

<p>1 Tuesday, 15 November 2011 2 (10.00 am) 3 Housekeeping 4 LORD JUSTICE LEVESON: The message on Mr Sherborne's screen 5 has been investigated. It was no more than the 6 operation of anti-virus software that is a consequence 7 of using a system that allows access to the Internet and 8 permits use of removable media devices such as USB 9 sticks. It does not mean that the Inquiry systems were 10 accessed unlawfully but rather demonstrated the system 11 was working as it should, and might mean no more than 12 the presence of a corrupt file on the local machine. 13 I'm very keen to make it clear that the only 14 documents which will be on the system which can be 15 accessed in court are those that are or will shortly 16 become publicly available. Material that is 17 confidential to the Inquiry is not held on the hearing 18 room system but is only available through the 19 government's secure intranet. 20 I am grateful to Mr Sherborne for bringing this 21 matter to my attention. The systems will be routinely 22 scanned for potential threats, but in the meantime, if 23 there are any concerns in the future, they should be 24 brought to the attention of a member of the Inquiry 25 team, who will immediately initiate appropriate</p> <p style="text-align: center;">Page 1</p>	<p>1 behest of staff working at the News of the World. 2 That phone hacking was wrong. It was shameful. It 3 should never have happened. News International 4 apologises for it unreservedly. Nothing that it has 5 said on its behalf during this Inquiry is intended to 6 detract from or qualify that apology in any way. 7 I must add that we accept that phone hacking at the 8 News of the World was not the work of a single rogue 9 reporter. We accept that there was no public interest 10 justification for it and we further accept that it was 11 not the subject of a proper and thorough investigation 12 until the Metropolitan Police began Operation Weeting 13 in January this year, following the supply of certain 14 material to them by News International. 15 In addition, we regard as wholly unacceptable the 16 commissioning of a private investigator to carry out 17 surveyance of lawyers acting for claimants or of Members 18 of Parliament on the Select Committee. I should say 19 that watching what people are getting up to is an 20 old-fashioned and perfectly proper journalistic practice 21 in many circumstances, but in this instance it wasn't 22 journalism at all and it was unacceptable. 23 The question of exactly who was involved and in what 24 way at the News of the World is the subject of the 25 continuing police investigation, and I cannot go into</p> <p style="text-align: center;">Page 3</p>
<p>1 investigations. 2 Right. Mr Davies. 3 Opening submissions by MR DAVIES 4 MR DAVIES: Good morning, sir. At this Inquiry, I appear 5 with Anthony White and Anna Boase instructed by 6 Linklaters for NI Group Limited. The letters "NI" stand 7 for News International, and that is what I am going to 8 call it. 9 News International is the company which owns News 10 Group Newspapers Limited, which published the Sun 11 newspaper and which used to publish the 12 News of the World until that paper ceased publication on 13 10 July this year. News International also owns Times 14 Newspapers Holdings Limited, which itself owns Times 15 Newspapers Limited, which publishes the Times and the 16 Sunday Times. 17 News International welcomes this Inquiry. It 18 intends to co-operate fully with the Inquiry and it 19 looks forward to contributing to the debate on the 20 future regulation of the press in the United Kingdom. 21 It is right that at the formal opening of this Inquiry 22 and in public, I should repeat on behalf of 23 News International the apologies that have been made to 24 all those whose phones were hacked or whose families, 25 friends or associates' phones were hacked by or at the</p> <p style="text-align: center;">Page 2</p>	<p>1 that whilst those investigations are continuing, 2 although there is one point which I am going to refer to 3 in a moment. 4 Before I do that, I can and must say that not 5 everyone who worked at the News of the World was 6 involved. There were many fine reporters and staff who 7 worked at that newspaper who had no involvement in phone 8 hacking and who have suffered in the fallout through no 9 fault of their own. 10 In his opening address yesterday, Mr Jay referred 11 frequently to News International. We make no complaint 12 about that but it is necessary to bear in mind that 13 News International has and had several horses in its 14 stables, and each has or had a stable of its own. 15 LORD JUSTICE LEVESON: Yes, I think on one occasion 16 I actually corrected him and said News of the World. 17 MR DAVIES: Yes, sir, you did, and we were pleased to hear 18 it. 19 As you know, before the News of the World closed, 20 there were four major titles: the Times, the 21 Sunday Times, the Sun and the News of the World. At all 22 times, each title has been run by its own editor, quite 23 separately from its stable mates, and each paper has 24 had, below its editor, its own editorial staff and its 25 own journalists. There has been some sharing of support</p> <p style="text-align: center;">Page 4</p>

<p>1 services but in journalistic terms they are separate and 2 quite often competitive operations.</p> <p>3 As I have already mentioned, the Times and the 4 Sunday Times are published by Times Newspapers Limited, 5 while the Sun and formerly the News of the World are 6 published by News Group Newspapers Limited. Despite or 7 perhaps because they were published by the same company, 8 the Sun and the News of the World not only operated 9 separately; they positively competed against each other. 10 Very recently, it had been intended that they should 11 share a managing editor, but that arrangement had 12 scarcely begun before the News of the World was shut.</p> <p>13 So it is perfectly correct to say that the four 14 papers are or were under the same roof, but they are or 15 were very different papers with, crucially, different 16 editors and different staff. It is, therefore, 17 necessary to be very careful before extrapolating from 18 some people at the News of the World to everyone at the 19 News of the World and necessary to be very careful again 20 before extrapolating from the News of the World to other 21 papers under the News International roof.</p> <p>22 If I now return specifically to the 23 News of the World, just before lunch yesterday, Mr Jay 24 reviewed in a numerical fashion the information to be 25 derived from the Mulcaire notebooks. I must say</p> <p style="text-align: center;">Page 5</p>	<p>1 surprise on our side. As I have said, we do not have 2 all the notebooks, but we knew that there were five 3 legible corner names which could be correlated with 4 names of News of the World journalists, those being 5 Mr Goodman and A to D. We also know that the police 6 believe that there are a number of others who can be 7 correlated to News of the World journalists but we do 8 not know the names and we are in no position to assess 9 that one way or another, nor do we know how many, but 10 our understanding is that it certainly does not add up 11 to 27. Given the arithmetic which I went through just 12 now, it does sound a little surprising if that rump of 13 123 taskings in fact contained at least another 21 14 News of the World journalists whom we are unable to 15 identify.</p> <p>16 I don't want to present this as more important than 17 it is. 2,266 taskings is 2,266 too many, five 18 journalists known to have been commissioning them from 19 the News of the World is five too many, and the corner 20 names may not be the beginning and end of evidence of 21 involvement. It may be possible to be involved without 22 being a corner name at all. But nonetheless we think it 23 is necessary to be accurate as far as possible and we 24 would like to have this information rechecked. I'm sure 25 that we can discuss with the Inquiry team and the police</p> <p style="text-align: center;">Page 7</p>
<p>1 immediately that we have never seen the whole set of 2 Mulcaire notebooks. I believe the only people who have 3 are the police.</p> <p>4 When summarising them, Mr Jay said that the 5 notebooks showed 2,266 taskings, and he gave the number 6 attributed via the corner names to each of four 7 News of the World staff, to whom he referred by the 8 cyphers A, B, C and D. The taskings attributed to these 9 four added up to 2,143. Some arithmetic shows that that 10 leaves 123 taskings not accounted for by those four 11 individuals. Those 123 taskings must include 12 Mr Goodman, who we know was at least reasonably active 13 and who was not included in the four given the cyphers 14 A, B and C and D. I should say that Mr Goodman's is the 15 only name which I intend to use.</p> <p>16 The 123 must also include the corners marked 17 "private", and it must also include those that are 18 eligible. We don't know how many that leaves but it 19 doesn't seem likely to be very many.</p> <p>20 However, Mr Jay also said that, ignoring the 21 "private" corner name and the eligibles, we have at 22 least 27 other News International employees. That is 23 a quote from yesterday's transcript. This is a context 24 where News International means the News of the World, 25 but apart from that, the statement has occasioned some</p> <p style="text-align: center;">Page 6</p>	<p>1 how that might be done.</p> <p>2 There is one other point I wish to mention, which 3 concerns the Sun. Mr Jay also referred to a claim made 4 by Mr Jude Law alleging phone hacking by or for the Sun. 5 Mr Jay said that Mr Law alleges that his phone was 6 hacked by the Sun and that part of the evidential matrix 7 in support of his case is a corner name in the Mulcaire 8 notebook which simply states "the Sun", without 9 specifying the individual working there.</p> <p>10 As a result of Mr Law's claim, we do have the pages 11 of Mr Mulcaire's notebook which we think are those 12 referred to. We have them because Mr Law, as 13 I understand it, obtained them from the police by 14 a disclosure order and then disclosed them to us.</p> <p>15 But the reference to them came as a bit of 16 a surprise, because we only have them under the terms of 17 the strict confidentiality undertakings given to 18 Mr Justice Vos. They are not, so far as we are aware, 19 in the public domain.</p> <p>20 That gives rise to a difficulty, because it means 21 that I cannot respond to what Mr Jay said without going 22 further into material which is not in the public domain. 23 All I can say is that it is quite true that Mr Law has 24 made a claim in respect of hacking by the Sun. That 25 claim is disputed, and we do not accept that the</p> <p style="text-align: center;">Page 8</p>

