

Mike Cunningham, Chief Constable of Staffordshire Police and lead of ACPO Professional Standards Portfolio:

Submission of Evidence to Leveson Inquiry

In pursuance of Section 21(2) of the Inquiries Act 2005 and in response to correspondence dated 23rd January 2012 of Ms Sharron Hiles, Senior Assistant Solicitor to the Inquiry

13th February 2012

(1) Who you are and a brief summary of your career history.

I have 25 years policing service, having joined Lancashire Constabulary in 1987. I served in a number of operational roles across the constabulary area before becoming Blackpool Divisional Commander in 2002. In November 2005 I was appointed as Assistant Chief Constable taking responsibility for specialist operational policing across Lancashire. I had significant involvement in the development of neighbourhood policing in the county. My portfolio also included specialist operations, the investigation of serious and organised crime, and counter-terrorism.

I was appointed Deputy Chief Constable of Lancashire in August 2007. I also took the national lead for Counter Corruption as head of the ACPO Counter Corruption Advisory Group (ACCAG), which formed part of the wider ACPO Professional Standards Portfolio.

I served as Deputy Chief Constable of Lancashire Constabulary for two years before my appointment as Chief Constable of Staffordshire Police in September 2009. I took the lead of the ACPO Professional Standards Portfolio in June 2011.

(2) What is the remit of your role as lead on ACPO's professional standards portfolio?

The ACPO Professional Standards Portfolio is part of the over-arching Workforce Development Business Area¹ and is dedicated to raising and maintaining professional standards in the police service. In broad terms, my remit as portfolio lead extends to:

- (i) strategic responsibility to identify and address emerging threats and respond to national issues which impact on the police service's professional standards
- (ii) leading for ACPO on the development of preventative strategies to combat risk and emerging threats to operational policing and the reputation of the police service
- (iii) receiving and commissioning the work of the three Professional Standards Portfolio sub-groups, (Complaints and Misconduct, Counter Corruption, and Vetting). To address strategic issues and challenges in response to the ACPO & Serious Organised Crime Agency (SOCA) National Strategic Threat Assessment to UK Law Enforcement from Corruption²
- (iv) identifying commonality with other ACPO business areas, (such as the Ethics portfolio), where reducing instances of and improved handling of public complaints can achieve improved public satisfaction and confidence through the quality of service provision, and overseeing the integration of professional standards issues into the strategies, policies and procedures of other business areas as appropriate

¹ National policing work conducted through ACPO is led within Business Areas, each taking lead responsibility for a broad area of policing and headed by a serving chief officer. The Business Areas lead the direction and development of policing policy in that area, working with HM government and external stakeholders. Under each Business Area sit Portfolios, each led by an individual chief officer who acts as the national lead for a specific or range of issues. The Workforce Development Business Area is one such area. When the need arises, Portfolio Leads will work with policing colleagues and relevant external stakeholders to develop guidance and practice advice.

² last published in May 2010 and due for re-issue in 2013

- (v) identifying opportunities to more closely integrate unsatisfactory performance of officers and staff into professional standards, with a clear emphasis on ethical policing behaviour as opposed to mere compliance with regulations, and to improve public confidence in the police service through organisational learning
- (vi) monitoring ethical standards as they relate to aspects of policing such as the use of discretion, case management and the administration of justice, the use of force and other policing powers, custody and detention matters, gifts and gratuities, secondary employment and business interests, information confidentiality, personal standards of conduct and cooperation with partner agencies

To discharge these responsibilities, I chair a quarterly meeting of the ACPO Professional Standards Portfolio which comprises the chief officer leads of the ACPO Complaints and Misconduct Working Group, ACPO Counter Corruption Advisory Group (ACCAG) and the ACPO Vetting Group together with staff association leads. The Independent Police Complaints Commission (IPCC) is represented by the Chief Executive. Special advisers from within the service are invited as appropriate.

(3) Has ACPO issued guidance to the Police Service on the acceptance of gifts and hospitality by police officers and police staff, whether from the media (in all its forms) or otherwise.

If so, please specify, and:

a. What are the key guidelines/expectations?

b. To what extent is the guidance followed by police forces, including the Metropolitan Police Service?

c. Do police forces, including the Metropolitan Police Service, seek advice from ACPO on the interpretation of the guidance or provide feedback on it?

The ACCAG Guidance for the Investigation of Corruption³ first published in 2003 and last formally revised in 2006⁴ recognised one of the precursors or first steps to corrupt practices may be an officer accepting an inappropriate gift or gratuity from a member of the public or a colleague. The guidance identified some common factors as potential corruptors, including former police officers, particularly those in the security or private investigation sectors, family members and friends with criminal associations, informants and other criminal contacts established through policing activity. The media was also identified as a source of corruption when confidential, sensitive or secret information is sought by journalists, in return for financial inducements or payment through gifts and hospitality. This ACCAG guidance has been adopted by all chief officers.

Neither ACPO nor ACCAG has issued any more specific policy or practice guidance on the receipt or acceptance of gifts and gratuities. Most if not all forces have policies in place which make clear that neither police officers nor members of police staff should solicit the offer of any gift, gratuity, favour or hospitality in any way connected to or arising from their role within their respective forces, whether on duty or off duty.

These policies require that police officers and members of police staff must declare in writing to an appropriately senior manager the details of any unsolicited gift, gratuity, favour or hospitality offered in the course of their duties or in any way connected to or arising from their role within the force.

These policies invariably make clear the individual responsibility on officers, members of the Special Constabulary and members of police staff (including, contracted, temporary, agency and casual staff and all voluntary staff) to comply with these procedures in order to ensure personal and professional integrity; to prevent unwarranted allegations of corrupt practices or improper relationships with members of the public or corporate bodies; and to prevent

³ Paragraph 2.1.6

⁴ This guidance is currently under review as part of ongoing ACCAG work

any perceptions of a lack of impartiality as a police officer or a member of staff or representative of their individual forces.

ACCAG is currently considering the implications of the Bribery Act 2010 within the context of counter corruption measures.

Gifts and gratuities policies are intended to provide instruction and guiding principles to enable staff to make correct decisions and to act in compliance with widely recognised Standards of Professional Behaviour as described in the Schedule to the Police (Conduct) Regulations 2008 and related Home Office guidance (026/2008) on police unsatisfactory performance and misconduct procedures, and Standards of Professional Behaviour for Police Staff, as agreed by the Police Staff Council (PSC).

The relevant standards for Police Officers and Police Staff are described under that relating to Honesty and Integrity:

Police officers never accept any gift or gratuity that could compromise their impartiality. During the course of their duties police officers may be offered hospitality (e.g. refreshments) and this may be acceptable as part of their role. However, police officers always consider carefully the motivation of the person offering a gift or gratuity of any type and the risk of becoming improperly beholden to a person or organisation.

