

<p>1 Monday, 21 November 2011 2 (10.00 am) 3 Housekeeping 4 LORD JUSTICE LEVESON: Yes, Mr Jay. 5 MR JAY: There are two matters I'd wish to raise at the 6 outset. First of all, the sequencing of witnesses for 7 today. I think we will be hearing first from the 8 Dowlers, then from Joan Smith, then from Graham Shear 9 and then from Hugh Grant. 10 The second one is a housekeeping matter. It 11 concerns the status of the exhibits which have been 12 released to the core participants on the grounds of 13 confidentiality. It's right, I believe, that you should 14 make a restriction order under Section 19, subsection 2 15 of the Inquiries Act to protect the confidentiality of 16 those documents so that they do not enter the public 17 domain. 18 LORD JUSTICE LEVESON: These are documents that are relevant 19 to the investigation but fit into the category of those 20 documents that I don't wish to have the impact of 21 revictimising those about whom complaints have been made 22 or make complaints. 23 MR JAY: Yes. 24 LORD JUSTICE LEVESON: Does anybody have any observations 25 about that application?</p> <p style="text-align: center;">Page 1</p>	<p>1 So that everybody understands, however, the 2 procedure that the Inquiry is following, and so far as 3 these witnesses are concerned -- and this is the 4 procedure that the Inquiry has required -- we should put 5 questions to Inquiry counsel, Mr Jay, who will then, at 6 his discretion, put those questions, if he thinks 7 they're appropriate, to the witness on our behalf. 8 I have no doubt at all that Mr Jay will do a better job 9 than I would. 10 But, sir, I do not want to hide what is an important 11 concern, and that it is that reputational criticism can 12 be made by these witnesses in what is a televised 13 situation without any opportunity for the object of that 14 criticism to respond directly to questions from the 15 lawyers representing the core participants affected. 16 Therefore, can I just say two things, please. 17 Firstly -- and I understand your reluctance to 18 entertain such an application -- if it becomes necessary 19 to correct a matter as a matter of fairness -- I'm sure 20 Mr Jay will cover, I hope, all that we require, but if 21 it becomes necessary, then I hope you would entertain an 22 application under rule 10, subparagraph 4, provided we 23 notify you of the questions that we would wish to put to 24 a witness. I understand that that would be a position 25 of last resort.</p> <p style="text-align: center;">Page 3</p>
<p>1 Very good. Then I make those orders. Thank you. 2 Yes, Mr Caplan? 3 MR CAPLAN: Sir, just before you begin to hear the evidence 4 of those I think who have been termed the core 5 participant victims, may I just say a few words? We do 6 think it is important that those who are here and those 7 who will watch the proceedings clearly understand the 8 procedure which the Inquiry has laid down as being 9 appropriate for this evidence under the Inquiries Act. 10 We, of course, as have the other core participants, 11 have seen the witness statements of those who are going 12 to be called this week and next week, and it is right to 13 say that in some of them, there is varying degrees of 14 criticism of sections of the press and, on occasions, of 15 individual journalists, and of course that is why they 16 are here to give evidence to you. 17 May I say I'm not including in this the Dowler 18 family or the McCann family in any sense, but we do 19 believe that where criticism is made, especially of 20 individuals, and if it is our belief that that criticism 21 is incorrect, or for whatever reason, false, that common 22 fairness requires that we or any other core participant 23 who are affected ought to be able to put questions to 24 that witness in order to put the record straight or, at 25 the very least, to put the other side.</p> <p style="text-align: center;">Page 2</p>	<p>1 Secondly, to make it clear, so far as possible, we 2 will file, where necessary, to obviate the need for that 3 evidence with the Inquiry to correct any matter which we 4 perceive to be important and which needs to be 5 corrected. Just as one illustration of that, we will, 6 for example, file evidence -- and we'll hear this when 7 Mr Grant gives evidence -- concerning the way in which 8 Daily Mail journalists covered the announcement of the 9 birth of his daughter. We will file evidence showing 10 what we say the Daily Mail journalists did and explain 11 exactly what happened. That's no disrespect to 12 Mr Grant, who is here -- good morning. It is simply 13 that we wish to assist the Inquiry in explaining what 14 happened as an illustration and I hope it will be of 15 assistance to you and possibly even to Mr Grant. 16 LORD JUSTICE LEVESON: Yes. Well, the position of the 17 Inquiry is comparatively clear. It is abundantly clear, 18 based upon the approach that Sir Michael Morland adopted 19 in Northern Ireland, that it is unusual to permit 20 cross-examination outside the Inquiry team and the 21 challenge to that decision at common law failed in 22 Northern Ireland, I think. 23 MR CAPLAN: In certain respect. But if I may just say, 24 there is an overriding duty of fairness under section 17 25 of the Act and the rules, rule 10(4), do permit an</p> <p style="text-align: center;">Page 4</p>

<p>1 application by a core participant.</p> <p>2 LORD JUSTICE LEVESON: Absolutely, I understand that. The</p> <p>3 other important feature is to note that although you're</p> <p>4 at absolute liberty to file whatever evidence you feel</p> <p>5 is appropriate, and I will want to be balanced and fair,</p> <p>6 what is under investigation this morning, and indeed</p> <p>7 throughout the Inquiry, is the conduct and practice of</p> <p>8 the press, not the conduct and practice of any of the</p> <p>9 witnesses who are giving evidence.</p> <p>10 MR CAPLAN: I understand that and I hope -- I'm sure we all</p> <p>11 hope -- that the evidence will be limited so far as</p> <p>12 possible to deal with the general issues.</p> <p>13 LORD JUSTICE LEVESON: Yes.</p> <p>14 MR CAPLAN: It's simply to deal with any reputational</p> <p>15 criticism that may arise. That's all.</p> <p>16 LORD JUSTICE LEVESON: I understand. This is called a right</p> <p>17 of reply, which is one of the topics about which some of</p> <p>18 those who criticise the press complain. That's unfair,</p> <p>19 Mr Caplan, at this stage of the morning. Let's just see</p> <p>20 if we can't find the right balance.</p> <p>21 Thank you very much, I've understood the point.</p> <p>22 Right.</p> <p>23 MR JAY: We're going to proceed, therefore, with our first</p> <p>24 witnesses, who are the Dowlers, please.</p> <p>25</p> <p style="text-align: center;">Page 5</p>	<p>1 Questions from MR SHERBORNE</p> <p>2 MR SHERBORNE: With your permission, may I ask a few</p> <p>3 introductory questions?</p> <p>4 Good morning. I appreciate you may be nervous.</p> <p>5 I know your last experience was a difficult one. I'm</p> <p>6 not going to ask you detailed questions about your</p> <p>7 statement -- Mr Jay will do that in a minute -- but can</p> <p>8 I begin by asking you: we all know that it was the</p> <p>9 revelation publicly in July of this year that Milly's</p> <p>10 phone had been hacked into by people acting on behalf of</p> <p>11 the News of the World which led to the setting up of</p> <p>12 this Inquiry. Can I ask you how you feel about that?</p> <p>13 MR DOWLER: I'll answer this one. I think the gravity of</p> <p>14 what had happened needs to be investigated. I think</p> <p>15 there's a much bigger picture, obviously, but I think</p> <p>16 that given that we learnt about those hacking</p> <p>17 revelations just before the trial for the murder of our</p> <p>18 daughter, it was extremely important that we understood</p> <p>19 and people understand exactly what went on in terms of</p> <p>20 these practices to uncover this information from the</p> <p>21 hacking situation.</p> <p>22 Q. And prior to you discovering about Milly's phone, did</p> <p>23 you read stories about other people, including</p> <p>24 well-known people, whose phones had also been hacked</p> <p>25 into?</p> <p style="text-align: center;">Page 7</p>
<p>1 MR BOB DOWLER AND MRS SALLY DOWLER (sworn)</p> <p>2 LORD JUSTICE LEVESON: Please sit down. If at any stage you</p> <p>3 need a break, don't hesitate to say so.</p> <p>4 Before we start, can I thank you both for being</p> <p>5 prepared to come to the Inquiry. You've done so</p> <p>6 voluntarily and I'm very conscious that it's a strain.</p> <p>7 I can only sympathise to both of you for the appalling</p> <p>8 losses that you've suffered and the traumas that you've</p> <p>9 undergone over many years. So I'm very appreciative to</p> <p>10 both of you for being prepared to expose yourself</p> <p>11 further to assist me in the work that I have to do, so</p> <p>12 thank you very much.</p> <p>13 MR DOWLER: Thank you.</p> <p>14 Questions from MR JAY</p> <p>15 MR JAY: You are, respectively, Sally and Bob Dowler. I'm</p> <p>16 not going to ask you to provide your home address.</p> <p>17 You've provided a professional address.</p> <p>18 Can I ask you though, please, to confirm the witness</p> <p>19 statement which has been signed on 3 November. There's</p> <p>20 a statement of truth at the end of that statement. Do</p> <p>21 you confirm the truth of that statement?</p> <p>22 MRS DOWLER: Yes.</p> <p>23 MR DOWLER: Yes.</p> <p>24 MR JAY: Mr Sherborne has one or two questions for you and</p> <p>25 then I will ask some further questions.</p> <p style="text-align: center;">Page 6</p>	<p>1 MR DOWLER: Yes. We'd obviously been aware of the</p> <p>2 Sienna Miller situation and also Gordon Taylor. We</p> <p>3 certainly followed that in the media and were very much</p> <p>4 aware that, certainly from the celebrity awareness</p> <p>5 viewpoint, that was going to be an issue, but of course</p> <p>6 not realising until we were informed about hacking in</p> <p>7 our situation that it spread much wider than just</p> <p>8 celebrity.</p> <p>9 Q. How did you feel about the fact that there were other</p> <p>10 people whose phones had also been hacked? What impact,</p> <p>11 if anything, did that have on your case?</p> <p>12 MR DOWLER: Well, fundamentally, everybody's entitled to</p> <p>13 a degree of privacy in their private life, and it's</p> <p>14 a deep concern that our private life became public, but</p> <p>15 I think also that other people who are in the public</p> <p>16 eye, their private life become public as well.</p> <p>17 Q. We know that in time you instructed Mark Lewis, the</p> <p>18 solicitor. Can you just explain how you came to</p> <p>19 instruct Mr Lewis?</p> <p>20 MRS DOWLER: Well, it was during the trial. Just before the</p> <p>21 trial we'd found out about Milly's phone being hacked.</p> <p>22 When we were given that information, it was like</p> <p>23 terribly difficult to process it because what do you do</p> <p>24 with that information when it's in your mind? And I was</p> <p>25 worried about the sort of forthcoming trial, but also</p> <p style="text-align: center;">Page 8</p>

<p>1 aware of what had happened with Sienna Miller and 2 things, and thinking we ought to -- we ought to get some 3 representation, but I was frightened of doing that 4 because we didn't have any money for that, so I didn't 5 quite know how we were going to do that. 6 Then I found Mark Lewis on the Internet and left 7 a message on his phone and he phoned straight back and 8 said, "Please come and see me." 9 Q. What was your aim, your objective, in going to see 10 Mr Lewis? 11 MR DOWLER: I think very much just to be in a position to 12 respond to what would possibly become quite a public -- 13 how would we deal with that? Because we'd been given 14 that information but no advice as to what to do with it, 15 but recognising, of course, that that -- I suppose to 16 use the words quite powerful, quite dynamite information 17 to suddenly be aware of and realising, as has come to 18 pass, that when made public, suddenly everybody got 19 very, very, very excited and very -- yes, motivated 20 about the whole situation, so ... 21 Q. Can I ask you just a question about your legal 22 representation? Did you have the money to pay for legal 23 advice? 24 MRS DOWLER: No, we didn't. 25 Q. So how were you able to pursue a complaint against Page 9</p>	<p>1 story in the press. 2 MRS DOWLER: And I think as our daughter Gemma said to 3 Mr Murdoch when we met him: "Use this as an opportunity 4 to put things right in future and to have some decent 5 standards and adhere to them." 6 MR CAPLAN: Thank you very much. If you just wait there, 7 Mr Jay will have some further questions. 8 Questions from MR JAY 9 MR JAY: It's obviously fitting you should be the Inquiry's 10 first witnesses. I'm going to ask you first of all to 11 deal with paragraph 7 of your witness statement, please. 12 This is the private walk which occurred in May 2002. Do 13 you follow me? 14 MRS DOWLER: Yes. 15 Q. Can I ask you, please, to tell us about that in your own 16 words. You say it wasn't a formally organised walk? 17 MRS DOWLER: No. 18 Q. What was its purpose, please? 19 MRS DOWLER: Well, it was seven weeks after Milly had gone 20 missing, so a lot of the sort of initial media hype had 21 died down a little bit, and it was a Thursday and that 22 was the day that she'd gone missing and it was quite 23 a sunny afternoon and she would have come home about 24 4 o'clock, and I remember calling Bob and thinking 25 actually, he'd gone up to London on that day, into the Page 11</p>
<p>1 News International? 2 MRS DOWLER: When we went to see Mark, which -- I have to 3 say it was a really difficult thing to do because it was 4 during the trial and it was like: "We've got to do this, 5 Bob, because we need someone to represent us", and 6 literally dragged ourselves along to that meeting, and 7 he said, "You don't need to worry about the money, 8 Sally. I will represent you come what may", and then 9 actually with regard -- we were able to use a CFA 10 agreement, otherwise we wouldn't have been able to 11 proceed. 12 Q. Can I finally ask you this: we know that the 13 News of the World settled your claim in July of this 14 year, and you heard my opening submissions and you heard 15 the opening submissions of the other media 16 representatives. What, if anything, would you like to 17 say to News International now? 18 MR DOWLER: I think, given the gravity of what became 19 public, the main knowledge about what had happened about 20 our phone-hacking situation and the circumstances under 21 which it took place, one would sincerely hope that 22 News International and other media organisations would 23 sincerely look very carefully at how they procure, how 24 they obtain information about stories, because obviously 25 the ramifications are far greater than just an obvious Page 10</p>	<p>1 office, and I said to him: "Why don't you come back to 2 Walton and then I'll meet you there and we'll do that 3 walk back?" Because so many questions are just buzzing 4 around in your head -- why didn't anyone see her, 5 et cetera, et cetera -- and it was a very last-minute 6 argument, so it was maybe an hour or two before that 7 I phoned Bob and said, "Look, I want to do this. I'm 8 going to meet you at the station and we'll walk back 9 together." 10 Q. Yes. 11 MRS DOWLER: Previously, there had been a lot of press and 12 things at the station but now it had calmed down a bit 13 and when we actually got there, there was no one there. 14 It was empty. 15 Q. Yes. 16 MRS DOWLER: So simply one of the police officers that I was 17 working with, one of our fellows dropped me at the 18 station. I met Bob and then we just basically quietly 19 retraced her steps and no one was really around, so it 20 was very much like the day she'd actually gone missing, 21 and we put out missing leaflets with her photograph and 22 a telephone number on, and that number had been changed, 23 and I was checking the posters to see if the number -- 24 if the right poster was up, and as I walked along, I was 25 sort of touching the posters. Page 12</p>

<p>1 And we walked back to our house, which is maybe 2 three-quarters of a mile, something like that, and that 3 was on the Thursday, and then on the Sunday, that 4 photograph appeared in the News of the World and I can 5 remember seeing it and I was really cross because we 6 didn't see anyone. They'd obviously taken the picture 7 with some sort of telephoto lens. How on earth did they 8 know we were doing that walk on that day? And it just 9 felt like such an intrusion into a really, really 10 private grief moment, really.</p> <p>11 Q. Yes. So it goes without saying you were completely 12 unaware at the time that people were watching you, as it 13 were?</p> <p>14 MRS DOWLER: Yes, absolutely.</p> <p>15 Q. We have the article. I'm not going to ask that it be 16 put on the screen, but as you know it's exhibited to 17 your witness statement. We can draw our own inferences 18 as to where the photographer must have been. Some 19 distance, of course, in front of you.</p> <p>20 MRS DOWLER: Yes. I don't know where he would have been to 21 take those pictures. Maybe in a parked car down Rydens 22 Road somewhere. I don't know.</p> <p>23 MR DOWLER: But you see from the picture that we're 24 basically just walking along, completely immersed in the 25 moment, is the honest phrase, I suppose, I would use,</p> <p style="text-align: center;">Page 13</p>	<p>1 bit more about that, please?</p> <p>2 MR DOWLER: Certainly. It became quite a regular event for 3 people to knock on the door. We'd established that we 4 wouldn't do any interviews, we'd actually only do 5 everything through the Surrey Police press office, for 6 the simple reason of not wanting to create any media war 7 between a particular publication having an access which 8 they might consider, let's say, exclusive, but 9 certainly -- it was fine, it was polite, and I think at 10 the end of the day our response was the same, it always 11 has been the same: we won't do -- and even recently, 12 we've been doorstepped in recent times as well.</p> <p>13 But I think the thing that was probably quite 14 difficult was that on our own property, I was out the 15 front on our front drive, probably putting something in 16 our recycling bin or something, and suddenly this person 17 just hopped from behind the hedge and approached me. It 18 was just at the moment -- I remember it specifically 19 because it was the time that the head of the 20 investigation of the Surrey Police team was changed, and 21 he immediately said to me, "What do you think of the 22 head of the investigation being changed?" And I mean, 23 really, it was a sort of, well, what possibly am I going 24 to say? Fortunately, I had the foresight to think: 25 well, actually, I'm not going to say anything, just say</p> <p style="text-align: center;">Page 15</p>
<p>1 and just Sally suddenly saw the poster and decided to 2 check it.</p> <p>3 Q. Yes. We see on the second page that they do give the 4 Surrey Police reward, top line, for what its worth.</p> <p>5 MR DOWLER: Yes.</p> <p>6 Q. Did you make any complaint about this beyond telephoning 7 the police family liaison officer, do you recall?</p> <p>8 MRS DOWLER: No. No, I just phoned -- did phone our FLO on 9 that day and had a little bit of a .rant.</p> <p>10 Q. Yes.</p> <p>11 MRS DOWLER: And asked, "How did they get this picture?" But 12 in the scheme of things, at the time, more importantly 13 was the fact that Milly was missing.</p> <p>14 Q. Yes, of course.</p> <p>15 MRS DOWLER: And that was more mind-consuming.</p> <p>16 Q. It wouldn't have entered your mind, presumably, to 17 contact the Press Complaints Commission?</p> <p>18 MRS DOWLER: Not at that time, no.</p> <p>19 MR DOWLER: And we'd agreed that we would do all our press 20 communications through the Surrey Police press office, 21 for obvious reasons, anyway.</p> <p>22 Q. In paragraph 10 of your statement -- it may be Mr Dowler 23 can better deal with this, but I'm in your hands -- you 24 refer to situations when you were doorstepped by 25 journalists and photographers. Can you tell us a little</p> <p style="text-align: center;">Page 14</p>	<p>1 I have no comment, and I think -- I don't know -- 2 I think he might have introduced which media he was 3 from, but I think something, you know, appeared in the 4 paper probably the next day to say, you know, "Mr Dowler 5 said, 'No comment', or something to that effect, but for 6 the simple reason that obviously, you know, as we said, 7 to try and avoid giving specifics, because once you 8 engage in one question, then there's the next question, 9 and then you're engaged in a discussion and that, 10 I guess, de facto, becomes an interview, doesn't it?"</p> <p>11 Q. Yes.</p> <p>12 MRS DOWLER: I think, in fact, every time we went out the 13 front door, it's like you had to be on guard because 14 someone might be there and they would come up to you 15 when you're least expecting it, so as you're sort of 16 lifting stuff in and out of the car or something, and 17 then they'll fire a question at you without introducing 18 themselves, and so you have to train yourself not to 19 answer.</p> <p>20 Q. Yes. Maybe you feel the pressure of staying from that 21 sort of tactic altogether, doorstepping you. Is that 22 what you feel?</p> <p>23 MR DOWLER: I think it's quite concerning, because I think 24 however polite people are, at the end of the day, you 25 really are afeared to open your front door because</p> <p style="text-align: center;">Page 16</p>

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<p>1 you're faced with a question.</p> <p>2 Q. Yes.</p> <p>3 MR DOWLER: And however you respond to that question might</p> <p>4 then lead to a headline of one line or two, and that's</p> <p>5 obviously difficult to deal with, so I think -- but</p> <p>6 we've always tried to be polite and courteous and leave</p> <p>7 it at that.</p> <p>8 Q. Yes. Of course, I have to ask you next about Milly's</p> <p>9 phone and the voicemail interception. You deal with</p> <p>10 this at paragraphs 13 to 15 of the witness statement.</p> <p>11 First of all, in trying to fix this into the</p> <p>12 chronology, you think this must have been in April</p> <p>13 or May 2002; is that correct?</p> <p>14 MRS DOWLER: Yes, it was quite soon after she'd gone missing</p> <p>15 because where she actually was abducted was opposite</p> <p>16 this building called the Bird's Eye building down by</p> <p>17 Walton station and there were CCTV cameras on the Bird's</p> <p>18 Eye building, so everything really focused around these</p> <p>19 CCTV cameras. So we were asked to go up and have a look</p> <p>20 at some of the CCTV to see if we thought someone on it</p> <p>21 was Milly.</p> <p>22 Q. Yes.</p> <p>23 MRS DOWLER: And -- do you want me to tell you about what</p> <p>24 happened?</p> <p>25 Q. Yes. Well, first of all, you tell us that you were</p> <p style="text-align: center;">Page 17</p>	<p>1 the only reason it could have happened or what have you,</p> <p>2 but it was the -- like I told my friends: "She's picked</p> <p>3 up her voicemail, she's picked up her voicemail."</p> <p>4 Q. That is certainly a reasonable inference. Can you tell</p> <p>5 us anything about the police reaction when you shared</p> <p>6 that with them?</p> <p>7 MRS DOWLER: Well, I remember telling -- all I can remember</p> <p>8 is that they told us they'd put some credit on her phone</p> <p>9 because she had a -- she was very low -- well, she had</p> <p>10 no credit on her phone, and -- yeah, I can only really</p> <p>11 remember them telling us they'd put some credit on her</p> <p>12 phone.</p> <p>13 Q. Yes, and when you told them that you'd managed to get</p> <p>14 through to the voicemail message, did that excite any</p> <p>15 particular reaction from the police?</p> <p>16 MRS DOWLER: I can't really remember that.</p> <p>17 MR DOWLER: I think one of the FLOs was with us, I think,</p> <p>18 wasn't he, at the Bird's Eye building, but it's --</p> <p>19 unfortunately, I mean, that's nine years ago, for us to</p> <p>20 remember the details, so I'm sorry --</p> <p>21 Q. Whether it had an impact on the police investigation is</p> <p>22 a matter of speculation?</p> <p>23 MR DOWLER: It's something for them, isn't it? Because at</p> <p>24 the end of the day, it was their investigation.</p> <p>25 Q. And then much later on -- this was shortly before the</p> <p style="text-align: center;">Page 19</p>
<p>1 phoning in to Milly's voicemail?</p> <p>2 MRS DOWLER: Yes.</p> <p>3 Q. Quite regularly, presumably?</p> <p>4 MRS DOWLER: Yes.</p> <p>5 Q. To see whether there was anything else there?</p> <p>6 MRS DOWLER: Yes. Of course, all the time we were -- at</p> <p>7 first, we were able to leave messages, and then her</p> <p>8 voicemail became full and then you rang and then you</p> <p>9 just got the recorded "We are unable to leave messages</p> <p>10 at the moment".</p> <p>11 Q. Right?</p> <p>12 MRS DOWLER: This had gone -- so I was used to hearing that</p> <p>13 and we'd gone up to the Bird's Eye building to look at</p> <p>14 the CCTV and we were sitting downstairs in reception and</p> <p>15 I rang her phone.</p> <p>16 Q. Yes.</p> <p>17 MRS DOWLER: And it clicked through onto her voicemail, so</p> <p>18 I heard her voice, and it was just like -- I jumped --</p> <p>19 "She's picked up her voicemails, Bob, she's alive", and</p> <p>20 I just -- it was then, really. Look, when we were told</p> <p>21 about the hacking, that is the first thing I thought.</p> <p>22 Q. Yes. So your immediate reaction was to phone Gemma; is</p> <p>23 that right?</p> <p>24 MRS DOWLER: Gemma, yes, I spoke to Gemma, and then it sort</p> <p>25 of died down afterwards because you're thinking: is that</p> <p style="text-align: center;">Page 18</p>	<p>1 criminal trial -- you learnt from the police that the</p> <p>2 voicemail had been hacked into by the News of the World?</p> <p>3 MRS DOWLER: Yes.</p> <p>4 Q. April of this year, I think?</p> <p>5 MRS DOWLER: Yes.</p> <p>6 MR DOWLER: Certainly by Mr Mulcaire or -- I think</p> <p>7 specifically that's what we were told.</p> <p>8 Q. Yes. What was your immediate reaction to that piece of</p> <p>9 news?</p> <p>10 MRS DOWLER: Well, we got a call from our FLO to say that</p> <p>11 the Met Police wanted to see us and to tell us vaguely</p> <p>12 what it was about. And as soon as I was told it was</p> <p>13 about phone hacking, literally I didn't sleep for about</p> <p>14 three nights because you replay everything in your mind</p> <p>15 and just thinking: "Oh, that makes sense now, that makes</p> <p>16 sense." And then we went along to the meeting and</p> <p>17 I said to them about this instance in the Bird's Eye</p> <p>18 reception and also about walking back from the station</p> <p>19 were the two things that, at the time, I'd thought:</p> <p>20 "This is odd. Something untoward is going on."</p> <p>21 Q. Yes. So in your mind, you made an immediate connection</p> <p>22 with the dialling into the voicemail that you've told us</p> <p>23 about and also a possible connection with the private</p> <p>24 walk you told us about?</p> <p>25 MRS DOWLER: Yes. Yeah.</p> <p style="text-align: center;">Page 20</p>

