowledge that providing information to the media is a part of a wider obligation to achieve open and transparent communication with the public.

"Getting information is like pulling teeth, it's a closed shop. I have spent 5-6 years on the (MPA) Finance Committee, and I have always felt we should have been given access to the information behind the top line figures."

Baroness Dee Doocey, Member, Metropolitan Police Authority

KEY FINDING 1

The MPS has not communicated effectively enough with Londoners. It has relied too much on print news media at the expense of other means of communication. Many are convinced that certain sections of the news media have had better access to information than others, which has eroded trust in the independence and impartiality of the MPS.

RECOMMENDATION 1

A new approach to communication based on more extensive, open and impartial provision of information to the public is needed. Relationships with the media need to be part of this but not the driving force. I recommend that the Commissioner delegates responsibility and resources to a member of his senior team to champion a new approach to providing public information. Increasing openness for the public should be monitored through performance indicators.

Supporting advice on this recommendation can be found in Chapter 5.

4.2 LEADERSHIP AND TRUST WITHIN THE MPS

I am concerned by the extent to which police officers and staff feel that some of their senior leaders abide by a different set of rules. There has been wide variation in how the senior team interpreted policy on dealing with the media and receiving gifts and hospitality. In some instances this interpretation is seen as inappropriate. There has been no clear standard set by the senior team for police officers and staff to use as a guide for their own behaviour and in some instances the standards set have been poor and have led to consequent damage.

"I support the Met but I am concerned by the culture at the top. The new Commissioner shouldn't bother with the bottom - it's the top."

Baroness Dee Doocey, Member, Metropolitan Police Authority

Police officers and staff in the MPS need to have the confidence that information is provided to the media for the right reasons and in the right way. If they do not have this confidence they may be unwilling to share information internally, making it difficult for the MPS to get the right information into the public domain. This also increases the risk that reporters will seek unofficial routes, and police officers and staff may be willing to provide information in ways that are not transparent and may be in breach of the rules.

> *"There are some very good people who work for this organisation, who often over the years I found get very worried when their bosses do unethical or even illegal things, and thank God they will talk. I want lots and lots of unauthorised disclosure but it's not our job to go mucking up legitimate proper police enquiries."*
>
> *Nick Davies, Freelance Journalist*

The MPS is rightly concerned about the impact of the media on public confidence, however many feel that as an organisation it is too protective of some information, overestimating the negative impact it may have on public confidence or its own reputation.

> *"Public confidence in the police is much more affected by direct experience than it is by the media take on things. The MPS have always been concerned about 'fear of crime' issues and this has affected their transparency and truth telling. There has been reluctance within the organisation to brief up bad news and a perception that everybody leaks information. The public just want the facts- straightforward and neutral".*
>
> *Professor Betsy Stanko, Deputy Head,*
> *Strategy and Performance, MPS*

Many police officers and staff would welcome a less defensive stance and greater willingness to inform the public about the difficulties and challenges faced by those working in policing. If greater openness is achieved in the information that the MPS gives to the public, police officers and staff will be less likely to operate outside the rules on media contact.

A culture where senior staff are generally trusted cannot be created for one area of work alone. This is an issue which requires the culture to change across the whole organisation and for the changes to be regularly tracked and reported.

KEY FINDING 2

The MPS senior team has not provided consistent leadership on the issue of media contact. The way that relationships with the media have been handled, including the receipt of hospitality, has resulted in mixed messages to staff about the standards expected of them. This has eroded trust within the organisation on the issue of how information is used and whether the right information reaches the public. It has increased the risk of improper disclosure to the media. If managers are not trusted they will be suspected of unethical relationships with the media and staff will not alert them to improper conduct or report mistakes.

RECOMMENDATION 2

The MPS senior team must signal a change in culture and set a consistent example for all staff on the ethical standards they expect, including how they relate to the media and the interpretation of the gifts and hospitality register.

Supporting advice on this recommendation can be found in Chapter 5.

4.3 CORPORATE MANAGEMENT OF ETHICAL ISSUES

In the past the MPS did not identify as a risk the close relationship of some senior officers and staff to certain sections of the media. During my Inquiry members of the senior team acknowledged that there were significant differences of opinion about the need to develop close relationships with the media and the appropriateness of receiving extensive hospitality as part of it. The importance of collective standards on these issues was either not recognised by some of the senior team, or was of secondary importance in a culture where the value of independent decision-making at chief officer level is protected.

Any large organisation needs the capacity to identify, debate and if necessary challenge practices which could undermine corporate values. The MPS must improve its capacity to map ethical risks and to keep such issues consistently on the agenda. Sir Denis O'Connor, Her Majesty's Chief Inspector of Constabulary, has identified problems across the police service nationally in recognising the links between media contact, the offer or acceptance of gifts and hospitality, secondary employment, business interests,

declarable associations and procurement decisions.[26] If the MPS cross-references the information it holds in these registers, it will more readily identify inconsistent standards. It will also help monitor conflicts of interest and risk.

There is no defined place within the MPS for staff to seek advice on what is appropriate in a number of different policy areas.

KEY FINDING 3

The MPS has not taken enough notice of some of the issues which present the greatest ethical challenges for police officers and staff. There has been insufficient monitoring of those activities which can risk undermining corporate values and the reputation of the MPS. There has not been consistent leadership to help staff understand what is appropriate when making decisions about what they do.

RECOMMENDATION 3

I recommend that the Commissioner delegates responsibility and resources to a member of his senior team to initiate change in the way the MPS approaches integrity and ethics issues at all levels. This role will provide the support and direction for staff to implement change and ensure improvements are tracked. This role holder will collaborate with the Public Information Champion. Responsibility for leadership on these issues is shared by all as peer pressure is the most effective way of improving behaviour.

Supporting advice on this recommendation can be found in Chapter 5.

4.4 TRANSPARENCY

According to some, MPS contact with the media has in the past been characterised by back door briefings through informal and unofficial channels. This view was also reached when MPS communications were the subject of some informal advice from the private sector in 2010. I understand that this offer of help from an outside expert on improving communications with the public was undermined by the threat of negative press coverage.

[26] *'Without fear or favour',* HMIC December 2011.

Some contact will involve trusting the media with confidential information. There will also be occasions when negotiation between the MPS and the media will be necessary to ensure accurate reporting. I am concerned that some may use these proper practices to justify a general lack of transparency both in terms of who has contact with the media and what information they provide. Problems like the trading of information or the apparent closeness of some relationships with the media fuel the perception that the business of dealing with the press is by its nature secretive.

