The Leveson Inquiry

STATEMENT OF IAN HISLOP

1. I have been Editor of *Private Eye* since 1986. I have been asked to provide a statement, dealing with six points. I set out my response to those points below.

2. I have recently given evidence to four Parliamentary Committees:
   (1) House of Commons Select Committee on Culture, Media and Sport, on 5 May 2009, as part of its inquiry into "Libel, Privacy and Press standards" ("DCMS");
   (2) Joint Committee on the Defamation Bill, on 11 July 2011 ("JCDB");
   (3) House of Lords Select Committee on Communications, on 11 October 2011, as part of its Inquiry into the Future of Investigative Journalism ("SCC"); and
   (4) Joint Committee on Privacy and Injunctions, on 31 October 2011 ("JCPI").

   My evidence to these Committees is available on Parliament's website. In (1), (3) and (4), Alan Rusbridger, Editor of The Guardian, gave evidence at the same time I did; on (4) there were also two other witnesses. I have not included copies of the evidence with this statement and, where I refer to it, I do so by reference to the question number ("Q"), preceded by "DCMS", "JCDB", "SCC" or "JCPI", respectively.

(1) My experience and/or knowledge of the practices employed by the press (both popular and broadsheet) over the last 10 years in obtaining stories or "scoops". The Inquiry is interested in both the positive as well as negative practices and the reasons for adopting each in your opinion.

3. I have no direct experience or knowledge of the practices employed by the tabloid or broadsheet press over the last 10 years.

4. *Private Eye* has reported on the press for many years. The "Street of Shame" column – its name dating back to when the national newspapers were mainly based in Fleet Street – appears in every issue of *Private Eye*. It contains stories about the press, taking up a page or more. Over the years, *Private Eye* has been critical of and/or uncomplimentary about journalists, editors and publications. In preparing this statement, I was reminded that in the early 1980s, it was *Private Eye* that revealed that large cash payments were being offered by newspapers to witnesses who were to give evidence in the criminal trial of Peter Sutcliffe; considerable public concern followed, leading to a Press Council (as it then was) inquiry into the practice of

payments to witnesses: see Geoffrey Robertson "People against the Press: an enquiry into the Press Council" (1983, Quartet Books), p72. *Private Eye's* observation of press practices has continued since then. More recently, *Private Eye* has reported on the phone hacking story, as it has unfolded.

(2) What allowed the allegedly unlawful or improper practices of the press to go unchecked internally to news rooms and externally by regulators and other agencies?

5. Again, this is a matter on which I have no direct knowledge or experience. For the record, I have not authorised any phone hacking by anyone working at or for *Private Eye* and I am not aware of any phone hacking having been carried out for the purposes of a *Private Eye* story or proposed story. I do not believe that any allegation has been made about *Private Eye* in relation to phone hacking.

6. The question concerns practices which are unlawful (that is, in breach of existing civil and/or criminal law) and/or improper (that is, in breach of the PCC Editors' Code and/or other applicable guidance). Since it has not been suggested that those (allegedly) concerned were ignorant of the relevant law or code, I comment on each of those mentioned as follows:

(1) "**news rooms**": there must have been (at best) a failure on the part of those who should have exercised proper editorial control to do so. The fact that News International had become so big and powerful seems likely to have been a factor: it seems to have acted as if the law did not apply to it. The relationships between News International and the Government and between News International and the police are matters which are, I understand, to be considered by your Inquiry. I have no direct knowledge about this.

(2) "**regulators**": I refer below to the Press Complaints Commission ("PCC"). The PCC did not carry out a thorough or effective investigation into allegations of press misconduct. I understand from what others have said that while the PCC has dealt with specific complaints, it has not been acting as a press "regulator": see Alan Rusbridger's answers at DCMS Q892 and JCPI Q192, Q199.

As to other regulators, I am aware of the Reports "What Price Privacy?" and "What Price Privacy Now?" published by the Information Commissioner ("ICO") in 2006. The ICO reported on "Operation Motorman", an investigation which had identified 305 journalists as customers "driving" the "unlawful trade in confidential personal information". In the second report, the ICO identified a number of

publications, including national newspapers, involved: *Private Eye* did not appear in the list. The ICO was seeking to stop that unlawful trade. I am aware that an amendment was passed to increase the penalty which could be imposed on criminal conviction for breach of s55 of the Data Protection Act 1998 (as well as to add a wider "public interest" defence to a criminal charge); so far as I am aware, that has not been brought into force. I do not know what further action the ICO took, or could have taken, subsequently.