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<p>1 MR DOWLER: I think the thing to remember, of course, is 2 that the walk was nothing to do with Milly's phone, so 3 that could only have come from -- 4 MRS DOWLER: Yeah, that was our home phones or our own 5 mobile phones. 6 Q. Yes. Thank you for that, and we know for obvious 7 reasons, namely the fact of the criminal trial, that 8 this was information you could not share more widely 9 until the trial had concluded, and we also know that the 10 date of the revelation in the press, I think, was 4 July 11 of this year, so it fits into the chronology. 12 Can I ask you some wider questions? You referred to 13 the press being a double-edged sword. It's obvious, 14 I suppose. You had to engage to some extent in order to 15 assist the police in their inquiries. On the other 16 hand, there was a very important domain which was 17 private. Is there anything else you would like to 18 assist the Inquiry about in relation to the double-edged 19 nature of what you might have had to do at that time? 20 MRS DOWLER: Well, I think in essence with our situation, 21 you have to remember we were really, really desperate 22 for some information about Milly, and so the press were 23 in a position to be able to help us and they did get the 24 message out that she was missing and lots of information 25 came in to the police headquarters. But on the other</p> <p style="text-align: center;">Page 21</p>	<p>1 brilliant. They really helped us. And Surrey Police 2 press office were co-ordinating things, so they took the 3 majority of the burden off of us. 4 Q. Yes. 5 MR DOWLER: And we chose that route, as well. That was 6 definitely the route we wanted to go. 7 Q. I'm not going to ask you about the settlement of your 8 civil claim, but could I just ask you about -- you 9 referred to a meeting with Mr Rupert Murdoch, which 10 I think was probably about the 12th or 13 July. The 11 date isn't going to matter. Presumably that was 12 a difficult meeting for both of you; is that right? 13 When I say "both of you", I mean both of you and for 14 Mr Murdoch? 15 MRS DOWLER: Yes, it was a very tense meeting. 16 MR DOWLER: Mm. 17 Q. He made it clear that what had happened was totally 18 unacceptable, didn't he? 19 MRS DOWLER: He did, yes. Yes, he was very sincere. 20 Q. You refer to a letter from the then CEO of the company 21 and a meeting with the Prime Minister, which I don't 22 think it's necessary to go into unless you would like 23 to. 24 Can I ask you, though, both of you, about the 25 section of your statement which deals with the future.</p> <p style="text-align: center;">Page 23</p>
<p>1 hand, the persistent being asked questions and being 2 doorstepped and everything else that's associated with 3 it and all the letters that you get requesting books, 4 films, interviews ... 5 MR DOWLER: I think -- the point I made just now is that 6 I follow the media over the years quite a bit more than 7 Sally does, and certainly recognise that it's very 8 important that we would try to be as consistent as we 9 could when dealing with the media and not to actually 10 give any one party a particular position or angle for 11 the very reason of actually not wanting to create 12 another set of issues to deal with, because in fact in 13 the early days, those first six months, of course, we 14 were in a very desperate situation and in fact it -- 15 it's unprecedented in your normal life for most people. 16 How do you deal with it? How do you deal with these 17 things? So we tried as best we could to be as balanced 18 as we could about it, but recognising, of course, that 19 things are outside of your own control. 20 Q. Yes. It's plainly well outside your own experience. 21 You had to rely on your own judgment in an entirely 22 unique situation. Did you get any help from -- you 23 talked about police liaison officers. Presumably they 24 did give you considerable assistance at this time? 25 MRS DOWLER: Very much so. The FLOs, yeah, they were</p> <p style="text-align: center;">Page 22</p>	<p>1 You touched on this a little bit, Mr Dowler. This 2 Inquiry is here to consider press culture, practices and 3 ethics, to some extent looking back in time, but it's 4 looking at the present and will look at the future. 5 It's also here to make some recommendations. This is 6 your chance. Is there anything you would like to 7 suggest to Lord Justice Leveson for him to think about 8 at this stage? 9 MR DOWLER: I think when we went to see the three party 10 leaders and the Prime Minister, we were asked that 11 question at that time and the problem that Sally and 12 I have -- we're ordinary people so we have no experience 13 in such a public life situation and certainly no 14 experience from a media control, media involvement 15 situation, so it's always been on our own best judgment 16 as to how we've dealt with these matters. 17 MRS DOWLER: I think it was more we wanted the extent of it 18 exposed and then the Inquiry could make the decisions. 19 Q. Yes. I mean, it appears to the Inquiry that your 20 judgment has been, if I may say so, extremely well 21 exercised throughout in very difficult circumstances and 22 we understand and appreciate that. If you have anything 23 more general which you would invite the Inquiry to think 24 about -- but if not, there's no problem. We will be 25 thinking --</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 MRS DOWLER: I think we'll leave that up to you. 2 MR DOWLER: I'm sorry, we're not -- 3 LORD JUSTICE LEVESON: How very generous of you. Thank you 4 MR DOWLER: Well. 5 MR JAY: I have no further questions for you, but I'm 6 extremely grateful for your evidence and the way in 7 which you've kindly and frankly answered my questions. 8 Thank you very much. 9 LORD JUSTICE LEVESON: Thank you very much. 10 Mr Sherborne, I think you're entitled to make an 11 application as you're acting for the Dowlers, but is 12 there any other question that you want to ask? 13 MR SHERBORNE: I have no further questions. 14 LORD JUSTICE LEVESON: Thank you very much indeed. Thank 15 you very much for coming. 16 MR JAY: May I break for five minutes before we call our 17 next witness? 18 LORD JUSTICE LEVESON: Yes, certainly. Five minutes. 19 (10.38 am) 20 (A short break) 21 (10.45 am) 22 LORD JUSTICE LEVESON: Right. Yes. 23 MRS PATRY HOSKINS: Good morning. I'm going to call the 24 next witness, Ms Smith. 25</p> <p style="text-align: center;">Page 25</p>	<p>1 please? 2 A. I've been a journalist for more than 30 years. 3 I started my career in national newspapers on the 4 Sunday Times. I worked for the Sunday Times insight 5 team doing investigative journalism, doing stories like 6 the Iranian embassy siege, the Yorkshire Ripper murders 7 and so on. 8 After that, I decided to go freelance and I've 9 written for a lot of national newspapers: the Guardian, 10 both the Independents, mainly as a columnist, the 11 Evening Standard too, and I also write books. I'm the 12 author of six novels -- published novels and I also 13 write feminist books and my most famous book is about 14 women-hating, called "Mysogynies", and I also wrote for 15 Penguin a book about secular morality. And then I do my 16 human rights work. For -- from 2000 to 2004, I chaired 17 the English PEN Writers In Prison Committee, which was 18 set up to promote freedom of expression around the world 19 and to look after imprisoned writers and their families. 20 So at any one time, we were looking after about 50 21 writers, academics, poets and so on in places like 22 Syria, China, trying to make representations on their 23 behalf. Latterly, we started sending people to observe 24 their trials if they were in court. 25 I -- in 2005, I went and observed the trial of Orhan</p> <p style="text-align: center;">Page 27</p>
<p>1 MS JOAN ALISON SMITH (affirmed) 2 LORD JUSTICE LEVESON: Ms Smith, I'll say to you as I've 3 said before. Thank you very much indeed for agreeing to 4 give evidence. This was a voluntary activity and I'm 5 conscious that it exposes personal matters that affect 6 you in the public domain, which is one of the things 7 you're concerned about, so I'm very grateful to you. 8 A. Thank you. 9 Questions from MRS PATRY HOSKINS 10 MRS PATRY HOSKINS: Good morning, Ms Smith. 11 A. Good morning. 12 Q. Could I ask you to state your full name? 13 A. Joan Alison Smith. 14 Q. Thank you. You provided a witness statement to this 15 Inquiry and we can see that, I think, on the big screen. 16 Before I ask you any detailed questions about your 17 statement, please, can I ask you to confirm that the 18 contents of your witness statement are true to the best 19 of your knowledge and belief? 20 A. Yes. 21 Q. On that basis, can we start with who you are. Those who 22 have the witness statement in front of them are meant to 23 be looking at paragraphs 4 to 7, but for those who don't 24 have the statement, could you tell us a little about who 25 you are and some brief details of your career history,</p> <p style="text-align: center;">Page 26</p>	<p>1 Pamuk in Istanbul when he was on trying for insulting 2 Turkish identity and then latterly, in 2008, I got 3 involved in a literacy project in Sierra Leone, 4 collecting books in this country. I did that with the 5 Times. They gave me the space to launch an appeal for 6 children's books when I came back from Freetown, and we 7 were able to collect about a quarter of 8 a million/300,000 children's books, which we shipped out 9 to Sierra Leone to set up school libraries in -- between 10 1,500 and 2,500 books in different schools. So I do 11 both those things. 12 Q. Thank you very much. Can I ask you about one specific 13 part of your career history, please, the one that you 14 deal with, for everyone who has the statement, at the 15 end of paragraph 11 of your statement. It's 23461 on 16 the screen. 17 This is work that you do or you did with the human 18 rights policy department of the Foreign Office, 19 campaigning for freedom of expression for journalists 20 around the world. Can you tell us very briefly about 21 that work? 22 A. Robin Cook was a friend of mine and in 2001, just before 23 the election, he asked me if I would share his last big 24 speech as foreign secretary -- well, we didn't know it 25 was his last big speech, obviously. And afterwards, at</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 a -- he wanted to talk about how he had put into action 2 the ethical dimension of his foreign policy, which had 3 been a very famous statement that he'd made after he 4 became foreign secretary in 1997, and at a lunch 5 afterwards, I met both his special adviser, Michael 6 Williams, and the head of the human rights policy 7 department, and they said to me: "We want more 8 involvement with NGOs", and PEN obviously has NGO 9 status, and they suggested that if I was thinking of 10 sending someone to observe a trial in somewhere like 11 Belarus, which is actually quite a frightening thing to 12 do, to go to court somewhere like that, that we could 13 liaise with the Foreign Office and they would put us in 14 touch with ambassadors and high commissioners. And we 15 set up quite an effective system, so that if somebody 16 was -- I remember there was a trial in Belarus in 17 particular. I asked someone from the PEN committee to 18 go and observe the trial and they got a lot of help from 19 the British ambassador in Minsk, which was very 20 fortunate because actually there was a very unpleasant 21 scene and the court was cleared by the local version of 22 the KGB. 23 We also did things like -- there are bipartite talks 24 every year on the future of Turkey's application to June 25 the EU and we did a lot of monitoring of human rights in Page 29</p>	<p>1 the sense that I write books and increasingly people who 2 write books are expected to turn up at literary 3 festivals and talk about where we get our ideas from and 4 things like that, but I'm a writer. I can speak in 5 public and I have, but I don't think that I'm somebody 6 whose private life would be of much interest to the 7 reading public. I mean, I'm sure that apart from the 8 papers I write for and people who maybe like my novels, 9 most newspaper readers would be quite baffled to know 10 who I was. 11 Q. Moving on then to a brief question about your personal 12 life -- I don't really want to ask about any aspect of 13 your personal life save one. You say at paragraph 8 of 14 your statement that for a number of years you were in 15 a relationship with Dennis MacShane, who's the MP for 16 Rotherham and Foreign Minister for Europe. Is that 17 correct? 18 A. Yes. 19 Q. Can I ask you this -- it's probably an indelicate 20 question, but was there anything illegitimate or 21 secretive about that relationship? 22 A. Dennis and I were -- he was my partner from 2003 to 23 2010, and I was always quite open about it. I mean, 24 just before this -- I first appear in Mr Mulcaire's 25 notes, we had been to a conference in Venice that Dennis Page 31</p>
<p>1 Turkey and we would take part in those talks at the 2 foreign office each year and give lists of things like 3 all the books that had been banned in Turkey in the last 4 year and whether it was going up or down and whether 5 journalists were still being imprisoned and so on. 6 Q. Obviously a lot of interesting work here on freedom of 7 expression issues. Tell us briefly, how important do 8 you consider freedom of expression for journalists to 9 be? 10 A. Oh, I think it's absolutely essential. I mean the 11 reason I got involved in this work, this voluntary work, 12 is that it seems to me that a free press is absolutely 13 a cornerstone, sine qua non, of civil society. If you 14 don't have a free press which is able to call 15 politicians and big companies and corporations, 16 multinational corporations, all sorts of people to 17 account, then I think you have real problems. So I've 18 always felt that I was very lucky to be able to pursue 19 a journalistic career in a country where we did have 20 a free press because I'm very aware of what happens to 21 journalists in countries where there isn't one. 22 Q. You've told us bit about the interesting work you do but 23 can I ask you this: do you consider yourself to be 24 a celebrity? 25 A. Not in the least. I'm a very minor public figure, in Page 30</p>	<p>1 was speaking at in early 2004 and I remember that we had 2 dinner with the former Prime Ministers of Italy and 3 Sweden. That doesn't seem to me a very secretive way to 4 conduct a relationship. 5 Q. Before I move off your personal life, I just want to ask 6 you this: you say at paragraph 27 of your witness 7 statement that you rarely mention your private life when 8 you write your columns and so on. Can you tell me 9 whether you ever have discussed your personal and 10 private life in your columns, and if so, what sort of 11 thing would you typically say? 12 A. Very rarely. I mean, I remember once Dennis rang me and 13 said that he and three friends had just got to the 14 summit of Mont Blanc that morning and he was excited 15 about it, and I was writing, as it happened, a column 16 for the Independent that day, and I was talking about 17 changes -- the way in which ageing has changed and how 18 people of my generation do things at ages that my 19 parents would never have dreamed of and I just mentioned 20 that. But it was just a sort of, you know, half 21 sentence about my partner rang to say he'd climbed Mont 22 Blanc with three friends who were all in their late 50s. 23 That was all. 24 Q. You mentioned a moment ago that you had appeared in the 25 now famous Mulcaire notebooks, so let me ask you Page 32</p>

8 (Pages 29 to 32)

<p>1 a little bit about your experience of phone hacking, if 2 I can. When did you first become aware that your 3 voicemails might have been accessed in that way? 4 A. In April this year when I got an email from a detective 5 at Operation Weeting. 6 Q. Can you tell us a bit about what happened and what you 7 did? 8 A. I arranged to -- I got in touch with the detective and 9 wrote back to his email and said, "I gather you're 10 trying to get in touch with me and here are all my 11 details", including my home address and my home 12 telephone number and my mobile phone, and he emailed 13 straight back and said, "Oh right, those are all the 14 details that we have in Mr Mulcaire's notebook." So he 15 invited me to a meeting and I went to my lawyer, 16 Beinman(?), Tamsin Alin(?) organised a meeting and two 17 detectives came, and I sat next to one of them and 18 Tamsin sat across the table with another detective, and 19 there's a kind of ceremonial unveiling of the notes and 20 you're asked -- I'm sure lots of other people have gone 21 through this now. You're asked, "We're going to show 22 you some pages photocopied from Mr Mulcaire's notebook. 23 Can you tell us if you -- if you recognise anything?" 24 And of course, the very first page is my name, address, 25 all my phone numbers and so on, and as the pages go by,</p> <p style="text-align: center;">Page 33</p>	<p>1 the impact of shock, and on that occasion I didn't 2 because I was just in a daze. I saw all these notes and 3 Mr Mulcaire had obviously found out that -- he made 4 a note that we were going to Spain. I was going to 5 a PEN conference to meet other people, other writers who 6 worked for freedom of expression. I was going to 7 Barcelona and Dennis was actually coming out the 8 following weekend and he was going to make a speech in 9 Spain and we were arranging to meet up, and I was amazed 10 by the detail of notes that Mr Mulcaire had made about 11 flight times and a note saying "her to him", so it 12 appeared that he'd been getting information from my 13 voicemail. 14 And the police -- the police said to me: "Is there 15 any way that Mr Mulcaire could have got this information 16 legitimately?" And given that it was about two months 17 after the Atocha bombings in Madrid when there was 18 a very high level of security around government 19 ministers, it did seem unlikely that he -- so anyway, to 20 answer your question, I remember leaving that meeting 21 and I had to go to a meeting in the City and I -- my 22 mind was just buzzing. And again, as the Dowlers were 23 saying, you suddenly start thinking: "Oh, did that 24 happen? Does this explain something?" And I arrived 25 at my meeting and I was slightly early and went up to</p> <p style="text-align: center;">Page 35</p>
<p>1 Mr Mulcaire made a note of the fact that I was writing 2 for both the Independent and the Times, and what seemed 3 significant to me and what I found profoundly shocking 4 was that he seems to have been a very obsessive 5 note-taker and as well as writing the name in the corner 6 of the person at the News of the World he was dealing, 7 he also made a note of dates, and my name and address 8 and details appear in Mr Mulcaire's notes for the first 9 time on 5 May 2004, and that's approximately six weeks 10 after Dennis' eldest daughter was killed in a skydiving 11 accident in Australia, which had attracted a huge amount 12 of publicity, and I was incredibly shocked that in that 13 period when Dennis was bereaved -- and, as you can 14 imagine, it's not an easy time for anybody when 15 a 24-year-old girl has just died in such 16 circumstances -- that the News of the World had been 17 interested enough in both of us to ask Mr Mulcaire to 18 listen to our voicemails. 19 Q. Can you tell us what your reaction was when you saw this 20 notebook and you found out in all likelihood you had had 21 your voicemails accessed at this time? 22 A. I'm amazed by how shocked I was because in my 23 journalistic life, I've had one or two bad experiences, 24 you know. I was caught in a riot in Sierra Leone last 25 year which was pretty unpleasant and I do now recognise</p> <p style="text-align: center;">Page 34</p>	<p>1 the boardroom and the managing director's secretary came 2 in and said, "Are you all right? You look completely 3 white", and got me a cup of tea and I realised 4 afterwards it was just shock, complete shock. I had no 5 idea that was happening. 6 Q. Can I ask something else about that period? You said 7 that you were writing columns during that period. What 8 sorts of things were you writing about? 9 A. I was writing a lot for the Times and I was writing 10 columns for the Times and they would ask me to do 11 additional things like Vivien Westwood was having a huge 12 retrospective of her work at the V&A and they asked me 13 to go and do a cover feature. So I interviewed Vivien 14 Westwood and my name was on the cover of T2. I was also 15 writing columns and I think it was on 8 April 2004 -- 16 Q. I think we have that document. It was handed out this 17 morning to everyone. 18 A. Yes. I wrote a column -- this column headed 19 "Celebrities or pagan deities". I think there had been 20 a huge amount of interest in the marriage of the 21 Beckhams at that point and they had been doing what 22 celebrities often do, which is try to kind of negotiate 23 their way through a personal crisis while also not 24 alienating the media, and so I wrote a column saying -- 25 and I suppose what was in the back of my mind was</p> <p style="text-align: center;">Page 36</p>

<p>1 that -- the intrusive reporting of the death of Dennis' 2 daughter a month before. I wrote a column saying that 3 I think that people make unwise decision, they think 4 that -- celebrities think that they can kind of control 5 the media, you know, that they can keep them friendly, 6 and actually the appetite for stories and personal life 7 is so remorseless that they lose control of the story. 8 So I was saying in this piece that I found it very 9 disturbing that we've gone from a situation where, 10 you know, the idea of privacy used to be a shield for 11 hypocrisy, so people used to do terrible things in their 12 private lives and pretend that they were upstanding, 13 fine Christian gentlemen and so on. We've moved from 14 that, which was not a great thing, to a situation where 15 people have almost no privacy at all and I was saying in 16 this column in the Times that I found it incredibly 17 shocking that no matter what happens to people, whether 18 it's a bereavement or a marital problem, you're 19 apparently expected to deal with this completely in the 20 public eye and be open with the media. And I wrote this 21 column in the Times and four weeks later the 22 News of the World asked Mr Mulcaire to spy on me. 23 Q. What's the link in your mind? 24 A. Um ... 25 Q. If any.</p> <p style="text-align: center;">Page 37</p>	<p>1 Lord Justice Leveson's seminars, that it seems to me 2 that tabloid culture is so remorseless, its appetite is 3 so unable to be filled, that the people involved have 4 lost any sense that they're dealing with human beings. 5 When I was doing investigative journalism, I quite 6 often had to go and knock on the door of somebody who 7 was bereaved, but it wasn't because I wanted to know how 8 it felt. It was because I was writing about, you know, 9 say, the Yorkshire Ripper murders. I interviewed three 10 of the women who had been attacked by him and survived. 11 There was always a sort of purpose which I could explain 12 and say, "You may not want to talk to me. If you don't 13 want to talk to me, I'll go away." Actually, nobody did 14 say go away. 15 But I think this is very different. This is just -- 16 everything has become a story. We're all caricatures. 17 I've said this in my writing. We're all -- I think to 18 the tabloid press, we are just two dimensional. We're 19 just fodder for stories. 20 Q. Can I ask you to turn to paragraph 25 of your statement 21 onwards, where you dealing with press conduct more 22 generally. You explain that a number of articles have 23 been written about you over the years, including as 24 recently as December last year. These articles tended 25 to be, we've seen from them, about your relationship</p> <p style="text-align: center;">Page 39</p>
<p>1 A. I'm not sure there is one. I think -- I think that -- 2 from what I've been able to understand about 3 Mr Mulcaire's activities and the number of names in his 4 notebooks, I think it was -- it has been said that the 5 spying was on an industrial scale and I think almost 6 anybody -- this could happen to almost anybody. That's 7 the astonishing thing, that you don't have to be an 8 incredibly famous actor or actress. You don't even -- 9 you just have to be tangentially, you know, come into the 10 orbit of somebody who is well-known, and I think 11 probably that there is such a gap between the cultures 12 of the two parts of the press, the kind of what I think 13 of as the sort of serious press that I write for and the 14 values of the tabloid press, insofar as they have any, 15 that it wouldn't even occur to them to look at what 16 I was writing and actually think about the arguments. 17 Q. You've now had a few months to digest the information 18 that you may have had your voicemails illegally accessed 19 in this way. How do you feel about that now? You've 20 told us a bit about how you felt about having your phone 21 accessed at the time when Mr MacShane lost his daughter. 22 Have you had time to reflect? How do you feel about it 23 now? 24 A. I do think there is a sort of wider lesson to be drawn 25 from it, which -- I think I mentioned this at one of</p> <p style="text-align: center;">Page 38</p>	<p>1 with Mr MacShane. You say that as recently as December 2 2010, they wrote an article about that relationship, 3 despite the fact that it had ended some months earlier, 4 as I understand it. 5 Are such articles appropriate? 6 A. I think it -- it depends entirely on the context and it 7 seems to me that there is a difference between somebody 8 who is in the public eye, like a politician, say, who 9 makes, you know, what I would call traditional family 10 values a part of his or her political platform. If 11 somebody is saying the sanctity of marriage is very 12 important and people shouldn't have cohabitational 13 relationships or anything like that and they then kind 14 of pose with their family in their election literature 15 and so on, then I think maybe that's a different 16 situation. But the point is that neither Dennis nor 17 I ever kind of courted the press and invited them into 18 our lives. Quite the opposite. 19 On each of the occasions -- and this has gone on at 20 a low level for about 20 years. I've had phonecalls and 21 been approached by journalists and they always come in 22 this chummy kind of way and say, "Oh, can you tell us 23 about your relationship with so-and-so?" And I always 24 say to them: "I'm a journalist. If I wanted to put my 25 private life in the public domain, I could do it myself</p> <p style="text-align: center;">Page 40</p>

<p>1 and I'd get the facts right. So why would I need you as 2 an intermediary?" Because I always try to be fairly 3 polite but -- and I also think -- you know, in December 4 when I got this call, it was only a few months after 5 I had left Dennis and I -- I don't think that the 6 journalists who contact you realise that -- or care that 7 you're in quite a vulnerable state, you know, that 8 you're still processing all the feelings of a long 9 relationship ending and it's actually not very nice.</p> <p>10 I was in my gym. I actually had just been running 11 and I'd just removed all my clothes and my phone rang 12 and I got this person from the Mail saying, you know: 13 "Oh, Joan, we gather you and Dennis are no longer an 14 item", and I actually thought: what a wonderful metaphor 15 this is. You know, I'm naked before the tabloid press, 16 and why should I be?</p> <p>17 Q. Can I ask you this? Some people might say that the 18 press are entitled to write about the personal 19 relationships of public figures, such as MPs or 20 ministers, regardless of whether they make statements 21 about the virtues of family life and so on and so forth. 22 What would you say to that?</p> <p>23 A. I think it's the confusion of -- the old confusion of 24 not understanding the difference between what interests 25 the public and what's in the public interest. I think</p> <p style="text-align: center;">Page 41</p>	<p>1 you had to go to court and that it was listed and so on. 2 I think there is a quite interesting confusion there 3 between secret and private. I think Dennis probably -- 4 I don't want to speak for him, but I think he probably 5 regarded his divorce as a private matter and didn't go 6 around button-holing journalists and saying, "Oh, did 7 you know, I just got divorced", but I can't see how it 8 was secret.</p> <p>9 Q. The other article is the article you just mentioned, the 10 one where you were contacted whilst you were in the gym 11 and asked about your relationship, which had by then 12 ended. Can I ask you this question: did you complain 13 about either of those articles at the time?</p> <p>14 A. No, it never even crossed my mind.</p> <p>15 Q. Why did it not cross your mind?</p> <p>16 A. Oh, because I -- I've seen too many versions of press 17 regulation in this country, the Press Council and then 18 the current PCC, and I don't think that they are 19 adequate bodies to deal with this kind of problem, and 20 by the time -- by the time you complain to them, the 21 article's out there anyway and all your friends have 22 read it, so you're not going to get much in the way of 23 redress.</p> <p>24 Q. I have been asked to put one other question to you, and 25 it's about an article you wrote in the Evening Standard</p> <p style="text-align: center;">Page 43</p>
<p>1 that private life has become a commodity and there are 2 lots and lots of -- I mean, I wrote a whole book about 3 secular ethics and morality and I think there are -- 4 adults lead their lives in lots of different ways now.</p> <p>5 For example, I think that the legalisation of civil 6 partnerships for gay and lesbian people is a great 7 advance, and I also think that marriage should be 8 available to them, so I think adults lead their lives in 9 quite a sophisticated way now and they don't use one 10 model, and yet the tabloid press seems to sort of live 11 in a kind of 1950s world where everyone's supposed to 12 get married, stay married, and if anything happens 13 outside that, then it's a story.</p> <p>14 Q. Can I ask you about two articles you referred to in your 15 statement. The first is an article from the Mail on 16 Sunday on 19 June 2005. This is an article which you 17 should have in your exhibits. The headline is "Blair's 18 secretly divorced Mr Europe and the feminist who 19 believes marriage is redundant".</p> <p>20 Let's just deal, first of all, with that one. 21 That's obviously the one that was written confirming 22 that your relationship was happening. "Blair's secretly 23 divorced Mr Europe" -- was Mr MacShane secretly 24 divorced?</p> <p>25 A. I didn't know you could be secretly divorced. I thought</p> <p style="text-align: center;">Page 42</p>	<p>1 on 5 December 2001. I hope there's a copy in front of 2 you and I think it's been handed out this morning to 3 those who are present here.</p> <p>4 A. Yes.</p> <p>5 Q. This appears to be -- I'll paraphrase it -- an article 6 that you wrote in 2001 about Elizabeth Hurley and her 7 relationship with a gentleman called Steve Bing. I'm 8 not going to paraphrase the entire thing but you 9 obviously discuss the issue that was occurring between 10 the two parties at that time and set out at the end some 11 views.</p> <p>12 I've been asked to ask you this: you wrote about 13 Elizabeth Hurley and Steve Bing. You wrote about their 14 private life. If, as you say, the tabloids have become 15 overzealous about reporting on people's private lives, 16 why do you yourself write articles about celebrities' 17 private lives?</p> <p>18 A. Because I've been writing, since the 1990s, about the 19 mistake I think that celebrities make of putting too 20 much of their private life in the public domain. And of 21 course, I didn't doorstep them, I didn't ring them up, 22 I didn't ask them about their private life. They had 23 put that in the public domain. If you read the article, 24 what I'm saying in it is this is a dangerous thing to 25 do. I mean, I've said the same thing about the late</p> <p style="text-align: center;">Page 44</p>

<p>1 Princess Diana. It goes back to something I was saying 2 earlier, that people think they can put their private 3 life in the public domain and still control what's said 4 about them. 5 What worries me is that given the underlying 6 misogyny of the tabloids that somebody like -- at the 7 time, Elizabeth Hurley was pregnant and I thought that 8 she was in a very vulnerable state and there's such 9 a kind of underlying misogyny in the media that 10 I thought it was actually quite a dangerous track she 11 was on. If you look, you will see that I talk about the 12 kind of underlying unease that there is in our culture 13 of women who are beautiful and who base their careers on 14 their appearance, and the danger that they lose their 15 reputation, to use an old-fashioned word, and so I'm 16 always incredibly happy when I get a chance to smuggle 17 feminist ideas into the popular press. 18 Q. Thank you very much indeed. A few final questions. 19 You've explained in your statement that you have 20 considerable experience fighting for press freedom 21 across the world. You've told us about that. In light 22 of your experience, can I ask you this: you don't deal 23 with it in your statement but I want to know whether you 24 have any views on the current system of regulation. 25 Does it work and do you have any views on what you would Page 45</p>	<p>1 parents had sex and they can't resist peeking around the 2 door and hope that they might see it, and the rest of us 3 actually get on and live our lives, and I think that 4 obsession with sex and private life has become 5 remorseless and pitiless in terms of what it does to not 6 just celebrities and crime victims, but just ordinary 7 people. 8 Q. Thank you very much. Is there anything that you would 9 like to add? I don't have any more questions. 10 A. I don't think so. 11 Questions from LORD JUSTICE LEVESON 12 LORD JUSTICE LEVESON: I have a couple. 13 You've identified on a number of occasions the 14 ethics of what you've called the tabloid press, but is 15 there or should there be any difference to the ethical 16 considerations which are put into the work of reporters 17 by section of the media? 18 A. No. I don't think there should, and I think that's 19 a real problem. When I first started out as 20 a journalist, I wasn't particularly aware of any codes 21 of ethics, but I knew why I'd become a journalist. 22 I mean, you know, in a kind of young, idealistic way, 23 I wanted to change the world, and I thought that at 24 times it might be necessary to break the law. I mean, 25 during the Yorkshire Ripper investigation, I was Page 47</p>
<p>1 like to propose? 2 A. No, I don't think it does work. I'm very opposed to any 3 idea of state regulation and I'm completely opposed to 4 the idea of licensing of journalists. I think broadly 5 there are two things that need to happen. One is about 6 regulation, the other is about culture. In terms of 7 regulation, I think that there needs to be a kind of 8 successor body to the PCC which isn't dominated by 9 editors, which has more representation from outside. 10 I think that there ought to be things like -- 11 I think it ought to be if -- if newspapers don't take 12 part in it, then I think they should lose their VAT 13 exemption. So there should be a sort of carrot and 14 a stick for them taking part in it. 15 I think that there ought to be a much faster right 16 of reply. I think it should also take in mediation in 17 other situations like, you know, where libel might be 18 involved and so on. I think it needs to be a much more 19 complex and capable body. 20 But on top of that, I think what needs to happen is 21 a change in culture, and I think that we do have 22 a tabloid culture which I think is almost infantile in 23 its attitude to sex and private life. My impression is 24 that tabloid hacks go around like children who have just 25 discovered the astonishing information that their Page 46</p>	<p>1 threatened with an Official Secrets Act prosecution, 2 which didn't actually happen, but I think the two things 3 have diverged much too far, and it should be possible to 4 have, you know, a vibrant tabloid press which does the 5 kind of things that, say, the Daily Mirror did a few 6 decades ago when the tabloids saw themselves as 7 crusading papers, but I think that's not something they 8 see themselves as doing particularly any more, so there 9 is a separation which I think is very damaging. 10 A lot of the time people like me who write for what 11 I was talking about earlier as the serious or the 12 broadsheet press, I feel like a different breed from the 13 ethics -- the people who work on tabloid papers. 14 LORD JUSTICE LEVESON: The second question is this: you've 15 seen the material the police assembled from the Mulcaire 16 notebooks. Do you have any sense of whether you were 17 being targeted because of you or because you were 18 adjunct to Mr MacShane? 19 A. I think the latter. My kind of guess is that his 20 daughter's death made his profile much, much higher and 21 so they got interested in him, and once they got 22 interested in him, they got interested in me, so 23 I suppose I was kind of collateral damage. 24 LORD JUSTICE LEVESON: Okay. Thank you. Thank you very 25 much. Page 48</p>