> *"I think if you spend your whole career working on secretive investigations, and concealing information, things like that, which is really, really important, it just goes to your head somehow, sometimes, and you think that you kind of own this information, and you forget that you're there to serve the public."*
>
> *A Journalist*

Some fear that requiring a greater degree of transparency in media contact may stifle good investigative journalism in the public interest and force reporters to contact unofficial police sources to get hard information. I am convinced that if the MPS sets clear standards that are based on wide-ranging permission to provide information, these concerns can be mitigated. In most circumstances police officers and staff providing information to the media should expect to be named. In some instances it may be appropriate for only their role or position to be published. It should always be the case that the information is attributed to the MPS.

There may be a very few instances where legitimate contact with the media is not transparent. The public interest was compellingly served, for example, by a measure of unauthorised contact in exposing the extent of phone hacking. It remains the case that police officers and staff who are concerned about the accuracy of information being provided by their organisation should be able to trust internal processes for putting it right. Examples of genuine public-interest 'whistle-blowing' should be rare and should be dealt with proportionately.

KEY FINDING 4

Contact between the MPS and the media has not been transparent enough. This has contributed to a lack of trust internally within the MPS about how information is handled and a corresponding mistrust in some parts of the media and the public. I am not

convinced by arguments that more transparency will stifle good investigative journalism in the public interest or prevent the MPS providing information to the public.

RECOMMENDATION 4

I recommend that all police officers and staff who provide information to the media should make a brief personal record of the information they provide. This record should be available if required by a line manager. Some of these records will be audited on a random basis. Wherever possible, published information should be attributed to the person giving it or more generally to the MPS.

Supporting advice on this recommendation can be found in Chapter 5.

4.5 CORE PRINCIPLES FOR CONTACT WITH THE MEDIA

In the past it has not been sufficiently clear to police officers and staff what principles should underpin contact with the media. Although the MPS has a detailed media policy, there is doubt about how effectively it is followed and whether it is clear enough on the core principles that ought to guide decision-making. Interpretation of this policy has led to polarised positions within the organisation. Some police officers and staff are anxious about speaking to the media, some disengage completely on principle and others foster very close links.

Creating another set of Standard Operating Procedures or media policy will not solve the problems. But guidance that is clear will help the MPS do better at embedding the principles of openness and transparency which I know many police officers and staff support. Advice on how meetings should be conducted and what information can readily be shared should have prominence in the guidance.

It is important that police officers and staff understand that contact with the media is one of many external relationships that the MPS must manage without impacting on its ability to act independently. As with procurement, gifts and hospitality, secondary employment or business interests, police officers and staff need to make judgements about how a relationship could be perceived. Responsibility to declare relationships with the media, as with business interests, needs to be more clearly defined. I see this as protecting individual police officers and staff and supporting them in understanding how to manage those relationships with integrity.

A balance needs to be struck on these issues. Police officers and staff ought to see extensive and open contact with the public, sometimes through the media, as a part of their job. They must feel trusted to fulfil that responsibility without bureaucracy or unnecessary constraint. At the same time, the MPS must improve the transparency of this contact to ensure that the application of policy is consistent and that high levels of compliance are achieved. It must also mitigate risk by declaring relationships which could be seen to be damaging. This balance will be difficult to achieve and requires constant good judgement. It will depend upon the consistent reinforcement of the responsibility to provide information to the public, but to do so in a safe way.

KEY FINDING 5

The MPS has not fully embedded the principles of open and transparent contact with the media. Part of this problem is the lack of clear guidance which places media relationships in the proper context of ethical business practices.

RECOMMENDATION 5

The MPS must establish the core principles which should underpin contact with the media. I recommend that contact with the media is ***permissible but not unconditional***. This should be the overarching principle. Police officers and staff need to have new guidance that helps them understand the value of providing information to the public and supports them in making ethical decisions when doing so. Advice on contact with the media is an essential part of this. So are improved training, supervision and appraisal to ensure the principles become embedded.

Supporting advice on this recommendation can be found in Chapter 5.

4.6 MPS COMMUNICATIONS INFRASTRUCTURE

> *"The media will write crime stories with or without our help. It's best to provide information to ensure that their stories reflect the factual position and do not compromise an investigation or operation. They need to be able to trust that what we have given them is fair and accurate. We also need to recognise the world is a different place and be ahead and influence how things are placed in the public domain through social media."*
>
> *Chris Webb, Deputy Director, Directorate of Public Affairs, MPS*

Many people have brought to my attention the excellent work that is done by the MPS Directorate of Public Affairs (DPA) and I do not underestimate the hard work and commitment of that team. I know that the staff in the DPA want change and that some important steps have already been taken to bring this about. I am aware that DPA rely on the information they receive from others in the MPS and at times this has been inaccurate, resulting in the provision of misleading information to the media.

Nonetheless, I am seriously concerned by what I have been told about reluctance to provide information to the DPA because of two perceptions. First, that the DPA is unwilling in some instances to provide information to the public. Secondly that information is sometimes misused. The impact of these perceptions, regardless of the facts, is damaging because they fuel surreptitious briefing and hamper an effective and transparent corporate response in providing information to the public.

I am also concerned by the perception that the access provided to the media by the DPA has not been impartial, a view that has been expressed internally and externally. This perception appears to have grown as a result of a particular style of leadership. This style legitimised informal contact lacking in transparency and allowed exclusionary practices to develop. The contents of the gifts and hospitality register published in September 2011 reinforced this view. The need to provide more open and equal access to police information does not prevent the DPA from providing information to individual journalists asking for facts. The MPS should continue to judge each request for information on its merits. The ethos of greater openness in providing public information will run alongside the duty the MPS has to respect journalistic persistence and expertise.

I have been told by many that locally driven communication with the media is a very effective way of providing information to the public but that it is seen as secondary to the corporate function, and indeed sometimes stifled by it.

Taken together these issues make it clear that the focus and structure of MPS communication needs to change and that rebuilding trust in the corporate communications function should be a matter of priority.

KEY FINDING 6

The MPS has not provided enough internal communication or made sure that all police officers and staff have the information they need to produce confident and open dialogue with the public, and as part of that, the media. Reactive work involving the national press

has dominated the agenda of the corporate communications function. Local and minority interest media and communications work has often flourished but is handled inconsistently and is seen as a separate discipline. The impact of national press media coverage on public confidence has been overestimated.