<p>1 documents referred to by Mr Jay provide it with any 2 cogent support.</p> <p>3 We will have a discussion with the Inquiry team as 4 to how all concerned can avoid incremental disclosures 5 of material which is not in the public domain through 6 one party referring to it, another wanting to refer to 7 a bit more to deal with the assertion and then perhaps 8 the first party wanting to refer to a bit more again and 9 so on. There is a risk of a spiral there, and we should 10 and we will have a discussion as to how to avoid it.</p> <p>11 I must now turn to the steps which have been taken 12 within News International to put matters right. First, 13 in July this year the decision was taken to close the 14 News of the World, and that newspaper published its last 15 issue on Sunday, 10 July this year.</p> <p>16 Secondly, a management and standards committee was 17 established in July 2011. The committee has an 18 independent chairman, Lord Grabiner QC, and a reporting 19 line which runs up to Mr Viet Dinh, an independent 20 member of the main board of News Corporation and 21 previously an assistant Attorney General of the 22 United States. The terms of reference of the management 23 and standards committee require it to ensure full 24 co-operation with this Inquiry and with the police 25 investigations and to carry out any necessary internal</p> <p style="text-align: center;">Page 9</p>	<p>1 of News Corporations' standards of business conduct has 2 been issued to all staff.</p> <p>3 That document has been provided to the Inquiry. It 4 sets out the standards of ethical and lawful conduct 5 expected of staff and includes a procedure for reporting 6 breaches of those standards, if necessary anonymously. 7 By reminding staff of those policies, by approving and 8 implementing new policies on matters such as compliance 9 with the Bribery Act and whistle-blowing, and by 10 a process of training, steps are being taken to ensure 11 that every member of staff at News International, 12 including all staff of the three newspapers, understands 13 that they are expected to abide by the law and by the 14 highest ethical standards of professional conduct and 15 with the Editors' Code of Practice published by the PCC.</p> <p>16 News International believes that the staff at the 17 Times, the Sunday Times and the Sun do not require to be 18 reminded of appropriate standards of lawful and ethical 19 behaviour, but we wish to ensure that there can be no 20 repetition of what occurred at the News of the World. 21 The Inquiry will know that since 1981, the corporate 22 governance structure of Times newspapers Holdings 23 Limited has incorporated arrangements set out in the 24 Articles of Association of the company which are 25 designed to ensure the editorial independence of the</p> <p style="text-align: center;">Page 11</p>
<p>1 investigations. They further require it to review 2 existing compliance systems within News International 3 and to recommend and oversee the implementation of new 4 policies, practices and systems to create an updated and 5 robust governance and compliance structure for 6 News International.</p> <p>7 The committee has appointed Linklaters, a leading 8 firm of solicitors with wide experience of investigation 9 work, to carry out a full internal investigation at 10 News International and the newspapers. That 11 investigation is being carried out under protocols 12 agreed with the Metropolitan Police and relevant 13 material is being passed to the police as and when 14 required. The committee has also appointed Olswangs, 15 a leading firm of media lawyers, to advise on best 16 practice systems of governance.</p> <p>17 Thirdly, News International is not sitting still and 18 waiting for the outcome of those reviews. A new chief 19 executive, Mr Tom Mockridge, was appointed in July this 20 year following the resignation of Rebekah Brooks. 21 Mr Mockridge has previously worked in New Zealand, 22 Australia, Hong Kong and Italy, but he has not been 23 based in the UK before, so he is a fresh pair of hands. 24 Under his guidance, close attention is being given to 25 compliance matters. Amongst other things, a hard copy</p> <p style="text-align: center;">Page 10</p>	<p>1 Times and of the Sunday Times. Under these 2 arrangements, Times newspapers Holdings Limited has six 3 independent national directors. Amongst their functions 4 is that of resolving any disputes between the editors 5 and the company. The independent national directors 6 remain in place, and their role is in no way diminished 7 by the corporate governance improvements which are being 8 made.</p> <p>9 Fourthly, civil claims for damages have been raised 10 against News Group Newspapers in consequence of phone 11 hacking. Some of these claims have resulted in 12 proceedings being issued and the claims are being 13 managed as a group by Mr Justice Vos in the High Court. 14 We are trying to take a sensible and constructive 15 approach to those claims, making admissions and 16 concessions where appropriate, and a number of such 17 claims have been settled either before or after 18 proceedings have been begun.</p> <p>19 In addition, and in order to make it easier for 20 people to obtain compensation for admitted claims, 21 News Group has established a compensation scheme to pay 22 out amounts determined by Sir Charles Gray, a former 23 High Court judge, as being equal to what a court would 24 award with 10 per cent added on top.</p> <p>25 By taking these steps, News International intends to</p> <p style="text-align: center;">Page 12</p>

<p>1 ensure that what happened at the News of the World will 2 not happen again, and that fair compensation will be 3 paid to those who suffered from it. 4 I am now going to turn from the past and indeed the 5 present to the future. 6 LORD JUSTICE LEVESON: Just before you do, you've mentioned 7 a number of steps that have been taken -- indeed, the 8 independent directors have submitted a statement to the 9 Inquiry, as you probably are aware. 10 MR DAVIES: Yes. 11 LORD JUSTICE LEVESON: And you've mentioned the work being 12 undertaken by Lord Grabiner with the assistance of two 13 firms of solicitors. In the same way that I make it 14 clear that I've told the industry as a whole that 15 I would welcome any suggestions that can work for 16 everyone, including the public -- and I have made 17 similar comments during the course of the directions 18 hearing -- I welcome Lord Grabiner's assistance to such 19 extent as he is able to provide it, and I am very 20 pleased to hear that he is tasked also to assist the 21 Inquiry. This is a job which all of us have to do, 22 whatever our backgrounds in connection with the issues 23 that have given rise to it. 24 MR DAVIES: Yes. We had noted what you had said previously 25 and also what you said yesterday morning about welcoming</p> <p style="text-align: center;">Page 13</p>	<p>1 obtaining or disclosing personal data without permission 2 or justification, and we have the common law of privacy, 3 developed by the courts since the Naomi Campbell case in 4 2004, which gives a right to sue for damages for 5 invasions of privacy. The press is subject to all those 6 laws and many more, as are all citizens. 7 That the law applies to the press is easily enough 8 seen from the phone hacking cases. Phone hacking is 9 a criminal offence under the Regulation of Investigatory 10 Powers Act 2000. I am not going to go into the 11 interpretation of section 2 of that act, which was 12 touched on yesterday, but the Inquiry will be aware that 13 phone hacking is, of course, an offence also under the 14 Data Protection Act. So even if there is any doubt 15 about the offence under RIPA, there is undoubtedly one 16 under the Data Protection Act. 17 If there was any doubt in the popular mind, or 18 indeed that of the press, that phone hacking was 19 criminal, it was dispelled when Mr Mulcaire and 20 Mr Goodman were arrested and pleaded guilty in 2006 and 21 when they were both sentenced to terms of immediate 22 imprisonment in February 2007. Those convictions and 23 sentences do appear to have had a salutary effect. It 24 was notable that when speaking at the Inquiry's seminar 25 on 12 October this year, the current</p> <p style="text-align: center;">Page 15</p>
<p>1 assistance from the industry, and I know that that has 2 been taken on board and I hope that it will prove 3 fruitful. Indeed, I will say a little bit about that 4 now. 5 The position of News International is that it 6 supports the principle of independent self-regulation 7 for the press. It considers that the PCC can be 8 improved, it will still not be perfect, but the 9 alternatives are not perfectly either, and we would 10 suggest suffer from much greater disadvantages. We have 11 addressed this area in our written opening submissions, 12 and I am not going to repeat now what is said there, but 13 there are three points which I wish to highlight. 14 First of all, as Mr Jay acknowledged yesterday, the 15 press is not above the law. Like all other citizens, 16 it's constrained by both the civil and the criminal law 17 of the land, and over the last 15 years or so, the law 18 of the land has developed to provide protection in many 19 of the areas where there has been concern over press 20 behaviour. 21 We now have the Protection from Harassment Act 1997, 22 which gives protection from harassment and makes it both 23 a criminal offence and gives rise to a civil claim for 24 damages. We have the Data Protection Act, which 25 protects personal data and provides criminal offences</p> <p style="text-align: center;">Page 14</p>	<p>1 Information Commissioner, Christopher Graham, said that 2 in his two and a half years as the 3 Information Commissioner, he had not seen a single case 4 of an offence under section 55 of the Data Protection 5 Act which involved the press. That is the section which 6 makes it a criminal offence to obtain or disclose 7 personal data without consent or justification. 8 I am not going to give any guarantees that there was 9 no phone hacking by or for the News of the World after 10 2007. No doubt that will be explored during the 11 evidence, and we noted that Mr Jay said the police 12 thought the last instance was in 2009. Nonetheless, it 13 does look as if lessons were learnt when Mr Goodman and 14 Mr Mulcaire went to jail. If phone hacking continued 15 after that, it was not, as it appears, what Mr Jay 16 described as the thriving cottage industry which existed 17 beforehand. 18 The lessons for the Inquiry, we would suggest, are 19 that the ordinary law of the land protects against phone 20 hacking both by making it a criminal offence and by 21 giving a civil claim. The Inquiry should, we suggest, 22 be somewhat wary of making recommendations designed to 23 fight the last war, rather than the next one. 24 The second point I want to make concerns not, 25 I hope, a battleground, but certainly the terrain the</p> <p style="text-align: center;">Page 16</p>