It is not anticipated that inexpensive gifts would compromise the integrity of a police officer, such as those from conferences (e.g. promotional products) or discounts aimed at the entire police force (e.g. advertised discounts through police publications). However, all gifts and gratuities must be declared in accordance with local force policy where authorisation may be required from a manager, Chief Officer or Police Authority to accept a gift or hospitality. If a police officer is in any doubt then they should seek advice from their manager.⁵

⁵ Paragraphs 1.15 & 1.16, Home Office guidance (026/2008) on police unsatisfactory performance and misconduct procedures

I can confirm this guidance is adopted by all police forces, including the Metropolitan Police Service.

I can also confirm that all forces (including the Metropolitan Police Service) have mechanisms by which advice and guidance on interpretation can be provided. There are formal regional structures for Heads of Professional Standards Departments which underpin and support each of the three ACPO Professional Standards Portfolio working groups. In addition, the Police Federation and the Police Superintendents' Association of England and Wales (PSAEW) have misconduct leads and Panel of Friends with an ability to seek guidance from and to influence the formulation of policy and procedure to drive forward improvements in professional standards.

(4) To what extent do police forces, including the Metropolitan Police Service, seek advice from ACPO on the acceptance of gifts and hospitality by police officers and police staff?

All forces (including the Metropolitan Police Service) have mechanisms by which advice and guidance on interpretation can be provided. As outlined above, the formal regional structures for Heads of Professional Standards Departments (led by a chief officer) are recognised avenues for lead professionals to seek clarity or advice from ACPO leads and to influence the formulation of policy and procedure to drive forward improvements in professional standards.

In my experience, I would say there are relatively few and certainly infrequent instances of officers seeking clarity from ACPO on the acceptance of gifts and hospitality by police officers and police staff.

(5) What payments (if any) do you consider to be legitimate financial transactions between police personnel and the media?

I do not consider that any level of payment between police personnel and the media is warranted or legitimate in respect of any provision of police held information concerning investigations, operations or responses.

There may be commercial charges that are necessary or justified from either print or broadcast media for the placing of, or promotion of, police generated public or community safety messages. Payment may also be appropriate for other aspects of organisational management, including marketing, branding or advertising copy for recruitment purposes.

(6) What do you consider to be an appropriate level of hospitality for a police officer to accept from the media (if any)

I consider the acceptance of provision of light refreshments as commensurate with the timing and duration of meetings over the course of the working day and in furtherance of routine daily business is a matter of common courtesy and is therefore within the bounds of reasonableness.

(7) Has ACPO issued guidance to the Police Service on restricting police officers leaving the Police Service to work for the media and vice versa? If so, please specify, and:

a. What are the recommended restrictions?

b. To what extent is the guidance followed by police forces, including the Metropolitan Police Service?

c. Do police forces, including the Metropolitan Police Service, seek advice from ACPO on the interpretation of the guidance or provide feedback on it?

ACPO has not issued any specific guidance to, or on behalf of, the police service to officers who leave the service to work for the media, or to persons leaving the media to work for the police service.

(8) To what extent do police forces, including the Metropolitan Police Service, seek advice from ACPO on limiting police officers leaving the Police Service to work for the media and vice versa?

I am not aware of any specific request to ACPO from individual forces or from the Metropolitan Police Service on any limitations or restrictions on officers leaving the service to work for the media and vice-versa.

(9) Has ACPO issued guidance to the Police Service on monitoring and regulating associations between police personnel and persons working for the media (in all its forms)? The Inquiry is interested not just in relationships involving the provision of information to the media, but also where a police officer or member of police staff has an associate, including family members and friends, who works for the media. If so, please specify, and:

a. What are the key guidelines/expectations?

b. To what extent is the guidance followed by police forces, including the Metropolitan Police Service?

c. Do police forces, including the Metropolitan Police Service, seek advice from ACPO on the interpretation of the guidance or provide feedback on it?

The ACPO Communications Advisory Group (CAG) under Chief Constable Andy Trotter of British Transport Police, issues formal ACPO guidance on relationships between the service and the media. This guidance was last

issued in October 2010 with the aim of widening the shared understanding between the media and the police service. It is adopted by all forces.

The guidance aims to encourage a presumption of openness and seeks to promote a consistency of practice by establishing broad principles within a framework upon which individual decisions can be taken and which will stand scrutiny. The guidance outlines the kind of information and co-operation the media can expect from police and identify areas of difficulty to help the media understand the practical or legal restraints under which police media departments sometimes work. The guidelines have been produced with the assistance of the Society of Editors, the Newspaper Society, and the Crime Reporters Association.

This guidance does not extend to monitoring and regulating associations between police personnel and persons working for the media.

(10) To what extent do police forces, including the Metropolitan Police Service, seek advice from ACPO on monitoring and regulating associations between police and media personnel?

I am aware that the ACPO Communications Advisory Group (CAG) is currently in the process of drafting further national guidance on police relationships with the media in addition to the guidance issued in October 2010.

(11) Is ACPO proposing to issue guidance/further guidance in relation to the matters dealt with in questions 3 to 10 above? If so, please provide a copy of the guidance or set out the key guidelines/expectations that are likely to be set out in that guidance.

The ACPO Professional Standards Portfolio is currently engaged in formulating a response to HMIC's review of police relationships *Without Fear*

or Favour, published in December 2011. I anticipate this response will include more definitive guidance to the police service on boundaries of acceptability of gifts and hospitality and will likely commence with the clear presumption that no gift, gratuity or hospitality should ever be sought by any officer at any level within the service. The only hospitality offered that can or should be acceptable extends only to the provision of minimal and ordinary hospitality during the course of any meeting or function and which any reasonable person would consider to be commensurate with common courtesy. I further anticipate that guidelines will incorporate a more standardised approach to existing recording practices to assist transparency and scrutiny.

Whilst reassured that HMIC found no evidence of any endemic corruption in police relationships with the media and reported that the boundaries of acceptable relationships between police and reporters are understood, professional and businesslike, ACPO is not and will not be complacent. We will carefully consider how to lead the service in ensuring absolute clarity about expectations on officers and police staff who have any personal or professional relationship with reporters or media representatives.

12) What is your impression of the culture within the Police Service as a whole in relation to its dealings with the media (the media in all its forms)?

