

<p>1 2 (2.00 pm) 3 MR JAY: Mr Thurlbeck, may I take you back quickly to 4 paragraph 81 of the judgment of Mr Justice Eady, which 5 is page 31228 of our bundle. It might be easier if you 6 turn it up in the file. 7 A. I have it on the screen here. 8 Q. Just in the email five lines down, the sentence: 9 "Please take a breath before you get angry with me!" 10 It's quite a sort of personal touch. That's not 11 your language, is it, rather than Mr Edmondson's? 12 A. I can't remember. I can't remember now this particular 13 phrase. 14 Q. Okay. 15 A. I can't remember why it was put in. 16 Q. It might be because you were striving to find a degree 17 of apparent empathy as part and parcel of an email which 18 was all yours. Would you accept that possibility? 19 A. I can't remember the precise circumstances of the 20 wording, how the email became to be worded. 21 Q. But you were telling us before lunch, I thought, that it 22 was Mr Edmondson's -- 23 A. Yes, well, you know, I'm telling you the process by 24 which we arrived at the email. Ultimately, as I've 25 said, I accept responsibility for sending it. I accept</p> <p style="text-align: center;">Page 1</p>	<p>1 questions, but do you see it now? 2 A. Look, I've explained before the break precisely what the 3 logical reasoning was behind sending that email. It was 4 offering the girls a choice. A decision had been made, 5 not by me but by others, that the part 2 was going to be 6 the girls' testimony. We knew who they were, we had 7 photographs of them, and at that time, even though it 8 wasn't published ultimately, at that time, the intention 9 was to publish that story. However poor story that 10 might have been, that was the intention. 11 So to that end I was asked to communicate with the 12 girls and draw to their attention the fact that this 13 would be the story, they would be named, they would be 14 pictured. However, my newspaper wanted to give them the 15 opportunity of giving us full testimony and in return we 16 would be willing to grant them anonymity. That was the 17 reason behind it. 18 Now, Mr Justice Eady and others might indeed 19 interpret that as being a blackmail attempt. 20 Q. Mm. 21 A. We didn't feel it was that at all. We were offering 22 them a way of presenting us with their testimony in an 23 anonymous fashion. 24 Q. I think what you're saying is you still don't genuinely 25 see the point; is that right?</p> <p style="text-align: center;">Page 3</p>
<p>1 responsibility for discussing how it should be phrased. 2 I accept that. So going forward from that, I put my 3 name to it and I'm quite prepared to hold my hands up to 4 it. 5 Q. Okay. You were asked questions about the email and the 6 surrounding circumstances by leading counsel for 7 Mr Mosley and they're recorded in the judgment at 8 paragraph 87, page 31231. You probably remember this 9 part of the judgment, Mr Thurlbeck, but the answer you 10 gave Mr Justice Eady in answer to cross-examination is, 11 perhaps unsurprisingly, similar if not identical in 12 purport to the answer you've given this Inquiry about 13 the choices you were giving the women. Do you see that? 14 A. Yes. 15 Q. At the end of the citation at page 31232, 16 Mr Justice Eady says: 17 "It seems that Mr Thurlbeck genuinely did not see 18 the point that it is elementary that blackmail can be 19 committed by the threat to do something which would not 20 in itself be unlawful." 21 So Mr Justice Eady is making it clear here that his 22 interpretation of the email -- and perhaps it was, 23 frankly, the only reasonable interpretation -- is that 24 this was blackmail. You didn't follow that at the time 25 when Mr Price, Queen's Counsel, was asking you</p> <p style="text-align: center;">Page 2</p>	<p>1 A. The point that Mr Justice Eady makes is that it could be 2 interpreted as being blackmail. I don't interpret it 3 that way, and we didn't at the News of the World. 4 Nobody at the News of the World -- nobody, from the 5 editor down -- has discussed or accused me of 6 blackmailing these girls. Now, if I had, I would have 7 expected Mr Myler, who was a very fair-minded man, to 8 have reprimanded me severely. We didn't have 9 a conversation about it because it simply was not the 10 case. 11 LORD JUSTICE LEVESON: This may be very, very important 12 evidence about custom, practice and approach to ethics. 13 Did anybody or did you give any thought to the Article 8 14 rights of the women? 15 A. As I say, we -- the newspaper -- 16 LORD JUSTICE LEVESON: No, no, Mr Thurlbeck, I'm sure that 17 question can be answered "yes" or "no". 18 A. There was no discussion about that. 19 LORD JUSTICE LEVESON: I'm sorry. Did you personally give 20 any thought to the Article 8 rights of the women? 21 A. We didn't -- we were offering them a choice. The 22 Article 8 rights were never discussed, were never 23 mentioned in any discussions that I had. I was asked to 24 communicate with them, ask them to come on board, give 25 us a testimony in return for anonymity. That is what</p> <p style="text-align: center;">Page 4</p>

<p>1 I did.</p> <p>2 LORD JUSTICE LEVESON: And you intended -- this was the</p> <p>3 idea -- you were going to publish the names, the faces,</p> <p>4 all the detail about these women? That's what you</p> <p>5 intended?</p> <p>6 A. You're saying it's what I intended. I didn't intend to</p> <p>7 publish. It is not my decision to publish. I am asked</p> <p>8 to report, and in reporting, I was asked to communicate</p> <p>9 with the girls to get their testimony in return for</p> <p>10 anonymity. But it wasn't my intention to publish, but</p> <p>11 my intention was to speak to them and write an article.</p> <p>12 There is a big distinction.</p> <p>13 MR JAY: You had to do all the necessary legwork and</p> <p>14 additional work to set in chain a process without which</p> <p>15 no one could publish; isn't that right?</p> <p>16 A. That's correct.</p> <p>17 Q. The general attitude in News of the World, if one is</p> <p>18 trying to identify culture, practice and ethics, was</p> <p>19 that following the judgment of Mr Justice Eady, there</p> <p>20 was nothing wrong with what you did or anybody else did;</p> <p>21 is that correct?</p> <p>22 A. We analysed the story. We wondered whether we'd missed</p> <p>23 something. We looked at the evidence again. We saw</p> <p>24 what we believed then and many believe now to have been</p> <p>25 very strong Nazi overtones in the evidence that we were</p> <p style="text-align: center;">Page 5</p>	<p>1 A. No, that wasn't the case. We didn't ignore his judgment</p> <p>2 and we didn't appeal against it. We took his judgment</p> <p>3 on board.</p> <p>4 It's fair to say, however, that there was a feeling</p> <p>5 at the News of the World and there was and is a feeling</p> <p>6 even across a cross-section of the media that -- and</p> <p>7 certainly the journalists -- all the journalists that</p> <p>8 I've spoken to on rival newspapers, broadsheet or</p> <p>9 tabloid, as well as the man in the street, they've all</p> <p>10 concluded that there was, in their opinions, a strong</p> <p>11 Nazi theme.</p> <p>12 LORD JUSTICE LEVESON: Mr Thurlbeck, Mr Justice Eady reached</p> <p>13 a conclusion.</p> <p>14 A. Yes.</p> <p>15 LORD JUSTICE LEVESON: You, your paper, whether you were</p> <p>16 involved in the decision or not, decided not to appeal</p> <p>17 it.</p> <p>18 A. Yes.</p> <p>19 LORD JUSTICE LEVESON: You could have appealed it.</p> <p>20 A. Yes.</p> <p>21 LORD JUSTICE LEVESON: The Court of Appeal would have</p> <p>22 reviewed the facts and would have examined the law.</p> <p>23 That was open to you.</p> <p>24 A. Yes.</p> <p>25 LORD JUSTICE LEVESON: Right.</p> <p style="text-align: center;">Page 7</p>
<p>1 provided with. So during our sort of post-mortem, if</p> <p>2 you like -- unofficial post-mortem -- we were still</p> <p>3 convinced, not in a spirit of self-righteousness but in</p> <p>4 a spirit of what the evidence presented to us, and the</p> <p>5 evidence was -- the facts spoke for themselves, we</p> <p>6 thought then and we think now. There was a lice</p> <p>7 inspection. There was simulated rape. There was</p> <p>8 beatings of the prisoners. There was the chanting of</p> <p>9 "We are the Arian blondes". These things, then and now,</p> <p>10 led to believe that this was strongly influenced by</p> <p>11 a Nazi theme.</p> <p>12 Q. Mr Thurlbeck, I've allowed you to give that answer</p> <p>13 without interrupting, but I must say you haven't</p> <p>14 answered the question. The question was:</p> <p>15 "The general attitude in News of the World, if one</p> <p>16 is trying to identify culture, practice and ethics, is</p> <p>17 that following the judgment of Mr Justice Eady, there</p> <p>18 was nothing wrong with what you did or anybody else did;</p> <p>19 is that correct?"</p> <p>20 A. It is correct, yes, and nobody questioned me about what</p> <p>21 I did or how I did it.</p> <p>22 Q. The attitude, really, was that Mr Justice Eady does not</p> <p>23 represent a sensible, right-thinking view of the common</p> <p>24 man, he is out on a limb, we can ignore his judgment.</p> <p>25 Is that also true?</p> <p style="text-align: center;">Page 6</p>	<p>1 A. I accept that.</p> <p>2 MR JAY: Instead, there was an application by the</p> <p>3 News of the World for scoop of the year, wasn't there?</p> <p>4 A. I understand Mr Myler put the story forward for that</p> <p>5 award, yes.</p> <p>6 Q. But as you were the chief reporter and you'd penned the</p> <p>7 story, he must have raised it with you before he made</p> <p>8 the application, didn't he?</p> <p>9 A. Actually, he didn't.</p> <p>10 Q. He didn't?</p> <p>11 A. No.</p> <p>12 Q. It was another decision he made without reference to</p> <p>13 you?</p> <p>14 A. No, he didn't consult me on it. The editor decides what</p> <p>15 stories he's putting forward for awards and he didn't</p> <p>16 mention it.</p> <p>17 Q. But maybe it doesn't or didn't surprise you that he made</p> <p>18 such an application because, from what you're saying,</p> <p>19 you remain quite proud of this story; is that fair?</p> <p>20 A. I make no comment on whether I'm proud of it or not.</p> <p>21 All I say is this: I think we got the facts correct.</p> <p>22 The facts are indisputable, and I think therefore they</p> <p>23 speak for themselves.</p> <p>24 Q. Let's look a little bit more at what Mr Justice Eady</p> <p>25 said about the facts being correct, because he</p> <p style="text-align: center;">Page 8</p>

<p>1 criticises you not merely in relation to those emails 2 I refer to, but also in relation to a transcript of an 3 interview which you asked Woman E to sign. This is 4 paragraph 88 of the judgment at 31232, please, 5 Mr Thurlbeck. 6 A. Yes. 7 Q. The circumstances here is that there was a meeting with 8 Woman E in Milton Keynes on the day before publication 9 of the follow-up article. So that, I think, takes us to 10 5 April 2008; is that right? It's a Saturday, anyway, 11 is it not? 12 A. I believe so. 13 Q. And you presented her with what purported to be 14 a transcript of an interview which you asked her to 15 sign? 16 A. Yes. 17 Q. Didn't you? 18 A. Yes. 19 Q. Had there been an interview? 20 A. There had been numerous sort of conversations over the 21 course of a week or so, which had been -- hadn't been 22 recorded because they were done sort of ad hoc as and 23 when. Perhaps in a haphazard unexpected way, she would 24 reveal facts. So I correlated all these facts that 25 I could from memory, put them into a memo and asked her</p> <p style="text-align: center;">Page 9</p>	<p>1 "The interview contained one sentence, however, 2 which was demonstrably false. He attributed to her the 3 following remarks: 'It wasn't a one-off. Max has been 4 hiring us to do this for years. He's addicted to 5 sado-masochistic sex involving Nazis and beatings.' This 6 contrasts [I'm reading Mr Justice Eady again] with the 7 contents of paragraph 38 of Mr Thurlbeck's witness 8 statement, in which he said: 9 "It was clear to me from speaking to Woman E on 10 27 March that the party the next day was the first time 11 she herself was involved with the claimant in a party 12 with any Nazi or military theme." 13 So there was a massive discrepancy there, wasn't 14 there? 15 A. I think this is what Woman E told me when I first met 16 her and I'm not quite certain about the second part. 17 I think I'm incorrect, that it wasn't the first time, 18 because she had referred to it before. I think my 19 second statement there is inaccurate. 20 LORD JUSTICE LEVESON: The witness statement? 21 A. I think the witness statement is inaccurate. My 22 statement there -- it should not have been "the first 23 time", because she had mentioned to me before that this 24 had happened in the past. 25 MR JAY: One shouldn't overlook, and maybe you are</p> <p style="text-align: center;">Page 11</p>
<p>1 if this was a true and accurate reflection of what she'd 2 been telling me, and if so, would she sign it, and she 3 agreed and she did. 4 Q. She signed it, is this right, as Mr Justice Eady 5 records, making no adjustments or corrections? 6 A. I can't remember if she made any corrections. 7 Q. That's what the judgment says. Do you see it? About 8 six lines into paragraph 88? 9 A. Yes. 10 Q. Then Mr Justice Eady continues: 11 "He [that's you] then subsequently added further 12 material to it, some of which was attributed to Woman E 13 on the article. When challenged by Mr Price about this, 14 he responded that it was all based on telephone 15 exchanges with her over several days and that the 16 interview represented a genuine reflection of what she 17 had told him." 18 A. Yes. 19 Q. "There are unhappily no written notes to confirm this 20 claim, which may be thought surprising for a journalist 21 of Mr Thurlbeck's experience." 22 A. Yes. 23 Q. That's true, isn't it? 24 A. Yes. 25 Q. Paragraph 89:</p> <p style="text-align: center;">Page 10</p>	<p>1 overlooking, paragraph 90 of the judgment, 31233, where 2 Mr Justice Eady deals with all of this very carefully, 3 as one would expect an experienced High Court judge to 4 do and that's precisely what he's done. 5 A. Yes. 6 Q. "Mr Thurlbeck explained this by saying that Woman E had 7 changed her story between 27 March and the signing of 8 this draft article on Saturday, 5 April." 9 So pausing there, do you remember giving that 10 explanation in court? 11 A. Yes. 12 Q. "Such a fundamental shift would surely have rung loud 13 warning bells as to her reliability as a source. 14 Whether this was so or not, he undoubtedly knew that she 15 had known the claimant only for a very short time 16 (a matter of months). It could not, therefore, possibly 17 be true that 'Max has been hiring us to do this for 18 years'. Mr Thurlbeck thought it would be wrong to 19 construe the word 'us' as including Woman E. He thought 20 it should be taken only to convey the impression that 21 the claimant had been employing the group as a whole for 22 years. This seems, in me, to be a disingenuous 23 interpretation of the words. The allegation was plainly 24 false and he must have known it to be false when it was 25 put into the article."</p> <p style="text-align: center;">Page 12</p>