(3) "**other agencies**": the police is the most important agency to consider. The failure of the police to investigate or take action is a matter which is the subject of your Inquiry, but upon which I cannot shed any light.

(3) The role of the PCC in regulating the press and your views on its failings and strengths. We would be interested here in the reason for *Private Eye* deciding not to come within its jurisdiction.

7. As Editor, I am responsible for what is being published in *Private Eye*. I take that responsibility seriously. I believe that the role of *Private Eye* - leaving aside the jokes – is to inform the reader and to publish facts that are accurate. *Private Eye* would publish genuinely private or confidential information only if I was satisfied that there was sufficient public interest in the story for it to be published. I think carefully about what is to be published: where necessary, discussing and considering it carefully with others, including the journalists concerned and our lawyers. What is required depends on the nature of the story: it may include careful consideration of where the information came from, how it had been obtained and the reliability and authority of the source.

8. *Private Eye* is subject to the law. There is, as your Inquiry is aware, a wide range of laws, both common law and statute, which apply to anyone publishing information. The courts can award an injunction and/or damages and/or costs (which can be very large sums) for civil claims made for libel or for misuse of private information/breach of confidence. Similar remedies can be given for breach of the Data Protection Act 1998 ("DPA") (which protects personal data) or the Protection from Harassment Act 1997 ("PHA"). Both the DPA and the PHA also create criminal offences. There are numerous other criminal statutes creating offences that can be committed by publishers or journalists, arising out of what they publish (or seek to publish) and/or the methods used to obtain information. In addition, the rules relating to contempt of court restrict some reporting and there are severe penalties for breach.

9. *Private Eye* is not subject to the PCC and does not have its own written "editorial guidelines" or code of conduct. I have re-read the PCC's "Editors' Code" for the purposes of making this statement. While I have no problem with its contents, I do not believe that *Private Eye* needs that Code – or to be policed by the PCC – in order to work out what editorial standards are appropriate or to ensure that those standards are applied.

10. No matter how much care is taken, it is inevitable that mistakes will sometimes be made. When a complaint is made to *Private Eye*, we try to deal with it as quickly and effectively as we can. Some complaints to *Private Eye* can be easily resolved: for example, a recent complainant was happy to have a letter published as the first item in the letters page. Others are not capable of being resolved and result in legal proceedings, which either go to court or settle on the way. I outlined the position in relation in my written evidence to the DCMS (published at the end of the questions):

> "I have looked at what happened in 40 cases since the beginning of 2000 involving libel claims made against *Private Eye*. For the avoidance of doubt the making of these claims did not necessarily lead to court action being started, as some were settled without any need to institute court action and others were not pursued. One action went to trial—the Condliffe action which was mentioned during my evidence—and resulted in victory for *Private Eye* when the action was abandoned after some six weeks of trial. One action went to trial and resulted in a hung jury. One action was settled on the eve of trial with a substantial payment of costs in the *Eye's* favour, in other words a victory for the *Eye*. Of the remainder, 26 claims were not pursued and 11 resulted in agreed settlement."

11. I do not see that it would assist *Private Eye* in dealing with complaints to be subject to the PCC's jurisdiction. Where complaints can be resolved with the complainant (acting with or without lawyers), that can be done by communications directly with us. In such cases, there is no need for the PCC to act as intermediary or mediator. If we were to want an independent mediator in a particular case, there are many other available options. Where the complaint cannot be resolved by agreement, but needs to be determined – particularly if there is a significant dispute about the facts – then this is something that is best done by the courts. The PCC cannot investigate or determine factual disputes.

12. Most importantly, I do not believe that the PCC would be an independent and impartial tribunal for determining complaints against *Private Eye*. I have referred above to the fact that for decades *Private Eye* has reported on, and been critical of, the press. *Private Eye* has been very critical of individuals who are, or were at the

relevant time, board members of the PCC, as well as of newspapers, whose representatives sit on the PCC. I refer to DCMS Q889-890 and my answer to Q890:

> "We do not pay and *Private Eye* does not belong to the PCC, no. I have always felt *Private Eye* should be out of that. It means that we just obey or do not obey or we are judged by the law rather than by the PCC. Practically two and a bit pages per issue of *Private Eye* are criticism of other individuals working in journalism. On the whole, they appear on the board of the PCC adjudicating your complaint, so I would be lying if I said that did not occur to me. So no, I always thought it would be better for the *Eye* to be out of it."