My impression of the culture of the police service as a whole is one of professionalism at both organisational level and operational level. On a daily basis I see evidence of the outcome of highly appropriate contacts and relationships between force corporate communications departments and specialist press officers with journalists and reporters from all aspects of the media, whether local, regional or national. I know senior colleagues to be increasingly adept and confident in assisting the media to carry out their role in a democratic society; to inform the public on aspects of community safety, incidents of crime and disorder and to hold the police to account with increasing transparency. Likewise, I see and hear officers at all operational

levels working with and alongside the media to mutual benefit and to the benefit of the public. However, it is also clear that there are times when police dealings with the media have been less than professional and these instances do huge damage to public trust and confidence.

The concerns that arise, and which have roots in the events of the summer of 2011 and beyond, should properly be viewed in the context of increasing levels of trust, openness and cooperation between the police service and the media. There may have been isolated instances of corrupt and improper practices (and these clearly do exist), but the issue for ACPO in leading the service is to assess and re-align the issue of judgements and further instil a sense of propriety in the formation and maintenance of relationships with the media in general and individual reporters. In short, I describe the existing culture as one which is quite rightly less risk averse than before, and one where there has been increasing levels of confidence amongst officers and police staff in dealing with the media for legitimate policing purposes. To a certain extent, it is perhaps a sign of over-confidence that has led to instances of poor personal and professional associations between officers and media representatives.

I think it is also evident that there are differences between London and the wider regions due to the close proximity of the national media who are based in the capital.

(13) What is your view of the practice of police officers and police staff having “off-the- record” conversations with the media?

If ‘off-the-record’ means the content of any briefing is not for publication or broadcast, then such briefings may in certain circumstances be acceptable so long as they support a legitimate policing purpose, which more often than not will amount to background to existing policing operations or investigations.

If 'off-the-record' means the quote or content is non-attributable to the source, this can and does damage transparency and does the public a disservice as non-attributable can equate to non-accountable. 'Off-the-record' briefings may lead to perceptions of inequality of access within the media and will therefore tend to fuel concerns over inappropriate relationships. The clear danger is that journalists and reporters will thereby seek to nurture and target officers to engage in unaccountable practices and that certain officers may prove susceptible to engaging in improper associations.

(14) To what extent do you believe bribery of personnel by the media is a problem for the Police Service (if at all)?

I believe the out and out bribery of police personnel by the media to be confined to rare and isolated occasions. The standards of professional behaviour outlined by the Police (Conduct) Regulations 2008; the evidenced ability and willingness of the service to have readily identified the potential for corruption from improper associations with journalists and the more recent advent of the Bribery Act 2010 all serve to reinforce HMIC's recent findings that there is no evidence of endemic corruption in police relationships with the media. It also highlights that the service has a proper relationship with the media which for the majority of police forces and individual officers and members of staff is both professional and businesslike.

(15) To what extent do you believe leaks from the Police Service to the media are a problem for the Police Service (if at all)?

ACPO's counter corruption strategies have long identified that the media can be a source of corruption where confidential, sensitive or even secret material is provided for financial inducements or payment through gifts or hospitality.⁶ ACPO recognises the benefits of a strong, professional and ethical working

⁶ ACPO Presidential Taskforce on Corruption: ACPO Corruption Prevention Strategy (1999)

relationship between the media and police forces and that the relationship is co-dependant. However, there is also acceptance and understanding of the inherent risks which police officers and forces are confronted with, in terms of information leakage. The ACPO and Serious Organised Crime Agency (SOCA) Strategic Threat Assessment (2010), "The Threat to UK Law Enforcement from Corruption", highlights the role of the journalist as a potential corruptor, which is a theme that ACCAG intend to develop and explore in light of recent national scandals, and ensure that an accurate intelligence picture of the threat is absorbed into the preparation work for the forthcoming 2013 strategic assessment. Thereafter, this shall serve to inform future enforcement and shape training at both strategic and tactical levels.

(16) What do you consider to be the motivation for police officers and/or police staff to leak information to the media? In other words, what do you consider to be the root cause of such leaks?

There are several such root causes. At one extreme, the improper and unauthorised disclosure of police information can result from corrupt officers who seek personal gain through financial reward. Others may provide information in the misguided belief that they are assisting the media (and thereby the wider public) to become aware of specific instances of criminality or may be exercising poor judgement in seeking to highlight specific examples of good police work in preventing and detecting crime, and are utilising ill-thought through relationships and association with reporters and journalists to do so. There are of course disaffected members of staff, who may be in dispute with their individual force over matters specific to them or that form part of a wider disaffection with how the service is being led or managed, either by senior officers or politicians. Some officers are privately disaffected by what they see as unjust and unfair restrictions on pay and conditions. Some choose to articulate their arguments openly and seek to engage the media in debate to inform the argument. Others may choose to do so from a more circumspect perspective, either anonymously or through inappropriate contacts and leakage of organisational information.

I am aware there are cases of officers who chose to turn to the media to highlight instances of corporate or operational wrong-doing. There are recognised internal means of confidentially reporting integrity matters which are widely available to officers and staff who do not have the confidence to speak outright. Most forces are well advanced with encouraging the effective use of integrity hotlines and confidential reporting, and that ensuing investigations can and do develop to a successful conclusion. It is important ACPO continues to work to reassure staff that this is a legitimate and effective means of identifying wrongdoing.

(17) What safeguards do you consider should be in place to minimise the risk of leaks to the media?

The police service is experiencing unprecedented reform and change programmes. Forces invariably seek to engage officers and staff through periods of organisational uncertainty with structured and properly focussed communications strategies and to involve all levels of the service in the necessary reforms we are experiencing.

Prevention is much more preferable to cure, and whilst leakage of both operational and organisational information occurs, it is never acceptable. I am aware colleagues share my concerns that the enforcement of either the criminal law or misconduct regulations in respect of those who choose to leak to the media for whatever motivation is challenging.

I am conscious that HMIC's *Without Fear or Favour* review reinforced the need for forces to explore options for identifying and monitoring emerging and inappropriate leaks to the media. The response of the police service will be to carefully consider how best to address this issue without causing any unnecessary or overly risk-averse approach which constrains police and media relationships and is ultimately a disservice to the public. In short, ACPO is reviewing the necessary safeguards to minimise the risk of leaks to the media following the HMIC 'Without Fear or Favour' review.

(18) To what extent do you consider that unauthorised disclosures to the media by police officers and/or police staff in practice amount to genuine whistle-blowing as opposed to disclosures for personal gain or unwarranted breaches of confidence?

Please see the response provided in 17 above. Additionally with regard to the motivation of staff some of whom consider themselves to be 'whistle blowing', it is much more preferable for disaffected staff to have their issues resolved by managers in the workplace.