<p>1 So you know what Mr Justice Eady is saying. He's 2 saying that you made it up. 3 A. No, I -- 4 Q. Deliberately. 5 A. I didn't make it up at all. If Woman E changed her 6 version of events slightly, you know, this was not an 7 uncommon feature of most people who went through very 8 detailed interviews with me. They would -- some details 9 would change sometimes in the telling, and they would 10 revise what they'd said before, for accuracy. I wasn't 11 overly concerned, from memory -- I mean, it's so long 12 ago I can't precisely remember now, I have to say, but 13 I wasn't overly concerned that there may have been 14 a shifting of emphasis. What I was more concerned about 15 with was what was on the tape when it actually took 16 place, when it actually happened. 17 LORD JUSTICE LEVESON: But when you've compiled your witness 18 statement, you were doing it for High Court proceedings, 19 which were incredibly important to you and your 20 newspaper. 21 A. Yes. 22 LORD JUSTICE LEVESON: So you'd want that to be 110 per cent 23 accurate. 24 A. Yes. 25 LORD JUSTICE LEVESON: Now you're saying to me it's wrong? Page 13</p>	<p>1 Q. You say "nobody", but the one individual who counts, the 2 individual who'd heard the evidence, seen the tape, 3 judged the credibility and reliability of witnesses, 4 including you, did come to that considered conclusion, 5 didn't he? 6 A. Yes, he did. 7 Q. May I ask you whether you have read and considered the 8 evidence of Mr McMullan, which the Inquiry heard about 9 13 days ago now? Do you have the transcript? 10 A. I read the transcript and I saw it live. 11 Q. The picture he paints, is it one with which you are 12 familiar? 13 A. Which particular aspect? 14 Q. Perhaps I can ask the general question: any of it? Then 15 I'll ask particular questions. You might say, "Well, it 16 completely resonates with my experience", or you might 17 say, "It completely conflicts with my experience." So 18 help us, please. Or maybe it's a bit of both? 19 A. It doesn't reflect my experience of the 20 News of the World at all. My experience of the 21 News of the World is that it was a highly professional 22 organisation. It was staffed by some of the best 23 journalists on Fleet Street, who worked with great 24 diligence and integrity, and continue to do so. 25 I don't -- I was proud to work alongside all of my Page 15</p>
<p>1 A. Well, I can't remember the circumstances of why they 2 might differ, you know, from the -- it being the first 3 time to it have happened before. My memory is that 4 she'd said it had happened before. 5 LORD JUSTICE LEVESON: And not only is it wrong; you didn't 6 say that to Mr Justice Eady. 7 A. I can't remember now. 8 LORD JUSTICE LEVESON: I think he probably would have noted 9 it if you had, Mr Thurlbeck. 10 A. Yes. 11 LORD JUSTICE LEVESON: All right. 12 MR JAY: Mr Justice Eady refers to your journalism, 13 paragraph 170 of the judgment -- you probably remember 14 this -- as "at least casual and cavalier". 15 A. My journalism? 16 Q. In this respect, this story. 17 A. All right. 18 Q. Fair judgment, isn't it, page 31521? 19 A. Mr Justice Eady is entitled to his opinion, but my -- 20 all I would say is this, in defence of this particular 21 story: we were absolutely certain that we got the facts 22 right and nobody has come forward to show me that what 23 I said had happened did not happen. You know, it was 24 a factual account of what went on between those four 25 walls. Page 14</p>	<p>1 colleagues. I have enormous respect for all of them. 2 You know, there may have been a small caucus of people 3 who gave us a bad reputation now. Unfortunately, the 4 bulk of those very decent journalists have been tainted 5 by that and are now finding it extremely difficult to 6 get work. But I have to say that my experience of 7 working with the vast majority of the people on the 8 News of the World was wonderful. They are an exemplary 9 bunch of people who could work on any newspaper of the 10 world. 11 It has to be said that the News of the World wasn't 12 the biggest selling newspaper in the world for nothing. 13 It was there because it was put together by some of the 14 most gifted journalists of their generation. That might 15 seem a very unfashionable thing to say in the light of 16 what's going on now and the light of recent events, but 17 that was a tiny part of the News of the World's 18 168-year-old history, and I was privileged to be part of 19 that organisation, and I don't recognise the picture 20 that was painted by Paul McMullan. 21 Q. May I seek to draw out different aspects of the picture 22 so that you can comment? 23 A. Yes. 24 Q. One point he made -- and this is in transcript for Day 9 25 at page 32. We can make it available to you if you wish Page 16</p>

<p>1 to see it but let me paraphrase it for you. He said 2 that you had to have published a number of stories 3 a year -- I think he said it was 12 stories -- but if 4 you didn't get enough bylines, the consequence was that 5 you got fired. Is that correct or was that correct -- 6 A. It wasn't part of the News of the World rule book, but 7 there was a kind of an unofficial recognition that 8 bylines were a reasonable performance indicator, and if 9 your byline count was low, then obviously your job would 10 be in jeopardy, but I think that happens on every 11 newspaper. In fact, it does. 12 Q. Public interest, which he deals with first of all at 13 page 39. The question which was asked at line 12 of 14 page 39 in relation to blagging -- the answer was more 15 general. Question: 16 "When you did that, did you give any consideration 17 as to whether or not it would be in the public interest 18 to blag?" 19 Answer: Yes, it was always in the public interest. 20 I mean, circulation defines what is the public interest. 21 I see no distinction between what the public is 22 interested in and the public interest. Surely they're 23 clever enough to make a decision whether or not they 24 want to put their hand in their pocket and bring out 25 a pound and buy it."</p> <p style="text-align: center;">Page 17</p>	<p>1 really give me a kind of specific example of a story 2 here but -- you know, if we were exposing a drug dealer, 3 then we'd have to decide whether or not there was 4 evidence of a crime being committed, and if there was, 5 then clearly it would be in the public interest to 6 reveal the fact that a crime was taking place in 7 a school or a public place or wherever. We'd have to 8 look -- you know, before somebody appeared in the 9 News of the World, there would invariably be a public 10 interest discussion about it. 11 Q. Mr McMullan continued at page 40, line 9: 12 "The reason why the News of the World sold 5 million 13 copies is that there were 5 million thinking people and 14 that's what they wanted to read. That's what drove the 15 paper. We were the mirror to society, the daily mirror 16 in fact." 17 Did that represent your and other people's thinking 18 at the News of the World? 19 A. The readers were very important to us. There's no 20 question about that. But they were important to us in 21 the sense of we had to decide or find out, we had to 22 discover what particular stories they were interested 23 in. In the 1960s/70s, it was crime. In the 1990s, it 24 was royals. In 2000s, it was showbusiness. So we'd be 25 responsive, obviously, to what the public were</p> <p style="text-align: center;">Page 19</p>
<p>1 Now, does that represent common thinking at the 2 News of the World? 3 A. No. 4 Q. And why not? 5 A. Well, it's plainly, you know, a travesty of what the 6 public interest is all about. I mean, we all understand 7 that there is a vast difference between the public 8 interest and what the public are interested in. They're 9 two completely different things. 10 The public interest was always something that we 11 would be aware of, that we would discuss. I don't 12 recognise that at all. 13 Q. Although you told us before 2008 it was a consideration 14 which was less punctiliously adhered to? 15 A. No, we were talking about privacy then, weren't we, not 16 the public interest? But no, the public interest 17 features very, very highly on a sort of -- on the 18 yardstick of how we judge whether or not a story goes in 19 the paper. I don't recognise that at all, and frankly 20 it's a million miles away from the truth. 21 Q. So what considerations then did you take into account in 22 assessing the public interest balance? 23 A. In the Mosley case? 24 Q. No, I'm talking more generally. 25 A. More generally? Well, we would look at -- you'd have to</p> <p style="text-align: center;">Page 18</p>	<p>1 interested in. There's no question about that. 2 But, you know, to say that there was a -- that the 3 public interest and what the public were interested in 4 were somehow blurred is completely false. 5 Q. But you were acutely aware at all material times of the 6 matters which did interest the public, weren't you? 7 A. Yes. 8 Q. In that respect, you were a mirror to society, weren't 9 you? 10 A. We had to respond to what our customers, if you like, 11 our readers, wanted to read. But that doesn't mean 12 because they wanted to read it, it gave us carte blanche 13 to publish anything they were interested in. 14 Q. But subject be libel, which you've clearly explained -- 15 the News of the World did not want to get sued for 16 libel -- the only real and practical constraint before 17 the outcome of the Mosley case was whether you assessed 18 whether or not the story was true. That was where your 19 enquiry began and ended, wasn't it? 20 A. No, that's certainly one criteria and one of the most 21 important criteria that we would use, but not the sole 22 criteria. You know, one had to decide whether or not it 23 would be in good taste, for example. Many stories came 24 out where that simply didn't cross that threshold. So 25 regardless of whether or not the public would be</p> <p style="text-align: center;">Page 20</p>

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<p>1 interested in it or whether it was in the public 2 interest, it simply wouldn't end up on the news list 3 because it was a matter of bad taste or it was unfair, 4 unjust or whatever. But it wasn't the sole criteria 5 that we used. The libel laws weren't the sole sort of 6 barrier to publication, if you like. 7 Q. Did these good taste considerations enter into the 8 equation at all in Mr Mosley's story? 9 A. We felt that it was -- many aspects of it were 10 distasteful, especially what we believed was the 11 sexualisation of the plight of the Jews, and we thought 12 that it was vital that Mr Mosley, who was an elected 13 representative of 100 million people, many of whom could 14 have come from the Jewish faith -- that they had a right 15 to know, regardless of whether the information was 16 tasteful or distasteful. 17 LORD JUSTICE LEVESON: But, you see, that's a very fine 18 stand, Mr Thurlbeck. What I don't understand, 19 therefore, is why you didn't put it to him, because if 20 it was an unanswerable story, that each one of you was 21 satisfied was rock solid, why make a decision -- and 22 I appreciate you didn't, but why should it not go to 23 him? 24 A. I'm afraid that is really a question you need to address 25 with the editor.</p> <p style="text-align: center;">Page 21</p>	<p>1 If my newspaper had spent a lot of time and maybe 2 thousands of pounds on an investigation and the legal 3 process was going to ensure that my property was going 4 to become the property of a rival, what would I do? 5 It's a very difficult judgment call. If we did that 6 every time, we would simply be handing our rival 7 newspapers with the property that we'd paid very dearly 8 for. 9 LORD JUSTICE LEVESON: But you had the video. Nobody else 10 had it. 11 A. Yes, but they'd have the -- if this was the matter of an 12 injunction, the newspapers wouldn't need the video 13 because they would have the qualified privilege it would 14 take from a court hearing. They could report it as 15 fact. 16 MR JAY: The injunction hearing would have been in private, 17 wouldn't it? 18 A. Yes, but these things always leak out. 19 Q. That's why your newspaper took such careful steps to 20 limit the people who knew about the story? 21 A. You'll have to ask Mr Myler about that. As I keep 22 referring you back, this is not part of my 23 decision-making process. 24 Q. Although you are fully aware, it seems, from your last 25 series of answers, what the decision-making process was</p> <p style="text-align: center;">Page 23</p>
<p>1 LORD JUSTICE LEVESON: Well, I'm asking -- 2 A. Because it wasn't my decision. 3 LORD JUSTICE LEVESON: Do you think it should have been put 4 to him? 5 A. Right. If we'd put it to Mr Mosley, we all know that 6 Mr Mosley would have sought an injunction. 7 LORD JUSTICE LEVESON: Yes? 8 A. The likelihood is that there would have been an interim 9 injunction granted until the event -- until the matter 10 had been considered properly by the judge. 11 LORD JUSTICE LEVESON: Yes, maybe. 12 A. In that event, the story would have leaked out and 13 become the currency and property of our rivals. 14 So this, I imagine, is a decision that an editor would 15 have when he's deciding what to do with regard to 16 presenting, you know, potential -- people who are 17 potentially appearing in the newspaper, but as I say, 18 it's not my -- this is not my opinion. This is not my 19 decision. They were made by others. But you're asking 20 me what my opinion is of what process of thinking they 21 might have gone through -- 22 LORD JUSTICE LEVESON: No, no, I actually asked you what you 23 would have done. 24 A. What I would have done? I really don't know. I don't 25 know. Under the circumstances, it's a difficult call.</p> <p style="text-align: center;">Page 22</p>	<p>1 in Mr Myler's mind? 2 A. Yes. 3 Q. That's true, isn't it? 4 A. I don't know what his decision-making process was. 5 You'll have to ask him. I'm saying this is probably the 6 thought process that he would have gone through. 7 Q. I want to go a little bit further than that, 8 Mr Thurlbeck. I appreciate your apparent diffidence, 9 but had you been the editor it would have been precisely 10 your decision-making process because you wouldn't have 11 wanted to run the risk of losing such a glorious story. 12 That's the truth, isn't it? 13 A. I really don't understand why you want to find out what 14 my opinion would have been if I was the editor because 15 I wasn't the editor. 16 LORD JUSTICE LEVESON: I'm actually thinking about your 17 ethical approach, Mr Thurlbeck, because you represent 18 one of a number of journalists who are giving evidence 19 from News of the World and that's what I'm required to 20 consider. 21 A. Yes. 22 LORD JUSTICE LEVESON: That's the terms of my reference. 23 A. Mm. 24 MR JAY: Humour me to that limited extent and try and 25 extrapolate and enter the world of more generalised</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 debate. What would your decision have been? 2 A. On the Mosley case? 3 Q. Mm. 4 A. I don't know. I haven't sat down and seriously 5 considered what I would have done if I was the editor. 6 Q. Okay, Mr Thurlbeck, I'll move on to another point. 7 We've heard that answer. 8 Back to Mr McMullan at page 97 of the transcript, 9 where he talks about the culture in relation to 10 expenses. His evidence was, page 98, line 5: 11 "In some regards, we weren't that well paid. My 12 leaving salary as the deputy features editor was only 13 £60,000 and as a way to bump up salaries, we were given 14 a certain amount of leeway. So I claim, I don't know, 15 another 15, 20 a year, of which 3 was legitimate. Is 16 that what you mean? Is that legal? It's not. I mean, 17 that was just the general ethos." 18 Does that chime well your experience? 19 A. No, it most certainly doesn't. The managing editor at 20 the time, Stuart Kuttner, was the man who signed all our 21 expenses, and a more forensic examiner of newspaper 22 expenses I don't know of. Everything had to be 23 receipted. If there was anything that looked as if it 24 might not be legitimate, it would be returned with 25 a question mark in black felt tip on it and a demand for Page 25</p>	<p>1 A. Yes. 2 Q. Can I ask you about Mr Derek Webb. What was your 3 involvement, if any, with him? 4 A. He would be employed to observe people, report back to 5 journalists on activities that we might be investigating 6 for the paper. He would compile a report. A journalist 7 would then act on that report and investigate further 8 with him or alone. 9 Q. The question was: what was your involvement with him? 10 And your answer was: he would be employed. 11 A. Yes. 12 Q. I think the question was more directed to you. did you 13 employ him? 14 A. I did, yes. 15 Q. Do you remember approximately when you first started 16 engaging him? 17 A. I think it was at the beginning of 2002 or 2003, 18 something like that. I'm not quite sure. 19 Q. That matches up with the witness statement he has 20 provided. Can you remember approximately how many 21 assignments you gave him? 22 A. Dozens. I can't put a number on it, but several dozen, 23 I would think. 24 Q. Can you assist us with the type of assignments in 25 general terms? Page 27</p>
<p>1 an explanation. I don't know who was signing 2 Mr McMullan's expenses, but it certainly wasn't 3 Mr Kuttner. 4 Q. He gives us one example -- this is page 99 -- where 5 Mr Kuttner himself -- you probably don't know about 6 it -- on getting back from Kosovo and Swiss Air flying 7 out the last plane, so there was a five star hotel in 8 Greece and a first class Swiss air flight. But you may 9 not know much about that; is that correct? 10 The picture you're painting, is this right, is 11 entirely different? It's 180 degrees in the other 12 direction, as it were, from Mr McMullan's? 13 A. Yes. 14 Q. Doesn't chime at all? 15 A. Correct, absolutely. 16 Q. Can I ask you next, please, about the use of private 17 investigators. 18 LORD JUSTICE LEVESON: Just before you leave Mr McMullan, 19 I'm going to ask, because I think it's only fair: do you 20 know of a reason why Mr McMullan should come along and 21 tell me what you describe is a complete tissue of fairy 22 tale? 23 A. I have no idea whatsoever. It was an enormous surprise 24 to me and my colleagues. It's not a place I recognise. 25 MR JAY: Okay. Use of private investigators. Page 26</p>	<p>1 A. Yes. We would -- the newspapers, for decades, have been 2 involved in observing human behaviour and reporting on 3 it. Derek Webb was especially good at observing and he 4 would observe and he would compile evidence on all sorts 5 of activities, illegal or otherwise, and he would come 6 back to us and we would act upon whatever he was 7 reporting on. 8 Q. Were your primary surveillance targets politicians and 9 celebrities? 10 A. I would say they formed a large percentage, yes. 11 Q. In relation to celebrities -- take them first -- were 12 the assignments in the main directed to finding out 13 about their private lives? 14 A. Only if their private life came into conflict with their 15 public life. 16 Q. That wasn't the question. 17 A. It was -- 18 Q. Did the assignments in the main relate to their private 19 lives? 20 A. Yes. 21 Q. In other words -- 22 A. Their activities. 23 Q. -- their intimate relationships? 24 A. Not always. 25 Q. But usually; is that right? Page 28</p>

