

<p>1 2 (2.00 pm) 3 LORD JUSTICE LEVESON: Yes, Mr Jay. 4 MR JAY: The next witness, please, is Ms Norgrove. 5 MS JULIE ALISON NORGROVE (affirmed) 6 Questions by MR JAY 7 MR JAY: Your full name, please? 8 <b>A. Julie Alison Norgrove.</b> 9 Q. Thank you. Can I ask you please to turn up a copy of 10 your witness statement, dated 29 February. It's signed 11 by you under a standard statement of truth. Is this 12 your formal evidence to the Inquiry? 13 <b>A. Yes, it is.</b> 14 Q. You are currently the director of audit risk and 15 assurance, providing the internal audit service for the 16 MOPC, and before that, at least from 1 October 2009, you 17 were the equivalent director of the MPA; is that 18 correct? 19 <b>A. It is. I should also say that I am now the head of</b> 20 <b>audit for the Metropolitan Police Commission as well.</b> 21 Q. Thank you. You took over, I believe, from Mr Tickner, 22 who we've heard some reference to in this Inquiry; is 23 that right? 24 <b>A. I did.</b> 25 Q. In terms of the law, this is somewhat complicated but</p> <p style="text-align: center;">Page 1</p>	<p>1 paragraph 12 -- is an assurance function that provides 2 an independent and objective opinion to an organisation 3 on the control environment by evaluating its 4 effectiveness in achieving the organisation's 5 objectives. So this is really a corporate governance 6 and standards issue, is that in epigrammatic terms more 7 or less what you do? 8 <b>A. Yes, it's giving opinion really on how well the</b> 9 <b>organisation manages its risks to achieve its objectives</b> 10 <b>and to ensure that in doing so they use their resources</b> 11 <b>efficiently and effectively.</b> 12 Q. Presumably there are nation-wide standards by which 13 risks and management are assessed? 14 <b>A. Yes.</b> 15 Q. You say in paragraph 16 that the work of the relevant 16 directorates was "overseen and supported by the MPA's 17 Corporate Governance Committee". So is this an extra 18 layer of supervision? 19 <b>A. It's recognised best practice that you should have an</b> 20 <b>audit committee in place, which is essentially what the</b> 21 <b>Corporate Governance Committee is. Just to give that</b> 22 <b>additional assurance around the risk and control</b> 23 <b>environment and myself and the external auditor would</b> 24 <b>actually report to it on a regular basis.</b> 25 LORD JUSTICE LEVESON: So do I understand this: the control</p> <p style="text-align: center;">Page 3</p>
<p>1 it's clearly set out in your statement that following 2 new legislation, both the MPS and the MOPC have audited 3 body status and therefore fall under the Audit 4 Commission Act. 5 The consequence of that, or the role of internal 6 audit, you explain in paragraphs 10 and following of 7 your statement, I believe. Could you briefly summarise 8 it for us, please, Ms Norgrove? This is our page 13101. 9 <b>A. I think I have a slightly different numbering to -- the</b> 10 <b>actual difference in the statutory approach now under</b> 11 <b>the MOPC, in essence, the change meant that previously</b> 12 <b>the Metropolitan Police was not an auditory body, it was</b> 13 <b>the MPA itself, and that's why the audit service sat</b> 14 <b>within that functionality. With the introduction of the</b> 15 <b>Act, that has now changed and the Met is an auditory</b> 16 <b>body, as is the MOPC, and therefore both are required to</b> 17 <b>have an effective audit service.</b> 18 Q. Could you define, please, the relevant audit service for 19 the MOPC on the one hand and the MPS on the other? 20 <b>A. Both will receive an effective audit service to meet the</b> 21 <b>professional standards that I am bound to adhere to.</b> 22 Q. So it's your directorate which is responsible for the 23 audit responsibility in relation to both entities? 24 <b>A. Yes, it is.</b> 25 Q. Internal audit, as you explain -- this now is</p> <p style="text-align: center;">Page 2</p>	<p>1 of the organisation is within the hands of the 2 organisation, that's the Commissioner for the Met and 3 presumably the Deputy Mayor for the MOPC. They're 4 responsible for control. You then create structures 5 whereby you can assure yourself that appropriate checks 6 and balances are in place in relation to use of money 7 and other aspects of corporate governance, and then the 8 Mayor's Corporate Governance Committee checks that 9 actually the way in which you've approached your job 10 fits their understanding of your remit? Is that fair? 11 <b>A. Yes. It would be for me as the head of audit to</b> 12 <b>determine the strategic approach so that I could give</b> 13 <b>the Commissioner and the MOPC assurance around how well</b> 14 <b>they're managing their risks, and I would then report</b> 15 <b>that in to what is now actually the audit panel under</b> 16 <b>the new arrangements and they would give assurance to</b> 17 <b>the Commissioner and to the MOPC.</b> 18 LORD JUSTICE LEVESON: But does your audit panel -- that's 19 in the Mayor's office, is it? 20 <b>A. It's within -- it's actually a joint audit panel because</b> 21 <b>that was what was recommended.</b> 22 LORD JUSTICE LEVESON: That's actually the question I was 23 trying to get to. 24 <b>A. I'm sorry.</b> 25 LORD JUSTICE LEVESON: Who sits on that panel, if it's part</p> <p style="text-align: center;">Page 4</p>

<p>1 Met and part Mayor's office?</p> <p>2 <b>A. The audit panel itself is independent. It's not made up</b></p> <p>3 <b>of representatives from the Met or from the MOPC. In</b></p> <p>4 <b>fact, the guidance would advise against that, so it is</b></p> <p>5 <b>truly an independent joint audit panel.</b></p> <p>6 LORD JUSTICE LEVESON: Appointed jointly then?</p> <p>7 <b>A. Yes.</b></p> <p>8 LORD JUSTICE LEVESON: All right.</p> <p>9 MR JAY: You explain in paragraph 19 that when you arrived,</p> <p>10 you sought to adopt a greater focus on a risk-based</p> <p>11 approach to your work, and you identify five key</p> <p>12 strategic approaches or objectives, and those are listed</p> <p>13 in paragraph 19. Does that summarise the position?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. And one of them was conducting risk-based audits. When</p> <p>16 we look at what you did in relation to the MPS's gifts</p> <p>17 and hospitality arrangements and policies, does that</p> <p>18 come within the first of these bullet points, namely</p> <p>19 risk-based audit, or does it overlap some other of these</p> <p>20 points?</p> <p>21 <b>A. No, that would be a risk-based audit.</b></p> <p>22 Q. Review of risk management, does it fall within that at</p> <p>23 all or not?</p> <p>24 <b>A. It would inform your opinion on risk management, but the</b></p> <p>25 <b>risk management review that's referred to there is</b></p> <p style="text-align: center;">Page 5</p>	<p>1 <b>its objectives.</b></p> <p>2 Q. And would matters such as reputational risk and the</p> <p>3 perception of harm be accommodated within that concept</p> <p>4 or not?</p> <p>5 <b>A. When we're actually determining what we need to do in</b></p> <p>6 <b>looking at the annual programme, we will look at the --</b></p> <p>7 <b>one of the areas would be sensitivity and in that we do</b></p> <p>8 <b>need reputational risk.</b></p> <p>9 Q. In seeing where we are on the scale, this is the</p> <p>10 application of the national standard which I think you</p> <p>11 referred to earlier, is it? So you apply such</p> <p>12 a standard and you see how many points you score, and if</p> <p>13 you score a certain number of points, you're either low,</p> <p>14 medium or high, is it as simple as that?</p> <p>15 <b>A. That's not necessarily a national standard, but that</b></p> <p>16 <b>would be recognised best practice.</b></p> <p>17 Q. Thank you. Gifts and hospitality in particular, where</p> <p>18 your evidence starts at paragraph 29 on this issue,</p> <p>19 page 13105. You make the point there:</p> <p>20 "There is no separate policy or arrangements</p> <p>21 governing hospitality between the MPS and the media ..."</p> <p>22 Is that simply an observation or are you suggesting</p> <p>23 that that may be a problem or an issue which could be</p> <p>24 addressed?</p> <p>25 <b>A. No, that's just a statement of fact.</b></p> <p style="text-align: center;">Page 7</p>
<p>1 <b>looking at the corporate risk process, specifically.</b></p> <p>2 Q. As part of your functions, as you say in paragraph 20,</p> <p>3 you draw up an annual audit plan, which presumably</p> <p>4 covers everything within the corporate governance of</p> <p>5 both the MPA and the MPS, does it?</p> <p>6 <b>A. The -- yes. And now the MOPC and the MPS.</b></p> <p>7 Q. Yes. Paragraph 22 now, page 13104, you say:</p> <p>8 "Over the past eleven years, internal audit has</p> <p>9 compiled a database of approximately 200 systems (gifts</p> <p>10 and hospitality being one of them) that need to be</p> <p>11 audited."</p> <p>12 So this is but a small part of a much wider activity</p> <p>13 you're conducting, isn't it?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. Can you explain, please, paragraph 23:</p> <p>16 "The MPS gifts and hospitality system was</p> <p>17 consistently categorised as medium risk by internal</p> <p>18 audit. It's been subject to audit review five times in</p> <p>19 the past 11 years."</p> <p>20 So presumably there's low, medium and high risk, so</p> <p>21 we're falling in the middle, and when we're looking at</p> <p>22 risk, is this risk to the organisation, risk to the</p> <p>23 public or risk to something else or a combination of all</p> <p>24 of them?</p> <p>25 <b>A. It is generally risk to the organisation in achieving</b></p> <p style="text-align: center;">Page 6</p>	<p>1 Q. Carrying out the reviews, because you've told us there</p> <p>2 were five reviews over the course of the relevant</p> <p>3 period -- this is paragraph 30 -- you:</p> <p>4 "... review the governance arrangements for dealing</p> <p>5 with offers of gifts and hospitality on the basis of the</p> <p>6 risk approach. The audit reviews involved evaluating</p> <p>7 the adequacy and effectiveness of the MPS internal</p> <p>8 control framework in place in dealing with offers of</p> <p>9 gifts and hospitality."</p> <p>10 So you're looking at this really in terms of the</p> <p>11 system and the structures rather than --</p> <p>12 <b>A. Yes.</b></p> <p>13 Q. -- individual cases?</p> <p>14 <b>A. Yes.</b></p> <p>15 Q. We're going to summarise some of this and look at other</p> <p>16 parts in more detail. The first review was in 2001, and</p> <p>17 the report was promulgated on 2 January 2002. You</p> <p>18 provide the copy which is at tab 78. We're not going to</p> <p>19 look at it. Your summary faithfully sets out the</p> <p>20 findings of that review. But 14 recommendations were</p> <p>21 made, 13 of which were accepted by the MPS, and you know</p> <p>22 the one which was not accepted was one which the HMIC</p> <p>23 has recommended in its report recently?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. There's a certain irony there. What happened next was</p> <p style="text-align: center;">Page 8</p>