<p>1 Inquiry needs to cover, and particularly the Internet or 2 the web or the blogosphere or whatever you wish to call 3 it. 4 As I am speaking now, it is still just possible to 5 identify fairly uncontroversially the constituents of 6 the press. We can all reel off the names of the 7 well-known national papers, most of us can probably also 8 name our local regional papers and maybe some other 9 regional papers, and most, if not all of them, are 10 represented at this Inquiry. 11 But if I were to list the papers by name, I would 12 swiftly have to add the reference to their websites, 13 because their websites have become part of the package 14 and the speculation now is not as to whether one of the 15 established papers will become an Internet-only 16 publication; it is as to which will be the first to take 17 that route, and by doing so, to join the influential 18 news sites which already exist solely on the Internet. 19 We are, therefore, already at the stage where the press 20 cannot be sensibly defined without reference to the 21 existence of titles which are or soon will be published 22 solely on the Internet. 23 What that means for this Inquiry is that any 24 regulatory solution which it recommends must tackle the 25 question of how to regulate publication on the Internet.</p> <p style="text-align: center;">Page 17</p>	<p>1 MR DAVIES: Absolutely. It is a daunting problem and 2 I don't have a sparkling and brilliant solution to it in 3 my pocket which I am about to pull out. 4 LORD JUSTICE LEVESON: I'm sure Lord Gribner will provide 5 us with one. 6 MR DAVIES: I shall look forward to it. 7 There are two things I would say about that. One is 8 there is the related problem of cost. The Inquiry 9 should, so far as at all possible, avoid imposing costs 10 on the printed press which are not shared by its 11 competitors which are not in print, because to do that 12 risks achieving the destruction of the printed press 13 which is sought to be regulated. 14 The other point I would making is that it may be 15 right that it is easier to regulate at least parts of 16 the Internet through a self-regulatory system because 17 you have to be much less precise in defining your terms 18 with a self-regulatory system, and it is endlessly and 19 swiftly adaptable. Once one passes a statute that says, 20 "People with the following characteristics have to be 21 regulated", then it is necessary to define somehow which 22 parts of the Internet you are going to regulate and 23 which are outside. You have to draw a line somewhere 24 between a blogger and a professional journalist, a task 25 which in itself is almost impossible.</p> <p style="text-align: center;">Page 19</p>
<p>1 That is a problem which makes herding cats look like 2 a nursery school exercise, but it is a problem which 3 cannot be simply ignored. It cannot be ignored because 4 there can be no fairness, logic or coherence in a system 5 which regulates a publisher or a journalist who 6 publishes on paper, but shrugs its shoulders as soon as 7 he or she chooses to publish on the Internet instead, 8 and it cannot be ignored because the fragile economics 9 of the printed press should not be disadvantaged by 10 a regulatory cost which does not bear equally on its 11 Internet competitors. 12 LORD JUSTICE LEVESON: That's an easy problem to state, 13 Mr Davies, and if it matters, I entirely agree with you, 14 but I'm listening very carefully to what you're just 15 about to suggest. 16 MR DAVIES: Well, I and my clients are very well aware that 17 it is a much easier problem to state than it is to 18 solve. 19 LORD JUSTICE LEVESON: Because it's not just a question of 20 solving it in relation to, say, one of our local 21 nationals, if you'll pardon that odd use of language, 22 simply saying, "Right, we'll stop printing, we'll just 23 go on the Internet", because the Internet provides 24 access to news material which is published anywhere in 25 the world.</p> <p style="text-align: center;">Page 18</p>	<p>1 LORD JUSTICE LEVESON: That's a line we're going to have to 2 draw anyway, because one could talk about even journals 3 such as the Huffington Post, but that creates different 4 problems to those that might be created by a blogger 5 such as Guido Fawkes, or a blogger who simply now can 6 communicate with a much larger audience than previously 7 was the case. 8 MR DAVIES: Indeed so, and I'm afraid I'm simply stringing 9 out problems, but one also has the case of a blog which 10 is normally read by 25 people and then, for some reason 11 or other, it catches the zeitgeist and it suddenly has 12 hundreds of thousands of readers. How is one to treat 13 that, inside the net or outside the net? These problems 14 are, I'm afraid, very intractable. 15 LORD JUSTICE LEVESON: Yes. 16 MR DAVIES: The third point I wanted to make is that the 17 constitutional principle that the press should be free 18 of government regulation is a very important one. 19 Governments have a poor record of resisting temptation 20 when it comes to regulating the press. As was pointed 21 out at the seminars, one only has to go to Italy or 22 Hungary now or less than 200 years back in our own 23 history to see that. I think as a matter of history, 24 after the massacre at Peterloo less than 200 years ago, 25 the government introduced repressive measures applying</p> <p style="text-align: center;">Page 20</p>