I also refer to my answers at JCDB Q726-727, which includes this at Q726:

> "..the record of the PCC recently—well, for quite a long time—is that it has been ineffective, toothless and often wrong. The PCC are the people who censured the *Guardian* for running the phone-hacking story, so you can see why some of us feel that their judgment has not been awfully hot in the past few years. I do not belong because it is a supposedly self-regulatory body that had a very strong tabloid and News International influence for many years. Therefore, I felt that to go before it and to offer myself to its judgment was not something that I wanted to do. We run a column every week called Street of Shame. I would rather comment about them. So that was my position. I know that the Prime Minister has rather jumped the gun in saying that it is all over, but I think that there would have to be a fairly major rethink about who is on the PCC and what it does if you want to use it as a regulatory body."

13. It has not made sense for *Private Eye* to be part of the PCC. The PCC has lacked independence from the newspaper industry. We have not needed it, either to set editorial standards or to help us resolve complaints. We would not have derived any benefit from being subject to its jurisdiction: it would not have protected *Private Eye* from costly or protracted legal proceedings, pursued by expensive lawyers on behalf of claimants.

14. When I gave evidence to the DCMS, I heard what Alan Rusbridger said about the role and functioning of the PCC: see DCMS Q891-895 and, when asked whether I would find a changed PCC "acceptable", I said at DCMS Q896 that if its structure and the means of redress offered were different, I would

> "think very seriously about joining again, because that would make sense."

That is and was my position. Issues of independence and effectiveness would need to be addressed. If it made sense for *Private Eye* to participate in a voluntary system of regulation, it would do so. However, as I said in JCDB Q727:

> "...if you are going to come up with a regulatory body, it has to be very different from what the PCC has been before."

15. Since *Private Eye* has not been subject to its jurisdiction, I doubt it would assist your Inquiry for me to say anything more about my views about the PCC's "failings or strengths". The PCC's success or failure has not been affected by the fact that *Private Eye* has not participated in it.

(4) How should the press be regulated in the future?

16. I am aware that you have encouraged the media to discuss the issues relating to regulation, to see if a "sensible way forward" can be devised: Inquiry transcript Monday 14 November 2011, **1/4/14 – 1/5/7**. In my view, the first step would be for the national newspapers (broadsheet and tabloid) to engage in that process – together with local and regional newspaper titles – in short, all those who are (or who were until their recent decision to leave) subject to the PCC. I know that Alan Rusbridger has made various suggestions for a new form of PCC – such as a "PCC plus" or PCC with "mediation" in its title: see JCPI Q192, Q199; his Orwell Lecture and his opening statement to your Inquiry. If a form of voluntary self-regulation is to be contemplated, then it would have to be one to which the major newspaper publishers would be willing to subscribe and, therefore, it is for them to take the initiative. I would be happy to consider, with interest, any proposals they put forward.

17. I believe that statutory regulation of the press is undesirable as a matter of principle. As I have said, there are already ample – more than ample – legal restrictions which apply to the press in relation to what can be published or what means of obtaining information can be used. It is important that any civil or criminal restrictions should take into account, and protect, freedom of expression (which includes the right to receive, as well as the right to communicate, information and ideas). I refer to paragraph 8 above and 22 below. So far as complaints are concerned, one option could be to consider whether the courts could offer a faster, more effective and cheaper route to resolving disputes.

18. If there is to be a new press regulator (whether voluntary or statutory), with the power to adjudicate on complaints, then it must be independent, impartial and effective. One important question is whether adjudication by such a regulator would be *instead of* (rather than as well as) adjudication through the court process. The courts can – or should be able to – offer a means of resolving disputes that is fast, fair and effective

and that is reasonably priced. Reforms to the substantive law or procedure in relation to legal claims against the press fall outside your Inquiry (as I understand it). However, if the press are to be made subject to a new form of regulator (particularly if it has power to impose sanctions), then there should be a corresponding protection from additional court sanctions. Of course, if involvement in a self-regulatory system would protect the publisher from court proceedings, that would be an incentive to publishers to wish to be involved.

(5) How do we ensure investigative journalism in the public interest is protected in the future?