(19) Are you aware of any instances, in the last 5 years, when a police officer or member of police staff has claimed whistle-blowing as a reason for leaking information to the media and/or private detectives? If so (i) how many instances? (ii) What police forces were concerned? And (iii) insofar as you are able, please give details of the circumstances of the claimed whistle-blowing and the outcome of any investigation into the same

I am not personally aware of any specific instances.

(20) Do you consider that any changes should be made to encourage such individuals formally to report their concerns to the organisation rather than informing the media without first giving the organisation an opportunity to deal with the concern? If so, please give full particulars. In particular:

a. Does ACPO have a policy or position on whistleblowing? If so, please explain.

b. What systems do you consider should be in place to educate officers and staff about whistleblowing and, in particular, when it is appropriate to make a disclosure outside their organisation and when it is not?

c. In what circumstances and/or for what purpose/s (if any) is it appropriate for a police officer or civilian employee to provide confidential information to the media?

d. What protections do you consider should be in place to protect genuine whistle blowers?

The issue here relates to the confidence of officers and staff to report wrongdoing. Before outlining the steps taken by the service and each individual force, it is recognised that the term 'whistleblower' can be deeply upsetting to those who genuinely report real or perceived instances of wrongdoing. Forces have formally developed a policy or guidance on professional standards or integrity reporting as part of their respective approaches to encourage honesty and openness amongst police officers and police staff to help provide a highly ethical working environment. Forces provide support and safeguards to any person who provides information or evidence of any undertaking within the force that is unethical or illegal. These procedures aim to create a climate where staff feel a genuine obligation to openness and transparency when reporting breaches of professional standards. Their motivation to do so invariably arises from a desire to maintain the integrity of the police service and with the knowledge that such action will be universally acknowledged as being the right thing to do.

The importance to the service of challenging wrongdoing is specifically catered for within the Police (Conduct) Regulations 2008. One of the ten described Standards of Professional Behaviour relates directly to *Challenging and Reporting Improper Conduct*. Police officers report, challenge or take action against the conduct of colleagues which has fallen below the standards of professional behaviour expected. Police officers are expected to uphold the standards of professional behaviour in the police service by taking appropriate action if they come across the conduct of a colleague which has fallen below these standards. They should never ignore such conduct.

In the first instance, it is desirable that officers and police staff report concerns to their line manager. If they do not feel able to approach a line manager, they

may report the matter through the force's confidential reporting mechanism, or to the Police Authority or Independent Police Complaints Commission (IPCC).

Evidence from forces across the country is clear that confidential reporting is a well-used and healthy means of bringing wrongdoing and instances of a lack of individual or organisational integrity to the attention of professional standards departments.

The service needs to ensure that officers and staff continue to have confidence in the ability of the service to effectively investigate wrong-doing, however it is drawn to the attention of senior officers and professional standards departments. I am confident that procedures are already in place and are well-known and routinely used to enable this to happen.

(21) What levels of awareness and experience are there in the Police Service as a whole of “ media crimes ” such as and in particular: (a) unlawful interception of communications (including the Regulation of Investigatory Powers Act 2000); (b) bribery of officials by the media; (c) blackmail; (d) harassment by paparazzi and journalists; (e) traffic and/or public order offences committed by photographers and journalists pursuing stories; (f) inciting officials to communicate confidential information held by the Police Service / conspiring with them to obtain such information; and (g) crime within media organisations other than the foregoing (e.g. dishonest expense claims).

The events that led to the current concerns over the instances of impropriety between officers and the media and over the service's response to unwarranted and illegal interception of voicemail messages has clearly raised the overall level of awareness of the service as to what constitutes a 'media crime'.

The Metropolitan Police Service in particular has specific experience of unlawful interception of communications in contravention of the Regulation of Investigatory Powers Act 2000.

Forces also have experience of investigative journalists - some acting on behalf of newspapers and broadcasting authorities, others seeking to develop stories with a view to seeking publication - utilising covert surveillance tactics which require authorisation under the Regulation of Investigatory Powers Act 2000. Officers seeking to consider such means of gaining information, developing intelligence or ascertaining evidence would certainly have to do so.

Many if not all forces will have some experience of investigating corrupt or inappropriate relationships between members of a police force and individual journalists or reporters.

Inciting officers to communicate confidential information held by the police service or conspiring with them to obtain such information is infrequent, albeit the threat to the service's reputation and to law enforcement from this is highlighted within the ACPO and SOCA Strategic Threat Assessment 2010.

Instances of reported crime within media organisations other than the foregoing (e.g. dishonest expense claims) are relatively infrequent across the service.

(22) Are you of the view that sufficient priority and resources are given to investigating these offences? If not, why do you consider that insufficient priority and/or resources are given to such investigations?

I am not aware of any view that insufficient priority and resources are given to investigating these offences. Operational responses to individual allegations or reports of crime are largely a matter for individual forces and chief officers and will be balanced alongside competing operational demands. Each force has highly developed tasking and coordinating mechanisms at local level and

at force level for identifying and rationalising priorities and meeting demand for services, whether reacting to reported crime or proactively seeking to address identified concerns.

From an ACPO Professional Standards perspective, the work of ACCAG and the Complaints and Misconduct Working Groups feature highly on force agendas through chief officer leads and through heads of professional standards departments. The service benefits from a national strategic threat assessment which is the result of analysis of trends and data supplied by each force. This strategic work assists each individual force to assess a wider national perspective when assessing impact, risk and harm in allocating resources to challenging investigations.

(23) What is your view of the recommendations contained in the HMIC's recent report "Without Fear or Favour" insofar as they concern relations between the media and the police? If you disagree with any of the findings, please explain why you disagree with the same.

I welcome HMIC's report, its findings, conclusions and recommendations.

Upon the report's publication in December 2011 I responded, on behalf of ACPO, that the police service is a highly accountable organisation which must be responsive and trusted by the public. With a dedicated team to investigate allegations of corruption in each force, we have one of the least corrupt police services in the world. This review bears out research from other bodies such as Transparency International who found no evidence of systemic corruption in UK policing, but individual cases where police officers let their colleagues and the public down.

Leadership has always been an important part of tackling police corruption and the service has worked hard to identify threats and put preventive measures in place. All our relationships must meet the highest standards of integrity and this review highlights the need to continue to develop safeguards

and to keep pace with new developments in information technology which expand the potential for vulnerability to corruptors. Any member of staff, regardless of rank or role, who brings the service into disrepute does huge damage to staff who strive, every day, to deliver a police service with commitment and integrity.