<p>1 A. I wouldn't say usually. Sometimes it could be their 2 intimate relationships or sometimes it could be 3 drug-taking or sometimes it could be maybe fraternising 4 with undesirables, but it was right across the spectrum. 5 Q. Can I take those three in turn. Drug-taking. In cases 6 where Mr Webb was put onto a celebrity in relation to 7 drug-taking, did you usually have evidence that 8 suggested that drug-taking might be involved? 9 A. We'd receive a tip-off and then research it. 10 Q. Is that your usual practice or occasion practice? That 11 you had a tip-off? 12 A. It was always -- 99 per cent of the time, I would say we 13 had -- it was a tip-off to the news desk or to me 14 directly from a contact and then we would research -- 15 you know, we would research that information. 16 Q. In relation to the second category, which I think was 17 personal relationships, what information did you have, 18 in advance of putting the private investigator onto 19 a case, that there was anything worse examining or 20 exploring in relation to the personal relationship of 21 the particular celebrity? 22 A. Well, the information would normally come either to the 23 news desk from an informant on the outside, somebody 24 knowledgeable about the person's life, or it would come 25 direct to me from a contact or a source that I'd</p> <p style="text-align: center;">Page 29</p>	<p>1 up as you go along on that point, are you? 2 A. How many times did I use him? 3 Q. No, how often he actually yielded anything for you. 4 A. Well, it was considerable. I mean Derek Webb's 5 assistance was considerable, so it was a considerable 6 number of times. 7 Q. How many stories, then, approximately, were you able to 8 publish as substantiated by his work? 9 A. I can't put a figure on it, I really can't. Several 10 dozen maybe? Or -- I don't know. I don't have a log of 11 the stories that Derek Webb helped me out on over the 12 years. 13 Q. Does it follow that often he wasn't able to substantiate 14 your story? 15 A. Sometimes he would be put on a story and then, for 16 whatever reason, after two days or a day -- in other 17 words far too soon -- he would be called off in order to 18 do something else for somebody else. So very often the 19 story -- his investigation would not be completed. It 20 would barely be started. 21 Q. What about your third category, which I believe was 22 fraternising with undesirables, in relation to setting 23 Mr Webb onto a case. What do you mean by that? 24 A. An example might be a police officer maybe consorting 25 with known criminals or a teacher consorting with a drug</p> <p style="text-align: center;">Page 31</p>
<p>1 established over the years. So it would either come 2 from the news desk or from one of my contacts. 3 Q. You didn't, as it were, go on any fishing expeditions? 4 Is that the position, Mr Thurlbeck? 5 A. It was too expensive to go on fishing expeditions, as 6 you say, and it's just not something we would do. 7 Fishing expeditions weren't part of our sort of make-up. 8 We would get information from contacts. That's the way 9 it worked. 10 Q. So fishing expeditions, wholly anathema to the culture 11 and ethos of the News of the World? Is that your 12 evidence? 13 A. Well, it wasn't something that we did, to my knowledge. 14 I certainly received information from contacts and acted 15 upon it, but I can only speak for myself. 16 Q. How often did Mr Webb's activities substantiate the tips 17 that you received, in relation in particular to snippets 18 about sex? 19 A. I can't put a percentage figure on how many ended up in 20 the newspaper. 21 Q. Again, that's not quite the question. How often did his 22 activities substantiate the snippet? 23 A. I would say very often. He was as very, very effective 24 operator. 25 Q. Do you have any idea how often? You're not making this</p> <p style="text-align: center;">Page 30</p>	<p>1 dealer or whatever. That sort of basis might be the 2 start of an investigation, but not necessarily the end 3 of it. You know, we'd need to establish the facts. 4 Q. In deciding whether or not to set Mr Webb or someone 5 like him onto a case, what consideration did you give to 6 the public interest? 7 A. Well, we'd have to, you know, decide whether or not the 8 activity that was alleged was worthy of reporting 9 because it was in the public interest. You know, 10 sometimes we might have to investigate further in order 11 to establish whether or not there was a public interest 12 justification. But these are decisions that are made as 13 you're going through an investigation, at the beginning 14 and ultimately at the end. 15 Q. Were these decisions ever documented? The public 16 interest decisions, that is. 17 A. I don't think they were. 18 Q. You don't -- 19 A. No, no, I don't think so. 20 Q. Did you use other private investigators? That's to 21 say -- well, did you use other private investigators as 22 well as Mr Webb? 23 A. Mr Webb was the main private -- I think several had been 24 used over the years by different people at the 25 newspaper, but my -- the person that I dealt with most</p> <p style="text-align: center;">Page 32</p>

<p>1 of all was Derek Webb.</p> <p>2 Q. Do you remember using Mr Whittamore?</p> <p>3 A. I don't remember but I understand my name is there as</p> <p>4 having called him several times, many, many years ago,</p> <p>5 I believe. So yes, I think it's safe to say that I have</p> <p>6 used him, yes.</p> <p>7 Q. It's a long time ago now. You probably don't remember</p> <p>8 the circumstances --</p> <p>9 A. I really don't, I don't.</p> <p>10 Q. Was there any uneasiness in the News of the World -- I'm</p> <p>11 speaking generally now -- about the use of private</p> <p>12 investigators, particularly looking at the private lives</p> <p>13 of celebrities and, on occasion, politicians?</p> <p>14 A. Well, specifically the use of private eyes was merely an</p> <p>15 extension of what journalists always do anyway, and that</p> <p>16 is to observe and report on human behaviour. It so</p> <p>17 happens that Derek Webb had very specialised skills in</p> <p>18 this area, which is why he was used as an extension of</p> <p>19 the journalistic process, if you like. So we didn't</p> <p>20 have any objections to using Derek Webb. He was -- or</p> <p>21 concerns. To my knowledge, he didn't do anything</p> <p>22 illegal, he didn't do anything that would cause us or</p> <p>23 him to be embarrassed. He was a very, very effective</p> <p>24 former detective and we were very grateful for his</p> <p>25 services. He was a particularly good operator and very</p> <p style="text-align: center;">Page 33</p>	<p>1 Q. It's sure enough what sells a story, though, isn't it?</p> <p>2 A. Well, as I say, you know, you'll -- the 5 million,</p> <p>3 6 million readers of the News of the World, more, you</p> <p>4 know, obviously bought it for these reasons. They liked</p> <p>5 the mixture of the stories that went in.</p> <p>6 Q. If I were to ask you in your own words to define the</p> <p>7 culture of the News of the World at all material times,</p> <p>8 give us four or five key bullet points, please.</p> <p>9 A. The culture was one of thoroughness. There was -- the</p> <p>10 first thing that struck me when I joined the</p> <p>11 News of the World in 1988 was -- when I first started</p> <p>12 working there, was how thorough their journalism was.</p> <p>13 There was no stone left unturned. They were extremely</p> <p>14 fastidious journalists and I entered that culture with</p> <p>15 the belief that we had to make sure the story was</p> <p>16 correct, and in 26 years in journalism, I've never been</p> <p>17 successfully sued for libel and I have never had a PCC</p> <p>18 ruling against me. Our newspaper had it instilled in us</p> <p>19 that we had to be thorough, that we had to be extremely</p> <p>20 rigorous in the stories we wrote because the reputation</p> <p>21 of the newspaper rested upon us getting it absolutely</p> <p>22 right. That was the overwhelming -- that was the</p> <p>23 culture there. All my colleagues were off the same</p> <p>24 breed. They were, by and large, by and large --</p> <p>25 I accept that this is not, by any manner of means,</p> <p style="text-align: center;">Page 35</p>
<p>1 genuine and very above board.</p> <p>2 Q. There must have been occasions, though, where Mr Webb</p> <p>3 truly struck gold and came out with an extremely</p> <p>4 confidential and potentially salacious piece of</p> <p>5 information which you and others in the office would</p> <p>6 read before making a decision whether or not to publish</p> <p>7 the story. Did you ever feel any uneasiness about the</p> <p>8 ethics of doing that?</p> <p>9 A. About the ethics of what?</p> <p>10 Q. Reading the type of information I've referred to.</p> <p>11 Highly confidential. When I say "salacious", I mean</p> <p>12 intimate. Usually involving sex, to be more explicit.</p> <p>13 A. Well, you know, if, for example, a trade union leader</p> <p>14 was being followed by Derek Webb and that trade union</p> <p>15 leader was having an affair and he was married with</p> <p>16 another woman and he was staying at a hotel and that</p> <p>17 hotel was being paid for by his union members, then</p> <p>18 clearly we would be in a very great public interest</p> <p>19 scenario. And the salaciousness of it, as you put it,</p> <p>20 is -- gives us no concern. What we were concerned about</p> <p>21 is the public interest justification, and that example</p> <p>22 I've just given you is actually a very real one. So</p> <p>23 we'd have to weigh up one against the other. The</p> <p>24 salaciousness in itself is not the justification for</p> <p>25 writing the story. That is the detail of the story.</p> <p style="text-align: center;">Page 34</p>	<p>1 100 per cent, but it's rather like saying because Nick</p> <p>2 Leeson brought down Barings, then Barings was therefore</p> <p>3 a toxic institution. The News of the World was not</p> <p>4 a toxic institution at all. The people who were there</p> <p>5 when it was closed were some of the finest journalists,</p> <p>6 as I've said, that I've ever had the privilege of</p> <p>7 working with. I did not recognise Paul McMullan's</p> <p>8 evidence at all, and I think if you were to call before</p> <p>9 this Inquiry every other journalist on the</p> <p>10 News of the World, they would say more or less what I am</p> <p>11 telling you now. That was the culture, one of rigour.</p> <p>12 Q. We'll take up that offer in part, I think, Mr Thurlbeck,</p> <p>13 but not obviously in full. You are, I understand, very</p> <p>14 concerned that I don't go into the detail of the Bob and</p> <p>15 Sue Firth story; is that right?</p> <p>16 A. All I would say on this matter is that the PCC</p> <p>17 investigated the allegations made by this couple --</p> <p>18 LORD JUSTICE LEVESON: Mr Thurlbeck, I think I've said this</p> <p>19 to you twice. I am looking at the customs, practice and</p> <p>20 ethics of the press.</p> <p>21 A. Yes.</p> <p>22 LORD JUSTICE LEVESON: One of the questions I have to</p> <p>23 consider is whether the PCC provided an effective remedy</p> <p>24 for those who complained about stories.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 36</p>

<p>1 LORD JUSTICE LEVESON: So the PCC endorsement is not 2 definitive. 3 A. No, I understand that. All I can say is this: that the 4 adjudicator of these matters in our industry, the only 5 adjudicator, the PCC, did adjudicate in this matter in 6 1998. It examined all their evidence and it examined 7 all my evidence. It exonerated me. It declared that 8 the article was "justified" and in the public interest, 9 end quotes. My editor, deputy editor and managing 10 editor went to review all the Firths' evidence and the 11 conclusion from those three people was that there was no 12 impropriety. 13 Now, beyond that, for the reasons that I've 14 explained today you privately and to your team, I intend 15 to say no more on the matter, with respect. 16 LORD JUSTICE LEVESON: Well, you can -- I'm not going to 17 force you to respond, but you must understand -- 18 A. I understand, sir. 19 LORD JUSTICE LEVESON: -- that I am looking at this issue, 20 along with many, many others, and I want to make sure 21 that you do have an opportunity to respond -- 22 A. Yes. 23 LORD JUSTICE LEVESON: -- to complaints and criticisms and 24 concerns that have been articulated to me because I want 25 to be fair.</p> <p style="text-align: center;">Page 37</p>	<p>1 Then they go on to say that the use of subterfuge by 2 you was in the public interest. But wouldn't it be fair 3 to say that the Commission ducked the principal 4 allegation, namely that relating to full sex, which you 5 had made in your article? 6 A. As I say, I'm not going to go any further on the 7 statement I've made. My position is clear. I was 8 exonerated by the PCC -- that is the main adjudicator of 9 these matters -- by my editor, my deputy editor and my 10 managing editor. 11 MR JAY: Well, I'm not going to press that any further. 12 Thank you very much for your patience, Mr Thurlbeck. 13 MR SHERBORNE: Sir, there are a number of points to correct 14 in Mr Thurlbeck's evidence. I'll stick to the more 15 significant ones. 16 LORD JUSTICE LEVESON: Just hold on. Are you applying to 17 ask him any questions? 18 MR SHERBORNE: I'm not, sir, no, but there are a number of 19 factual points that I need to raise. 20 LORD JUSTICE LEVESON: By all means, you can do that, as 21 I've allowed others to do. But Mr Thurlbeck needn't 22 stay there. 23 MR SHERBORNE: It's a matter for Mr Thurlbeck. 24 LORD JUSTICE LEVESON: No, he's no longer giving evidence 25 Therefore it's not a matter for him; it's a matter for</p> <p style="text-align: center;">Page 39</p>
<p>1 A. Yes, I understand. 2 LORD JUSTICE LEVESON: Now, if you don't want to take the 3 opportunity to do so, then that's up to you. But I do 4 want to give you the chance. 5 MR JAY: So would you like to answer questions on this issue 6 or not? 7 A. I've given you my full statement on the matter, Mr Jay. 8 Q. So that we see the full position, I will read out the 9 PCC adjudication. Whether or not you have an objection 10 to that -- 11 A. No, please go right ahead. 12 Q. It's addressed to Mrs Firth, who was the complainant, 13 obviously. It's dated 13 November 1998. We can make 14 copies available if necessary. 15 "The Commission took the view from the evidence you 16 had provided that the bulk of the article appeared to be 17 accurate and that a sexual service was provided for 18 guests. Under these circumstances, the Commission did 19 not consider that the main allegation in the article 20 referring to sexual services was significantly 21 misleading, though the sexual service referred to was 22 hand relief. However, it made no finding on the 23 complaints regarding the allegations that you had 24 offered full sex or that your husband had had sex with 25 clients."</p> <p style="text-align: center;">Page 38</p>	<p>1 me. Thank you. 2 (The witness withdrew) 3 MR SHERBORNE: Sir, the first point is that contrary to the 4 evidence given by Mr Thurlbeck in answer to Mr Jay, 5 Mr Thurlbeck did admit at trial that prior to the 6 filming of the Sieg Heil episode he had previously had 7 discussions with Woman E about the Sieg Heil. Can 8 I read very briefly from the transcript of the trial. 9 It's Day 3 for your record, sir, page 66, and he was 10 asked this question at line 38 by Mr Price, after there 11 had been some questioning about the Sieg Heil and 12 Mr Thurlbeck had given the answer which he gave this 13 morning in relation to the wording, which he said was 14 somewhat convoluted. He was asked this: 15 "You had discussed the question of a possible 16 Sieg Heil with Woman E before, hadn't you? 17 "Yes." 18 Said Mr Thurlbeck. 19 "In what context? 20 "I realised that if there was going to be a Nazi 21 theme and if Mr Mosley was to give the Sieg Heil salute, 22 then that would be a very crucial image for us to 23 capture. It would be a very powerful and very emotive 24 image and I saw it as being my job to make sure that if 25 Mr Mosley did give the Fascist salute, that our girl had</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 sufficient instruction and we had a camera able enough 2 to catch that image, and that is what I'm talking 3 about." 4 LORD JUSTICE LEVESON: Yes. 5 MR SHERBORNE: Secondly, Mr Thurlbeck, as you will recall, 6 gave evidence that the story about Mr Mosley should not 7 have been published if there had not been a Nazi theme. 8 In response to Mr Jay asking whether from the start, it 9 had always been understood to be a Nazi party that was 10 to take place on 28 March or whether in fact it had 11 started as something different, Mr Thurlbeck, you will 12 recall, rejected that suggestion and said this -- and 13 I think it's page 109, line 21 of today's [draft] 14 transcript: 15 "The first conversation with Jason [Jason was the 16 tipster, as you'll recall] indicated that there was 17 a Nazi theme, so it was very firmly in our minds by the 18 time we went down to see him." 19 In fact, the witness statements that Mr Thurlbeck 20 put in at trial, paragraph 9, said this: 21 "Jason did not mention the Nazi theme at all on this 22 first telephone call. At this point, I envisaged that 23 any article that might be published would simply expose 24 the claimant's fetish for sadomasochism and his use of 25 prostitutes and a dominatrix." Page 41</p>	<p>1 MR SHERBORNE: Sir, I had believed it was and I've just had 2 confirmation it is. 3 LORD JUSTICE LEVESON: Fine. 4 MR SHERBORNE: Paragraph 36. She says: 5 "To make things worse, I was contacted by Neville 6 Thurlbeck on the afternoon of 2 April 2008 by telephone. 7 He called several times before I finally answered the 8 phone at approximately 6 o'clock. He told me his name 9 and asked if I had received his email. I said no, as 10 I'm in full-time work and I'm only free to check my 11 private emails after work. I suggested he could tell me 12 now and then what he has written in his email. He told 13 me his name again and told me he had written the article 14 in News of the World. I was frozen on the phone. He 15 said he's watching a video of us which was four hours 16 and 27 minutes along. I remember the words precisely. 17 I was amazed he would have the nerve to call me, having 18 written the article. Words cannot describe how angry 19 I was and remain with him. I think his actions are 20 inexcusable and disgusting. After the initial 21 phone call, I received several emails from Mr Thurlbeck, 22 offering to buy a story from me about Mike in return for 23 anonymity. 24 "Mr Thurlbeck called me again on the morning of 25 3 April 2008 on my mobile and said, 'We can play this Page 43</p>
<p>1 That recalls very firmly to mind, sir, you might 2 think, paragraph 97 of Mr Justice Eady's judgment where 3 he said this: 4 "The real problem, so far as Mr Thurlbeck is 5 concerned, is that these inconsistencies demonstrate 6 that his best recollection is so erratic and changeable 7 that it would not be safe to place unqualified reliance 8 on his evidence as to what took place as between him, 9 Woman E and her husband." 10 Thirdly, turning to the blackmail emails, whether or 11 not Mr Thurlbeck passes them off as written by another's 12 hand, what he can't pass off is the fact, as was 13 evidenced at the trial, that he made two further 14 telephone calls to Woman B subsequent to the emails. 15 Can I just read very briefly from Woman B's 16 evidence? You'll find it -- I'm not sure you have it in 17 the bundles. 18 LORD JUSTICE LEVESON: If I don't have it, I think the 19 better thing, Mr Sherborne, is that you put it in and 20 you put it in as evidence so it is evidenced, and I'm 21 rather concerned, I think, that it ought to be -- 22 MR SHERBORNE: It's an exhibit to Mr Mosley's evidence. 23 LORD JUSTICE LEVESON: If it's exhibited, then I'm very 24 grateful because I want to make sure that everything 25 that is before me is evidence-based. Page 42</p>	<p>1 one of two ways. Either I'm co-operative and my name is 2 blacked out and I get shedloads of money, or if I'm not 3 willing to cooperate, he will show the faces of all 4 girls involved in the newspaper.' I felt this was extra 5 pressure as I was concerned for my friends also. He 6 said the newspaper was going to run another story this 7 coming Sunday. He told me he knew my identity and he 8 would send me pictures of myself. I felt already 9 blackmailed. I will never forget this phone call. 10 "In the afternoon, I received a further email, in 11 which he said, 'Here's the offer. It's £8,000 for an 12 interview with one of you and for anonymity.' I did not 13 reply. I believe that the emails and calls from 14 Mr Thurlbeck were an attempt to blackmail me and put me 15 under pressure." 16 This evidence was not challenged at trial. 17 Finally, I'm not going to deal with Mr Thurlbeck's 18 so-called exposition of the facts which apparently led 19 him to believe in the Nazi theme, despite the glaring 20 inconsistencies in them. They were roundly rejected by 21 Mr Justice Eady, and as you yourself said, sir, 22 Mr Thurlbeck and his legal advisers and the advisers of 23 News International did not think it worthy of an appeal. 24 I'm happy to deal with them if you really wish me to 25 do so, but you may already feel that Mr Thurlbeck's Page 44</p>

