



**RECORD OF SECRET FILMING AND RECORDING PROPOSALS**  
**News and Current Affairs and Factual Programmes**

“Any proposal to carry out secret recording must be referred to Editorial Policy prior to approval by the relevant senior editorial figure in the division or, for independents, by the commissioning editor.

The gathering and broadcast of secretly recorded material is always a two-stage process, requiring a justification for any intrusion at each stage. So the decision to gather is always taken separately from the decision to transmit.”

**7.4.11 Editorial Guidelines**

This form must be used to record the approval process and the separate decisions to gather and broadcast secretly recorded material. The authorisation to broadcast may be recorded by email.

A signed record must be kept of the approval process, even if the request is turned down. Each Division must also maintain a log of secretly recorded material even if it is not broadcast.

This form should be completed in accordance with the BBC Editorial Guidelines Section 7 Privacy. See also Editorial Policy Guidance – Secret Recording, which includes advice on completing this form

A list of Divisional Authorisers can be found [here](#)

**PROGRAMME DETAILS**

<b>PROGRAMME NAME</b>	Panorama Detention
<b>PROPOSED RECORDING DATE, IF KNOWN</b>	Tbc Ambtion is: April May 2017
<b>YOUR NAME</b>	Joe Plomin
<b>JOB TITLE</b>	Producer / Director
<b>DEPARTMENT</b>	Current Affairs
<b>OUT OF HOURS CONTACT (MOBILE NUMBER)</b>	<div style="border: 1px dashed black; padding: 2px;">DPA</div>

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## PROPOSED SECRET FILMING/RECORDING

### BRIEF SUMMARY OF STORY

Using secret cameras, BBC Panorama exposes extreme failings at a detention centre.

In the last 20 months intelligence about this centre has provided evidence of mistreatment, physical abuse and a culture of criminality towards detainees, as well as a loss of control combined with indefinite detention which has a major negative impact on the mental health of detainees.

The primary subject of our investigation is prison-like in aspect and in terms of security, currently holds approximately 400 detainees, 22% of whom in the last four months of 2015 were foreign national offenders ("FNOs"; people resident in the UK, who have been convicted of a crime here). There has been a change in the contract such that this centre will begin taking more FNOs (exact percentage not known). The accommodation currently comprises two men per room – each room resembles prison cell. Detainee's average length of stay has increased to 48 days (something criticised by a very recent inspectorate report, more about which below, see section 3, *prima facie* evidence, penultimate paragraph). However, that disguises the fact that on one day in February we had a list (which would not have been comprehensive) of 11 detainees who had been in custody at this centre for more than six months.

As well as FNOs (as above), there are failed asylum seekers and economic migrants – it is a holding place for people who it is deemed need to be held while their claims are considered or in order to facilitate their removal from the country.

The intention is that the wider film will also expose the continued failure of the authorities to remove foreign nationals from the UK who either want to leave or are cleared for removal – while they are at the same time kept indefinitely in poor conditions and sometimes are alleged to be being poorly cared for or even mistreated by guards, who are themselves losing control.

There are a number of reasons why removals are not occurring. They include:

- 1/ Detainees being warned or 'catching wind' of an imminent removal which allows them to take action to prevent their own removal (for example, hiding on top of a basketball hoop or slathering themselves in baby oil or performing acts of self-harm);
- 2/ Escort staff not being available to remove detainees;
- 3/ Administrative mistakes, for example where a detainee's paperwork (passport, visa etc) is not brought to the airport.

According to a report published in 2016 by the Immigration Inspectorate, many of these problems occur because of poor coordination between Home Office caseworkers, the Detainee Custody Officers tasked with removing detainees (who work for a different company Tascor) and the company responsible for arranging the actual flights.

The Home Office said these issues would be resolved after that same report at the beginning of 2016 showed significant sums of money being spent and airline tickets purchased per successful removal, but Panorama has received evidence from this centre which suggests these problems are ongoing, and that the impact on detainees is serious – psychologically being set up to leave and then staying is difficult, as is physically being held in detention even when someone is not being currently punished for a crime and is not being removed.

The detention centre rules say:

"Purpose of detention centres.

