



11 January 2018

Mr Piers Doggart
UCPI

By e-mail only: [REDACTED]

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Dear Piers

Response to UCPI Consultation on Anonymity on behalf of the Commissioner for the MPS

I write to provide the Commissioner's response to the UCPI consultation on proposed changes to the process for the publication of open versions of key anonymity applications and supporting evidence ("the consultation").

The MPS welcomes the proposals set out in the consultation as positive steps towards enhancing the efficiency of the anonymity process, whilst ensuring that those affected by the application are able to comment in the most meaningful way.

The MPS would add that, in addition to the time and effort expended by the Inquiry team in preparation of documents in support of anonymity applications, the process requires a great deal of work by officers in the MPS Inquiry Response Support Command and the Commissioner's legal team. To the extent that these efforts do not further their goal of assisting those affected by the application in being able to comment, the work is wasted.

The Inquiry team is familiar with the amount of work put into the preparation of these documents by the MPS under the current process, but for the benefit of others, it includes:


- Providing instructions on areas which require redaction and gisting. The instructions must be provided by staff with sufficient skills and expertise to identify areas of risk, and require close reading of all the evidence. Needless to say, this diverts staff with that expertise from carrying on other work.
- Legal advice or consultation on proposed redactions is required to ensure all are correctly sought and justified.

- The redactions must be implemented. A line-by-line redaction of the evidence is required in many cases. This is labour intensive and must be thoroughly checked to minimise the risk of error. It is time intensive work.
- The Inquiry is consulted on the proposed redactions. Various drafts are provided to assist this process, and a table explaining and justifying each redaction is prepared and provided. Members of legal and police teams are engaged in this process.
- Once the Inquiry has agreed the redactions, final drafts are prepared. Again, the need to minimise the risk of error and watermark and protect the final draft means this is rarely quick work.

This work is carried on a rolling basis, because each month a number of applications are submitted to and considered by the Inquiry.

For these reasons we endorse the proposals set out in the consultation, subject to one marker: we request that, whatever final process is adopted, it continues to include an opportunity for the MPS to seek redactions before publication in respect of any document in which the MPS 'has equity', or which relates to an MPS or former MPS officer, even where generated outside of the MPS (for example by the officer or any other person).

Yours sincerely



pp
Melanie Jones
Team Leader (Solicitor)