



Media Relations and Integrity Policy (1125/2023)

Abstract

This policy sets Sussex Police's approach to media relations; including overarching purpose and principles, assessment and prioritisation of reputational issues, integrity in interaction with media representatives, recording interaction and information released and facilitating media activity.

Policy

1. Introduction

1.1 This policy outlines Sussex Police's approach to media relations. It incorporates recommendations from His Majesty's Inspectorate of Constabulary and Fire and Rescue Services (HMICFRS) on police integrity and meets or exceeds national best practice and guidance set by the National Police Chiefs' Council (NPCC) Communications Advisory Group and Authorised Professional Practice (APP).

This will ensure all media relations activity, whether conducted by Media and Communications Department (M&CD) or others in the Force, is carried out consistently and for a legitimate purpose in line with the Standards of Professional Behaviour and Code of Ethics, adheres to national best practice and demonstrates openness and integrity.

1.2 A presumption should not be made that the media is the most effective way to achieve your communications goal or engage the public. Speak to a member of M&CD staff to discuss your needs.

2. Scope

2.1 This policy and procedure cover all aspects of media relations activity and interaction including the model used to assess issues and underpin a consistent approach to media relations, integrity in interactions with media representatives, the process for recording, categorising and releasing information to the media, how to facilitate different kinds of media interaction and media training.

3. Policy Statement

3.1 Sussex Police is committed to transparency and openness among its workforce and encourages proactive communications with external and internal groups and individuals in line with the Standards of Professional Behaviour and Code of Ethics. Our leaders and workforce should be empowered to use their discretion to communicate with others in order to:

- Support the achievement of Force objectives
- Enhance the effectiveness of operational activity

- Foster positive relationships with others
- Build public confidence in line with the Standards of Professional Behaviour and Code of Ethics
- Demonstrate openness and integrity and build the trust and confidence of the public.

Procedure

1. Effective Communication

1.1 Anyone in the Force has the discretion to speak to media representatives if there is a legitimate purpose for that contact and if they follow in full the procedures outlined in this policy. However, it should be remembered that the media and the public do not readily distinguish between personal views and formal communications from Sussex Police, even if they are clearly presented as personal. All members of Sussex Police, therefore, as ambassadors for Sussex Police, have a role to play in ensuring we communicate consistently and represent the Force in line with the Standards of Professional Behaviour and Code of Ethics, APP and this policy; whether in media activity, on social media or in other public interactions.

1.2 All proactive media relations activity must be carried out for a legitimate purpose and demonstrate the Standards of Professional Behaviour and Code of Ethics. We will strongly defend the Force if we are unfairly criticised. If we make mistakes, we will explain where we have fallen short of the Standards of Professional Behaviour and Code of Ethics. This includes media relations activity that is supporting operational matters. Lessons learned are debriefed and implemented via appropriate internal mechanisms.

2. Principles and Application

2.1 The media relations approach for a specific issue or incident will be set by this policy and supporting M&CD documents.

2.2 Any activity in the public domain is a potential and legitimate source of media interest. The principles of this policy must be applied to all external communications, particularly on social media, not just when liaising directly with media representatives.

2.3 In line with Information Access legislation and our openness principle, a presumption should be made that any document marked official (or deemed marked official by virtue of not being marked) would be disclosed to the media, proactively if it is of existing public interest, or on demand if requested.

3. Issue Prioritisation and Engagement with M&CD

3.1 Sussex Police focuses its communications in relation to the Force priorities;

- Protecting our communities
- Catching criminals
- Delivering an outstanding service to victims, witnesses and the public

M&CD manages reputational risks and opportunities by an assessment of the impact an issue or incident will have on public confidence in line with the Standards of Professional Behaviour and Code of Ethics, not a subjective test of whether a story is positive or negative about the Force or individuals within the Force.

3.2 The role of the Media Officer (MO) is to act as professional lead for media relations practice across the Force and to directly oversee the handling of public confidence, where their involvement will make a difference to the likelihood of communications providing operational or business benefits.