—(1) The purpose of detention centres shall be to provide for the secure but humane accommodation of detained persons in a relaxed regime with as much freedom of movement

and association as possible, consistent with maintaining a safe and secure environment, and to encourage and assist detained persons to make the most productive use of their time, whilst respecting in particular their dignity and the right to individual expression. (2) Due recognition will be given at detention centres to the need for awareness of the particular anxieties to which detained persons may be subject and the sensitivity that this will require, especially when handling issues of cultural diversity."

(64)

## **SUBJECT AND/OR BEHAVIOUR TO BE RECORDED**

BBC Panorama has received detailed first hand intelligence about this centre dating across the last 21 months (since 15<sup>th</sup> of June 2016) (see next section for more detail about which). The antisocial or illegal activity revealed by that intelligence has varied at different times.

Our evidence suggests that in any given month there may be either: drug-fuelled health emergencies and violence between detainees; or violence and theft against detainees by some officers; or testimony and incidents that provide evidence of repeated failures to remove detainees scheduled for deportation and substantial instances of loss of control. (The last is a summary of the main issues being seen in the last couple weeks).

Throughout the 20+ months we have particularly detailed evidence related to there has also been persistent (ongoing and repeated) evidence of a number of other systemic failings, antisocial or potentially illegal activities. These include: poor morale among officers, high turnover with new recruits and experienced officers quitting, loss of control over or respect from detainees, significant psychological problems among detainees held indefinitely resulting in serious self harm, detainees going onto wings where they not supposed to have access and suicide attempts to which most officers and even some qualified nurses seem inured or even amused and paperwork being faked in relation to checks on vulnerable detainees.

There is scope to gather evidence of wrong doing by individuals as well as institutional and management failings.

### **1. Conditions and detainees of particular concern to some sources**

There are – we note from confidential sources, on record sources and the inspectorate – environmental difficulties with this centre: it was designed for short stay accommodation, has few facilities and a tiny outdoor area. It is built on the design of a category b prison. There is only a small fitness room.

There are detainees whose cases are particularly of concern to some sources – notably, EU migrants detained for minor infractions (like homelessness) or adults who have lived all their life in the UK but then been detained for relatively minor infractions (like possession of marijuana). Others are subject to deportation, despite having young children in the UK, now that the Immigration Act empowers the British government to deport people before they appeal – on the basis that they can appeal in their home country or apply for a visa from there.

Our main source has noted a number of occasions when officers (and managers) have been kowtowing to more evidently criminal or dangerous detainees (for example taking them to get their property etc) but then either being rude to and or not helping detainees perceived to be less dangerous (for example migrants picked up working in restaurants etc).

### **2. Mistreatment and Abuse (potentially amounting to assault)**

We have evidence that a number of “detainee custody officers” (‘DCOs’) and “detainee custody managers” (‘DCMs’) have mistreated detainees.

DCM Jack Banister put a detainee in a headlock, unnecessarily, because the detainee was not going back to his cell. This initiated a use of force, and as such, two other officers had to perform locks on each arm. The detainee was then taken down to solitary confinement by force, where he was then locked up. This allowed the roll count of detainees to be called earlier (and therefore they could go home earlier) than if they had negotiated. **This incident witnessed by a source, first hand.** He is also close associates with DCM G Panel and DCM D Roffey (see below).

DCM Graeme Panel shouted "bend them up" and "twist his wrist" prior to a restraint – and called a detainee a "fucking idiot" and mocked a mentally ill man who had covered himself in faeces. On another occasion he unnecessarily restrained a detainee who had been self-harming, inventing an excuse for restraint. **These incidents witnessed by a source, first hand.**

DCM David Roffey was involved with mocking the same mentally ill detainee as G Panel (above). **This witnessed by a source, first hand.** Described by others as heavy handed, during restraint, DCM Roffey is particularly alleged to hit detainees with his shield, inappropriately. **This is hearsay, told to our sources.**

DCO Andy Jennings mocked the same mentally ill detainee as DCM Panel and DCM Roffey (above). He joked that he'd like a detainee on constant supervision to kill himself "nice and early in the week" so he didn't have the chore of constant supervision duties. **This witnessed by a source, first hand.**

DCO Chris Malden said to another custody officer that he deliberately broke a detainee's finger during a restraint. **He said this, to one of our sources.** He has recently left the centre (to work in Gatwick airport security).