RECOMMENDATION 6

The MPS must reinforce the public service responsibilities of the Directorate of Public Affairs (DPA) and local communications work. These functions must operate collaboratively and with equal status. The MPS must make better use of alternative routes for communicating with the public and there must be a predisposition to release much more information than in the past both to the external and internal audience.

Supporting advice on this recommendation can be found in Chapter 5.

4.7 PREVENTION

Many feel that leaking to the media is tolerated in the MPS. I accept that leak investigations are costly and often unproductive. Freedom of expression rights must, of course, be protected by the MPS. But the lack of tangible results from such investigations has left the impression that leaking is not considered a serious problem. This has meant that there have been few concerns reported to managers or the *'Right Line'* about improper disclosure to the media. Until recently leaking had not been recognised as an organisational risk, nor have clear messages of deterrence been sent. The MPS should publicise misconduct findings or prosecutions in enough detail to inform staff and provide more management information.

Some accept that the part of the MPS where they work has a reputation for leaking; but they vigorously challenge the accusation. They have given me a clear picture of how undermining this can be for staff undertaking their duties properly. Most agree that, whether money is involved or not, providing information for personal reward of any kind amounts to corrupt conduct and should be treated as such. They would welcome a stronger stance by the MPS in challenging, publicising and deterring improper disclosure to the media.

Agreeing a set of core principles which leave staff in no doubt about what is appropriate will enable the organisation to identify breaches more readily. When launching such

principles the MPS will have an opportunity to make a clear statement to all police officers and staff.

KEY FINDING 7

The MPS has a widespread reputation for leaking but has not developed a coherent prevention strategy. The difficult and complex task of investigating leaks has been the primary response. The few results which are known about in the MPS have caused many to assume that little else can be done to improve the situation. Now that improper disclosure to the media, whether for payment or not, has been identified as a significant organisational risk for the MPS, there is the opportunity to mount a comprehensive prevention strategy. This should start with standard setting, effective management, and monitoring supported by deterrence and enforcement. The public interest must, of course, be protected by the MPS. However, it must not be used to prevent action in the public interest, for example when a journalist's source is suspected to be a police officer acting corruptly.

RECOMMENDATION 7

The MPS must create an environment where the improper disclosure of information is condemned and deterred. Senior managers should make messages of deterrence strong and effective. Where leaks cannot be proved to the evidential standard required for a criminal prosecution, robust management action should nevertheless be pursued. However, whether there has been genuine harm should always be assessed before proportionate action is taken. Investigations should be seen as an important but subsidiary part of a broader preventative approach.

Supporting advice on this recommendation can be found in Chapter 5.

CHAPTER 5: SUPPORTING ADVICE

RECOMMENDATION 1

A new approach to communication based on more extensive, open and impartial provision of information to the public is needed. Relationships with the media need to be part of this but not the driving force. I recommend that the Commissioner delegates responsibility and resources to a member of his senior team to champion a new approach to providing public information. Increasing openness with the public should be monitored through performance indicators.

SUPPORTING ADVICE

The MPS must create an ethos of providing public information that is fair and equitable, offering police officers and staff at all levels the opportunity to inform the public.

Senior leaders must provide support for police officers and staff to do this, including practical help on the kinds of information. Without this support staff will be unwilling to engage. They may assume that the risks of being found in breach of the new MPS media standards are too great.

Creating a public information ethos is beyond the scope of the DPA alone. It is a broader task that needs to link DPA press functions with other work, including Freedom of Information Act disclosure and the MPS digital and social media presence. The MPS should identify a Public Information champion with a wide-ranging remit to disclose far more information than the MPS currently provides to the public and to provide the function of an editorial board within and on behalf of the senior management team.

This approach might include releasing more high-level material which portrays reality as the police on the streets, and the public, understand it. The MPS has ‘landscape’ documents, which explain the demographic and crime factors which lead the MPS to take certain strategic directions, or other research which shows - among many things - the cost and scale of the ‘unseen’ work the MPS does. At a local level, Borough websites can be used to highlight the day-to-day achievements of neighbourhood teams; or to provide publicity for what the MPS are doing, for example working with councils to disrupt those responsible for anti-social behaviour. More local newspaper blogs - or

controlled tweeting - by appropriate front-line officers might be encouraged, offering a measured commentary on local crime and policing.

RECOMMENDATION 2

The MPS senior team must signal a change in culture and set a consistent example for all staff on the ethical standards they expect, including how they relate to the media and the interpretation of the gifts and hospitality register.

SUPPORTING ADVICE

There is a difficult balance to be achieved in terms of the new messages the senior team must send to the rest of the organisation. The highest ethical standards need to be set, without discouraging contact with the public and the media. Managers need to be more intrusive on issues that could present risk, whilst trusting staff to get on with their jobs. This is a complex managerial response which places additional demands on supervisors.

The MPS must support managers who encourage their staff to engage more openly with the public. There are opportunities within the appraisal process to recognise and reward achievement in this area.

It should be routine for line managers to discuss the role of the media with their staff and encourage contact that supports the new approach to communication. Staff who try to apply the principles must be supported, even when they make mistakes.

Managers need to be alert to the risk that some police officers and staff will be vulnerable to improper disclosure to the media. The annual appraisal process should be used to remind police officers and staff of their responsibilities to declare relationships that could be perceived as creating conflicts of interest and to report improper conduct and mistakes.

Managers need to identify those roles which are high risk or have heavy media contact, and should therefore be given access to additional training, for example newly appointed murder squad detectives and custody staff.

> *"Those who supervise others have additional responsibilities under the code. They must promote compliance and ethics by example - in other*

words show by their behaviour what it means to act with integrity. They must monitor compliance and ethics of the people they supervise, and they must support employees who, in good faith, raise questions or concerns."[27]

RECOMMENDATION 3

I recommend that the Commissioner delegates responsibility and resources to a member of his senior team to initiate change in the way the MPS approaches integrity and ethics issues at all levels. This role will provide the support and direction for staff to implement change and ensure improvements are tracked. This role holder will collaborate with the Public Information Champion. Responsibility for leadership on these issues is shared by all as peer pressure is the most effective way of improving behaviour.