<p>1 MRS PATRY HOSKINS: Thank you very much indeed. 2 Sir, I don't know if we need a short break before 3 the next witness just to allow this witness -- 4 LORD JUSTICE LEVESON: Yes, I think that's sensible. I'm 5 perfectly content just to let people have a break as and 6 when, and I'll say the same to witnesses who are coming. 7 This is not always an entirely pleasant ordeal. Thank 8 you. 9 (11.16 am) 10 (A short break) 11 (11.22 am) 12 MR JAY: The next witness is Mr Graham Shear, please. 13 MR GRAHAM JULIAN SHEAR (sworn) 14 Questions from MR JAY 15 MR JAY: Mr Shear, your full name, please. 16 A. Graham Julian Shear. 17 Q. Thank you very much. You too have provided a witness 18 statement which the Inquiry has seen. It is dated 19 8 November 2011. There's a statement of truth at the 20 end of that statement. Do you confirm the truth of that 21 statement? 22 A. I do. 23 Q. Thank you very much. First of all, I'm going to ask you 24 please to tell us a little about yourself, Mr Shear. 25 A. I'm a solicitor and partner at Berwin Leighton Paisner,</p> <p style="text-align: center;">Page 49</p>	<p>1 Q. -- as opposed to the fact of your individual case. Your 2 statement covers matters of opinion and hearsay evidence 3 on the one hand, but also direct evidence on the other, 4 and I'm going to deal first with the direct evidence, 5 which probably starts at paragraph 28, please. 6 You refer to the one incident when you arranged to 7 meet a client, who of course you are not going to name, 8 in the middle of a high profile crisis at a secret 9 location in Oxfordshire, and you were followed by 10 a reporter or photographer. 11 A. Yes. Over the years, I've acted on some extremely 12 high-profile cases, and it is a fact that I've become 13 quite well-known by those members of the press who are 14 interested in those cases, and that they would often 15 camp outside my office. Therefore if I wanted to have 16 or the client needed to have a private meeting, we would 17 often arrange to do it somewhere other than at my 18 office. 19 Q. Yes? 20 A. On this particular occasion, the subject matter was 21 extremely high profile and the whereabouts of the person 22 concerned were of interest to the media generally. 23 Q. Yes. 24 A. Often because -- and in this case I'm sure it was the 25 case -- because the picture was the thing that they</p> <p style="text-align: center;">Page 51</p>
<p>1 which is an international law firm based in the City of 2 London. I qualified in 1989. I practised initially 3 commercial law and then became a commercial litigator 4 and I am still today a commercial litigator. I have 5 a very broad and wide-ranging commercial litigation 6 practice with an area of specialism in both sports and 7 media work. 8 The first major case that I handled that brought me 9 into, I suppose, close contact with the media was when 10 I acted for Robbie Williams in the break-up of Take That 11 in 1995. During the latter part of the 1990s and into 12 or to the present day, I have acted for a broad spectrum 13 of the actors and actresses from the high profile acting 14 world, for sportsmen, sportswomen, especially Premier 15 League footballers, for celebrities, for politicians, 16 for a very broad range of those who could become or be 17 of interest to the media. 18 Q. And I think it's right that you are a claimant in the 19 voicemail interception litigation which is in the 20 Chancery Division to be heard by Mr Justice Vos 21 in January of next year? 22 A. That's correct. 23 Q. So you will understand that we cannot fairly discuss the 24 merits of your individual case -- 25 A. Understood.</p> <p style="text-align: center;">Page 50</p>	<p>1 wanted to publish. They wanted the current picture. 2 Q. Yes. 3 A. I spoke with the client, who was quite a long way away 4 from his normal residence, and we arranged for a meeting 5 place in the Oxfordshire countryside at a hotel. I have 6 absolutely no idea who followed me. The likelihood is 7 it was probably a member of the paparazzi or somebody 8 who was given the task by one of the newspapers or 9 general media concerned, but I was followed on that 10 trip. Unfortunately for the person who was following 11 me, I think they got lost somewhere behind me on the 12 journey so, as I say, I have no idea who the actual 13 person given the task was. 14 Q. Then you say in paragraph 29 -- this is before the phone 15 hacking scandal broke, as it were -- that clients often 16 said to you that they felt that the press were 17 monitoring their electronic communications. How often 18 did this happen, these fears being expressed? 19 A. I would say very regularly. Certainly in the period 20 from about, I suppose, 2004, 2005 onwards, clients began 21 to believe that coincidences were being replaced by more 22 likely interception of some form or another. I recall 23 quite clearly clients becoming irritated or frustrated 24 and suspicious that private information was finding its 25 way into the popular media, and they identifies this</p> <p style="text-align: center;">Page 52</p>

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<p>1 with -- you know, stray facts that they knew were only 2 privy to one or two people were being published. It 3 caused them to ask questions not only of their family 4 and friends but even of me. I recall it quite clearly. 5 Then it became so sort of continuous that I suppose 6 the suspicion that was directed at those that could have 7 leaked it began to become more focused in their own 8 minds about whether or not this information was being 9 obtained by surveillance and, you know, for a variety of 10 reasons, those that I acted for, some more than others, 11 became more used to changing their mobile telephone 12 numbers, would change them two or three times a year, 13 and that was a common way for people to, I suppose, give 14 themselves some confidence that perhaps there was a way 15 that they -- although they had no actual evidence or 16 basis other than their own suspicion, but could prevent 17 easy access to information about them. 18 Q. Yes. You refer to a specific incident in early 2008. 19 Can you tell us a little bit more about that, please? 20 This is paragraph 30 of your statement. 21 A. Yes. As I say, I've acted on a variety of high-profile 22 cases, and once again, this was an extremely high 23 profile matter where there were two participant -- or 24 clients involved and the press had different but equally 25 intensive interest in both of them. There was obviously</p> <p style="text-align: center;">Page 53</p>	<p>1 there was anybody who was following them, that they 2 could probably lose them in traffic or find some way to 3 make it to my home. 4 I recall very clearly the client saying, "Right, 5 we've left. Send me a text" -- in fact, I think he 6 said, "Send me a text", and I'd already left a voicemail 7 message for him of my home address and details of how to 8 get there, because he obviously needed to put it into 9 his Satnav and also I wanted to explain to him as to 10 which way was probably best for him coming from where he 11 lived or where they lived. 12 I remember very clearly being sort of at my front 13 door and sort of looking out because I wanted to be 14 there for when they arrived and I had space in my drive 15 for them to park their car, and -- I mean, I was quite 16 flabbergasted when about, I suppose, several minutes 17 before they arrived, two cars turned up with four or 18 five people in each car, that preceded them, and sort of 19 parked sort of at one end of my street and one a little 20 further down, to then have, a few minutes later, as 21 I say, the clients come up. 22 So it was absolutely clear to me that the paps or 23 media concerned were well aware of where they were going 24 to, and yet only I was privy to that information because 25 I'd left the message and sent the text to the clients</p> <p style="text-align: center;">Page 55</p>
<p>1 a connection between them. 2 The increase in interest had got to a point of 3 almost fevered activity, and their house had been 4 surrounded by the press for several days. It was 5 because of events then occurring and concern over events 6 that could occur that they needed to seek advice from 7 me, both as a lawyer and also some common sense advice, 8 hopefully as well. 9 LORD JUSTICE LEVESON: Is there a difference? 10 A. Sorry? Occasionally -- occasionally, the clients need 11 to be told the realities of what can occur as well as 12 the legal advice of the circumstances in which they find 13 themselves. Hopefully, I provide a blend of both. And 14 they wanted to come and see me and we knew that if 15 I went to them, then that would automatically -- 16 I suppose not just accelerate but heighten interest, and 17 if they came to my office, once again that would become 18 an obvious point of focus for the media and a media 19 scrum would develop. 20 The idea was -- and it only arose literally an hour 21 or so before the meeting -- was I suggested to them that 22 if they could get out of their house, that they should 23 come to my house, because the media didn't know where 24 I lived, and they thought that was a pretty good idea 25 and they lived out in the country and they felt that if</p> <p style="text-align: center;">Page 54</p>	<p>1 and only they were privy to it. So it was quite an 2 extraordinary event, which was followed by, obviously, 3 quite intensive interest in what was happening inside my 4 house for the rest of that day and a media scrum outside 5 for many hours. 6 Q. Yes. Of course, everything that was happening within 7 your house was protected by legal professional 8 privilege, it goes without saying. 9 A. Yes, it was. It was a -- it was -- it was a private 10 time not only for the clients so far as circumstances 11 that related to them, but it was also a matter for them 12 to seek and obtain legal advice, which is obviously 13 professionally privileged, legal professional privilege. 14 Q. Of course. You were so concerned that you tell us in 15 paragraph 32 you wrote specifically to the 16 Information Commissioner's office and to the 17 Metropolitan Police, and you give the dates -- 2008, 18 2009 -- listing your clients, and indeed your own name 19 was on the list, with a general enquiry in relation to 20 phone hacking. You say at the end of paragraph 32 the 21 response from the police and the 22 Information Commissioner was negative. Are you saying 23 by that that they didn't reply to your letter or are you 24 saying that by that they did reply and say that you and 25 your clients were not the subject of phone hacking?</p> <p style="text-align: center;">Page 56</p>

<p>1 A. Well, I became interested in the development of the 2 information that came out of the various criminal trials 3 that had taken place, but I asked the clients, I suppose 4 in around about 2007, would they like to take matters 5 forward. By 2008, a number of them had indicated that 6 they did. Some didn't, actually. Some preferred or 7 felt that they could suffer recrimination or further 8 interest by the media by pursuing an action and decided 9 that they actively didn't want to pursue it.</p> <p>10 So as you say, or as I have said, in around about 11 2008, 2009, I sent a long list of clients' names, at 12 their request, to both the police and to the 13 Information Commissioner. I included my name on it as 14 just a -- it was actually a suggestion of one of my 15 partners that I may be collaterally interested in -- to 16 them and could have been subject.</p> <p>17 So when I received the response -- and I did receive 18 a response from both the Information Commissioner and 19 from the Metropolitan Police -- the responses were 20 specifically: no, no information had been found on any 21 of the names contained on the list. I reported back to 22 the clients and said no information, and at the time 23 I recall thinking: well, there's two circumstances. 24 Either there were -- all of the data and evidence had 25 been collated and reviewed and no names had been found,</p> <p style="text-align: center;">Page 57</p>	<p>1 relation to other clients, but I immediately recognised 2 the contents of voicemail messages that had been left 3 for me and conversations that had followed those 4 messages.</p> <p>5 They were slightly cryptic but the detail was very 6 clear and it related to information and advice that I'd 7 given to a client and to others who were advising him in 8 relation to a case where I was acting for that client on 9 a regulatory matter.</p> <p>10 Q. I think News International will want me to say, although 11 I'm not going to contradict anything you've just said, 12 that what you've just said is or may be an issue in the 13 civil proceedings.</p> <p>14 A. I understand that, and obviously I've spoken to -- or 15 I'm aware that those that left the messages for me also 16 recall what was said at that time as well, but 17 I appreciate that it's in contest.</p> <p>18 LORD JUSTICE LEVESON: Let me just understand that. In 19 relation to the advice that you had given, are you 20 saying that was left on a voicemail message?</p> <p>21 A. No. I was actually in the hearing at the time, and I -- 22 the way in which it worked was that I would leave 23 messages for those who were representing my client and 24 they left messages for me, and they also received 25 contact from third parties -- in this case, it was</p> <p style="text-align: center;">Page 59</p>
<p>1 or they hadn't finished the review, and the third option 2 was that actually not all of that evidence which related 3 to misconduct by the News of the World had actually been 4 retained and considered.</p> <p>5 But I reported back to the clients and some of them 6 were -- I suppose felt that it was unlikely that they 7 had not been the subject of some form of unlawful 8 surveillance, and others were actually very pleased that 9 their names didn't appear.</p> <p>10 It was with some surprise that in the early part of 11 this year -- it was about the end 12 of January, February -- that I was contacted by officers 13 from Operation Weeting who asked to come see me to talk 14 to me about a number of my clients who -- whose names 15 did appear in the evidence that had been reconsidered or 16 reviewed by Operation Weeting, and they came to see me 17 and started to go through the process.</p> <p>18 Q. Yes, and were you shown relevant pages from the Mulcaire 19 note book which related to you?</p> <p>20 A. I was. Actually, it's become almost a regular event. 21 A specific officer was assigned -- Michelle Roycroft(?) 22 was assigned to me and to my clients, and I was shown 23 the information that related to my name and the detail 24 of that, and it jumped out of the page at me, actually, 25 although it wasn't quite as specific as I now know in</p> <p style="text-align: center;">Page 58</p>	<p>1 actually from a journalist -- and they left a very 2 detailed message for me about what the journalist --</p> <p>3 LORD JUSTICE LEVESON: So it's all messages?</p> <p>4 A. It's all messages and journalists left messages for me 5 as well. So yes, it's messages to and from.</p> <p>6 MR JAY: You refer specifically to one incident in 7 paragraph 36 advising a footballer in relation to 8 regulatory proceedings.</p> <p>9 A. Yes. That's to what it relates.</p> <p>10 Q. Thank you. May I move back in your statement now, 11 please, Mr Shear, and this is -- you're dealing with 12 your opinions. You express a general opinion about 13 tabloid conduct under the rubric which mentions 14 paragraph 4 and the commercial pressures. In your own 15 words, please, what are those pressures operating at the 16 moment?</p> <p>17 A. I believe it's a business model that's become almost 18 dependent and infatuated with sensationalist and 19 titillating stories, to the point where the facility 20 that -- and this is just my opinion, as I say -- that 21 phone hacking or unlawful surveillance provided allowed 22 those that were utilising it and reviewing the 23 information to not only build their stories but to pad 24 them out with detail, and this coincided with the 25 financial benefit that a newspaper could have from</p> <p style="text-align: center;">Page 60</p>

15 (Pages 57 to 60)

<p>1 providing a diet of easily digestible, sensationalist 2 sort of fodder on a regular basis. 3 It's been a progression of sort of fairly sort of, 4 I suppose, privacy-invading but interesting to a section 5 of the public intrusion into the private lives of the 6 rich and famous, powerful or others that has kind of 7 created this sort of self-generating process where 8 people want to see or hear of the next event. 9 Q. Yes. 10 A. So that's -- that's what I've seen, that's how I've seen 11 it develop. 12 It certainly was not quite as prevalent in the same 13 sort of guise in the mid-1990s. I think it became more 14 organised and more orchestrated as we sort of turned 15 into the early part of 2000. Certainly the 16 News of the World was out in front as the most effective 17 story-gatherer, and certainly quite a bit of daylight 18 appeared between News of the World and the other papers 19 with whom they competed. 20 I think that the types of surveillance that were 21 being undertaken are unlikely to have been isolated to 22 one newspaper, purely because of the movement of 23 journalists between the different newspapers. I mean, 24 there aren't that many newspapers as employers out there 25 who would be available for the journalists to work for,</p> <p style="text-align: center;">Page 61</p>	<p>1 calculation. I think the PCC as a body, although there 2 are areas -- and I'll come back to them -- there are 3 areas where I think they're effective, generally 4 speaking, the PCC, as I perceive them, their role is one 5 of mediator. They're not a regulator, they have no 6 power to investigate and I think that without being 7 empowered and having the teeth to appropriately 8 investigate and to regulate the members of the media, 9 they're an ineffective body. 10 It doesn't just come down to investigation and 11 regulation. I think there's also an issue here of 12 training, and where one has a sort of a systemic loss or 13 dilution of ethics to the extent that we've seen at the 14 News of the World -- and as I say, I don't believe 15 that's really isolated to just that paper -- I think one 16 has to question the extent to which the journalists have 17 been trained about the requirements upon them and the 18 obligations upon them and their employers to act 19 ethically. I think that an element that should also be 20 introduced into any body that replaces the PCC or any 21 enhancement to the PCC's powers is a requirement for 22 appropriate training or ongoing training for the 23 journalist to enhance the ethical conduct. 24 So far as the one area where I do think the PCC have 25 been effective is that they have provided an</p> <p style="text-align: center;">Page 63</p>
<p>1 and it's -- I was certainly aware of significant 2 movement in the early part -- early/mid part of the 3 2000s, I suppose from 2003 to 2005, of journalists from 4 some newspaper groups specifically to the 5 News of the World. 6 Q. One theme that the Inquiry has received, it came through 7 the seminars but also in evidence which has come in from 8 the press, is that the model you're giving us is 9 entirely incorrect, that whereas it might have been true 10 to some extent in the 1980s and early 1990s, the effect 11 of the PCC is to improve press behaviour and therefore 12 you're giving us a stereotypical view, no doubt 13 bona fide, they would say, but it's completely wrong. 14 Do you want to comment on that? 15 A. I don't accept that at all, actually. I think that the 16 press are extremely adept at identifying and calculating 17 opportunities and then exploiting them, whether it be 18 from chequebook journalism and the persuasion of young 19 girls to sell their stories on a sort of regular basis, 20 all the way through to identifying which stories to 21 alert the target of that relates to private information 22 pre-publication and which stories to leave to the 23 potential risk of post-publication damages. 24 In that sense, the PCC is certainly no match for 25 that kind of organised and focused financial</p> <p style="text-align: center;">Page 62</p>	<p>1 anti-harassment phone line and I think that is quite an 2 effective facility, and I myself have actually, on 3 occasion, recommended that clients that were concerned 4 about doorstepping utilise that helpline, and I know 5 they've done a good job with that. But I'm afraid so 6 far as broader regulation or investigation is concerned, 7 the PCC, today and yesterday, is certainly no match for 8 the larger and effective media organisations to whom 9 they are meant to mediate for. 10 Q. In terms of the kiss and tell stories you mentioned in 11 paragraph 8 of your statement, do you have personal 12 knowledge of the amount of sums of money which pass 13 hands between newspapers and these women for the 14 purchase of these stories? 15 A. I have had accounts from several young women concerned. 16 I think there was a tariff that almost evolved over 17 time, some of it on a competitive basis between the 18 different newspapers, because obviously if the story was 19 particularly high profile, the target person was of 20 particular interest or the young lady had an effective 21 agent -- and some of them did have very good agents who 22 would increase the temperature and amount for an auction 23 for that kiss and tell story. That tariff, as I say 24 here probably went for something like 10,000 for the 25 most innocuous up to half a million. The upper end of</p> <p style="text-align: center;">Page 64</p>

<p>1 that, or the number I give at the upper end of that, is 2 slightly anecdotal. I have heard accounts of people who 3 have been involved in the most high-profile cases -- for 4 example Rebecca Loos and others -- who have been paid 5 very large sums for their stories. But the young ladies 6 concerned became aware that there was a tariff, and as 7 I mentioned in my statement, there's certainly a group 8 of repeat performers, if I can put it that way, who 9 became fairly regular kiss-and-tell girls, who obviously 10 took advantage of that and I do believe that -- well, 11 I know on certainly more than one occasion, clients of 12 mine have been faced not only with the prospect of being 13 alerted that the newspapers had a kiss-and-tell girl, 14 but also that that young lady would, if she were paid 15 more money, not sell her story, and that in itself 16 often, certainly on more than one occasion, appeared to 17 be an orchestrated attempt to persuade our clients to 18 actually pay off the young ladies, which in itself could 19 become an enhanced story, almost in a form of 20 orchestrated blackmail.</p> <p>21 So, you know, the supplement to the standard 22 kiss-and-tell story I think occurred around 2006, 2007, 23 where there was an appetite to kind of move it away from 24 the standard to something a little more interesting, 25 and, you know, even the readers of our regular Sunday</p> <p style="text-align: center;">Page 65</p>	<p>1 publication on a Sunday. It ordinary involved either 2 material that was potentially defamatory and the 3 newspaper was looking to balance out their risk by 4 putting the story to the target's lawyers, or 5 alternatively it concerned material that was of 6 a private nature and they were trying to assess what, if 7 any, resistance they would receive.</p> <p>8 In order to enhance and regularise their approach to 9 me, I would send out a list of all of my clients with 10 a notice basically saying that if you have any material 11 which you intend to publish, please put it to us first 12 because it gives us the right of response, and certainly 13 up until, I suppose, the last few years, the journalists 14 and the legal departments would put that material to us. 15 But over time, what's actually happened is two things. 16 Firstly, the amount of damages that were awarded in 17 relation to defamation, to libel generally, has reduced. 18 So I suppose when one goes back in time to the Elton 19 John cases, they were the last of the very high damages 20 awards. So it's been on a sliding scale coming 21 downwards, and the maximum amounts that have been 22 provided by way of damages in relation to breach of 23 privacy have been relatively modest. If a newspaper or 24 a media organisation can calculate the financial 25 consequences post-publication, they can also calculate</p> <p style="text-align: center;">Page 67</p>
<p>1 and daily tabloid papers needed some variety and I think 2 that's partially what occurred.</p> <p>3 Q. You go so far as to say in paragraph 12 that in your 4 view, the tabloids consciously calculate the financial 5 risk of publishing a story. I suppose that would 6 include, in relation to a kiss-and-tell story: "It would 7 cost us X to buy the story, that will yield us 8 additional circulation of Y and therefore there is 9 a financial benefit", but have you any evidence for that 10 apart from speculation?</p> <p>11 A. Well, I think it's about the progression of behaviour. 12 I had very good working relationships with most of the 13 national newspapers. I was probably, and still am, one 14 of their principal adversaries, and you know, it's not 15 just a question of whether or not you're an adversary on 16 a weekly or daily basis but you have to behave 17 adversarially all the time. We did have good 18 relationships, and during the early part of this 19 century, 2000 up until 2008 and 2009, even -- I suppose 20 even now occasionally, the papers were -- would 21 occasionally alert us to a story that they were going to 22 publish, and that was certainly more prevalent the 23 further one goes back than it is currently. So we would 24 be contacted, perhaps on a Thursday or Friday, in 25 relation to a story that was being developed for</p> <p style="text-align: center;">Page 66</p>	<p>1 whether or not the benefits of publishing the story 2 without actually approaching the target or their lawyers 3 first outweigh the risk or financial consequences of 4 awards against them, and even costs post-publication.</p> <p>5 So what I have seen is a reluctance by the media 6 generally to put stories pre-publication and to stand 7 back and await the fallout, if you like, after 8 publication.</p> <p>9 That has two effects. Firstly, some people view it 10 as once the stable door is open and the private 11 information is in the public domain, what's the point in 12 litigating after the event? It only reinforces and 13 reminds the reader, and those who perhaps didn't even 14 read the information, about the private information, so 15 there's a natural deterrent post-publication, in some 16 people's minds, to commence proceedings.</p> <p>17 Secondly, so far as defamatory material is 18 concerned, I suppose there is an easier outcome for the 19 defendants in any action post-publication, and that is 20 to make an offer in order to satisfy the claim.</p> <p>21 So certainly so far as private information is 22 concerned, I've detected and seen a reluctance over the 23 last few years by the media to actually put stories 24 pre-publication.</p> <p>25 Q. Yes. That's helpful, Mr Shear. It appears to us the</p> <p style="text-align: center;">Page 68</p>

<p>1 distinction between stories which are private and true, 2 where there's a pure privacy issue, and stories which 3 are private and untrue, where there's a privacy issue 4 and a defamation issue. 5 A. Yes, there is a technical distinction between the two. 6 Q. Yes. 7 A. David Sherborne, who I've instructed, as I have Hugh 8 Tomlinson, and I have debated over the last ten years as 9 to the effect or the potential to bring privacy actions 10 where there is the notion of false privacy, where in 11 order to contest the information, the private 12 information, you have to reveal some private 13 information, and therefore whatever one does, by 14 contesting it, one is opening one's private life to 15 inspection by others in circumstances where you would 16 not ordinarily wish to do so. 17 And you're right that that overlaps with the 18 potential for defamation proceedings as well, because 19 obviously the consequence of false privacy or false 20 information is a claim in defamation after publication. 21 Q. Yes. Can I deal with the perhaps the pure privacy point 22 and the genie out of the bottle issue, and that locks in 23 with the issue of pre-notification. Of course, if the 24 target is given the chance to apply for an injunction, 25 that which is in the bottle has the chance of remaining</p> <p style="text-align: center;">Page 69</p>	<p>1 of the application. We see the judgments in the 2 contested damages cases, of which there are quite a few. 3 But is the position this: that the High Court judge will 4 wish to see demonstrated a clear public interest in the 5 breach of privacy? 6 A. Certainly. Let me be absolutely clear about this. 7 Seeking and obtaining an anonymity order is no easy 8 thing. They are extremely hard fought. Those on the 9 opposite side, our adversaries at the media, do not take 10 them lightly, and the judges who hear the application 11 want to be assured that the individual's rights have 12 been fully engaged, firstly. That's the most obvious 13 point, whether or not there is an inherent right to 14 privacy in the information which the section of the 15 media is seeking to publish. 16 The second point is whether or not the balancing act 17 in relation to public interest has been outweighed by 18 the press' desire for freedom of expression, and 19 appropriate freedom of expression, or alternatively the 20 individual's rights. Don't get me wrong with this. 21 I echo the last witness's sentiment that for us to live 22 in a democracy of the type that we all desire to live 23 in, we need a strong and effective and free press, and 24 I believe that that balancing act in relation to public 25 interest is an absolutely vital part of the process, and</p> <p style="text-align: center;">Page 71</p>
<p>1 there. From your own personal experience, are you able 2 to say how often this opportunity is now being given to 3 clients of yours? 4 A. Increasingly rarely. I think it's proportionate to the 5 size and nature and possible impact of the story. The 6 bigger the story, the less likely the opportunity is 7 given. I've run probably as many, if not more than any 8 other -- I've run more pre-publication anonymity 9 injunctions or -- than possibly any other lawyer in the 10 area, or have started to commence them and have 11 newspapers back down. I would say at one point we were 12 looking at or in confrontation with the larger newspaper 13 groups almost every weekend -- and it is more at 14 weekends than during the week because the Sunday 15 tabloids have more of an opportunity to build up a story 16 and ordinarily a larger budget to do so. 17 Over the last few years, that's receded 18 dramatically, and it's not just the coincidence of this 19 Inquiry and the prominence of the phone hacking 20 scenarios; it's more about a change in behaviour and 21 a reluctance to be, if you like, knocked off a story by 22 the media generally. 23 Q. Yes. It might also depend on how High Court judges are 24 responding to these applications, and of course we don't 25 get much of a sense of that because of the very nature</p> <p style="text-align: center;">Page 70</p>	<p>1 it is, as I say, hard fought, but almost invariably, 2 certainly with respect to the sensationalist and 3 titillating stories which we've spoken about, it's very, 4 very hard, if not occasionally impossible, to detect 5 a public interest rather than a sort of faint interest 6 by the public in being titillated and inserting 7 themselves into the private lives of celebrities. 8 I'm afraid that that's the sort of background as to 9 how those injunctions occur. If one can demonstrate 10 those two ingredients, then one has a fighting chance of 11 persuading a High Court judge that an anonymity order is 12 appropriate. 13 Q. Thank you. In paragraph 14 and following of your 14 statement, you deal with a specific matter which arose 15 in 2003. 16 A. Yes. 17 Q. An alleged rape incident. Is there anything you wish to 18 add to that or highlight, Mr Shear? 19 A. I suppose it's an example of how a newspaper might seek 20 to bring into the public domain information about which, 21 if they brought into the public domain themselves, they 22 would suffer either risk of defamation actions or risk 23 of privacy actions, and I suppose in that particular 24 instance, the individual involved was -- I used the 25 expression there "vilified", because he was unwilling to</p> <p style="text-align: center;">Page 72</p>

1 participate in or to condone intrusion into his private
 2 life and therefore whilst he was a high profile
 3 footballer, at the same time he wanted to retain
 4 a private life, and the newspapers didn't appreciate
 5 that he would contest that -- their intrusion, and in
 6 this particular instance or circumstance -- I can give
 7 you some details because there's quite a lot in the
 8 public domain already.
 9 Q. Yes, there is.
 10 A. There were a group of footballers who were staying at
 11 the Grosvenor House Hotel. They were the subject of
 12 a complaint by a young lady that she had been sexually
 13 assaulted and raped. I acted for the footballers
 14 concerned. Unfortunately for one of my clients, he was
 15 also staying in the hotel and was probably of more
 16 interest and had a higher profile than the other
 17 footballers and was the vilified footballer who
 18 I mentioned a few moments ago. There was a -- I think
 19 a clear focus by the newspapers to identify him as being
 20 the likely potential accused, if you like, and to bring
 21 his name into the public domain, by inference and
 22 suggestion, by the placing of stories and pictures in
 23 close proximity to the articles as they were published.
 24 I mean, this was as very high profile event that was
 25 front-page news for several weeks. There didn't seem to

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1 be much interest in actually identifying whether or not
 2 he was -- it was appropriate for him to be brought or
 3 his name to be brought out in this fashion, and we let
 4 it be known that he was not actually present at any
 5 event about which he could be -- should be of any
 6 concern to him or interest to them, but they went ahead
 7 and inferred his involvement and we subsequently sued
 8 and -- we subsequently sued and the matter was --
 9 Q. Was resolved.
 10 A. -- was resolved.
 11 Q. Yes. So in the end it was the law of defamation which
 12 provided the resolution?
 13 A. Yes. I think that there was a point where so many
 14 people were -- there was so much in the way of
 15 suggestion and inference that his name was being bandied
 16 about as the likely instigator or perpetrator, and it
 17 was being traded on the Internet, and so he felt that he
 18 had to come out and actually clear his name voluntarily.
 19 And you know, not only is it embarrassing in that
 20 circumstance; people actually remember the wrong part of
 21 the story as well as the right part of the story, for
 22 his activity and for his willingness to come out and
 23 say, firstly, "I was not involved and they've tried to
 24 involve me", and secondly also for his -- I suppose his
 25 willingness to pursue the media after the event, he for

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1 many years after the case was resolved became the
 2 subject of unwarranted attention as well, almost on
 3 a vindictive basis by many sections of those newspapers
 4 that were the subject of our proceedings.
 5 Q. You refer to the issue of what you call revenge-fuelled
 6 attacks in paragraph 23, and you mention a specific case
 7 which, for obvious reasons, you can't delve into the
 8 detail of. This is paragraph 24. You do refer to
 9 a three-year campaign by the press, which presumably
 10 followed the libel settlement. This is paragraph 25.
 11 A. Mm.
 12 Q. I know it's going to be difficult to give examples
 13 without revealing perhaps the identity of your client,
 14 but is there anything more that you can say about that
 15 on a sort of anonymous basis?
 16 A. I think that this particular instance was particularly
 17 disgraceful, actually. I think that the notion that
 18 they had any belief in the integrity of the story was
 19 completely set aside by what we learnt later on. This
 20 appeared to be an opportunity by newspapers generally to
 21 buy a video which contained supposedly explicit
 22 material. The newspaper concerned decided not to buy
 23 the video but publish an unsubstantiated story which did
 24 not seek to identify but only create speculation about
 25 our client.