<p>1 that the MPS, having accepted your recommendations, then                  2 go about implementing them, and the MPA audit panel                  3 monitors that implementation, is that what happened                  4 next?                  5 <b>A. Yes. In particular, those that were considered to be                  6 high risk.</b>                  7 Q. As you say in paragraph 32, the chair of the audit panel                  8 wrote to then Assistant Commissioner Mr Hogan-Howe,                  9 pointing out that three high risk recommendations had                  10 not in fact been implemented. We can see these,                  11 I think, from tab 79. Page 13203. They fell, some of                  12 them did at least, within the issue of gifts and                  13 hospitality.                  14 <b>A. Yes.</b>                  15 Q. I think all three recommendations related to that. The                  16 upshot was that Mr Hogan-Howe was invited to attend                  17 a meeting to give an explanation, and that meeting was                  18 on 27 March 2003, and Mr Hogan-Howe apologised for the                  19 fact that the recommendations had not been implemented?                  20 <b>A. Yes.</b>                  21 Q. We're now on paragraph 33. The follow-up audit of the                  22 first review, which is the 2002 review, was conducted in                  23 May 2003. It's tab 81. Again we're not going to look                  24 at it. 12 of the 14 recommendations that had been made                  25 had been implemented, and as we know, 13 had been</p> <p style="text-align: center;">Page 9</p>	<p>1 the Chief Executive of the MPA was to review the                  2 Commissioner's and Deputy Commissioner's gifts and                  3 hospitality register every six months?                  4 <b>A. Yes.</b>                  5 LORD JUSTICE LEVESON: I think there were 16 recommendations                  6 actually.                  7 MR JAY: I lost one.                  8 LORD JUSTICE LEVESON: I'm merely looking at 13221:                  9 "The management have accepted all 16                  10 recommendations."                  11 <b>A. It was actually I think 15 for the MPS and one for the                  12 MPA, so that was the distinction.</b>                  13 LORD JUSTICE LEVESON: There you are, all right.                  14 MR JAY: Okay. So there again, because this was medium                  15 risk, because all the recommendations seemed to be                  16 addressed, there would understandably be a further                  17 period of time when nothing would necessarily happen,                  18 and you say in paragraph 36 that in 2008 and 2009, this                  19 was independently of this review process, the                  20 directorate commented on the MPS's proposed revised                  21 policy and procedure in relation to gifts and                  22 hospitality.                  23 Can you tell us the context of that? Why were you                  24 invited to or did you decide to comment on the revised                  25 policy?</p> <p style="text-align: center;">Page 11</p>
<p>1 accepted. The recommendation that was not implemented                  2 by the MPS was one which related to including the gifts                  3 and hospitality obligations in a personal guide issued                  4 to all officers and staff, but then you were informed                  5 that that would happen by the end of the summer of 2003,                  6 so so far so good.                  7 <b>A. Yes.</b>                  8 Q. Then I think there is a hiatus until 2006/2007, when                  9 a further audit was conducted. Is it usual that there                  10 would be this sort of three-year gap in time as we see                  11 here? It may be because the recommendations had all                  12 been implemented, well, then there's a period of quiet                  13 before you look into it again? Have I correctly                  14 understood it?                  15 <b>A. The principle would be, as this was a medium risk                  16 system, that we would look to review it twice in                  17 a five-year period.</b>                  18 Q. Thank you. You carried out a further audit, and the                  19 report is at JN8, which is tab 82. Again to summarise                  20 it, the overall opinion was that the control framework                  21 itself was adequate, but there were a number of controls                  22 that were not operating effectively and improvements in                  23 implementing the framework were acquired.                  24 In the end, I think there were 15 recommendations                  25 and the MPS agreed all of them, and one of them was that</p> <p style="text-align: center;">Page 10</p>	<p>1 <b>A. It would have been actually that we would have been                  2 invited to. As a consequence of a number of the                  3 recommendations that were made in the previous report,                  4 they did actually relate to making improvements to the                  5 policy and I think the director at the time just wanted                  6 us to have a look at that policy before they published                  7 it.</b>                  8 Q. You refer to an email, which is at tab 83, page 13238.                  9 Can I just understand this, that the reference to the                  10 target date for the implementation of the                  11 recommendations being 31 December 2007, was that                  12 referable to the 15 recommendations we were looking at                  13 as part of the 2006/2007 review?                  14 <b>A. Yes.</b>                  15 Q. So there was concern, well, there's been some delay                  16 here?                  17 <b>A. Yes.</b>                  18 Q. Thank you. In paragraph 37:                  19 "In March 2009 a report was submitted to the                  20 CGC ..."                  21 Remind me what that's an acronym for.                  22 <b>A. That's the Corporate Governance Committee that performs                  23 the audit panel function. We changed its name in 2004.</b>                  24 Q. Oh right.                  25 "... by the MPS director of human resources in</p> <p style="text-align: center;">Page 12</p>

<p>1 relation to amendments to be made to the operating 2 procedure. The report stated that the MPS's review of 3 their gifts and hospitality policy was prompted by two 4 things."</p> <p>5 One of them is a statutory requirement and secondly 6 the policy needed to be "more explicit in its 7 application and should incorporate the giving as well as 8 the receiving of corporate hospitality". The policy had 9 not been reviewed since 2003 and 2004.</p> <p>10 So the concern or issue here was that there had been 11 some period of time, five or six years, between the 12 policy and the review of that policy?</p> <p>13 <b>A. Yes, I think the Met decided it was time that they 14 needed to review the policy.</b></p> <p>15 Q. Was that something that you, pursuant to your auditing 16 role, would have some influence over, in other words 17 apparent delay in reviewing policy, or was this 18 something for the Met to deal with it?</p> <p>19 <b>A. In fact I think the review that we conducted earlier did 20 actually say that the policy hadn't been reviewed for 21 some time.</b></p> <p>22 Q. As you say in paragraph 38, the revisions took effect in 23 January 2009, and these included the introduction of 24 hardback or electronic gifts and hospitality registers 25 and review of entries in the registers, and indeed it's</p> <p style="text-align: center;">Page 13</p>	<p>1 LORD JUSTICE LEVESON: Would it be fair to say -- these are 2 all obviously very important features, but this was not 3 high on the risk analysis that you would do, was it?</p> <p>4 <b>A. No.</b></p> <p>5 LORD JUSTICE LEVESON: I mean I notice, just looking at the 6 minutes of the meeting which make this point about gifts 7 and hospitality, the next item on the agenda was the use 8 of business credit cards. One would have thought that 9 was a rather higher problem in orders of magnitude.</p> <p>10 <b>A. Yes, it certainly was at the time, yes.</b></p> <p>11 LORD JUSTICE LEVESON: So one has to put the context around 12 how you're talking about all these areas.</p> <p>13 <b>A. Yes.</b></p> <p>14 MR JAY: I think what happened is that, as you say in 15 paragraph 41, it was agreed the CGC would acknowledge 16 the progress made, but it couldn't endorse the report. 17 A further report was requested, and that was produced on 18 14 September 2009, which we can see as tab 86. I don't 19 think there are any specific points which arise on it, 20 but you say that it gave an update on the changes that 21 had been made to the gifts and hospitality procedure 22 following the comment by the members: 23 "The report notes no changes had been made to the 24 policy, but the guidance documents annexed to the policy 25 had been amended to take on board the members of the</p> <p style="text-align: center;">Page 15</p>
<p>1 true from what the Inquiry has seen that there was 2 a shift over to an electronic system at about that time.</p> <p>3 Can I move forward to paragraph 40, the minutes of 4 the CGC meeting on 23 March 2009, at which the report 5 was considered. This is the report you refer to in 6 paragraph 8. It showed that members noted a number of 7 things which apparently gave rise to concern. Protocols 8 around alcohol were vague. Can you recall what the 9 issue was there?</p> <p>10 <b>A. I can't recall the exact issue. I think it may have 11 been that there was a reference in the giving of 12 corporate hospitality that alcohol may be provided, but 13 there wasn't anything more detailed than that.</b></p> <p>14 Q. The report itself doesn't really help us on this?</p> <p>15 <b>A. No.</b></p> <p>16 Q. This is page 13266. There were a series of concerns 17 which are recorded as seven bullet points. Then you 18 record this: 19 "Other members felt the SOP should not be too 20 prescriptive and should provide the capacity to exercise 21 discretion." 22 That presumably reflects a difference of view within 23 the relevant committee, doesn't it?</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. The upshot in paragraph --</p> <p style="text-align: center;">Page 14</p>	<p>1 CGC's comments."</p> <p>2 So broadly speaking the CGC's views had been 3 infiltrated into the report, hadn't they?</p> <p>4 <b>A. Yes, into the procedures.</b></p> <p>5 Q. Into the procedures. Another report was presented to 6 the CGC setting out the position with regard to the 7 reporting of MPA members and officers of gifts. I don't 8 think similar issues arise here. We have focused for 9 the time being on the MPS, but had there been the same 10 sort of debate and concern over what the MPA itself was 11 doing regarding gifts and hospitality?</p> <p>12 <b>A. No. I think members felt that that was in the public 13 domain.</b></p> <p>14 Q. Fair enough. In paragraph 45, you carried out a further 15 audit, which began in August 2011, but that was pursuant 16 to a plan which you'd approved in March 2011, so the 17 reason for the further audit was not the events of July 18 2011?</p> <p>19 <b>A. No, it was already in the approved plan.</b></p> <p>20 LORD JUSTICE LEVESON: But it's just as well, I suppose, 21 because if it hadn't been in the approved plan, it very 22 quickly would have come into it, wouldn't it?</p> <p>23 <b>A. I may well have been asked to do that, sir, yes.</b></p> <p>24 LORD JUSTICE LEVESON: Yes.</p> <p>25 MR JAY: You carried out the review and the report is at</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