"Everyone in an organisation has a responsibility at an individual level to behave appropriately and to be mindful of others, treating colleagues and customers with respect. There are individuals, however, who are not sensitive to others' needs. Some create situations or dilemmas by their actions (for example bullying, harassment and discrimination). Others blatantly disregard company policies, and the law, driven by greed."[28]

SUPPORTING ADVICE

The function of this senior team member should include -

- The provision of advice to the Management Board, police officers and staff at all levels when interpreting relevant guidance or policy. This includes advice relating to gifts and hospitality, media relationships, declarable relationships and business interests.
- The monitoring of ethical standards across the organisation, for example checking for consistent and appropriate interpretation of the gifts and hospitality policy, and auditing media contact records on a random basis.
- The identification of risks and vulnerability, with the capacity to challenge poor practice and recommend an organisational response.
- Determining the supervisory and performance framework and the training which is needed to support effective compliance.

[27] Extracts from, 'BP: Our Commitment to Integrity' BP Code of Conduct.
[28] 'Setting the Tone; Ethical Business Leadership' Philippa Foster-Back, Institute of Business Ethics (IBE) March 2005 p45.

- Improving guidance as change occurs and experience grows.
- Making sure that police officers and staff are supported when reporting concerns, acting on issues that are raised internally or externally and ensuring that feedback on action is provided.

RECOMMENDATION 4

I recommend that all police officers and staff who provide information to the media should make a brief personal record of the information they provide. This record should be available if required by a line manager. Some of these records will be audited on a random basis. Wherever possible, published information should be attributed to the person giving it or more generally to the MPS.

SUPPORTING ADVICE

This is not intended to create bureaucracy or to stifle contact. I do not envisage the creation of a database of contact records. Monitoring should include dip sampling of records by line managers and audit on a random basis.

Although I am not recommending that records of contact are provided routinely to the DPA, they should be informed as a matter of course when any significant information has been provided to the media. This will be a matter of judgement.

A common sense interpretation of what to record will be necessary, for example where an officer gives multiple briefings on a single issue managed through the press office.

I realise that for some, for example those in the DPA, contact with the media can frequently be administrative and does not involve disclosing information. This would not require a personal record.

RECOMMENDATION 5

The MPS must establish the core principles which should underpin contact with the media. I recommend that contact with the media is ***permissible but not unconditional***. This should be the overarching principle. Police officers and staff need to have new guidance that helps them understand the value of providing information to the public and supports them in making ethical decisions when doing so. Advice on contact with the

media is an essential part of this. So are improved training, supervision and appraisal to ensure the principles become embedded.

SUPPORTING ADVICE

The following should be the core principles underpinning the MPS relationship with the media in providing information to the public -

- The MPS has a duty to provide information to the public and there should be a presumption that as much information as possible is disclosed.
- As part of this, certain information may be provided to the media by **all** officers and staff. The MPS must provide staff with up to date information which can be shared with the public and the media and give clear guidance on the kinds of information the MPS wishes to see in the public domain.
- Providing they have the permission of their line manager, police officers below the level of Inspector (and the equivalent level police staff) are permitted to have contact with the media on issues for which they are responsible.
- For other police officers and staff it will be usual for contact with the media to be agreed with a line manager. Officers and staff at these levels have a responsibility to determine how the public should be informed about the work that they do.
- The presence of a media or communications officer is not a requirement but should always be considered.
- The information provided must be accurate and within the law.
- The information provided should be explicitly attributed to an individual or to the MPS.
- Confidential briefings should be the exception.
- All contact should be recorded and available for audit.
- The rules on gifts and hospitality should be followed and alcohol avoided.

I recommend that new guidance must -

- Be in plain English.
- Clarify what information can be shared and the legal or other constraints.
- Contain advice on conducting media meetings including hospitality and alcohol (both should be avoided), and common pitfalls.
- Explain the requirement to keep a brief personal record of media contact.
- Explain the consequences of breaching the guidance or principles.

Appendix A contains some ideas about the kind of guidance that might be useful for police officers and staff. It is intended to provide a starting point and spark discussion.

RECOMMENDATION 6

The MPS must reinforce the public service responsibilities of the Directorate of Public Affairs (DPA) and local communications work. These functions must operate collaboratively and with equal status. The MPS must make better use of alternative routes for communicating with the public and there must be a predisposition to release much more information than in the past both to the external and internal audience.

SUPPORTING ADVICE

The DPA need to develop a long-term plan for improving media relationships, which should sit alongside the work of the Public Information Champion.

This planning should include a review of how communications staff throughout the MPS should be organised to increase the capacity of this section of the workforce.

The flow of information needs to be improved by communicating more openly wherever possible and not by closing down contact by using narrow lines, declining to comment or using sub judice arguments as blanket responses.

Trust in, and fair access to, information should be improved by -

- Making fair access to information a priority for the DPA without compromising the trust placed in press officers and journalists to handle information confidentially when necessary.
- Reinforcing standards on disclosure. Information should reach the media on its own merits and must never be traded to minimise damage or achieve some other advantage to the MPS.
- Achieving greater transparency and preventing a culture where deals or favour-trading can flourish.
- Accepting negative headlines from time to time.

The links between local communications staff and the corporate media function need to be improved to achieve a corporate standard for staff involved in communications work,

including those at Borough level. This might include creating a single professional structure, recognised career pathways, standard role profiles, and a commitment to working as a team.

RECOMMENDATION 7

The MPS must create an environment where the improper disclosure of information is condemned and deterred. Senior managers should make messages of deterrence strong and effective. Where leaks cannot be proved to the evidential standard required for a criminal prosecution, robust management action should nevertheless be pursued. However, whether there has been genuine harm should always be assessed before proportionate action is taken. Investigations should be seen as an important but subsidiary part of a broader preventative approach.

SUPPORTING ADVICE

As part of a broad prevention strategy the MPS should -

- Create an accessible communication plan that provides practical guidance on what is, and **is not,** permitted and remind officers of their obligations to report unethical behaviour and mistakes.
- Provide police officers and staff the renewed opportunity to declare the relationships they have with the media, even if past conduct may not have been transparent.
- Make better use of existing opportunities to remind staff of their continuing responsibilities - for example in training, annual performance review, team meetings and exit interviews.
- Ensure that internal arrangements for reporting improper conduct are trusted and that those who report 'in good faith' are supported.
- Ensure that the public complaints system picks up patterns of unethical practice involving disclosure to the media.
- Increase the analysis of complaints and discipline cases so that management information is more readily available, recognising the need to cross-reference with data on gifts and hospitality, business interests and declarable relationships.

To deter those who improperly disclose information, enforcement activity needs to continue. In particular the MPS should -

- Assume that leaks are capable of investigation and create that expectation; assess allegations in terms of the seriousness of the impact and investigate proportionately.

