

<p>1 2 3 (1.30 pm) 4 LORD JUSTICE LEVESON: Right. Yes, Mr Patry Hoskins? 5 MS PATRY HOSKINS: Sir, I thought there was something you 6 might want to mention before we started. Do you want to 7 wait until after the evidence? 8 LORD JUSTICE LEVESON: No, let's deal with the evidence 9 first. 10 MS PATRY HOSKINS: The witness this afternoon is Mr Matthew 11 Driscoll. 12 LORD JUSTICE LEVESON: Thank you. 13 MR MATTHEW DRISCOLL (sworn) 14 Questions by MS PATRY HOSKINS 15 MS PATRY HOSKINS: Thank you very much. Make yourself 16 comfortable. I see that you have the bundle in front of 17 you. Could you please confirm your full name to the 18 Inquiry? 19 A. Matthew Driscoll. 20 Q. Can you confirm that the contents of the statement 21 you've provided to the Inquiry are true to the best of 22 your knowledge and belief? 23 A. Yes, they are. 24 Q. Mr Driscoll, I'm going to ask you mainly about your time 25 at the News of the World, where you worked from 1997 to</p> <p style="text-align: center;">Page 1</p>	<p>1 Q. I will be asking you about this in much more detail in 2 due course, but just so that we're clear from the 3 outset, you challenged that dismissal in an employment 4 tribunal? 5 A. Yes. 6 Q. That's correct? 7 A. That's correct. 8 Q. And the Tribunal found that (a) you'd been unfairly 9 dismissed? 10 A. Yes. 11 Q. And (b) that the newspaper was also found to have 12 discriminated against you on the grounds of your 13 disability; correct? 14 A. Correct. 15 Q. They were ordered to pay you compensation of almost 16 £800,000 plus legal costs; correct? 17 A. No. Only a certain amount of legal costs were paid. 18 Q. Included in that figure. 19 A. Mm. 20 Q. It's fair to say that during the time you worked there 21 the Tribunal found that the then editor had presided 22 over a culture of bullying; is that correct? 23 A. That's what the judgment found, yes. 24 Q. I'll come back to the whole of that in due course. 25 I just wanted to set the context.</p> <p style="text-align: center;">Page 3</p>
<p>1 2007, but before I do that, I'd like to ask you a little 2 about your early journalistic career. 3 A. Sure. 4 Q. You tell us in your statement that you worked initially 5 for a period of 12 years prior to joining 6 News of the World as a journalist? 7 A. Yes. 8 Q. First in local papers and in television, also for an 9 agency; is that correct? 10 A. Yes, I worked for a sports agency and I freelanced for 11 the News of the World as well. 12 Q. Then you moved to Express Newspapers to work as a sports 13 writer for the Daily Star? 14 A. That's right. 15 Q. I'll come back to that in a moment. It's from there 16 that you moved to the News of the World in June 1997; 17 correct? 18 A. Yes. 19 Q. From your employment tribunal decision, I've taken the 20 following dates: you worked for the News of the World 21 from 24 June 1997 until you were dismissed by letter 22 dated 26 April 2007, so a period of almost ten years. 23 A. Yes. 24 Q. Is that about right? 25 A. Yes.</p> <p style="text-align: center;">Page 2</p>	<p>1 Can I start, please, with your employment at the 2 Daily Star. How long did you work there? 3 A. I think it was about eight years, off the top of my 4 head. It was a long time ago. 5 Q. What was your job title? 6 A. I started off there as more or less junior sports 7 reporter, then I was promoted to a more senior role 8 during my time there. So I covered England football 9 matches and flew around the world with the England team. 10 Q. So if I can deduce, eight years, you left the Daily Star 11 in 1997? 12 A. Yes. 13 Q. So you must have started there in the late 1980s? 14 A. Yes. I was a very young journalist at the time. 15 Q. Have you had the opportunity of either reading or 16 hearing the evidence of Richard Peppiatt? 17 A. Yes, I read it last night. 18 Q. He told us all about the practices and ethics at the 19 Daily Star during the time he was working there. 20 A. Yes. 21 Q. Do you recognise that? Is that your experience of 22 working there? 23 A. There's certain aspects that I do recognise, but a lot 24 that I don't recognise. 25 Q. Can you tell us about each of those?</p> <p style="text-align: center;">Page 4</p>

<p>1 A. When I was there, the Daily Star had a very small budget 2 compared to the rest of Fleet Street. They couldn't 3 really afford to spend a lot on news gathering, and 4 certainly the use of any of the dark arts, as they now 5 seem to be called. The Daily Star wouldn't really be 6 able to afford that kind of stuff, even if they wanted 7 to. But while I was there, it was quite sort of -- I'd 8 like to call it sort of good old-fashioned journalism, 9 really. You went to go and see people and talk to them 10 fails to face and knock on doors and the Daily Star 11 was -- maybe not so much on showbiz but certainly on 12 sports, which was obviously my experience, it upheld 13 good standards.</p> <p>14 Q. Which aspects of his evidence did you recognise? 