DCO Jason Murphy boasted about "smashing" a detainee against the back of his cell. Mr Murphy also stated he then smashed the detainee on the floor into his excrement "we just held him there laying in his own piss and shit." On a more recent occasion he bragged that he had made a detainee "cry" and "bent him up" for pointing at him (Mr Murphy) "one too many times". **He said both of these things, to one of our sources.** He now works in security.

DCO Adam Stringer is said to have struck a detainee in the face with a riot shield deliberately, and then more recently to have badly damaged a detainee's head during a physical restraint. **This is hearsay, told to our sources by witnesses to both events.** He has left the centre.

DCO Derek Murphy bragged recently that he had kneed a detainee in the face during a restraint. **He said this, to one of our sources.**

DCO Alex Davies was suspended after being reported for stamping on a detainee during a restraint, but is now back at work. When placed on reception duty for new detainees rather than primary custody duty DCO Alex Davies commented that he was 'upset' that he was unable to 'bend anybody up' ie forcibly restrain detainees. **He said this, to one of our sources.** He has now left the centre. (The events above this point, in this section ["mistreatment and abuse"] took place between Spring and Autumn 2016).

On the 14<sup>th</sup> of March 2017, DCO Dan Small told our main source that he was attacked by a small afghan detainee Care and Segregation Unit on the 13<sup>th</sup> and that DCO Derrick Murphy responded by 'choke slamming' him (this is a technique where you pull someone into a choke hold against your other arm – it is not an authorised technique). DCO Small said DCO Murphy was squeezing so hard that DCO Murphy's face went bright red. DCO Small said both he and Murphy then restrained the detainee using approved techniques outside the office because there were CCTV cameras.

There is one area where we may (depending on expert advice given later) question the restraint being used on detainees, as taught to officers: at a secure NHS hospital, David "Rocky" Bennett was killed in 1998 by the excessive use of face down restraint (he was held face down for 20 minutes). Face down restraint is used at Brook House, but our operative is well briefed to understand when it is being used for too long, or where there is particular danger of chest compression or pressure on breathing. Seeking outside specific professional advice to bolster that training and advice.

Our evidence is that where force is misused that officers then deliberately create a false record of what has happened, by for example saying "he placed a shield against him" or leaving out events (for example where someone was "bent up" or choked). These reports are often read out and laughed about later, which should provide an opportunity to film the falsification of the record.

### 3. A Culture of Criminality Towards Detainees

Graeme Panel is said by two first hand witnesses to have stolen £200 from the office several years ago (some time between 2011 and 2015). The money was meant for a detainee in the centre. Other staff alleged that Panel had stolen money on a number of occasions since that time and that

money had gone missing totalling thousands of pounds. The incident involving DCM Panel was reported by the custody officer present to management at the centre. No one has yet been suspended for the incident.

ACO Lesley Jones is alleged to have stolen money from detainees property and incoming post, as well. (This again is second hand, a witness has told our source this was witnessed on a date before June 2015).

Despite this, both Graeme Panel and Lesley Jones continue to work at the centre.

In early 2017, ACO Leah X was suspended after being met by plain clothes police (but not arrested) and escorted off centre premises for suspected drug smuggling to detainees.

#### 4. Loss of Control, Chaos (including drugs) and a Failure to Remove Detainees

(This, section 3, is current and continuous – throughout our 20+ months' evidence, but with particular 'peaks' as noted below).

The morale among DCOs is very low. They describe the atmosphere as 'toxic'. The turnover of staff has been increasing and with each new recruitment period; with the result that there are more inexperienced staff who cannot control situations appropriately which has led to a significant increase in difficult and often avoidable episodes of violence, self-harm and suicide attempts –for example when a new recruit told a number of detainees they were going to be removed from the country, inaccurately.

There has been a repeated failure of detainees to be 'locked down' (to return to their cells when ordered). There have been some instances when control was lost – for example officers being pelted with footballs and having to retreat, without punishment for the ring-leaders involved later. (This took place on 16.5.16).

There is a poor and inconsistent use of the proper punishments ('sanctions') available to staff.

There are frequent fights between different groups of detainees.

There is increasing disruptive and non-compliant behaviour and staff are losing control when detainees are trying to incite riots.