<p>1 JN16. We need to see it. It's under tab 90, 13319.  2 Maybe we should look at the executive summary. 13321.  3 1.4:  4 "We reviewed the effectiveness of the management of  5 the following key risks to achieve the policy intent  6 governing gifts and hospitality."  7 Then there are a series of concerns:  8 "Gifts and hospitality policy does not reflect  9 appropriate professional and ethical standards and/or  10 does not meet legislative requirements.  11 "Ill defined policy for dealing with offers of gifts  12 or hospitality.  13 "Procedures are not aligned to the approved policy  14 and/or are unclear.  15 "Staff and management are not made aware of the  16 policy and procedures or subsequent changes.  17 "Unauthorised acceptance of gifts and/or  18 hospitality, lack of transparency, potential conflicts  19 of interest, non-compliance, inaccurate supervision and  20 review."  21 So there are a whole host of problems here and in  22 paragraph 47 some key risk issues for management action  23 were included, and we can see those in the report  24 itself.  25 Were these problems which had arisen recently, do</p> <p style="text-align: center;">Page 17</p>	<p>1 at the relevant register and you could see that that  2 failing was demonstrated?  3 <b>A. Yes.</b>  4 Q. Is that correct?  5 <b>A. Mm-hm.</b>  6 Q. Having done so, it then becomes a risk, does it, under  7 sort of the parlance of auditing?  8 <b>A. We would say it was a risk that wasn't being managed as  9 effectively as we would want it to be.</b>  10 LORD JUSTICE LEVESON: You're not saying that it was  11 inappropriate to accept the hospitality, but if you have  12 a scheme that identifies a mechanism so that risks are  13 minimised and the scheme isn't being operated  14 efficiently or effectively, then it rather defeats the  15 point of the whole exercise?  16 <b>A. Yes. That recommendation was from a previous audit that  17 we felt needed to be implemented, the justification  18 needs to be clear, and we were following up and giving  19 a review as to whether that had taken place.</b>  20 LORD JUSTICE LEVESON: I suppose that in part this has an  21 impact in two ways. It's not merely so that there can  22 be a check. It's also so that the person affected is  23 aware of the need -- is reminded of the need to justify  24 the decision which he or she takes at the time he's  25 taking the decision, because if you have to go through</p> <p style="text-align: center;">Page 19</p>
<p>1 you think, or put another way, why weren't they  2 addressed in previous reports?  3 <b>A. I think if I could just put that in context, these  4 aren't problems as such, they are generic risks that you  5 would associate with a gifts and hospitality process,  6 and we're seeking to give assurances as to whether  7 they're operating effectively or not.</b>  8 Q. One is putting entirely the wrong emphasis to describe  9 it as a problem. It is, as you rightly say in the  10 report, a key risk.  11 <b>A. Yes.</b>  12 Q. Just see how this is addressed in the report, though.  13 Section 4, page 13322. Aren't you saying there -- I may  14 have misunderstood it -- that these are the failings  15 which your auditing undertaking, as it were, has  16 identified?  17 <b>A. What we're saying is these are the actual key risks that  18 senior management need to concern them with, yes, and to  19 address.</b>  20 Q. For example, 4.3, page 13323:  21 "Police officers and members of staff, including  22 Management Board, do not always provide a proper  23 justification as to why hospitality or a gift has been  24 accepted, although this is required under the policy."  25 So presumably to reach that conclusion, you looked</p> <p style="text-align: center;">Page 18</p>	<p>1 the process, then you have to go through the  2 intellectual process of deciding: is this sensible?  3 <b>A. Yes, absolutely.</b>  4 MR JAY: I've been asked by another core participant to put  5 to you this question, that the issues or the risks which  6 you were identifying in 2011 were issues which were  7 themes throughout the auditing process which started in  8 2001, the first report is January 2002. Does this not  9 show a lack of will at the top of the MPS both to bring  10 into place proper policies but also to implement them?  11 <b>A. I think if you look back from -- back to 2011 and now,  12 what you see is that there is a pattern, that the  13 process itself has been improved, and in fact a couple  14 of the follow-up reviews did show that the  15 recommendations had been implemented and that there had  16 been some improvement, but then with time we do slip  17 back to that improvement not continuing, so it's not  18 been sustainable throughout the period.</b>  19 LORD JUSTICE LEVESON: Another feature, of course, is that  20 there are different personnel in place who aren't quite  21 as familiar with the rationale or they haven't gone  22 through the same thought processes as to the reasons why  23 the policy has been tightened in the first place.  24 <b>A. Yes, that is an issue as well.</b>  25 MR JAY: Following this report, or perhaps as part of it,</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 there was an action plan. 16 actions were agreed with 2 the MPS to improve the governance of dealing with gifts 3 and hospitality and their attendant risks. Six of those 4 16 actions were assessed to be high risks; is that 5 right?</p> <p>6 <b>A. Yes.</b></p> <p>7 Q. So part of the response was a revised gifts and 8 hospitality policy, which was presented to the committee 9 in December. We have that under tab 91, I think, of 10 your bundle, dated 12 December 2011, and the narrative 11 part of it starts at 13343. I think the committee were 12 satisfied with this policy in terms of its substance and 13 its clarity, weren't they?</p> <p>14 <b>A. Yes, I think it's true to say they thought it was more 15 explicit than the previous policy.</b></p> <p>16 Q. Thank you. Oh yes, there's one issue which you have 17 noted as a continuing cause for concern, maybe, or at 18 least you feel there's a lack of clarity. This is the 19 sentence in the policy which I actually referred to 20 previously this morning: 21 "The only exception to this is where it can clearly 22 be justified that to refuse would cause serious offence 23 or damage working relations."</p> <p>24 <b>A. Yes.</b></p> <p>25 Q. What is the, as it were, problem with that sentence, if</p> <p style="text-align: center;">Page 21</p>	<p>1 follows on the areas contained in the overview section." 2 There are perhaps three points you make. 3 Paragraph 57: 4 "I would agree with many of the points made; and our 5 recent review of the MPS control framework ... 6 demonstrates that whilst there were policies and 7 procedures in place, there was a lack of consistency in 8 their interpretation and application. I also agree 9 there is a need for greater analysis of gifts and 10 hospitality records. I suspect a key issue here is that 11 records are not maintained in sufficient detail or in 12 such a way that records can be readily analysed." 13 So did you detect a trend that basically not enough 14 information was provided, or sometimes information was 15 provided formulaically -- we saw that in this Inquiry in 16 some of the records -- such that it couldn't sensibly be 17 analysed?</p> <p>18 <b>A. Yes. I mean the difficulty would have been in the past 19 that a lot of that information was actually in 20 individual books stored in various locations across the 21 MPS and having the ability to analyse that would be 22 actually quite difficult.</b></p> <p>23 LORD JUSTICE LEVESON: Yes, you're writing it down for the 24 sake of writing it down without allowing it to be used 25 for any purpose.</p> <p style="text-align: center;">Page 23</p>
<p>1 any?</p> <p>2 <b>A. I think the main issue that we're still seeking further 3 clarification is the circumstances when damaging working 4 relationships in particular would apply to rejecting 5 hospitality.</b></p> <p>6 Q. So you want to be provided, do you, with some concrete 7 examples so you could test the validity of the 8 proposition?</p> <p>9 <b>A. I mean that would be one thing for me, but I think more 10 importantly the officers and the staff of the Met need 11 that guidance and they need to be very clear when that 12 criteria actually applies.</b></p> <p>13 Q. Thank you. You then address the Filkin report. There 14 are three key findings which you alight on, and you make 15 the point that you warmly welcome them because they're 16 in line with your own thinking, as it were, thinking 17 underpinning some of the audit reports. Is that a fair 18 summary?</p> <p>19 <b>A. Yes. I think they reflect the findings of our recent 20 audit in particular.</b></p> <p>21 Q. Okay. I may be taking that up with a later witness 22 today. 23 The HMIC report. You said at the bottom of 24 page 13113, in your paragraph 56: 25 "From an internal audit perspective, I comment as</p> <p style="text-align: center;">Page 22</p>	<p>1 <b>A. Mm-hm.</b></p> <p>2 LORD JUSTICE LEVESON: In that regard, do you have any 3 comment upon the rather surprising discrepancies -- 4 which are now, I appreciate, explained -- between the 5 hard copy of the registers and the online versions which 6 were the subject of correspondence between the Chief 7 Executive and the Commissioner only a month ago?</p> <p>8 <b>A. Yes. I think possibly a key issue there is that back in 9 September 2011 this was the first time that the Met had 10 actually put their records online, and publicly, and 11 they were doing everything they could to ensure that 12 that record was complete.</b></p> <p>13 LORD JUSTICE LEVESON: Doubtless that's ongoing work.</p> <p>14 <b>A. Yes.</b></p> <p>15 MR JAY: We'll go back to your statement, Ms Norgrove. 16 Paragraph 58 is not relevant to this Inquiry, but 17 paragraph 59 may be. When you're dealing with the role 18 of the PCCs, who will come into being in November of 19 this year, you point out that: 20 "They exercise effective oversight, but this must 21 not be seen as a replacement for management control of 22 the system on a day-to-day basis. Strong leadership 23 from the top supported by effective supervision and 24 a clear statement of what is and what is not acceptable 25 are key."</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 So that's an important theme coming out of your 2 evidence, that the important audit function which you're 3 carrying out is in one sense supervisory or ancillary, 4 that what is central to this is strong leadership and 5 the right culture being promoted within the organisation 6 from the top of it? 7 <b>A. Yes.</b> 8 Q. Is that -- 9 <b>A. Mm-hm.</b> 10 Q. Okay. If you don't mind, we're going to pass over the 11 next few paragraphs and alight on paragraph 68 at the 12 bottom of page 13116. You're still on the HMIC report 13 here. You: 14 "... agree with the views expressed within the 15 report that effective governance plays an essential role 16 in demonstrating the highest standards of integrity. It 17 is often the lack of effective supervision and 18 management review that leads to a breakdown in controls 19 and subsequent abuse of systems. I agree that more 20 effective oversight of integrity issues would be 21 productive together with a greater focus on prevention." 22 So is that paragraph 69 borne out of your experience 23 of auditing and you're laying down here a sort of 24 a general rule which applies? 25 <b>A. Yes.</b></p> <p style="text-align: center;">Page 25</p>	<p>1 adversely affected by the inconsistent application and 2 interpretation of policy and procedures in practice by 3 some in senior positions." 4 Well, I have been asked to ask you this, perhaps the 5 obvious question, you may not want to answer it though: 6 who are you referring to there? 7 <b>A. I think our recent review did focus in particular on 8 senior officers and that did include management board as 9 well as some borough commanders, and it did show that 10 there was a difference in interpretation of the policy.</b> 11 LORD JUSTICE LEVESON: It's not that anybody is deliberately 12 ignoring it, it's that you make a series of 13 recommendations which, whether for lack of understanding 14 or otherwise, are 60 per cent implemented but not 15 entirely implemented. Some people are more enthusiastic 16 than others, so there isn't a consistent approach, and 17 that itself changes over time and needs constantly 18 moving along the road. Is that what you're trying to 19 portray? 20 <b>A. Yes, it is.</b> 21 LORD JUSTICE LEVESON: But you're not suggesting that 22 anybody has deliberately said, "Well, I'm not going to 23 do this"? 24 <b>A. No, I think there has been and I think our report 25 evidences a difference in interpretation of the policy.</b></p> <p style="text-align: center;">Page 27</p>
<p>1 Q. Then you deal with focus on training issues, which 2 I think are probably self-explanatory, and the 3 importance of that will be readily understood. When you 4 address the principal HMIC recommendations at 5 paragraph 74 and following, I think it's right to say 6 that you endorse all of the key recommendations insofar 7 as they concern module two of this Inquiry, don't you? 8 <b>A. Yes, I do.</b> 9 Q. Can I ask you, please, about your conclusions. You do 10 say -- this is paragraph 78, page 13119 -- that: 11 "... the MPS internal control framework for dealing 12 with gifts and hospitality has improved over time." 13 Are we to get the message that recommendations are 14 made by audit, they're then implemented, there's then 15 a bit of a slip, audit comes back in, further 16 recommendations are made and the process is replicated 17 over time? Or is it your evidence, your assessment that 18 there's been a gradual improvement over time? 19 <b>A. I think there's been certainly an improvement in the 20 recording of hospitality over time, which is still 21 evident. I would say that some of the applications of 22 the key controls around that have been inconsistent over 23 the period.</b> 24 Q. You specifically identify this issue: 25 "... the effectiveness of that framework has been</p> <p style="text-align: center;">Page 26</p>	<p>1 MR JAY: Can I ask you finally, please, to clarify 2 paragraph 80 of your statement. You say: 3 "There is no need for a separate governance process 4 for dealing with hospitality between the police and the 5 media." 6 The reason being that that's covered by the existing 7 process, adequately in your view, presumably? 8 <b>A. Mm-hm.</b> 9 Q. "The key is to apply consistently effective controls 10 designed to protect the integrity of individuals and the 11 organisation in dealing with all third parties in this 12 respect." 13 So that's a general principle which you touched on 14 in paragraph 69 and clearly restated here? 15 <b>A. Yes.</b> 16 MR JAY: Thank you. Those are all the questions I had for 17 you, Ms Norgrove. 18 LORD JUSTICE LEVESON: Again, as with the other MOPC 19 witnesses, I'm very grateful to you for what has 20 obviously been a significant piece of work, but I hope 21 that reviewing the history is itself helpful as you plan 22 for the future. 23 <b>A. It is very helpful, and of course we are also helping 24 HMIC and the Met itself implement some of the issues 25 that may well be arising out of this Inquiry.</b></p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 LORD JUSTICE LEVESON: Thank you. Is there anything else 2 that you would like to suggest that I ought to be 3 thinking about in any of the areas in respect of which 4 you provide audit or equivalent functions? 5 <b>A. No, I think they're covered within my statement, thank 6 you.</b> 7 LORD JUSTICE LEVESON: Thank you very much indeed. Thank 8 you. 9 <b>A. Thank you.</b> 10 MR BARR: Sir, the next witness is Mr Priestley. 11 LORD JUSTICE LEVESON: Thank you. 12 MR BEN WARNER PRIESTLEY (affirmed) 13 Questions by MR BARR 14 MR BARR: Could you confirm your full name, please? 15 <b>A. It's Ben Warner Priestley.</b> 16 Q. You've provided a witness statement to the Inquiry. 17 I understand that there is a correction that needs to be 18 made to the figure at paragraph 4, that you want to 19 change that from 40,000 to 42,000; is that right? 20 <b>A. Yes, please.</b> 21 Q. Subject to that correction, are the contents of your 22 witness statement true and correct to the best of your 23 knowledge and belief? 24 <b>A. They are.</b> 25 Q. You work for the trade union UNISON, and you tell us in Page 29</p>	<p>1 officers? 2 <b>A. That's a figure that's changed quite remarkably in the 3 last 10 or 15 years through a process called workforce 4 modernisation or, in other quarters, civilianisation, 5 where the roles previously undertaken by police officers 6 are now very often undertaken by police staff, 999 call 7 takers, forensic officers, investigators, custody and 8 detention officers. About 40 per cent of the police 9 workforce is now police staff rather than police 10 officers. In some forces actually there is a majority 11 of police staff, but they're very, very small in number.</b> 12 Q. Just to be clear of the distinction, you represent 13 police staff. Police officers, if they want 14 representation, must join their own staff associations 15 a opposed to a trade union? 16 <b>A. Yes. I think the important distinction is that we 17 represent those individuals who are employed under 18 a contract of employment with the Police Authority, that 19 is until the election of police and crime commissioners, 20 whereas a police officer is sworn into the office of 21 constable and not technically an employee.</b> 22 LORD JUSTICE LEVESON: They're members of the federation up 23 to the rank of superintendent? 24 <b>A. Correct.</b> 25 LORD JUSTICE LEVESON: And superintendents have another Page 31</p>
<p>1 your witness statement that UNISON has 1.2 million 2 members in the health, local government, education, 3 police, justice and utility sectors, but your role is as 4 UNISON's national officer with responsibility for 5 members in the police probation services and CAFCASS; is 6 that right? 7 <b>A. That is correct.</b> 8 Q. You've worked for UNISON and its predecessor unions 9 since 1990; is that right? 10 <b>A. Yes.</b> 11 Q. Have you personally got any experience of working 12 yourself for the police? 13 <b>A. No, I've never worked for the Police Service.</b> 14 Q. Paragraph 2 of your witness statement, you give us an 15 indication -- and I understand these numbers are 16 approximate -- of the number of members that you have 17 amongst police staff, and you tell us that it is 42,000 18 members. Approximately what percentage of the overall 19 number of police staff in the forces that you cover are 20 members of UNISON? 21 <b>A. On average we would have about 50 per cent of the 22 working population in membership. In each force.</b> 23 Q. Can you give us some idea -- obviously it will vary from 24 force to force, but what sort of proportion of the 25 workforce are police staff as opposed to police Page 30</p>	<p>1 association that looks after their interests? 2 <b>A. The Superintendents Association, yes, indeed.</b> 3 LORD JUSTICE LEVESON: Not perhaps surprisingly called that. 4 Right. 5 MR BARR: As to the forces whose staff you represent, you 6 tell us that you do not represent police staff who work 7 for the Metropolitan Police Service or for the City of 8 London Police. They are represented, aren't they, if 9 they want trade union representation, by the PCS, 10 Prospect and the FDA? 11 <b>A. That is right.</b> 12 Q. Having dealt with those matters, can we now turn to the 13 way in which you have sought to garner the views of your 14 members for the purposes of giving evidence today? You 15 sent out a letter, didn't you, to 49 different police 16 branches and you tell us that in fact the response you 17 got was surprisingly small; is that right? 18 <b>A. That's correct.</b> 19 Q. Presumably you from time to time, for varying reasons, 20 send out requests for views from your members. How does 21 the response to this request compare to other requests 22 that you've made? 23 <b>A. Well, I can confirm that of the 49 responses that were 24 solicited, I received two responses. That is an 25 extremely low response rate. We would normally expect Page 32</b></p>