I note the fact that HMIC did not find endemic failings in police integrity, and instances of any malpractice were infrequent. I share the concerns raised that there is all too often an inconsistency in approach to the understanding of boundaries, governance and oversight and to the exercise of judgement around existing controls. This presents challenges to the service to identify and implement more definitive standards and a more consistent approach across forces to bring clarity to expectations as to what is and what is not acceptable.

(24) What is your view of the recommendations contained in Elizabeth Filkin's report "The Ethical Issues Arising from the Relationship Between Police and Media"? If you disagree with any of the findings, please explain why you disagree with the same.

I am conscious that Elizabeth Filkin's review and report was solely focussed on the Metropolitan Police Service, and I am aware that Commissioner Bernard Hogan-Howe welcomed the publication of this report and its findings in January this year and undertook to respond positively to its recommendations.

I endorse the Commissioner's stance as I appreciate that Elizabeth Filkin's key findings are equally as applicable to each and every police force as to the Metropolitan Police Service.

I would add that many police forces are alive to - and have routinely and openly engaged with - social networking media and have well-developed and trusted relationships with all aspects of media and do not over-focus on print

media (key finding and recommendation 1). I should also make clear that many provincial and metropolitan forces have fully engaged with Elizabeth Filkin's concept of media contact *being permissible but conditional* (key finding and recommendation 5).

I fully endorse the report's closing sentence that unequivocal and sustained leadership must be given to contact with the media.

(25) Do you consider that there are different or further steps which could and/or should be taken to ensure that relationships between the police and the media are and remain appropriate? Please explain when answering this question what you consider to be appropriate contact between the police and the media in a democratic society.

The media plays a hugely important and significant role in British society. The concept of a free and independent press capable of holding the police and public authorities to account is as important as providing the means by which the police can inform and warn communities of risks, threat and harm. It also has a role in providing the reassurance needed to enable instances of crime, disorder and anti-social behaviour to be placed in a proper and meaningful context.

Contact with the media at any level across the service should be predicated on legitimate policing purposes; preventing and detecting crime; apprehending and prosecuting offenders; protecting life and property; maintaining law and order; and dealing with threat, harm and vulnerabilities in all of their forms within our communities.

It is a constant challenge to strike the balance between local issues for local communities and place these in the context of national policing issues. We have long been in the business of instilling and promoting public confidence in the police and in our partner agencies and we look to the media to assist us in reassuring communities and helping to deal with perceptions and fear of

crime, which we understand is increasing in spite of the reality of falling levels of crime.

I am not convinced of any requirement for any fundamental overhaul of relationships between the police and the media, but that does not mean that further steps cannot be taken. We have in place relationships borne of trust, understanding, openness and transparency, and it is testament to the professionalism of not only service leaders, specialist press officers and corporate communication departments, but operational officers and staff at all levels across the service, that the isolated instances of corrupt or improper practices are restricted to rare and infrequent occasions.

What we clearly need to do is to ensure a consistency of approach and provide greater clarity on boundaries and expectations and this will be reflected in the police service's response during the course of the coming year.

(26) What different or further changes do you consider should be made, for instance to systems, policies, procedures and training, to ensure that the relationship between the police and the media, locally and nationally, operates in the public interest? Please explain when answering this question what you consider to be the "in the public interest".

The relationship between the police and the media already operates in the public interest. The public are increasingly well informed about all aspects of policing and the environment in which we operate.

The service response to seeking to improve and better define relationships with the media needs to be carefully considered and proportionate. It should recognise and enhance what works well and seek to improve where there is need to do so. The damage done to the service's reputation by the ill-considered and on occasions, illegal conduct of a few and the public scrutiny

this brings is, to a large extent, preventative in itself. ACPO is keen and willing to ensure the service response to concerns highlighted by the Home Affairs Select Committees, by HMIC and others is measured and establishes a more consistent framework of operating principles which will render any divergence much less likely than at any time before.

I am conscious there is no universally recognised definition of what constitutes the public interest. There is a wide-ranging debate, both academic and in other literature, about the public interest and its application in particular situations on the boundary between rights to know, privacy, transparency and openness of public bodies such as the police service.

Public interest is the right of the public to all relevant information that promotes accountability and transparency for policing actions, decisions or operational responses and thereby allows people to become safer, more reassured and better informed about matters of public importance. This is set only against an assessment of a risk of threat or harm to individuals or any group which renders the provision of information to be likely to lead to a risk of threat or harm.

(27) How do you consider the Association of Chief Police Officers could or should help to ensure that relationships between the police and the media, both locally and nationally, are appropriate and operate in the public interest? Do there need to be changes to its role and responsibilities?

In taking responsibility for the service response to the concerns evident about inappropriate relationships between police and the media, I consider ACPO can build upon an already sound relationship that has trust and openness; work already developed by ACPO's Communication Advisory Group and other aspects of ACPO's business areas.

(28) What role do Police Authorities play in the oversight of police relations and communications with the media? Do you consider that it would be in the public interest to make any changes to this role? If so, what changes?

Police Authorities have limited oversight or governance over the operational dealings between police forces and the media. Where issues raised have a potential to adversely affect the force reputation or the ability of the force to deliver an efficient and effective policing service, an Authority will be routinely engaged or consulted by chief officers.

This usually manifests itself in the commissioning of a gold group to provide strategic management to a critical incident. Invariably an integral part of any gold group will be the establishing and monitoring of a communications strategy, and the Police Authority will be routinely sighted and party to such a strategy.

Chief Officers will also engage with their respective Police Authority on all aspects of the communication programme on any corporate or organisational change.

I am not convinced of any over-whelming argument to seek changes to this existing framework.

My office as Chief Constable of Staffordshire Police:

(29) What were your first impressions, upon taking office as Chief Constable of the Staffordshire Police, about the culture of relations with the media which you had inherited?

My first impressions on the relationship between the force and the media on taking up the role of Chief Constable were that they were very similar to my experiences in my previous force, Lancashire. A very traditional, businesslike and professional relationship based on openness, mutual trust, and on an

understanding that we both need each other to be able to do our respective jobs effectively.

In the context of Staffordshire, it is important to point out that these relationships are predominantly with local and regional journalists with whom we have daily contact. There is much less contact with the national media and this usually only happens when responding to specific news events. I would also repeat the points made in my response to question 12 above.

(30) Describe the personal contact which you currently have with the media. The Inquiry would like an overall picture of the type, frequency, duration and content of your contact with the media during your tenure as Chief Constable of the Staffordshire Police. For the avoidance of doubt, the Inquiry would like to know about your contacts with the local and national media.

My contact with the local and regional media is normally very formal and businesslike. I hold an annual meeting with local editors, attended by senior members of my Corporate Communications team, to discuss the continuing relationship between our organisations.