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1 We -- the way in which they did it was intended to
 2 either identify him for the benefit of those who were
 3 able to reconstruct a pixelated image by
 4 cross-referencing it on -- it was pixelated with a
 5 silhouette -- by cross-referencing against photographs
 6 that were published in other media and therefore, if you
 7 like, bring in his name.
 8 What they didn't appreciate is that jigsaw
 9 identification is actionable. We contested it and the
 10 consequences of that is that not only was he, I suppose,
 11 a general target of interest because of his ability and
 12 talent as a professional sportsman, but also in other
 13 areas, but there was definitely an element of
 14 a revenge-fuelled fervour, because there seemed to be
 15 a desire to, if you like, dish out retribution and they
 16 were determined to prove something that was damaging to
 17 his reputation or to his private life as part of the, if
 18 you like, the quid pro quo of having the temerity to
 19 take on the national media in those circumstances.
 20 And, you know, if any person is put under
 21 a microscope, an intensive microscope, and if there are
 22 large amounts that are being bandied about for the
 23 provision of information, the old style chequebook
 24 journalism, together with, if you like, the focus and
 25 intensity of targeting a personal, together with the --

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<p>1 what appears to be a systemic approach to surveillance 2 with phone hacking and other facilities, provides some 3 results, and those results were certainly exploited 4 beyond what was, I feel, appropriate or even vaguely in 5 any form of public interest scenario. So it's 6 excessive.</p> <p>7 Q. You have assisted the Inquiry with analysis, from your 8 perspective, of the business model of newspapers and the 9 risks they take, you say, with the calculation, 10 conscious or otherwise, that in the end circulation 11 figures were be increased and that will cover any 12 damages in defamation or privacy they might have to pay. 13 May I ask you, though, about the business model of 14 solicitors' firms such as yours, because this is a point 15 which I'm sure the press would wish me to make of you. 16 Is it right that in many of these cases you work on 17 conditional fee arrangements with your clients?</p> <p>18 A. On some, yes, I do. I've only done so for the last, 19 I suppose, four or five years maximum. It's -- I did it 20 for -- I started to do it for two or three reasons, and 21 it's not only in the area of media or privacy-related or 22 defamation-related work. I do it in other areas. 23 It's to, if you like, balance out the power quotient 24 between the parties who are adversaries. It's also to 25 utilise the potential of risk and also, if you like, to</p> <p style="text-align: center;">Page 77</p>	<p>1 out of hand, to use the vernacular, very soon, and 2 therefore the newspaper calculates, even with 3 potentially defensible cases, that they are almost 4 compelled to settle those rather than fight them because 5 the risks are now disproportionately high. Isn't that 6 right?</p> <p>7 A. No. I don't accept that for a moment. 8 Let's look at a case -- for example, you mentioned 9 the highest case at £60,000. That's no more than sort 10 of a very gentle parking fine in proportion to the 11 turnover and the financial returns on publishing very 12 high-profile stories. If one puts it into some form of 13 a context, the highest damages award at 60,000 does not 14 really compare to the premium being paid to the 15 kiss-and-tell girls at the end of the story provision 16 equation. If the newspapers feel, as they should do on 17 quite a high proportion of the cases, that they are at 18 risk of losing on a case, then they clearly have the 19 opportunity to settle that case by making a sensible and 20 appropriate and proportionate offer in settlement. 21 Now, if they do that early, then the consequences of 22 CFA do not actually bite upon them as to the adverse 23 costs or the escalation of the adverse costs. Let's 24 also be clear about this: the maximum consequences to 25 a newspaper are double, so it's 100 per cent uplift if</p> <p style="text-align: center;">Page 79</p>
<p>1 create a dialogue between the solicitor who's acting for 2 my adversary and that adversary, so that whether it's in 3 a commercial case or whether it's in a media or 4 defamation case, that dialogue about the consequences of 5 pursuing a defence in an action are often brought home 6 very clearly when there's a discussion about finances 7 that are involved, and I've noticed that those cases 8 where there is the -- a CFA, conditional fee agreement 9 in place are often more likely to settle, not because 10 the opposing party is concerned about whether or not 11 they're actually going to win or lose the case, but it's 12 more about actually accelerating and bringing earlier in 13 the action that consideration of whether or not it's 14 worthwhile elongating the case and continuing the 15 defence because if they lose they're going to -- the 16 costs will increase.</p> <p>17 Q. If I put the point of view of the opposing party. 18 Imagine this scenario. You've told us that damages in 19 privacy cases are not particularly large. The largest 20 that's been awarded is £60,000.</p> <p>21 A. Mm-hm.</p> <p>22 Q. Imagine a case where the opponent, the claimant, is on 23 a 100 per cent CFA. A commercial firm such as yours, 24 obviously you will employ appropriate counsel to 25 represent the client. The legal costs are going to get</p> <p style="text-align: center;">Page 78</p>	<p>1 all of those on the other side, including the solicitors 2 and the barristers, are all on 100 per cent uplift, and 3 the case is found to warrant 100 per cent uplift. But 4 I can tell you I've done cases that are CFA-based and 5 I've taken them to assessment as well as they ordinarily 6 go to assessment, and actually, as in most litigation, 7 the courts only award something in the region of 65 to 8 75 per cent of the costs on assessment to the winning 9 party, and therefore there is a heavy dilution to the, 10 if you like, 100 per cent uplift in any event.</p> <p>11 Really, the risk to the newspapers of a CFA biting 12 are only restricted to those cases where they actually 13 lose them. I do not believe there is a real deterrent 14 factor there where they have a significant prospect of 15 losing. Really, any litigant, where they have a case 16 where they believe that they have a less than 17 50 per cent chance of winning that case, should really 18 be settling out in any event.</p> <p>19 Q. Okay, Mr Shear. Approximately how many cases over the 20 last few years in this area have you done on a CFA? 21 Approximately?</p> <p>22 A. Excluding the phone hacking cases that we're conducting 23 at the moment, no more than a handful. Maybe six or 24 seven.</p> <p>25 Q. Have you lost any of those?</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 A. No.</p> <p>2 Q. Can you give us some idea of the --</p> <p>3 A. Sorry, can I just interject? You will appreciate that</p> <p>4 when one assesses whether a CFA is appropriate to enter</p> <p>5 into as a solicitor, we weigh up the merits of the case</p> <p>6 very carefully, because we're taking a significant risk</p> <p>7 in investing our time --</p> <p>8 Q. Of course.</p> <p>9 A. -- into that case. So I wouldn't take a case which</p> <p>10 I didn't believe was likely to have good or very good</p> <p>11 prospects of success, and so therefore one would only</p> <p>12 choose an appropriate case to enter into a CFA on.</p> <p>13 Q. That's very sensible. Unless there's no doubt about it,</p> <p>14 the risk assessment is carried out the solicitor and, if</p> <p>15 appropriate, counsel before any significant work is</p> <p>16 done, but enough work for you to evaluate whether it's</p> <p>17 a good, bad or indifferent case. That's right, isn't</p> <p>18 it?</p> <p>19 A. Yes.</p> <p>20 Q. And your policy, probably quite prudently, is only to</p> <p>21 take cases which have a better than 50 per cent chance;</p> <p>22 is that correct?</p> <p>23 A. Correct.</p> <p>24 Q. From the newspapers' perspective, if you imagine the</p> <p>25 uncertainties of litigation, we can all see cases which</p> <p style="text-align: center;">Page 81</p>	<p>1 the necessity to maintain arms at every single battle,</p> <p>2 even though they may look like cases that shouldn't be</p> <p>3 contested, and I think that's also pervaded through to</p> <p>4 the way in which they've then, if you like, published</p> <p>5 either the story or recrimination in relation to the</p> <p>6 consequences of their publication, whether it be</p> <p>7 defamation findings against them or privacy findings</p> <p>8 against them by either seeking to vilify the High Court</p> <p>9 judges who have heard those cases, or the participants</p> <p>10 in the action in further targeting them later on.</p> <p>11 So it kind of blends through it. I don't think</p> <p>12 there's necessarily a totally rational view with which</p> <p>13 some of these cases are -- in which the media have</p> <p>14 continued to contest them is maintained.</p> <p>15 Q. Yes. It's right to say, though, in relation to CFAs,</p> <p>16 two things. First of all, they're under close scrutiny</p> <p>17 following Lord Justice Jackson's report, which we know</p> <p>18 about.</p> <p>19 A. Mm-hm.</p> <p>20 Q. And secondly, as I mentioned this time last being, there</p> <p>21 is jurisprudence in the European Court of Human Rights,</p> <p>22 Miller v MGN, I think, which specifically say on the</p> <p>23 facts of that case -- it was Naomi Campbell's case --</p> <p>24 that there was a breach of article 10 of the Convention</p> <p>25 in relation to CFAs. So these are all matters which</p> <p style="text-align: center;">Page 83</p>
<p>1 are stone cold winners, stone called losers, but many</p> <p>2 cases fall in the middle, the 40 to 60 per cent chance</p> <p>3 of success bracket. The existence of a CFA agreement</p> <p>4 will cause a prudent newspaper to be more cautious in</p> <p>5 relation to litigation and at least possibly to adopt</p> <p>6 a more defensive approach and settle it earlier.</p> <p>7 Wouldn't you agree with that?</p> <p>8 A. Not necessarily. I believe that there has, over the</p> <p>9 last few years, I suppose, since the evolution and</p> <p>10 development of privacy law in this country and the</p> <p>11 passing of the Human Rights Act, been a slightly strange</p> <p>12 attitude and an opaque view about what is and what is</p> <p>13 not in the public interest, and this sort of devotion to</p> <p>14 promoting a right to publish because of role models and</p> <p>15 hypocrisy became a sort of a ready mantra, and I think</p> <p>16 it's pervaded through the decision-making process. So</p> <p>17 even where there is a clear case where private</p> <p>18 information has been utilised and disseminated and that</p> <p>19 actually it looks like -- it looks pretty clear that</p> <p>20 there was no proper public interest ground upon which</p> <p>21 the media went on to publish it, because they haven't</p> <p>22 been able to identify evidence or submit that evidence,</p> <p>23 they've still gone ahead and contested the cases.</p> <p>24 I think it's partially because they see it as not</p> <p>25 just one battle but an ongoing war, and that they feel</p> <p style="text-align: center;">Page 82</p>	<p>1 will need to be considered.</p> <p>2 May I touch on, though, one aspect of the public</p> <p>3 interest and suggest that in the cases which fall in the</p> <p>4 middle of the spectrum, there are quite difficult</p> <p>5 judgmental issues.</p> <p>6 We can quite see cases on one end of the spectrum</p> <p>7 where -- I'm giving you a hypothetical case --</p> <p>8 a politician -- and this has been mentioned -- takes</p> <p>9 a particular stance in relation to family life, that</p> <p>10 stance is made explicit, and then, unfortunately, the</p> <p>11 politician lapses from that in his or her private life.</p> <p>12 There may be not much dispute about that sort of case,</p> <p>13 but the identification of a public interest in exposing</p> <p>14 the mismatch, to put it in those terms, may be quite</p> <p>15 clear. Is that acceptable?</p> <p>16 A. Yes, I accept that.</p> <p>17 Q. Then on the other end -- and maybe we'll be seeing</p> <p>18 evidence bearing on this a bit later in the week -- we</p> <p>19 have successful people who have bent over backwards to</p> <p>20 protect their privacy, in particular the privacy of</p> <p>21 their children, where maybe it's very difficult to see</p> <p>22 a proper public interest in delving at all into their</p> <p>23 private life. Those quite straightforward cases.</p> <p>24 What about cases in the middle and perhaps some of</p> <p>25 the role model cases? Aren't those cases so inevitably</p> <p style="text-align: center;">Page 84</p>

<p>1 bound up with public expectations about how people 2 should behave -- maybe footballers in a certain position 3 in a national team or whatever, just to give you one 4 possible example -- that it's very difficult to be 5 dogmatic as to where the public interest lies. In the 6 end, it's a matter of opinion, isn't it? 7 A. I agree to a degree. 8 Q. Okay. 9 A. I think that there are distinctions between the 10 different classes or groups of those to whom you refer. 11 Like you, if I -- if one of our elected officials was 12 transgressing in a way that diminished the standing 13 which we should hold them in, then I would want to know 14 about it. If there was some event that was occurring 15 that related to the wellbeing of society, I would want 16 to know about it and I'm sure everyone else would want 17 to know about it, and therefore their rights to privacy 18 in those circumstances are clearly diminished. But you 19 can normally separate what is private information from 20 what is information that should be disseminated in the 21 public interest. 22 When you speak of role models, or when you speak of 23 those who play football, you know, there are different 24 categories there as well. There are those who have to 25 make their living from promoting their onscreen persona</p> <p style="text-align: center;">Page 85</p>	<p>1 category of being a crossover between professional 2 sports and general media profile. 3 So I don't accept it so far as the professional 4 footballers are concerned, unless one has a case, and 5 there are cases, that do stand out as obvious cases 6 where there may be public interest reasons why that 7 information should be disseminated, but the overwhelming 8 majority are private. 9 There's one further point I would like to put on 10 that. This mantra of journalists and lawyers who have 11 worked for the News of the World and other newspapers 12 constantly saying, "Oh, your client's a role model, 13 they're a role model, look, they have acted as 14 a hypocrite", and to hear of that from the senior 15 journalists who I knew extremely well at the 16 News of the World and the editors and the editors of the 17 various -- whether it be from news or features or sports 18 or whatever, and hearing this over and over again about 19 how my clients have been hypocrites because they'd had, 20 I don't know, an additional relationship or whatever, to 21 then learn of the activities of the News of the World, 22 whilst they had supposedly been seeking to identify the 23 hypocrisy of others, and yet they themselves, throughout 24 this period, were acting unlawfully, is the ultimate in 25 hypocrisy, in my view.</p> <p style="text-align: center;">Page 87</p>
<p>1 and therefore have to support that persona with 2 marketing activities such as actors or actresses who 3 appear in high -- large motion pictures. They have to 4 go through a process, but do we actually know the 5 person? No. We know their on-screen persona. We know 6 the persona which has evolved through our perception of 7 what they're about. 8 I believe that they are still entitled to a private 9 life, and the same goes for professional footballers. 10 It's hard to understand how the suggestion that all 11 professional footballers, or even those that play for 12 the national team, should be automatically considered to 13 be a role model to all who read the newspapers or all 14 who watch them play. The main reason why they've 15 achieved that success is because of their on-pitch or 16 on-field ability and excellence, largely as a result of 17 having decided from a very early age that they wanted to 18 be a professional sportsman. They haven't actually 19 decided that what they really want to be is 20 a professional sportsman who also appears in the 21 newspaper or in the media, because the vast majority of 22 our professional footballers earn very, very, very 23 little money from off-pitch activities. It's only an 24 absolute handful who have earned any significant sums, 25 and only one or two of them who could fall into the</p> <p style="text-align: center;">Page 86</p>	<p>1 Q. One can see the weakness of the tit-for-tat argument, 2 but that be said, the present England manager has 3 supported the view of the journalists in relation to the 4 England captain a couple of years ago. It took him, 5 I think, six minutes to sack the captain for failing to 6 be the role model he was supposed to be, so the 7 journalistic view is not necessarily out on a limb, is 8 it? 9 A. I'm never quite sure to the extent of which the 10 decision-making of an England manager is detached from 11 the marketing and PR people who operate it, but you're 12 absolutely right. There may be positions within public 13 life, such as the captain of a national team, where 14 standards of their private life are expected by those 15 who place them into those positions to be higher than 16 others. But fine, what are we talking about there? 17 We're talking about a relatively few people. Most 18 people can actually separate their public engagements, 19 actions and, if you like, activities, from those which 20 are private. 21 I mean, I have no -- other than my activities as 22 being a lawyer acting for people perhaps in the media or 23 for large companies, I have no public persona. I can 24 separate out my private life from what I do and act on 25 behalf of clients in relation to, and most people in</p> <p style="text-align: center;">Page 88</p>

<p>1 public life have been adept at actually separating out 2 those circumstances, especially when it comes to their 3 family circumstances and children and elderly parents, 4 et cetera. 5 Q. Well, Mr Shear, thank you for bearing with me. I've 6 given you a bit of a platform. You have taken up the 7 opportunity very eloquently, if I may say so. So it's 8 absolutely clear, others who will be in a position to 9 express a contrary view, will be given exactly the same 10 courtesy, but I am grateful to you for coming and I have 11 no further questions for you. 12 A. Thank you. 13 Questions from LORD JUSTICE LEVESON 14 LORD JUSTICE LEVESON: I have three topics which move it 15 back a little bit, and each arise from something you 16 said. 17 You spoke about the concern of your clients 18 following 2004 about the question of interception and 19 then finding about the Mulcaire notebook, and the 20 intrusiveness that you were experiencing through your 21 clients. 22 What I'd like to know is whether that has stayed the 23 same, got better or worse in the years since 2006, 2007, 24 2008, as we've learnt more and more about what's going 25 on. In other words, what I'm trying to pick up on is</p> <p style="text-align: center;">Page 89</p>	<p>1 So I think it accelerated and increased during the 2 period from about 2003 to about 2008 and 2009, and has 3 receded. Whether it's temporary because of the focus of 4 this Inquiry, only time will tell. 5 LORD JUSTICE LEVESON: So there's something potentially 6 positive come out of it anyway. 7 A. Out of your Inquiry? I'm sure that -- if I can morph 8 that into perhaps a further question, I think if all 9 that comes out of this is a more effective way to 10 facilitate a body that investigates and regulates and 11 trains our media so that it is an effective, if you 12 like, counterbalance to ensure an appropriate democratic 13 process, then, you know, if that's all that comes out of 14 it, that will be a very good thing, an extremely good 15 thing, because I think that some of the proportionality 16 and balance had not just eroded but become almost 17 ignored. I think that people lost their ethical compass 18 here, and it became systemic so that there was a real 19 weight and an incentive for people to push the 20 boundaries further and further, and that's why this sort 21 of feeling. I almost detected it as a kind of -- as 22 I mentioned before, this view that they were untouchable 23 and could do almost anything. 24 LORD JUSTICE LEVESON: All right. The second question is to 25 some extent linked. You were talking about the question</p> <p style="text-align: center;">Page 91</p>
<p>1 the question: "We've understood it", say the press, 2 "we've got the picture, and it's now very different". 3 A. You give a number of time periods there. 4 LORD JUSTICE LEVESON: Yes, and you can talk all the way 5 through them. 6 A. Sure. I actually think that the biggest separator has 7 occurred perhaps in the period from the summer of this 8 year onwards, and then before then from about the 9 mid-part of 2010. So I'm dealing with the time period 10 where there has been the greatest sensitivity and 11 probably the fewest stories and the least intrusion has 12 occurred whilst, I suppose, the microscope of this 13 Inquiry and the prospect of phone hacking claims are 14 most apparent and clear. 15 When one goes backwards in time, and I recall that 16 the periods from about 2003, 2004, and that goes back to 17 several cases where I was acting, to 2005 in relation to 18 some high-profile matters that I was involved in, 19 I think that there was an atmosphere not just of 20 complacency but also that they were almost untouchable 21 and therefore their activities became incredibly 22 intrusive and that there was a fever pitch of trying to 23 produce more and more and more detailed stories during 24 that period with a far lower recognition for either 25 consequences or private -- or personal private rights.</p> <p style="text-align: center;">Page 90</p>	<p>1 of prior notification and you told Mr Jay that there was 2 a time when you were in touch with newspapers almost 3 every week when there was prior notification of 4 potential stories, but that had decreased dramatically, 5 and you explained it because of the damages and the 6 balancing risk that you perceived the newspapers were 7 taking. 8 What I want to know is: have there been in this 9 period fewer stories? In other words, if the line of 10 stories had remained the same, then you would expect 11 increased involvement of you post-publication, whereas 12 previously you'd been able to dampen down the risk of 13 publication of stories. If, of course, there aren't 14 more stories, then that itself might reveal greater 15 responsibility or a greater decision-making being taken 16 by the press not to pursue particular lines. 17 Do you see the question? 18 A. I think I do. I think recently there have been fewer 19 stories which transgress. I think historically what 20 occurred was that, you know, the law of privacy evolved 21 gradually so that originally the reason why the press 22 were putting stories to us was to evaluate the risk of 23 defamation damages or damages arising from defamation 24 that occurred post-publication and they would assess 25 that risk pre-publication, and also to assess whether or</p> <p style="text-align: center;">Page 92</p>

<p>1 not they would effective have some resistance or no 2 resistance from publishing a story or to acquire 3 additional information. 4 What actually occurred was that as they put those 5 stories to us and the law or, if you like, the scope and 6 the way in which privacy arguments could be deployed 7 increased, there was a crossover, so that as they put 8 particular stories to us, we could identify whether or 9 not they were appropriate stories to contest publication 10 at all on the grounds that they stepped on the personal 11 or individual's rights to privacy. 12 But what also occurred at the same time was that 13 there was an increase in volume of stories being 14 generated or investigated, so that perhaps from, I don't 15 know, the late 1990s to the early part of 2000, there 16 would be maybe one sensationalist, titillating Sunday 17 story that was really a kiss-and-tell perhaps once every 18 three or four weeks. It accelerated and increased 19 dramatically during the sort of 2003, 2004 and onward 20 era. 21 So there's lots of different dynamics to what was 22 happening in the number of stories and the reasons why 23 they did or did not become published. 24 LORD JUSTICE LEVESON: There's a knock-on to that, of 25 course, that you may be acting for the celebrities and</p> <p style="text-align: center;">Page 93</p>	<p>1 years that deters people from taking on proceedings -- 2 or taking on the media organisations, because they feel 3 that they will -- it will be a war they will never win, 4 and that at some point that they will just have to give 5 up the process. 6 Some people are extremely focused about it and will 7 fight to protect their rights and fight to protect the 8 rights of their families and are very protective of 9 their family situation and will not stand for it, and 10 they're normally the ones that actually have continued 11 and pursued proceedings which have resulted in 12 substantial damages. 13 LORD JUSTICE LEVESON: Okay. The third and final area that 14 I wanted to ask you concerns an area which we're 15 certainly going to have to look at, but which nobody has 16 yet mentioned, which is the Internet. You made the 17 point that I think your footballer was concerned about 18 the jigsaw identification using material from the 19 Internet. Have you had to engage with those that are 20 responsible for putting material out on the Internet? 21 And if so, with what effect? Because that is, in part, 22 the elephant in the room. 23 A. I've had three cases which have involved the 24 dissemination of information via the Internet, either as 25 a result of, if you like, viral rumours or other means.</p> <p style="text-align: center;">Page 95</p>
<p>1 the famous who have the wherewithal firstly to instruct 2 you, or even to know about you, and second, to do 3 something about it if they want to. Do you have any 4 observations upon the risks to those who do not have the 5 wherewithal or the money or the knowledge to engage with 6 the press at this sort of level? 7 A. I think unless -- there's two parts to that, isn't 8 there? There's those people who have had stories 9 published about them where they feel that to contest 10 those stories and to commence proceedings is either 11 continuing the pain and therefore become deterred from 12 doing so, or don't have the financial capability to even 13 consider commencing proceedings. 14 I think that's a combination of, if you like, the 15 emotional consequences of having your private life or 16 defamatory statements published about you, coinciding 17 with your financial capabilities, and there are those 18 clients who do have the financial capability but become 19 deterred because they feel that they are confronting 20 organisations which are enormous and which have 21 extremely deep pockets. 22 As somebody once said to me, you know, why take on 23 a newspaper when actually they just order up another 24 barrel of ink and you're at risk in the future? And 25 that is something that I've heard regularly over the</p> <p style="text-align: center;">Page 94</p>	<p>1 They've all had different consequences and different 2 dynamics to them. 3 It's an extremely difficult problem to confront. 4 I remember the first case that I was involved in that 5 related to that is the Grosvenor House case that 6 I referred to a few moments ago. That case was the 7 subject of huge speculation and a lot of it was 8 undertaken by emails between people who were either 9 emailing websites or blogs or amongst people within 10 businesses, and there is -- it is extremely difficult to 11 prevent, if you like, identification or, I suppose, 12 focus by dissemination of information on the Internet. 13 On that case, we made it very clear to employers of 14 large organisations that they should not condone what 15 were defamatory emails by being passed within their 16 organisations and we did actually manage to prevent some 17 of the fall-outs by using that sort of technique. 18 Interestingly, in another case that I had, where it 19 was regarding the false identification -- or the 20 identification of the client, it's the pixelated or 21 silhouette image matter that I referred to, one of the 22 issues that the newspaper concerned raised was that, 23 irrespective of the fact that it had been identified on 24 the Internet who the person was in the image that was 25 silhouetted, that relatively few people became aware of</p> <p style="text-align: center;">Page 96</p>

<p>1 the identity of that person because it was being traded 2 on the Internet, it was on an Internet publication and 3 then it sort of morphed its way very gradually into the 4 mainstream media. On that occasion, I actually used the 5 Internet to undertake a poll to find out how many people 6 did manage to identify the person.</p> <p>7 So it cuts in both ways. You know, it is a tool 8 that can be used, but it is an extension of the media 9 which is very difficult to moderate. I have identified 10 situations in the past where I felt that it was going to 11 be counter-productive to attempt to restrict or to 12 change the agenda under discussion. It's almost like 13 the finger in the dyke; you can often create a bigger 14 consequences by contesting than you would by allowing it 15 to pervade.</p> <p>16 I've also noticed one other feature, which I think 17 is relatively sinister, and that's more recently where 18 I believe that sections of the media have instigated or 19 stimulated media -- Internet-led discussion and debate 20 and, I suppose, tittle-tattle, in order to bring into 21 the Internet culture information which then supports and 22 reduces the risks and damages which would be available 23 to the mainstream media if repeated within the 24 mainstream media. So I have seen an element where the 25 Internet is being used or utilised in a very, as I said,</p> <p style="text-align: center;">Page 97</p>	<p>1 material, quite wrongly, and it's quite difficult to get 2 that dealt with.</p> <p>3 LORD JUSTICE LEVESON: Thank you. Thank you very much 4 indeed.</p> <p>5 There's no applications you make under section 10, 6 Mr Sherborne?</p> <p>7 MER SHERBORNE: Sir, no, there isn't. Thank you very much, 8 though.</p> <p>9 LORD JUSTICE LEVESON: I think that's probably enough for 10 the morning, and we'll adjourn now and resume at 11 2 o'clock, if that's all right. Thank you. 12 (12.44 pm) 13 (The luncheon adjournment) 14 (2.00 pm)</p> <p>15 MR JAY: Sir, the next witness is Mr Hugh Grant, please. 16 MR HUGH JOHN MUNGO GRANT (affirmed) 17 Questions from by MR JAY</p> <p>18 MR JAY: Mr Grant, your full name, please? 19 A. Hugh John Mungo Grant.</p> <p>20 Q. Mr Grant, we've prepared a bundle for you and you'll 21 find, please, under tab 1, your first witness statement, 22 which is dated and signed by you with a statement of 23 truth on 3 November of this year. I invite you to take 24 that to hand, please, and confirm that that is your 25 first statement.</p> <p style="text-align: center;">Page 99</p>
<p>1 sinister fashion, in order to disseminate that.</p> <p>2 LORD JUSTICE LEVESON: Have you attempted to engage with any 3 of the Internet service providers?</p> <p>4 A. Yes, we have. Certainly with respect to Google and 5 Twitter, but that's more as a -- in situations where 6 they have been custodians of the information, the same 7 thing with, perhaps, Wikipedia as well, where 8 information has been brought into these media forums and 9 that we've engaged them and identified the assertions or 10 information generally that's being passed between people 11 and asked them to moderate it or remove it.</p> <p>12 There's a variety of responses that one receives. 13 Often it's very slow. I think they're concerned to 14 become too involved or too much of a participant.</p> <p>15 So far as Google is concerned, it's a difficult 16 situation to confront because they don't have any of 17 their servers in the UK, and therefore one is placed in 18 a position where one is seeking to persuade them of what 19 is appropriate as opposed to inappropriate conduct or 20 communication. They've become more responsive.</p> <p>21 I think Twitter is a difficult social media forum to 22 control or to moderate. People close their Twitter 23 accounts. I've had a number of clients whose names have 24 been utilised by others to open Twitter accounts and 25 then utilised to then disseminate defamatory or other</p> <p style="text-align: center;">Page 98</p>	<p>1 A. It is.</p> <p>2 Q. Then you gave a second statement, a supplementary 3 witness statement, on 11 November, and again made 4 a statement of truth.</p> <p>5 A. Yes.</p> <p>6 Q. What I'm going to do, Mr Grant --</p> <p>7 LORD JUSTICE LEVESON: Before you do anything --</p> <p>8 MR JAY: Yes.</p> <p>9 LORD JUSTICE LEVESON: Mr Grant, as with some of the other 10 witnesses, I'm very grateful to you for coming. I am 11 extremely conscious that you are speaking about matters 12 which you would prefer were not deployed in the press, 13 and that that is a difficult decision and a difficult 14 experience for you. I'm conscious of it and I'm 15 grateful to you for assisting the Inquiry with your 16 evidence.</p> <p>17 During the course of the afternoon, we're likely to 18 have a break, but if at any stage you feel that you want 19 just a few minutes off, you don't have to say "cut", 20 it's sufficient if you indicate it and I'll be 21 pleased --</p> <p>22 A. Thank you.</p> <p>23 LORD JUSTICE LEVESON: -- to accord you that time.</p> <p>24 A. Thank you very much.</p> <p>25 MR JAY: We're not time limited, Mr Grant. We have the</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 whole afternoon.</p> <p>2 A. I'm sorry to hear that.</p> <p>3 Q. Your evidence subdivides, if I may say so, into evidence</p> <p>4 of fact and evidence of opinion. I'd like to start,</p> <p>5 please, with the evidence of fact, do you follow me,</p> <p>6 before we move on to the opinions.</p> <p>7 A. Yes.</p> <p>8 Q. In relation to your career, everybody, of course,</p> <p>9 probably knows all about your career, but you made it</p> <p>10 big, if I can so describe it, with a film in 1994, "Four</p> <p>11 Weddings and a Funeral", but although you don't say so</p> <p>12 yourself, you did rather well, I think, with another</p> <p>13 film which some of us enjoyed in 1987 called "Maurice",</p> <p>14 so it wasn't as if it's a one-off. You career then took</p> <p>15 off thereafter.</p> <p>16 You say in your statement that following the success</p> <p>17 of "Four Weddings and a Funeral" in 1994, initially the</p> <p>18 press comment was favourable and then it plummeted. Can</p> <p>19 you tell us a bit about the favourable part, the good</p> <p>20 part, if we can so describe it, in your own words,</p> <p>21 please?</p> <p>22 A. Well, it was fairly brief, but of course on the back of</p> <p>23 that success of "Four Weddings and a Funeral", yes,</p> <p>24 there was a spirit of goodwill. I think the nation</p> <p>25 liked having a film that was making -- that was popular</p> <p style="text-align: center;">Page 101</p>	<p>1 abuses of some sections of the British press is</p> <p>2 emphatically not motivated by the treatment I got when</p> <p>3 I was arrested in 1995. I say in my statement here</p> <p>4 I was arrested, it was on public record, I totally</p> <p>5 expected there to be tons of press, a press storm. That</p> <p>6 happened, and I have no quarrel with it, none</p> <p>7 whatsoever. I just thought it's important to make that</p> <p>8 point.</p> <p>9 Q. Fair enough.</p> <p>10 There was an incident involving a break-in to your</p> <p>11 London flat on the fourth floor?</p> <p>12 A. Yes.</p> <p>13 Q. The front door was forced off its hinges. It sounds as</p> <p>14 if it was professionally done. There was no damage</p> <p>15 inside the flat; is that correct?</p> <p>16 A. No damage and nothing was stolen.</p> <p>17 Q. Yes.</p> <p>18 A. This came at the zenith of the sort of press storm</p> <p>19 around that arrest in Los Angeles. I was now back in</p> <p>20 London, holed up in my flat, and I'd managed to get out</p> <p>21 for the day, or the night -- I can't remember. Anyway,</p> <p>22 when I came back, this flat had been broken into. The</p> <p>23 front door had been basically just shoved off its</p> <p>24 hinges. As I say, nothing was stolen, which was weird,</p> <p>25 and the police nevertheless came around the next day to</p> <p style="text-align: center;">Page 103</p>
<p>1 and funny and doing very well all over the world. You</p> <p>2 know, we enjoy the few British cinema successes we get</p> <p>3 and I got a little blip of positive press on the back of</p> <p>4 that, yes.</p> <p>5 Q. At that stage, was there any interest in your private</p> <p>6 life, do you think?</p> <p>7 A. There was a great deal of interest suddenly in my</p> <p>8 private life.</p> <p>9 Q. Yes?</p> <p>10 A. Particularly beginning at the premiere of that film,</p> <p>11 when the press became very interested in me and my</p> <p>12 girlfriend.</p> <p>13 Q. Yes. Okay, I think we probably remember that premiere.</p> <p>14 A. Yes.</p> <p>15 Q. Can I move on to perhaps the darker side. This is</p> <p>16 paragraph 7 of your witness statement.</p> <p>17 A. Yes.</p> <p>18 Q. I'm not going to cover the events of July 1995. We're</p> <p>19 not interested in that.</p> <p>20 A. I wish you would, in a way, simply because -- am</p> <p>21 I allowed to break in on you?</p> <p>22 Q. Of course, yes.</p> <p>23 A. Just because I think it's an important point that I make</p> <p>24 in this statement, that all the questioning and</p> <p>25 campaigning I've done recently about what I see as the</p> <p style="text-align: center;">Page 102</p>	<p>1 talk about it, and the day after that a detailed account</p> <p>2 of what the interior of my flat looked like appeared in</p> <p>3 one of the British tabloid papers. I can't remember</p> <p>4 which one at the moment, but it was definitely there,</p> <p>5 and I remember thinking: who told them that? Was that</p> <p>6 the burglar or was that the police? And when I told</p> <p>7 this story to Tom Watson recently, the MP who was</p> <p>8 writing a book about this kind of thing, he nodded</p> <p>9 knowingly, saying, "Oh yes, that particular method of</p> <p>10 break-in I've come across with several other people who</p> <p>11 are victims of a lot of -- in the crosshairs of a lot of</p> <p>12 the press attention, and it doesn't seem to have been</p> <p>13 a singular occasion."</p> <p>14 And you know, it seemed doubly sinister to me</p> <p>15 because that flat, as you said, is -- you have to walk</p> <p>16 up a hell of a lot of stairs to get there. I think it</p> <p>17 was a very bad choice for a normal burglar, and nothing</p> <p>18 was stolen, and I've had it for 25 years and it's never</p> <p>19 been broken into before or since.</p> <p>20 Q. In terms of the logical possibilities, I suppose it's</p> <p>21 either, in no particular order, a leak from the police</p> <p>22 or it might be the burglar was acting on the</p> <p>23 instructions of the press to gain sight of the inside of</p> <p>24 your flat. We don't know which hypothesis is the</p> <p>25 correct one.</p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