19. I have described "investigative journalism" as "finding out things that people do not want to tell you" and said that it is much harder and much more expensive than other forms of reporting, such as "reportage" (reporting courts, inquiries, ongoing disputes etc) or features: see SCC Q38. As I said then, many of the best stories in *Private Eye* come from readers, though the preparation of a story for publication can involve great determination and effort ("doggedness"), as well as the ability to spot connections, and the knowledge and experience to be able to recognise, and report on, the real story: see SCC Q40-42.

20. *Private Eye* has a long and proud tradition of investigative journalism, including the outstanding contributions from (the late) Paul Foot; the annual "Paul Foot awards" acknowledge the invaluable work that is done through serious journalism. Investigative journalism takes time and costs money, though does not necessarily sell newspapers: see SCC Q50-51. Though, of course, generally speaking, printing the truth sells newspapers and a big story can result in increased circulation, as demonstrated strikingly by the Telegraph's stories about MPs' expenses: see JCPI Q176.

21. The main challenge – outside the scope of your Inquiry – to investigative journalism results from the current economic climate. There are undoubtedly huge financial pressures on the print media generally, including *Private Eye*. I am aware that local newspapers face additional problems in relation to investigative stories: they fear that they will lose vital advertising revenue, if they publish stories critical of local authorities or other bodies: DCMS Q910-912. Further, in some areas, local authorities publish their own freesheets which compete with, and threaten the existence of, local newspapers which charge a cover price.

22. The following points are a non-exhaustive list of issues relating to the protection of investigative journalism in the public interest:

(a) A broad and workable definition of the "public interest"

22.1 The "public interest" must be broad in scope. There should be a practical and effective "public interest" defence in relation to all civil claims and criminal offences which can be used against the press. In order to obtain a story of real public interest, it may be necessary to use subterfuge and/or to record people without their prior knowledge or consent: one recent example of this (though not a *Private Eye* story) is reporters posing as lobbyists and recording members of the House of Lord and House of Commons who were willing to offer services for money, in breach of the relevant rules. It should be clear to all concerned – the publisher and potential complainant or prosecutor – that the public interest defence would cover the story and the means used to obtain it: see SCC Q72-Q74. Of course, a "public interest" defence would not protect hacking into the phones of victims of crime or relatives of those killed in a terrorist act or on active service.

22.2 The courts will, in the end, determine whether or not a public interest defence applies. But they should do so on the basis that protection is offered to matters which can reasonably be considered to be in the public interest. It would be a mistake to proceed on the basis that, when considering the right to respect for private life (which now is interpreted as encompassing the protection of reputation) and the right to freedom of expression, there is a single right answer on where the line is to be drawn. Reasonable people may, reasonably, take different views: for example, whether a particular fact or detail, a photograph, or a quotation from, or copy of, a document should be included – perhaps, in some cases, they may reasonably differ about whether the subject-matter falls within the scope of the public interest at all. Judges, by reason of their professional background and training, may be more inclined to prevent publication than to allow it; editors, conversely, may be more inclined towards publication. An editor contemplating publication – or contemplating authorising the use of subterfuge or secret recording – should not be expected to anticipate what view of the "public interest" an unknown judge would take. To have to anticipate the narrowest view that could be taken by a judge would result in an unduly restrictive approach. An editor should be able to proceed on the basis of a reasonable evaluation of the

circumstances, taking account, of course, of the rights of those who will be affected by publication.

22.3 There needs to be clear and effective recognition that if the judgment of the editor falls within the "range of permissible editorial judgments" (as one judge, Tugendhat J, recently stated) – that is, if it is within a range of reasonable judgments that can (reasonably) be made – the courts will respect that judgment. I understand that there are relevant cases, both in this jurisdiction and in Strasbourg in relation to editorial discretion and the role of the judges (who are not, and who should not seek to act as, editors). These are matters, really, for the lawyers rather than for me. But the law affects non-lawyers. There must be a "practical and effective" public interest defence, if the right to receive, and to communicate, information is to be fostered.

22.4 There will, of course, be cases which are clearly not of any public interest – or where it is clear that what is published, or what was done, fell outside the public interest "range". However, where cases are within the reasonable (or permissible) margins, the publisher should have – and should be able to work in the knowledge that it will have - a good defence.

22.5 There is another aspect to this: it seems to me, as I said at JCDB Q683, that there are problems with judging a case on the basis of the behaviour of the journalist, rather than what has been printed:

> "I would prefer to see the debate saying, "You have said this. How damaging is that? Is it true?" rather than, "Did you ring up twice or three times? How often did you put this to him? Did you take enough care?""