- Continue to mount criminal investigations where necessary, but for other cases be more active in taking and publicising management action.
- Use tactics that provoke changes in behaviour, for example wider use of inclusion agreement forms,[29] routine requests for disclosure of media contact records, or requiring statements where a leak investigation has identified a probable originating department.
- Ensure that audit systems identify vulnerability to improper disclosure to the media and that the data is used to inform action.
- Deal with breaches of the media policy and demonstrate that action has been taken.
- Publicise information about the level of enforcement activity being undertaken and any discipline or judicial proceedings which follow.

SUMMARY

This inquiry has identified a range of problems in the relationship between the MPS and the media which require urgent action.

I recommend greater openness in providing information to the public, much of which will be through the media. The two new roles which I suggest - public information and integrity and ethics champions - will drive the change, making media contact **permissible but not unconditional.** Unequivocal and sustained leadership must be given.

[29] The process whereby police officers and staff sign to confirm obligations relating to confidentiality.

APPENDIX A: IDEAS FOR PRACTICAL GUIDANCE

Things to remember when you have contact with the media -

Remember you are constrained by the law - The Children and Young Persons Act 1969, the Magistrates Court Act 1980, the Contempt of Court Act 1981, the Police and Criminal Evidence Act 1984, the Data Protection Act 1998, the Official Secrets Act 1989, the Misconduct in a Public Office Guidance, the Police (Conduct) Regulations 2008, the Bribery Act 2010 and the Police Staff Discipline Procedures - don't break it.

- Public understanding of crime, policing and the courts is a key factor in confidence. If reporting is inaccurate, and inflammatory, confidence in the police can be damaged.
- Most journalists try to do an honest job. However, the media can be unruly and there are risks – not usually to life and limb, but to reputation - in dealing with it.
- Remember: **Contact is permissible but not unconditional.**
- Certain information may be provided to the media by **all** police officers and staff, for example MPS key messages. If in any doubt, talk to your line manager or the press office.
- If you are below the level of Inspector (and the equivalent level police staff) you are permitted to have contact with the media on other issues **providing you have the permission of your line manager and it is about things for which you have responsibility.**
- For police officers and staff above this level it will be **usual** for contact with the media to be agreed with a line manager.
- The presence of a media or communications officer is not a requirement but should always be considered.
- Alcohol is a risk. Police could ban alcohol in media dealings as some journalists do not practise abstinence. Discipline and common sense are a better approach.
- There is a difference between the offer of a pint of beer and the offer of £500 to check the PNC. The first calls for judgement and will usually be declined. The second is an invitation to be corrupt and must be reported immediately.

What is the role of the press, media or communications officer?

Press offices and communications departments are staffed by professionals – including former journalists – who handle the bulk of routine media contact seven days a week, 24 hours a day. They are the experts, and key advisors for police officers and staff. They should always play an important role in sensitive inquiries or major incidents. They regularly release information, sometimes working with Freedom of Information departments. If you are approached by journalists you are entitled and encouraged to ask them if they have spoken to the press office.

Why not leave all media contact to the press officers?

There are simply not enough to handle the demand and to be on top of every detail. They concentrate on high-profile cases, press conferences and informing journalists at crime scenes. They will advise police officers and staff about when it is appropriate to talk directly to the media.

How do you react to a media approach?

The response should be measured. Reporters have deadlines, yes, but you should not be rushed. If you know the reporter, is he/she sensible and trustworthy? There is no substitute for this experience. If the answer is yes, you are entitled to talk with a degree of confidence. If you don't trust or know them, be wary and certainly don't go into areas you don't want to see in the public domain. If you don't know the reporter, take a number and seek guidance. Always call back if you say you will, even if it is to be ultra-cautious. Make a list of the questions you are not prepared to answer, for instance, personal details of a victim.

What do you tell the media?

Over and above the core facts, you may be entitled to talk in greater detail about the impact of a crime or incident on the victim or community, any pattern or wider problem it relates to, how common or rare it is, and police action. Police ask the public to tell them about crime and the evidence suggests that, in return, they are receptive to information showing that the police and courts are doing something about it. In short, try to give the reporter a rounded picture.

What you shouldn't do

Don't respond to the call with a 'No Comment' and then put the phone down. And never mislead. You **will** be found out. If you know certain facts should not be released, such as the name of someone arrested, sensitive details that victims don't want released, the name of a juvenile, or indications of an informant, then don't release them. Press officers will advise you.

After you have spoken to the media

Make a brief personal note of the information you have given. Your line manager may ask for it or it may be dip sampled. There may be circumstances where a note is not necessary, for example if a press officer is dealing with administrative enquires or an officer is delivering multiple briefings that are all logged by the press office. If it's not recorded elsewhere, you need to make a personal note of what you said.

Press officers won't expect you to give them a transcript. Do let them know of any important facts, over and above the news release, that you've given out. If it's something that will generate headlines, they need to know.

Play the long game

Journalists rarely write exactly what the police want, particularly the official 'line'. They will concentrate on the human colour and drama, and seek out any controversy. However, you can guide them towards accuracy, and a sense of proportion. Don't underestimate the contribution to public confidence of a story in which the cops get the villains.

Be proactive (a banned police jargon word, by the way!)

If you have a good story, bring it to the attention of the press office **in plenty of time.** Nothing irritates press officers more than a tea-time call from an elated officer, near the Crown Court, about life sentences in a case which ended that afternoon. It's too late to make the papers.

Personal dealings with the media – accompanied by a press officer, or alone?

Weigh up the risk. If you are talking to the media in a press conference or briefing, in a police station, with press officers present, you are in a fairly low-risk environment. If you invite a reporter to your office, with a press officer present, it is still relatively low-risk; meeting the reporter in a coffee bar, with a press officer, is similar. But, as we know, press officers cannot be everywhere all the time, so should you meet journalists alone? The answer is yes, at times, because the amount of face-to-face contact between police and the media would fall dramatically, particularly at local level, if you could only do it with a press officer around. You'd get log-jams and you might be frustrated when you want to get a good case out.

But without a press officer it is riskier, think about taking a colleague with you. Meeting a journalist in a police station or incident room is best practice. It is tea and coffee territory. It also gives you the freedom to call in someone else who understands the detail. The one-to-one in the coffee bar is the next step. For all these types of meetings, make a brief personal note of the information you have given. Other meetings can be high risk.