<p>1 to the press and there were a number of trials for 2 seditious libel as well.</p> <p>3 LORD JUSTICE LEVESON: I'm very grateful to you for taking 4 me back to 1643 in your written submissions and 5 I understand the lesson, but I am very keen to unpick 6 one thing at some stage, Mr Davies, and that's what we 7 mean by "regulation". It strikes me that at the moment, 8 a lot of people are talking about statutory regulation 9 as if it is binary. There is either statutory 10 regulation on the one hand or self-regulation on the 11 other, and I'm not sure that the boundary between the 12 two isn't very, very much more blurred. Indeed, some of 13 the commentary about systems which could be put in place 14 might be assisted by the statutory, for example, 15 recognition of a self-regulatory body, as happens in 16 other industries.</p> <p>17 So I would be very keen to widen the debate from the 18 binary discussion of "statutory regulation bad, 19 self-regulation good" to understanding what is meant by 20 "statutory regulation", whether everybody is talking 21 about the same thing.</p> <p>22 MR DAVIES: Yes. I think the concern that we have is very 23 much focused on anything which provides a mechanism for 24 governmental control over the press.</p> <p>25 LORD JUSTICE LEVESON: Well, subject to anything that</p> <p style="text-align: center;">Page 21</p>	<p>1 need for a free press now is as great, if not greater, 2 than it has ever been.</p> <p>3 LORD JUSTICE LEVESON: Yes. Don't let me in any sense, by 4 anything I say, limit or cause you to not say something 5 you want to say, for this reason: this is unlike any 6 other judicial hearing. By the very fact of the way 7 this Inquiry is being conducted, this is a debate which 8 is going on in confines that are much broader than this 9 room and with me, so I don't want, in any sense, people 10 to limit what they want to say simply because they think 11 it will irritate me because I've already said I agree 12 with them. They can limit them a bit but not entirely.</p> <p>13 MR DAVIES: With both parts of that statement in mind, let 14 me simply say that we consider that the need for a free 15 press is very great at the moment. Not so long ago, 16 spin doctors were unheard of. We now have an industry 17 which exists to portray events in the manner desired by 18 its clients, whether they are the government, business 19 or pressure groups. Struggling to disentangle the facts 20 from the spin and to explain the world to its readers is 21 the job of the press, and it is a harder job now than 22 it -- well, certainly no easier than it has ever been.</p> <p>23 The British press, including the Times, the 24 Sunday Times and the Sun, have a long and fine record of 25 reporting the news, of uncovering scandals and of</p> <p style="text-align: center;">Page 23</p>
<p>1 anybody else may say, you're pushing, in that regard, at 2 an absolutely open door. Of course, I'm only two days 3 in -- that's not strictly true; I'm three months in -- 4 but I think I said that right at the very beginning and 5 I can't believe that anything will happen that will 6 change my mind about that, but that's only half the 7 issue, as I'm trying to investigate.</p> <p>8 MR DAVIES: Yes. As I said, we had noted the remarks you've 9 made more than once now.</p> <p>10 LORD JUSTICE LEVESON: Yes. Nobody seems to pay attention 11 to them because they all think that I'm going to do 12 something else.</p> <p>13 MR DAVIES: I think one should not conclude from the absence 14 of a shining perfect solution in my pocket that people 15 are not paying attention to remarks from yourself or 16 from the Inquiry in general.</p> <p>17 LORD JUSTICE LEVESON: Yes, well.</p> <p>18 MR DAVIES: As I said, and as I think we've agreed, it is 19 a difficult problem and we haven't come up with 20 a perfect solution yet. We will not hold back if we do.</p> <p>21 LORD JUSTICE LEVESON: I'm very grateful for that 22 indication.</p> <p>23 MR DAVIES: Yes.</p> <p>24 Despite the open door which has been helpfully 25 mentioned, I should emphasise that we consider that the</p> <p style="text-align: center;">Page 22</p>	<p>1 entertaining their readers. Tragically, the 2 News of the World managed to plumb both the depths and 3 the heights. The depths, I need hardly say, are taken 4 up by phone hacking. The heights are well illustrated 5 by the remarkable piece of investigatory journalism 6 which exposed very recently the willingness of certain 7 international cricketers to take money to fix events in 8 cricket matches and led to the convictions of three 9 cricketers. That investigation was vital to the future 10 integrity of professional cricket and to the trust of 11 the tens of millions who follow the game. It was an 12 investigation which no private citizen could have taken 13 on and which no government organ or professional body 14 showed any inclination to take on. Indeed, the police 15 frankly said after the convictions that, understandably, 16 they have higher priorities than cleaning up 17 professional cricket and that had the case not been 18 handed to them on a plate, they would not have pursued 19 it. This was a scandal that would have run and run if 20 the press, in the form of the News of the World, as it 21 happens, had not intervened.</p> <p>22 There are many other notable examples of 23 investigative journalism, from thalidomide to MPs' 24 expenses and the link between Arthur Scargill and the 25 Libyan regime which Mr Jay referred to yesterday as</p> <p style="text-align: center;">Page 24</p>

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<p>1 having been exposed by the Sunday Times and explained by 2 Mr Witherow in his recent article. Despite those 3 successes, the question that should perhaps be asked is 4 that proposed by the editor of the Times, James Harding, 5 in his statement to the Inquiry: not "why does the press 6 know so much?" but "why does it know so little?"</p> <p>7 Why did it know so little about weapons of mass 8 destruction or the lack of them in Iraq? Why did it not 9 forewarn of the banking crisis? Why did it not fully 10 appreciate the dysfunction between 10 and 11 11 Downing Street during the last government? Why did 12 it not see the recent riots coming? It may be that what 13 we need as citizens is for the press to have not less 14 freedom but more. So our plea is for the press not to 15 be over regulated. It's not a plea for it to be above 16 the law.</p> <p>17 In the course of this Inquiry, we cannot and will 18 not hide from the worst that has gone on in the past but 19 we hope to be able to assist in plotting a course which 20 will permit a free and vigorous press to flourish with 21 integrity in the future.</p> <p>22 Now, that said, and as I have said I think twice 23 now, I don't have a shining example of a perfect 24 regulatory system in my pocket, but that is a matter 25 which we are thinking about very hard, and we will do</p> <p style="text-align: center;">Page 25</p>	<p>1 mechanisms for seeking relief in civil justice today, 2 with all the problems of access to justice about which 3 everybody in this room will be extremely familiar, don't 4 themselves cast a different light on what we have to do 5 to provide a mechanism that is efficient, effective, 6 fair and cheap, both to those who wish to complain and 7 indeed the industry.</p> <p>8 I have said outside this room that ten, 15 years 9 ago, the problems about libel were very much those of 10 victims who could not get legal aid and therefore to 11 take on the big beasts of the press was a difficult 12 problem. Now it might be that the complaint has moved 13 slightly differently because conditional fees have meant 14 a complaint now from the press that they can't afford to 15 contest litigation because the cost of doing so, once 16 one adds up the consequence of conditional fee, itself 17 becomes ruinous.</p> <p>18 I can't solve the problems of access to justice -- 19 I have quite enough on my plate as it is -- but one of 20 the issues might be some mechanism to permit a speedier, 21 effective and sensible mechanism for all to use and for 22 all to take the advantage of, which does not involve the 23 panoply that otherwise exists in this building, 24 available through the High Court and the traditional 25 litigation route.</p> <p style="text-align: center;">Page 27</p>
<p>1 our best to assist the Inquiry in conjunction, I hope, 2 with the rest of the industry in that respect.</p> <p>3 LORD JUSTICE LEVESON: I'm very grateful. Of course, I've 4 mentioned the binary between statutory regulation and 5 self-regulation. There's another binary as well, and 6 that is between what is frankly contrary to the criminal 7 law --</p> <p>8 MR DAVIES: Yes.</p> <p>9 LORD JUSTICE LEVESON: -- and that which isn't contrary to 10 the criminal law, but which, as you readily conceded, 11 breaches fundamental ethical considerations of which the 12 recent example last week is a good one. So one can't 13 just leave it to the criminal law.</p> <p>14 MR DAVIES: No, indeed, and there is the civil law as well, 15 and there are perhaps difficult issues as to how far 16 surveyance transgresses that.</p> <p>17 LORD JUSTICE LEVESON: I agree. That's the point. But you 18 agreed that it's inappropriate.</p> <p>19 MR DAVIES: Yes.</p> <p>20 LORD JUSTICE LEVESON: It's unethical, whatever words you 21 want to use.</p> <p>22 MR DAVIES: Yes.</p> <p>23 LORD JUSTICE LEVESON: Query whether it fits into some 24 invasion of a civil law right, and on top of that, one 25 has to graft the additional problem whether the</p> <p style="text-align: center;">Page 26</p>	<p>1 I merely put it on the table, as I have done, 2 because as you identify the problems, you might as well 3 throw that one into the mix as well.</p> <p>4 MR DAVIES: Yes. That is also a problem which has crossed 5 our minds, and I'm afraid it's also in the camp of 6 problems to which I don't have a shining solution in my 7 pocket, and we had noted with a degree of horror that 8 I think one of the seminars was told by an ombudsman 9 from the financial services ombudsman's brigade that 10 their total budget was something over 100 million 11 a year. As you know, the PCC's budget is, I think, just 12 under 2. So there are enormous difficulties there.</p> <p>13 LORD JUSTICE LEVESON: I understand the cost consequences, 14 yes.</p> <p>15 MR DAVIES: There is also a philosophical and constitutional 16 question, going back to the earlier problem, as to 17 whether the press ought to be limited beyond the limits 18 which apply to the ordinary citizen. If one does that, 19 one is saying that freedom of the press is somehow 20 narrower than freedom of speech and that is a question 21 in itself.</p> <p>22 LORD JUSTICE LEVESON: I take that point.</p> <p>23 MR DAVIES: So I apologise if I have done more to sketch the 24 problems than to provide the solutions but --</p> <p>25 LORD JUSTICE LEVESON: Well, the problems are somewhat</p> <p style="text-align: center;">Page 28</p>