<p>1 culture, ethics and practices are abundantly clear.</p> <p>2 LORD JUSTICE LEVESON: Well, I won't respond to the implied</p> <p>3 invitation to identify what I'm thinking. If there is</p> <p>4 anything that you want to put in on this topic --</p> <p>5 perhaps you did some analysis before the final speeches</p> <p>6 in the trial -- you're welcome to do so.</p> <p>7 MR SHERBORNE: Yes.</p> <p>8 LORD JUSTICE LEVESON: But I don't insist upon it.</p> <p>9 MR SHERBORNE: Okay, I'm very grateful.</p> <p>10 LORD JUSTICE LEVESON: Thank you.</p> <p>11 MR JAY: It may be a convenient moment to hear from</p> <p>12 Mr Garnham before we break and then deal with the final</p> <p>13 witness, but we're in your hands.</p> <p>14 LORD JUSTICE LEVESON: Certainly. Yes?</p> <p>15 Submission by Mr Garnham</p> <p>16 MR GARNHAM: Thank you, sir. Sir, you may have seen that</p> <p>17 there were a number of articles in the press over the</p> <p>18 weekend, and in fact again this morning and during the</p> <p>19 course of the day, relating to the evidence you received</p> <p>20 from Mr and Mrs Dowler about the hacking of their</p> <p>21 daughter's mobile phone. Those articles follow the</p> <p>22 submission to your team of a statement prepared by the</p> <p>23 Metropolitan Police and the subsequent disclosure of the</p> <p>24 substance of that statement to Mr and Mrs Dowler's</p> <p>25 solicitor.</p> <p style="text-align: center;">Page 45</p>	<p>1 Whilst in reception of the Bird's Eye building,</p> <p>2 Mrs Dowler phoned Milly's mobile phone again and was</p> <p>3 shocked, she told you, to hear Milly's personal voice</p> <p>4 message instead of the automated mailbox full message.</p> <p>5 Mr Dowler told you she was elated because she thought</p> <p>6 there was a possibility that Milly had accessed her</p> <p>7 voicemail and was alive.</p> <p>8 Mr and Mrs Dowler explained that later on, shortly</p> <p>9 before the criminal trial, they were told that their</p> <p>10 phones had been hacked by Mulcaire and Mrs Dowler made</p> <p>11 the immediate connection with the incident at the Bird's</p> <p>12 Eye building.</p> <p>13 It has been widely reported, both before and after</p> <p>14 the Dowlers gave their evidence to you, that the reason</p> <p>15 Mrs Dowler was able to get through to her daughter's</p> <p>16 voicemail was that Glenn Mulcaire or, alternatively,</p> <p>17 some unidentified journalists, had deleted messages to</p> <p>18 free up space for further recordings.</p> <p>19 On 4 July of this year, the Guardian reported:</p> <p>20 "In the last four weeks, the Met officers have</p> <p>21 approached Surrey Police and taken formal statements</p> <p>22 from some of those involved in the origin enquiry who</p> <p>23 were concerned about how News of the World journalists</p> <p>24 intercepted and deleted the voicemail messages of</p> <p>25 Milly Dowler. The messages were deleted were deleted by</p> <p style="text-align: center;">Page 47</p>
<p>1 The first draft of that statement was sent to Mr Jay</p> <p>2 last Thursday and the final draft on Friday evening.</p> <p>3 LORD JUSTICE LEVESON: I am very conscious, Mr Garnham, that</p> <p>4 you are anxious to make this statement to me, conscious</p> <p>5 that it was likely to enter the public domain very</p> <p>6 quickly.</p> <p>7 MR GARNHAM: Yes, I'm grateful for that indication, sir.</p> <p>8 The articles in the press, although they attempt to</p> <p>9 correct previous errors, are still not wholly accurate.</p> <p>10 May I indicate now where the MPS investigation on this</p> <p>11 issue has got to?</p> <p>12 On 21 March 2002, Milly Dowler went missing.</p> <p>13 According to the witness statement of Sally and</p> <p>14 Bob Dowler at paragraph 14:</p> <p>15 "In or around April or May 2002, [they] went with</p> <p>16 the police to look at CCTV footage of the Bird's Eye</p> <p>17 building in Walton-on-Thames."</p> <p>18 Their evidence, both in their witness statement,</p> <p>19 paragraph 15, and in oral evidence, 21 November,</p> <p>20 page 17, was to the effect that they had been repeatedly</p> <p>21 calling Milly's mobile phone in an attempt to reach her.</p> <p>22 A large number of voicemails had been left so that the</p> <p>23 voicemail box became full. As a result, whenever they</p> <p>24 called her number, they would hear an automated message</p> <p>25 saying that the voicemail box was full.</p> <p style="text-align: center;">Page 46</p>	<p>1 journalists in the first few days after Milly's</p> <p>2 disappearance in order to free up space for more</p> <p>3 messages. As a result, friends and relatives of Milly</p> <p>4 concluded, wrongly, that she might still be alive.</p> <p>5 Police feared evidence may have been destroyed. The</p> <p>6 Guardian investigation has shown that within a very</p> <p>7 short time of Milly vanishing, News of the World</p> <p>8 journalists reacted by engaging in what was standard</p> <p>9 practice in their newsroom. They hired private</p> <p>10 investigators to get them the story."</p> <p>11 Sir, the MPS do not know where the Guardian got this</p> <p>12 information, although that matter is the subject of</p> <p>13 further investigation. Mr Mulcaire has subsequently</p> <p>14 denied deleting voicemail messages from Milly Dowler's</p> <p>15 phone.</p> <p>16 The MPS have been investigating the suggestion that</p> <p>17 Mr Mulcaire deleted voicemail messages on Milly Dowler's</p> <p>18 phone. Although their investigations are not yet</p> <p>19 complete, they are presently able to say this.</p> <p>20 First, the visit by the Dowlers to the Bird's Eye</p> <p>21 building occurred on 24 March 2002.</p> <p>22 Second, Mr Mulcaire was not tasked in relation to</p> <p>23 the Dowlers until some time after that date.</p> <p>24 Third, and accordingly, it's unlikely that anything</p> <p>25 Mr Mulcaire did was responsible for what Mrs Dowler</p> <p style="text-align: center;">Page 48</p>

<p>1 heard when she called Milly's phone during that visit. 2 It is not yet possible to provide a comprehensive 3 explanation for the fact that on that occasion the 4 automated mailbox full message was not heard. It is 5 conceivable that other News International journalists 6 deleted the voicemail, but the MPS have no evidence to 7 support that proposition and current enquiries suggest 8 that it is unlikely. 9 The most likely explanation is that existing 10 messages automatically dropped off from the mailbox 11 after 72 hours. The relevant phone network provider has 12 confirmed that this was a standard automatic function of 13 that voicemail box system at the time. There were 14 approximately 72 hours between Milly's disappearance and 15 the visits to the Bird's Eye building. 16 The MPS, sir, wanted to speak to Mr and Mrs Dowler 17 to provide them with this information. They spoke to 18 the Dowlers' solicitor, Mark Lewis. Mr Lewis thanked 19 the MPS for the approach but indicated that the Dowlers 20 would prefer not to be spoken to by the police at this 21 stage. Mr Lewis was informed of the substance of this 22 statement shortly after it was passed to the Inquiry. 23 Some of the press reports I referred to suggest that 24 the MPS told Mr and Mrs Dowler that News of the World 25 journalists had deleted Milly's voicemail so as to make Page 49</p>	<p>1 says is that currently it's believed that Mr Mulcaire 2 would not have been responsible for those deletions, 3 which led to the voicemails on 24 March, which is the 4 time when Sally, as she gave evidence, felt that false 5 wave of euphoria because she had finally got through to 6 her daughter's voicemails. 7 It is said that that is not the result of 8 Mr Mulcaire because he was not tasked to use 9 Mr Garnham's words until after the 24th. Of course, 10 I believe I understand the basis on which he says that, 11 but it doesn't mean that no one else at 12 News International was responsible, by another means, 13 for accessing those voicemails in that time, and indeed 14 we do know that there was a particular journalist at 15 News International, whose name I will not mention, who 16 was in possession at that time of Milly Dowler's mobile 17 telephone number and pin number, but not through 18 Mr Mulcaire. 19 What we also know is that on 24 March, all of the 20 voicemails in Milly Dowler's mobile phone were deleted. 21 That cannot be, as a matter of technical information, 22 the result of an automatic deletion which takes 72 23 hours, because of course there were voicemails that had 24 been left between the 21st, which is when the 72-hour 25 period starts, and the 24th. As you are recall, Sally Page 51</p>
<p>1 room for other messages. It's notable, I would suggest, 2 sir, that Mr and Mrs Dowler did not say so to you. 3 Furthermore, I can say from MPS records that the 4 Metropolitan Police did not tell the Dowlers that 5 voicemails had been deleted, for the simple reason that 6 they did not know of any such deletions. 7 Sir, thank you for the opportunity to say that. 8 LORD JUSTICE LEVESON: Thank you. It's right to say, isn't 9 it, that Mr Lewis has made a statement which I've seen 10 in the press. I don't know, Mr Sherborne, whether you 11 want to add anything? I then will want to the say 12 something. 13 MR SHERBORNE: Yes, sir, I would want to the add one or two 14 things, both in my capacity as representing Sally and 15 Bob Dowler, and secondly because I have had the benefit 16 of seeing disclosure in relation to this issue in the 17 course of the Chancery Division litigation. I will be 18 careful as to what I say, but there are a number of 19 points that can positively be made. I'm not going to 20 contradict what Mr Garnham says but it is important to 21 set them in context. 22 We do know definitely that News International 23 accessed the voicemails of Milly Dowler and that, as 24 a result, they would have been deleted automatically, 25 even if not deliberately at some point. What Mr Garnham Page 50</p>	<p>1 Dowler gave evidence that she repeatedly called her 2 daughter's voicemail, only to find that it was full. 3 So what we know as a result is that someone was 4 continuing to access that voicemail between the 21st and 5 the 24th and did delete those voicemail messages, which 6 gave rise to Sally Dowler being able, finally, to get 7 through to her daughter's voicemail on 24 March itself. 8 If it wasn't the police, as is said, and it wasn't 9 the family of Milly Dowler, and it wasn't Mr Mulcaire, 10 then with respect, there are only so many culprits. 11 Sir, that is all I have to add. 12 LORD JUSTICE LEVESON: Right. 13 It strikes me that this information is of 14 significance, bearing in mind the importance of the 15 original announcement in the context of the setting up 16 of this Inquiry. 17 What I am keen to understand, therefore, and to 18 think about, is how and in what way the Inquiry should 19 grip this information. I think I am correct in saying 20 that in addition to the Metropolitan Police 21 investigation, which doubtless covers this issue, there 22 is also an investigation being conducted by the IPCC in 23 relation to the Surrey Police end -- because of course 24 we're talking about 2002 -- when it was the 25 responsibility of the Surrey Police to conduct the Page 52</p>

<p>1 enquiry into Milly Dowler's absence. 2 MR GARNHAM: It was. 3 LORD JUSTICE LEVESON: I would like some thought to be given 4 to whether and to what extent it is appropriate for me 5 to look into this issue. I say "whether" because of the 6 ongoing investigation. I say "to what extent" because 7 I would be unhappy if it had to be left to part 2 of 8 this Inquiry to get into the detail, because I would 9 anticipate that the public would want to know what 10 definitively was the upshot of the Inquiry. 11 So what I'd like consideration to be given to is how 12 we should deal with this without in any sense 13 prejudicing ongoing investigations, but in such a way 14 that I can express myself satisfied that I have got to 15 the bottom of what happened. 16 MR GARNHAM: Yes. What I said to Mr Jay was that the 17 Metropolitan Police were anxious that that correction 18 was on the record as soon as possible but it was well 19 understood that you would want this in evidential form 20 at some stage. 21 Accordingly, I suggested to Mr Jay that certainly at 22 least in the first instance, we should give some thought 23 to preparing a witness statement from DAC Akers, who is 24 the senior officer in charge of Weeting, to cover this 25 ground. I'm happy to do that, or if you or Mr Jay think</p> <p style="text-align: center;">Page 53</p>	<p>1 It is not something which the Metropolitan Police knew 2 and that's why it's right that it should be the 3 Surrey Police who provide this material. 4 LORD JUSTICE LEVESON: Thank you. 5 Mr Rhodri Davies, I'm very conscious this must be 6 something of a fast ball? 7 MR DAVIES: Yes, it is. I didn't know these statements were 8 going to be made. 9 LORD JUSTICE LEVESON: What I'm perfectly content for you to 10 do, in the light of what you've heard, is if you and 11 Mr White take instructions and consider the matter. 12 MR DAVIES: Yes. 13 LORD JUSTICE LEVESON: I am absolutely open to suggestions 14 as to the best way of proceeding. 15 MR DAVIES: Yes. 16 LORD JUSTICE LEVESON: I do think it's likely to have to be 17 addressed at some stage. 18 MR DAVIES: Yes. Very well. I'm sure we will co-operate in 19 getting to the bottom of it, but what we don't want to 20 do is to cause any further pain if we can possibly avoid 21 it. 22 LORD JUSTICE LEVESON: Mr Rhodri Davies, I entirely agree. 23 Thank you. The same probably so in relation to the 24 Guardian. Obviously, questions are raised and I'm not 25 for a moment suggesting that I'm going to start</p> <p style="text-align: center;">Page 55</p>
<p>1 an alternative mechanism is more appropriate, we can do 2 what. 3 LORD JUSTICE LEVESON: I'm happy for you to discuss it with 4 Mr Jay. I'm not sure that it can simply involve Weeting 5 and the Metropolitan officers who are concerned with 6 this investigation. It might have to go back to Surrey. 7 I declined their application for core participant 8 status. I don't think that matters. I think it's 9 perfectly feasible for them to put in evidence to such 10 extent as it's felt appropriate for them to do so, but 11 I don't think I can leave it hanging in the air just 12 indefinitely. 13 MR GARNHAM: It hadn't been my intention -- 14 LORD JUSTICE LEVESON: Mr Garnham, I didn't think it was, 15 but I wanted to share with everybody here my current 16 thinking and allow them all to make some short 17 submission about the point and about the way in which 18 I presently am minded to navigate my way through this 19 development in the understanding of what happened. 20 MR GARNHAM: We will take steps. 21 LORD JUSTICE LEVESON: Thank you, Mr Garnham. Mr Sherborne, 22 do you want to say anything about what I've just said? 23 MR SHERBORNE: Not at all. I endorse your approach. I was 24 going to say that it's Surrey Police who know the name 25 of the News International journalist who had the number.</p> <p style="text-align: center;">Page 54</p>	<p>1 requiring identification of sources, but I do think that 2 some thought has to be given to how this picture has 3 been put together so that we can see what actually it is 4 legitimate to say is the proper conclusion to reach 5 about what happened in 2002. 6 Anybody want to say anything else on this topic? 7 Right, we'll give the shorthand writer a break and 8 then we'll come back and hear the last witness. Thank 9 you. 10 (3.20 pm) 11 (A short break) 12 (3.27 pm) 13 LORD JUSTICE LEVESON: Right. 14 MR JAY: The next witness is Mr Wallis, who needs to be 15 sworn or affirmed, please. 16 MR NEIL JOHN WALLIS (sworn) 17 Questions by MR JAY 18 MR JAY: Mr Wallis, sit down and make yourself comfortable 19 and provide us with your full name. 20 A. Neil John Wallis. 21 Q. You have provided a detailed and lengthy statement which 22 runs to 28 pages. It doesn't have a statement of truth, 23 at least the version I've seen, nor has about been 24 signed, but can you confirm, please, that this is your 25 evidence, Mr Wallis?</p> <p style="text-align: center;">Page 56</p>