<p>1 A. Well, or both. 2 Q. Or both. 3 A. I think the most likely scenario is both. 4 LORD JUSTICE LEVESON: Or, alternatively, a burglar who has 5 found whose flat he's burgled and decided there's some 6 way he can make some money. Whatever. I'm not -- 7 A. Fine. Fine. But they were very -- you know, this was 8 at a time when there was a lot of press outside all the 9 time, desperate to get in. It was the middle of the 10 summer and I know they were listening. You know, it was 11 right up, four floors up and they could actually hear 12 one or two of the rows I was having at the time, so 13 I know they were desperate to get some kind of access. 14 MR JAY: At paragraph 8 and following you deal with various 15 libel actions, all of which were successful. Can you 16 assist us, please, with a general idea of how many libel 17 claims we're talking about? 18 A. I don't know. It's been 16, 17 years since "Four 19 Weddings", since I became of any kind of interest to the 20 tabloid press, and I would imagine that in those 17 21 years that, I don't know, half a dozen, maybe more, 22 maybe 10. I've got -- my lawyer's over there. You 23 could ask him. He'd know. 24 Q. Yes. 25 A. I just mention two here out of those because it would be</p> <p style="text-align: center;">Page 105</p>	<p>1 a production company which is associated with Warner 2 Brothers and whose assistant is a charming married 3 middle-aged lady, English, who, as happens in Hollywood, 4 is the person who rings you. The executive never rings 5 you. It's always their assistant: "Hi, we have Jack 6 Bealy(?) on the phone for you." And this is what she 7 used to do. She used to call and she used to leave 8 messages and because she was a nice English girl in LA, 9 sometimes when we spoke, we'd have a chat about English 10 stuff, Marmite or whatever. 11 So she would leave charming, jokey messages saying, 12 "Please call this studio executive back", and she has 13 a voice that could only be described as plummy. So 14 I cannot for the life of me think of any conceivable 15 source for this story in the Mail on Sunday except those 16 voice messages on my mobile telephone. 17 Q. You haven't alleged that before, have you, in the public 18 domain? 19 A. No, but when I was preparing this statement and going 20 through all my old trials and tribulations with the 21 press, I looked at that one again and thought that is 22 weird, and then the penny dropped. 23 Q. I think the highest it can be put is, frankly, it's 24 a piece of speculation on your part, isn't it, in 25 relation to this?</p> <p style="text-align: center;">Page 107</p>
<p>1 very boring to go through them all, and in themselves 2 they're not significant, but these two particular 3 examples I think are significant. 4 Q. Yes. The example you give in paragraph 11, February 5 2007 -- 6 A. Yeah. 7 Q. -- the plummy-voiced woman issue. 8 A. Mm. 9 Q. Are you suggesting there that the story must have come 10 from phone hacking? 11 A. Well, what I say in this paragraph is that the Mail on 12 Sunday ran an article in February 2007 saying that my 13 relationship with my then girlfriend, Jemima Khan, was 14 on the rocks because of my persistent late-night 15 flirtatious phonecalls with a plummy-voiced studio 16 executive from Warner Brothers, and it was a bizarre 17 story, completely untrue, that I sued for libel over and 18 won and damages were awarded, a statement was made in 19 open court. 20 But thinking about how they could possibly come up 21 with such a bizarre left-field story, I realised that 22 although there was no plummy-voiced studio executive 23 from Warner Brothers with whom I'd had any kind of 24 relationship, flirtatious or otherwise, there was 25 a great friend of mine in Los Angeles who runs</p> <p style="text-align: center;">Page 106</p>	<p>1 A. Yes, you could -- yes, speculation, okay, but I would 2 love to know -- I mean, I think Mr Caplan, who 3 represents Associated, was saying earlier today that 4 he'd like to put in a supplementary statement and -- you 5 know, referring to the things I say today. Well, I'd 6 love to hear what the Daily Mail's or the Sunday Mail's 7 explanation for that article is, what that source was, 8 if it wasn't phone hacking. 9 Q. Okay. I may come back to that, but I'll leave that for 10 the time being. 11 The next article you refer to is in paragraph 12 of 12 your statement, which is one in the Sunday Express. The 13 point about this article -- and we have it in HG1 on the 14 internal numbering at page 3 but on the numbering at the 15 bottom right-hand side, a number ending 1921 -- is that 16 this article was entirely untrue. 17 A. Yes, it's an article that purported to be written by me 18 and which I hadn't written. Nor had I done that thing 19 that, you know, happens a lot in papers, where it's 20 someone talking to someone. I had not even spoken to 21 a journalist. It was completely, as far as I could see, 22 either made up or patched and pasted from previous 23 quotations I might have given in interview. 24 Q. Right. 25 A. That is why, as I recall, the Express lost their case</p> <p style="text-align: center;">Page 108</p>

<p>1 and had to apologise.</p> <p>2 Q. This statement in open court makes precisely that point,</p> <p>3 that you did not contribute to the article in any way</p> <p>4 and the Express admitted that.</p> <p>5 A. Mm.</p> <p>6 Q. Those are the two examples of defamation claims. You</p> <p>7 also provide examples of privacy claims.</p> <p>8 A. Mm.</p> <p>9 Q. The first one of these over which there was litigation</p> <p>10 was paragraph 13 of your witness statement, a visit to</p> <p>11 Charing Cross Hospital.</p> <p>12 A. Yes.</p> <p>13 Q. Details of which it's probably unnecessary to go into,</p> <p>14 but it did culminate in a claim against the Mirror for</p> <p>15 breach of confidence and you got judgment from</p> <p>16 Mr Justice Wright; that's correct, isn't it?</p> <p>17 A. Yes.</p> <p>18 Q. You also complained to the PCC and that claim was</p> <p>19 upheld, was it not?</p> <p>20 A. Yes, finally, after a lot of effort. I mean, it took</p> <p>21 months and months. They were very reluctant to do</p> <p>22 anything. Finally, I got a tiny recognition that my</p> <p>23 complaint had been upheld deep in the newspaper.</p> <p>24 Q. Right.</p> <p>25 A. Without referring to what the complaint was about.</p> <p style="text-align: center;">Page 109</p>	<p>1 medical records being appropriated and printed for</p> <p>2 commercial profit could not come under the remit of the</p> <p>3 PCC. If that doesn't come under the remit of the PCC,</p> <p>4 what the hell is the PCC for?</p> <p>5 Q. I think they were saying it did.</p> <p>6 A. Yes, but why did it take them so long?</p> <p>7 Q. It was other matters they were saying -- they don't</p> <p>8 identify what those matters were -- that may be outside</p> <p>9 of the remit, but your essential complaint -- you can</p> <p>10 see that in the first paragraph of the adjudication,</p> <p>11 confidential medical information about you was</p> <p>12 published -- that's the complaint they eventually</p> <p>13 focused on and they upheld it. Do you follow?</p> <p>14 LORD JUSTICE LEVESON: We don't know from this document the</p> <p>15 date of this adjudication. Everybody agrees -- well,</p> <p>16 you've said, but we can't agree it, that it took a long</p> <p>17 time but do you know the date? Do you remember</p> <p>18 approximately how long it took? The date isn't on it.</p> <p>19 A. My recollection is that it's about three months, but --</p> <p>20 LORD JUSTICE LEVESON: Doubtless somebody will be able to</p> <p>21 tell us at some stage.</p> <p>22 A. Yes.</p> <p>23 LORD JUSTICE LEVESON: Don't worry about it.</p> <p>24 MR JAY: There's another similar complaint, or rather issue,</p> <p>25 and you touched on this in paragraph 15 of your</p> <p style="text-align: center;">Page 111</p>
<p>1 Q. Could I take that in stages? The PCC adjudication you</p> <p>2 will have in the bundle we have prepared for you, under</p> <p>3 tab 4.</p> <p>4 A. Yes. This will take me hours.</p> <p>5 Q. It won't.</p> <p>6 A. Tab 4. Okay, I see, all right. Yes.</p> <p>7 Q. They upheld the privacy complaint but they noted, you'll</p> <p>8 see in the second paragraph:</p> <p>9 "The complainant also raised a number of issues</p> <p>10 arising from the complaint, involving confidentiality</p> <p>11 and sources of information which were outside the</p> <p>12 Commission's remit."</p> <p>13 And then at the bottom:</p> <p>14 "The Commission regretted the delay."</p> <p>15 That was to do with resolving issues of</p> <p>16 jurisdiction. So rightly or wrongly -- I don't think</p> <p>17 it's going to be possible for us to go into this --</p> <p>18 there were questions raised as to whether your complaint</p> <p>19 fell within the remit of the PCC and it took them time</p> <p>20 to resolve those questions. Once they resolved the</p> <p>21 questions, they upheld that part of the complaint which</p> <p>22 they felt they could deal with. Do you understand that?</p> <p>23 A. I understand that that's what they wrote.</p> <p>24 Q. Yes.</p> <p>25 A. But I fail entirely to understand how an individual's</p> <p style="text-align: center;">Page 110</p>	<p>1 statement. It's much more recent. It involves a visit</p> <p>2 to the Chelsea and Westminster Hospital in March of this</p> <p>3 year.</p> <p>4 A. Yes.</p> <p>5 Q. First of all, Mr Grant, are you happy that we talk about</p> <p>6 that?</p> <p>7 A. Yes, otherwise I wouldn't have put it in the statement.</p> <p>8 Q. Fair enough. The article itself is under HG1. The</p> <p>9 internal numbering is page 14. It's a longer number at</p> <p>10 the bottom right-hand side of the page. It's the number</p> <p>11 ending 1932. HG1 is tab 2, Mr Grant.</p> <p>12 A. Thank you. 1932.</p> <p>13 Q. Yes.</p> <p>14 LORD JUSTICE LEVESON: There's a 14 just above it.</p> <p>15 A. Okay. Yes, I have it.</p> <p>16 MR JAY: I'm going to ask you to comment about this. The</p> <p>17 details probably don't matter. You ended up in the</p> <p>18 Accident & Emergency department of this hospital. What</p> <p>19 the article is saying, or may be trying to say, is that</p> <p>20 here was a famous man, he didn't pull rank, he waited</p> <p>21 his turn in the queue. We all know from these A&E</p> <p>22 departments that you sometimes have to wait a long time,</p> <p>23 particularly if it's not serious. You made no</p> <p>24 complaint. This all reflects rather well on you. Do</p> <p>25 you follow that? That's what they were trying to get</p> <p style="text-align: center;">Page 112</p>

<p>1 at.</p> <p>2 A. Yes, but that's not my interpretation of the story.</p> <p>3 Q. Okay.</p> <p>4 A. The classic tabloid technique to cover a really</p> <p>5 egregious breach of someone's privacy is to wrap it up</p> <p>6 in a nice story. So if they photograph someone's baby,</p> <p>7 they'll say, "Oh, what a pretty baby" to try and stop</p> <p>8 the parents suing them for breach of privacy.</p> <p>9 This is exactly the same. This is an article which</p> <p>10 says not only that I went to hospital for but what</p> <p>11 I went for. It's my medical record. It's the exact</p> <p>12 complaint, that I was dizzy and short of breath, which</p> <p>13 to me is a gross intrusion in my privacy and they have</p> <p>14 deliberately dressed that up as a flattering article</p> <p>15 about how undiva-ish I was to try and get away with</p> <p>16 that.</p> <p>17 Q. I'll come back to further comment on it, but it ended up</p> <p>18 with The Sun either paying damages or paying to</p> <p>19 a charity; is that right?</p> <p>20 A. Yeah. It wasn't just the Sun who ran that piece. The</p> <p>21 Express ran a piece similar, as I recall, and as I say</p> <p>22 in my statement, by that stage of my life -- this was</p> <p>23 only this year, wasn't it? I think it was this year.</p> <p>24 I was weary and, to a certain degree, wary of endless</p> <p>25 lawsuits against tabloids. They take a long time,</p> <p style="text-align: center;">Page 113</p>	<p>1 the story apparently came from a picture agency who had</p> <p>2 been tipped off by a non-medical employee at the</p> <p>3 hospital. Could that be true?</p> <p>4 A. Well, there was no picture, so that bit's a little</p> <p>5 weird.</p> <p>6 Q. Right.</p> <p>7 A. But for them to know my medical -- the details of why</p> <p>8 I went there, it must have been someone with access to</p> <p>9 the computer where you register. I hope and I'm sure it</p> <p>10 was none of the medical staff, who I have to say were</p> <p>11 fantastic in that hospital, as they always are, but</p> <p>12 I suspect that it was the age-old system of someone at</p> <p>13 the hospital being on a retainer from either a tabloid</p> <p>14 newspaper or perhaps a picture agency. You know: "If</p> <p>15 anyone famous comes in, tell us and here's 50 quid or</p> <p>16 500 quid", or whatever it is I am quite sure -- well, my</p> <p>17 opinion is that that was the source, as it had been back</p> <p>18 in June 1996, and as it was again recently in the case</p> <p>19 of my baby.</p> <p>20 Q. In paragraphs 16 and 17 of your statement, you deal with</p> <p>21 other intrusions on your privacy, which I think we'll</p> <p>22 just, if you don't mind, take as read. I would like to</p> <p>23 move on to paragraph 18 and the section about paparazzi.</p> <p>24 You give one example at the bottom of paragraph 18</p> <p>25 about being chased at high speed. Your girlfriend was.</p> <p style="text-align: center;">Page 115</p>
<p>1 there's a lot of stress. So I tried to shortcircuit it</p> <p>2 by offering them: "Look, there'll be no lawsuit if you</p> <p>3 just each pay £5,000 to a charity which I support called</p> <p>4 Healthtalkonline", and seeing as they had both talked</p> <p>5 about my health online, I thought that was elegant. The</p> <p>6 Express flatly refused to pay a penny, and after much</p> <p>7 protesting, the Sun gave the charity £1,500.</p> <p>8 Q. Is this your point, Mr Grant, that it doesn't matter</p> <p>9 whether the underlying story is true; the point is it's</p> <p>10 an invasion of your privacy and there is not a public</p> <p>11 interest in people putting out articles about your</p> <p>12 health? Is that your point in a nutshell?</p> <p>13 A. I think no one would expect -- no British citizen would</p> <p>14 expect their medical records to be made public or to be</p> <p>15 appropriated by newspapers for commercial profit.</p> <p>16 I think that's fundamental to our British sense of</p> <p>17 decency.</p> <p>18 Q. No. To be fair to the Sun, we don't know the source of</p> <p>19 the story from the article itself.</p> <p>20 A. No, maybe it was just a lucky guess.</p> <p>21 LORD JUSTICE LEVESON: I don't think they're probably</p> <p>22 suggesting that, but it could be a number of different</p> <p>23 cases.</p> <p>24 A. What would they be, sir?</p> <p>25 MR JAY: There could well be evidence about this later, but</p> <p style="text-align: center;">Page 114</p>	<p>1 Could you tell us a little bit more about that?</p> <p>2 A. That was a relatively common occurrence with two of the</p> <p>3 girlfriends I've had. They both have children and in</p> <p>4 both cases -- actually, that's not quite fair. The</p> <p>5 first girlfriend, when she was with me, we didn't have</p> <p>6 children, so that doesn't apply, but the second</p> <p>7 girlfriend -- although that first girlfriend has</p> <p>8 subsequently had children and been very badly chased and</p> <p>9 abused, but the second girlfriend, she did have children</p> <p>10 and she was frequently, especially in the early days of</p> <p>11 our romance, followed and chased, even when she had her</p> <p>12 children in the car and even when the children were not</p> <p>13 enjoying it, crying. They pulled up for petrol, they'd</p> <p>14 ask the paparazzi who pulled in and started taking</p> <p>15 pictures: "Please go away, there's children in this car</p> <p>16 and they're frightened", and these paparazzi would</p> <p>17 continue to take pictures and then they'd be bought by</p> <p>18 one of the national newspapers.</p> <p>19 Q. The paparazzi presumably were working freelance?</p> <p>20 A. Yes. As I explain in this statement, there are two</p> <p>21 kinds of press photographers. There are either ones who</p> <p>22 are on staff for the papers. They just occasionally</p> <p>23 show a modicum of decency, although they didn't in the</p> <p>24 case of, recently, my baby. They staked out a new</p> <p>25 mother for three days. She couldn't really leave her</p> <p style="text-align: center;">Page 116</p>

<p>1 home.</p> <p>2 And then there are the much worse freelance</p> <p>3 paparazzi who are increasingly -- well, the police tell</p> <p>4 me they are increasingly recruited from criminal classes</p> <p>5 and very often they have criminal records, they have</p> <p>6 been in different fields of crime previous to being</p> <p>7 paparazzi and who will really stop the nothing, who show</p> <p>8 no mercy, no ethics, because the bounty on some of these</p> <p>9 pictures is very high, and I suspect that the ones who,</p> <p>10 for instance, were chasing my girlfriend and her</p> <p>11 children, were those freelance types. I suspect they</p> <p>12 were the ones who try to -- who always try to take</p> <p>13 pictures up girls' skirts and then digitally remove</p> <p>14 their underwear because they can sell the picture for</p> <p>15 a little more if they do that. I suspect they are the</p> <p>16 ones who were following Princess Diana when she died and</p> <p>17 whom the tabloid papers, particularly the Daily Mail,</p> <p>18 promised they would never buy pictures from again but</p> <p>19 which they subsequently did, about three months later.</p> <p>20 LORD JUSTICE LEVESON: Not now, but I'd like to come back to</p> <p>21 the mechanisms whereby any of that can be controlled,</p> <p>22 just for your view on it. Not now. Mr Jay will come to</p> <p>23 it.</p> <p>24 A. Sure.</p> <p>25 MR JAY: If we move on to the issue of hacking, Mr Grant,</p> <p style="text-align: center;">Page 117</p>	<p>1 A. To be honest with you, I've always been confused about</p> <p>2 that. He was not wearing a uniform, but for some reason</p> <p>3 I've always told the story as a policeman, and maybe he</p> <p>4 had a rank or something. I wish I could tell you</p> <p>5 accurately and I can't find -- I've looked everywhere</p> <p>6 for the details of the meeting. I mean, it definitely</p> <p>7 happened. I didn't make it up. He came to my house, he</p> <p>8 sat in my kitchen and he told me that they had arrested</p> <p>9 a private detective, a private investigator, who --</p> <p>10 whose notebook contained intimate personal details on</p> <p>11 a number of people and I was one of them. And that it</p> <p>12 contained my address, the address of my -- some close</p> <p>13 friends, relations. I remember him saying phone</p> <p>14 numbers, although I know you're about to contest that,</p> <p>15 but I can't imagine they'd come to tell me they had my</p> <p>16 address because everyone had my address. I said, "Who's</p> <p>17 this person working for?" And he said, "Well, it looks</p> <p>18 from his notebook like he's working for most of the</p> <p>19 British press."</p> <p>20 Q. Yes, which might suggest it was the</p> <p>21 Information Commissioner's office rather than</p> <p>22 Mr Mulcaire, but --</p> <p>23 A. I'm sure it was. I'm sure it wasn't Mulcaire --</p> <p>24 LORD JUSTICE LEVESON: I think you'll find the</p> <p>25 Information Commissioner employs ex-police officers.</p> <p style="text-align: center;">Page 119</p>
<p>1 which you cover in some detail.</p> <p>2 To set the scene, you tell us in paragraph 24 that</p> <p>3 warnings started to come through from media lawyers</p> <p>4 about how to protect privacy, and amongst the advice</p> <p>5 they gave was that phone numbers should be changed</p> <p>6 frequently and voicemails set on PINs other than</p> <p>7 defaults. Can you remember when those warnings started</p> <p>8 to emanate?</p> <p>9 A. I can't exactly, but I mean I'm guessing it was early</p> <p>10 2000s, you know? Sort of 2000 to 2005, that kind of</p> <p>11 time.</p> <p>12 Q. Right. Were you the direct recipient of such warnings?</p> <p>13 A. I had circular emails that were sent from Schillings,</p> <p>14 the media lawyers, to lots of clients and to ex-clients.</p> <p>15 I think I might have been an ex-client of Schillings by</p> <p>16 then -- I can't remember -- and I remember looking at</p> <p>17 this list. It was just a warning, saying, "These are</p> <p>18 some of the things they're up to. Be careful of</p> <p>19 Bluetooth, be careful of your PIN numbers, be careful of</p> <p>20 your phones", and so on. "Get your car swept."</p> <p>21 Q. Then, paragraph 25, you say it was about 2004 when</p> <p>22 someone came from the Information Commissioner's office?</p> <p>23 A. Yes, out of the blue.</p> <p>24 Q. Can you remember whether it was a policeman who came or</p> <p>25 was it an official from the Information Commissioner?</p> <p style="text-align: center;">Page 118</p>	<p>1 MR JAY: Yes.</p> <p>2 A. Yes, we know that because there was the story recently</p> <p>3 in the Independent about one of those police officers</p> <p>4 who was shocked that at the end of this particular</p> <p>5 inquiry, they weren't allowed to interview any of the</p> <p>6 journalists who had hired the private detective in the</p> <p>7 first place.</p> <p>8 MR JAY: You're in danger of foreshadowing evidence we'll be</p> <p>9 hearing next week from the relevant person, but what</p> <p>10 I need to put to you, Mr Grant, is that it's clearly the</p> <p>11 Information Commissioner's office's position that they</p> <p>12 never discovered any evidence relating to phone hacking.</p> <p>13 So if that's right, it would suggest that your</p> <p>14 recollection must be incorrect and you must be confusing</p> <p>15 this with the Mulcaire notebooks and not the Wittamore</p> <p>16 notebooks.</p> <p>17 A. I know that this wasn't the Mulcaire case that came to</p> <p>18 me. As I said to you before, I cannot understand why</p> <p>19 they would come and tell me that a man had my address,</p> <p>20 because everyone had my address. The paps were out</p> <p>21 there, you know, all the time.</p> <p>22 Q. Yes.</p> <p>23 A. So if he didn't also have my phone numbers at the very</p> <p>24 least -- and I think he said PIN numbers as well -- then</p> <p>25 I don't understand why he'd come to see me.</p> <p style="text-align: center;">Page 120</p>

<p>1 Q. Can I just break that down? Having your address, 2 although it may not be that difficult a piece of data to 3 obtain, could be attained in breach of the Data 4 Protection Act. Do you follow me? 5 A. Yeah, yeah. 6 Q. And it may be that you are associating what could have 7 been a reasonably limited if not unremarkable discussion 8 which was limited to breaches of the Data Protection Act 9 and then extrapolating from that and bringing in more 10 sinister details about PIN numbers and possible evidence 11 of voicemail hacking. Do you see that? 12 A. We're obviously not going to agree on this so we'll have 13 to leave it. We'll have to park that issue. Certainly 14 they were telling me about blagging and that kind of 15 thing, certainly. 16 Q. Was that the phrase they used? 17 A. I can't remember. It was 2004. But it was -- 18 LORD JUSTICE LEVESON: I don't think you ought to assume 19 that Mr Jay is agreeing or disagreeing. The fact it 20 that as I'm sure you appreciate, it's very important 21 that those others who are going to give evidence -- some 22 of them have seen parts of what you've said in order to 23 comment. 24 A. Yes. 25 LORD JUSTICE LEVESON: And part of the system is that you</p> <p style="text-align: center;">Page 121</p>	<p>1 I going to do? I'm late for my appointment." And there 2 was no taxis around, it was Christmassy, it was icy, and 3 then amazingly a car -- van pulled up in the other 4 carriageway of this dual carriageway, and I thought: 5 "Good, some nice Kent-ish person has come to help", and 6 instead out stepped a man with a great long lens. 7 I thought: "I can't believe in the middle of Kent, in 8 the middle of winter, there's a pap." And he came over 9 and he took lots of pictures. I wasn't entirely polite 10 to him. Then to my horror I realised there was no other 11 way of getting to this appointment. He kept saying, "Do 12 you want a lift?" and I thought: "I know this is in your 13 interests that I take the lift", so I kept saying no. 14 Finally I did, so then I was suddenly in the car with 15 this man with my friend, and that is when he revealed 16 that he was an ex-News of the World features editor who 17 is now retired and running a pub down in Dover and he 18 kept his camera in his glove box of his car just in case 19 of some happy accident, which he'd just encountered. 20 Then he went on to tell me all these fascinating 21 things -- boasting, really -- about how extensive phone 22 hacking had been at the News of the World, how 23 Andy Coulson had known about it for sure, how they had 24 enjoyed the competitive sycophancy of five successive 25 governments, of the way they paid off the police for</p> <p style="text-align: center;">Page 123</p>
<p>1 are asked about their concerns so they can respond. 2 A. Yes. 3 LORD JUSTICE LEVESON: But you will shouldn't assume that 4 because Mr Jay is asking the question, he necessarily is 5 agreeing with or disagreeing with the proposition he's 6 putting to you. 7 A. I understand. 8 MR JAY: Was Mr Wittamore's name mentioned by the gentleman, 9 ex-policeman or otherwise, from the 10 Information Commissioner's office? 11 A. I don't think so. But seeing as that whole Inquiry was 12 about the Wittamore arrest, it's difficult to imagine 13 that it was about anyone else. 14 Q. Yes, you learned that subsequently, didn't you? 15 A. Yes. 16 Q. The next event was a chance encounter with a Mr Paul 17 McMullan, Mr Grant, and you deal with that in 18 paragraph 26 of your witness statement. 19 A. Yes. 20 Q. Tell us about the chance encounter. We've read about 21 it, but you ended up in the same car as him, didn't you? 22 A. Yes. I broke down -- 23 Q. Yes. 24 A. -- in my car in Kent, in the remotest countryside just 25 before Christmas last year, and thought: "What am</p> <p style="text-align: center;">Page 122</p>	<p>1 years, and I was thinking: "This is all amazing stuff. 2 I wish I had a tape recorder." 3 Then he dropped -- 4 Q. So to cut a long story short, the next time you saw him, 5 you did have a tape recorder. That's right, isn't it? 6 A. Yes, that is right, yes. 7 Q. And indeed, there was a piece about it in the 8 New Statesman, which again is in our bundle, HG1. On 9 the internal numbering it's page 15, but on the longer 10 number it ends 1933. 11 A. Yeah. 12 Q. Quite a zippy title. 13 A. Thank you. 14 Q. Is this, Mr Grant, a verbatim transcript of the tape 15 recording? 16 A. Yes. There are boring bits left out. I put in just all 17 the juicy bits. 18 Q. We've all read it and I'm not going to go over all of 19 it, you understand, but I have been asked to go over in 20 particular -- and I was in any event intending to do 21 so -- the very bottom of the first page. 22 A. Yes. 23 Q. You're chipping in. It reads at the moment: 24 "And ... it wasn't just the News of the World; it 25 was ..."</p> <p style="text-align: center;">Page 124</p>