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<p>1 easier to state than the solutions to find.</p> <p>2 MR DAVIES: Having done that, unless there's anything else</p> <p>3 I can add --</p> <p>4 LORD JUSTICE LEVESON: No, Mr Davies, thank you very much.</p> <p>5 Thank you.</p> <p>6 Mr Caplan?</p> <p>7 Opening submissions by MR CAPLAN</p> <p>8 MR CAPLAN: Good morning. May I just introduce the team</p> <p>9 that's representing Associated Newspapers. My name is</p> <p>10 Jonathan Caplan. I'm assisted by Sarah Palin as junior</p> <p>11 counsel and I have also sitting next to me Elizabeth</p> <p>12 Hartley, the head of editorial legal at</p> <p>13 Associated Newspapers Limited. We represent</p> <p>14 Associated Newspapers. Their principal publications, as</p> <p>15 you will know, are the Daily Mail, the Mail on Sunday,</p> <p>16 Mail Online and the Metro.</p> <p>17 At this stage, we would wish to make some rather</p> <p>18 broadbrush comments dealing with some of the issues</p> <p>19 raised by your terms of reference and raised by Mr Jay</p> <p>20 yesterday. We obviously hope, during the course of the</p> <p>21 Inquiry, to make more detailed submissions and to assist</p> <p>22 you as fully as we can in relation to the kind of issues</p> <p>23 which you have just been mentioning.</p> <p>24 We make perhaps no apologies for going back to the</p> <p>25 17th century because the British newspaper industry has</p> <p style="text-align: center;">Page 29</p>	<p>1 without conducting an extensive fact-finding exercise,</p> <p>2 which in part may be precluded by current police</p> <p>3 investigations? Even then, are we just talking about</p> <p>4 the practices of some journalists and one organisation?</p> <p>5 How do they translate to the practices of the press as</p> <p>6 a whole? The press is not a single homogenous body and</p> <p>7 obviously one will need to look carefully at the</p> <p>8 evidence that is called before you to examine that issue</p> <p>9 with care.</p> <p>10 Also, insofar as you are called upon to look, as you</p> <p>11 clearly are, at the issue of ethics, is that something</p> <p>12 that can be considered totally from an objective</p> <p>13 perspective or does it in part depend upon who you are</p> <p>14 and where you stand? Do you believe in a strict right</p> <p>15 to privacy? Do you regard public interest as an</p> <p>16 overworked escape clause for investigative journalists?</p> <p>17 If you choose to be in the public eye, then your answers</p> <p>18 to those questions may be very different to those of the</p> <p>19 readers of many newspapers.</p> <p>20 When your terms of reference seek "recommendations</p> <p>21 for a new, more effective policy and regulatory regime",</p> <p>22 that, of course, should not be taken as an indication</p> <p>23 that the existing model of the Press Complaints</p> <p>24 Commission is broken or that self-regulation is</p> <p>25 incapable of being beefed up in significant ways.</p> <p style="text-align: center;">Page 31</p>
<p>1 a proud history of some 350 years, going back to the</p> <p>2 first English newspaper in the form of the Oxford</p> <p>3 Gazette. Since then, there has been a rich and diverse</p> <p>4 array of publications, both nationally and regionally,</p> <p>5 usually offering a wide and stimulating range of</p> <p>6 perspectives, all deciding independently what to report,</p> <p>7 how to report it, according to differing social and</p> <p>8 political stances. They all aim to connect with and</p> <p>9 reflect their national or local readerships, which of</p> <p>10 course may be in millions, they may be in hundreds, and</p> <p>11 they all cater to vastly differing communities and</p> <p>12 lifestyles.</p> <p>13 Sir, your terms of reference are of fundamental</p> <p>14 importance not just to proprietors and journalists but</p> <p>15 obviously to our democratic way of life. No one</p> <p>16 involved in this Inquiry or outside of this room could</p> <p>17 sensibly doubt that a free press which is independent of</p> <p>18 government is essential to any democracy. But your</p> <p>19 terms of reference, if we may say so, raise broad and in</p> <p>20 some respects imprecise issues.</p> <p>21 For example, what is meant by "the culture of the</p> <p>22 press" and can you properly define that culture? We</p> <p>23 raise that as a question. How is it possible to</p> <p>24 determine what the practices of the press are -- or are</p> <p>25 we in this Inquiry, in truth, talking about "were" --</p> <p style="text-align: center;">Page 30</p>	<p>1 This Inquiry is the fourth into the press since the</p> <p>2 Second World War. The first Royal Commission on the</p> <p>3 Press was appointed in 1947, as you know, in response to</p> <p>4 public and parliamentary criticism of declining press</p> <p>5 standards and fears of monopolies with regard to</p> <p>6 ownership. It recommended the establishment of the</p> <p>7 General Council of the Press, which was self-regulating.</p> <p>8 The second Royal Commission on the Press was chaired</p> <p>9 by Lord Shawcross and reported in 1962. It recommended</p> <p>10 a new constitution for the industry body, which changed</p> <p>11 its name to the Press Council.</p> <p>12 The third Royal Commission on the Press, under</p> <p>13 Lord MacGregor, reported in 1977 and made a detailed</p> <p>14 study of the Press Council, and one of its</p> <p>15 recommendations was that the council should publish</p> <p>16 a written code for journalists.</p> <p>17 Finally, in 1990, the report of the Committee on</p> <p>18 Privacy, chaired by David Calcutt, Queen's Counsel,</p> <p>19 recommended that the Press Council be disbanded and that</p> <p>20 a new authoritative, independent and impartial body be</p> <p>21 established, to be called the Press Complaints</p> <p>22 Commission.</p> <p>23 That potted history demonstrates that concerns about</p> <p>24 press standards and stories -- indeed, yesterday Mr Jay</p> <p>25 took us back to Warren and Brandeis in the Harvard Law</p> <p style="text-align: center;">Page 32</p>

<p>1 Journal at the end of the last century --</p> <p>2 LORD JUSTICE LEVESON: You have to add Sir David Calcutt's</p> <p>3 second go at it.</p> <p>4 MR CAPLAN: Indeed. He had two reports.</p> <p>5 LORD JUSTICE LEVESON: But the second one suggested</p> <p>6 a different solution entire which wasn't adopted.</p> <p>7 MR CAPLAN: No, it wasn't. He was in favour of abandoning</p> <p>8 self-regulation.</p> <p>9 But that potted history demonstrates that concerns</p> <p>10 about press standards and concerns about the kind of</p> <p>11 stories that the press wrote are nothing new, but on</p> <p>12 each occasion, with the exception of David Calcutt's</p> <p>13 second report, statutory regulation -- and by that</p> <p>14 I mean, obviously, the imposition of</p> <p>15 a government-appointed body -- has been seen as a step</p> <p>16 too far.</p> <p>17 We need, we would respectfully suggest, to be</p> <p>18 clearly aware as to how we have all arrived at this</p> <p>19 point in the history of the British press before yet</p> <p>20 another judicial Inquiry with the far-reaching powers</p> <p>21 which are given to you, sir. As the editor in-chief,</p> <p>22 Mr Paul Dacre, of the Daily Mail said a month ago at one</p> <p>23 of the Inquiry's seminars, the banks didn't collapse</p> <p>24 because of the News of the World and a nation didn't go</p> <p>25 to war. We are here because the employees or agents of</p> <p style="text-align: center;">Page 33</p>	<p>1 public interest and the press. The point we make is</p> <p>2 that we would not be here today but for the activities</p> <p>3 or alleged activities of the News of the World.</p> <p>4 LORD JUSTICE LEVESON: Yes, that may be right, and I was</p> <p>5 present when Mr Dacre spoke so forcefully on this topic</p> <p>6 at the seminar. I'm equally conscious that, because of</p> <p>7 the police investigation, there are enormous limits on</p> <p>8 what I said, I think, quoted yesterday at the Society of</p> <p>9 Editors conference, about the cart being before the</p> <p>10 horse. I readily recognise the analogy, which is mine.</p> <p>11 But in one sense, that might help us all, because it</p> <p>12 means that we won't be focusing on the microscopic but</p> <p>13 can try and take a broader snapshot of what's going on,</p> <p>14 to try and make it work better for everyone.</p> <p>15 MR CAPLAN: Yes.</p> <p>16 LORD JUSTICE LEVESON: If it works better for the press,</p> <p>17 that's fine, but it has to be everyone, as I've said</p> <p>18 several times.</p> <p>19 MR CAPLAN: Yes, and I'm going to come in a moment, sir,</p> <p>20 to --</p> <p>21 LORD JUSTICE LEVESON: I'm not trying to take you out of</p> <p>22 your line.</p> <p>23 MR CAPLAN: The debate is a far-reaching one which your</p> <p>24 Inquiry is commencing, and we wish to participate fully</p> <p>25 in it, as I'm sure do other people in this room and</p> <p style="text-align: center;">Page 35</p>
<p>1 News International have listened to the voicemail</p> <p>2 messages on other people's mobiles and may have paid</p> <p>3 serving police officers for information. That's</p> <p>4 a matter under investigation.</p> <p>5 The rumour mill is that other journalists working</p> <p>6 for other proprietors may also have acted unethically or</p> <p>7 illegally, and the flames have been fanned to some</p> <p>8 extent by politicians, perhaps because of their own</p> <p>9 agenda of holding the press to account for so</p> <p>10 comprehensively exposing the scandal of parliamentary</p> <p>11 expenses.</p> <p>12 We have still to see a large amount of the evidence,</p> <p>13 obviously, which has been given to this Inquiry, and we</p> <p>14 look forward to seeing it and to participating in the</p> <p>15 hearings and the debate which you have.</p> <p>16 LORD JUSTICE LEVESON: Mr Caplan, I understand the point</p> <p>17 that had it not been for hacking, and particularly for</p> <p>18 what was revealed at the very end, this may never have</p> <p>19 happened. But it wouldn't be a fair characterisation of</p> <p>20 the position, would it, to suggest that hacking is alone</p> <p>21 in the issues that actually have generated public</p> <p>22 concern?</p> <p>23 MR CAPLAN: No. I mean, we know that there has been</p> <p>24 a considerable amount of public concern in relation to</p> <p>25 the limits of the right to privacy and the issues of</p> <p style="text-align: center;">Page 34</p>	<p>1 outside of this room, and it is a debate that is</p> <p>2 demonstrably worth having and an important debate to</p> <p>3 all. I don't wish to, in any sense, detract from that.</p> <p>4 The point I was seeking to make is in relation to</p> <p>5 evidence of malpractice or potential evidence. We</p> <p>6 clearly are aware, all of us, of the activities of</p> <p>7 Mr Mulcaire, which, as far as we know, ended in the</p> <p>8 middle of 2006. I'm going to deal with</p> <p>9 Operation Motorman, which Mr Jay referred to yesterday,</p> <p>10 and the investigation in 2003. We obviously will have</p> <p>11 to see what evidence is placed before the Inquiry in</p> <p>12 relation to other matters of complaint.</p> <p>13 The point I simply make is that we need to be</p> <p>14 clearly aware that any recommendations or restrictions</p> <p>15 which come out of this Inquiry are not simply introduced</p> <p>16 on the basis of historic transgressions which no longer</p> <p>17 occur, and we will obviously consider the evidence which</p> <p>18 is placed before your Inquiry, and that there is some</p> <p>19 kind of systemic problem.</p> <p>20 Sir, can I just state the position as far as</p> <p>21 Associated Newspapers is concerned?</p> <p>22 LORD JUSTICE LEVESON: Before you do that, let me just pick</p> <p>23 up on that which you've said. The analogy that Mr Jay</p> <p>24 mentioned yesterday of Dr Shipman is not utterly</p> <p>25 inapposite. Nobody at all suggests that there are lots</p> <p style="text-align: center;">Page 36</p>