I also hold six monthly media briefings to update local and regional reporters about changes and developments within the force, particularly during this time of significant change. These briefings are formal, 'on-the-record' and are attended by the Police Authority Chairman and Chief Executive and senior members of my Corporate Communications team.

I have also had a very small number of meetings during my tenure, with the editor of the Staffordshire Newsletter (16 April 2010 at the Swan Hotel in Stafford and 1 September 2011 at Police HQ) to explore ways of improving the way we work together. I have also attended the annual, local 'Our Heroes' Gala Dinner and Awards, sponsored by the Sentinel newspaper and Britannia Building Society (22 September 2009, 30 September 2010 and 29 September

2011) to represent the force in a formal capacity. The awards highlight excellent local community safety achievements and support for policing.

I am interviewed by the local media on a relatively regular basis, either proactively or in response to specific requests. This normally relates to local events, developments or issues. Broadly every six months I take part in a BBC Radio Stoke phone-in interview, making myself available to deal with calls directly from members of the public on local policing issues.

Such interview requests are normally facilitated by my Corporate Communications team and the arrangements recorded within our Press Bureau media management system.

In my role as the ACPO lead for professional standards matters I have had some contact with the national and specialist police media in this capacity. Professional support in this context is provided by the ACPO press office who facilitate contact and interviews and record the details.

(31) Describe what you are seeking to gain for the Staffordshire Police through your personal contacts with the media.

In my personal contact with the media I seek to gain mutually beneficial and productive strategic relationships and to secure the furtherance of the force mission, strategic and operational priorities. Please also see the related comments in 26 above.

(32) Describe in general terms and using illustrative examples what you consider the local and national media has been seeking from you in your personal dealings with them during your time as Chief Constable of the Staffordshire Police.

I think what the local media seeks from me is the opportunity to speak to the person ultimately responsible for policing in the county for an authoritative account of developments within the force. This is even more pertinent at a time of significant organisational change and budget reductions.

The example provided in 30 above about the BBC Radio Stoke phone in is one illustration. Another would be the six monthly updates I do for the local and regional media on our Communities First change programme.

Clearly the Authority and force has its own objectives in doing these – transparency, accountability, scrutiny, reassurance and maintaining public confidence – but what I think the media is seeking from me is access to the most senior decision-maker in the organisation to hold me accountable – on behalf of their readers, listeners and viewers – for significant changes which could affect the efficiency of effectiveness of policing services in the county.

(33) To what extent have you accepted hospitality from the media whilst Chief Constable?

Please see my response to 30 above.

(34) Insofar as you have accepted hospitality from the media, what was the hospitality that you accepted?

In terms of the hospitality accepted during the meetings set out in my response to 30 above, I accepted a lunch to the value of approximately £20 during my meeting with the editor of the Staffordshire Newsletter on the 16 April 2010 at the Swan Hotel in Stafford.

(35) To what extent have you provided hospitality for the media on behalf of the Staffordshire Police whilst Chief Constable?

The extent of this would be light refreshments during a formal business meeting or briefing.

(36) Insofar as you have accepted hospitality from the media, what was the hospitality that you accepted?

This would appear to be a repeat of question 34. Please see above response.

(37) What mechanisms are in place to monitor and record hospitality as between the Chief Constable and the media?

A force policy exists in respect of gifts, gratuities, hospitality and discounts. This policy is supported by detailed guidance notes. Where a benefit has been turned down or falls outside of those listed in policy as being automatically acceptable, then an electronic register exists to record the details. Please see 46-51 below.

(38) What mechanisms are in place to monitor and record meetings with the media generally?

We normally record all interactions with the media in our Press Bureau media management database. Monitoring and recording is undertaken by the Corporate Communications Department. Whenever possible, interviews are also recorded.

The formal briefings I deliver are 'on-the-record' so these are reported upon and the details published as a matter of full public record. The annual editors meeting is a more informal meeting but attendance and key action points are recorded by my Corporate Communications staff who are also in attendance.

(39) Do you ever discuss the media, or media coverage, with politicians? If so, how important is such communication and why?

Media coverage forms part of discussions with the Police Authority, which includes local councillors, if it significantly impacts upon the efficient and

effective delivery of policing services in Staffordshire. Local MPs may also be briefed by senior officers or local policing team commanders on significant media coverage which may impact upon the safety or reassurance of their constituents. On occasions, media coverage may prompt either a letter or phone call from a local politician requesting clarification or further information regarding a local issue.

(40) Have you ever known, or sensed, that a politician has put pressure on you to take a particular course of action as a result of lobbying or influence exerted on that politician by the media? If so, please explain (although you need not identify the politician at this stage if you do not wish to do so).

I have had no experience of this.

(41) Has the prominence which politicians have given to subjects ever given rise to pressure to alter policing priorities so as to allocate more priority to the subject being given prominence by politicians? If so, please explain.

I have had no experience of this.

(42) Set out your understanding of the type of contact which Staffordshire Police personnel have with the local and national media covering nature, extent, frequency and (in general terms) topics / content.

The force's media communications team, which is part of our Corporate Communications Department, recorded 4,250 enquiries from the media last calendar year. The four staff working within the team have daily contact with

local and regional journalists but much less frequent contact with national reporters.

Requests for information range from the straightforward such as what is happening in any particular road or street where there's police activity to more detailed questions about significant force change programmes or ongoing investigations.

In terms of the records created in our media information management system, over a third relate to just two subjects: road traffic collisions (16%) and serious acquisitive crime (20%). This gives you some idea of the basic enquiries we receive from the media.

Whilst we do encourage all staff to be open, honest and transparent with the media and to actively promote good police work through them, most contact is facilitated by our media communications team as the first port of call.

There are a number of other key roles where direct contact with journalists can be expected regarding local policing issues or other specific operational areas and these include:

- Force executive and senior leadership team
- Local Policing Team Commanders
- Senior Investigating officers
- Police commanders for specific incidents
- Duty inspectors in the force control room.

(43) Are contacts with the media restricted to certain staff, or are all staff able to deal with the media?

Please see the response provided in 42 above.

(44) What do you expect the Staffordshire Police to gain from such contacts with the media?

As stated before, I expect our contact to be for a specific policing purpose and any such contact should support the force's priorities, values and mission to keep our communities safe and reassured.

(45) What do the media seek from such contacts with your personnel?

Primarily the media are seeking information and/or guidance to produce a story for publication or broadcast.

Clearly the commercial media is driven by a commercial imperative which is to publish news which sells newspapers or increases revenues from advertising and/or listeners/viewers. The BBC, as the nation's public/state broadcaster, would be looking to fulfil its Charter and Agreement.