3.3 Usual operating hours for the MO Newsdesk internally are 7am to 6pm, Monday to Friday and 8am to 6pm Saturday and Sunday. The Newsdesk is available to media externally 7.30am to 5.30pm Monday to Friday; and 9am to 3pm on Saturday and Sunday. A call-out function exists outside of these hours via Oscar1 in the Force Contact, Command and Control Department (FCCCD).

3.4 The Media Officer has responsibility to handle all channels and audiences when managing an issue, including (but not limited to) updates to staff and social media interaction. A Media Officer will be assigned as the SPoC for the business lead and coordinate support from other M&CD colleagues as outlined below.

3.5 The level of Media Officer support to an incident or issue will be based on the Traffic Light System available as an interactive guide on the M&CD Intranet pages. It states that:

3.5.1 Red Issues (Highest Risk): Advice from the Media Officer must be sought as early as possible and before any media activity (including social media) is carried out - via the Newsdesk or FCCCD out-of-hours. A bespoke approach will be taken. If possible M&CD will provide a SPoC throughout the issue or incident.

3.5.2 Amber issues (Medium risk): Advice from the MO must be sought before any media activity is carried out. A bespoke approach may be required, but this will likely be the preparation of a press release or other discrete product rather than full communications plan. Out-of-hours, FCCCD should contact the on-call MO to discuss the approach.

3.5.3 Green issues (Lowest risk): Officers and staff are permitted to self-serve on green issues, which will normally be released on local social media channels only. Support will be provided by your local District Engagement Officer (DEO) or the MO in their absence. You may speak to the media provided you meet the criteria in 4.4 below and record the interaction.

3.6 If in doubt about the right traffic light rating that applies seek advice by sending an email, or if urgent go to Oscar1.

3.7 Media requests that are judged to be time critical outside normal Media Office hours are authorised by Oscar1 with reference to the traffic lights system for guidance on who should handle the issue. Where the criteria is met under the Traffic Lights System Oscar1 will contact the on call MO.

4. Openness and Transparency

4.1 All media relations activity is conducted openly, transparently and in the public interest. If compelling operational reasons mean we cannot release requested information or must delay releasing it, this will be explained to media representatives.

4.2 Openness includes when we make mistakes. We do not build long-term reputation or confidence by being evasive or reactive, but by recognising an organisation of our size will sometimes make mistakes and demonstrating the action we take to address them. This includes quickly correcting any inaccurate information inadvertently released to the media.

4.3 Always be open, approachable and helpful to media representatives; if you cannot give them information under the terms of this policy and procedures, direct them to a colleague who owns the issue or M&CD.

4.4 Police officers and police staff can give an interview or statement to the media provided it is for legitimate reasons (as per policy 5.1), provided they:

- Have sufficient knowledge of the issue
- Are confident and competent in speaking to the media
- Have ownership of the issue or permission from the issue owner
- Have made an assessment of risk as defined by the M&CD Traffic Light System and, in the case of red or amber issues, have sought prior advice from an MO
- Ensure the media team is aware the interview is taking place

4.5 Media representatives deserve an impartial and fair service. This means we do not show favouritism when dealing with media organisations and individuals.

However, fairness does not necessitate absolute equality. For example, it may be legitimate to limit the number of media representatives invited on an operational attachment and select them on the basis of the impact and reach their output will have on the target audience.

4.6 Fairness also means information about an 'exclusive' story that a journalist has self-sourced should not be released by police until after they have published their story; unless there are overriding operational needs to release the information earlier or media relations activity about the issue is already planned. In such cases, these reasons must be explained at the initial stage to manage the journalist's expectation.

5. Recording, Categorising and Releasing Information

5.1 All media interaction and information given to the media must be recorded for auditing and integrity purposes, to help manage multiple media requests and to avoid duplication of work.

5.2 Activity undertaken by M&CD will be directly recorded on the PRGloo system (media contact management system). Others must make a personal note of any activity - including when, where and who they spoke to, what information was given and what was the purpose. At the earliest opportunity, these details should be sent by email to add to PRGloo. Use of this system is mandatory and provides these key benefits:

5.2.1 Auditable: for disclosure purposes in investigative matters and to ensure integrity if our activity is questioned.

5.2.2 Single version of the truth: so we are all aware of and use the same information for public reassurance and confidence.