There are repeated issues caused by the use of drugs and in particular the New Psychoactive Substance, 'Spice'. This issue reached epidemic proportions over Christmas 2016 / New Year 2017 - there were 23 'Spice attacks' on 5<sup>th</sup> of January 2017. According to one former detainee Panorama has spoken to drugs are readily available, thrown into the yard (this may temporarily abate now because new netting has been put up and officers are monitoring the courtyards, but the expectation among most officers is that monitoring will cease and the netting will as previously be neglected and holes in it not repaired) and brought by visitors. There are days when the Centre smells strongly of cannabis. As above (last paragraph in "2. A culture of criminality") one officer was caught apparently bringing in drugs.

There have been a number of occasions when detainees have avoided removal through poor management. One was warned and sat on top of a basketball hoop, refusing to come down (Christmas time 2015). Another slathered himself in baby lotion and resisted physical restraint (26.6.16).

There was an escape by an Albanian detainee in March 2016. On the 6<sup>th</sup> of December 2016 a detainee was found with long rope ie escape material. Every day detainees are found on wings they should not have had access to either because officers don't check the prisoner's detainee id card or are told to "fuck off" when they ask to check a card and don't have the personal authority, confidence or back up to respond. Our main source tells us this kind of attitude towards staff is common place.

There have been instances of detainees taking each other hostage, one such incident occurred on Christmas day 2016, which our source attended.

On the 7<sup>th</sup> of January 2017, our main source witnessed a detainee smoking where that is not allowed and began writing a written warning (a formal note about misbehaviour). The detainee tried to attack our main source and was prevented by another DCO and another detainee.

A detainee and an officer have separately described to Panorama the cells as more crowded, with fewer amenities and poorer access to mental healthcare and other services than those found in UK prisons, despite the fact that many detainees have not committed crimes, beyond overstaying their welcome.

On the 8<sup>th</sup> of March, a number of Jamaican detainees evaded removal by standing on the safety netting inside this centre. Separately – campaigners outside this centre argue that many of the Jamaican detainees scheduled for deportation should not have been deported and or would not have been if they had had proper representation.

Separately a detainee is said to have escaped his handcuffs some weeks ago, for which an officer is being disciplined (the detainee did not escape the centre or come close to making an escape).

5. Mental health effects of indefinite detention, poor healthcare and officer responses to the effects of mental health concerns (including self harm and suicide attempts), and poor management of these concerns.

(This is continuous throughout our evidence, but is particularly rife currently).

The lack of mental health provision within this centre is concerning with suicide attempts / episodes of self harm being a serious problem. Of late there have been multiple suicide attempts and instances of self-harm. In February 2017 our main source reports the healthcare team makes no real assessment of mentally unwell detainees' needs, there is a shortage of observation cells and a tendency to rely on segregation as the default mental health measure (although we note the recent prison inspectorate finding that according to records there is less use of the official Care and Segregation Unit than in the past at this centre).

An Iranian detainee was informed of his imminent removal, that his flight had been arranged. This resulted in one of the most extreme incidents of self-harm our source has witnessed first-hand. The detainee had used a bladed implement to slash his neck and wrists. Our source described blood being 'spread across the walls and floor of his room'. It transpired that the detainee had been given incorrect information. He was not being flown back to Iran but transferred to another centre. While this event, attended by our source, was unfolding, there were two other detainees simultaneously self-harming due to being given the same incorrect information told they were being removed from the UK.

Separate to the above examples, 16 members of staff in total were assembled for the removal of one detainee with mental health issues recently (9.2.17). There were 6 kitted officers, 6 Tascor (Escort) officers, 2 DCM's, 1 Senior Manager and a nurse from healthcare. The attending nurse remarked upon the detainee's complaints of being unable to breathe in a restraint: 'If he can shout, he can breathe'. Our main source states that the removal took an hour in total, which is much longer than usual albeit using the correct restraining methods.

In another example, a detainee believed by officers to have a history of serious mental illness was left to sit naked and in his own excrement for over five hours. Rather than removing the detainee to a clean and safe location he was called a "fucking idiot" by a custody manager, locked in his cell with the power turned off. The detainee remained locked in his cell for at least five hours and possibly longer. Another detainee was left in segregation beating his head against the wall – and never should have been in segregation in the view of our source, given his vulnerability. This is extreme but not unusual – our main source has personally witnessed around half a dozen similar incidents. There is a more general concern about the over use of segregation with mentally ill detainees, more broadly.