The pub, bar or restaurant

Alcohol is a fraught issue, and may be seen as inappropriate hospitality. In the media, drinking related to work is less and less common. Drinking loosens tongues, so common sense is needed -

- Mixing the media with alcohol is not banned but should be an uncommon event.
- You know you shouldn't drink at lunchtime, or on duty. Off duty, for example at the end of a sentencing day may be different, but you still need to use your judgement.
- Be prepared to pay your way, or don't go down this route.
- Log these encounters and let the press office know if you've given out any headlines.
- Carry this sensible, proportionate approach – the occasional social/semi-professional encounter, with alcohol, but no carousing – through your career. It will serve you well.

You may still be criticised

Certain elements of the media, some defence lawyers and some politicians may still criticise the way the police relate to the media. The police will be criticised as well if they retreat into a bunker of secrecy –'damned if they speak to the media and damned if they don't'. The risk can be reduced by making sure you are even-handed. Don't exclude the 'difficult' journalists from events or briefings. It will be more difficult for them to criticise if

they are part of the usual meetings. Indeed, if they understand more, they may be less difficult.

On or off the record

Always agree the ground rules before you start talking to a journalist. You can relax the rules later but it's difficult to impose restrictions after you've let the cat out of the bag.

If it's 'on the record' the information will be used and you will be quoted. If the reporter says it will be 'off the record', ask what that means. If you are happy for the facts to be used but don't want to be quoted, then you are giving an unattributed briefing, which should usually be attributed to the MPS, never 'a police source' or an 'insider'. This is because journalists love to quote 'sources' - it gives the impression that they are 'in the know'. But the frequent appearance of the phrase 'police source' can suggest to the public and to officers and staff in the MPS that information was leaked when in fact it was offered perfectly legitimately. If, in exceptional circumstances, you do not want to be quoted by name - perhaps because you are in a sensitive role - suggest a phrase which implies an authorised MPS individual. In the United States - where precise attribution is taken seriously - a newspaper might say: "An officer who asked not to be named because of the sensitivity of his current security-related role." If you are withholding your name simply because you're not sure you will be quoted accurately, ask the reporter to read the quote back to you and make clear that those words - and only those words - are what you're agreeing to. Next time you won't be helpful to a reporter who misquotes you.

If you want a reporter to understand, and be prepared for a story, but to hold fire on publication, make clear you're supplying information under embargo - 'not for use' until a time you've set. This is common for court case background briefings but don't overdo it elsewhere. Reporters can forget what they've promised to sit on.

Reacting to inaccuracies

There will inevitably be police-media disagreements over the way information is reported. Bear in mind -

- Reporters can be inexperienced, naïve, rushed or slapdash. If you feel the things you have said have been mistreated but suspect this wasn't intentional, you will be wary next time but you may find that the reporter, or newspaper, when told of

the mistakes, will learn a lesson. At local level, a quiet chat with the editor or news editor may improve the accuracy of future reports. They **need** you.

- If you talk to a reporter in good faith and they misquote you, or mistreat your information, and you believe it is deliberate or reckless, then avoid that reporter in the future, and mention the experience to your press office and colleagues.
- If, as can happen, the reporter is honest but you feel the newspaper is mistreating information for whatever reason, be reluctant to deal with anyone from that paper. A collective approach - involving your press officer and perhaps a senior officer - is the best way here. The paper may disagree with police objections - and may have a point, because the police are not always right. Usually, in such cases, the air will be cleared and police officers can return to professional engagement with reporters.
- Own up to mistakes. Officers and staff who make mistakes 'in good faith' will be supported by the MPS.

Ten tactics used by some in the media. Watch out -

1. Alcohol. Late-night carousing, long sessions, yet another bottle of wine at lunch – these are all long-standing media tactics to get you to spill the beans. Avoid.

2. Flirting. Often interlinked with alcohol. Designed to get you to drop your defences and say far more than you intended. Be careful.

3. "I'll make it worth your while." If you think they mean money, say no and beat a hasty retreat. Make sure the press office and Department of Professional Standards know.

4. "A source told me the name of the man you arrested. Can you confirm the spelling?" Say no. This could be a tactic to get you to confirm a name they have been given from elsewhere so they can print it. It may be a guess, or it could be a ruse.

5. "I'll be sacked if I miss the deadline in ten minutes. You've got to tell me." Don't be rushed. "If you don't help me, I'm going to write a really knocking story." They'll probably knock you anyway. Don't give in to threats.

6. "Can you slip me a picture? The family said it's OK?" Did they? Does it meet the rules for disclosing pictures? What does the press office say?

7. You are on a highly sensitive investigation and the Senior Investigating Officer warned you of the dire consequences if you talked to the media, then wouldn't it be very foolish of you to leak?

8. As a constable or sergeant, or scenes of crime officer, you may know more than your inspector or superintendent, but if you don't get permission to deal with the media you put yourself at risk.

9. Don't get sucked into the hurricane. Many of those who criticise police for 'leaking to the media' have never watched the media descend, like a tropical storm, on a town/village/crime scene, laying bare every possible fact. They **WILL** establish the name and life-story of the suspect. If you've agreed an approach to certain information with your press office, stick to it and record it. You can then defend yourself against leak allegations.

10. It may help to assume you are being recorded when you talk to journalists.

Dealing with risks: an example scenario from crime scene to conviction

1. The crime scene

You are a junior officer present at the scene of a serious crime - perhaps a response team officer on a cordon, or a Borough DC conducting initial enquiries. The event has attracted media attention and reporters are gathering around. They want to talk to you. This situation is **HIGH** risk. Assisting the reporter may have repercussions which damage the inquiry. It is also high risk because if the Senior Investigating Officer (SIO) who takes over the inquiry finds out you have talked to the media, you may face disciplinary action.

Advice: *Inform the SIO, or most senior officer present if one is yet to be assigned. They may be willing to conduct an ad hoc briefing.*

You are the senior officer present at the scene and the journalists are referred to you.
This is **LOW-MEDIUM** risk – relatively **LOW** if you have a press officer present and **MEDIUM** if you don't.

Advice: *If you have a press officer available, agree a rough 'script' and ask the press officer to take notes. If you are alone, work out your thoughts in advance and get another officer to take notes. Again, set the ground rules. NB: Be a little wary if you're approached by a lone reporter you don't know. Ask to see the press card and, if necessary, take a minute to check with your media office. It's wise to know who you're talking to. Afterwards make a note.*

2. The investigation

You are a junior member on the Major Investigation Team which has taken over the inquiry. A journalist contacts you - either by phone or in person - and asks you to help. This is **HIGH** risk, and not a common event. It is high risk because you may not have the full picture known to the SIO. Providing information to the journalist may jeopardise the investigation.