5.2.3 Demand management: releasing information to one media representative will lead to follow-up calls. If what is previously given is not recorded, we have to start again.

5.2.4 Avoids duplication: identifies people working on the same issue at the same time or multiple media enquiries coming from the same organisation.

5.3 Information to be released to the media must be classified using common definitions. These three factors will be specified:

5.3.1 Proactive vs. Reactive: In line with our openness principle, a proactive press release is the expectation where there is likely public interest or operational benefit, such as with a witness appeal. A reactive 'on demand' statement may be used for emerging incidents that are unclear or where resources are still being deployed to manage media attention, where investigative integrity could be compromised by proactive release or for matters that are personal in nature, such as suicide.

5.3.2 For publication vs. For guidance only: The expectation is that any information given will be for publication. If guidance is needed for a specific purpose, such as to ensure a journalist is aware of reporting restrictions or to ensure context is understood, it must be made clear that this is not for publication and agreed by the journalist not to be published before you disclose information.

5.3.3 Attributable vs. Non-attributable: It must be presumed that all information given is attributable to both Sussex Police and you as an individual. We provide qualified information and should not expect anonymity.

5.4 The terms 'on-the-record' and 'off-the-record' are commonly used, but not commonly defined and cause confusion as some people presume them to refer to either Guidance or Attribution. Sussex Police does not use these terms. If you are using these terms with others - particularly journalists - you must be certain to clarify shared understanding before disclosing information.

5.5 Information given to the media should be presumed to be for publication and attributable. If you require information to be given for guidance rather than to be reported or not to be attributable - which is only justifiable for very specific operational purposes, such as covert investigations - you must inform and seek advice from an MO before disclosing this information.

5.6 In addition to these considerations, Government Security Classification Policy requirements must be adhered to, in line with the Surrey Police and Sussex Police Information Security Policy (722)

6. Media Rights and Police Obligations

6.1 The media has a right to scrutinise the police and a responsibility to impartially inform the public about our actions and decisions. This contributes to the accountability of the police and the legitimacy of the British policing model based on consent.

6.2 Sussex Police similarly has an obligation to communicate with the public - both directly and via the media - to improve understanding of the Force, explain our actions and decisions, and to enhance operational activity; through witness appeals, crime prevention advice and other activities. This communication must be accurate, timely and relevant.

6.3 The police have a duty to safeguard the confidentiality of personal information, ensure the integrity of investigations or other operational matters and avoid prejudicing future legal action. Refer to Media Law and Rules for further information.

6.4 Sussex Police recognises and supports the media's role as in 6.1 at all times but retains an obligation to seek accuracy as in 6.2 and to challenge unethical or potentially prejudicial practices that could undermine our duty in 6.3.

7. Integrity in Media Relations Activity

7.1 Our media relations activity and interaction with journalists will exhibit the highest levels of integrity, which will be achieved if it is carried out in line with this document; particularly that it is carried out only for the purposes outlined in policy point 5.1.

7.2 The use of Force media resources - or self-generated media activity - for personal gain or exposure is prohibited and potentially a misconduct issue.

7.3 The disclosure of any information to the media for personal gain – financial or otherwise – is prohibited and could be considered as be misconduct / criminal.

Accessing information that is not for a lawful policing purpose could be considered to be misconduct / criminal.

Receiving payment for any information given to the media, operationally sensitive or otherwise, could be considered as misconduct / criminal.

7.4 All meetings with media representatives must be recorded personally and sent to M&CD as in procedure point 5.2. Any meetings or interviews with media representatives should be notified in advance (where possible) to the MO.

7.5 Any hospitality accepted or rejected from media, whether during meetings or elsewhere, must be reported to the Joint Force Vetting Unit (JFVU).

7.6 Sussex Police and its representatives must remain politically impartial at all times. This is particularly pertinent in the run up to and during election periods, which are covered by specific 'Purdah' guidance and the election of Police and Crime Commissioners (PCC), both of which are contained within the NPCC pre-election period guidance for staff and officers on contact with, and information provision to, PCC candidates and potential candidates'.

7.7 Personal relationships with media representatives - excluding but not limited to intimate relationships, co-habitation, family members, friends you socialise with, or membership of clubs and sports teams - must be disclosed and recorded under the Notifiable Associations Policy (Surrey and Sussex) (1176).