15 A. Certainly the grey area that there comes about in 16 showbiz reporting, when you get publicists. I knew 17 quite a lot of the showbiz guys on the Daily Star during 18 my years there and they would be hounded by publicists 19 trying to give them information, and they maybe didn't 20 feel it was their duty to find out whether that 21 information was true or not, since it had come from an 22 official source from that famous person or whichever 23 celebrity was trying to sell a record or a film. There 24 was a big grey area in that field of what was true and 25 what wasn't that was going into the paper.</p> <p style="text-align: center;">Page 5</p>	<p>1 ended up in court paying out large amounts of money to 2 someone who's 's been libelled, so there was a big onus 3 on that paper to make sure that things are accurate at 4 the time I was there.</p> <p>5 Q. How did you come to leave the Daily Star? 6 A. I was approached by the News of the World to go and work 7 for them.</p> <p>8 Q. Would it be fair to say that you were poached from the 9 Daily Star? 10 A. Yeah, yeah.</p> <p>11 Q. I'm going to take your time at the News of the World 12 chronologically, if I can. Turn to tab 5 in your 13 bundle. 14 A. Yes.</p> <p>15 Q. You should find an appeal statement. 16 A. Yes.</p> <p>17 Q. Can you just tell us what that statement is and why you 18 prepared this statement. 19 A. This was a statement that myself and my legal team at 20 the time prepared to appeal against my dismissal.</p> <p>21 Q. All right. For the purposes of the core participants 22 who have access to the document system, it's 21286, but 23 I would rather it wasn't shown on screen, if that's all 24 right. Thank you very much. 25 This explains at paragraph 2 that you started</p> <p style="text-align: center;">Page 7</p>
<p>1 Q. What about -- he discussed fabrication of stories, 2 fabrication of quotes. 3 A. That never -- 4 Q. Did you recognise that experience? 5 A. No. Definitely on sport, and in all my experience of 6 other journalists on that paper during the many years 7 I was there, I never heard of even people making up 8 stories, fabricating stuff to get in the paper. That's 9 not to say maybe in the showbiz world -- you know, there 10 might be a situation where they allow to put a quote 11 into a famous person's mouth with the blessing of 12 a publicist or an agent or manager who are trying to get 13 their names in the paper. Possibly that could go on, 14 but I never saw anything like he mentioned.</p> <p>15 Q. All right. Is there anything else you'd like to say 16 about the culture at the Daily Star while you worked 17 there? 18 A. Well, maybe because of their small budget, they were 19 very fearful of getting sued. It cost a lot of money. 20 Out-of-court settlements are things that the editor 21 would get very angry about, so if anything, the smaller 22 the budget, the more accurate a newspaper wants their 23 stories to be. We all know the Daily Star is a very 24 sensationalist and -- and that was the field it worked 25 in, but they certainly wouldn't have wanted to have</p> <p style="text-align: center;">Page 6</p>	<p>1 working for the News of the World in June 1997 as the 2 north-eastern football writer. Who did you report to at 3 that stage? 4 A. My sports editor, and obviously the editor as well. 5 Q. At that time, during 1997, who was the editor of the 6 News of the World? 7 A. Phil Hall. 8 Q. It would be fair then to say that you worked under Phil 9 Hall, you worked under Rebekah Wade and then under 10 Andy Coulson as well? 11 A. Yes.</p> <p>12 Q. And in fact, right at the end of the time of your 13 employment -- 14 A. It was Colin Myler, yeah. 15 Q. -- it was Colin Myler. Were you a staff reporter when 16 you started working? 17 A. Yes.</p> <p>18 Q. You tell us that you then relocated to Yorkshire to 19 concentrate on the northern football clubs? 20 A. Yeah. The clubs I had to cover were the north-eastern 21 football clubs initially. 22 Q. But within two years, so I guess by 1999, you were 23 promoted to chief northern football writer and you moved 24 to Chester, you tell us? 25 A. Yes, to be closer to Liverpool and Manchester United.</p> <p style="text-align: center;">Page 8</p>

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<p>1 Q. I understand. You tell us in the statement, for those 2 that don't have it, that you managed to forge a very 3 good relationship with the football managers that you 4 encountered? 5 A. Yes, that was part of my sort of duties, really. 6 Q. During the early period, 1997, 1999, were there any 7 problems with your employment at all? 8 A. No. Those were my sort of happiest days, really, in 9 Fleet Street. After a very difficult time of 10 relationships with some managers of football clubs, 11 because of the previous regime, maybe, or the reasons 12 they'd fallen out with the paper, I managed to build 13 bridges again and my career then was on the up. It was 14 a very good time. 15 Q. What was the feedback you were receiving from the sports 16 editor you reported to? 17 A. Mostly glowing reports of how well I was doing and -- 18 which was proved in my tribunal, with all the promotions 19 and pay rises I got. 20 Q. You also go on to explain that you continued to have 21 good relationships with the football managers whose 22 teams were you covering and you got some very good 23 scoops and everything seemed well at that stage? 