<p>1 of doctors going around doing what Dame Janet Smith 2 found Dr Shipman had done, but the opportunity was taken 3 to improve the system. Of course, one has to keep in 4 mind what is vital, particularly in the context of this 5 Inquiry, but to say that one has to look only to the 6 future doesn't mean to say that one should not take 7 advantage of where we are to try to improve for all, and 8 that's really another way of saying what I just said 9 a moment ago.</p> <p>10 MR CAPLAN: Thank you.</p> <p>11 Can I just state quite clearly the position of my 12 clients, Associated Newspapers, and it is this: it 13 condemns the practice of phone hacking, and so far as it 14 is aware, no journalist at Associated Newspapers has 15 engaged in phone hacking. It does not bribe police 16 officers, and in particular, it condemns the shameful 17 practice of hacking the mobile phones of the victims of 18 crime or of their families.</p> <p>19 Sir, the Inquiry is in progress, and as I've said, 20 having regard to the improvements which you have just 21 referred to, sir, which hopefully will come from this 22 Inquiry, and the huge ramifications for our national 23 press which are likely to result from your 24 recommendations, Associated Newspapers is committed to 25 assisting you as fully as it can, as a core participant.</p> <p style="text-align: center;">Page 37</p>	<p>1 their readers, and it is their readership's taste and 2 attitudes and whether they are met or not that determine 3 the commercial viability of a newspaper.</p> <p>4 Having said that, of course, even in the middle 5 market, newspapers at times need to be gossipy and 6 sensational if they are to attract large circulations. 7 Stories about celebrities and the course of human 8 relationships are a part of that attraction and they do 9 enable space to be provided elsewhere in the newspaper 10 for more serious articles providing analysis and comment 11 about perhaps more important issues of the day. But the 12 aim is both to entertain and critically to engage.</p> <p>13 We must also remember that we live in a country 14 which is one of the major centres of the arts and 15 entertainment industry. Many people have become 16 celebrities and gone from relative obscurity to 17 international fame and wealth because of the vibrant 18 press which we have here, which has been able to capture 19 the imagination of its readership through stories about 20 their personal lives which are usually informative as 21 opposed to being intrusive, as well as stories about 22 their artistic talent.</p> <p>23 With news and investigative journalism, those 24 stories, of course, are not plucked full grown from the 25 trees. They very often have somebody who is wealthy and</p> <p style="text-align: center;">Page 39</p>
<p>1 We will do all that we can in a constructive way. We 2 look forward to participating in the debate which this 3 Inquiry will stimulate.</p> <p>4 Associated Newspapers strongly believes in 5 maintaining a strong, ethical -- and I stress that 6 word -- and viable press which is equipped for the 7 significant challenge of being both the eyes and ears of 8 the public and ultimately its voice. Of course, there 9 is always room for improvement and for better practices.</p> <p>10 We do wish, however, to stress that press standards 11 have vastly improved over the last 20 years under the 12 Press Complaints Commission and under the Editors' Code 13 of Conduct. It's been mentioned before, but we do 14 stress that most journalists are hard-working, 15 conscientious and honest, and they passionately believe 16 in what they do. We are anxious that the allegations of 17 phone hacking should not be allowed to besmirch the 18 profession as a whole.</p> <p>19 This point can be made in another way, and that is 20 this: the Daily Mail and the Mail on Sunday are 21 commercially successful, we submit, precisely because 22 they connect with their readership and their values, and 23 that readership will stop buying those newspapers if 24 they feel that they cannot trust its integrity or 25 accuracy. Newspapers are held to account every day by</p> <p style="text-align: center;">Page 38</p>	<p>1 powerful and does not want that story to be printed, and 2 newspapers therefore require considerable resources and 3 resourcefulness both to investigate and then to 4 establish the truth and accuracy of what they have 5 printed, and they need to be commercially successful to 6 perform that role.</p> <p>7 As you've heard only moments ago, the press, of 8 course, is increasingly having to compete with the 9 Internet and with other digital news platforms which are 10 often largely unregulated. The press is highly 11 regulated, and you're well aware of the laws covering 12 data protection, libel, the new Bribery Act, privacy, 13 contempt of court, harassment, regulation of 14 investigatory powers and official secrets. Therefore 15 the press is only free, of course, to the extent that it 16 is not already prescribed by law.</p> <p>17 Sir, can I turn to Operation Motorman, which we do 18 regard as an important matter, because a certain amount 19 of comment has been made following the police 20 investigation in 2003 and the activities of the Inquiry 21 agent Stephen Wittamore, and following the findings of 22 the Information Commissioner in the two reports, "What 23 price privacy?" published in May 2006 and "What price 24 privacy now?" published in December of that year. The 25 reports drew attention to the extensive use of enquiry</p> <p style="text-align: center;">Page 40</p>