<p>1 <b>to get at least half of our potential respondents to</b>  2 <b>communicate with us. It seems on this matter that for</b>  3 <b>whatever reason, and I have a few thoughts on that, that</b>  4 <b>our branches did not believe that this was, in terms of</b>  5 <b>UNISON's contribution to the Inquiry, something they</b>  6 <b>were particularly able to help with.</b>  7 Q. Perhaps you could share those thoughts with us.  8 <b>A. I followed up the very small number of responses that</b>  9 <b>I received, and the impression I had from talking to</b>  10 <b>colleagues was a perception that the Inquiry was</b>  11 <b>predominantly concerned with matters that related to the</b>  12 <b>Metropolitan Police and that some of the issues and</b>  13 <b>concerns that the Inquiry was examining were not of</b>  14 <b>themselves writ large in provincial forces. That may or</b>  15 <b>may not be correct and I don't make a judgment on that,</b>  16 <b>but certainly that was the outcome of some of the</b>  17 <b>conversations, limited though they were, that I had.</b>  18 Q. So that's the perception, at least --  19 <b>A. Yes.</b>  20 Q. -- of those members who had spoken to you?  21 LORD JUSTICE LEVESON: Actually, that itself is an important  22 fact. If true, that itself is important.  23 <b>A. Yes. Of course I can't verify that is the case.</b>  24 LORD JUSTICE LEVESON: No, I understand.  25 <b>A. But I think that is an important observation, yes.</b></p> <p style="text-align: center;">Page 33</p>	<p>1 anyway. Is there anything in particular that UNISON is  2 likely to be pushing for in ensuring that inappropriate  3 or unethical contact between the police and the press is  4 properly covered in any revised guidance?  5 <b>A. I think the terms of reference and indeed the already</b>  6 <b>published "Without fear or favour" document does</b>  7 <b>indicate that HMIC wants this matter to be dealt with,</b>  8 <b>and whilst we will have some views that I think possibly</b>  9 <b>we'll explore today about where the line might be drawn</b>  10 <b>around inappropriate contact, hospitality, gifts,</b>  11 <b>et cetera, we certainly do expect that to be a key part</b>  12 <b>of the consultation and we will certainly be majoring on</b>  13 <b>that when we provide our views.</b>  14 Q. I'll move now to the question of off-the-record  15 guidance, which you deal with on page 5 of your  16 statement. You tell us that UNISON doesn't provide any  17 guidance to members about off-the-record conversations  18 with the media. Do you expect the employing police  19 forces to do that?  20 <b>A. Yes, I think it was our clear view that we would not</b>  21 <b>ordinarily expect to be guiding our members who might</b>  22 <b>work in either a press capacity or indeed an operational</b>  23 <b>capacity in relation to their contact with the press</b>  24 <b>around operational matters. Clearly the union will</b>  25 <b>advise its members or its activists, its branch</b></p> <p style="text-align: center;">Page 35</p>
<p>1 MR BARR: If we move now to some specific topics, and can  2 I start first of all with ACPO's guidance. You deal  3 with this at paragraph 6 of your witness statement where  4 you tell us that generally speaking UNISON considers  5 ACPO's Communication Advisory Group 2010 guidance  6 relating to media matters to be helpful, but you do  7 identify a lacuna in that it doesn't deal to your  8 satisfaction with inappropriate or unethical contact  9 between the police and the press, and you tell us that  10 you want to see that lacuna dealt with as the HMIC's  11 recommendations arising from "Without fear or favour"  12 are dealt with and actioned.  13 Can I ask you: what role does UNISON expect to play  14 in any consultation exercise arising from the HMIC's  15 report?  16 <b>A. We would expect, as has been the case with all HMIC</b>  17 <b>consultations certainly since I've been doing this job,</b>  18 <b>that UNISON will be contacted as a stakeholder, as</b>  19 <b>a representative body within the Police Service, and</b>  20 <b>that our views and the views of our members' branches</b>  21 <b>would be sought as part of that. That is our clear</b>  22 <b>expectation.</b>  23 Q. I'm going to ask you a question; I suspect, given the  24 response you've told us about a moment ago, you may not  25 be able to go too far in answering it, but I'll ask it</p> <p style="text-align: center;">Page 34</p>	<p>1 <b>representatives, on contact with the press in relation</b>  2 <b>to trade union issues, around disputes, et cetera; that</b>  3 <b>would be a quite natural --</b>  4 Q. Quite different?  5 <b>A. Quite a different set of circumstances. So yes, we</b>  6 <b>would expect the police force in question to be</b>  7 <b>providing that guidance to its staff.</b>  8 Q. From the conversations that you have had with your  9 branches, what picture has been painted about the amount  10 of off the record contact that your members have with  11 the media?  12 <b>A. I think the reality is that police staff are less likely</b>  13 <b>to be involved in the sort of contacts with the media</b>  14 <b>that the Inquiry is particularly concerned with, because</b>  15 <b>of their relationship with investigations. My</b>  16 <b>conversations with UNISON members who are police press</b>  17 <b>officers suggest that it would be the senior</b>  18 <b>investigating officer who might be taken for a business</b>  19 <b>lunch by a journalist, because he or she would have the</b>  20 <b>overview of a particular investigation and the</b>  21 <b>journalist would be looking for a particular scoop or</b>  22 <b>a particular angle on that over-arching investigation.</b>  23 <b>Police staff, by nature of their work, tend to work</b>  24 <b>on discrete parts of an investigation. There will be</b>  25 <b>a scenes of crime officer or a fingerprint expert or</b></p> <p style="text-align: center;">Page 36</p>

<p>1 <b>a crime analyst, and he or she would not have the sort</b>                  2 <b>of overview of a particular crime that would enable him</b>                  3 <b>or her to give the sort of picture to a journalist that</b>                  4 <b>I think is probably looked for.</b>                  5 Q. When it comes to setting professional standards within                  6 a police force, are the standards expected common to                  7 staff and officers or are they different?                  8 <b>A. There is a common code of professional standards that</b>                  9 <b>was previously in place only for police officers. We</b>                  10 <b>certainly took the view as a union that in a service</b>                  11 <b>that aspires to be a one culture service, where officers</b>                  12 <b>and staff are working together as equals within teams,</b>                  13 <b>that actually the same standards should quite rightly</b>                  14 <b>apply to all in that workforce, and we were instrumental</b>                  15 <b>in bringing that code of professional standards into</b>                  16 <b>play for police staff working with ACPO, with the</b>                  17 <b>Association of Police Authorities, so yes, there is</b>                  18 <b>a common code.</b>                  19 Q. Does it follow that looking forward to any future                  20 guidance on dealings with the media by police, if I use                  21 that word deliberately, you would prefer to see common                  22 standards applied to both police officers and police                  23 staff in relation to their dealings, even if the ground                  24 truth is that your members are rather less likely to                  25 deal with the press?</p> <p style="text-align: center;">Page 37</p>	<p>1 MR BARR: Does it come to this: you're saying the moral and                  2 ethical standards that should be applied should be                  3 uniform, albeit the individual duties of people at                  4 different levels and different roles will differ?                  5 <b>A. Yes. I think we start from a presumption that they</b>                  6 <b>should be the same, but I think looking in detail at</b>                  7 <b>roles would be a part of that investigation and</b>                  8 <b>consideration.</b>                  9 Q. You tell us on page 6 of your statement a little about                  10 leaks, and I'm interested in picking up on what you say                  11 in paragraph 23, where you say:                  12 "There are many reasons why leaks are believed to                  13 take place, including ..."                  14 And the first thing you mention is "lack of                  15 confidence in whistle-blowing mechanisms".                  16 Can I ask you, from your experience of representing                  17 your members, what sort of level of confidence is there                  18 in police whistle-blowing policies?                  19 LORD JUSTICE LEVESON: Well, you have to be a bit careful                  20 here because there's an anterior question. Is this                  21 general from your experience as a trade union official                  22 across a wide range of occupations, that lack of                  23 confidence in whistle-blowing mechanisms, which I can                  24 understand, or is this intended to be specific to the                  25 police, given the response you got and all the</p> <p style="text-align: center;">Page 39</p>
<p>1 <b>A. Yes, we would take that position.</b>                  2 LORD JUSTICE LEVESON: Is that quite right? Because it may                  3 very well be an appropriate part of an SIO's duty to                  4 speak to the press. It's quite difficult to see why it                  5 would ever be a part of a scenes of crimes officer's                  6 duty to speak to the press, therefore why would the                  7 rules necessarily be the same?                  8 <b>A. I think one would want to see rules which covered all</b>                  9 <b>eventualities, so there would be potentially the</b>                  10 <b>on-the-record conversation between the senior</b>                  11 <b>investigating officer and/or his police staff</b>                  12 <b>equivalent, but there might also be more informal</b>                  13 <b>contacts. Police staff press officers, for example, who</b>                  14 <b>we do represent, might find themselves in that position,</b>                  15 <b>for example.</b>                  16 LORD JUSTICE LEVESON: Yes, I can see why press officers are                  17 different, but what I'm really saying is that the rules                  18 have to be consistent, but they're not necessarily the                  19 same, depending upon the occupation of the person                  20 affected.                  21 <b>A. No, I think it would be fair to say that were we engaged</b>                  22 <b>in the process of developing those rules, there would be</b>                  23 <b>an element of proportionality that might have to apply</b>                  24 <b>in the application of X, Y and Z, and that the role and</b>                  25 <b>occupation might be taken into account.</b></p> <p style="text-align: center;">Page 38</p>	<p>1 limitations that you've put around it?                  2 <b>A. Sure. In terms of my work, the figures that are</b>                  3 <b>provided at the beginning of the witness statement in</b>                  4 <b>terms of the number of members we represent gives you an</b>                  5 <b>indication of what proportion of my work relates to</b>                  6 <b>police staff, and it is the majority of the work that</b>                  7 <b>I do. So I have a view across policing, probation and</b>                  8 <b>CAFCASS, although I've worked in other areas of the</b>                  9 <b>union previously.</b>                  10 <b>I think in this context, and I'm limiting my</b>                  11 <b>comments to policing and an impression that I've</b>                  12 <b>gathered over a number of years as to confidence in</b>                  13 <b>whistle-blowing, and if I can develop that, I think it's</b>                  14 <b>a lack of confidence that relates in policing</b>                  15 <b>particularly to the working environment of the Police</b>                  16 <b>Service, and you will appreciate that policing is</b>                  17 <b>a disciplined service. It is a very hierarchical and</b>                  18 <b>authoritarian workplace. Police staff are part of that</b>                  19 <b>workforce and much work is being done to integrate them</b>                  20 <b>better in that workforce than was perhaps previously the</b>                  21 <b>case, but they do on occasion feel themselves to be</b>                  22 <b>second class citizens in a service that's predominantly</b>                  23 <b>police officer led, and particularly in terms of the</b>                  24 <b>management structure, and there is a view amongst our</b>                  25 <b>members and our branches that it is very difficult to be</b></p> <p style="text-align: center;">Page 40</p>