24 A. Certainly, yeah. 25 Q. You tell us that you'd always wanted to come back to</p> <p style="text-align: center;">Page 9</p>	<p>1 I found out that someone else had been given that job 2 without any discussion with me. Clearly a new editor 3 turns up, he wants his own chief sports writer, he wants 4 to choose his own guy and put his own guy in, so that 5 job was given to someone else without any discussion 6 with me. Obviously, I wasn't very happy about it. 7 Q. Right. As far as you understood it, it was due to the 8 fact that Andy Coulson had come in as editor and he'd 9 simply appointed someone else? 10 A. Yeah. 11 Q. Then comes the event which you describe as the event 12 which -- you say: 13 "I still see this event as the beginning of the end 14 of my time at the News of the World." 15 It's the -- if I can call it the Arsenal purple 16 shirts incident. Can you tell us about that in your own 17 words? 18 A. Yeah. In newspapers there's one thing you must always 19 take notice of: if you get a tip from the editor, you 20 give it a lot more credence or a lot more importance, 21 because clearly that's come from the editor. One day 22 I got a phone call saying that Andy Coulson had heard 23 from somewhere that Arsenal were going to play in 24 a special new strip and it was my job to go -- since 25 I covered Arsenal, to make sure if that was true or not.</p> <p style="text-align: center;">Page 11</p>
<p>1 London to work, and you then attended a meeting in 2 London where you were told that you were to become chief 3 sports writer? 4 A. That's right. 5 Q. Can you tell me, do you have an approximate date for 6 that meeting? 7 A. No, I don't. I'd have to go through the records of my 8 tribunal, which might have got a bit closer to an 9 accurate date for that, I'm afraid. 10 Q. What about a year? 11 A. That was -- it would have been 2003, I think. 12 Q. How do you feel about that particular promotion? 13 A. I was very pleased. There was a sort of shake-up on the 14 paper. A few people left and certain people were 15 promoted and I was one of them, so I was quite excited 16 about it at the time, yeah. 17 Q. You then go on to tell us that at that time your pay 18 increased in line with the promotion but you didn't seem 19 to have attracted the job title? 20 A. No. 21 Q. What was your understanding of why you hadn't actually 22 become -- 23 A. There was a change of editorship kind of halfway through 24 that, and Andy Coulson became editor, and I was still 25 waiting for something to be put in writing, and then</p> <p style="text-align: center;">Page 10</p>	<p>1 Through exhaustive phone calls and enquiries, I was told 2 categorically by Arsenal Football Club which it wasn't 3 true, which I now believe that to be a lie, and then 4 a few months later, it appeared in the Sun on their back 5 page and it was in fact true. 6 I then get a phone call from my sports editor at the 7 time saying, "We're dead. Coulson's going to go 8 absolutely crazy over this and will want to know why we 9 got this wrong and why this appeared in the Sun." And 10 as I said in my tribunal, when a sports editor says, 11 "We're dead", what he means is: "You're dead." The 12 buck stops with me. It's never going to go any further 13 and he's not going to take the blame for it. So I knew 14 then that things were going to be difficult for me, and 15 you hope, really, that you can sort of knuckle down and 16 get on with your job and that things will smooth over, 17 but it transpired it didn't. 18 Q. Did Mr Coulson ever speak to you personally about that 19 incident? 20 A. No. I suppose that's kind of the way it works in 21 newspapers. The authority -- he maybe expresses his 22 opinion to the sports editor, knowing that the sports 23 editor will then convey his opinions to me. I mean, 24 I would speak to him now and again on the editorial 25 floor but not in that case.</p> <p style="text-align: center;">Page 12</p>