<p>1 A. Yes.</p> <p>2 Q. May I just confirm one matter. You, I think, have been</p> <p>3 arrested by the police in relation to phone hacking</p> <p>4 issues; is that correct?</p> <p>5 A. Correct.</p> <p>6 Q. As is your entitlement, you do not wish to speak about</p> <p>7 phone hacking matters; is that correct?</p> <p>8 A. Correct.</p> <p>9 Q. So I won't ask you about such matters. Your career</p> <p>10 in --</p> <p>11 LORD JUSTICE LEVESON: Just before you go on, Mr Jay, it</p> <p>12 ought to be said that there has been some observation</p> <p>13 that it's rather odd that hear I am conducting an</p> <p>14 Inquiry that at least has the background of it being</p> <p>15 based in phone hacking and then I am not asking</p> <p>16 questions about that subject.</p> <p>17 I think it has to be understood that the Inquiry,</p> <p>18 which is into the custom, practice and ethics of the</p> <p>19 press, includes phone hacking and other activities but</p> <p>20 the reason the Inquiry has been split into two is</p> <p>21 specifically so that I don't prejudice the investigation</p> <p>22 of criminality, if such there has been, or the potential</p> <p>23 prosecution of those responsible, and by making it clear</p> <p>24 to all those who are involved in that investigation that</p> <p>25 they have their own rights which they're entitled to</p> <p style="text-align: center;">Page 57</p>	<p>1 page 4 of your statement -- I'm just dealing with your</p> <p>2 career, but in 1997 you were head-hunted to become</p> <p>3 editor of the Sunday People; is that right?</p> <p>4 A. End of 1997, early 1998.</p> <p>5 Q. You stayed there for six years until you became deputy</p> <p>6 editor of the News of the World; is that right?</p> <p>7 A. Correct.</p> <p>8 Q. And the editor at that time was probably</p> <p>9 Mr Andy Coulson. Do I have that right?</p> <p>10 A. Correct.</p> <p>11 Q. You stayed there until approximately when, Mr Wallis?</p> <p>12 A. 2009.</p> <p>13 Q. 2009. Then we'll cover your career after that in due</p> <p>14 course.</p> <p>15 So a lengthy history in journalism. You tell us, in</p> <p>16 the first page of your statement, that you gave talks to</p> <p>17 police officers on training courses about police-media</p> <p>18 relations. Can you give us a thumbnail sketch about</p> <p>19 what those courses included, very briefly?</p> <p>20 A. It would be the value of police-media relations, how to</p> <p>21 go about the mechanics of them and why it was worth</p> <p>22 doing.</p> <p>23 Q. Anything about any ethical considerations which might</p> <p>24 arise or not?</p> <p>25 A. No.</p> <p style="text-align: center;">Page 59</p>
<p>1 rely upon, I am not in any sense doing anything that was</p> <p>2 not appreciated from the very outset, or in any sense</p> <p>3 undermining the rights that each of the witnesses has.</p> <p>4 MR JAY: I tried to make that clear in my opening</p> <p>5 submissions but it's been overlooked.</p> <p>6 LORD JUSTICE LEVESON: You did but it's a point that clearly</p> <p>7 needs to be repeated.</p> <p>8 MR JAY: The third bullet point, about eight minutes into my</p> <p>9 opening submission.</p> <p>10 Mr Wallis, if I could first of all ask you to speak</p> <p>11 to your lengthy career in journalism, and if I can seek</p> <p>12 to do it in this way. First of all, you were working in</p> <p>13 Manchester at the Manchester Evening News as a crime</p> <p>14 reporter; is that correct?</p> <p>15 A. Well, I did things before that, but yes, I was a crime</p> <p>16 reporter on the Manchester Evening News.</p> <p>17 Q. Then you moved over to the Daily Star?</p> <p>18 A. Yes.</p> <p>19 Q. From Manchester to London. You were headhunted by the</p> <p>20 Sun in December 1986 and you worked your way up to</p> <p>21 become deputy editor of the Sun; is that correct?</p> <p>22 A. Correct.</p> <p>23 Q. In about 1996, 1997?</p> <p>24 A. Around then.</p> <p>25 Q. You then, if I can move a little bit further forward to</p> <p style="text-align: center;">Page 58</p>	<p>1 Q. Okay. I'm going to take quite a lot of your statement</p> <p>2 as read, Mr Wallis, if you follow me --</p> <p>3 A. I suppose there was an element of -- as part of that,</p> <p>4 saying that there is a virtue in being open with the</p> <p>5 media because the media are your voice to the general</p> <p>6 public, who you look after. So there was some</p> <p>7 discussion like that, why it was right to consider</p> <p>8 police-media relations.</p> <p>9 Q. Okay. I might come back to that later, Mr Wallis. As</p> <p>10 I was saying, I'm going to take quite a lot of your</p> <p>11 statement as read but seek to bring out a number of</p> <p>12 matters, if you permit me to do that.</p> <p>13 A. Okay.</p> <p>14 Q. First of all, the three diagrams which you provided as</p> <p>15 exhibit NW1. The first one is at our page 704.</p> <p>16 A. Uh-huh.</p> <p>17 Q. This is the basic structure, on my understanding, of</p> <p>18 virtually any newspaper one would care to choose and</p> <p>19 perhaps all the newspapers you worked in; is that right,</p> <p>20 Mr Wallis?</p> <p>21 A. I have a very bad copy here. Can you put it -- there,</p> <p>22 it's fine. Yes, sure.</p> <p>23 Q. Is this something you've prepared for us?</p> <p>24 A. Yes.</p> <p>25 Q. Thank you. We can see how it works. I'm not going to</p> <p style="text-align: center;">Page 60</p>

15 (Pages 57 to 60)

<p>1 take time over it. I'd like to take a little bit more 2 time about the next page, 7705. We really need to start 3 at the top right; is that correct? With the tip which 4 starts off the story? 5 A. Yes. 6 Q. Which may go to the news desk. The reporter is 7 assigned. The reporter then works back with the tip. 8 Legal advice is then fed in and then the story is fed 9 back up, is that correct, from the bottom of the middle 10 column to the "Story Produced" box near the top? Do 11 I have that right? Then it starts going left. 12 A. Yes. 13 Q. Unfortunately my copy is not coloured. I don't know 14 whether the -- no. So we can't see the key that you've 15 prepared in colour, but we can work it out perhaps. 16 Maybe we can't. 17 Then the final diagram -- 18 LORD JUSTICE LEVESON: No, no, no, it's not unimportant 19 this. I'm very grateful to you for doing this. It's 20 useful. But can you tell me what's blue and what's 21 purple? 22 A. No. 23 LORD JUSTICE LEVESON: No? 24 A. I just have black and white here as well. 25 LORD JUSTICE LEVESON: No, no, you prepared this document</p> <p style="text-align: center;">Page 61</p>	<p>1 A. Mm-hm. 2 LORD JUSTICE LEVESON: Then also lawyer all the way up round 3 the back to the editor? 4 A. Mm-hm. 5 LORD JUSTICE LEVESON: Right. Thank you. I am going to do 6 this and then I'll give whoever's copy this statement is 7 back again. 8 MR JAY: You might need the next page for internal finance 9 diagram, which I hope is in colour in that version we've 10 just handed you. 07706. 11 LORD JUSTICE LEVESON: Just give me one moment. (Pause) 12 Right. The likely communication is not visible at 13 all. It's from the reporter to the news desk. The news 14 desk to the editor and the rest is all in light blue. 15 Right. Give that back to the gentleman who was kind 16 enough to provide it. Let Mr Wallis see it. (Pause) 17 A. Thank you. 18 MR JAY: Those are your diagrams, Mr Wallis. 19 Return to your witness statement at page 4. You 20 tell us that whilst at the Sun, you conceived the idea 21 of the National Police Bravery awards, which are still 22 in being; is that correct? 23 A. Yes. 24 LORD JUSTICE LEVESON: And that, to be fair, is one of the 25 examples of the real contribution that a tabloid</p> <p style="text-align: center;">Page 63</p>
<p>1 I understand that -- 2 MR JAY: We're going to do better now. 3 A. Could I have a look at it? 4 LORD JUSTICE LEVESON: Yes, please. I was rather making the 5 assumption that as you had prepared it, you would 6 probably know, but -- 7 A. It's some months ago. 8 LORD JUSTICE LEVESON: Oh, fair enough. 9 A. Oh right, yes. 10 LORD JUSTICE LEVESON: Just talk us through it. 11 A. Hold on. There's one -- it hasn't actually appeared on 12 here, hasn't copied onto here. 13 LORD JUSTICE LEVESON: Oh, the colours? 14 A. That's where we might have an issue. 15 MR JAY: I think the yellow is quite faint, so it hasn't 16 come through. 17 A. Yes. (Handed) 18 LORD JUSTICE LEVESON: Thank you very much. Oh, the yellow 19 line is from the news desk down to the lawyer, and from 20 the lawyer to the back bench night editor departments, 21 and it's all blue except for -- 22 A. Those two. 23 LORD JUSTICE LEVESON: The yellow is lawyer to news desk and 24 lawyer to back bench, and the purple is lawyer to 25 subeditor and lawyer to reporter?</p> <p style="text-align: center;">Page 62</p>	<p>1 newspaper has made to the public good? 2 A. I would say so. 3 LORD JUSTICE LEVESON: Well, I'm feeding you the line for 4 you to agree with me. 5 A. I'm glad we agree, my Lord. 6 MR JAY: Thank you. At the bottom of page 4, you deal with 7 the Press Complaints Commission. 8 A. Mm-hm. 9 Q. You were a member of the PCC between, is this right, 10 1997 and 2003? 11 A. Probably 1998 to 2003. 12 Q. When you ceased to be editor, is this right, you came 13 off the PCC but you remained on the Code of Practice 14 Committee? Do I have that right? 15 A. No, I then went to the Code of Practice Committee. 16 Q. In relation to the Code of Practice Committee, who 17 comprises that committee? 18 A. The Code of Practice Committee consists entirely of 19 editors from across the media. 20 Q. The current chair is Mr Dacre; is that correct? 21 A. Yes. 22 Q. Between which dates approximately were you on the Code 23 of Practice Committee? 24 A. From 2003, approximately, until I left journalism in 25 2009.</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)

<p>1 Q. You say in the middle of page 5:</p> <p>2 "It seems to me that at this time in particular, and</p> <p>3 in the wake of the tragic death of Princess Diana,</p> <p>4 national newspapers patently became much more careful</p> <p>5 and considered in their treatment of stories, both</p> <p>6 legally and in regard to the PCC."</p> <p>7 Are you intending to convey by that your view that</p> <p>8 since 1997 or thereabouts national newspapers have</p> <p>9 "behaved" much better?</p> <p>10 A. Certain isolated events apart, I absolutely believe</p> <p>11 that, yes.</p> <p>12 Q. Is this in relation to libel in particular or are you</p> <p>13 also intending to cover privacy matters?</p> <p>14 A. No, libel, as I say, has withered very successfully, but</p> <p>15 post the 1997 election, the legal profession has very</p> <p>16 successfully managed to transfer their interest into</p> <p>17 privacy.</p> <p>18 Q. It makes it sound as if that's been finessed or driven</p> <p>19 by the lawyers, rather than by the market, namely that</p> <p>20 there's been a need for it because of the way newspapers</p> <p>21 have behaved. What are you saying, Mr Wallis?</p> <p>22 A. I'm saying that there has been a change -- as libel</p> <p>23 dropped out, privacy became the field sport.</p> <p>24 Q. The hunter being the lawyer and the hunted the</p> <p>25 newspaper, not the targets newspapers might have; is</p> <p style="text-align: center;">Page 65</p>	<p>1 A. How much of the detail?</p> <p>2 Q. How much the detail were you aware of, of the nature of</p> <p>3 the story, about what the journalist was finding for</p> <p>4 you?</p> <p>5 A. What I can't remember is what I knew at the time because</p> <p>6 it's 11 years ago. What I can say is that it wasn't</p> <p>7 a -- it made itself into a major story. It wasn't</p> <p>8 a major story when it first came on my radar.</p> <p>9 Q. Is this because kiss-and-tell stories of this genre were</p> <p>10 fairly common fare for the Sunday People?</p> <p>11 A. Throughout the popular media.</p> <p>12 Q. Perhaps there was nothing much to distinguish this story</p> <p>13 from the run-of-the-mill kiss-and-tell stories; is that</p> <p>14 correct?</p> <p>15 A. Only from the eventual legal intervention.</p> <p>16 Q. Fair enough. Were you aware -- and this is page 54 of</p> <p>17 the transcript for Day 5 -- that one of the women</p> <p>18 contacted Mr Flitcroft and effectively blackmailed him?</p> <p>19 On his account, which he gave to us, unless he paid</p> <p>20 £5,000, she would go to the press with her story.</p> <p>21 A. Is this the second woman?</p> <p>22 Q. It is, I believe, the second woman, yes.</p> <p>23 A. I don't think I was aware of it literally as it was</p> <p>24 happening. I did become aware of it, but this was --</p> <p>25 had become an issue for me about press freedom rather</p> <p style="text-align: center;">Page 67</p>
<p>1 that right?</p> <p>2 A. No. To be serious, it is evident, I think, that the</p> <p>3 libel -- the amount of libel withered. I think that</p> <p>4 that probably had something to do with newspaper</p> <p>5 realities, looking at the world they were working in,</p> <p>6 and at the same time 1997, of course, brought in the</p> <p>7 Human Rights Act and that opened up a completely new</p> <p>8 field, which was then explored and has developed ever</p> <p>9 since.</p> <p>10 Q. You had a direct involvement in the A v B v C case.</p> <p>11 This is the bottom of page 5 of your witness statement.</p> <p>12 A. Yes.</p> <p>13 Q. Because you, I think, were the editor of the</p> <p>14 Sunday People at the time?</p> <p>15 A. I was.</p> <p>16 Q. Do I have that correct?</p> <p>17 A. Yes.</p> <p>18 Q. Have you seen Garry Flitcroft's evidence in regard to</p> <p>19 that piece?</p> <p>20 A. Yes.</p> <p>21 Q. The transcript is available under our tab 14.</p> <p>22 A. Do you want me to look at it?</p> <p>23 Q. Please. At the time, Mr Wallis, how much were you aware</p> <p>24 of the detail as to how the story was being obtained on</p> <p>25 the ground?</p> <p style="text-align: center;">Page 66</p>	<p>1 than the specifics of this case. This wasn't about</p> <p>2 Mr Flitcroft. It was about what newspapers could or</p> <p>3 couldn't do and if the -- if this was correct -- and</p> <p>4 I reread the judgment last night, and I think the Lord</p> <p>5 Chief Justice at the time said it had been accepted --</p> <p>6 it didn't alter the run of the court case, if you see</p> <p>7 what I mean.</p> <p>8 The second lady came on our horizon long after the</p> <p>9 first injunction.</p> <p>10 Q. It's correct to say that it's not a matter which altered</p> <p>11 the judgment. The Court of Appeal ruled in the</p> <p>12 newspaper's favour?</p> <p>13 A. If she hadn't have -- if Ms D had not appeared, we would</p> <p>14 have continued.</p> <p>15 Q. But it may be quite often a feature of these</p> <p>16 kiss-and-tell stories that their genesis is tied up with</p> <p>17 a blackmail threat to the man involved, because it's</p> <p>18 usually a man involved, the man says no and the woman</p> <p>19 then goes off to the newspaper with the story. That's</p> <p>20 quite a common pattern, isn't it?</p> <p>21 A. I have no knowledge of what you've just said. I accept</p> <p>22 that it is said here and it was accepted in the judge's</p> <p>23 thing, but I have heard on a number of occasions of men</p> <p>24 who are subject or people who are the subject of this</p> <p>25 sort of injunction claiming things like that, and in</p> <p style="text-align: center;">Page 68</p>