<p>1 <b>seen to rock the boat within a service such as that.</b></p> <p>2 <b>I'm not aware in recent years of any public interest</b></p> <p>3 <b>disclosures that have taken place, and there is an</b></p> <p>4 <b>atmosphere within police forces that I think makes it</b></p> <p>5 <b>very difficult for a member of police staff to raise</b></p> <p>6 <b>a particular concern, particularly if he or she is</b></p> <p>7 <b>ranged against very powerful authority within that</b></p> <p>8 <b>particular employer, and I hope that paints you</b></p> <p>9 <b>a picture of some of the difficulties that might be</b></p> <p>10 <b>faced, particularly in policing when compared to other</b></p> <p>11 <b>parts of the public sector, where there may be</b></p> <p>12 <b>a slightly more egalitarian feel to the workplace.</b></p> <p>13 MR BARR: I suppose we need to be careful to distinguish</p> <p>14 between a complaint and blowing the whistle on some</p> <p>15 wrongful behaviour, and it's very much the latter that</p> <p>16 I want to concentrate on.</p> <p>17 What measures would you suggest could be taken to</p> <p>18 improve the level of confidence of your members in</p> <p>19 whistle-blowing procedures in police forces?</p> <p>20 <b>A. Sure. I would like to think that as an outcome</b></p> <p>21 <b>certainly of the HMIC review and potentially also of</b></p> <p>22 <b>this Inquiry, that work be done to review the</b></p> <p>23 <b>effectiveness of whistle-blowing mechanisms within the</b></p> <p>24 <b>Police Service and to examine whether those current</b></p> <p>25 <b>procedures have been used, whether they have been</b></p> <p style="text-align: center;">Page 41</p>	<p>1 Q. You deal at the bottom of the page, paragraph 26, with</p> <p>2 the topic of hospitality, and on the face of your</p> <p>3 statement you express a very firm view about</p> <p>4 hospitality. You say:</p> <p>5 "UNISON takes the view that hospitality and</p> <p>6 gratuities, in the increasingly commercial environment</p> <p>7 in which the Government is forcing the Police Service to</p> <p>8 operate, are not acceptable in any form."</p> <p>9 You go on to point out:</p> <p>10 "Commercial interests have a real potential to</p> <p>11 corrupt the service, and senior leaders in the police</p> <p>12 should do the right thing and rule out the hospitality</p> <p>13 gravy train in its entirety."</p> <p>14 Can we explore that view a little bit? First of</p> <p>15 all, are you referring to hospitality provided by third</p> <p>16 parties or hospitality provided by the police or both?</p> <p>17 <b>A. I think both.</b></p> <p>18 Q. In terms of what you mean by "hospitality", are you</p> <p>19 ruling out really absolutely everything, including the</p> <p>20 offer of a cup of tea, or do you accept that there has</p> <p>21 to be some threshold somewhere?</p> <p>22 <b>A. I've been interested to hear some of the discussion</b></p> <p>23 <b>whilst sitting in the Inquiry today, and it certainly</b></p> <p>24 <b>does seem to me that if we take a very wide definition</b></p> <p>25 <b>of hospitality, attending a conference and eating</b></p> <p style="text-align: center;">Page 43</p>
<p>1 <b>essentially left on the shelf. That would be a very</b></p> <p>2 <b>useful piece of work and one which I think, were we to</b></p> <p>3 <b>arrive at a better system to allow staff the confidence</b></p> <p>4 <b>to raise issues, would be a very positive outcome.</b></p> <p>5 Q. If I move now to the question of press officers,</p> <p>6 paragraph 25 of your witness statement, you, if I've</p> <p>7 understood the tone of your witness statement correctly,</p> <p>8 placed a great deal of emphasis and want to convey your</p> <p>9 opinion that press officers have a very valuable</p> <p>10 function to play, in particular that the feedback you've</p> <p>11 received is that they help to solve a great deal of</p> <p>12 crime. Is that fair?</p> <p>13 <b>A. Yes, I think that is fair. I was struck in the albeit</b></p> <p>14 <b>limited conversations I had with UNISON members who do</b></p> <p>15 <b>work in press for the police that there were numerous</b></p> <p>16 <b>occasions that they cited where contact with the press</b></p> <p>17 <b>had been beneficial, that it had produced results in</b></p> <p>18 <b>terms of witnesses coming forward in relation to crimes</b></p> <p>19 <b>or missing persons that would not otherwise have been</b></p> <p>20 <b>the case, perhaps in the publication of photographs or</b></p> <p>21 <b>indeed names of victims, and that is seen as a very</b></p> <p>22 <b>positive relationship.</b></p> <p>23 <b>Of course, what I'm describing there are everyday</b></p> <p>24 <b>on-the-record contacts between police, press officers</b></p> <p>25 <b>and the media.</b></p> <p style="text-align: center;">Page 42</p>	<p>1 <b>a dinner at that conference with tens or potentially</b></p> <p>2 <b>hundreds of other people was not really what I was</b></p> <p>3 <b>referring to in describing hospitality. So I think</b></p> <p>4 <b>I accept your point that this may seem overly definitive</b></p> <p>5 <b>and would need to be clarified, but I think hospitality</b></p> <p>6 <b>in respect of an individual or individuals, excepting</b></p> <p>7 <b>perhaps in a private dinner or accepting a private gift,</b></p> <p>8 <b>I can see and the union can see no place for those</b></p> <p>9 <b>activities within a transparent and open Police Service.</b></p> <p>10 <b>I suppose I'm forced to ask the question: how would</b></p> <p>11 <b>policing suffer, what part of policing would suffer, if</b></p> <p>12 <b>those opportunities were simply ruled out full stop and</b></p> <p>13 <b>the agonising of individual officers or staff as to</b></p> <p>14 <b>whether they could or couldn't accept a gift or</b></p> <p>15 <b>a private dinner or a business lunch were ruled out? It</b></p> <p>16 <b>seems to me that the business lunch that the senior</b></p> <p>17 <b>investigating officer attends could be replaced by the</b></p> <p>18 <b>officer saying to the journalist, "I have a very good</b></p> <p>19 <b>office in my police station, would you like to come in</b></p> <p>20 <b>and have a cup of tea and we'll talk these things over?"</b></p> <p>21 <b>It does seem to me that there has been a very great</b></p> <p>22 <b>difficulty on the part of staff and officers potentially</b></p> <p>23 <b>in interpreting what it is or isn't acceptable and some</b></p> <p>24 <b>very clear lines on that, we feel, should be drawn.</b></p> <p>25 LORD JUSTICE LEVESON: Common courtesy of a cup of tea or</p> <p style="text-align: center;">Page 44</p>

<p>1 a cup of coffee is one thing, but going out for a rather 2 more expansive lunch is something else.</p> <p>3 <b>A. Yes, I think we would take that view and we would 4 certainly be making this point in responding to the HMIC 5 or service consultation on this, that it would be better 6 to draw some very tight definitions to help staff and 7 officers in the better performance of their duties.</b></p> <p>8 MR BARR: Would you accept that there may be circumstances 9 in which people working for the police are often offered 10 gifts or hospitality in certain circumstances where to 11 turn it down might cause offence and in those 12 circumstances it might be better to accept the 13 hospitality, obviously declaring it in the register and 14 not necessarily keeping any gift? Do you see that that 15 circumstance might arise?</p> <p>16 <b>A. I think the Police Service very often is in a position 17 where it has to provide offence to people, and I think 18 turning down gifts is probably not the most serious of 19 those, and I think, frankly, if it were made very clear 20 that the Police Service is no longer in the business of 21 accepting gifts or gratuities, those people who might 22 wish to offer it would be in a very clear position that 23 it was no longer appropriate.</b></p> <p>24 LORD JUSTICE LEVESON: I've looked at the register and it 25 might be that a delegation of visiting police officers</p> <p style="text-align: center;">Page 45</p>	<p>1 <b>that was a modus operandi in the press office that 2 everyone adhered to. Clearly that particular procedure 3 does not apply to off-the-record discussions that senior 4 investigating officers, for example, might have. That 5 was my impression.</b></p> <p>6 LORD JUSTICE LEVESON: But there's no reason why it 7 shouldn't.</p> <p>8 <b>A. Absolutely not.</b></p> <p>9 LORD JUSTICE LEVESON: Because "off the record" doesn't mean 10 to say off the police's record.</p> <p>11 MR BARR: Thank you, those were all my questions.</p> <p>12 <b>A. Thank you.</b></p> <p>13 LORD JUSTICE LEVESON: Thank you very much indeed and thank 14 you for coming.</p> <p>15 <b>A. Thank you.</b></p> <p>16 LORD JUSTICE LEVESON: We'll have a short break. 17 (3.19 pm) 18 (A short break) 19 (3.26 pm)</p> <p>20 LORD JUSTICE LEVESON: Yes, Mr Jay?</p> <p>21 MR JAY: The next witnesses we're going to take together, 22 Mr Cunningham and Mr Fegan, please.</p> <p>23 LORD JUSTICE LEVESON: Thank you very much. 24 MR IAN NEIL FEGAN (affirmed) 25</p> <p style="text-align: center;">Page 47</p>
<p>1 from another country bring a badge representing their 2 police force or some small token representing their 3 country that has no real monetary value of any sort. 4 You don't include that. You're talking about something 5 rather more tangible?</p> <p>6 <b>A. Yes, indeed. If one visits police stations normally 7 those gifts are on prominent display and the sense one 8 has is that they belong to the force, that they are not 9 subject to individual ownership. So yes, I think that 10 is an absolutely correct point.</b></p> <p>11 MR BARR: Finally if I can take you to paragraph 27, where 12 you deal with Elizabeth Filkin's report, obviously 13 accepting straight away that that report is directed 14 towards the Metropolitan Police and not to those 15 services whose staff you represent. You tell us that 16 her recommendation 4 in respect of creating a personal 17 contact log with the press is already in place in many 18 police press offices. Are you able, from the 19 conversations that you've had with your branches, to 20 help us with whether or not in those forces it's been 21 a workable and effective practice?</p> <p>22 <b>A. The contact that I've had, which led to this part of our 23 submission, our statement, was with police press 24 officers, and my clear understanding following those 25 discussions was that that was what they worked to, that</b></p> <p style="text-align: center;">Page 46</p>	<p>1 MR MIKE CUNNINGHAM (sworn) 2 Questions by MR JAY</p> <p>3 MR JAY: Please sit down. I'm going to invite you to give 4 us your full names and attest to the contents of your 5 witness statement. First of all, Mr Cunningham.</p> <p>6 MR CUNNINGHAM: Yes, I'm Michael Cunningham.</p> <p>7 Q. Your witness statement is dated 13 February of this 8 year. I'm sure you've signed and dated it, it doesn't 9 matter in particular. Are you content to put this 10 forward as your formal evidence to the Inquiry, 11 Mr Cunningham?</p> <p>12 MR CUNNINGHAM: Yes, I am.</p> <p>13 Q. And you, Mr Fegan, your full name please?</p> <p>14 MR FEGAN: Ian Neil Fegan.</p> <p>15 Q. Thank you. Your statement likewise dated 28 February, 16 is this your formal evidence to the Inquiry?</p> <p>17 MR FEGAN: Yes, it is.</p> <p>18 Q. I'm going to deal with your careers and current 19 positions first of all. First of all you, 20 Mr Cunningham. You are currently the Chief Constable of 21 Staffordshire Police and have been since September 2009. 22 You joined the Lancashire Constabulary in 1987. You 23 worked your way up the ranks there. Indeed, I think 24 that's the only force you have served in before 25 Staffordshire.</p> <p style="text-align: center;">Page 48</p>