(46) What hospitality are your personnel permitted to accept from the media? Inter alia, are they entitled to accept a meal or a drink from a journalist?

Our force policy on gifts gratuities hospitality and discounts is supported by detailed guidance notes to help officers and staff, regardless of rank or grade, to understand what is expected of them by the organisation. There are some guiding principles encapsulated within the document which are designed to assist with the interpretation of what is expected and how to deal with such situations. These include:

- Do nothing to foster suspicion or conflict between you and your official duty and the private interests of yourselves or others
- Your dealings with people must at all times be honest, fair, transparent even-handed and seen to be so
- Ensure your actions in an official capacity are beyond reproach. They must not foster or give the impression to anyone with whom you deal, including your colleagues, that you have been influenced by a gift or

consideration to show favour or disfavour to any persons or organisation

- You must ensure that public funds are used in a responsible and lawful manner and that you are able to account for them properly
- Any doubts about the wisdom of accepting an offer or gift or hospitality, and it should be declined
- Appropriate records of gifts or hospitality accepted or refused should be maintained on the electronic database in accordance with this policy.

The guidance document identifies what is and is not acceptable for the following areas: money, discounts, seasonal or other unsolicited gifts, receiving and giving hospitality, alcohol, giving tips, voluntary gratuities and wills.

The media are not provided with any exception within this document and standards expected will apply in the same way to them as to any other persons or organisation.

In the context of receiving or giving hospitality there are a series of principles which guide officers and staff to use their judgement and help with decision making in this area:

- The significance which could be implied by external or internal observers and they may need to consider the appropriateness of such contacts.
- Potential threats to public trust and confidence whether on or off duty.
- Proportionality
- Is it in accordance with the standards of professional behaviour.

(47) What hospitality are your personnel permitted to afford to the media?

Please see response provided to 46 above.

(48) What mechanisms are in place to record hospitality as between the media and your personnel?

Please see response provided to 46 above.

(49) How (if at all) is hospitality between the Staffordshire Police (including yourself) and the media controlled and/or regulated?

Please see response provided to 46 above.

(50) Are the hospitality rules governing contact between Staffordshire Police personnel (including yourself) and the media different from those covering contact with other third parties? If so, what are the differences?

Please see response provided to 46 above.

(51) What policies and procedures are in place to record contact between a) yourself and the media: b) senior managers and the media: c) other personnel and the media? For the avoidance of doubt, please answer in relation to both formal and informal communications?

Please see response provided to 46 above.

(52) Are records of hospitality and other contact with the media audited and/or policed and, if so, how and by whom?

The electronic register is overseen by the Professional Standards Department and is subject of regular monitoring and review.

(53) In your opinion are the policies and procedures described above: a) working effectively; b) sufficient; and c) capable of improvement?

The policy and supporting guidance is clear and easily understood.

a) I suggest it is effective in what it sets out to achieve.

b) It is written in terms of guiding principles and checklists and whilst effective is capable of improvement (see below).

c) The policy will be subject of further scrutiny in light of the recently published HMIC Integrity Review “Without Fear or Favour” and I believe is capable of improvement.

(54) What systems, policies and procedures are in place in Staffordshire Police to ensure that all members of the force (including civilian employees) know what is and what is not appropriate contact with the media?

The Police Officer and Police Staff Codes of Conduct and the force’s Gifts and Gratuities Policy would apply to our dealings with the media. The force’s core Corporate Strategy values should also be applied to this area. In terms of specific guidance, Staffordshire Police has a ‘Dealing with the Media Guide’ on our intranet site which will be reviewed as part of the work of the ‘Without Fear or Favour’ force working group. This guide sets out guidance to officers on how to deal with the media at incidents, details the support that can be provided by the force’s Corporate Communications Department and provides general guidance on dealing with the media and an A to Z list of potential issues and situations.

The force also has a team of media communications officers and a small number of senior managers within the HQ-based Corporate Communications Department and officers and police staff are encouraged to speak to them for advice and guidance. Between them, they have around 40 years of experience of working in the area of police / media relations. The team work closely to the guiding principles set out in the ACPO ‘Communication Advisory Group’ Guidance 2010. This aims to encourage a presumption of openness, promote consistent practice and offer practical guidance, based on experience, so that decision making by forces will withstand scrutiny. They set broad principles which individual police forces can apply to decisions as appropriate to deal with local circumstances.

(55) Are you satisfied that the policies and procedures described above are sufficient and working effectively? Do you consider that they are capable of improvement?

I think they can certainly be improved and I anticipate the working group we have established (see 53) above, will move that work forward.

(56) What training is in place in the Staffordshire Police to ensure that all members of the force (including civilian employees) know what is and what is not appropriate contact with the media?

The force does not have a blanket approach to media training but selects specific roles that are likely to need training as part of their core professional development and routine daily work. This includes such examples as:

- the sergeant's development course
- the fatal collision investigators course
- the force's Leadership Development Programme (Inspector and police staff equivalent and above)

Staff are advised on the fundamentals of dealing with the media but also the wider communication channels that the force uses to communicate with the public directly such as social media and local neighbourhood newsletters.

The force has also published a 'Dealing with the Media Guide' on our intranet site which will be reviewed as part of the work of the force's 'Without Fear or Favour' Working Group.

(57) To what extent have leaks from the Staffordshire Police to the media been a problem during your tenure as Chief Constable?

This is not perceived to be a major problem within Staffordshire (please also see 15 above). However, there have been occasions when leaks of 'organisationally uncomfortable' information have occurred during our current

change programme. This does affect the whole force and we always attempt to be measured and proportionate in our response to such instances.

(58) What systems and procedures are in place to identify, respond to and detect the source of leaks?

These systems are maintained by the Anti Corruption Unit. They include a means of anonymously contacting the unit with information by using an electronic system called "Bad Apple". The system went live in October 2011. In addition to the Bad Apple facility there is a separate confidential telephone line "5001" for officers and staff to report concerns that they may have.

The force's Corporate Communications Department also undertakes a daily media monitoring service. This can help to identify stories and articles and, more importantly in this respect, the official or unofficial sources of these. It's also worthy of note that, as the first port of call for the majority of media enquiries into the force, the Corporate Communications Department is in a good position to identify potential leaks. Any concerns are raised with the Head of Professional Standards.

(59) How many investigations have been conducted into actual or suspected leaks from the Staffordshire Police to the media during the last 5 years and how many have led to the successful identification of the source of the leak? What was the outcome of the other investigations?

There have been no criminal investigations into any reported leaks of information to the media in the last 5 years within Staffordshire. However, please also see our response to (15) above.