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<p>1 agents to search for personal data by not just 2 journalists but by organisations in many different areas 3 of our society.</p> <p>4 The last few years since the publication of those 5 reports have seen a growing awareness, we suggest, on 6 the part of all sections of society -- government, 7 business and the media -- regarding the importance of 8 data protection. In fact, newspapers are by no means 9 the worst offenders and no penalties have so far been 10 awarded against newspapers under the Data Protection 11 Act.</p> <p>12 Yesterday, Mr Jay referred to Operation Motorman, 13 and we are keen to return to it because in our 14 submission it is in no way to be compared to the conduct 15 of phone hacking. It is especially important to draw 16 a clear distinction between phone hacking, which is the 17 illegal interception of private voicemails, and the kind 18 of conduct which was the subject of the 19 Information Commissioner's reports.</p> <p>20 The activity which Stephen Wittamore was hired to 21 undertake almost a decade ago was primarily to obtain 22 addresses and telephone numbers, most of which -- not 23 all of which but most of which -- could legally have 24 been obtained if the individual had had the time to 25 research it. His assistance was required, as far as</p> <p style="text-align: center;">Page 41</p>	<p>1 in evidence to you that it operates its titles by 2 respecting and observing the law and regulatory 3 requirements and by applying the Editors' Code. It 4 invests in the training of its reporters, requiring 5 continuing professional development in significant 6 changes in law, such as the new Bribery Act.</p> <p>7 All journalists employed by Associated are required 8 to comply with the Editors' Code and to abide by the 9 highest professional standards. Associated aims to set 10 strong ethical culture within each title and it closely 11 monitors payments to third parties for news and 12 information. It has and is supported by a strong 13 in-house legal team, and by specialist solicitors and 14 counsel.</p> <p>15 That is not to say, of course, that Associated does 16 not make mistakes of judgment or simply mistakes. 17 Publishing to a deadline is a process that involves risk 18 and it can be said that a newspaper that never sets out 19 to expose itself to risk is not doing its job.</p> <p>20 The Editors' Code provides a very good set of 21 binding professional standards and is a firm cornerstone 22 of the system of self-regulation. It is intended to 23 provide a clear view of what constitutes unacceptable 24 press behaviour. Mr Dacre has been chairman of the code 25 committee since 2008 and the code has evolved and been</p> <p style="text-align: center;">Page 43</p>
<p>1 Associated journalists were concerned, to help trace 2 people quickly, usually to verify facts or to comment on 3 stories that were written or were in progress prior to 4 publication.</p> <p>5 It should also be stressed that Mr Wittamore did not 6 work simply for newspapers; he was hired by 7 organisations such as banks, local authorities and firms 8 of solicitors who similarly were seeking to locate 9 people. Whilst Mr Wittamore was prosecuted, you will be 10 aware, sir, that no journalist has ever been charged 11 because there simply is no evidence that they ever asked 12 Mr Wittamore to do anything illegal or that they knew he 13 was or might be illegally accessing databases.</p> <p>14 Another key difference between phone hacking and the 15 data provision provided by Mr Wittamore is that 16 journalists using him were not engaged, we would 17 respectfully suggest, in fishing expeditions. When the 18 Commissioner's report was published in 2006, the editor 19 in-chief of Associated Newspapers, Mr Dacre, took 20 immediate action and banned from 2007 the use of all 21 enquiry agents. It was made quite clear that Associated 22 would not pay for them and that compliance with the Data 23 Protection Act was to become and is a term of 24 journalists' contracts with my clients.</p> <p>25 Sir, Associated Newspapers will seek to demonstrate</p> <p style="text-align: center;">Page 42</p>	<p>1 amended many times in the 20 years existence of the 2 Press Complaints Commission.</p> <p>3 For example, it was amended to impose an express 4 prohibition on hacking into the messages on mobile 5 phones or emails and to make it clear that editors and 6 publishers must ensure that its provisions are strictly 7 observed by even those non-journalists and external 8 contributors who may work on a story.</p> <p>9 Sir, the code is, of course, subject to the public 10 interest exception but without it, many major stories of 11 corruption and abuse of power could never have been 12 written. I understand, of course, that that is an 13 issue, the definition of "public interest", which 14 obviously is likely to be an issue of some keen concern 15 to you, sir, and the subject of submissions and inquiry 16 before you.</p> <p>17 But the public interest factor is often seen as the 18 press arrogating to itself a right to break the laws by 19 which we all live for their own commercial profit. We 20 suggest that that is completely to misunderstand the 21 role of a free press, which, in the words of 22 Lord Nicholls in the case of 23 Reynolds v Times Newspapers, is -- the vital function is 24 to act as a bloodhound as well as a watchdog.</p> <p>25 Ultimately, of course, if the judgment call is wrong</p> <p style="text-align: center;">Page 44</p>

11 (Pages 41 to 44)

<p>1 of the journalist and the lawyers and the editor, then 2 it is the editor and the journalist who may have to pay 3 the price, possibly by even risking their personal 4 liberty. Sometimes, as you know, it will be necessary 5 to engage with whistle-blowers who may, in the process, 6 reveal confidential or even secret information, or who 7 may need financial payment to support themselves for the 8 future and in consequence of their actions. The 9 Official Secrets Act might make the communication of 10 such information unlawful. The Bribery Act might 11 prohibit payment.</p> <p>12 Sir, in a letter to the Media Lawyers Association 13 in March of this year, the Lord Chancellor and Secretary 14 of State for Justice said in the context of the new 15 Bribery Act that he was confident that the 16 Director of Public Prosecutions and the Director of the 17 Serious Fraud Office "can take full account of the 18 considerations which may apply to a case involving 19 public interest reporting" when deciding, under the Code 20 for Crown Prosecutors, whether or not to prosecute in 21 a particular case. He added that he recognised: 22 "... the extremely important role played by the 23 media in our society and it is not the intention of the 24 Act to restrict legitimate and responsible journalism. 25 I hope you will be reassured that the public interest</p> <p style="text-align: center;">Page 45</p>	<p>1 contrary to open justice. We remain keen to explore 2 alternative avenues for meeting any concerns that may be 3 expressed by potential witnesses from whatever 4 publishing group they come and wish to stress that 5 Associated Newspapers is very keen to explore those 6 avenues, if they can be explored and met.</p> <p>7 Associate, so far as it knows, has nothing to hide 8 and welcomes complete transparency, and of course, sir, 9 we will respond to the draft anonymity protocol which 10 has been distributed.</p> <p>11 LORD JUSTICE LEVESON: It is a problem, and I understand 12 your concern, and I understand the specific concern that 13 an anonymous witness might besmirch a reputation which 14 can't be answered without detail. I have recognised 15 that such evidence in any event would inevitably carry 16 far less weight, but we'll have to see how we progress 17 on the specific examples.</p> <p>18 MR CAPLAN: Yes.</p> <p>19 LORD JUSTICE LEVESON: If there are any.</p> <p>20 MR CAPLAN: If there are any.</p> <p>21 Sir, if there is any malpractice, far better that 22 it's out in the open. We're all here to learn and 23 improve and to deal with it. If anybody has any 24 concerns, a working or former journalist, then we simply 25 say that we should respectfully seek to explore other</p> <p style="text-align: center;">Page 47</p>
<p>1 will remain a key consideration in any individual case."</p> <p>2 LORD JUSTICE LEVESON: Has anybody taken that up with the 3 director?</p> <p>4 MR CAPLAN: I cannot comment about that, but we will provide 5 copies of that correspondence to the Inquiry.</p> <p>6 LORD JUSTICE LEVESON: Thank you.</p> <p>7 MR CAPLAN: Sir, may I just turn to two short final topics? 8 The first is the question of anonymity. May I just say 9 a word about that.</p> <p>10 There may well be journalists or ex-journalists who 11 are wishing to give evidence to you and who may be 12 dissatisfied with their employers or former employers, 13 and we understand from a previous Inquiry hearing that 14 they may wish to do so from the position of anonymity 15 and that it may be that neither their name nor the 16 newspaper group for whom they work or worked will be 17 made public. If they have important evidence to give, 18 then we -- and I hope other newspaper publishers 19 present -- would encourage that evidence to be given as 20 openly as possible, and to be tested against the 21 substantial body of evidence that the Inquiry is 22 receiving.</p> <p>23 We have, however, expressed and continue to express 24 the most profound concern about the Inquiry receiving 25 evidence on the basis of anonymity, which, of course, is</p> <p style="text-align: center;">Page 46</p>	<p>1 alternatives. It may be a contempt -- and I would 2 respectfully suggest it is -- of your Inquiry if anybody 3 was to take steps to penalise them for giving that 4 evidence, and it may be possible to give undertakings -- 5 I don't know, we'd need to explore that -- which would 6 meet those concerns, but those are avenues which clearly 7 could be explored.</p> <p>8 LORD JUSTICE LEVESON: Yes.</p> <p>9 MR CAPLAN: Finally this, please. The drafting of the 10 Inquiry's terms of reference includes the critical issue 11 of regulation. Of course the Press Complaints 12 Commission can be made more effective. Our position is 13 that we strongly advocate it does not need to be 14 replaced; it needs to be and is capable of being beefed 15 up.</p> <p>16 We do say that the virtue of the current system is 17 that complaints by members of the public are generally 18 heard and resolved quickly, free of charge and without 19 the use of lawyers. Mr Dacre has already suggested at 20 one of your seminars that, for example, improvements 21 could be made by possibly introducing an industry 22 ombudsman who could be called in by the Commission or 23 work in tandem with it to investigate in serious cases, 24 with the power to impose some form of financial penalty 25 and costs orders.</p> <p style="text-align: center;">Page 48</p>