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<p>1 MR CUNNINGHAM: That's correct.                  2 Q. You were Deputy Chief Constable of Lancashire in August                  3 2007 and aside from your responsibilities as Chief                  4 Constable you are the ACPO lead in professional                  5 standards and you assumed that portfolio last summer?                  6 MR CUNNINGHAM: That's correct.                  7 Q. So that we understand it, we've heard reference to 14                  8 business groups within ACPO. The professional standards                  9 portfolio is not a business group in its own right, it                  10 is within the workforce development business group?                  11 MR CUNNINGHAM: Yes, that's correct.                  12 LORD JUSTICE LEVESON: Good time to get that particular                  13 brief.                  14 MR CUNNINGHAM: It was, it was.                  15 MR JAY: We'll cover the detail of that in a moment, after                  16 I've introduced Mr Fegan.                  17 You are a graduate of the University of Wales,                  18 postgraduate member of the Chartered Institute of                  19 Marketing. You've worked for Staffordshire for 13 years                  20 and since January 2010 you are Head of Corporate                  21 Communication?                  22 MR FEGAN: That's right.                  23 Q. The number of people you are responsible for, your                  24 department, is staffed by 19 full time equivalent posts?                  25 MR FEGAN: That's right.</p> <p style="text-align: center;">Page 49</p>	<p>1 explain why, particularly those in security or private                  2 investigation sectors, family members and friends with                  3 criminal associations, et cetera. The media was also                  4 identified as a source of corruption, with                  5 "confidential, sensitive or secret information sought by                  6 journalists in return for financial inducements or                  7 payments through gifts and hospitality."                  8 Financial inducements I think is self-evident, but                  9 how significant a risk was this in relation to what you                  10 call payments through gifts and hospitality?                  11 MR CUNNINGHAM: That in itself as an issue was not                  12 identified as a significant risk. The assessment has                  13 identified that the police officers have broadly two                  14 commodities with which they would trade, if I could put                  15 it that way. One is influence and the other is                  16 information. It seems from a chief officer from ACPO                  17 perspective that we need to put safeguards in place in                  18 order to handle safely the information that we hold and                  19 the relationships that officers have and develop, which                  20 could become corrupt.                  21 And so in terms of assessing the risk, the                  22 unauthorised handling of information is a significant                  23 risk for the service. And that's been identified in the                  24 SOCA strategic assessment of corruption.                  25 In order to deal with the handling of information</p> <p style="text-align: center;">Page 51</p>
<p>1 Q. We're going to deal first of all, Mr Cunningham, with                  2 your ACPO responsibilities and then Staffordshire. In                  3 terms of ACPO, the second page of your statement, 02372,                  4 the remit of the portfolio, there are six components of                  5 it. Does it break down into three separate groups, as                  6 it were: complaints and misconduct, counter corruption                  7 and vetting?                  8 MR CUNNINGHAM: That's correct. In (iii) on page 2, that                  9 sets out the three areas which report in to me under the                  10 professional standards umbrella.                  11 Q. Thank you. We're not concerned, obviously, with                  12 vetting. It's possibly the first two, complaints and                  13 misconduct and counter corruption, with the emphasis                  14 perhaps most on counter corruption?                  15 MR CUNNINGHAM: Yes.                  16 Q. ACPO guidance, page 02374, the ACCAG guidance for the                  17 investigation of corruption -- sorry, remind us, please,                  18 ACCAG is an acronym for what?                  19 MR CUNNINGHAM: That's the association -- the ACPO Counter                  20 Corruption Advisory Group.                  21 Q. You first published in 2003, last formally revised in                  22 2006?                  23 MR CUNNINGHAM: Yes.                  24 Q. It identified some common factors as potential                  25 corruptors, including former police officers, and you</p> <p style="text-align: center;">Page 50</p>	<p>1 and protecting information, a number of safeguards have                  2 been put in place, which I can describe to you if you                  3 wish, but contingent upon all of those are relationships                  4 which officers subsequently develop. Family and friends                  5 was identified as the highest risk in terms of the                  6 unlawful disclosure of information. Former colleagues,                  7 particularly those in the private security industry, was                  8 also a risk. At the point in which the strategic                  9 assessment was done in the summer of 2010, journalists                  10 were identified as a risk, but not as high a risk as                  11 those other groups.                  12 Q. Family and friends would be the highest risk, but that                  13 would usually be inadvertent disclosure to family and                  14 friends, wouldn't it?                  15 <b>A. It would be inadvertent disclosure on some occasions.                  16 On other occasions it would be criminal. So there are                  17 examples of, you know, an officer checking out the                  18 daughter's new boyfriend through to officers who have                  19 criminals who are part of their family and actively                  20 seeking intelligence and information from police systems                  21 and passing that on.</b>                  22 Q. The police systems you refer to, the main risk may be                  23 the Police National Computer, mightn't it?                  24 MR CUNNINGHAM: Actually more likely, Mr Jay, would be force                  25 intelligence systems, so force intelligence systems</p> <p style="text-align: center;">Page 52</p>

<p>1 would be accessible by all officers under the normal 2 routine run of their duties, and safeguards need to be 3 put in place as to how officers handle the information 4 that's available to them.</p> <p>5 Q. Thank you. You refer on the next page, 02375, to the 6 Schedule to the Police (Conduct) Regulations of 2008 and 7 related Home Office guidance. When you refer in italics 8 there to the relevant standards for police officers and 9 staff, is that within the schedule to the regulations 10 you were referring to?</p> <p>11 MR CUNNINGHAM: Yes, it is.</p> <p>12 Q. And so if there is a breach of any of those standards, 13 then by definition there is a disciplinary offence?</p> <p>14 MR CUNNINGHAM: The disciplinary offence then would be 15 measured against the standard, in the police conduct 16 regulations, and the guidance that's set out in italics 17 there would assist the person who's making a judgment in 18 relation to that breach in order to form a view as to 19 the severity of that breach.</p> <p>20 Q. Most of the guidance is common sense and 21 self-explanatory, but as you say, it sets out a series 22 of touchstones by which a question of breach of the 23 regulations would be assessed?</p> <p>24 MR CUNNINGHAM: Exactly.</p> <p>25 Q. Presumably or maybe you can assist on this: are the</p> <p style="text-align: center;">Page 53</p>	<p>1 complete and has been approved by Chief Constables' 2 Council. I can -- if it would assist the Inquiry, 3 I could submit a copy of that. Effectively that sets 4 out the core values of the service upon which other 5 guidance can then be framed.</p> <p>6 LORD JUSTICE LEVESON: When was that done?</p> <p>7 MR CUNNINGHAM: 2011, sir.</p> <p>8 MR JAY: I don't think we've seen it as part of this 9 Inquiry. I'm sure I would have remembered it.</p> <p>10 LORD JUSTICE LEVESON: So would I. Yes, please.</p> <p>11 MR CUNNINGHAM: Yes.</p> <p>12 MR JAY: So does it occupy the same sort of status as the 13 PSNI's code of ethics we saw yesterday or has it some 14 difference?</p> <p>15 MR CUNNINGHAM: It has some difference. The code of ethics 16 in the PSNI is effectively the discipline regulations -- 17 are the discipline regulations for the Police Service of 18 Northern Ireland in the same way as the 2008 regulations 19 are here. The code of -- the statement of mission and 20 values has been developed by the service, it's something 21 to which chief constables have signed up, which sets out 22 the principles which would effectively govern the good 23 conduct of officers to which they should aspire, to 24 which officers and staff should aspire in the normal 25 course of their duties.</p> <p style="text-align: center;">Page 55</p>
<p>1 regulations currently under review or is it thought that 2 this guidance is satisfactory as it stands?</p> <p>3 MR CUNNINGHAM: The police conduct regulations are under 4 review, but only to the extent that it is likely that 5 later this year they will also encompass unsatisfactory 6 performance as a way of making the consideration around 7 officers. What happens at the moment is that what 8 begins as a professional standards or a discipline 9 investigation may turn into something where the officer 10 is -- it is I say simply a performance issue, and the 11 conduit between redress for both of those needs to be 12 streamlined. That process is under way.</p> <p>13 The actual standards themselves, the ten standards 14 set out in the 2008 regulations, will remain.</p> <p>15 Q. Thank you. It may be helpful at this stage, since you 16 are in one sense the presiding mind of ACPO behind all 17 of this, to see where or what ACPO is doing in response 18 to the HMIC report and perhaps in anticipation of what 19 this Inquiry is doing.</p> <p>20 MR CUNNINGHAM: Yes.</p> <p>21 Q. Because I think we can bring it all together. First of 22 all there's the issue of a statement of mission and 23 values. Could you explain what that is and how you're 24 getting on with that?</p> <p>25 MR CUNNINGHAM: The statement of mission and values is</p> <p style="text-align: center;">Page 54</p>	<p>1 It should allow people, allow staff to help them 2 make good decisions. Effectively that was the purpose 3 of it.</p> <p>4 Q. So we're looking at a high level of generality, perhaps 5 principles of integrity, impartiality, honesty, the sort 6 of things you would expect to see and I'm sure they're 7 there, and in a fairly short document?</p> <p>8 MR CUNNINGHAM: They are, they're in a very short document. 9 They are stating things such as acting with integrity, 10 compassion and courtesy, using discretion, professional 11 judgment -- I'm paraphrasing, obviously -- making every 12 effort to understand the needs of our communities, 13 responding to well-founded criticism with a willingness 14 to learn and to change, committed to deliver a service 15 that we and those we serve can be proud of and which 16 keeps our communities safe.</p> <p>17 Q. Is impartiality one of those as well?</p> <p>18 MR CUNNINGHAM: Just let me ...</p> <p>19 Q. It may be a general concept --</p> <p>20 MR CUNNINGHAM: "Showing neither fear nor favour in what we 21 do".</p> <p>22 Q. Thank you. Then we look at the specifics of ACPO work. 23 We heard Chief Constable Trotter yesterday speak to work 24 which is being undertaken -- I think it will be ready 25 fairly soon -- on police and press relations. That's</p> <p style="text-align: center;">Page 56</p>