Advice: *Even if you trust the reporter, politely decline to discuss the case, and direct them to the SIO or press office. Inform the SIO/press office about the approach. It may be the SIO does want to assist the reporter; but it is his or her choice.*

3. The Community Police Officer

You are the Safer Neighbourhoods Sergeant for the ward where the crime was committed. You've just addressed a local ward panel or public gathering about local priorities when a reporter from the local weekly paper approaches to ask questions about the serious crime on your ward. The reporter has a press card. This is situation is **MEDIUM** risk.

Advice: *Be wary of discussing wider issues - such as serious crime investigations - which are not your area of responsibility. Refer the journalist to the press office. Public meetings are usually open to reporters, so this should have been anticipated. Have you discussed this with your line manager and got permission to talk to local reporters? If not, you should. It's unlikely there'll be a press officer present so you will have to handle this on your own. You are an expert on local crime and anti-social behaviour issues. You know what you're talking about. As long as you stick to areas you are responsible for, and know about, you will be OK. Afterwards make a note.*

4. The media appeal

You are on the investigation team and you've just made a formal appeal via the media, facilitated by a press officer. The aim is to get witnesses to come forward. You are approached afterwards by journalists who want to know a bit more. This situation is a relatively **LOW** risk and is not uncommon.

Advice: *You should have anticipated this - the press release will not always include every fact you are willing to disclose. Ensure you know what information must not be disclosed before the press release, by talking with the SIO. With the press officer, you should be able to offer some background information. Make sure you establish the ground rules for this further chat. Afterwards make a note.*

5. The follow up call

You get a call from a journalist the following day, as your details were on the press release.

This is relatively **LOW** risk because you offered your number and this was likely to happen. You know the facts you're willing to disclose.

Advice: *Talk to the reporter. Afterwards make a note.*

6. The anniversary appeal

You are making an appeal, a month after the crime, at the scene. Some reporters ask whether you'd like to go for a pint.

This is **MEDIUM-HIGH** risk, principally because it might undermine the investigation.

Advice: *Don't go for a pint. If they have some questions, try – with or without the press officer – to answer those you can and say clearly what information you cannot provide. Afterwards make a note.*

7. The trial

It is months later, at Crown Court, and you have just seen the criminals jailed. The same group of reporters have been following the case from the start. They haven't abused your trust at briefings in the early days. They're happy with their 'backgrounders.' They ask you and your team to join them in the pub.

This is generally a **MEDIUM** risk; it is **HIGH** risk if it involves alcohol.

Advice: *If it is late in a long, successful day, with reporters who have 'lived' the case with you, consider joining them, with your team. Remind the team to stick to the case just finished, not the interesting new one you've just picked up. Be willing to pay your way. If you can help them tell the story accurately, and forge relationships which might assist you in appealing for witnesses in the future, the benefits can outweigh the risks. Afterwards make a note.*

APPENDIX B: REFERENCE MATERIAL

List of material which I have consulted in researching this report.

I have also read a large volume of relevant press cuttings which I have not listed here.

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APPENDIX C: LIST OF THOSE WHO HAVE PROVIDED INFORMATION

Ibrar	Ahmed	Muslim Police Association Representative, MPS
Sue	Akers	Deputy Assistant Commissioner, Specialist Crime, MPS
Chris	Allison	Assistant Commissioner, Central Operations, National Olympic Security Co-ordinator, MPS
Roger	Baker	Her Majesty's Inspector for the Northern Region, HMIC
Ailsa	Beaton	Director of Information, MPS
Steve	Bending	Borough Commander, Hackney, MPS
Noel	Beswick	Detective Inspector, Homicide & Serious Crime, MPS
Paul	Brewster	Police Sergeant, Hackney Borough Improvement Team, MPS
Chris	Bryant	MP, Rhondda
Hamish	Campbell	Detective Chief Superintendent, Homicide & Serious Crime, MPS
Alistair	Campbell	Senior Information Officer, MPS
Shami	Chakrabati	Director, Liberty
Samantha	Charles-D'Cruz	Media & Communications Manager, MPS
Leon	Christodoulou	Police Sergeant. Greek Staff Association Representative, MPS
Michael	Clark	Higher Performance Analyst, People Services, MPS
Tanya	Clarke	Press Officer, MPS
Siobhan	Coldwell	Head of Policing Policy, Scrutiny & Oversight, MPA
David	Cook	Retired Detective Chief Superintendent, MPS
Dr Nina	Cope	Director, Territorial Policing Development Programme, MPS
Catherine	Crawford	Chief Executive, MPA
Gary	Dalby	Detective Sergeant, Homicide & Serious Crime, MPS
Justin	Davenport	Crime Reporter, The Evening Standard
Bryan	Davidson	Detective Inspector, MPS
Nick	Davies	Freelance Journalist
Amrit	Dawson	Project Manager, People Services, MPS
Krzysztof	De Berg	Polish Association Representative, MPS
Maxine	De Brunner	Commander, Territorial Policing, MPS

Maninder	Desoura	Co-ordinator Staff Associations, MPS
Cressida	Dick	Acting Deputy Commissioner, MPS
Jill	Dimartino	Volunteer Cadet Manager, Hackney Borough Improvement Team, MPS
Baroness Dee	Doocey	Deputy Chair, MPA. London Assembly Member
Dick	Fedorcio	Director of Public Affairs, MPS
Guy	Ferguson	Borough Commander, Sutton, MPS
Philippa	Foster-Back	Director, Institute of Business Ethics
Pete	Fraser-Brown	Detective Sergeant, Westminster, MPS
Joe	Garner	Deputy CEO, HSBC
Tor	Garnett	Detective Sergeant, Hackney Borough Improvement Team, MPS
Neil	Garnham	Queens Counsel. Counsel for Metropolitan Police Service, Leveson Inquiry
Andy	Garrett	Police Sergeant, Disability Staff Association Representative, MPS
Stuart	Gibson	Senior Disclosure Manager, MPS
Deborah	Glass	Deputy Chair, IPCC
Tim	Godwin	Former Deputy Commissioner, MPS
Brian	Gordon	Police Sergeant, Hackney Borough Improvement Team, MPS
Christopher	Graham	Information Commissioner
Catriona	Green	Media & Communications Officer, MPS
Chris	Greenwood	Crime Reporter, Daily Mail
Eddie	Hall	Detective Sergeant, Strategy, Performance & Professionalism, MPS
Nick	Hardwick	HM Chief Inspector of Prisons. Formerly Chair, IPCC
Stephen	Harlow	Detective Inspector, Greater Manchester Police
Richard	Heselden	Detective Chief Superintendent, Internal Investigations, MPS
Steve	Heywood	Assistant Chief Constable, Greater Manchester Police
Bernard	Hogan-Howe	The Commissioner, MPS
James	Holman	Transgender Staff Association Representative, MPS
Matthew	Horne	Detective Chief Superintendent, Strategy, Performance & Professionalism, MPS
Dr Kitty	Hung	Senior Business Systems Analyst - Olympics, MPS