<p>1 Q. I'm going to turn to culture, practices and ethics at 2 the News of the World and I want to start with the topic 3 of blagging, if I can. In your witness statement, you 4 tell us about blagging practices. I'm going to start 5 with the incident which involved a Premiership football 6 manager's medical records. Please don't name him, but 7 tell us the story in your own words of what happened. 8 A. I had been given a tip that a very many prominent 9 football manager had health problems. I didn't know how 10 bad they might be or how significant they might be, but 11 it was something I had to check out. I did it 12 through -- it sounds like old-fashioned means now -- by 13 actually ringing contacts, speaking to people and people 14 that I knew on -- you know, from my time in sport, and 15 it was clear that something might be up because all the 16 signals I was getting back was: there might be 17 a problem. 18 But then I couldn't get any further forward on it 19 because I sort of hit a brick wall in terms of getting 20 anyone to go on record to tell me whether something was 21 true, and that manager involved clearly wouldn't 22 co-operate either, although I did approach him, and in 23 the end I had to go to my sports desk and say, "I really 24 don't think I can get any further forward with this." 25 And then my sports editor said, "Leave it with me." Page 13</p>	<p>1 A. I'm pretty certain the sports editor certainly didn't do 2 it, no. There were specialist people on the 3 News of the World who did that sort of stuff. 4 Q. When you say you're pretty certain, did he tell you 5 that? How did you know that? 6 A. He didn't tell me that, but I just know through working 7 practice that he wouldn't have got involved with 8 blagging, and there were special people on the news desk 9 or features desk that he went to. 10 Q. Did you ever see a copy of the medical records? 11 A. No, I didn't. This was a phone call. 12 Q. Do you know if the News of the World put the medical 13 records to the Premiership football manager in question? 14 A. I know there was a phone call to that football manager 15 to tell him exactly what we knew and that he was very 16 upset about it, and he made his thoughts known about 17 that and said that there was no way he wanted that story 18 to appear in public. And this is another technique on 19 the News of the World, if you want to call it 20 a technique, that information is a tradable commodity, 21 and it was put to [blank] that we wouldn't use this 22 information and in the end it was mentioned to him that 23 we would keep it quiet and we would keep it out the 24 public domain, and because of that, he then started 25 cooperating with the paper. Page 15</p>
<p>1 We'll see what we can come up with." And then it was -- 2 I'm pretty certain, as I said in my tribunal, it was 3 that day I got a phone call back saying, "You're 4 absolutely right with the story." 5 Q. Who was the phone call from? 6 A. My sports editor. He said, "You're absolutely the 7 right. The story is true. I have his medical records 8 with me at the moment." Having been on the Daily Star 9 where none of that ever happened, I was a bit aghast 10 that it seemed that easy to obtain someone's medical 11 records. He said, "It's nothing life-threatening, but 12 I know exactly what it is, what procedure he's had," and 13 I did ask, "How was that obtained?" and I was told it's 14 through a blagging technique. I was told that will 15 sometimes you'd get a situation where -- if an 16 investigator sent a fax to a GP or a hospital saying, 17 "I'm his specialist, I need these details", it was 18 incredible how many times that would just get sent 19 straight back. There were different techniques to 20 obtain them and I was told they weren't obtained through 21 any illegal source but it was from through blagging at 22 the time. 23 Q. Do you know whether the sports editor himself had 24 carried out the blag, or whether there was someone else 25 that he instructed? Page 14</p>	<p>1 Q. Can you tell me about whether or not you ever witnessed 2 any other incidents of blagging? 3 A. I can think of one other incident, when -- 4 Q. Again, please try not to mention any names. 5 A. I'm sorry. 6 LORD JUSTICE LEVESON: Just before you leave the last one, 7 do I gather that as a result of whatever the deal was, 8 the particular information that you had been checking 9 out did not appear in the public domain? 10 A. No, it didn't. Sorry, I probably didn't explain that 11 very well in the end because I was trying not to say 12 certain words. It was basically made clear that we 13 wouldn't use that information, and because of that -- 14 well, for instance, a few months later he gave us some 15 stories to use in the paper. 16 LORD JUSTICE LEVESON: So there was a deal done, 17 effectively? 18 A. You could definitely call it that, yeah. 19 LORD JUSTICE LEVESON: Thank you. 20 MS PATRY HOSKINS: Perhaps about before with we leave that 21 incident, I should ask you this. Some might say there 22 is a public interest in obtaining medical records in 23 some cases. If, for example, a politician, very 24 prominent politician, had an illness that might threaten 25 his ability to do the job, it might be appropriate to Page 16</p>