Given the failure to safeguard some these individuals there may be circumstances in which our operative will need to evidence and therefore secretly record conversations he has with managers, and their response.

The behaviour and attitude of healthcare staff has been a particular concern during some of the above incidents, as noted. We are told that medical staff at this centre have on occasion given

detainees medication to quieten them down including prior to deportation, without their informed consent (we are told medical staff said "this will make you feel better" without explaining what it was). Some sources have alleged that both Home Office funded legal advice for detainees is of poor quality and hard to access and that Home Office decision making is poor – for example with obvious example of torture being discounted, or evidence of the age of a detainee being unfairly disregarded.

There are detainees who previously had been seen by our main source in good spirits who have then declined, for example one Moroccan detainee who had appeared to be coping relatively well under the (then, in future tbc) more open and gentle regime at another centre but who since moving to 13 hour lock up and prison conditions at this centre has declined massively: he has self-harmed a number of times, appears dishevelled, looks older, can't speak clearly, voice has changed, slurs, can't string together a sentence etc.

Other recent examples relevant to this section include:

-5/12/16 – detainee who our source was told had been seen swallowing a razor blade and boiling water mixed with cleaning fluid – due to no longer wanting to be detained. Put on constant supervision – at the same time, 19 prisoners were on ACDT (Self harm reduction strategy).

-19/12/16 – detainee tried to hang himself rather than go to HMP Belmarsh.

-31/1/17 – detainee on constant supervision (suicidal) but not in a constant supervision room (which would have probably prevented what happened next) – tried to set himself on fire using paper. Issue with the centre only having two high supervision rooms so some high risk detainees end up in normal cells.

-16/2/17 - One Polish detainee wrote on the walls in his own blood after cutting himself.

- 23/2/17 Another incident of self harm witnessed first hand by our main source – detainee found to be cutting himself with an energy drink can and also belived to had drunk shampoo or / washing up fluid – detainee clearly unstable and had been released from constant supervision one hour previous to the incident

#### 6. A second adjacent centre

In late April, the adjacent immigration removal centre will reopen as a holding centre for children and families due for deportation. Previously that function was performed by an entirely different centre (Cedars) in a different part of the country. The managers who are being brought in to run this second adjacent centre – particularly Sarah Newland – previously were responsible for managing "out-of-country" escorts, and managed and oversaw the detainee custody officers who were alleged to be responsible for the death of detainee Jimmy Mubenga in October 2010. This second adjacent centre was traditionally much better – both in terms of accommodation, culture and training – than the main centre we are investigating, despite both being overall under the management of the same person. There are specific concerns from a number of sources that the culture of the second adjacent centre will change for the worse under Ms Newland. We will continue to monitor evidence, as it reopens. Our proposed undercover operative occasionally is tasked with working at the second adjacent centre. If that occurs within our time scale we will assess what evidence is held about the second adjacent centre at that point and take advice where appropriate. We would submit a second separate application seeking permission for secret recording.

#### **DESCRIBE THE PRIMA FACIE EVIDENCE FOR THE BEHAVIOUR TO BE SECRETLY RECORDED**

The evidence these issues are ongoing comes from:

- 1/ a current detainee custody officer ("DCO") who continues to work at the site
- 2/ other guards he ("1/") is speaking to, who do not know he is passing information to us
- 3/ a detainee who left in 2016.

We have documentary evidence of the employment of the DCO (above, pt "1/"). This DCO has

worked with us since January 2016, and has proved both reliable and convincing throughout his testimony to us – often provided daily. He has been robustly assessed at a number of different times. This DCO is prepared to put his evidence on the record (on camera) and is clearly very aware of how it will be tested in that scenario.

This DCO has kept a handwritten detailed contemporaneous diary since the 16<sup>th</sup> of May 2016 detailing all of the allegations above which have taken place since that date. Prior to that he was debriefed by one of two BBC members of staff over the telephone as soon as possible after shifts.

We are confident given the duration of the relationship, the extent of the documentation, the assessments of him we have conducted and the circumstantial evidence (times and dates at which we can speak, the detail of his testimony) that he is a credible witness and a trustworthy source.