(60) Has disciplinary action been taken against any member of staff (whether civilian or police officer) for leaking information to the media during the last 5 years? If so, please identify the number of cases and

their outcome. There is no need to identify the person or persons the subject of the disciplinary process

Please see the response to 59 above.

(61) What payments (if any) are considered to be legitimate financial transactions between Staffordshire Police personnel and the media?

Following on from my response to 5 above, I think there needs to be a clear distinction between legitimate, 'paid-for' marketing communications activity and inappropriate payments to officers and staff for information disclosure. The latter is completely unacceptable, it is illegal and represents a clear breach of both the police officer and police staff code of conduct.

Paying for advertising space in newspapers, on radio or on social media is acceptable when it supports a legitimate policing purpose. For example only this week (week commencing 23 January 2012) the force used advertising on Facebook to provide swift and targeted information in its efforts to locate escaped prisoner John Anslow. At the time of writing, a total of £1,200 had been spent to reach over two million people in the UK which 27,500 'clicks' to further information on our appeal. Such transactions support operational policing today and are governed by the financial regulations and policies of individual forces.

(62) What policies and/or guidance are in place in relation to financial transactions between Staffordshire Police personnel and the media?

Please refer to my response at 46 above. Such transactions will be covered by existing policies and procedures including those on gifts and gratuities, secondary employment and procurement, however we are currently reviewing this through the working group detailed before. This area is also governed by the Police Authority Standing Orders and Staffordshire Police Financial

Regulations Policy. Any transactions must comply with these provisions and fall under the management and control framework which they create.

(63) To what extent do you believe bribery of personnel by the media to be a current problem for Staffordshire Police?

There have been no reported cases of bribery and it is not regarded as a problem within Staffordshire Police. The issue is not one that features on the Strategic Assessment for Professional Standards. The Bribery Act could be linked to the vulnerability of staff within the organisation and the force is carrying out some work in this area. We are investing in an early intervention software system to accumulate and assess all available information and identify at risk personnel. This system will cross reference databases and collate all available information for a more accurate view of staffing profiles and risk issues. Work is also ongoing in respect of developing in conjunction with the PMAS financial profiling. This will identify persons inside the organisation particularly vulnerable to financial pressures and seeks to provide a trigger to early intervention and support.

(64) What steps are taken a) to educate your personnel about bribery; b) otherwise to prevent the bribery of your personnel; c) pro-actively to detect bribery; d) retrospectively to investigate bribery; and e) to discipline personnel (if any) who are found to have accepted bribes from the media?

Details of the Bribery Act are circulated in the same way as any other items of relevant new legislation. They can be accessed through the force intranet system and the National Legal Database.

(65) Does the Staffordshire Police have a press office? What role does it fulfil? If you do have such an office, what is the media's attitude towards the press office? In particular are they satisfied by the provision of information and the routing of communications through your press

office or do they prefer direct contact with individual personnel within the Staffordshire Police?

Staffordshire Police's Corporate Communications Department is made up of 18 full-time equivalent staff. Its fundamental role is to support operational policing and help deliver the force's corporate mission of keeping communities safe and reassured.

The force's communication activities are much wider than just the media. We have a small number of web officers who help maintain the force website. This has between 25,000 and 30,000 unique visitors every month. We communicate directly with 45,000 social media followers across a number of Twitter and Facebook accounts. Another significant part of the department's work is direct community communication through localised neighbourhood newsletters. These adopt a 'you said, we did' approach to demonstrate what local officers are doing, often with partners, to tackle local concerns. We also have staff working on internal communication – critical at a time of change when we require openness, transparency and staff engagement.

Four members of the media communications team perform the traditional 'press office' function, dealing with day-to-day media enquiries and providing advice and guidance to staff on media issues. Roles in this team require journalistic or public relations skills and experience and two of the staff members are former journalists. I think the media's attitude towards the team is generally positive and constructive with good working relationships across the county. There are undoubtedly times when organisational priorities and values differ and at these times we have healthy debates but on the whole I think the media are satisfied with our responsiveness and openness. Ideally, I think the media would prefer contact with individual personnel but we feel that the media communications team provides the force with a hub of experts who can make our response more efficient and effective.

(66) What limitations, if any, are there on staff from Staffordshire Police leaving to work for the media and vice versa?

There are no restraints on staff leaving the force to work for the media and I am not aware of any instances during my tenure of staff leaving the force to work for the media.

(67) Are records kept of those who join Staffordshire Police from the media, or go on to work for the media after leaving Staffordshire Police? If so, please describe the systems in place.

Records of previous employment are held with our HR Department and exit interviews are normally conducted for staff leaving the force.

(68) To the best of your knowledge are there any discernable patterns in the movement of personnel from the media into the Staffordshire Police and vice versa?

We have two staff working in our media communications team who previously worked for the same, major local newspaper. Apart from that, there are no other discernable patterns.

(69) What levels of awareness and experience are there in the Staffordshire Police of “media crimes” and in particular; a) unlawful interception of communications (including the Regulation of Investigatory Powers Act); b) bribery of officials by the media; c) blackmail; d) harassment by paparazzi and journalists; e) traffic and/or public order offences committed by photographers and journalists pursuing stories; f) inciting officials to communicate confidential information held by Staffordshire Police / conspiring with them to obtain such information; and g) crime within the media organisations other than the foregoing (e.g dishonest expense claims).

Our briefing and tasking processes are coordinated throughout the force. They take place within each operational department and local policing team. A strategic level Daily Management Meeting takes place across the force which is supported by force crime intelligence. This deals directly with daily tasking

of resources, risk management and the prioritisation of investigations. This system also manages and identifies emerging crime patterns and trends. This process deals on a daily basis with issues such as high risk missing persons, domestic burglaries and robberies. Emerging critical incidents are identified and resources allocated accordingly. I am confident that when 'media crimes' occur they would be captured within current processes. Such offences would be escalated and an appropriate response coordinated in a proportionate and timely manner. These types of crimes I suggest would be dealt with as part of our day to day business but are extremely rare in Staffordshire. Awareness of these issues is I feel sufficient and we have the capabilities and experience to deal with them.

(70) What sort of priority is given to, and what level of resources are available to deal with, the above?

The level of resources used to conduct any investigation is determined by the force tasking system and is directly related to the assessment of threat harm and risk. It is noted however that the document published by the Serious Organised Crime Agency, "The Threat to UK Law Enforcement from Corruption", does list as a potential category of corruption "Journalists and Commercial Interests". Any intelligence or evidence that highlights "media crimes" as being a significant factor would escalate our response to the issue in a proportionate way.

(71) What is your current impression of the culture within Staffordshire Police in relation to its dealings with the press?

Please see the response set out in 29 above.

ENDS