<p>1 fact Mr Flitcroft made a similar allegation about the 2 first lady but was never able to produce evidence to 3 verify it. 4 Q. Have I correctly understood your answer: it is then 5 quite a common pattern or allegation that the genesis of 6 this story, as it were, arises in blackmail, but you 7 don't always accept -- 8 A. No, no, I wasn't say that. 9 Q. You wouldn't say that? 10 A. No, no. I'm saying I have heard of examples of it, but 11 in the main, most kiss-and-tells come from a very 12 distressed and angry -- usually angry young woman, who 13 feels that she's been misused in some way and wants to 14 get her own back and then says to herself: "Well, I'll 15 try to make some money off it as well." Revenge is the 16 main motive that I've ever come across in 17 kiss-and-tells. 18 Q. So a mixture of revenge and a financial motive; is that 19 right? 20 A. In the context of revenge and: "He's used me, so 21 therefore why shouldn't I?" and being aware that there 22 is the ability to make money out of newspapers for these 23 sorts of stories. 24 Q. Mr Flitcroft was asked a question about the public 25 interest at page 64 of this transcript, Mr Wallis, Page 69</p>	<p>1 evidence that they both gave, there were striking 2 similarities. To both of them, he'd said that he was 3 single. To both of them, they both thought they were 4 having a relationship with him. Then eventually he told 5 them that he was in fact married. They felt betrayed 6 and abused by him so they got angry and one of the ways 7 that they used to get back was to come and offer this 8 story to my newspaper. 9 Do I think that someone in that position has 10 a public image? Do I think it's of public interest? 11 I agree with the Lord Chief Justice at the time, who 12 agreed to the lift the injunction. 13 Q. Had Mr Flitcroft made any statements about his private 14 life in a public forum? 15 A. It's 11 years ago. I mean, I can't remember the 16 specific detail. But the general position I would have 17 taken at that time was that he was the captain of a top 18 Premiership football team, I think the year before they 19 won the League. You know, they're on television week 20 in, week out. They are role models to my son, you know, 21 who wants to be a football star, and they look up to 22 these people as heroes. 23 Q. Okay, and that's sufficient, in your view, to bring this 24 into the public eye, is it? 25 A. It was not a major story. It became major because of Page 71</p>
<p>1 line 4. The question was: 2 "I think I can probably guess the answer to this 3 question, but do you think it was in the public interest 4 for the Sunday People to tell the world about the fact 5 that you'd had two extramarital affairs? 6 Answer: 7 "No, it was private. It was between me and Karen 8 and there's no reason why my private life should be in 9 the public interest. You know, people -- I was 10 a footballer and the Sunday People printed this story 11 because it was probably interesting to the public, but 12 at the end of the day, it wasn't public interest. If I 13 had been done for match-fixing or taking cocaine, then 14 that's in the public interest." 15 Do you agree or disagree with that? 16 A. Do I agree with Mr Flitcroft? 17 Q. Yes. 18 A. No. 19 Q. Why not? 20 A. He was the captain of a Premiership football team. He 21 was extremely well known. He'd played for Manchester 22 City. He was extremely well-known in the northwest of 23 England. His private life was also known, and the two 24 ladies both wanted to tell their version of how they 25 felt used and abused by him. If you look at the Page 70</p>	<p>1 the legal action that was taken. 2 LORD JUSTICE LEVESON: But the impact on him was major, 3 whether it was challenged by way of injunction or not. 4 The impact on his wife and on his kids was going to be 5 enormous. 6 Now, I can agree there's a balance of the article 10 7 rights of the two ladies. That's a different question. 8 But just focusing on him and his family, the fact that 9 it wasn't a big story to you doesn't say that makes it 10 any less important to justify, does it? 11 A. I understand your point. All I'm saying is that at the 12 time, I thought he was a public figure. The issue of 13 him and his wife were his decision about whether to 14 betray his wife in this way. And, you know, it was -- 15 that wasn't our decision. His private life, in the 16 sense of how he lived his life away from his wife, made 17 the story become known to us because he was very 18 well-known on the scene, if you like, of the northwest, 19 and in my view, as captain of a major premiership 20 football team, I thought he was a role model. 21 LORD JUSTICE LEVESON: I understand the argument and I've 22 read the Lord Chief Justice's view. You make the point 23 in your statement that later judgments in other cases 24 went the other way. 25 MR JAY: It was ultimately, though, your decision which Page 72</p>

<p>1 brought this into the public domain. Had you not made 2 the decision to publish, everything would have remained 3 private as between Mr Flitcroft and the two women 4 concerned, would it? 5 A. Well, obviously I don't know about that, but it would 6 have left a situation whereby a pregnant wife was in 7 ignorance of the fact that her husband was cheating on 8 her. 9 Q. Yes, by definition. 10 Can I move off that topic and maybe ask you whether 11 your view of the public interest balance, which you've 12 clearly explained to us -- whether that's changed in any 13 way since 2002, 2003, when you made relevant decisions 14 in relation to Mr Flitcroft? 15 A. I think that the world has evolved. Yes, I do. 16 Q. And in what way? Which direction? 17 A. I think I'm a realist and I look at what has happened 18 with the law, I look at the privacy adjudications. 19 I think as you look at my entire industry, or what used 20 to be my entire industry, I think there's been a very 21 clear shift away from these sorts of stories to some 22 effect. 23 Q. Is that a shift which you welcome or is it a shift which 24 responded to pressures from elsewhere? How would you 25 analyse it?</p> <p style="text-align: center;">Page 73</p>	<p>1 A. Yes. 2 Q. You suggested that: 3 "... the fact that the code was written for editors 4 by editors should be referred to unqualified as its 5 strength, without referring to perceived weakness. This 6 was agreed." 7 I think you're referring there to the editor's code 8 book, which is an interpretation and expansion of the 9 code. Are you with me? 10 A. Mm-hm. 11 Q. What were you intending to refer to there by "perceived 12 weakness"? 13 A. I think there was an original draft put forward and 14 the -- it was put forward as a debate in that forward, 15 that, if you like, some say a strength of the code is 16 this, some say a strength of the code is that. My view 17 was that the strength of the code was that it was 18 written by the editors and I didn't think that that was 19 a perceived weakness and there's no point of flagging up 20 something that was, you know, questioning the whole 21 point of the exercise, if you see what I mean. 22 Q. Okay. Can I ask you about another meeting, this time on 23 6 April 2009, which is under our tab 10. 24 A. Yes. 25 Q. Page 3168, under the heading "Accuracy", towards the top</p> <p style="text-align: center;">Page 75</p>
<p>1 A. I think that most senior journalists that I know are 2 above all pragmatists and occasionally you get something 3 that you can fight on and you fight on it. If you 4 can't, you get on with your working life and do the best 5 you can. 6 Q. I'm not sure I quite follow the gist of that, Mr Wallis. 7 Could you make it a little more explicit for us? 8 A. It is -- because of the development of privacy, the 9 privacy laws, if you like, it has been much harder to be 10 able to publish those sorts of stories. That's 11 a reality. So as a very hard-working national newspaper 12 journalist, you focus on what is productive rather than 13 banging your head against a wall. 14 Q. Okay. Can I ask you, please, a little bit about your 15 work on the Code of Practice Committee. You tell us it 16 met or meets about six times a year; is that correct? 17 A. I think it's a bit less than that, actually, having 18 revised all these minutes. I think it's about four 19 times a year. 20 Q. Can I ask you about a couple of minutes. First of all, 21 under our tab 5, there's a document which ends with the 22 number 3130. It's a committee meeting on 23 September 23 2004. At the very bottom of 03130, you'll see, under 24 the heading "Specific changes and forward" -- are you 25 with me?</p> <p style="text-align: center;">Page 74</p>	<p>1 of the page. 2 A. Yes. 3 Q. "Obligation of care. Schillings solicitors suggested 4 that the code should state that where there was an 5 intention to publish serious allegations, the relevant 6 parties should be given an opportunity to reply and the 7 gist of their response published. They claimed this 8 reflected PCC policy. The secretary said that in fact, 9 PCC policy was that a failure to give all relevant sides 10 of a story, if unremedied, could lead to a breach. 11 Committee members agreed on the general principle of 12 giving all relevant sides of the story, but felt there 13 were circumstances where there would need to be 14 exceptions. The chairman said these would be difficult 15 to codify. Neil Wallis said that it had always been 16 policy for the News of the World to make a 4 o'clock 17 phone call to the subject of an expose that was now 18 impossible because of the risk of being successfully 19 injunctioned at the hands of Saturday duty judges." 20 Can I just understand the position? Until about 21 what time had it been policy to make that 4 o'clock 22 phone call? Can you help us? 23 A. Probably well into the 1990s and early 2000s. 24 Q. Am I right in saying that that policy, therefore, ceased 25 in the early part of the previous decade? Have</p> <p style="text-align: center;">Page 76</p>

<p>1 I correctly understood what you're saying?</p> <p>2 A. Well, shall I try to explain?</p> <p>3 Q. Yes?</p> <p>4 A. As the success of late-night Saturday injunctions</p> <p>5 increased, for reasons that were subject to debate and</p> <p>6 some discussion in the media and in the legal</p> <p>7 profession, it became clear that whatever the rights and</p> <p>8 wrongs of a case, it was becoming much more easy --</p> <p>9 easier for a judge to grant an injunction.</p> <p>10 If you -- if that injunction was granted, that means</p> <p>11 (a) that you -- all that hard work had to go on hold,</p> <p>12 and (b) it stopped becoming yours, because it then</p> <p>13 became out to the rest of the world. Because if you</p> <p>14 fought the injunction, it would be heard on a nice</p> <p>15 comfortable Thursday or Friday morning in the High Court</p> <p>16 and you, as a Sunday newspaper, have your story all over</p> <p>17 the daily newspapers.</p> <p>18 Q. Right.</p> <p>19 A. And that's quite apart from whether or not you felt the</p> <p>20 injunction was justified, and believe it or not, there</p> <p>21 have been occasions when injunctions have been</p> <p>22 overturned.</p> <p>23 Q. Am I right in saying that it was that consideration</p> <p>24 which, as it were, became overriding and it led to</p> <p>25 a change in policy at News of the World not to make that</p> <p style="text-align: center;">Page 77</p>	<p>1 LORD JUSTICE LEVESON: It's your story. You want to keep</p> <p>2 it.</p> <p>3 A. I'm sorry, I didn't think that was the question he was</p> <p>4 asking me. What I meant was it changed because of the</p> <p>5 practicality and there was no point in bashing your head</p> <p>6 against a brick wall, I guess, which is why you see less</p> <p>7 kiss-and-tell stories.</p> <p>8 Q. In your long experience, is there a correlation between</p> <p>9 publication of exclusive stories and increases in</p> <p>10 circulation or, alternatively, increases in advertising</p> <p>11 revenue?</p> <p>12 A. No. What there is is there are two -- I think I covered</p> <p>13 this in my statement, actually. If you have an</p> <p>14 absolutely massive story, like a world famous footballer</p> <p>15 allegedly having a relationship, that can create</p> <p>16 a spike. Sadly for journalists -- and they find this</p> <p>17 very uncomfortable -- most circulation graphs bump along</p> <p>18 like this. Sadly, most circulation graphs are bumping</p> <p>19 down like this at the moment, but that's a different</p> <p>20 issue.</p> <p>21 The things in truth that create sales -- significant</p> <p>22 sales growth is marketing. So if you look at the great</p> <p>23 success of the 2000s in marketing terms was the Mail on</p> <p>24 Sunday and free CDs. Probably everybody in this room</p> <p>25 somewhere has got a CD for Christmas that came with the</p> <p style="text-align: center;">Page 79</p>
<p>1 4 o'clock phone call, therefore?</p> <p>2 A. "Policy" sounds a bit hard and fast. There was no</p> <p>3 meeting where we all sat down and said, "Right, this is</p> <p>4 what we're going to do." It evolved that way as it</p> <p>5 became clear that it was getting harder and harder to</p> <p>6 get through.</p> <p>7 But the upshot of that, of course, is what I said</p> <p>8 earlier, that because of these difficulties there are</p> <p>9 now far less of these stories appearing because of the</p> <p>10 success of privacy injunctions.</p> <p>11 Q. But if the News of the World weren't making the</p> <p>12 4 o'clock phone call any more, the story would be</p> <p>13 published without the target having the opportunity to</p> <p>14 apply for an injunction and the only remedy now would be</p> <p>15 damages?</p> <p>16 A. Sure.</p> <p>17 Q. That would follow, wouldn't it?</p> <p>18 A. Sure.</p> <p>19 Q. In the end, it was commercial considerations which drove</p> <p>20 the change of policy, wasn't it?</p> <p>21 A. I'm just thinking about your use of the word</p> <p>22 "commercial".</p> <p>23 LORD JUSTICE LEVESON: Well, it's your story. You want to</p> <p>24 keep it.</p> <p>25 A. Pardon?</p> <p style="text-align: center;">Page 78</p>	<p>1 Mail on Sunday. They bump up circulation significantly,</p> <p>2 and what you're trying to do, as a journalist, is so</p> <p>3 that when you went and bought your copy of the Mail on</p> <p>4 Sunday or the Sun or the News of the World that day,</p> <p>5 because it had got Nana Maskouri Sings the Blues, you</p> <p>6 then read the paper and you think, "This is good."</p> <p>7 So you put together a consistently good package, and</p> <p>8 it's that consistently good package you are trying to</p> <p>9 maintain and that's about great stories, exclusive</p> <p>10 stories, hard-hitting material, moving stories, great</p> <p>11 magazines. It's a whole mixture of things. But it's</p> <p>12 very rare, in sad truth, that a great page one goes like</p> <p>13 that.</p> <p>14 Q. But it's part of the mix, isn't it, that a newspaper</p> <p>15 like the News of the World -- and of course, the other</p> <p>16 papers, presumably were the Sun and the Sunday People --</p> <p>17 would be selling exclusive stories which would be of</p> <p>18 interest to the public and would have the tendency, at</p> <p>19 least, to either retain their loyalty to the paper or,</p> <p>20 at best, increase circulation. That's fair, isn't it?</p> <p>21 A. Yes.</p> <p>22 Q. Moving on through your statement, you tell us at the</p> <p>23 bottom of page 7 that you were regarded as a bit of</p> <p>24 a pain in the backside for insisting on adherence to the</p> <p>25 code. There was an adverse ruling by the PCC in</p> <p style="text-align: center;">Page 80</p>