A former detainee has in 2016 provided detailed evidence about how drugs get into the detention centre and also says there were a number of Albanians who wanted to leave but where their flight was cancelled because of lack of escorts, who protested. He himself was finally asking to leave, to be deported, saying “rather than be in detention I’ll leave” but the Home Office could not get the Congo to give him papers, but still kept him in detention. There were also just on his detention wing four Jamaicans who wanted to return but didn’t go, but then once they refused to leave then suddenly they were deported. This source’s cell-mate was at first resisting removal but then was willing to return to Nigeria. Again however, he was not removed but kept in detention. That was the situation until the cell mate was handled roughly with undue force during a restraint (he’d been complaining about staff taking milk meant for detainees) – once he started making a complaint including to lawyers about that treatment he was removed from the country. The allegation in sum is that removal decisions are being made based not on individual legal circumstances but instead to protect the detention centre from reputational damage.

Finally, there are other – confidential – sources of information provided to BBC Panorama.

Between 2011 and 2013 there were a number of concerns about the centre listed in official inspection reports. The penultimate inspection by the prison inspectorate reported in 2013 that the centre was “a safe place” but that “Detainees were too often subject to needless night-time transfers, and arrangements to receive and induct new detainees were slow and poor” and that “there was considerable frustration among detainees, which was reflected in high levels of self-harm”.

Since that report, there has been another inspection published, during which our source’s impression was that the centre was attempting to show itself in a better light than it can usually perform – by increasing the number of staff on duty, taking everyone off leave / holiday and ensuring everyone was on their best behaviour. The report from that inspection found “the centre had improved” and was “reasonably good”. This is in contrast to the evidence of our sources. As above (Section 1, “Brief Summary”, paragraph 3) the inspectorate has corroborated and indeed extended our main source’s evidence that although the average stay has increased to 48 days (a change the inspectorate says had not been analysed) that “23 detainees had been held for over a year, four of these for over two years. The longest detention was for over two and a half years”. 37% of detainees were reported to feel unsafe.

The centre is also monitored by the local independent monitoring board. Their 2015 annual report criticised the company who conducts removals (a different company) Tascor’s removal planning being driven by business considerations and sometimes chaotic. They also found detainees property is lost by staff at this centre. There are positives in that same report, including, “Management has

<p>high expectations of staff and there are many examples of good and dedicated work by officers and managers with a continuing commitment to safety”.</p>	
<p><b>ARE ANY SOURCES /INFORMATION CONFIDENTIAL? IF YES, TICK HERE</b>  <i>If ‘Yes’, be aware this form could be disclosed. Take care not to include confidential information or details that could help identify sources.</i></p>	<p style="text-align: center;"><input checked="" type="checkbox"/></p>
<p><b>WHAT ALTERNATIVE METHODS OF REVEALING THE BEHAVIOUR HAVE BEEN CONSIDERED?</b>          Our evidence as above is that even official inspectors are not seeing a true reflection of the performance of this immigration removal centre. An open approach to film at the centre would necessarily not be able to film the sort of evidence – particularly of poor management, lack of security and particularly potentially criminal behaviour – which our sources suggest is endemic.</p>	
<p><b>HOW IMPORTANT IS THE SECRET FILMING/RECORDING TO THE ABILITY TO TELL THE STORY?</b>  <i>Consider, for example, its evidential significance</i>          Inescapable – there is no other way to tell this story and no other way to gather this evidence.</p>	

## METHOD OF FILMING/RECORDING

<p><b>DESCRIBE THE PROPOSED COVER STORY AND ANY PLANNED DECEPTION BY THE PRODUCTION</b></p> <p>The possible, proposed undercover reporter already works as a detainee custody officer at Brook House IRC. Because of this they would need to use limited deception compared to those deployed in previous similar investigations.</p>
<p><b>DETAIL THE EQUIPMENT TO BE USED AND WHERE IT WILL BE PLACED</b></p> <p>Undercover reporter will wear “body worn” covert filming equipment as per previous similar investigations. (Contained either in his t-shirt and or his riot gear top).          There may be occasions during which our operative will use a camera lens position inside the rucksack our operative carries into work, as well. This will not record regularly on his way into work, but during recent (as at 11.3) trips into work there have been a number of conversations while he went into the Centre which were particularly evidential, for example: staff talking about detainees evading removal during a charter flight, and an assault on a member of staff the night before. All of these methods of filming are ‘attended’ i.e. body worn filming.          However, we believe it may become necessary to employ unattended filming devices during the course of this investigation – in setting where our operative is witness to significant wrong doing but cannot stay to record those events, personally. Any such request will be made in a new, additional application for secret recording permission.</p>
<p><b>WHO IS OPERATING THE EQUIPMENT AND, WHERE NECESSARY, WHO WILL ACCOMPANY THEM?</b></p> <p>As above. Backup by experienced BBC staff nearby as per previous similar investigations</p>