Particularly where a complainant seeks to prevent the publication of information, or to have a public statement made after information has been published, the court should require evidence from the complainant (including the production of appropriate documents) so that it can judge where the public interest lies with full knowledge of the facts.

22.6 In terms of defining the "public interest", I do not believe that a comprehensive definition can be achieved, though useful guidance could be given by statute or in codes. The PCC Editors' Code acknowledges that there is a public interest in freedom of expression itself and identifies three strands:

"i) Detecting or exposing crime or serious impropriety.

ii) Protecting public health and safety.

iii) Preventing the public from being misled by an action or statement of an individual or organisation."

The Ofcom Broadcasting Code, section 8.1, gives the following as "examples" of what the "public interest" includes:

> "Those revealing or detecting crime, protecting public health or safety, exposing misleading claims made by individuals or organisations or disclosing incompetence that affects the public."

The "public interest" should include all of the above.

22.7 Finally on the "public interest": in my view it is wrong to suggest that there can never be a public interest in a person's sexual relationship. It all depends on the circumstances: such a relationship may influence how that person behaves - how contracts are awarded, or how promotions made - or affect a person's judgement: see SCC Q53. There is an obvious difference between the paparazzi seeking to take photographs inside a celebrity's bedroom and journalists seeking to establish where money (especially public funds) has gone: see DCMS Q887-Q888; and see also DCMS Q897, Q900-Q901; and Q909.

(b) Reform of libel law – substantive law and procedure

22.8 There have been important changes in the law of libel that have lessened its "chilling effect" - for example, imposing some order and control on jury awards of damages and depriving public bodies of the right to sue for defamation: see DCMS Q908. However, further reform of both the substantive law and procedure is needed. The Defamation Bill is before Parliament now; the Joint Committee which considered that Bill (to which I gave evidence in July 2011) has produced its Report. I would be happy to say more about these issues, but understand that they fall outside the scope of your Inquiry.

(c) Privacy law and injunctions

22.9 Until the recent decision of the courts in the *John Terry* case (and subsequent decisions, which I am told, include the Court of Appeal decisions in *JIH, Ntuli v Donald* and *Hutcheson v News Group*) and the Report of Lord Neuberger's Committee on "superinjunctions", there had been a serious problem in relation to the grant of injunctions to prevent publication. No formal data were

collected about injunctions and there was considerable concern that injunctions were being granted too readily, without proper regard to the relevant principles, including open justice, and then served on third parties (including, sometimes, *Private Eye*): see DCMS Q878-882. The situation appears to have improved, since *Terry* and the Neuberger Report. Since August 2011, the Ministry of Justice is to collect data about applications for, and the grant or refusal of, injunctions to prevent publication: see JCPI Q188. This will enable there to be some scrutiny of how section 12 of the Human Rights Act 1998 is working. There is real concern as to whether there is sufficient weight given to freedom of expression in the face of a privacy claim and whether section 12 is working effectively: see DCMS Q875.

22.10 I have referred to the need for a broad public interest defence to a "privacy" or breach of confidence claim. In addition, it is important that there should be a real "threshold of seriousness" before the court will entertain a complaint. The court should consider what it is being asked to protect and why. There are matters which are not worthy of being protected.

22.11 *Private Eye* was the subject of an injunction application in the *Napier* case: we sought to report a disciplinary finding, and an ombudsman report, on a complaint about the former head of the Law Society and his firm; the story had been brought to us by the successful complainant; when we asked Mr Napier for a comment, he applied for an injunction. Although the judge refused the application in January 2009, he granted a temporary injunction pending an appeal. Though that appeal was "expedited", it was not heard until March 2009 and the decision was given in May 2009. As a result, Mr Napier succeeded in preventing publication for several months, though he was not entitled to an injunction at all: see DCMS Q866.

22.12 The *Napier* case illustrates the practical effects of giving prior notice of publication. *Private Eye* was able to defend the claim, although it faced a very large risk in terms of costs, if it had lost the application (I am told by my lawyers that the total costs, of both sides, were in the region of £350,000); and even though we won and were awarded our costs, there was still a substantial shortfall which we had to pay. A publisher without the resources to challenge an injunction application would simply decide not to publish, because it was not worth it. As a result, information which ought to be published is suppressed. There is no legal requirement for prior-notification in

domestic law; the challenge to that position has been rejected in Strasbourg (in the *Max Mosley* case); and in my view it is very important that no such requirement should be introduced.