<p>1 And then it continues. First of all, can you 2 remember what goes in the "..."? 3 A. No. That would be one of the boring bits. But I mean, 4 it's nothing sinister. Or it could be that the jukebox 5 was too loud at that point. The tape recording is quite 6 hard to hear, and I was only able to transcribe it, you 7 know, having just had the meeting. 8 Q. Yes. I suppose if necessary, we're not going to do it 9 now, but we could listen to it, if you agreed? 10 A. Well -- 11 Q. Do you have a problem with that? 12 A. I do have a problem with that. I feel like I did my 13 revenge number on Paul McMullen, and I -- for me, that's 14 the issue closed with him, and when I've had now two 15 separate police inquiries, the one into police 16 corruption and the other one into phone hacking, they 17 have come to me and they have asked for the tape and 18 I've refused because that seems to me too harsh. 19 I don't want to be sending Paul McMullen to prison. In 20 addition to which, he has to be given some credit for 21 having been a whistleblower on all this stuff. 22 Q. Okay. We note that answer, but I have to continue with 23 your question. 24 A. Yes. 25 Q. "... it wasn't just the News of the World; it was, you Page 125</p>	<p>1 Did you see that story? The picture of you breaking 2 down. I ought to thank you for that. I got £3000." 3 He's talking there about selling a photograph of 4 you, isn't he? 5 A. Well, he segues into that, but I didn't leave anything 6 out and, you know, if it helps, you can come around to 7 my house and listen to the tape. I left nothing out 8 between "... it wasn't just News of the World; it was 9 you know, the Mail" and him answering: 10 "Oh, absolutely, yeah. When I went freelance in 11 2004, the biggest payers -- you'd have thought it was 12 the News of the World but actually, it was the 13 Daily Mail." 14 That is the sequence of the conversation. There's 15 nothing left out. 16 Q. So what you're asking us to do then is to read carefully 17 what he says and interpret his answer, and certainly one 18 highly reasonable interpretation of his answer is that 19 he's limiting his comment, his evidence, if you like, to 20 the selling of photographs, isn't he? 21 A. As I said before, he segues in that answer straight on 22 to photographs. He goes: 23 "If I take a good picture, the first person I go to 24 is ..." 25 So I agree that it's strange syntax, it's a segue, Page 127</p>
<p>1 know, the -- the Mail?" 2 It was very much a leading question, Mr Grant, 3 wasn't it? 4 A. Yes. 5 Q. There was no evidence -- 6 A. But I'm not a lawyer. I'm allowed to ask leading 7 questions. 8 Q. Fair enough. But there's no evidence that you have to 9 your personal knowledge that the Mail was involved in 10 this at all, is there? 11 A. Um ... 12 Q. I'm asking you to be very careful when you answer the 13 question. Don't share a speculation with us. Don't 14 share an opinion. We're looking for evidence. There 15 isn't any evidence, is there? 16 A. The evidence for the Daily Mail being involved in phone 17 hacking for me would be the article we spoke about 18 earlier, the plummy-voiced woman, and it would be Paul 19 McMullen's answer to this question. 20 Q. Okay. Let's look at the answer then: 21 "Oh, absolutely, yeah. When I went freelance in 22 2004, the biggest payers -- you'd have thought it would 23 be the News of the World, but actually it was at 24 Daily Mail. If I take a good picture, the first person 25 I go to is, such as in your case, the Mail on Sunday. Page 126</p>	<p>1 but I have no reason to believe that his answer, "Oh, 2 absolutely, yeah", referred to the Daily Mail being 3 involved in phone hacking. 4 Q. Okay, Mr Grant. I have to ask this blunt question. 5 We'll hear from Mr McMullen and have his version. Had 6 he been drinking? 7 A. Had I been drinking? 8 Q. No, had Mr McMullen been drinking? 9 A. He didn't seem drunk at all. 10 Q. He didn't? 11 A. No. 12 Q. And then you say: 13 "But would they, the Mail, buy a phone-hacked 14 story?" 15 Isn't that a bit of an odd question, given that he 16 hadn't referred to a phone-hacked story? 17 A. It's not an odd question at all, given that he'd just 18 done this strange segue. So there's me trying to get 19 him back on the interesting bits. It's not interesting 20 that they bought photographs of me broken down; it's 21 very interesting whether they were involved in phone 22 hacking or not. So what I do is I immediately -- and 23 there's no dot dot dots here -- I say, "but would they, 24 the Mail, buy a phone-hacked story?" To which he 25 answers: Page 128</p>

<p>1 "For about four or five years, they've been 2 absolutely cleaner than clean, and before that, they 3 weren't. They were as dirty as anyone. They had the 4 most money." 5 Q. It's a matter for comment, but he's not given any 6 details there of any specific phone hacking activity by 7 the Daily Mail, has he? 8 A. No. 9 Q. Then we can read on. Some of the rest of what he says 10 is quite controversial, so it's probably best if I don't 11 read it out, but -- 12 A. I thought this Inquiry was full of controversy. 13 Q. But some of it is controversial in the sense, Mr Grant, 14 that it names particular names of people who -- 15 A. So? 16 LORD JUSTICE LEVESON: Well, I'll explain. You know 17 perfectly well there's a police investigation going on. 18 A. Ah, well that, yes. 19 LORD JUSTICE LEVESON: And I have to be extremely careful -- 20 A. I understand that. 21 LORD JUSTICE LEVESON: -- that I don't prejudice any 22 potential prosecution. 23 A. Yes, of course. 24 LORD JUSTICE LEVESON: And I'm sure you wouldn't want to 25 either.</p> <p style="text-align: center;">Page 129</p>	<p>1 A. Good luck. 2 Q. The position will be fully explored with him. 3 A. Yes. 4 Q. That's a helpful vignette into the case, the McMullen 5 incident, but you also tell us about -- and I'm back to 6 paragraph 27 of your witness statement. Earlier this 7 year, officers from Operation Weeting came to see you -- 8 and we've heard two other witnesses today speak about 9 the same sort of situation -- and they told you that 10 your phone had been hacked. Could you just tell us 11 a little bit about that, that meeting, please? 12 A. Yes. They rang my lawyer -- the police rang my lawyer, 13 wanted to show me some evidence. They came around and, 14 as was one of the previous witnesses today explained, 15 it's quite a formal thing. They get out these pages and 16 they formally announce them, then they say, "Would you 17 have a look at this page. Is there anything you 18 recognise?" And I looked at it and saw various phone 19 numbers of mine from the middle of the 2000 up to about 20 2005, something like that, together with some PIN 21 numbers, together with some access numbers. You know, 22 you used to get a separate phone number to ring your 23 messages remotely from another phone. And then there 24 were other names I recognised on there. People around 25 me, girlfriends, people I knew, numbers, words that all</p> <p style="text-align: center;">Page 131</p>
<p>1 A. No, I wouldn't. 2 MR JAY: It is right to say, in case I sound too coy, that 3 this has been published in the New Statesman, it's in 4 the public domain. 5 A. Yeah. 6 Q. Anybody can Google it. 7 A. Yes. 8 Q. And frankly, we'll leave it at that, if you don't mind. 9 Are you saying, for clarity, Mr Grant, that if the 10 Inquiry wanted to listen just to the bits of the tape 11 which we have been discussing specifically, it's 12 something which you would be comfortable with or 13 uncomfortable with? 14 A. Those bits, yes, because I don't think they send 15 McMullen to prison, so it's fine. 16 LORD JUSTICE LEVESON: I ought to make clear I'm not being 17 too coy about the investigation. I've made some rulings 18 about how we're going to go and we're going to do it, 19 but I don't want to add unnecessary material into the 20 public domain beyond that which it's necessary for me to 21 go to identify the culture, practice and ethics of the 22 press. 23 A. I get that. 24 MR JAY: To be absolutely clear, we are hearing from 25 Mr McMullen as well.</p> <p style="text-align: center;">Page 130</p>	<p>1 sort of made sense. 2 In one particular case, it triggered a memory of 3 a couple of stories that had been in the Daily Mirror 4 and in the Daily Mail and I found that interesting. But 5 when you see these pieces of paper in the police 6 inquiry, they redact certain bits, including the famous 7 top left-hand corner, which is where Mulcaire kept the 8 initials of the particular journalist who had 9 commissioned the phone hacking, and so subsequent to 10 that interview with the police, I was very interested to 11 know who had commissioned that particular page of 12 hacking, seeing as it hadn't -- this particular story 13 had not appeared in the News of the World but had 14 appeared in the Daily Mail and the Daily Mirror. 15 Q. Again, you mention the Daily Mail. You mentioned it for 16 the first time because it's not in your witness 17 statement. 18 A. Yes, it is. 19 LORD LEVESON: 28. 20 MR JAY: Yes, my apologies, you have. 21 LORD JUSTICE LEVESON: Just for the avoidance of doubt, the 22 top corner, which of course we're cyphering again for 23 the reasons I've explained, that was in fact somebody 24 who you linked to News of the World? 25 A. To get access to the redacted top left-hand corner,</p> <p style="text-align: center;">Page 132</p>

<p>1 I was told I had to ask for it formally through a court. 2 I had to get a disclosure order from the Metropolitan 3 Police, so I got it and it was in fact, or seemed to be, 4 a journalist from the News of the World. So that is 5 a mystery that he commissioned the work but it appeared 6 in the Mail and the Mirror. 7 MR JAY: A mystery we're not, I believe, going to be able to 8 get to the bottom of today or possibly at all. 9 May I move on, please, to your supplementary 10 statement. This deals with quite recent events, 11 culminating in the grant of an injunction last week by 12 Mr Justice Tugendhat, and we've seen a copy of his 13 judgment. 14 First of all, can I ask you, please, to look at HG2, 15 which will be behind your witness statement in this 16 bundle, not as a separate tab. I'm not going to go into 17 this in much detail unless you want me to. It relates 18 to a front page of the News of the World. The greeting 19 is "Happy Easter". It's 24 April of this year. It 20 looks as if these are photographs taken with a telephoto 21 lens; is that right? 22 A. I would imagine so, yes. I was definitely unaware they 23 were being taken. I wish I could find the piece of 24 paper. Give me another clue where it's in. What's the 25 tab number?</p> <p style="text-align: center;">Page 133</p>	<p>1 asked to comment before the piece was published, along 2 with the photographs? 3 A. Correct. 4 Q. Had you been asked to comment, what might you have said? 5 A. I would have said nothing. There would have been no -- 6 I wouldn't have returned the calls. No one would have 7 returned the calls. 8 Q. Might you have taken proactive steps to protect your 9 privacy, for example by taking legal proceedings? 10 A. If I'd done that, it would have drawn attention to the 11 whole story. My overwhelming motive throughout this 12 whole episode was to protect the mother of my child from 13 a press storm, so anything like what you've just 14 suggested would have been one way of alerting the media. 15 It would have been a matter of public record, and they 16 would have thought: "Oh, here's a good story", and her 17 life would have been made hell, as it subsequently was. 18 Q. Turning that on its head, by doing nothing, your life 19 and her life was made hell anyway, wasn't it? 20 A. Well, we held them off for a surprisingly long time. 21 After this article, they followed her around. She was 22 a single pregnant woman, she was being tailed by 23 paparazzi, one in particular who frightened her a lot, 24 over the months of her pregnancy, but they didn't have 25 anything to print that could link her to me until</p> <p style="text-align: center;">Page 135</p>
<p>1 Q. It's under tab 2. If you go through the first six or 2 seven pages, you'll reach the end of your witness 3 statement and then you should find the start of an 4 exhibit, HG2, and the first three pages of the exhibit 5 are the article we are referring to. Are you with me on 6 that? 7 A. Obviously, I'm being stupid. I'm on the second tab -- 8 Q. Third tab. 9 A. It's the third tab? 10 MR SHERBORNE: Can Mr Grant be handed a clean copy? 11 LORD JUSTICE LEVESON: He can have my copy if there's any 12 problem with it. 13 A. Thank you very much. 14 MR JAY: Thank you, sir. 15 LORD JUSTICE LEVESON: Is it vertical(?) one underneath the 16 statement? 17 MR JAY: Yes. 18 LORD JUSTICE LEVESON: So do you have it now? 19 MR JAY: We're not concerned with the headline and we're not 20 concerned with the detail, unless you want to discuss 21 it. The real point is this is a telephoto lens, 22 clearly, and you were unaware that these photographs 23 were being taken? 24 A. Correct. 25 Q. And you also say in your statement that you weren't</p> <p style="text-align: center;">Page 134</p>	<p>1 I visited the hospital after the birth when, again, 2 there seems to have been a leak from the hospital. At 3 that point, the dam was breached and we were bombarded 4 with calls saying, "We know that this happened, that 5 Tinglan had a baby in the hospital and Hugh visited", 6 and they even knew the fake name she checked into the 7 hospital under. So clearly there had been a leak. 8 Then, again, my attitude was to say nothing, which 9 we did for a long time, and a lot of pressure was put 10 on, the typical pressure of the tabloids. In this case, 11 it was the Daily Mail who seemed to have all the 12 information, the details of the hospital and the fake 13 name, et cetera. They kept saying, "We're going to 14 print this story anyway; what's your comment?" And 15 because I've got wise to this technique over the years, 16 it seemed to me that was a fishing technique and that 17 they didn't want to print the story based solely on 18 their hospital source because that might have been 19 unethical or possibly illegal, so they needed a comment 20 from my side and that is why I said nothing and I asked 21 all my various -- like my assistant in London and my PR 22 people in America, who didn't even know about this baby, 23 to say nothing as well. 24 Q. We're moving ahead a bit. There's some quite important 25 detail before we get to that stage.</p> <p style="text-align: center;">Page 136</p>

<p>1 A. Okay, I'm sorry. 2 Q. Particularly in paragraph 5 with your appearance on 3 Question Time in July. 4 A. Yeah. 5 Q. Then you tell us about the phone calls to -- 6 A. Tinglan. 7 Q. -- Ms Hong's phone number? 8 A. Yeah. 9 Q. And we see what you say about it. The man said, "Tell 10 Hugh Grant to shut the fuck up." 11 After that, were the police involved? 12 A. When she told me about the next day, I immediately 13 called my lawyer and we agreed to get the police onto 14 it, which we did, but at the last moment Tinglan, the 15 mother, probably rightly in retrospect, said, "Let's not 16 do that because there's always a chance of a leak from 17 the police and that will bring down the press storm on 18 my head", so we didn't. 19 Q. Taking that in stages, the contact was made with the 20 police. The police were willing to assist, were they 21 not? 22 A. Yes. They were. 23 Q. But then they were, as it were, called off because of 24 concern about leaks from the press to the police. 25 That's the sequence of events, isn't it?"</p> <p style="text-align: center;">Page 137</p>	<p>1 the Metropolitan Police were on back-handers from the 2 tabloid press. 3 Q. I think there you're commenting on other people's 4 evidence. Can we try and confine it to your own 5 evidence? 6 A. Sure. It wasn't just me who experienced this phenomenon 7 of reporters or paparazzi coming around instead of 8 a policeman. Other people who had been in the public 9 eye who I used to have this conversation with complained 10 of exactly the same thing. 11 Q. Right. I think what I'm trying to do is trying to ask 12 you to give an example of something which might give 13 rise to the inference that there was a leak from the 14 police to the press, a particular example from your own 15 experience, not you commenting on someone else's 16 experience. 17 A. Well -- 18 Q. Do you see my point? 19 A. Yeah. I'm trying to think of a specific one. 20 I certainly remember my one girlfriend being mugged and 21 we called the police and it was photographers who came 22 around first. 23 Q. Okay. Thank you. 24 Going back to your second witness statement, you 25 visited the hospital, I think, the day after the child's</p> <p style="text-align: center;">Page 139</p>
<p>1 A. From the police to the press. 2 Q. Police to the press. 3 A. Yes. 4 Q. You touch on this or you deal with this in the final 5 sentence of paragraph 6 of your second statement. 6 A. Yeah. 7 Q. I'm going to ask you to try and exclude from your mind 8 supposition, speculation and opinion. Do you have any 9 direct evidence of leaks from the police to the press of 10 which you can give us evidence, Mr Grant? 11 A. I'm not quite sure where supposition blends into 12 evidence, but -- 13 Q. What do you have direct knowledge of? Can we start with 14 that? 15 A. All I know is that for a number of years, although it 16 did get better in recent years, if someone like me 17 called the police for a burglary, a mugging, something 18 in the street, something that happened to me or my 19 girlfriend, the chances are that a photographer or 20 reporter would turn up on your doorstep before 21 a policeman. So whether you call that supposition or 22 fact, I don't know. 23 On top of that, I have, of course, also all Paul 24 McMullen's recorded testimony -- not testimony, but what 25 he said about paying the police, you know, a third of</p> <p style="text-align: center;">Page 138</p>	<p>1 birth? 2 A. Yes. 3 Q. I think, if you don't mind me giving the date so it fits 4 into the chronology, it's the end of September, isn't 5 it? 6 A. Yes. 7 Q. And what happened after that visit in terms of press 8 interest? 9 A. Well, I had been very reluctant to be present at the 10 birth because of the danger of a leak from the hospital 11 bringing this press storm down on the mother of my child 12 and what was about to be my child. 13 Q. Yes. 14 A. So I had actually made a plan with the mother not to 15 visit at all, but to visit when she got home from 16 hospital a few days later. She was very happy with that 17 plan, she had her parents there, she had my cousin 18 there, my female cousin. But actually, on the day after 19 the birth, I couldn't resist a quick visit. I thought: 20 "I am going to try and get away with this." I went, 21 I had a look, it was very nice, but the day after that 22 I think it was, the phone calls started from the 23 Daily Mail in this case, saying, "We know about Tinglan 24 having had this baby, we know about Hugh having visited, 25 we know what name she checked in under, we're going to</p> <p style="text-align: center;">Page 140</p>

<p>1 write this story." So all my fears about the leak 2 seemed to have been justified.</p> <p>3 Q. The evidence you provide to the Inquiry in relation to 4 that -- this, again, is in the exhibit HG2, which I hope 5 you're going to be able to find in that bundle, or we 6 can provide it to you separately. There are examples of 7 emails and texts dated 21 October, which is three weeks 8 and a bit after the birth.</p> <p>9 A. Yes. Thank you.</p> <p>10 Q. To be clear about this, the Daily Mail did not publish 11 a story, did they, until the news had been broken by 12 someone else? That's right, isn't it?</p> <p>13 A. They threatened to, but because we didn't comment, they 14 didn't, and so it was broken by an American magazine.</p> <p>15 Q. You say they threatened to, but another way of looking 16 at this is that until they had a comment from you 17 confirming the truth of the story, they quite rightly 18 decided not to publish. Would that be fair?</p> <p>19 A. That would be wrong. It doesn't say it in these emails, 20 but you could bring in my assistant or my publicity 21 people in New York, who started to get the calls as 22 well, and on these phone calls it was consistently: "We 23 are publishing this story tomorrow", which is a tactic 24 of brinkmanship to make you say something so they can 25 stand up a story which would otherwise have to stand up</p> <p style="text-align: center;">Page 141</p>	<p>1 these calls, come from that same journalist, now 2 representing the Daily Mail.</p> <p>3 Q. That's right. There's no evidence that that journalist, 4 though, took any photographs with him from the 5 News of the World to the Daily Mail, is there?</p> <p>6 A. The photographs subsequently published in the Daily Mail 7 when they did publish a story about my baby, some of 8 those came from -- are identical to the pictures used 9 earlier by the News of the World, so whether he took the 10 pictures himself or one of his photographers took the 11 pictures, they are the same pictures that the 12 News of the World used, long lens surveillance shots, 13 that the Daily Mail subsequently published more 14 recently.</p> <p>15 Q. Right. But those pictures could have been purchased 16 from the same paparazzo -- that's the singular of the 17 noun -- who had provided the photographs to the 18 News of the World originally, couldn't they?</p> <p>19 A. Yes, they could.</p> <p>20 Q. I'm going to deal, slightly out of sequence, before 21 going back, with the incident which culminated in 22 injunction proceedings in front of Mr Justice Tugendhat. 23 You cover this in paragraph 20 of your supplementary 24 statement.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 143</p>
<p>1 entirely on a piece of leaked information from 2 a hospital.</p> <p>3 Q. Whatever they were saying to you in order to try to get 4 you to confirm or deny the story, it is an incontestable 5 fact they didn't publish the story, did they?</p> <p>6 A. They did not, no.</p> <p>7 Q. And it's a fair inference, isn't it, that the reason 8 that they didn't publish the story was that you hadn't 9 confirmed its truth?</p> <p>10 A. I disagree with your interpretation. I think the reason 11 they didn't publish it was because they would not have 12 looked good to have published it merely on leaked 13 information from a hospital, which is unethical.</p> <p>14 Q. But they might have obtained the information from 15 somewhere else altogether, mightn't they?</p> <p>16 A. It's possible, but so highly unlikely that I find it 17 incredible.</p> <p>18 Q. Was there interest from other newspapers at this time?</p> <p>19 A. There was the Daily Star, I think, were onto it in some 20 way, yeah. But originally the whole story had been the 21 subject of a -- back in the days of the pregnancy, had 22 been the subject of News of the World interest, one 23 journalist in particular. When the News of the World 24 was closed down, that journalist appears to have moved 25 over to the Daily Mail, because a lot of this work,</p> <p style="text-align: center;">Page 142</p>	<p>1 Q. Potentially it was a very dangerous incident, because 2 the grandmother of the child had to jump out of the way 3 of the car in which was one or more of these individuals 4 with the cameras; that's correct, isn't it?</p> <p>5 A. Yes. The house where the mother of my child and my 6 child were besieged was surrounded by these paparazzi, 7 and I asked my lawyer what could possibly be done. He 8 said maybe if they get some pictures of some of these 9 people, we could have a chance, ask them to be called 10 off. So the mother -- the 61-year-old grandmother of my 11 child went out into the street, took a picture of a man 12 sitting in a car with a great big camera. He turned 13 around, took a lot of pictures of her, wound the window 14 down, shouted a lot of abuse at her, and then as she 15 crossed the door, he menaced her with his car, drove at 16 her very fast, made her jump out of the way, and then at 17 the end of the road, he did a u-turn and came back and 18 menaced her again with the car.</p> <p>19 Q. I think the police were also involved, were they not?</p> <p>20 A. The police have been called and they are coming to see 21 Tinglan on Wednesday about this.</p> <p>22 Q. Oh, right. At the time, my understanding is that the 23 police offered to go around and to get a statement or 24 investigate the matter with the mother and the 25 grandmother. Do you know about that?</p> <p style="text-align: center;">Page 144</p>

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<p>1 A. I think -- I can't remember. I think we may have 2 thought about that. I can't remember the exact facts, 3 but certainly the police should be involved in this. 4 Q. Yes. But the police did want to become involved, and 5 they were told -- and there's no suggestion that this is 6 improper -- they were told by your solicitor you'd 7 prefer in the first instance to get an injunction. Is 8 that possible? 9 A. Well, that may be true that my solicitor said that, and 10 he may well have been in the right in that a police 11 investigation would have taken some time. It might have 12 in the end put one bad pap away, but there were a whole 13 bunch of them outside, and seeing as this was an 14 egregious event, likely to warrant an injunction against 15 all of these people, that seems like the right tactic 16 that he adopted. 17 Q. Yes. No one's questioning the tactic or the strategy. 18 A. Okay. 19 Q. And we know what has happened and we've read the reasons 20 of Mr Justice Tugendhat in a publicly available 21 judgment. 22 A. Okay. 23 Q. But as a little coda to these serious matters, your 24 publicist put out a statement about the birth. 25 A. In the end.</p> <p style="text-align: center;">Page 145</p>	<p>1 "I can confirm --" 2 This is your publicist speaking on your behalf? 3 A. Yes. 4 Q. "... Hugh Grant is the delighted father of a baby girl." 5 So far so good, as it were. 6 "He and the mother had a fleeting affair and while 7 this was not planned, Hugh could not be happier or more 8 supportive." 9 A. Mm. 10 Q. Putting it bluntly, weren't you leading with the chin 11 a bit, perhaps, with that form of words? 12 A. Well, as I just said to you, I felt it was important to 13 be honest and not to have a wrong version, a twisted 14 version appear in the papers which was that she was my 15 girlfriend who had been dumped when she got pregnant, 16 which was simply not the case, or that it was a planned 17 pregnancy that I then ran away from. So I was 18 protecting her reputation as a -- I didn't want her to 19 appear to be a jilted girlfriend. I was protecting 20 mine -- I didn't want it to seem that I was a monster 21 who ran away from my girlfriend. It's true I've been 22 given a hard time for using those words because -- which 23 is ironic, seeing as it's actually the truth, but that 24 doesn't seem to be very popular. 25 Q. Well, one alternative strategy might have been simply to</p> <p style="text-align: center;">Page 147</p>
<p>1 Q. Is that right? 2 A. Yeah, in the end, having held off all that time from all 3 these inquiries and this brinkmanship from the British 4 papers, a magazine in America, US magazine, seemed to 5 have got hold of the story and they published, at which 6 point I was in a sort of no-win situation. I, in the 7 end, decided the best thing to do -- because the story 8 within hours was going to go everywhere, particularly 9 into the British tabloids and I was very anxious that 10 they would give it a twisted spin, so I thought the best 11 thing to do would be to be as honest about the thing as 12 possible, so I said I was delighted with the birth but 13 I did not want the papers to write a twisted version 14 which suggested that Tinglan was a jilted girlfriend, so 15 I tried to find a form of words to say that she was 16 a friend but had not been a formal girlfriend and that 17 therefore there was no question of her having been 18 jilted as a pregnant mother. 19 Q. Was it your form of words or your publicist's form of 20 words? 21 A. We had a hasty conversation on the phone while I was 22 filming in Germany. It was not ideal circumstances. 23 I was dressed as a cannibal at the time. 24 Q. Maybe you were, but the form of words which were 25 alighted upon were these:</p> <p style="text-align: center;">Page 146</p>	<p>1 confirm the birth of the child and that you're 2 a delighted father, but otherwise words to the effect: 3 "This is a private matter and neither the mother nor the 4 father wish to comment further." 5 A. Yes, which would have been an invitation to the papers 6 to write something invented about the relationship that 7 I had with that girl. In the absence of information, 8 they'll make it up. 9 Q. You see, what did happen in response to the form of 10 words you selected -- you alight in one piece in the 11 Daily Mail by Amanda Platell, which is written in 12 a particular tone or house style, but other newspapers 13 have put in similar pieces, as you're aware. Giles 14 Coren in the Times saying words to the effect that you 15 should marry the woman, there's some even in the 16 Guardian, which isn't altogether complimentary, and 17 something in the Daily Telegraph. It could be said all 18 organs of the press are intruding into your privacy, but 19 the theme from each of them is not inconsistent. Do you 20 know what I mean? 21 A. First of all -- well, first of all, there were some 22 supportive pieces as well, especially in the broad 23 sheets, that said that -- you know, gave me some credit 24 for having put my hand up and said, "This is my baby and 25 I'm delighted with it", and providing for the child and</p> <p style="text-align: center;">Page 148</p>