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<p>1 one piece of work which is being considered by ACPO.  2 MR CUNNINGHAM: Yes.  3 Q. Maybe not within your particular portfolio, but it's of  4 interest to you?  5 MR CUNNINGHAM: It is. I have the responsibility to lead on  6 ACPO's response to the HMIC inspection report. There  7 are three principal sets of guidance which are being  8 developed. The first one is the one you allude to,  9 which Chief Constable Andy Trotter is leading on, and  10 that would be guidance in relation to police dealing  11 with the press and the media. The two others are -- the  12 first one is in relation to guidance in relation to the  13 acceptance of gifts and hospitality, and the third is in  14 relation to officers taking secondary employment or  15 having business interests.  16 LORD JUSTICE LEVESON: And you're doing gifts and  17 hospitality?  18 MR CUNNINGHAM: That's correct.  19 LORD JUSTICE LEVESON: And who is doing secondary  20 employment?  21 MR CUNNINGHAM: I am as well, sir.  22 I should also say, Mr Jay, it might assist, that one  23 of the other issues that was raised by HMIC, of course,  24 was the whole issue of corporate governance, and work is  25 being undertaken around recommendations for how</p> <p style="text-align: center;">Page 57</p>	<p>1 informed by current issues, so anything that comes out  2 of this Inquiry we will be taking into account, and we  3 will always be in a position to alter, change and  4 develop guidance as we go forward.  5 Q. So the evidence as it emerges from this Inquiry is in  6 one shape or form finding its way into the thinking  7 which is informing the three pieces of work you're  8 doing?  9 MR CUNNINGHAM: Absolutely.  10 LORD JUSTICE LEVESON: I don't want to be chicken and egg.  11 I'm very comfortable with that, but as I said to  12 Mr Trotter yesterday, I am very keen that I get the  13 benefit of the collective experience of extremely senior  14 police officers who know policing very much better than  15 I ever could know it, so your views would be very  16 valuable. And where there is a difference -- I mean  17 you'll obviously settle upon a policy and that's fine,  18 but if there is any area where there is a difference in  19 views, I would be grateful if ACPO would be prepared not  20 merely to tell me how they have resolved it, but also to  21 explain the difference and the different reasons for  22 those views, because that would help also inform me and  23 the analysis which I provide, which then of course will  24 always come back to you to think about.  25 MR CUNNINGHAM: Absolutely, sir, and again if it would</p> <p style="text-align: center;">Page 59</p>
<p>1 corporate governance could be enhanced across the  2 service, and we have engaged with the organisation, the  3 counter corruption organisation Transparency  4 International, who are doing some work for the service  5 in relation to recommendations on corporate governance.  6 MR JAY: When will all of these be ready, the ACPO work?  7 MR CUNNINGHAM: The specific three pieces of guidance that  8 I've alluded to will be taken to Chief Constables'  9 Council on 19 April. They will be in draft form at that  10 point, in order to allow us to consult with other chief  11 constables so that we can take that further.  12 Q. Which of these are provisional or temporary, if I can  13 describe it in those terms, in the sense that they're  14 awaiting further input from this Inquiry, and which of  15 them are going to be standard guidance which lasts the  16 usual three or five years?  17 MR CUNNINGHAM: Effectively the media guidance is being  18 entitled "interim guidance" at this point, because  19 clearly we are awaiting the outcome of this Inquiry in  20 order to take on board the recommendations that come out  21 of this. It may also be that gifts and hospitality  22 guidance will also be affected by the outcome of this  23 Inquiry.  24 What we are committed to is making sure that the  25 guidelines that we do take on for the service are fully</p> <p style="text-align: center;">Page 58</p>	<p>1 assist the Inquiry, I'm more than happy to submit any  2 draft guidance that we're preparing to the Inquiry so  3 that you can see the line of thinking that we've adopted  4 to date.  5 LORD JUSTICE LEVESON: Yes. If you're going back to the  6 council in April, I won't come out with anything before  7 April, and provided it's pretty promptly thereafter,  8 then that's sufficient and then I have your thinking  9 then.  10 MR CUNNINGHAM: Okay.  11 LORD JUSTICE LEVESON: But I will, of course, consider very  12 carefully anything, and any competing views which ACPO  13 care to share with me.  14 MR CUNNINGHAM: Thank you very much, sir.  15 MR JAY: Is this also part of the thinking, that ACPO  16 self-evidently is laying down national guidance, you'll  17 expect individual forces throughout the land to apply  18 the principles in the national guidance to their local  19 areas?  20 MR CUNNINGHAM: Yes. I think this is going to be the  21 challenge for the service, Mr Jay. We clearly, I think,  22 acknowledge and agree with HMIC that national guidance  23 is required in these areas. We previously haven't had  24 national standards in relation to the three areas I've  25 discussed. What will be a challenge will be to phrase</p> <p style="text-align: center;">Page 60</p>

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<p>1 that guidance in such a way as it can be applied to very                  2 different circumstances in different places. It needs                  3 to be sufficiently high level to be applicable to those                  4 different circumstances, yet sufficiently detailed to be                  5 meaningful. That's the balance we're trying to strike.                  6 Q. You've given us, if I can properly describe it as such,                  7 a sneak preview in relation to one aspect of the gifts                  8 and hospitality guidance. At 02380, you say:                  9 "I anticipate this response [that's to HMIC] will                  10 include more definitive guidance to the Police Service                  11 on boundaries of acceptability of gifts and hospitality                  12 and will likely commence with the clear presumption that                  13 no gift, gratuity or hospitality should ever be sought                  14 by any officer at any level within the service. The                  15 only hospitality offer that can or should be acceptable                  16 extends only to the provision of minimal and ordinary                  17 hospitality during the course of any meeting and/or                  18 function in line with common courtesy."                  19 Et cetera. So that's what we're likely to see in                  20 the final version, are we?                  21 MR CUNNINGHAM: It is indeed, yes.                  22 Q. Does this spring from the concerns you identify on                  23 page 02381 at the top, the huge damage, you say, to                  24 public trust and confidence in relation to the occasions                  25 when police dealings with the media have been less than</p> <p style="text-align: center;">Page 61</p>	<p>1 officers who --                  2 LORD JUSTICE LEVESON: Moonlighting? They're doing a job                  3 one day and in the evening they're doing something else?                  4 MR CUNNINGHAM: That's right. At the moment there is                  5 a variation in what is deemed to be acceptable as                  6 secondary employment across the country. HMIC have                  7 identified that in their report and we need to look at                  8 the decision-making which allows officers and staff to                  9 have secondary employment and the guidance for those                  10 people making decisions so that we can have some                  11 consistency.                  12 The watchwords for the ACPO response to HMIC are                  13 "consistency" and "transparency". We're trying to have                  14 those issues writ large in anything that we do.                  15 LORD JUSTICE LEVESON: Well, what about post-employment                  16 positions?                  17 MR CUNNINGHAM: That's an issue that is currently in the                  18 early stages of discussion, sir. We are keen to have                  19 the debate on post-Police Service employment, but it                  20 would be an exaggeration for me to say that active work                  21 was under way in relation to it.                  22 MR JAY: This may be something you would move on to after                  23 completing the substantial work on the three matters --                  24 MR CUNNINGHAM: I can sense it coming, yes.                  25 LORD JUSTICE LEVESON: Told you it was a good brief! Yes.</p> <p style="text-align: center;">Page 63</p>
<p>1 professional, and then you refer to the roots in the                  2 events in the summer of last year?                  3 MR CUNNINGHAM: Yes, I think there are two points I'd like                  4 to make in relation to that. ACPO is approaching these                  5 issues with real energy and the reason for that is we do                  6 recognise that the issues under examination at the                  7 moment have potential and have been immensely damaging                  8 to public confidence. Immensely damaging to the                  9 relationship upon which we build effective policing.                  10 Because of that corrosive nature of the issues that                  11 we're dealing with, we need to approach this very                  12 quickly.                  13 We are heartened but absolutely not complacent by                  14 the fact that HMIC, IPCC and other people who have                  15 scrutinised the police agree that corruption and                  16 malpractice is not endemic or systemic. However, the                  17 actions of individuals, particularly senior individuals,                  18 has been and can be highly damaging. That's why we need                  19 to act with the urgency with which we're addressing                  20 this.                  21 Q. The work you're doing on secondary employment of                  22 business interests, is that going to cover specifically                  23 the issue of moving from the Police Service and then                  24 working in the media?                  25 MR CUNNINGHAM: No, it's not. It's going to deal with</p> <p style="text-align: center;">Page 62</p>	<p>1 MR JAY: The issue of leaks, which you cover generically.                  2 Understandable: the questions which were asked of you                  3 were at a high level of generality. Question 16 and the                  4 answer you give at page 02383, when you identify the                  5 different possible root causes for leaks. Do all or                  6 each of these fall within your own experience as                  7 a police officer, obviously looking at what others have                  8 done?                  9 MR CUNNINGHAM: Yes, I think it's fair to say at the moment                  10 the most common leak or the most common approach to the                  11 press is normally from disgruntled members of staff who                  12 have a beef about organisational issues. The service is                  13 going through significant change, as I know you're                  14 aware, and the changes within the organisation, some                  15 staff feel that they need to vent their anger at the                  16 organisation through the press. So that's the most                  17 common type of leak that we're having at the moment.                  18 Q. The need for balance is something you touch on in your                  19 answer to question 17, page 02384. Seven lines from the                  20 bottom:                  21 "The response of the Police Service will need to                  22 consider carefully how best to address this issue                  23 without causing any unnecessarily or overly risk averse                  24 approach which constrains police and media relationships                  25 and is ultimately a disservice to the public."</p> <p style="text-align: center;">Page 64</p>



<p>1 I believe you're someone who favours greater rather 2 than lesser interaction with the media? 3 MR CUNNINGHAM: Yes. 4 Q. Have I correctly understood the position? 5 MR CUNNINGHAM: That is absolutely my position. I am trying 6 to encourage the staff I have responsibility for to have 7 a professional and open relationship with the press, one 8 in which they are confident when they are put on the 9 spot or questioned by the press or have an issue which 10 they wish to discuss with the press that they have the 11 confidence and the professionalism to know how to do 12 that effectively. 13 LORD JUSTICE LEVESON: Well, it won't surprise you that you 14 may have heard that that's precisely the view that 15 I have been suggesting to a number of your colleagues 16 over the last few days. 17 MR CUNNINGHAM: And, sir, I think that one of the 18 reflections I've had on that is that actually staff to 19 some degree are afraid of speaking to the press, and as 20 somebody with leadership responsibilities it seems to me 21 that we have the responsibility to try and give them the 22 equipment to be able to do that properly. I think 23 that's in the public interest and in the interests of 24 the service. 25 LORD JUSTICE LEVESON: Lack of confidence can be dealt with</p> <p style="text-align: center;">Page 65</p>	<p>1 For staff to feel that they need to do that in an 2 unauthorised way is regrettable, and at times can be 3 damaging, of course. 4 Q. The answer to Mr O'Neill is that he'll get his 5 information, but in the right way, through a system 6 which is more open and transparent rather than through 7 the side door or perhaps even the back door, is that 8 fair? 9 MR CUNNINGHAM: I think that must be the desirable outcome. 10 Q. Thank you. I move on now, unless there are any specific 11 points Mr Cunningham that you wish to draw out from your 12 written evidence, can I move on now to Staffordshire? 13 It may be we can take this fairly broadly, because we've 14 heard a fair amount of evidence now from the regional 15 forces and their relationships with the regional press. 16 How would you, Mr Cunningham, and then Mr Fegan, 17 characterise the nature of your relationship, first with 18 the regional press and secondly, I suppose, more rarely, 19 with the national press? 20 MR CUNNINGHAM: It is correct, my dealings with the national 21 press are more rare. The dealings with the regional 22 press, the local press within Staffordshire are quite 23 regular, professional, open. I think the local press 24 have an understanding of Staffordshire Police and know 25 individuals within it, so I think they have an</p> <p style="text-align: center;">Page 67</p>
<p>1 by training. The more important question is whether 2 they have the balance right as to what it is appropriate 3 to put into the public domain. 4 MR CUNNINGHAM: Yes. 5 MR JAY: I just raise with you we heard from the crime 6 editor of the Times I think last week along the lines 7 that the majority, nearly all of his public interest 8 stories derive from information -- his term -- which the 9 police had given him which he knows to be unauthorised 10 in the sense that the Police Service as a whole would 11 rather it didn't enter the public domain, so this is an 12 informal exchange. Police might not like it, but it's 13 in the public interest nonetheless. How, if at all, do 14 you address that issue? 15 MR CUNNINGHAM: Obviously if information is being passed to 16 the press in an unauthorised manner, that is not 17 a desirable situation. The flipside of that is that 18 I think the service should reflect on how open and 19 transparent we are with issues that sometimes we might 20 consider not to be in the public interest. So I think 21 there is a place for us to think more openly about how 22 we communicate with the public through the press and 23 that's a matter which I think the service should and 24 ought to be taking on and we are taking on as we speak 25 through the guidance that's been developed.</p> <p style="text-align: center;">Page 66</p>	<p>1 understanding of where we currently are, what our 2 priorities are. 3 I put in place opportunities to speak to press 4 people myself, formal opportunities, which are recorded, 5 which gives them an insight into where we are as an 6 organisation and the policing priorities we have, and as 7 I've just been saying, I'm endeavouring to encourage the 8 staff of Staffordshire Police to have an open and 9 professional relationship with the local press. 10 National press, my dealings with them are very rare, 11 and so in that sense I couldn't characterise those 12 dealings because they're not often enough to have those 13 characteristics. 14 Q. Right. Mr Fegan, what's your take on this? 15 MR FEGAN: I think I completely agree with the chief. Our 16 relationships are generally very professional, 17 businesslike, certainly with the local and the regional 18 media. When you look at the amount that we sort of deal 19 with overall, we have a Press Bureau system similar to 20 other forces and I did an analysis on that and that 21 showed what I thought we all knew in the force, that 22 around about 5 per cent, less than 5 per cent of all of 23 our enquiries are from the national media, whereas 24 39 per cent are from three daily newspapers at 25 Staffordshire, so you can see that our focus, because of</p> <p style="text-align: center;">Page 68</p>