Julian	Hurst	Media & Information Manager, Bromley, MPS
Halil	Huseyin	Police Constable. Chair, Staff Association Forum, MPS
Mike	Hyslop	Detective Sergeant, Strategy, Performance & Professionalism, MPS
Sir Simon	Jenkins	Chairman, National Trust. Columnist
Boris	Johnson	Mayor of London
Jenny	Jones	Member, MPA. London Assembly Member
Rob	Jones	Superintendent, Chair, Hackney Borough Improvement Team, MPS
David	Jordan	Director, Editorial Standards, BBC
Mark	Kandiah	Detective Superintendent, Homicide & Serious Crime, MPS
Stephen	Kavanagh	Deputy Assistant Commissioner, ACPO & Support Command, MPS
Helen	Kennedy	Information Officer, MPS
David	Kennett	Detective Sergeant, MPS
Peter	Laverick	Detective Superintendent. Head of Intelligence, Strategy, Performance & Professionalism, MPS
Sandra	Laville	Crime Reporter, The Guardian
Chris	Le Pere	Detective Chief Inspector, Strategy, Performance & Professionalism, MPS
Adrian	Lee	Chief Constable, Northamptonshire Police. Portfolio Lead for Professional Ethics, ACPO
Carrie	Lee	Senior Information Officer, Press Bureau, MPS
Lord Justice	Leveson	Chairman, Leveson Inquiry
Peter	Lewis	Chief Executive, Crown Prosecution Service
Paul	Lewis	Journalist, The Guardian
Lan	Lieu	Information Officer, MPS
Sarah	Mahoney	Information Officer, MPS
Kit	Malthouse	Chair, MPA. London Assembly Member
Mike	McGuill	Information Officer, MPS
Katrina	McKeever	Assistant Information Officer, MPS
Anne	McMeel	Director of Resources, MPS
Ian	McPherson	Former Assistant Commissioner, Territorial Policing, MPS
Clive	Milner	Chair, Newspaper Publishers Association

Gary	Moore	Detective Constable, Hackney Borough Improvement Team, MPS
Caroline	Murdoch	Commissioner's Chief of Staff, MPS
Lizzie	Murray	Information Officer, MPS
Majella	Myers	Director, People Services, MPS
Nedge	Nedjdet	Turkish Police Association Representative, MPS
Sir Denis	O'Connor	Her Majesty's Chief Inspector of Constabulary, HMIC
Sean	O'Neill	Journalist, The Times
Sir Hugh	Orde	President, ACPO
Mark	Ottowell	Communications & Media Manager, Safer Transport, MPS
Simon	Ovens	Chief Superintendent, Westminster Borough, MPS
Lynne	Owens	Assistant Commissioner, Central Operations & Specialist Crime, MPS
Bronwen	Powell	Detective Constable. Chinese & South East Asian Association Representative, MPS
Bevan	Powell	Black Police Association Representative, MPS
Amy	Quirk	Detective Sergeant, Hackney Borough Improvement Team, MPS
David	Rendall	Police Constable, MPS
Sam	Richardson	Police Constable, Hackney Borough Improvement Team, MPS
Stephen	Rimmer	Director General, Crime & Policing Group, Home Office
Alan	Rusbridger	Editor, The Guardian
Asad	Saeed	Police Community Support Officer, Camden, MPS
Bob	Satchwell	Executive Director, Society of Editors
Mat	Shaer	Inspector. Jewish Association Representative, MPS
Tim	Shields	Chief Executive, London Borough of Hackney
Ruth	Shulver	Senior Information Officer, Corporate Office, MPS
Mark	Simmons	Deputy Assistant Commissioner, Strategy, Performance & Professionalism, MPS
Peter	Smyth	Chair, Metropolitan Police Federation, MPS
Edward	Solomons	Director, Legal Services, MPS
Peter	Spindler	Commander, Strategy, Performance & Professionalism, MPS
Professor Betsy	Stanko	Deputy Head, Strategy & Performance, MPS
Ed	Stearns	Assistant Director, Directorate of Public Affairs, MPS

John	Steele	Territorial Policing Communications, MPS
Sir Paul	Stephenson	Former Commissioner, MPS
Mike	Sullivan	Journalist, The Sun
Alistair	Sutherland	Chief Superintendent, Force Firearms Unit, MPS
Caroline	Taylor	Senior Information Officer, MPS
Eddie	Townsend	Information Officer, MPS
Andy	Trotter	Chief Constable, British Transport Police. Portfolio Lead for Communications Advisory Group, ACPO
John	Twomey	Crime Reporter, The Express
Rt Hon Keith	Vaz	Chairman, Home Affairs Select Committee, House of Commons. MP, Leicester East
Gurpal	Virdi	Detective Sergeant. Sikh Association Representative, MPS
Colin	Walden	Communications Manager, MPS
Paul	Warner	Police Constable, Sutton, MPS
Tom	Watson	MP, West Bromwich East
Chris	Webb	Deputy Director, Public Affairs, MPS
Carl	Welham	Interim Assistant Chief Executive, London Borough of Hackney
John	Whittingdale	Chairman, Culture, Media & Sport Select Committee, House of Commons. MP, Maldon
Helen	Williams	Senior Female Police Staff Association Representative, MPS
Brian	Wilson	Freedom of Information Officer, MPS
Sue	Wright	Police Sergeant, Hackney Borough Improvement Team, MPS
John	Yates	Former Assistant Commissioner, Specialist Operations, MPS
Lee-Jane	Yates	Police Sergeant. Chinese & South East Asian Association Representative, MPS
Joanna	Young	Chief Superintendent. Secretary, Superintendents' Association, MPS

ACPO - Association of Chief Police Officers

HMIC - Her Majesty's Inspectorate of Constabulary

IPCC - Independent Police Complaints Commission

MPA - Metropolitan Police Authority

MPS - Metropolitan Police Service