22.13 There is much to be said for "publish and be damned": DCMS Q867.

(d) Better protection for whistleblowers

22.14 Better protection is needed for "whistleblowers" who provide vital information about matters of public interest from within companies or public bodies. *Private Eye* has recently published a special supplement about the NHS, which revealed (amongst other matters) widespread use of "gagging clauses" to prevent doctors and nurses from revealing information which ought to have been published: see SCC Q85. The sources of stories need protection themselves. Of course, there is some protection for journalistic sources, but the recent heavy-handed attempt by the police to discover The Guardian's sources for its phone hacking stories illustrates that more protection is needed: though the application was withdrawn, the question is why it was thought appropriate to make it at all.

(e) Better access to information

22.15 The Freedom of Information Act 2000 ("FOIA") gives a right of access to information, but has many limitations on, and exemptions from, that right. It has become increasingly difficult to obtain information about the use of public funds, with "commercial confidence" being used to cloak information: see SCC Q57, Q62-Q63.

22.16 The right to access to information is a critical part of the right to freedom of expression and vital for investigative journalists. The number and scope of the exemptions to FOIA needs careful review. To take as an example the MPs' expenses story, while there was a FOIA battle to obtain greater information (driven by Heather Brooke and others), it was an old-fashioned newspaper "scoop" that resulted in publication of the real story. The Telegraph paid an informant for confidential information, taken without permission. That was plainly justified in the public interest. Had the information been obtained

under FOIA, it is likely that personal data, such as home addresses, would have been redacted which would have meant, as a result, that the practice of "flipping" would not have come to light.

(f) The need to control – and to reduce – legal costs of litigation

22.17 Mistakes can and do happen, despite the best endeavours of well-intentioned and experienced journalists and publishers. There should be a means of resolving matters after a mistake has been made that does not involve massive and disproportionate costs.

22.18 To take an example, *Private Eye* reported on the tax avoidance schemes used by Tesco; in its reporting about the same issues, The Guardian made an error and, as a result, faced litigation which was pursued in a very aggressive manner. The costs bill was in the region of £1m: see DCMS Q858-860. Tesco did not sue *Private Eye*, although we would have faced a similar costs bill if we had made an error in our reporting. When *Private Eye* was sued by a Cornish accountant, Stuart Condliffe, over articles which exposed and criticised bills he had submitted, *Private Eye* was successful in the litigation – Mr Condliffe had pursued the litigation over several years, but "discontinued" his claim at trial after six weeks in court - but we were left with a large costs bill after the claimant became a bankrupt: see DCMS Q861-862 (Q862 should say that the "*claimant* went bust", not the "defendant").

22.19 It is vital to address the costs of litigation, whether for libel or misuse of private information/breach of confidence. The risk of costs has a real "chilling effect": see JCDB ~~Q676~~ 671 672 -Q~~677~~. There should be speedy and effective means of disposing of claims, including better scope for early resolution and case management. The costs of a making a mistake should not be prohibitive; otherwise, as Alan Rusbridger said, we run the risk that some matters will be regarded as being "too risky" to write about at all: see DCMS Q864 and Q874. The loss is to the public, in the end, because it does not receive the information which it has a right to receive.

(6) We would also be interested in hearing your views on the role of the police and politicians in their interaction with the press.

23. The fundamental principle is that relations between the police and the press – or politicians and the press – should be honest, independent and transparent. Police officers and politicians should seek to serve the public interest. It is obvious, and should not need stating, that the police should not seek or accept payments from the media for information. This is already covered, I believe, by the criminal law. I understand, from *Private Eye's* lawyers, that Paragraph 1 of the "Standards of Professional Behaviour" for police officers, set out as a schedule to the Police (Conduct) Regulations 2008, states:-

> "Police officers are honest, act with integrity and do not compromise or abuse their position."

This was not an innovation: the equivalent paragraph in the Code of Conduct that was a schedule to the 2004 Regulations, was headed "honesty and integrity" and said:

> "1. It is of paramount importance that the public has faith in the honesty and integrity of police officers. Officers should therefore be open and truthful in their dealings; avoid being improperly beholden to any person or institution; and discharge their duties with integrity."

It seems obvious that police officers should not expect or accept cash or benefits in kind (such as lavish hospitality) from the press. Interaction with the press should be at arms' length. There should be no corruption or conflict of interests.

I believe that the facts stated in this statement are true.

Signed:

Ian Hislop

Date: 16th January 2012