Relationships should also be proactively disclosed if you are asked to conduct media activity with that individual or encounter any other situation that could be perceived as a potential conflict of interest.

7.8 Individuals working for Sussex Police will sometimes hold personal views that differ from those of the Force.

7.8.1 There may be occasions when personal views will be legitimately shared with the media or the public, even if they differ from the Force's position. However, sharing views in a personal capacity does not excuse failing to exhibit the Standards of Professional Behaviour Code of Ethics, nor do they exclude individuals from the terms of this policy, Conditions of Employment. If in doubt, individuals must seek the advice of M&CD before sharing personal views on red or amber issues (as in Procedure point 3.5). All information given to the media - personal or formal - must be recorded as in 5.2.

7.8.2 Sussex Police recognises and respects that unions and staff associations - and the officers and staff representing them - have a formal role in publicly presenting the views of their members and that these may sometimes differ from the view of Sussex Police. In line with the Force's commitment to consult and be open with these groups - including proactively sharing information that will be released to the media on issues they are involved in - they are expected to honour the same principles and advise M&CD of planned media activity, so the Force can prepare and act if required.

8. Media Facilitation for Specific Situations

8.1 This document covers the principles to be employed for all media facilitation and is clear for the most common types of media interaction, namely by phone, email or face-to-face, including video conferencing facilities (e.g. Skype, Teams, Zoom, etc). This section highlights the approach for other specific situations:

8.1.1 Press conferences or briefings: These are generally only set up for red issues. They must be organised by the MO and be recorded by audio or video for disclosure purposes. A script and likely Q&As should be prepared in advance. Even conferences that are given as 'guidance only' (as in 5.3.2) must be recorded.

8.1.2 Incident scenes: Media who attend incident scenes should be provided a Rendezvous Point (RVP) with line-of-sight of the incident, wherever it is safe and appropriate to do so, outside of police cordons. They cannot be obstructed in recording material in public places, even on perceived taste and decency grounds. Information can be offered at the scene in line with 4.4, but any questions can be directed to the MO.

8.1.3 Major incidents (police or multi-agency): In the event of a major incident - multi-agency or Sussex Police only - a major incident model known as PIVOT will be deployed, which is scalable and dedicated to the incident. For a multi-agency major incident, an additional layer of communications coordination is activated. Thorough details of this approach are available in the Sussex Warning and Informing Group Major Incident Plan

8.1.4 Public place recording: The media and the public have an absolute right to photography, audio or video recording in public places, unless there is strong suspicion a specific offence is being committed. Please read Dealing with the Media on public place

photography and familiarise yourself with the national UK Press Card Guidance. All of these documents are in the Communications Guidance section of the Intranet.

9. Media Training

9.1 Anyone carrying out an interview in line with 4.4 should ideally have undertaken a specific media training course, be familiar with Radio and TV interview advice and/or have called the MO for ad-hoc support.

In conjunction with the Learning & Professional Development Department (L&PD), M&CD provides accredited input into a number of training programmes. Our approach is to equip people with the media - and wider communications and engagement - skills they require for different roles and at different points in their career. For a full overview of media training provision, read the modules outlined on L&PD's Intranet page. Our approach is either:

9.1.1 Role-based: The majority of our media training packages are designed specifically for the needs of different roles, particularly those likely to come into contact with media.

9.1.2 Rank-based: While all police officers and police staff have a responsibility to communicate effectively, it is recognised that media requirements and expectations placed upon individuals will differ based on rank or staff equivalent. As a result, we provide media training input at a range of levels.

9.1.3 Ad-hoc: In addition to formalised training, we can provide ad-hoc tips either over the phone or via Skype or Teams for an unexpected, urgent media interview or in-person at Force HQ (or by prior arrangement at another location) to help people prepare for an upcoming, planned media interaction.

9.2 The media training received by individuals at courses attended within the Force is recorded as part of the L&PD Focus meetings as well as on their SAP record. For ad-hoc training, officers and staff should contact CAT_HQ so that their SAP record can be updated. This allows us to check people carrying out media interaction have the required skills or receive ad-hoc advice.

Team: Media and Communications Department