<p>1 relation to the TV serial, a finding that that was 2 a fishing expedition.</p> <p>3 At the top of page 8, which is 07682, the editor 4 instructed, at your instigation, that there must always 5 be a written memorandum spelling out the specific 6 reasons for suspicion before you carried out any such 7 investigation in future. To your knowledge, was that 8 policy, the need for a written memorandum, abided by or 9 not?</p> <p>10 A. I believe it was. I believe that what it successfully 11 did was to stop the fishing expeditions.</p> <p>12 Q. Would there be, for example, a series of written 13 memoranda somewhere which evidenced the basis of 14 suspicion in each case before starting on an 15 investigation?</p> <p>16 A. No, sorry, that's not what I said. What I meant was 17 this was an example of -- it was a Christmas party that 18 they knew about and so they went along on the off-chance 19 that they could spot any mischief. They were found 20 against by the PCC and effectively what that did was it 21 was a way of policing to make sure that that sort of 22 cold calling, if you like, that sort of fishing 23 expedition stopped.</p> <p>24 So if somebody had a -- I don't remember an example 25 again, shall we say, of someone coming and saying,</p> <p style="text-align: center;">Page 81</p>	<p>1 then the message, is this right, was disseminated down 2 through the departmental heads and checked and policed 3 by them and the legal heads. What do you mean by "the 4 position of the paper was made known", Mr Wallis?</p> <p>5 A. We didn't want to fall foul of either legal problems or 6 the PCC. An editor is not going to survive very long if 7 he has a series of legal judgments against him. 8 An editor is not going to survive very long if he has 9 a series of PCC adjudications against him. It costs 10 money. Fighting a legal case is extremely expensive. 11 Who needs that? Who needs the problems of that? It 12 just doesn't make sense, so what you plainly try to do 13 is to say, "I don't want to risk either libel or privacy 14 or the law or the PCC unless it's a conscious decision 15 by me."</p> <p>16 Q. Beyond that, namely the common sense wish not to travel 17 outside the law in all its various manifestations, were 18 there any systems in place to ensure that journalists 19 adhered to these principles?</p> <p>20 A. With respect, it was more than just a common sense 21 thing. It was a very active view from the senior 22 executives. In terms of practical systems, do you mean 23 in a sense of -- I don't know, in the FSA, that sort of 24 thing, do you mean?</p> <p>25 Q. Maybe not quite as regimented as that. When one's Page 83</p>
<p>1 "We've heard that the Inbetweeners' Christmas party is 2 going to be full of heroin-injecting lunatics." It 3 didn't happen. It just sort of went away then. It was 4 a way to say, you know --</p> <p>5 Q. Because it would be a fishing expedition?</p> <p>6 A. Precisely.</p> <p>7 Q. Turning it the other way around, if you didn't think 8 there was a fishing expedition, there would be a written 9 memorandum evidencing the suspicion. Were there ever 10 any such memoranda?</p> <p>11 A. I can't remember. I'm sorry, it's a long time ago.</p> <p>12 Q. Can I ask you, please, about corporate governance. Am 13 I right in saying that your evidence on this issue is 14 that corporate governance was what the departmental 15 heads decided in individual cases; is that correct?</p> <p>16 A. I think it's more subtle than that. It was made known 17 very clearly from the top, the position of the paper. 18 It was then that we had highly experienced, very able 19 departmental heads working in conjunction with the legal 20 department, whose job it was to go away and bring us 21 stories. And they would bring us stories that would 22 say, "We're happy that this is accurate. We're happy 23 it's legally fine and PCC fine."</p> <p>24 Q. Let me see if I can unpick that a little bit. The 25 position of the paper was made known at the very top and</p> <p style="text-align: center;">Page 82</p>	<p>1 talking about corporate governance, one is usually 2 talking in terms of systems which would be a system of 3 dissemination of information, quite often usually in 4 written form, and a system of oversight, which would be 5 reasonably formulaic.</p> <p>6 A. So we made sure, for instance -- I remember at one 7 point, for instance, we sent a copy of the PCC code to 8 every single reporter, to their home address. Another 9 time -- by the time I was on the Code Committee, we sent 10 a copy of the PCC handbook to every member personally at 11 their home -- every staff member personally at their 12 home address.</p> <p>13 The senior executives -- it was made constantly 14 clear to them exactly where the paper stood, and it 15 wasn't in any way secretive. It was very well-known 16 that we were not interested in the idea of breaking the 17 law or of breaching the PCC or risking libel claims or 18 spending a load of money on privacy laws battles. It 19 just -- occasionally we would look at something and make 20 a decision. Sometimes we would think, "Yeah, this is 21 worth taking the law on, yeah."</p> <p>22 Q. Okay. May I ask you about ethics then, which is 23 page 7685.</p> <p>24 A. Sorry, I'm lost.</p> <p>25 Q. Page 11 on the internal numbering.</p> <p style="text-align: center;">Page 84</p>

21 (Pages 81 to 84)

<p>1 A. Oh yes.</p> <p>2 Q. You start off by asking a series of questions. "Is this</p> <p>3 story accurate?" Here, of course, you're dealing</p> <p>4 primarily with libel issues and also paragraph 1 of the</p> <p>5 PCC code, aren't you?</p> <p>6 A. Yes.</p> <p>7 Q. "Is it right to print?" Well, what do you mean by that?</p> <p>8 A. Again, in relation to the PCC code, but also in relation</p> <p>9 to: will this story do more harm than good?</p> <p>10 Q. To whom?</p> <p>11 A. To the subjects or to the institution or whatever.</p> <p>12 Q. Of course, the subjects and those around the subjects,</p> <p>13 usually the family of the subjects, will always be</p> <p>14 harmed by privacy stories, won't they? Almost always,</p> <p>15 anyway.</p> <p>16 A. I don't think that's a -- I think there's an impact,</p> <p>17 yes.</p> <p>18 Q. The next question you pose: "Could someone be wrongly</p> <p>19 damaged by publishing?" Could you give me examples.</p> <p>20 What do you mean by "wrongly damaged" there?</p> <p>21 A. Yes, I remember a -- I was editing the Sun one day on</p> <p>22 a Sunday and we had a story about a major captain of</p> <p>23 industry and his personal life and the guy rang me and</p> <p>24 we had a conversation and I made a decision that it</p> <p>25 would be wrongfully damaging and I didn't run it. I've</p> <p style="text-align: center;">Page 85</p>	<p>1 Q. You bring to light a specific type of case, which many</p> <p>2 others, of course, have done on the next page, 7686.</p> <p>3 Just above the first hole punch, the heading "Financial</p> <p>4 commercial pressures".</p> <p>5 You say:</p> <p>6 "There are too many instances to recall of</p> <p>7 politicians or celebrities who have built careers around</p> <p>8 a false public image when, in reality, their private</p> <p>9 life is starkly different."</p> <p>10 Are you referring there to false public images which</p> <p>11 are expressly created; in other words, they're express</p> <p>12 statements or representations made by the politicians or</p> <p>13 celebrity, or are you referring to cases where you can</p> <p>14 infer, deduce or imply a public image because of</p> <p>15 a public position which someone might occupy?</p> <p>16 A. I'm not totally sure of the difference between you the</p> <p>17 two. Could you explain?</p> <p>18 LORD JUSTICE LEVESON: Let me put it this way. You will</p> <p>19 remember, I have no doubt at all, the then-Conservative</p> <p>20 government ran a Back to Basics policy and it became</p> <p>21 open season on any politician who had allied themselves</p> <p>22 to that campaign about whose private life the press had</p> <p>23 some other information, and they were all collected</p> <p>24 together by Mr Matthew Paris in his book, Great</p> <p>25 Parliamentary Scandals. But do you think that simply</p> <p style="text-align: center;">Page 87</p>
<p>1 done that on a case of someone whose child, I remember,</p> <p>2 was in a severe mental -- severe health condition and it</p> <p>3 would have tipped the child over the edge.</p> <p>4 Q. Of course, as soon as you embark on that line of inquiry</p> <p>5 in an individual case and receive more information,</p> <p>6 you're lying to receive evidence of impact as an editor</p> <p>7 which might well cause you not to publish the story, but</p> <p>8 that's not usually an inquiry that's undertaken, is it?</p> <p>9 A. I'm sorry, I didn't understand that.</p> <p>10 Q. As soon as you do start to embark upon a line of</p> <p>11 enquiry, either proactively or someone phones in and</p> <p>12 explains the likely impact on them, you are likely to</p> <p>13 receive information which is going to cause you to</p> <p>14 hesitate about publication because human nature being as</p> <p>15 it is, publication of stories about privacy will always</p> <p>16 have a deleterious impact somewhere, won't they?</p> <p>17 A. It would make you think, yes.</p> <p>18 Q. But did it ever make you think more generally,</p> <p>19 Mr Wallis?</p> <p>20 A. I've been dealing with these sorts of stories for 20-odd</p> <p>21 years. Of course I think about it.</p> <p>22 Q. Yes, and are you suggesting that there was ever much</p> <p>23 hesitation in your mind because of the possible human or</p> <p>24 the probable human --</p> <p>25 A. It's a balance you make, yes.</p> <p style="text-align: center;">Page 86</p>	<p>1 because somebody is an MP that inevitably means that the</p> <p>2 public interest permits you to publish details of their</p> <p>3 private life?</p> <p>4 A. I don't think it's quite as black and white as that, but</p> <p>5 I do believe that if you put yourself forward for me to</p> <p>6 elect you and you sell yourself to me, then I probably</p> <p>7 have the right to know an awful lot about you.</p> <p>8 LORD JUSTICE LEVESON: What about if you put yourself</p> <p>9 forward as the editor of a newspaper?</p> <p>10 A. I didn't put myself forward to you. I put myself</p> <p>11 forward to the proprietor.</p> <p>12 LORD JUSTICE LEVESON: But you're encouraging the public to</p> <p>13 buy your papers.</p> <p>14 A. That's completely different, isn't it? I do not --</p> <p>15 Lord Leveson decides he wants to become the MP for</p> <p>16 Wigan. You go out there and you say to the people of</p> <p>17 Wigan: "Elect me for this, this, this, this and this</p> <p>18 reason", and 56,000 people out there decide that based</p> <p>19 on what you have told them, that you are just the fellow</p> <p>20 for them.</p> <p>21 It's a heck of a difference from whoever owns the</p> <p>22 Wigan Observer, which does exist, actually saying, "You</p> <p>23 know what, he's a very good journalist, him. I'm going</p> <p>24 to make him the editor." And yes, I talk to them, but</p> <p>25 they can reject me every single day, can't they, whether</p> <p style="text-align: center;">Page 88</p>

<p>1 they spend their 50 pence or whatever. They can choose. 2 They can vote with their 50 pence or a pound. All I'm 3 saying, sir, is that if you choose, you elect to go and 4 get elected, then I think you've chosen to put yourself 5 in a public position and I think that -- I was warned 6 I mustn't pontificate like this, so apologies, but 7 I genuinely believed that when someone is elected, they 8 elect great parts of you. They want to the know you, 9 which is why it's interesting, isn't it, how MPs who do 10 get themselves in a scandal are treated by their 11 constituents later. 12 LORD JUSTICE LEVESON: Sometimes. 13 A. Sometimes. 14 LORD JUSTICE LEVESON: But you said just a few moments ago 15 that it's not as black and white as that. 16 A. No, exactly. 17 LORD JUSTICE LEVESON: The story you've just given me, the 18 account you've just given me, suggests it's very black 19 and white. Once you say, "My name is going on the 20 ballot paper", that's it. I'm only trying to find out 21 where the balance lies. 22 A. With respect -- 23 LORD JUSTICE LEVESON: That's all right. 24 A. I've had -- 25 LORD JUSTICE LEVESON: That doesn't normally mean that,</p> <p style="text-align: center;">Page 89</p>	<p>1 the Guardian. It's losing £30,000,000 a year. Its 2 circulation is in free fall and it has this amazing 3 website. They're wrestling with how to translate 4 putting all their efforts into the website while 5 surviving with the printed version and whether that 6 printed version of the Guardian will still exist in five 7 years time, it's extremely hard to debate. 8 The issues of advertising revenue, of circulation 9 revenue, are all absolutely terrifying at the moment and 10 there are some great newspapers that are going to fold, 11 and it's very interesting because what you might see is 12 newspapers being bought up more and more as ego vehicles 13 for very, very rich people who will use them as their 14 play thing. 15 LORD JUSTICE LEVESON: I recognise that's a very important 16 point and that's one of the issues that was addressed in 17 the seminars, and the impact of the Internet on print 18 media and the way in which the print media should 19 position themselves to cope with the constant 24/7 20 availability of information, whether it is always 21 factually accurate or not but that is available on the 22 Internet, is a very real one. Nobody has yet suggested 23 a particular way forward for that. 24 A. That may be because it hasn't appeared yet, but sir, can 25 I just say this to you? If you put together the</p> <p style="text-align: center;">Page 91</p>
<p>1 Mr Wallis. 2 A. Yeah, I know. Yeah, with respect, I remember some years 3 ago being told some stories about a very, very famous 4 public figure. Delightful person, and essentially the 5 suggestion was that this person had a very, very severe 6 drink problem. So we looked into it and this person in 7 fact had a very serious illness. Now, eventually the 8 person chose to make that public, but we and most of the 9 rest of the media knew about it for a long time while 10 that person continued in public office. 11 You make decisions depending on what you know and 12 what the circumstances are and how you read it. Do 13 I have a lot of problems with a married MP with 14 a family, who then, it turns out in his private time, 15 that he runs around and pays rent boys? I'm afraid 16 I see that as being in the public interest and fully 17 acceptable to report it. 18 MR JAY: Okay. The section on financial and commercial 19 pressures I think you've covered, save to this minor 20 extent, that would you agree that the pressures on 21 newspapers have increased as the market has dwindled for 22 newspapers generally? 23 A. I think the financial pressures on newspapers and the 24 media are simply appalling now, and I think it's an 25 absolute dilemma. You look at a great newspaper like</p> <p style="text-align: center;">Page 90</p>	<p>1 circulations of the Guardian, the Independent, the Times 2 and the Daily Telegraph combined, that does not go 3 anywhere near matching the Sun's daily circulation. 4 LORD JUSTICE LEVESON: Yes, I've said that a few days ago. 5 A. The chosen newspaper of this country is the Sun and the 6 red tops. The Great British population do not want the 7 broadsheets. Not only that; the Telegraph makes money. 8 Yes, thank goodness. Neither the Times, the Guardian, 9 the Independent or Sky News and certainly not BBC News 10 channel or the parliamentary channel -- none of those 11 makes money. And at the bottom line, if you're going to 12 leave this country with a media, sir, I think that it 13 needs to be recognised that the bits which are still 14 clinging to profit are the ones the people out there 15 want to read, and they voted with their pound coins, 16 et cetera. 17 LORD JUSTICE LEVESON: But is that an argument for saying, 18 "We have to be allowed to infringe people's privacy and 19 to do these things which actually are coming up with all 20 these criticisms because that's the only way we'll get 21 people to buy papers" ? 22 A. I'm not saying that at all. 23 LORD JUSTICE LEVESON: But isn't that the consequence of 24 what you're saying? 25 A. Sorry, I was going on to say --</p> <p style="text-align: center;">Page 92</p>