<p>1 our geography and where we are, is really with the local 2 and regional media, with whom we have the closest 3 relationships. 4 Our relationship with the national media is really 5 when we have a specific news event that we're responding 6 to. 7 LORD JUSTICE LEVESON: You've not had in Staffordshire one 8 of those inquiries which have blown up in the same way 9 that we've seen in other forces with -- well, Bird up in 10 Cumbria or Joanna Yeates in Bristol. No experience like 11 that? 12 MR CUNNINGHAM: Not since I've been chief. 13 LORD JUSTICE LEVESON: I'm not encouraging you. 14 MR CUNNINGHAM: Okay. 15 MR JAY: Mr Fegan, you say at page 10028, level with the 16 upper hole punch, in the context of the national media: 17 "... I think it is also fair to assert that the 18 national media is, by its very nature, much less 19 committed to, or socially responsible for, specific 20 geographic communities in our county -- unlike the local 21 media. This has a significant dynamic upon 22 relationships." 23 That's a polite way of saying perhaps that the 24 relationships are less good, is it? 25 MR FEGAN: I think they're certainly different, Mr Jay.</p> <p style="text-align: center;">Page 69</p>	<p>1 national media could learn things from their colleagues 2 in the regional/local media. 3 Q. In terms of how your force deals with the press, the 4 first instance or the normal course is that the entry 5 point will be through your office, Mr Fegan, and then, 6 if necessary, you'll put the journalist in touch with 7 the relevant police officer, unless there is 8 pre-existing contact between the journalist and the 9 police officer; is that broadly speaking right? 10 MR FEGAN: That's correct, yes. 11 Q. I've been asked to put this to you, again by a core 12 participant: as a matter of policy, would you find it 13 preferable for all traditional media requests to come 14 through your office rather than there being any direct 15 contact? 16 MR FEGAN: No, not really. Again, I think the evidence 17 shows this, we have pre-existing relationships at local 18 policing team level within Staffordshire where local 19 policing team commanders have meetings with the local 20 media and certainly, you know, we encourage the local 21 officers to be open and transparent and to build those 22 relationships with the local media, so that is something 23 that we'd want to continue, I think. What we have, and 24 it's set out in our guidance, is that if the Inquiry is 25 at corporate or policy level, then we would expect that,</p> <p style="text-align: center;">Page 71</p>
<p>1 I think, as I said before, our relationships with the 2 local and regional media are very close, we deal with 3 them on a day-to-day basis. We have, I think, 4 relationships of trust and confidence and mutual 5 understanding. We know each other's sort of objectives. 6 I think it's different with the national media 7 because it is so infrequent, it is when we get 8 particular news events, and as a result of which, 9 I think, that's why our focus has been more on the local 10 and the regional media, and also, you know, like us, 11 they have a big sort of responsibility for the 12 communities they serve. That's where their information 13 comes from, that's where their revenues come from, and 14 certainly we have those joint objectives in terms of 15 serving communities. 16 Q. I've been asked by one core participant to put to you 17 this point, so I invite your reaction to it: do you 18 think any steps could be taken by the national media, 19 perhaps enforced by a regulator, to improve their 20 relationship with communications departments such as 21 yours? 22 MR FEGAN: I think that's a very difficult question to 23 answer, Mr Jay. Certainly, as I've said before, our 24 experience is mainly with the local and the regional 25 media, less so than the national media, and perhaps the</p> <p style="text-align: center;">Page 70</p>	<p>1 quite rightly, I think, to come through the central 2 press office. 3 MR CUNNINGHAM: If I may add there, Mr Jay, I would be very 4 disappointed if we arrived at a position where all 5 enquiries from the press had to be funnelled through our 6 press office. I'm seeking a much more organic 7 relationship with the press, which allows officers who 8 are closest to the issues to be able to speak to the 9 press about what those issues are and what we're doing 10 about them. It's part of our accountability. 11 LORD JUSTICE LEVESON: But what do you say about -- not 12 a report back, but a note back that there had been such 13 contact? 14 MR CUNNINGHAM: Yes, I think that's absolutely right and 15 appropriate. I think again proportionate. A local 16 officer speaking to a local journalist about a very 17 local issue, a simple record of the fact that that took 18 place in the officer's notebook would absolutely 19 suffice. If it was something more significant, then 20 clearly that record would have to be more complete. 21 LORD JUSTICE LEVESON: What do you think about the 22 suggestion that that would chill the relationship, 23 because police officers wouldn't speak to journalists? 24 MR CUNNINGHAM: I don't accept that that would be the case. 25 Provided it were done in a way which officers recognised</p> <p style="text-align: center;">Page 72</p>

<p>1 we're not -- what we're not asking for. What we don't 2 want to happen here is the pendulum swing that one of 3 your previous witnesses has spoken about. This is about 4 a measured professional response to another professional 5 agency through the press and how we deal with that ought 6 to be a matter of record. I don't see any difficulty 7 with that.</p> <p>8 MR FEGAN: Can I add, sir, we actually record centrally that 9 contact anyway, so this is really just an extension of 10 that.</p> <p>11 LORD JUSTICE LEVESON: Thank you.</p> <p>12 MR JAY: On the issue of hospitality, Mr Cunningham, you've 13 spoken about this already through your ACPO role, 14 wearing your ACPO hat, so it's unsurprising we see 15 similar philosophy running through the way you don't 16 accept hospitality as Chief Constable of the Stafford 17 Police. You tell us at 02397 -- there's really very 18 little of interest. There's one lunch of approximately 19 £20, you tell us, meeting the editor of the 20 Staffordshire Newsletter on 16 April 2010 at a hotel in 21 Stafford: that's it?</p> <p>22 MR CUNNINGHAM: Yes, that's it. That was some months after 23 I'd arrived and the editor was having lunch with 24 a regional manager from the newspaper group and invited 25 me down to meet the regional manager for a getting to</p> <p style="text-align: center;">Page 73</p>	<p>1 or running the system will pick it up and do the 2 appropriate, is that the idea?</p> <p>3 MR CUNNINGHAM: Correct. It's an electronic whistle-blowing 4 system as opposed to the confidential telephone system.</p> <p>5 Q. Is this being run out through police forces up and down 6 the country, as far as you're aware?</p> <p>7 MR CUNNINGHAM: Yes, a number of forces are picking this up. 8 We certainly weren't the first.</p> <p>9 LORD JUSTICE LEVESON: Far be it from me to ask a question 10 which might have a very simple answer, but it just 11 struck me that there could be a mismatch between these 12 two systems. It's obvious that you will want through 13 your Bad Apple system confidentially to get information.</p> <p>14 MR CUNNINGHAM: Yes.</p> <p>15 LORD JUSTICE LEVESON: You're way ahead of me.</p> <p>16 MR CUNNINGHAM: I can see -- I know exactly the point you're 17 making. The audit system is used in investigation 18 purposes, and what we try and do is give staff the 19 confidence to report through the Bad Apple system, 20 recognising that we will not be tracing that back 21 through audits, but I do recognise the point you're 22 making, sir.</p> <p>23 LORD JUSTICE LEVESON: Thank you.</p> <p>24 MR JAY: I think the last point, Mr Cunningham, Mr Fegan may 25 have a view about this as well, the use of social media.</p> <p style="text-align: center;">Page 75</p>
<p>1 know me kind of event, and I accepted.</p> <p>2 Q. Your force policy on gifts, gratuities and hospitality, 3 tab 17, page 02401. It's a good and clear policy, but 4 I'm not going to refer to it, we've read it. It's under 5 our tab 17. It's certainly in line with the best 6 regional policies we've seen over the last few weeks.</p> <p>7 Can I ask you, Mr Cunningham, about the Bad Apple 8 system. I don't think we've had reference to this 9 before. It's question 58, page 02406.</p> <p>10 MR CUNNINGHAM: Yes.</p> <p>11 Q. It's quite a recent piece of software. What does it do?</p> <p>12 MR CUNNINGHAM: This isn't the software. We've a couple of 13 pieces of software that we use. One is in relation to 14 the auditing of systems, and that is a piece of software 15 that will audit every key stroke that officers make on 16 computers. That allows us, around the protection of 17 information, to provide a very complete audit system.</p> <p>18 The Bad Apple system is a facility which allows 19 officers to report electronically through our intranet 20 system any wrongdoing on the part of colleagues 21 anonymously. It's a system which allows officers to 22 report it without any trace back to their own email 23 account, as it were, so the officers can be confident 24 that they're passing that information anonymously.</p> <p>25 Q. If the information is received, then whoever is auditing</p> <p style="text-align: center;">Page 74</p>	<p>1 Your statement makes it clear, Mr Cunningham, this is of 2 increasing prevalence, Twitter and Facebook accounts.</p> <p>3 As a matter of principle, I think you believe it's 4 probably a good thing, but are there any problems with 5 it?</p> <p>6 MR CUNNINGHAM: Yes. Social networking provides the service 7 with some fantastic opportunities to communicate 8 directly, swiftly, give accurate information to the 9 public on a 24-7 basis that we've never had before. It 10 also provides us with a reach that we have never 11 previously had, and so the opportunities are huge.</p> <p>12 There are risks. There are risks around on and off duty 13 conduct, officers misbehaving, of officers putting 14 inappropriate comments on the system. There's risks 15 also that were identified through the Serious Organised 16 Crime Agency strategic assessment of officers 17 identifying themselves as police officers and then maybe 18 being the subject of corruptors trying to befriend them 19 and the like.</p> <p>20 So those risks are out there, but what we should do 21 is my firm belief is that we should mitigate those risks 22 rather than stand in front of the -- Canute like in 23 front of the waves of social networking. It's there, 24 it's with us, and we need to manage it effectively.</p> <p>25 MR JAY: Thank you. A nice image with which to end your</p> <p style="text-align: center;">Page 76</p>

<p>1 evidence, Mr Cunningham. Do you have a view on this, 2 Mr Fegan?</p> <p>3 MR FEGAN: Yes, I think it's a fantastic opportunity for the 4 service, it makes us more open and transparent. Within 5 Staffordshire we now have 55,000 people following us on 6 social media sites, and of course this is improving 7 direct engagement with communities. The media follow 8 us. So it makes us more responsive as a service as well 9 as being open and transparent.</p> <p>10 MR JAY: Those are all the questions I had for you. Is 11 there anything you wish to add, either of you, to your 12 evidence? Obviously the rest of your statements will be 13 taken as read.</p> <p>14 MR CUNNINGHAM: Just to repeat the point for me, Mr Jay, if 15 I may, that ACPO is responding confidently and openly to 16 the HMIC "Without fear or favour" recommendations and to 17 what was contained within the Filkin report, and we will 18 do likewise as this Inquiry concludes as well. We want 19 to make sure that we take the recommendations of people 20 who are scrutinising our activities very seriously and 21 building them in to the guidance that we're developing 22 so that that guidance actually gets grease to the 23 squeak, as it were, and we're able to respond 24 effectively and quickly.</p> <p>25 LORD JUSTICE LEVESON: I'm very grateful for that, but Page 77</p>	
<p>1 I repeat, because it's very important, not just for the 2 police but in relation to all other persons or bodies 3 affected by this Inquiry, that they shouldn't feel it 4 necessary to wait for me. The very fact of the public 5 discussion of these issues has struck me over the months 6 as itself being an extremely important vehicle whereby 7 those who are charged with making decisions can get 8 a sense of what is happening and the perception of what 9 is happening in a way that doesn't require me then to 10 write it all down, although I will, but is itself a very 11 great deal of the positive impact, at least I hope it's 12 a positive impact, of the fact of this Inquiry.</p> <p>13 MR CUNNINGHAM: Yes. Thank you.</p> <p>14 LORD JUSTICE LEVESON: Thank you very much indeed. Thank 15 you both very much for coming. 10 o'clock on Monday. 16 It is next Wednesday, is it, Mr Jay, that we are 17 starting early?</p> <p>18 MR JAY: It is, indeed. 9.15.</p> <p>19 LORD JUSTICE LEVESON: I give notice that on Wednesday next 20 we shall start at 9.15, because a witness will be giving 21 evidence on a video-link and that's the time that we 22 have to do it. Thank you very much indeed. 23 (4.15 pm) 24 (The hearing adjourned until 10 o'clock on Monday, 2 April 25 2012)</p> <p>Page 78</p>	

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