<p>1 Clearly, there needs to be more thought given to 2 corrections and better prominence. 3 Associated Newspapers has already begun that process and 4 has in fact instituted a system of giving speedy 5 corrections and prominence and there is obviously the 6 possibility of introducing lay participants onto the 7 Editors' Code committee. 8 We do say it is unacceptable that any newspaper 9 owner should be permitted to opt out of self-regulation, 10 and we suggest that a way may well need to be found to 11 ensure that all owners participate and fund in that 12 scheme. 13 LORD JUSTICE LEVESON: But once you say that, how do you 14 achieve that laudable aim without somebody saying, "You 15 have to." And somebody saying, "You have to", sounds to 16 me very much to me like a law that says you have to. 17 MR CAPLAN: There are possibly other ways and obviously this 18 is an issue -- 19 LORD JUSTICE LEVESON: Well, I'm all ears, Mr Caplan. 20 MR CAPLAN: We'll aim to provide some possible solutions. 21 But, we are firmly behind the suggestion that all 22 publishers or proprietors need to be involved in 23 a self-regulating scheme. 24 LORD JUSTICE LEVESON: And a way that encourages Internet 25 publishers of news to involve themselves in a mechanism</p> <p style="text-align: center;">Page 49</p>	<p>1 (11.29 am) 2 LORD JUSTICE LEVESON: Mr Millar, I wouldn't want to make 3 more of the point that I made yesterday than is there to 4 be made, but I didn't want there to be 5 a misunderstanding. 6 MR MILLAR: Absolutely. We considered your comments 7 yesterday afternoon about that sentence in paragraph 6 8 of our written submissions which quoted -- always 9 a dangerous thing to do -- a part but only a part of 10 a sentence -- 11 LORD JUSTICE LEVESON: It's not normally dangerous to quote 12 what judges say themselves, is it? 13 MR MILLAR: It is if you cut and paste it in that way. Take 14 part of a judge's sentence out of context and you can 15 get yourself into a mess, sometimes. 16 What we've done is we've submitted a revised version 17 of the written submissions which omits the entire 18 sentence in our submission, and therefore the part of 19 your sentence, and we're happy for that to be the 20 published version of our written submissions. We hope 21 that avoids any further consideration of the problem. 22 LORD JUSTICE LEVESON: Yes. But I'm sure you understand, 23 from what you heard me say yesterday and what you've 24 read that I've said that the fundamental principles are 25 entirely clear to me, and I don't believe you take issue</p> <p style="text-align: center;">Page 51</p>
<p>1 that does allow some form of oversight or control, 2 equally. Well, there it is. That's the mission. 3 MR CAPLAN: That's the mission. 4 Sir, that is all we wish to say to you by way of 5 opening. We'd like to thank you for the opportunity -- 6 LORD JUSTICE LEVESON: Thank you very much, Mr Caplan. I'm 7 grateful to all those who have spoken and will continue 8 to speak, I have no doubt, for the support that they'll 9 give me. 10 I think that's a convenient moment to give everybody 11 a break, and then we'll carry on in about -- does that 12 cause you inconvenience, Mr Millar? 13 MR MILLAR: Not if we carry on after the break. I did want 14 to mention the matter you mentioned yesterday. 15 LORD JUSTICE LEVESON: We're very, very welcome and we 16 certainly are, but if you're all right for a few 17 minutes, then I think we'll give the shorthand writer 18 a break. Thank you very much. 19 MR CAPLAN: Can I just make one correction? If I said in 20 relation to Motorman that the attempts to locate people 21 was to check the accuracy of printed stories, I meant 22 prepublication stories. I'm sorry if there was any 23 confusion. 24 (11.19 am) 25 (A short break)</p> <p style="text-align: center;">Page 50</p>	<p>1 with them. 2 MR MILLAR: Not at all, no. 3 LORD JUSTICE LEVESON: It's just a question of whether I've 4 committed myself to something. 5 MR MILLAR: Yes. I did, however, want to say this, hoping 6 that the deletion does resolve the matter: please accept 7 that we didn't intentionally spin part of your judgment. 8 That makes us more devious and perhaps more clever than 9 we are. We do understand that this was how it appeared 10 to you and we do, of course, therefore, apologise for 11 that, but it was inadvertent. 12 LORD JUSTICE LEVESON: Mr Millar, as I said right at the 13 beginning, I don't want to make more of it than it is. 14 MR MILLAR: Yes. 15 LORD JUSTICE LEVESON: I just wouldn't want the concept 16 behind the thought to have gained currency. 17 MR MILLAR: Absolutely. 18 LORD JUSTICE LEVESON: That was the point. 19 MR MILLAR: There will be plenty of scope for us to adopt 20 and we will adopt and make the submission that 21 a regulatory system different to the one we have at the 22 moment could -- that's the key word, "could" -- 23 depending on its features, impact adversely on freedom 24 of expression or have a chilling effect on responsible 25 journalism. We will make our arguments to that end when</p> <p style="text-align: center;">Page 52</p>

<p>1 the appropriate time comes but we don't want to suggest 2 that that was a view that you'd formed. When one reads 3 the judgment in context, it's quite clear that that 4 wasn't a view that you --</p> <p>5 LORD JUSTICE LEVESON: I'm quite clear that it's easy to 6 conceive of many regulatory systems that would 7 undeniably adversely affect freedom of expression and 8 provide a chilling effect on responsible journalism. 9 I have no wish to go down that route. The trick is to 10 find the right balance that does not have those adverse 11 effects, but does provide the necessary protection that 12 certainly it appears is required. It's the trick.</p> <p>13 MR MILLAR: Yes. That's a sentiment with which my clients 14 would not disagree.</p> <p>15 LORD JUSTICE LEVESON: Thank you very much indeed. 16 Mr Jay, who is supposed to be speaking now?</p> <p>17 MR JAY: I think on the programme we now have a little gap 18 until Mr Dingemans arrives at 3.15.</p> <p>19 LORD JUSTICE LEVESON: Oh, is nobody else willing to step up 20 to the plate?</p> <p>21 MR JAY: Apparently not, no. But tomorrow morning we have 22 a relatively full programme. 23 I don't know whether anybody has any point they wish 24 to raise now, legal or other nature, which we could deal 25 with on the hoof, or whether we just break now and come</p> <p style="text-align: center;">Page 53</p>	<p>1 really do have to press on, but I do understand the 2 particular problems this week and I won't press them. 3 I know Mr Dingemans has a particular commitment which he 4 could not avoid.</p> <p>5 All right. There it is. We'll resume at 3.15 pm, 6 when Mr Dingemans will provide opening submissions on 7 behalf of Northern & Shell, and then we'll deal with the 8 other opening submissions tomorrow.</p> <p>9 Thank you very much.</p> <p>10 (11.35 am) 11 (The luncheon adjournment)</p> <p>12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 55</p>
<p>1 back at 3.15.</p> <p>2 MR MILLAR: I'm wondering when we're going to get the full 3 set of statements for the first week of evidence, 4 because we haven't had them yet.</p> <p>5 LORD JUSTICE LEVESON: That's a good question. There's 6 a fastball for you, Mr Jay.</p> <p>7 MR JAY: Some of them have been made available. I will make 8 enquiry and give a timescale by 3.15 or at 3.15 for the 9 remainder.</p> <p>10 LORD JUSTICE LEVESON: Very good. Do we have a batting 11 order?</p> <p>12 MR JAY: Yes, and that has been provided. That is for five 13 working days commencing 21 November. The core 14 participants have seen that.</p> <p>15 LORD JUSTICE LEVESON: All right. Have you seen none of the 16 statements, Mr Millar?</p> <p>17 MR MILLAR: I've seen a few of them, but I think for the 18 majority of the listed witnesses for the first week we 19 still haven't seen the statements.</p> <p>20 LORD JUSTICE LEVESON: All right. We will check on that 21 now.</p> <p>22 Is there anything else that anybody usefully can 23 raise at this stage? I would not want it to be thought 24 that once we get into hearing evidence I will be taking 25 a relaxed line to the time that we sit, because we</p> <p style="text-align: center;">Page 54</p>	

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