<p>1 LORD JUSTICE LEVESON: Yes? 2 A. It isn't at all the consequence of what I'm saying. 3 I suppose what I'm saying is that there is plainly an 4 issue that has had to be addressed. Whether or not it 5 is on the scale that requires this, considering the 6 changes that have been in newspapers in my lifetime is 7 an extremely interesting question, and particularly the 8 way those newspapers that have been targeted by this 9 Inquiry are trying to survive, have altered to survive, 10 and the danger of "be careful what you wish for". 11 MR JAY: I move on to a separate topic now, Mr Wallis. I'm 12 hoping to take this one largely as read. Budget, which 13 starts at 07687. 14 A. Yes. 15 Q. We've heard from Mr Thurlbeck the quite substantial sums 16 which are paid for kiss-and-tell stories. Can 17 I understand this: that those would require, would they 18 not, at least the authorisation of the departmental 19 head, if not the editor. We're talking at a sum of -- 20 A. What level of figures? 21 Q. -- apparently an average of £15,000, but could go 22 substantially above that, depending on where the story 23 is going to be placed and the nature of the story? 24 A. I'm sorry, I'm not totally sure what the question is 25 you're asking me.</p> <p style="text-align: center;">Page 93</p>	<p>1 Q. Can I move off that to expenses and Mr McMullan's 2 evidence. 3 A. Yes. 4 Q. My question was: have you had the chance to look at his 5 evidence or -- 6 A. Unfortunately I watched it. 7 Q. The picture that he gave of the culture of the 8 News of the World at a certain time, was that one which 9 you found familiar or unfamiliar? 10 A. Can I just say that McMullan left the News of the World 11 quite some time before me. I think that he -- I think 12 McMullan left -- was it in 2000 or 2001? I don't know. 13 And I arrived in 2003. I don't know whether he 14 explained the circumstances of how he left the 15 News of the World or how he left his next job or how he 16 left his next job, and he's now running a pub in Dover 17 or somewhere. All I'm saying is I arrived after 18 Mr McMullan worked at the News of the World and I did 19 not recognise in any way his description. 20 Q. He said it was quite common practice to overegg one's 21 expenses claims because, after all, the levels of 22 salaries were not particularly high. Is that something 23 you would disagree with or not? 24 A. I thought he was quite well paid for what he was, to be 25 honest. I think it would be true to say that newspaper</p> <p style="text-align: center;">Page 95</p>
<p>1 Q. Well, if we're talking about a kiss-and-tell story which 2 would cost £15,000, that would require editorial 3 approval, would it not? 4 A. Oh yes. 5 Q. Can I ask about the expenses culture. Have you had the 6 chance to have a look at Mr McMullan's evidence to this 7 Inquiry? 8 A. Sorry, can I just backtrack on something. We talk a lot 9 here about kiss-and-tell. I think if you look back at 10 the newspapers over the last decade, the numbers of 11 kiss-and-tells I think have fallen dramatically. 12 Q. I think you did make that clear earlier. 13 A. It's just you mentioned the word kiss-and-tell again. 14 You see, for instance, I remember paying something like 15 £15,000, say, for a video some soldiers in Iraq who had 16 dragged some young rioting kids off the street and 17 they'd dragged them into a compound and proceeded to 18 beat them to a pulp. I remember we paid something like 19 £15,000 for that. We paid large amounts of money. 20 I remember there was another military-linked one that 21 was a beating of an initiation ceremony. We spent an 22 awful lot of money on that. I wouldn't like you to 23 think that all tabloid investigations, that all tabloid 24 expenditure is about kiss-and-tells. Of course some of 25 it is.</p> <p style="text-align: center;">Page 94</p>	<p>1 journalists are not unknown to be creative in their 2 attempts at their expenses sheets. However, an earlier 3 witness mentioned an esteemable man called Stuart 4 Kuttner, who did not allow anything like that. He was 5 scary. 6 Q. It's implicit in that answer that Mr Kuttner would know 7 in any given case what he was authorising. Would you 8 agree with that? 9 A. He would know -- if someone presented an expenses sheet 10 in front of him that did not look to him to be accurate, 11 he would query it, yes. 12 Q. You, though, permanently were not involved with 13 budgetary matters until 2008. You tell us that on 14 page 17 on the internal numbering. Is that correct? 15 A. Yes. 16 Q. Can I ask you about the issue of freelancers at 17 page 7692, page 18. 18 A. Yes. 19 Q. The papers on which you worked, in particular the last 20 one, can you give us a sense of the extent to which 21 reliance was placed on freelancers as opposed to 22 established members of staff? 23 A. Sorry, do you mean on the News of the World, the last 24 one on this page? 25 Q. The News of the World.</p> <p style="text-align: center;">Page 96</p>

<p>1 A. On the News of the World. I think a lot was placed on 2 freelancers for tips.</p> <p>3 Q. Tips rather than the stories which might have flowed 4 from the tips; is that correct?</p> <p>5 A. It would depend, really, on who the freelance was, how 6 well we knew them. So, for instance, you know, an 7 agency like Mercury Press in Liverpool has worked with 8 all the national newspapers for donkey's years, and if 9 they came up with a story, you would be, in the main, 10 quite happy for Mercury Press to work on it because you 11 knew Chris Johnson, you knew how straight and reliable 12 he was.</p> <p>13 Other people you would know but perhaps might not 14 know as well as Chris Johnson, so you might send your 15 own staffer up there and simply treat it as a tip. 16 Sometimes you would use Chris Johnson, you know, 17 depending what it was.</p> <p>18 Q. So you say the freelancer would provide the tip and that 19 would be the spur to the story but not the story itself. 20 Have I correctly understood it?</p> <p>21 A. In the main, yes. If it's a hard news event -- car 22 crash on the M62 -- then plainly, that's 23 a straightforward news event. But very often 24 a freelancer would be the generator of a tip.</p> <p>25 Q. Once the tip is generated -- and you cover this more</p> <p style="text-align: center;">Page 97</p>	<p>1 Q. Can I ask you about some specific stories which this 2 Inquiry has been looking at during your time at the 3 News of the World. First of all, the story in relation 4 to Kate McCann's diaries. Were you involved in that in 5 any way?</p> <p>6 A. No.</p> <p>7 Q. Were you involved in any aspect of the McCann case? Can 8 you recall?</p> <p>9 A. Only initially in the sense of when it happened, I was 10 still the deputy editor then, so I was obviously 11 interested in what are we doing, what are the stories, 12 where is it going, et cetera, et cetera. It's a big 13 breaking news story.</p> <p>14 Q. Were you involved at all in the Max Mosley story?</p> <p>15 A. No.</p> <p>16 Q. Bear with me one moment while I check one reference. 17 (Pause) Were you involved at all in any of 18 Mr Mazher Mahmood's stories?</p> <p>19 A. Some of them, yes.</p> <p>20 Q. Maybe you covered these at page 7695 the, page 21. The 21 dirty bomb plot, were you involved in that?</p> <p>22 A. Yes, I was, yes.</p> <p>23 LORD JUSTICE LEVESON: At that time, was there a practice of 24 requiring some audit trail to justify the story being 25 pursued in writing?</p> <p style="text-align: center;">Page 99</p>
<p>1 generally at page 07693, second paragraph on the page, 2 page 19 on the internal numbering -- you would be 3 dealing with the offering up of material, whether it be 4 by freelance journalists, an agent, a PR or a special 5 interest group. Are you with me, Mr Wallis?</p> <p>6 A. Yes.</p> <p>7 Q. How does it work? The tip is provided, the material is 8 offered up, however you want to describe it, and then 9 a staff journalist would write up the story; is that 10 correct?</p> <p>11 A. No, I wouldn't have thought so. You offer me a tip. 12 I decide I'm interested in it. I then task a reporter 13 to go and make that story work, see if that story will 14 work.</p> <p>15 Q. It's your first diagram, isn't it?</p> <p>16 A. Yes, precisely.</p> <p>17 Q. Which we looked at earlier. So are you saying there's 18 always a process of verifying the story as it moves 19 forward?</p> <p>20 A. From a freelancer, yes. Very rare that you would -- you 21 know, please don't misunderstand me. There's, you know, 22 a very well-known freelancer based in Germany called 23 Alan Hall, who has an enormous reputation. And if Alan 24 Hall filed you a story, you would think: "Oh, that's 25 pretty secure. That's Alan Hall."</p> <p style="text-align: center;">Page 98</p>	<p>1 A. I don't think so. Sorry, how do you mean, an audit 2 trail?</p> <p>3 LORD JUSTICE LEVESON: Well, I'm actually asking about the 4 extent to which you ensured that there was an evidence 5 base for the public interest in pursuing particular 6 stories so that if anybody ever questioned them, you 7 could demonstrate that they weren't fishing but were 8 based upon material that you had available.</p> <p>9 A. On the dirty bomb plot, as soon as we got this tip-off, 10 realised the person was serious, the first thing we did 11 was sit down and agree to call in Scotland Yard straight 12 away, because although I think someone made some sort of 13 negative comment about it the other day, that was an 14 investigation that almost from the off was actually run 15 by Scotland Yard, and our investigators became 16 effectively tools at the hands of the anti-terrorism 17 branch, and everything they did was done with the 18 evidential needs of Scotland Yard rather than ourselves. 19 And of course, it did go to a trial. Yes, it was the -- 20 the charge was dismissed, but the decision to go to 21 trial was by the CPS and the anti-terrorism branch.</p> <p>22 LORD JUSTICE LEVESON: I wasn't necessarily asking 23 specifically in relation to that case. I'm talking 24 about generally.</p> <p>25 A. No, I don't think so. There would be working emails</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 flowing around or working memos, but not as a plan, if 2 you like, to have a procedure. An automatic procedure. 3 MR JAY: You tell us in relation to -- this is all under the 4 heading "Police", isn't it? I'm on page 7696, the 5 internal numbering page 22. Four lines down, you say: 6 "These successes results from longstanding, 7 established relationships between police and 8 journalists, usually at senior levels and with 9 a substantial element of trust." 10 Can you tell us, please, about how those 11 relationships between police and journalists were 12 fostered? 13 A. Same way as relationships were fostered between 14 journalists and politicians, journalists and lawyers, 15 journalists and civil servants. You came across these 16 people, you got to know them, you grew to trust each 17 other. You, to some extent, co-operate because you are 18 playing in the same ballpark. 19 Q. As you made clear in the context of politicians, there 20 would be hospitality shared between the police and 21 journalists. Is that correct? 22 A. Hospitality shared between police and journalists? 23 Q. Yes. 24 A. Press and journalists, judges and journalists, civil 25 servants and journalists. That's what we do.</p> <p style="text-align: center;">Page 101</p>	<p>1 A. I've spent 30 years at the top of mass media 2 communication. I know how to reach an audience. I know 3 how to get in touch with people out there. That's 4 a useful skill. 5 Q. I now refer you to an article in the Daily Telegraph, 6 which is in our tab 20. It's the one after the contract 7 between Shami Media Limited and Metropolitan Police 8 Authority, which I'm not going to go to. It's headed 9 "Phone hacking -- Neil Wallis given Met role after 10 undercutting rivals". Do you see that? 11 A. I'm not sure what number it is. I have seen that 12 somewhere -- 13 Q. It's the last tab in the bundle. 14 A. Hang on, yes. Which one? 15 Q. It's an article -- 16 A. Yes. 17 Q. -- in the Telegraph. 18 A. Yes. 19 Q. The article says: 20 "Neil Wallis, who had dined with the Commissioner on 21 eight occasions in the three years before he won a 1,000 22 a day contract at Scotland Yard, was given the job after 23 undercutting rival bids from two other communications 24 firms." 25 First of all, is it factually correct that you had</p> <p style="text-align: center;">Page 103</p>
<p>1 Q. The consideration would be limited to hospitality. By 2 "consideration", I mean the payment, would it be limited 3 to hospitality or not? 4 A. (Shakes head) 5 Q. You may not like to answer that. 6 A. No, not at all. I've never heard of either 7 a politician, a policeman, a civil servant or a lawyer 8 wanting me to pay them for information. 9 Q. You've never heard of that? 10 A. Oh, I hear rumours. We all hear sort of gossip, but 11 whether or not in my professional life I think I've ever 12 actually been seriously asked by somebody: "Will you 13 give me some money for ..." from somebody like that, 14 then I don't believe so. 15 Q. After you left the News of the World, you, through 16 a company called Shami Media, provided PR advice to the 17 police; is that correct? 18 A. Yes. 19 Q. What sort of advice did you provide through your 20 company? 21 A. I provided expert knowledge, some speech-writing, some 22 guidance about the public perceptions, anything they 23 wanted to ask me, basically. 24 Q. What do you mean by "expert knowledge" in that context, 25 please, Mr Wallis?</p> <p style="text-align: center;">Page 102</p>	<p>1 dined with the Commissioner on eight occasions in the 2 three years before 2009? 3 A. The Met says it is, so I'm sure it's right. 4 Q. It may be suggested here that it is News International's 5 relationship with the police which in some way gave you 6 a fillip in getting the job. 7 A. No. 8 Q. Why do you say that so firmly, Mr Wallis? 9 A. It had nothing to do with News International. It had 10 everything to do with me. 11 Q. Okay. You worked for them, I think, for nine months or 12 so; is that correct? 13 A. A year, I think. 14 MR JAY: I've not covered every point in your witness 15 statement, having regard to the time and everything 16 else, but those all the questions I have for you, 17 Mr Wallis. 18 I don't know whether there may be any others. 19 LORD JUSTICE LEVESON: I have one. 20 Thank you for the part of your statement that makes 21 a number of recommendations, which I shall consider with 22 some care, but I'd just like to ask you to look at 23 paragraphs 4 to 6, which are on page 26 -- 7700 is the 24 number -- where you're talking about the PCC. 25 A. Yes.</p> <p style="text-align: center;">Page 104</p>

<p>1 LORD JUSTICE LEVESON: You speak about the vital requirement 2 that self-regulation continues and you identify the 3 funding problems, which I recognise. But then in 5 and 4 6 you speak about, first of all, the right effectively 5 to subpoena, and secondly the requirement of compulsion 6 for members of the PCC.</p> <p>7 I'd just like to ask you whether you see a conflict 8 in those requirements or whether you identify the 9 possibility that there can be self-regulation by the 10 media involving independence, by editors and 11 journalists, involving independent people, of course, 12 but that the requirement that something sits behind that 13 which provides for the compulsion in paragraph 6 and the 14 powers in paragraph 5 is consistent with that 15 self-regulatory model?</p> <p>16 A. It seems to me that -- my main point, sir, is the 17 opening few words of number 4. It's vital that 18 self-regulation continues. It seems to me that to do 19 that, the media, which is already under tremendous 20 financial pressure, needs to find -- even however hard 21 it is, needs to find the money to make number 5 22 possible, and I think that's as very expensive thing 23 that I'm asking for there.</p> <p>24 I think that number 6 is similarly essential, and 25 I have no doubt that there is sufficient brains in this</p> <p style="text-align: center;">Page 105</p>	<p>1 A. Because if it was, then part of the requirement to get 2 that licence, as it were, would be membership of the 3 PCC.</p> <p>4 LORD JUSTICE LEVESON: Yes, but the real problem about 5 licensing is that then somebody's going to say, "You 6 can't licence journalists."</p> <p>7 A. I'm not suggesting that at all.</p> <p>8 LORD JUSTICE LEVESON: I know you're not.</p> <p>9 A. Trust me, because that is a classic example of --</p> <p>10 LORD JUSTICE LEVESON: I understand. I've spoken about this 11 already in exchanges with different witnesses. I don't 12 think that's the route at all. But it's how it will all 13 work together.</p> <p>14 A. I mean, I appreciate your position, because the logical 15 corollary of what you're saying is licensing of 16 journalists. Licensing the newspapers is similar.</p> <p>17 LORD JUSTICE LEVESON: That's the point.</p> <p>18 A. Yes, I do see that, but I think that for you, going 19 forwards, if I may be so bold, there has to be some sort 20 of development, and I have to say that I think both of 5 21 and 6 are useful ways forward, in the same way that 22 I think 7 that I've read in some supposedly intelligent 23 places is simple wholly impractical.</p> <p>24 LORD JUSTICE LEVESON: I understand the problem, but I just 25 wanted to give you the opportunity to develop the links</p> <p style="text-align: center;">Page 107</p>
<p>1 country to find the way to say that self-regulation and 2 5 and 6 are not mutually impossible.</p> <p>3 I absolutely do not believe -- sorry, turn it around 4 the other way. I absolutely believe that the day there 5 is any kind of statutory control over the media in this 6 country is a disaster and it comes back to the classic 7 "be careful of what you ask for". But I do believe that 8 the PCC can be made to work with those number 5 and 6.</p> <p>9 LORD JUSTICE LEVESON: Yes. Of course I understand the 10 point you make about statutory control very clearly. 11 But once you use a word like "compulsory", doesn't it 12 require some sort of structure, however much in the 13 background, that provides for the mechanism of 14 self-regulation? There have been lots of examples. 15 Doctors, solicitors, all the rest of them.</p> <p>16 A. Yeah, yeah.</p> <p>17 LORD JUSTICE LEVESON: But something in the background that 18 allows the press, with its independent representation as 19 well, to do the job itself --</p> <p>20 A. Sure.</p> <p>21 LORD JUSTICE LEVESON: -- against that background?</p> <p>22 A. Sure. Am I not right in thinking that newspapers are 23 licensed by the GPO, by the post office, as it were?</p> <p>24 LORD JUSTICE LEVESON: Well, that's an interesting question. 25 We'll find that out.</p> <p style="text-align: center;">Page 106</p>	<p>1 between 4, 5 and 6.</p> <p>2 A. Sure.</p> <p>3 LORD JUSTICE LEVESON: Does anybody have anything that they 4 want to raise? No?</p> <p>5 Mr Wallis, thank you very much indeed and thank you 6 for the obvious effort you put into creating the 7 statement.</p> <p>8 A. Thank you.</p> <p>9 MR JAY: Tomorrow it's not before 11.30 we're starting.</p> <p>10 LORD JUSTICE LEVESON: Thank you very much. Yes, that's 11 true, and it's entirely my responsibility for reasons 12 which I've previously identified. 13 (4.55 pm) 14 (The hearing adjourned until 11.30 am the following day) 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 108</p>

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