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<p>1 the mother. The hatchet jobs -- that's fine; I expect 2 hatchet jobs. That's been the story of the last 17 3 years. But it always does make you grind your teeth 4 slightly when they're based on falsities and 5 misreporting and a lot of those hatchet jobs were based, 6 for instance, on the fact that I now had a 21-year-old 7 German girlfriend, whereas in fact I don't. That was an 8 invented girlfriend, invented by a German tabloid and 9 then copied out faithfully by British hacks and it was 10 also based on -- the hatchet jobs were based on the fact 11 that I'd appeared to only visit for half an hour 12 callously the day after the birth, when in fact if I'd 13 been a really good father, I wouldn't have visited at 14 all, seeing as it brought down a press storm on the 15 mother's head.</p> <p>16 Q. I'll just finish this little sequence of evidence before 17 we'll break, but in terms of your privacy, is it your 18 position that that these matters should not have been 19 covered at all in the press or is it your position that 20 they should have been covered in a certain way, in a way 21 which didn't misrepresent?</p> <p>22 A. Well, if you cling to the naive notion that newspapers 23 are there to report the truth, nothing could really be 24 wrong with that. I mean, I had a baby with this girl. 25 She's a good friend of mine, she still is a good friend.</p> <p style="text-align: center;">Page 149</p>	<p>1 possible for some people to see a connection between 2 those hatchet jobs and what I'm saying here and have 3 said for the last few months.</p> <p>4 Q. Yes, the bit that you throw in about paying off someone 5 at the Portland Hospital, that is, I must say or must 6 suggest, just a piece of speculation on your part. You 7 don't know that that's how the story broke at all, do 8 you?</p> <p>9 A. Unless my cousin rang up the Daily Mail and told them, 10 or the Chinese parents who speak no English did that, 11 it's very hard to draw any other conclusion.</p> <p>12 Q. Do you know how the American paper or magazine got hold 13 of the story?</p> <p>14 A. No.</p> <p>15 MR JAY: Sir, this may be a convenient moment to break.</p> <p>16 LORD JUSTICE LEVESON: All right. We'll have a break and 17 you can have a break, too, but let me just ask this: 18 you've been granted relief by Mr Justice Tugendhat; has 19 that grant of relief been reflected in your child and 20 matter mother being left alone?</p> <p>21 A. Yes. Very grateful for it.</p> <p>22 LORD JUSTICE LEVESON: You'll be conscious that I've made it 23 clear that I would want to know if intrusion arose as 24 a result of anybody giving evidence to this Inquiry.</p> <p>25 A. Yes, I heard that and I'm grateful for that, too.</p> <p style="text-align: center;">Page 151</p>
<p>1 It's a nice thing. There's really not much more to it 2 than that, but that doesn't sell newspapers, so a nasty 3 spin has to be given to it, hence the extraordinary 4 efforts of various newspapers to dig dirt on the new 5 mother happily enjoying her new baby while the 6 Daily Mail paid £125,000 to her ex-lover to sell private 7 pictures of her.</p> <p>8 Q. I think your complaint is it's not the intrusion into 9 your privacy per se; it is the nasty spin they put on 10 a story which, had they reported in a fairer and more 11 accurate way, would have been a proper story for them to 12 print. Is that right?</p> <p>13 A. No, it's both. There are moments here which are 14 intrusions into privacy. I think that if you have paid 15 off someone at the Portland Hospital to tell you about 16 a celebrity's baby, that's an invasion of privacy, for 17 instance. But there's also ugly spin being put on a lot 18 of this stuff because it sells papers better, and in the 19 opinion of some people, the particularly ugly spin in 20 the last few weeks given to the birth of my baby was not 21 unrelated to the fact that I'm here today giving 22 evidence at this Inquiry, and it's referenced in some of 23 those hatchet jobs, including by Amanda Platell. She 24 gives my concern about abuses of tabloid press as 25 a particular reason why I should be loathed. So it is</p> <p style="text-align: center;">Page 150</p>	<p>1 MR SHERBORNE: Sir, before you rise, can I deal with two 2 very brief matters of chronology?</p> <p>3 The first was raised in relation to the 1996 Daily 4 Mirror article that Mr Grant refers to in paragraph 13 5 of his witness statement. Sir, you asked that it might 6 be possible that we would have the dates. Can I just 7 give you those dates, because we've managed to obtain 8 them.</p> <p>9 LORD JUSTICE LEVESON: Yes.</p> <p>10 MR SHERBORNE: As I understand it, the visit to the hospital 11 was in May 1996, 29 May.</p> <p>12 LORD JUSTICE LEVESON: Yes. That -- yes.</p> <p>13 MR SHERBORNE: The article which appeared in the Sunday 14 Mirror was on 23 June of 1996. The adjudication was not 15 until 27 July of 1997. So Mr Grant in his recollection 16 perhaps was being somewhat generous. It took over 17 a year for that adjudication to arise.</p> <p>18 As I understand it, a legal claim was issued 19 in October of 1997, which resulted somewhat more 20 speedily in the judgment that he refers to in 21 paragraph 14 being given in his favour in December, only 22 some two months later.</p> <p>23 LORD JUSTICE LEVESON: Right. Thank you.</p> <p>24 MR SHERBORNE: Then can I move on secondly to the 25 injunction. Mr Jay referred to the report to the police</p> <p style="text-align: center;">Page 152</p>

<p>1 and the decision to follow a civil course instead, or at 2 least in the first instance. Can I just remind you, 3 sir, that the incident relating to the paparazzo who was 4 trying to run over Mr Grant's baby's grandmother took 5 place on Thursday, 10 November, and I applied the next 6 day for an emergency injunction on Friday, 11 November, 7 which was granted by Mr Justice Tugendhat, although his 8 reasons arrived a week later. The purpose, of course, 9 was to immediately bring the campaign to an end, which, 10 as you've just heard, it did, with remarkable 11 efficiency.</p> <p>12 That's all I wanted to say, sir.</p> <p>13 LORD JUSTICE LEVESON: Yes, and this chronology actually 14 comes out of Mr Justice Tugendhat's judgment?</p> <p>15 MR SHERBORNE: It does, sir.</p> <p>16 LORD JUSTICE LEVESON: Which we have.</p> <p>17 MR SHERBORNE: We do.</p> <p>18 LORD JUSTICE LEVESON: Thank you very much. We'll have ten 19 minutes or as long as Mr Grant needs.</p> <p>20 (3.17 pm)</p> <p>21 (A short break)</p> <p>22 (3.25 pm)</p> <p>23 MR JAY: Mr Grant, I have been asked to clarify one matter 24 we covered earlier this afternoon. It's in your first 25 witness statement and it's in paragraph 28, please.</p> <p style="text-align: center;">Page 153</p>	<p>1 Q. First of all, it shows a picture. It says that you're 2 holding hands with someone but if one looks closely at 3 the photograph -- I'm not giving expert evidence here -- 4 it doesn't in fact look as if you are holding hands.</p> <p>5 A. Correct; you can see the palm of her hand.</p> <p>6 Q. Yes. Is the woman in the photograph, as it were, 7 correctly depicted?</p> <p>8 A. Again, I -- I'm useless with this folder. I can't --</p> <p>9 Q. We provided it to you separately.</p> <p>10 MR SHERBORNE: Can I hand up my copy?</p> <p>11 MR JAY: Yes.</p> <p>12 MR SHERBORNE: I don't think Mr Grant has this. (Handed)</p> <p>13 MR JAY: No.</p> <p>14 A. So, there's three girls in this article, three pictures 15 of three girls.</p> <p>16 Q. Yes. We're looking at the one at the bottom of the 17 page.</p> <p>18 A. Sorry, two girls.</p> <p>19 Q. Yes.</p> <p>20 A. Yes. Is that --</p> <p>21 Q. It's the same girl?</p> <p>22 A. That is the same girl.</p> <p>23 Q. Yes. Because to be clear, the article on the following 24 day, 4 November, is some different young woman 25 altogether?</p> <p style="text-align: center;">Page 155</p>
<p>1 A. Yes.</p> <p>2 Q. You refer to a detailed expose story written by both the 3 Mirror and the Mail. I won't ask you for details of the 4 story as such, but can you help us with details as to 5 the approximate date?</p> <p>6 A. Yeah, summer 2004.</p> <p>7 Q. Thank you.</p> <p>8 Go back to the issue of press misreporting and 9 particularly in the context of your supplementary 10 statement. You refer in that statement to two articles 11 in the Sun, don't you?</p> <p>12 A. Do I? What do I say?</p> <p>13 LORD JUSTICE LEVESON: Let's look at it. What paragraph is 14 it?</p> <p>15 MR JAY: Paragraph 17, towards the bottom of that paragraph.</p> <p>16 A. Yeah.</p> <p>17 LORD JUSTICE LEVESON: This is the second statement?</p> <p>18 MR JAY: It is, yes, pardon me.</p> <p>19 LORD JUSTICE LEVESON: Thank you.</p> <p>20 MR JAY: I don't really want to go over too much of the 21 detail of this unless you're content that I do so. 22 You've seen, I think, the article in the Sun on 23 3 November. That's been provided to you today, hasn't 24 it?</p> <p>25 A. Mm.</p> <p style="text-align: center;">Page 154</p>	<p>1 A. That's right. On the following day, the Sun published 2 this article saying, "Hugh a new girl three weeks before 3 baby", and there's a picture of me and a girl, who is 4 not the same girl. In fact, I have no idea who she is. 5 One of the reasons why they're unable to find any 6 pictures of me and my new German girlfriend is because 7 I don't have one. So they have had to find a picture of 8 just me and some girl.</p> <p>9 Q. To be fair to the article -- I'm just looking at what it 10 says and not any inferences or innuendo which might be 11 drawn from it -- this woman is not described as your 12 girlfriend, is she?</p> <p>13 A. What, you want me to read the whole thing now?</p> <p>14 Q. I think you've had the chance to look at it. Maybe 15 you'll trust me. She's not described as your 16 girlfriend, is she?</p> <p>17 MR SHERBORNE: I don't think Mr Grant has had a chance to 18 look at that. He hasn't seen that before.</p> <p>19 LORD JUSTICE LEVESON: I'm sorry about that. Then he ought 20 to have the chance to read it.</p> <p>21 MR JAY: Yes.</p> <p>22 A. Well, I don't know. To me, the headline, "Hugh a new 23 girl three weeks before baby" suggests girlfriend, but 24 maybe I'm reading a different language.</p> <p>25 MR JAY: Mm, okay. I'm just trying to be fair to the</p> <p style="text-align: center;">Page 156</p>

<p>1 authors of this piece, Mr Grant. It's for others to 2 make a judgment about it.</p> <p>3 A. You've been very, very fair to News International and to 4 Associated today.</p> <p>5 Q. I hope I've been fair to everybody.</p> <p>6 A. You told me back stage you were going to bowl me 7 straight balls, but if these are straight balls, I'd 8 hate to see your googlies.</p> <p>9 Q. Let me continue to bowl you straight balls. It also 10 reports the woman's denial that this is other than 11 a friendship, doesn't it?</p> <p>12 A. It does. Right down at the bottom line at the end of 13 the article.</p> <p>14 Q. But then it does add in the middle a local report, which 15 is the report from the German magazine, Bild?</p> <p>16 A. Correct, which said there had been -- after this dinner, 17 this innocent dinner I'd had with this German girl -- 18 not this one but the one pictured on the page before. 19 I'd had a completely innocent dinner, dropped her off in 20 a taxi, and because the paparazzi had got a rather 21 boring shot of a man getting into a taxi with a girl, 22 woman, either he or his agency or Bild invented 23 passionate kissing in the taxi, because there 24 emphatically was none. And yes, I do know I'm under 25 oath here. This is tittle-tattle. I only went on about Page 157</p>	<p>1 either ask me or that they'd bothered to listen to the 2 girl's two denials.</p> <p>3 LORD JUSTICE LEVESON: Is it possible to do something about 4 this in Germany?</p> <p>5 A. Well, really, it's not a big -- it's not like it's 6 libellous. I was merely giving an example of the use of 7 lazy reporting and misreporting to beat someone up 8 a bit, if there was an agenda for beating someone up.</p> <p>9 LORD JUSTICE LEVESON: I understand your point.</p> <p>10 A. If the girl had been 12, I would have sued.</p> <p>11 LORD JUSTICE LEVESON: I understand the point entirely, but 12 I'm trying to understand what I can put a box around in 13 this country, whether by way of recommendation or 14 otherwise, and what impact that might have elsewhere in 15 the world to somebody who isn't merely a national figure 16 but has international status. Do you see the point --</p> <p>17 A. I think so.</p> <p>18 LORD JUSTICE LEVESON: -- I'm grappling with, that I've --</p> <p>19 A. If the story emanates from abroad, as this one did, your 20 recommendation, whatever it might be, would have to be, 21 you know, that you at least have to check the facts or 22 perhaps -- I mean, it is hard for me to believe we're 23 going to quarrel for hours over a piece of 24 tittle-tattle. It doesn't really matter that much.</p> <p>25 LORD JUSTICE LEVESON: I'm not concerned about this Page 159</p>
<p>1 it in my supplementary statement because it was 2 a particular stick used to beat me round the head with 3 during the birth of my daughter, and, some people think, 4 because I'm here giving evidence to the Leveson Inquiry. 5 So they look for any stick they can find and -- oh yeah, 6 much too young girlfriend, even though she doesn't 7 exist, and even though she had twice denied that she was 8 my girlfriend. It wasn't just in the Sun. It was in 9 many, many papers.</p> <p>10 Q. I'm not putting a point of view. I'm just seeking to 11 analyse what appears in this article and receive your 12 comment upon it, and you've kindly given me that. Okay.</p> <p>13 LORD JUSTICE LEVESON: Could I just ask you: what's the 14 position of the papers in Germany? Have they reported 15 you in the way in which you've complained about being --</p> <p>16 A. Yes, yes, yes, and it wouldn't just be in Germany now. 17 It's everywhere. I say in my main statement, you know, 18 this is one of the problems, that if something's 19 misreported, it just splatters all around the Internet 20 instantly. So this is now fact that I have a new 21 21-year-old German girlfriend all round the world. 22 Well, so what? It doesn't really matter that much 23 except when it's used, you know, as a stick to beat me 24 with again and again, and then it does become a little 25 wearying, and you sort of wish that they'd bothered to Page 158</p>	<p>1 particular article in terms.</p> <p>2 A. I know.</p> <p>3 LORD JUSTICE LEVESON: Indeed, as you probably know, this 4 part of this Inquiry isn't about who precisely did what 5 at what circumstance to whom. I'm trying to look at 6 a bigger picture.</p> <p>7 A. Yes.</p> <p>8 LORD JUSTICE LEVESON: And the bigger picture is not merely 9 the whole question of regulation of the press in this 10 country and their culture and practices, but also how 11 that is impacted or affected by what happens abroad or 12 what happens on the Internet. You heard the question 13 I asked this morning.</p> <p>14 A. Mm.</p> <p>15 LORD JUSTICE LEVESON: So I'm just trying to bet a bigger 16 picture.</p> <p>17 A. All I can say is when it comes to stories being copied 18 around the world, they are copied from the Internet, and 19 they're particularly copied if they come from a website 20 that belongs to a newspaper because newspapers are 21 generally considered to have a certain gravitas and to 22 have been -- the news-gathering techniques to have 23 a certain professionalism, albeit often that may be 24 a mistaken assumption. But that is why -- you know, if 25 a story is in a -- on a newspaper website, it will Page 160</p>

<p>1 scatter much faster than if it's just on someone's blog 2 or it's a tweet or something like that. I can sense 3 I haven't answered your question. 4 LORD JUSTICE LEVESON: No, my question is really aimed at 5 the impact that I can have on other press activity in 6 relation to somebody with an international reputation 7 simply by doing what I can do in this country. 8 A. There's obviously nothing you can do outside this 9 country. 10 LORD JUSTICE LEVESON: I agree. 11 A. But if you made our press behave more professionally, 12 then stories that they write would not be so damaging 13 when they spread around the Internet. 14 LORD JUSTICE LEVESON: I see that. Then the question arises 15 where stories emanate from. One of the stories you 16 talked about actually I think you said emanated 17 initially in America, but whether it went to America 18 from here or where, I don't know. 19 A. That is always difficult to know. 20 LORD JUSTICE LEVESON: Yes. I'm just trying to grapple with 21 the whole problem; that's all. I'm certainly not 22 focusing on individual stories. 23 A. Yes. 24 LORD JUSTICE LEVESON: For the reasons that you understand. 25 A. Yes, yes.</p> <p style="text-align: center;">Page 161</p>	<p>1 Q. It's not their function to advise you in relation to 2 your dealings with the press? 3 A. It is in relation to my dealings with the press in 4 America when a film comes out and a little bit around 5 the world, although they try to be experts on what TV 6 show is a good one to do if you're on a world tour in 7 Russia, but obviously they're not massive experts on 8 that, and to be absolutely honest, they throw up their 9 hands when it comes to Britain. They say, "We have no 10 advice. It's uncontrollable." 11 Q. Yes, okay. We did see, I think, in relation to that 12 little piece in the Sun about your health, that your 13 publicist declined to comment. 14 A. They called my assistant -- 15 Q. Just wait for the question, please. 16 A. Yes. 17 Q. It looks as if, rightly or wrongly, someone at the Sun 18 telephoned your assistant or your publicist for comment 19 and quite rightly got no comment. Is that a fair 20 inference? 21 A. Yes, they will either have phoned the publicist in 22 America, which is unlikely, or they phoned my assistant 23 in London -- 24 MR JAY: Right. 25 A. -- who is an executive assistant. She's fantastic, but</p> <p style="text-align: center;">Page 163</p>
<p>1 MR JAY: Okay, Mr Grant, we'll move off the Sun in your 2 second witness statement. I'm going to cover now some 3 matters of opinion to try and look at the bigger 4 picture. 5 Before I do that, can I ask you some questions about 6 publicity and publicists? 7 A. Yes. 8 Q. You've referred now at least once to a publicist you 9 have in the US. Is that right? 10 A. Yeah. 11 Q. How many publicists do you have around the world? 12 A. Well, I have one. They're in New York, and I only use 13 them sporadically when a film is coming out, and they're 14 not for -- they're like anti-publicists. They're for 15 not getting publicity but for fending off -- a studio 16 may have a film coming out. The studio -- say Warner 17 Brothers -- will be desperate for you to do everything, 18 particularly in America, and the job of my publicist -- 19 I pay them not very much money -- is to say, "No, he's 20 not doing that, he's not doing that. He might do that 21 because that's a classy one." That's all they're there 22 for. Between films I don't pay them, they go on hiatus 23 and they knew nothing about this until they kept getting 24 calls from British tabloids saying, "We've head he's had 25 a baby."</p> <p style="text-align: center;">Page 162</p>	<p>1 she's not a publicist, but they may have given her that 2 label. 3 Q. Okay, I understand. So it's a standard PA? 4 A. Right. 5 Q. It's not really part of her role to advise you in 6 relation to your dealings with the press? 7 A. Not at all. In terms of the British press, I have no 8 advice except myself. 9 Q. Right. So if, for example, you give an interview to the 10 press, you consult your own advice and no one else's; is 11 that correct? 12 A. You're talking about the British press? 13 Q. Yes. 14 A. Well, in 17 years I've only given two interviews to the 15 British press. The rest have all been either bought in 16 from abroad or patch and pasted together or invented, 17 and so the question doesn't really arise. 18 Q. Yes. You gave one interview, I think, in 2002, which 19 has been drawn to my attention. So that you have your 20 bearings, it relates to about the time you were doing 21 a film with Sandra Bullock. Do you remember that? 22 A. Yes. 23 Q. I can't remember the name of the film now. 24 A. "Two Weeks' Notice"? 25 Q. Yes. The question you got was:</p> <p style="text-align: center;">Page 164</p>

<p>1 "How frustrating is it for you that people are more 2 interested in your love life than your films?" 3 And your answer, probably quite accurately, was: 4 "I do get frustrated but I do understand where 5 the -- where the interest comes from." 6 A. Mm-hm. 7 Q. It's pretty obvious, isn't it, where the interest comes 8 from? 9 A. Yeah, of course people are interested in people's love 10 lives. We all have that natural curiosity or prurience. 11 It doesn't mean to at that say that you can obtain that 12 information illegally. 13 Q. No, of course not. Yes. Then you continue: 14 "When I think about actors I know, I'd much rather 15 hear about who they're shagging than what film they're 16 doing next." 17 A. That remains true. But again, as I say, it doesn't mean 18 to say that information should be obtained illegally. 19 Q. No, fair point, and then you go on probably into an area 20 which it's unnecessary for me to -- 21 A. I know that it was given -- that quote, I think, comes 22 from a press conference with a thing called the 23 Hollywood Foreign Press Association, the people who 24 control the Golden Globes. It's always a very 25 light-hearted occasion and always try to give</p> <p style="text-align: center;">Page 165</p>	<p>1 it? Is it fair and right for them to do that, in your 2 view? 3 A. I think not. I've always thought if they've obtained 4 the information illegally or unethically, why should 5 I help them with their story? After all, their motive 6 in the first place was money, profit. It's almost never 7 public interest. It's profit. Someone's making money 8 out of this so why should I help them make money out of 9 invading my privacy? 10 Q. Probably it's my fault for not asking the question not 11 with ultimate precision. We see it a little bit in 12 microcosm in relation to the recent history, that for 13 whatever reason the Daily Mail don't publish. You've 14 made your point in relation to how the Daily Mail, you 15 think, obtained relevant information, but they didn't 16 act on it. Eventually it comes out in the United States 17 of America. We don't know on what basis they obtained 18 the information for their story, but once it's out in 19 the public domain, it's now in the public domain, and so 20 everyone else -- by which I mean other organs of the 21 press -- can now comment, can't they, on the story which 22 is now, by definition, in the public domain? 23 A. Yes. 24 Q. Would you agree with that? 25 A. That's right, and from experience, I know that not only</p> <p style="text-align: center;">Page 167</p>
<p>1 light-hearted answers and as I say in my main statement, 2 prior to about a year ago, if the subject of the British 3 tabloids came up in an interview, I took the line that 4 just about everyone else in the country who's ever been 5 in the crosshairs of the British tabloids will take, 6 which is to give either a neutral answer or a flippant 7 answer -- 8 Q. Yes. 9 A. -- because to speak out and criticise is to invite 10 a terrible press storm on your head and hatchet jobs, 11 et cetera. 12 Q. Yes. 13 A. So I think the answer that you're referring to there, 14 the Hollywood Foreign presentation, was one of those 15 flippant answers. 16 Q. Yes. I assumed it was, Mr Grant. That's why I wasn't 17 going to read it out. 18 You quite rightly say that whatever the interest of 19 the public may be in your private life, that cannot 20 justify the use of illegal or probably, you would add, 21 unethical news-gathering methods. 22 A. Right. 23 Q. Is that correct? What happens, though, if information 24 has eventually entered the public domain and then once 25 it's in the public domain, the press want to comment on</p> <p style="text-align: center;">Page 166</p>	<p>1 will they comment but they'll write it as news with 2 a little embellishments. For instance, they will say 3 "a friend tells us", or "an insider tells us", or 4 "an associate tells us". And those are usually 5 invented. They almost never exist. So they'll create 6 a whole new story based on the original story which 7 could have a very wrong or twisted slant to it. Hence 8 my decision to put out a statement to try and give the 9 real facts. 10 Q. You've added a sort of extra dimension, quite rightly, 11 that we've got a story which is now in the public 12 domain. Okay? It's unclear, particularly if it's in 13 the States, how the American magazine or newspaper 14 obtained the story. We simply don't know. 15 A. Yeah. 16 Q. Once it's in the public domain there, it's in the public 17 domain across the world and now the press here comment 18 upon it. Your point is: well, what they're certainly 19 not allowed to do is embellish the story, add bits of 20 news which are untrue. Okay, let's agree with that. 21 A. Mm-hm. 22 Q. But if they stop short of doing that and they don't 23 embellish, but all they do is comment on you, maybe in 24 a way you don't like -- 25 A. No, that's not --</p> <p style="text-align: center;">Page 168</p>

<p>1 Q. -- do you have a problem with that?</p> <p>2 A. No, I don't mind -- listen, I'm ready for comments.</p> <p>3 Believe me, I am very ready for that. I've experienced</p> <p>4 a lot of it. As I said earlier, I just do slightly</p> <p>5 gnash my teeth when those hatchet jobs are based on</p> <p>6 wrong facts or lazy journalism, like the 21-year-old</p> <p>7 girlfriend or like: "It was cruel of him to only visit</p> <p>8 for half an hour" when in fact I was being kind.</p> <p>9 I mean, I was trying to protect the mother of my child.</p> <p>10 That's annoying. But of course everyone's entitled to</p> <p>11 their opinion.</p> <p>12 Q. Yes. Obviously the Inquiry needs to consider this issue</p> <p>13 of embellishment which is incorrect and ways that that</p> <p>14 can be corrected or addressed. Of course one way it can</p> <p>15 be corrected is that you can bring proceedings of</p> <p>16 defamation.</p> <p>17 A. Yeah, if it's -- if my lawyer thinks it's defamatory,</p> <p>18 yeah.</p> <p>19 Q. What about complaining to the PCC in relation to recent</p> <p>20 events? Have you thought about doing that?</p> <p>21 A. My experience, as you saw way back in 1996, was not</p> <p>22 a positive one with the PCC. They took a year to decide</p> <p>23 that it was a wrongful thing for a hospital to give out</p> <p>24 my medical records. So I didn't have massive faith in</p> <p>25 them since then, and in the case of recent events, my</p> <p style="text-align: center;">Page 169</p>	<p>1 market for those pictures. I think, you know, there</p> <p>2 would be no rogue paparazzi if there wasn't big national</p> <p>3 papers paying for their pictures, and so I'm not quite</p> <p>4 sure which end of that you attack first.</p> <p>5 LORD JUSTICE LEVESON: Well, the question then arises, which</p> <p>6 goes back to the question I was asking just a moment</p> <p>7 ago, about international interest, because one could</p> <p>8 say -- one could do something about paying for pictures</p> <p>9 in this country but one wouldn't be able to regulate the</p> <p>10 sale of pictures abroad.</p> <p>11 A. That is true. That is true. But I think, if I'm right,</p> <p>12 in France there's various laws -- for instance, you</p> <p>13 can't take someone's picture in a public place, and that</p> <p>14 does give a much more humane, civilised existence to</p> <p>15 people in the public eye despite the fact that</p> <p>16 presumably those pictures could come back in from</p> <p>17 abroad. Is that what you were saying?</p> <p>18 LORD JUSTICE LEVESON: Well, there are various problems.</p> <p>19 One can think about the domestic market, which is what</p> <p>20 I'm mainly, obviously, focusing on, but I have in you</p> <p>21 somebody who has the international perspective because</p> <p>22 of the interest that's been shown in you</p> <p>23 internationally.</p> <p>24 A. Yes, yes.</p> <p>25 LORD JUSTICE LEVESON: I'm just wondering how that plays</p> <p style="text-align: center;">Page 171</p>
<p>1 lawyer did -- before he took out the injunction, while</p> <p>2 we were trying to work out a strategy to get rid of all</p> <p>3 these paparazzi and reporters who were besieging the</p> <p>4 mother of my child's house and making her life miserable</p> <p>5 and following her -- he did send a warning letter to the</p> <p>6 newspapers and he sent it via the PCC, and there was</p> <p>7 a 10 per cent dip in activity outside the house for</p> <p>8 maybe 12 hours, and then it was back to normal. So my</p> <p>9 verdict on their contribution to this was that they were</p> <p>10 ineffectual.</p> <p>11 Q. Okay. Another factor in your case, which I suppose adds</p> <p>12 to the --</p> <p>13 LORD JUSTICE LEVESON: Sorry, Mr Jay, let me just consider</p> <p>14 that for a moment.</p> <p>15 The PCC at the moment is monitoring or provides</p> <p>16 a service to certain of the press but that won't ever</p> <p>17 touch paparazzi.</p> <p>18 A. The freelance paparazzi?</p> <p>19 LORD JUSTICE LEVESON: The freelance paparazzi.</p> <p>20 A. Right.</p> <p>21 LORD JUSTICE LEVESON: So one of the things that one would</p> <p>22 have to think about is whether one could devise a system</p> <p>23 that bites irrespective of whether you're employed by</p> <p>24 a newspaper.</p> <p>25 A. Yes. You're probably right. Or to somehow kill the</p> <p style="text-align: center;">Page 170</p>	<p>1 into the picture.</p> <p>2 A. I don't know the answer to your question, I'm afraid, in</p> <p>3 terms of international. All I can tell you is that not</p> <p>4 just in my opinion, but in the opinion of other people</p> <p>5 who are quite well-known around the world and who, for</p> <p>6 instance, sometimes do tours, publicity tours for a film</p> <p>7 or whatever, they're unanimous in saying that by far and</p> <p>8 away the worst territory to do any kind of publicity in</p> <p>9 is this one.</p> <p>10 LORD JUSTICE LEVESON: It may be that's right and maybe</p> <p>11 therefore I just shouldn't worry about anywhere else.</p> <p>12 I'm just looking for your assistance; that's all.</p> <p>13 A. I think that's right. There are certain pockets of</p> <p>14 quite toxic yellow journalism around the rest of the</p> <p>15 world, but on the whole, it's still done with a certain</p> <p>16 elegance, an elegance that we've lost in the last 30</p> <p>17 years in this country.</p> <p>18 LORD JUSTICE LEVESON: Thank you.</p> <p>19 MR JAY: Quite a lot of what you have said is directed to</p> <p>20 the Daily Mail. Can I ask you this, though: whether in</p> <p>21 the context of the Amanda Platell article or more</p> <p>22 generally, if one strips away the factual inaccuracies,</p> <p>23 particularly in relation to the German woman -- and</p> <p>24 you've clearly made your point about that -- do you have</p> <p>25 any other broad objection to her piece, notwithstanding</p> <p style="text-align: center;">Page 172</p>