## ADVICE

<b>PLEASE TICK TO CONFIRM THAT YOU HAVE DISCUSSED THE PROPOSAL WITH EDITORIAL POLICY</b>	<input checked="" type="checkbox"/>
<b>DATE OF DISCUSSION</b>	16/03/2017
<b>NAME OF EDITORIAL POLICY ADVISER</b>	Philip Abrams
<b>EDITORIAL POLICY ADVISER'S COMMENTS</b> Information confirming the reliability of the sources has been discussed with me providing me high confidence in the quality of the prima facie evidence. There has been a detailed discussion of the secret filming form and changes made in light of that advice.	
<b>HAVE YOU DISCUSSED THE PROPOSAL WITH EDITORIAL LEGAL?</b>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<b>NAME OF LAWYER</b> <i>Enter name only</i>	Roger Law
<b>WHERE NECESSARY, HAVE YOU AGREED SAFETY PLANS WITH A SAFETY ADVISER</b>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<b>NAME OF SAFETY ADVISER</b> <i>Enter name only</i>	Karen Peak

## AUTHORISATION TO FILM/RECORD

***"Any proposal to gather material illegally outside the UK by disregarding privacy or other similar laws in the relevant country must be referred to Director Editorial Policy and Standards."***

*Editorial Guidelines 7.4.11*

<b>IS THE SECRET RECORDING TAKING PLACE OUTSIDE THE UK AND IN BREACH OF PRIVACY OR OTHER SIMILAR LAWS IN THAT COUNTRY?</b>	Yes: <input type="checkbox"/> No: <input checked="" type="checkbox"/>
<b>IF YES, HAS THE SECRET FILMING / RECORDING BEEN REFERRED TO DIRECTOR EDITORIAL POLICY AND STANDARDS?</b>	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
<b>IS THE SECRET FILMING/RECORDING APPROVED BY THE DIVISIONAL AUTHORISER?</b>	Yes: <input checked="" type="checkbox"/> No: <input type="checkbox"/>
<b>PLEASE SUMMARISE REASONS FOR DECISION</b> <i>Consider the public interest served by revealing the behaviour, whether the intrusion and any deception involved is proportionate to the seriousness of the behaviour, whether the behaviour could be revealed without the secret recording, and the prima facie evidence.</i>  Strong evidence of serious wrong-doing from very strong sources: the proposed recording is merited and proportionate to gather first-hand evidence of high public interest.	

<b>AUTHORISED BY</b>	Jim Gray
<b>JOB TITLE</b>	Dep head CA/Exec Editor, Panorama
<b>DIVISION</b>	NEWS
<b>DATE</b>	30/03/2017
Once authorised, the completed form should be filed in Divisional records and must also be emailed to Editorial Policy at: <span style="border: 1px dashed black; padding: 0 20px;">DPA</span>	

## AUTHORISATION TO BROADCAST\*

<b>IS TRANSMISSION OF THE MATERIAL APPROVED BY THE DIVISIONAL AUTHORISER WHO SIGNED OFF THE ORIGINAL REQUEST OR HIS / HER NOMINEE?*</b>	Yes: <input type="checkbox"/> No: <input type="checkbox"/>
<b>PLEASE SUMMARISE REASONS FOR DECISION</b> Consider the importance of the material to the story and any identification issues Click here to enter text.	
<b>AUTHORISED BY</b>	Click here to enter text.
<b>DIVISION</b>	Click here to enter text.
<b>DATE:</b>	Click here to enter a date.
Once authorised, the completed form should be filed in Divisional records and must also be emailed to Editorial Policy at: <span style="border: 1px dashed black; padding: 0 20px;">DPA</span>	

\* This requirement can also be fulfilled by email and kept with the form.