<p>1 that it is true to say it's very critical of you? On</p> <p>2 a human level, of course the answer is: "Of course I do,</p> <p>3 I don't like to read that sort of stuff."</p> <p>4 A. Yeah.</p> <p>5 Q. But I'm asking you to think more abstractly in terms of</p> <p>6 where the boundaries should be drawn in terms of</p> <p>7 regulating these pieces. Because after all, all she is</p> <p>8 doing is exercising her right to comment.</p> <p>9 A. Right. Well, that's fine.</p> <p>10 Q. That's fine, is it?</p> <p>11 A. Yeah, it's fine. It's sad that it's based on so much</p> <p>12 lazy reporting, you know.</p> <p>13 Q. Okay.</p> <p>14 A. The visit to the baby and all that kind of -- didn't</p> <p>15 know the facts, and it is possible that as many of my</p> <p>16 friends, professors of journalism who have rang me up</p> <p>17 and said it's clearly a deliberate hatchet job because</p> <p>18 you're speaking against the tabloid press -- that may be</p> <p>19 true, but I was reluctant even to talk about it in this</p> <p>20 statement because I've always felt that comment is</p> <p>21 comment and it's not really cool to comment on it. But</p> <p>22 I was persuaded that because of this theory that it</p> <p>23 might be a stick to beat me with because I'm doing this,</p> <p>24 that maybe it was relevant.</p> <p>25 Q. Yes. I've put in the equation three other articles</p> <p style="text-align: center;">Page 173</p>	<p>1 I think we'd probably all agree with, that it isn't only</p> <p>2 celebrities and politicians who suffer at the hands of</p> <p>3 popular papers. You've given us quite a few examples</p> <p>4 there, and indeed some of the examples you've given are</p> <p>5 human beings who will testify before this Inquiry very</p> <p>6 shortly.</p> <p>7 A. Yeah, I talk about particularly vulnerable people who</p> <p>8 have been victims of trauma, such as the Dowlers who we</p> <p>9 saw earlier today, or the victims of the London bombings</p> <p>10 or families of soldiers killed in Afghanistan. Then</p> <p>11 I talk about collateral damage.</p> <p>12 Q. Yes.</p> <p>13 A. Where, say, my phone is hacked but so is my assistant's,</p> <p>14 my -- you know, my brother's or my father's, whatever it</p> <p>15 might be. Innocent people having their privacy invaded</p> <p>16 just because they're in the -- it's collateral damage.</p> <p>17 And then I talk about innocent people who have been</p> <p>18 monstered by the press, like Christopher Jefferies or</p> <p>19 Robert Murat or Madeleine McCann, who the press have</p> <p>20 implied very heavily are guilty of heinous crimes when</p> <p>21 in fact they're entirely innocent.</p> <p>22 LORD JUSTICE LEVESON: You didn't mean Madeleine; you mean</p> <p>23 her parents?</p> <p>24 A. I'm sorry, yes.</p> <p>25 LORD JUSTICE LEVESON: I understand, and I only corrected</p> <p style="text-align: center;">Page 175</p>
<p>1 which are admittedly not couched in quite the same</p> <p>2 language but which make the same sort of critical point</p> <p>3 about you.</p> <p>4 A. Mm-hm.</p> <p>5 Q. So we're weighing up quite a lot of material of</p> <p>6 a similar nature. Maybe you hadn't seen all of those.</p> <p>7 A. I haven't seen all of them, thank God, but I'm sure, as</p> <p>8 I said earlier -- you keep coming back to this point --</p> <p>9 they are based largely on a lot of misreporting.</p> <p>10 Q. Yes.</p> <p>11 A. But for the parts that are not based on misreporting, it</p> <p>12 is perfectly fine to hate me. I have become very</p> <p>13 accustomed to that. It's been extremely fashionable for</p> <p>14 a long time and that is what I expect in this country.</p> <p>15 Q. Okay. Mr Grant, we probably have another half an hour.</p> <p>16 I'm going to give you the opportunity now, as I have</p> <p>17 given previous witnesses, to, as it were, elaborate your</p> <p>18 opinion. Your opinion is contained mainly in your first</p> <p>19 statement, beginning at paragraph 39 and 40.</p> <p>20 A. Yes. This is where I go through my ten myths.</p> <p>21 Q. Your ten myths. What I'd like to do with you is make</p> <p>22 sure that we've got your points, okay, and that we're</p> <p>23 not skating over them.</p> <p>24 A. Yes.</p> <p>25 Q. And that we have them in mind. Your first point is one</p> <p style="text-align: center;">Page 174</p>	<p>1 not to get at you but because I don't want anybody to</p> <p>2 think that you said that.</p> <p>3 A. Yes, well, I did and I was wrong.</p> <p>4 MR JAY: Then you deal, myth two, with the issue of whether</p> <p>5 egregious abuses of privacy were confined to the</p> <p>6 News of the World and you express your opinion about</p> <p>7 that. Of course, here you're hitting one of the central</p> <p>8 points of this Inquiry. This is what we're trying to</p> <p>9 investigate. We're looking at all the evidence and</p> <p>10 we've heard your position on all of that.</p> <p>11 A. Yes.</p> <p>12 Q. And you've given us direct evidence in relation to</p> <p>13 Mr McMullen and obviously everything he says will be</p> <p>14 taken fully into account.</p> <p>15 A. Yes, and I'd just like to echo what I heard from one of</p> <p>16 the earlier witnesses, that given the</p> <p>17 cross-fertilisation of journalists in the tabloid world,</p> <p>18 it's highly unlikely that they only practise dark arts</p> <p>19 for one title. They were always swapping titles and</p> <p>20 I can't believe that they didn't practise those arts in</p> <p>21 other places as well.</p> <p>22 Q. Your third myth is the risking throwing the baby out</p> <p>23 with the bath water point. Could you elaborate on that</p> <p>24 one, please, in your own words? What are you getting at</p> <p>25 there?</p> <p style="text-align: center;">Page 176</p>

<p>1 A. Well, it is a commonly voiced opinion that you cannot in 2 any way regulate or improve or legislate or -- for the 3 worst practices of the worst of journalists in this 4 country without damaging free speech, without muzzling 5 proper journalism, and the metaphor that's endlessly 6 bandied about is: be careful of throwing the baby out 7 with the bath water. I've always said that I don't 8 think it is that difficult to tell the difference 9 between what is bath water and what is a baby. To most 10 people, it's bloody obvious, and that I have always 11 thought that you just simply take the baby -- which in 12 this case is excellent journalism; we're lucky to have 13 some of the best in the world in this country -- out of 14 the bath and let the bath water run out. 15 Everyone says it's a very difficult distinction to 16 make, what's good journalism and what's not, and 17 although I don't say it's black and white, there's 18 a grey area, I think it's a lot less grey than people 19 make it out to be. 20 Q. Thank you. Your fifth myth is a related point, which is 21 that over-regulation will lead to tyranny. Can I ask 22 you, please, though about what your positive proposals 23 would be in relation to press regulation? 24 LORD JUSTICE LEVESON: It's not compulsory for you -- 25 A. Sorry, say that again? You're actually on myth four, Page 177</p>	<p>1 A. You are, yes. 2 Q. But can you help us, please, with some positive 3 suggestions? It's an invitation. You don't have to 4 take it up. 5 A. There are forms of -- if you take at one end of the 6 scale state regulation, and you take at the other end of 7 the scale no -- well, self-regulation, there are various 8 gradations in between, including what some might call 9 co-regulation, which would be regulation by -- say 10 a panel that both be comprised of partly journalists but 11 partly also non-journalists, experts in the field, 12 professors of journalism, who would draw up a Code of 13 Ethics and would apply it with proper sanctions, 14 meaningful sanctions, either financial or in terms of 15 apologies, but which would need -- and this is where it 16 gets interesting. To have any teeth and to be 17 meaningful, it would have to have, right at the back, as 18 a backstop, some kind of regulation. Otherwise it would 19 be easy, for instance, for the Express Group, as they 20 have done now, to walk-away from the PCC, and say, 21 "We're not having any of that", or you could set up 22 a new regulator who would find some appalling abuse by 23 a paper and say, "You're fined £200,000", and they say, 24 "We're not paying." Somewhere there has to be a little 25 bit of statute right at the back to make it more Page 179</p>
<p>1 I think: 2 "Any attempt to regulate the press means we're 3 heading for Zimbabwe." 4 Which is another of these arguments like "don't 5 throw the baby out with the bath water" that we often 6 hear, and I simply make the point that (a) that is way 7 too simplistic and (b) very often insincere. It's very 8 often used by tabloid newspapers to protect their 9 lucrative business model, which is, after all, almost no 10 journalism now -- it's mainly the appropriation, usually 11 through illegal means, of British citizens' fundamental 12 rights of privacy to sell them for profit -- and that 13 this argument that you can't in any way deal with that 14 without us living in a state like Zimbabwe is not only 15 absurd but it's also highly convenient for them. There 16 are, of course, many gradations of regulation between 17 Zimbabwe and between being the total free-for-all that 18 we have now. 19 Q. Yes. I think this Inquiry, if you're able to assist to 20 this extent, is concerned with the gradations 21 particularly in the middle of this spectrum. No one is 22 suggesting, I hope, anything close to a form of 23 regulation which will lead to Zimbabwe or tyranny. 24 We're concerned with something much less extensive than 25 that. Page 178</p>	<p>1 meaningful. But there are people much more expert on 2 this than me, and I'm sure you'll be calling them. 3 LORD JUSTICE LEVESON: You're absolutely right that we'll be 4 calling a range of people with ideas, but certainly from 5 my perspective it's abundantly clear this is a topic 6 that you've thought about carefully. You've obviously 7 suffered as you've described and had the experiences 8 you've described, whether justifiably or not, and 9 therefore I wanted to make sure that you had the 10 opportunity to say anything you wanted to say on the 11 subject. 12 A. Well, I mean I come to that sort of at the end of my 13 statement, yes, that is when I say that I think there 14 are midways that could make everyone happy. 15 The press is, after all, the only industry in this 16 country that has a profound influence over other people, 17 over our citizens, that is regulated only by itself. 18 There's no other industry like that, whether it's 19 medicine or advertising, it's all regulated, and no one 20 calls for those regulators to be tougher than our press, 21 and yet when it comes to themselves: no regulation, 22 "we'll do it ourselves"; which, although a lovely idea, 23 which would be fantastic if it had worked, has 24 absolutely been shown not to have worked for the last 20 25 or 30 years. You know, we've had so many last chance Page 180</p>

<p>1 saloons and it's been a failure, and this is the big 2 opportunity now, this Inquiry, in my opinion. 3 MR JAY: Thank you. The fifth myth: current privacy law 4 under the Human Rights Act muzzles the press. You make 5 the point a breach of privacy case has never been taken 6 against the Guardian, to your knowledge. 7 A. Yes. There's a lot of squealing, again from the tabloid 8 press, about these injunctions and so on and they say it 9 muzzles the press and it has a chilling effect, 10 et cetera, and I just make the point, well, first of 11 all, no one's taken a privacy case against the Guardian; 12 and secondly, if there's a public interest defence, why 13 in the case of many -- the vast majority of these 14 injunction cases, does the newspaper in question not 15 even bother to turn up to defend their piece on the 16 grounds of public interest? The judge sits there and 17 says, "Well, where's the paper?" and the paper doesn't 18 turn up, and I ask: is that because there is no public 19 interest defence? And I think we all know the answer to 20 that. 21 And I make the point that ultimately it all comes 22 down to public interest and who is better to decide 23 whether a piece of journalism is in the public interest 24 or not? Would that be a judge or would it be the 25 tabloid editor who stands to profit commercially from</p> <p style="text-align: center;">Page 181</p>	<p>1 able to go straight to the regulator and skip the whole 2 court process, especially if you're not a person of 3 means, it's a wonderful thing to be able to go to, and 4 I think that would be the most wonderful thing to come 5 out of this Inquiry, if there was a proper regulator 6 that gave access to justice of that kind without having 7 to go through the courts. But there will always be 8 cases when people will have to go through the courts, 9 and when they do, it is scandalous, in my opinion, that 10 this will now be -- if what is going through Parliament 11 now on the back of the Jackson Report happens, people 12 without great means will be excluded from justice. 13 If you look at the Dowlers, used a CFA to -- if 14 their phone hacking case against the News of the World. 15 They would not have been able to make that case, they 16 would not have been able to prosecute that case without 17 a CFA. Chris Jefferies, the man wrongly accused of that 18 murder down in Bristol, wrongly maligned by the press, 19 had to use a CFA to get justice. Sara Payne, same 20 thing. 21 Without CFAs, those people have no justice, and this 22 whole campaign to restrict the use of CFAs has been very 23 heavily pushed by the tabloid press, and the government, 24 in its infinite obedience to the tabloid press, has 25 simply said, "Yes, fine."</p> <p style="text-align: center;">Page 183</p>
<p>1 the piece? To me, it's the judge, and I would argue 2 that most of the judgments made in these injunction 3 cases have been right, and nor versus they been biased. 4 We saw that in the Rio Ferdinand case recently. The 5 judges are quite ready to rule the other way, whether 6 rightly or wrongly, wrongly in my opinion in that case, 7 but they're quite ready to go either way, and that all 8 this fuss from at least the tabloid end of the British 9 press about these injunctions is bogus and convenient. 10 Q. Thank you. This leads into the sixth myth, which is 11 a related point -- 12 A. Yes, I just mentioned that. 13 Q. -- (overspeaking) there you say they don't. You've 14 expressed a view about the Rio Ferdinand case and we'll 15 see what happens to that. Permission to appeal has been 16 refused by the single lord justice, but we understand 17 the application is being renewed. 18 Myth number 7: privacy can only ever be a rich man's 19 toy. That depends a bit on the survival of conditional 20 fee agreements, doesn't it? 21 A. I think it depends on that and on establishing a proper 22 regulator. 23 Q. Yes. 24 A. If you establish a meaningful regulator, if you have 25 your privacy abused or you're libelled, you should be</p> <p style="text-align: center;">Page 182</p>	<p>1 Q. Okay, thank you. That's very clear on that point, 2 Mr Grant. The eighth point: most sex exposes (exposes, 3 I think that should be) carry a public interest defence. 4 I think you've already made your position clear on that, 5 but -- 6 A. I -- I. 7 Q. -- please say whatever you wish to say in addition. 8 A. I say that there are certainly cases where there is 9 a public interest defence. If you're a politician who 10 campaigns on a family values platform, then it's 11 definitely a public interest to have his -- and he's 12 being -- you know, having an extramarital affair or he 13 likes to dress up as a nun and sleep with prostitutes, 14 we need to know about it because he's a hypocrite. But 15 I think that the vast majority of these exposes of 16 people's sex life are not in the public interest and the 17 public interest defences as offered by tabloid 18 newspapers are very flimsy at best. They'll say, oh 19 well, you know, Ryan Giggs trades on his reputation, but 20 he doesn't, he trades -- to me, quite clearly, on the 21 fact that he's a brilliant footballer and I don't 22 believe that anyone is buying a pair of Ryan Giggs 23 football boots because they think that he's a great 24 family man. I think they're buying it because he's won 25 lots of trophies for Manchester United.</p> <p style="text-align: center;">Page 184</p>

<p>1 Funnily enough, I read in the Independent this</p> <p>2 morning that apparently I do the same thing, I trade on</p> <p>3 my good name, and therefore there's a public interest</p> <p>4 defence in going into my private life, but I wasn't</p> <p>5 aware I traded on my good name. I've never had a good</p> <p>6 name. And it's made absolutely no difference at all.</p> <p>7 I'm the man who was arrested with a prostitute and the</p> <p>8 film still made tons of money. It doesn't -- it doesn't</p> <p>9 matter.</p> <p>10 Q. Okay. I think that's very clear, Mr Grant.</p> <p>11 A. Okay.</p> <p>12 Q. Myth number nine: this is the sort of development of the</p> <p>13 Faustian pact idea, isn't it?</p> <p>14 A. Yes, it's another very common defence of what I would</p> <p>15 call the privacy invasion industry; some people would</p> <p>16 call it at tabloid press. What I say is the myth is</p> <p>17 that people like me want to be in the papers, and need</p> <p>18 them, and therefore our objections to privacy intrusions</p> <p>19 are hypocritical.</p> <p>20 Then I go on to, at some length, explain how that is</p> <p>21 a myth that in my business -- for instance, what I need</p> <p>22 is not to be in the Sun or the Daily Mail or the Mirror;</p> <p>23 it's to make enjoyable films. That is 85 per cent of</p> <p>24 success. About 10 per cent of success is that the film</p> <p>25 is then well marketed. You know, if someone cuts a good</p> <p style="text-align: center;">Page 185</p>	<p>1 success of films and they create stars, is entirely</p> <p>2 spurious. It's either their mad arrogance, because they</p> <p>3 live in this funny cocoon of self-importance, or it's</p> <p>4 highly convenient because it gives them a chance to the</p> <p>5 say, "If anyone criticises us, it's hypocritical."</p> <p>6 Q. Particularly if one goes back towards the start of your</p> <p>7 successful part of your career in the early 1990s,</p> <p>8 didn't it help your career that you were quite</p> <p>9 constantly in the public eye?</p> <p>10 A. No.</p> <p>11 Q. Didn't that make you more attractive to future</p> <p>12 filmmakers, possibly?</p> <p>13 A. No. That is another --</p> <p>14 Q. Why do you say that?</p> <p>15 A. I would argue that's another myth put about by tabloids.</p> <p>16 What made me attractive to other the filmmakers was that</p> <p>17 "Four Weddings and a Funeral" made gazillions at the box</p> <p>18 office. That's all they care about. After all, a</p> <p>19 couple of films later, as I say, I was arrested with</p> <p>20 a prostitute, got a lot of -- you couldn't call it</p> <p>21 positive press, and I was still very hireable because the</p> <p>22 films made money. That's all that, in terms of a</p> <p>23 career, that the studios cared about, and audiences only</p> <p>24 care about whether the film is entertaining or not.</p> <p>25 I could show you examples of films that is have</p> <p style="text-align: center;">Page 187</p>
<p>1 trailer or a good TV spot.</p> <p>2 Then right at the end, about 5 per cent of the</p> <p>3 success might be that just before the film comes out you</p> <p>4 bang the drum a bit and do a bit of publicity. So it's</p> <p>5 quite minor and you are under an obligation to do it,</p> <p>6 not just -- sometimes it's contractual, but more often</p> <p>7 it's just a moral obligation. Someone put up a lot of</p> <p>8 money for the film, hundreds of people, sometimes</p> <p>9 thousands, have worked on this thing for over a year.</p> <p>10 If you didn't do a little bit of publicity, you'd be</p> <p>11 about monster, you'd be a bit of a diva, people would</p> <p>12 hate you, so you have to do a little bit. But it's only</p> <p>13 5 per cent of what contributes to the success of a film,</p> <p>14 and within that 5 per cent, how much of that is tabloid</p> <p>15 newspapers or even newspapers at all? Very little.</p> <p>16 What everyone does now is they favour broadcast media.</p> <p>17 You reach many more people faster, you can't be</p> <p>18 misquoted, so everyone is doing television and radio.</p> <p>19 If tabloids were so important to the success of</p> <p>20 a film or the success of an actor or the success of</p> <p>21 a singer, why is it that, for instance, none of us in</p> <p>22 the large ensemble cast of "Love Actually" talked to any</p> <p>23 tabloid newspaper at all when the film was released and</p> <p>24 the film was still gigantic. The theory put about by</p> <p>25 the tabloid papers, that they are responsible for the</p> <p style="text-align: center;">Page 186</p>	<p>1 wall-to-wall tabloid coverage before they come out and</p> <p>2 still die at the box office because they're not</p> <p>3 entertaining. It's a big myth.</p> <p>4 I personally have actually argued with my lawyer</p> <p>5 over the years when making settlements, libel or</p> <p>6 whatever, with papers, saying, "Please, forget money,</p> <p>7 forget an apology, just make them give an undertaking</p> <p>8 never to mention my name again", and I could bring you</p> <p>9 a list of hundreds of people in the public eye in this</p> <p>10 country who would happily sign up for that. It's such</p> <p>11 a myth to say oh, we want it so badly, we're so vain,</p> <p>12 we're dying to be in the papers. It's the last thing</p> <p>13 anybody wants, to be in a British tabloid paper,</p> <p>14 unnecessary, so long as the work you were doing at that</p> <p>15 moment is okay.</p> <p>16 Q. You deal with, I suppose, one aspect or the last aspect</p> <p>17 of the Faustian pact point in paragraphs 81 to 82 of</p> <p>18 your statement.</p> <p>19 A. Yeah.</p> <p>20 Q. What is the consideration, if one uses a legal term, if</p> <p>21 you do an interview with a newspaper or magazine?</p> <p>22 You're saying here, well, it doesn't give a lifelong</p> <p>23 licence to publish whatever you like about the subject</p> <p>24 matter of the interview?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 188</p>

47 (Pages 185 to 188)

<p>1 Q. That, of course, must be right as a matter of common 2 sense, but it surely gives some licence to comment, 3 possibly unfavourably, on the subject matter of the 4 interview? 5 A. Yeah, of course, that would be fine. Absolutely fine. 6 But I'm talking here about intrusion, and I have heard 7 the defence quite frequently from tabloid papers: "Oh, 8 well, you know, if you have ever talked about your 9 private life, then you have no defence, you have no 10 right to an expectation of privacy", which I think is 11 absurd. Because anyone -- I mean, as I told you 12 earlier, I think I've only done two interviews ever with 13 the British press, but when anyone does do an interview, 14 it is, after all, a bargain. The press of that paper 15 gets a boost in sales, they hope, and the person who's 16 giving the interview gets a bit of noise about their 17 forthcoming project. And like any barter, when it's 18 over, it's over. If I sell you a pint of milk for 50p, 19 I would not expect you to come to me forever afterwards, 20 saying, "You slut, you sold me milk once. I can now 21 help myself to your milk forever." I would think you 22 were mad. 23 Q. I think your point is more specifically that having 24 conducted this little contract, it certainly doesn't 25 authorise the press subsequently to investigate you in Page 189</p>	<p>1 paragraph 88 of your statement? 2 A. Yes. We sort of went over them. I give you -- well, 3 paragraph 86, in a nutshell, it seems clear to me that 4 it should be unacceptable and illegal to deprive 5 a person of their fundamental human right to privacy 6 unless there is a real public interest defence. It's 7 not rocket science and the ways I would protect it are 8 (1) I would resist the clamour of the privacy-stealing 9 industry to close down our privacy law as it's emerged 10 through common law, through the Human Rights Act, and 11 I would disband the PCC and create a proper regulator 12 with teeth, which would not only protect people from 13 abuses of privacy or libel as a first port of call, but 14 it would also be there to protect good journalism. You 15 know, this is the other side of all this. I'm, for 16 instance, keen on libel reform. I'm keen to see good 17 journalism protected as much as one possibly can. I'm 18 the reverse of a muzzler. But I personally feel that 19 the licence that the tabloid press has had to steal 20 British citizens' privacy for their commercial profit -- 21 very often vulnerable British citizens -- is a scandal 22 that weak governments for too long have allowed to pass. 23 MR JAY: Mr Grant, is there anything else you wish to tell 24 the Inquiry? We've covered the ground -- 25 A. No. I mean, it's a strange form of interview, in Page 191</p>
<p>1 an unlawful or unethical way or intrude into your 2 privacy? 3 A. That is what I'm saying. Yes, exactly that. I do 4 believe that enshrined in our bill of rights, you know, 5 article 8 is a person's basic expectation of a right to 6 privacy, and I don't think that you should have to give 7 that up just because you once gave an interview about 8 a film to the Daily Mirror. 9 Q. Yes. Then the tenth myth is the lovable rogue point. 10 A. Yes. 11 Q. Which you say they clearly are not. 12 A. Well, you know, you see them glamourising themselves as, 13 you know: "We might be a bit naughty but we get the 14 story", but when the story has been obtained by hacking 15 the phone of a murdered school girl or of the family of 16 a soldier killed in Afghanistan, I don't find that 17 lovable and naughty. I found that cowardly and bullying 18 and shocking, and most shocking is that this has been 19 allowed to go on for so long with no one putting their 20 hand up and saying, "Stop." Not the police, because 21 they're intimidated, not our MPs, because they've been 22 intimidated, and not our government, because they've 23 been intimidated. 24 Q. Your positive proposals for the future you've touched on 25 already and they're encapsulated, are they not, in Page 190</p>	<p>1 the sense that I wish I'd been able to read my two 2 statements out loud first, because, you know, we haven't 3 really -- it's all been me defending positions in them 4 without anyone knowing what the statement actually says. 5 LORD JUSTICE LEVESON: I think you'll find the statements 6 will be available. 7 A. Yeah, well, I hope people read it. 8 MR JAY: They will, Mr Grant, and also all the points, I'd 9 like to think, that you wanted to bring out, you have 10 brought out, but if you feel there's a point that -- 11 A. There is one final point. 12 Q. Okay, please bring it out. 13 A. Because I'm tired, I wouldn't mind reading it, actually, 14 seeing as it's in my statement. It's my conclusion. 15 I just say: 16 "I don't want to see the end of popular print 17 journalism. I wouldn't want a country that was fawning 18 to power or success. I like and admire and would always 19 want to protect the British instinct to be sceptical, 20 irreverent, difficult and to take the piss and that 21 a free press is, of course, the cornerstone of 22 democracy." 23 There's no question about that. I just think that 24 there has been a section of our press that has become -- 25 allowed to become toxic over the last 20 or 30 years, Page 192</p>

<p>1 its main tactic being bullying and intimidation and 2 blackmail. I think that that needs a lot of courage to 3 stand up to and I feel that it's time -- you know, this 4 country has had historically a good record standing up 5 to bullies, and I think it's time that this country 6 found the courage to stand up to this bully now. 7 MR JAY: Thank you very much. 8 A. Okay. 9 LORD JUSTICE LEVESON: Mr Grant, thank you very much. I'm 10 conscious that a lot of effort went into making the 11 statements you made. 12 A. Yes. 13 LORD JUSTICE LEVESON: And although you may have felt that 14 you were on a back foot too often, it was a way of 15 getting the picture across so that everybody has had the 16 chance, through Mr Jay, to ask questions, but the thrust 17 of your evidence contained within your statements is 18 clear and you have no need to doubt that I've read it or 19 not paid full attention to it and won't continue to pay 20 full attention to it. 21 A. Well, thank you very much. Thank you. 22 LORD JUSTICE LEVESON: Right, thank you. Anything else? 23 MR CAPLAN: Just the issue of anonymity, if I may. 24 LORD JUSTICE LEVESON: Let Mr Grant return to where he comes 25 from so that he can just relax for a moment. Right,</p> <p style="text-align: center;">Page 193</p>	<p>1 with his evidence. In the absence of anybody saying 2 anything to the contrary, I propose to maintain that 3 anonymity and to allow him to give evidence in a way 4 that ensures it. 5 That will require taking certain measures. For 6 example, he's likely to give evidence in a cleared 7 Inquiry room. Obviously the core participants' lawyers 8 will be present, but otherwise, nobody. I'm likely not 9 to have the running transcript but to publish 10 a transcript as soon thereafter as possible, in case 11 something emerges that needs to be redacted. In that 12 way, I hope that his evidence will be put into the 13 public domain but in a form that doesn't damage the 14 anonymity that he has sought and which I have found to 15 be justifiable. 16 If anybody has any comment about that -- 17 I appreciate you've only just recently seen the 18 suggestions in that regard -- I'd be very, very 19 interested to hear them. As regards other people, I'll 20 make sure that I have a final protocol for you to look 21 at tomorrow, but as I say, I don't think it should 22 really make a difference to whether or not there is an 23 issue that's worthy of ventilation in the Divisional 24 Court, which of course is your decision entirely. 25 MR CAPLAN: Thank you.</p> <p style="text-align: center;">Page 195</p>
<p>1 yes. 2 Discussion 3 MR CAPLAN: Only this: that you made a ruling on 9 November. 4 If anybody was thinking of exercising their rights under 5 section 38 of the Act to seek any review of that ruling, 6 the time obviously expires on Wednesday. Since then, of 7 course, there has been a draft anonymity protocol. 8 I think you invited any further submissions to be with 9 you by last Thursday at 5 o'clock. We've certainly put 10 in some submissions. I was just raising the matter to 11 see if you wished to confirm the protocol or add 12 anything during the course of tomorrow before the time 13 limit expires. 14 LORD JUSTICE LEVESON: I'm happy to do that. I think that 15 essentially many of the points to be made I take on 16 board. I'm happy to clarify some things if they need 17 clarifying -- I'm not entirely sure they do -- but I'd 18 be surprised if anything in the protocol could impact on 19 the fundamental decision that I made in my ruling. But 20 if there's anything that needs to be done tomorrow, I'll 21 do it. 22 I think there are two slightly separate issues. 23 There's the anonymity that I've granted to one of 24 Mr Sherborne's clients, who I know as HJK, and there are 25 some knock-on consequences as to how we're going to deal</p> <p style="text-align: center;">Page 194</p>	<p>1 LORD JUSTICE LEVESON: Mr Jay? 2 MR JAY: Just a couple of points. First, we just received 3 submissions from the Metropolitan Police in relation to 4 the anonymity protocol just this afternoon, so those 5 will have to be considered for obvious reasons. 6 LORD JUSTICE LEVESON: Yes. Now that's come out, I'll say 7 the reason there hasn't been one is because it was only 8 up to literally the end of Friday that I saw the last 9 one. I wasn't sure we'd got them all -- and indeed, now 10 you've heard that I hadn't got them all -- and I didn't 11 want to finalise anything until we'd heard from anybody. 12 That's what I say in my own defence, which I wasn't 13 going to say anything about. 14 Right, anything else, Mr Jay? 15 MR JAY: In relation to HJK, there's one issue which need be 16 touched on, whether when he gives his evidence he will 17 not give evidence in relation to any named newspaper. 18 In other words, that will be redacted out of his 19 evidence. 20 LORD JUSTICE LEVESON: Yes. I've made it clear, I think, if 21 not in a ruling then certainly in argument, that in 22 relation to any anonymous witness, in order to protect 23 the position of any of the media, it would be quite 24 wrong to allow names or titles to be identified. I'm 25 not going to make decisions about names and titles. As</p> <p style="text-align: center;">Page 196</p>

1 everybody knows, I'm looking at custom and practices and
 2 ethics across the piece, which is why my questions to
 3 Mr Grant were of general rather than specific topics.
 4 I would adopt the same process for HJK, so if that's
 5 a matter of concern to anybody, then they should say so.
 6 Thank you. Well, thank you very much indeed.
 7 I repeat my thanks, as I will to all the witnesses,
 8 particularly those who have come, as all have today,
 9 voluntarily. Thank you very much.
 10 (4.28 pm)
 11 (The hearing adjourned until 10 o'clock the following day)
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