<p>1 obtain medical records in this way. Do you think there 2 was a public interest in obtaining the medical records 3 in this case? 4 A. I think there was a certain public interest in finding 5 out the medical well-being of a prominent figure who 6 works for a very large company. You know, a lot of 7 managers work for public limited companies. The method 8 used though, I wouldn't agree with that. 9 Q. You were coming on to give me -- 10 LORD JUSTICE LEVESON: But what about the use of that 11 information, if only to get some other advantage? Do 12 you think that's fair enough? 13 A. The use in the way that we ended up using it, you mean? 14 LORD JUSTICE LEVESON: Yes. 15 A. No, I don't agree with that, to be honest. I think 16 that's -- to say, "We've got information, we won't use 17 it as long as you co-operate", which is the kind of deal 18 that was being done there -- 19 LORD JUSTICE LEVESON: But just pushing that a bit further, 20 if you agree that you shouldn't use the information, and 21 if you agree that you shouldn't deal with the 22 information, what is the justification for getting the 23 information? 24 A. Don't get me wrong. If the News of the World had 25 obtained this information and it had been quite serious,</p> <p style="text-align: center;">Page 17</p>	<p>1 Q. Did you personally witness the phone call or were you 2 told about it? 3 A. No, no, I was just told about this. 4 Q. You tell us in your witness statement at paragraphs 7 to 5 8 that you spoke to colleagues about this blagging 6 technique and they told you that the practice had gone 7 on for some time and also that the obtaining of medical 8 records was common practice. Do you recollect that? 9 A. It was certainly something that wasn't a rarity, no. 10 Q. Did you ever raise your concerns with your sports editor 11 or with anyone else at the time? 12 A. No. I mean -- well, I certainly raised my surprise that 13 anything like that could be done. That was all new to 14 me, having come from the Daily Star. But, you know, as 15 I've thought about it long and hard, it would be a very 16 brave journalist, certainly in the early years of his 17 career on the paper, to suddenly say, "I'm not happy 18 with these techniques that are being used." You'd be 19 basically making a decision over your career there. 20 Anyone on that floor who complained too much would find 21 themselves pushed out, certainly. 22 Q. Can you assist us with why you think this type of 23 practice was going on? What was the purpose? Why did 24 they have to resort to this? 25 A. The main reason is to make sure a story's true. You</p> <p style="text-align: center;">Page 19</p>
<p>1 then I think the story would have appeared in the paper, 2 no matter what. I think they would have considered that 3 public interest. The fact that it wasn't serious meant 4 that it wasn't as big a story as maybe they had -- they 5 thought it had been initially, and therefore it was 6 a lot more convenient to keep it quiet, to not upset 7 someone who was a prominent figure, and to then use it 8 as a trade, yeah. 9 MS PATRY HOSKINS: You were coming on to tell us about 10 another occasion when you understood blagging to have 11 taken place. Again, please don't mention any names. 12 A. No, I can think of one case when a prominent Premier 13 League football player had tested positive to a drug at 14 his training ground and in that case someone pretended 15 to be from that football club and rang up the FA, and 16 that was a blagging technique, and the FA were then 17 happy to talk about the whole situation, all the ins and 18 outs of what had happened that week, and -- which stood 19 up the story, which satisfied the lawyers, and therefore 20 the story appeared on the back page of the paper that 21 week. And that was after I'd spent all week tracking 22 down the player involved and I had tracked down various 23 different sources, but it was that blagging technique 24 that got that story on the back page, that satisfied the 25 lawyers that it was true.</p> <p style="text-align: center;">Page 18</p>	<p>1 know, this is kind of the irony, really. Tabloid 2 newspapers are very fearful of getting a story badly 3 wrong, and the lawyers are just as -- the in-house 4 lawyers are just as scared of that because it costs 5 a lot of money if you do get it wrong. Not only do you 6 have the humiliation of putting an apology in the paper 7 or it being followed up and being disproved by other 8 papers, it can then cost you a lot of money in 9 out-of-court settlements, and money is the be all and 10 end all of tabloid newspapers, really, and the pressure 11 was on to make sure a story was correct and that you 12 wouldn't get any comeback legally. So there was 13 a pressure to use, as it now turns out, almost any means 14 necessary to make sure that a story was 100 per cent 15 true. 16 Q. Are there any other blagging incidents that you'd like 17 to draw to our attention? 18 A. Only ones I heard of. The examples I've given you are 19 the ones I'd directly worked on, yeah. 20 LORD JUSTICE LEVESON: I'm sorry, I just have to follow up 21 the last answer. So everything that was done was done 22 to avoid libel? 23 A. That's my opinion, yeah, certainly. 24 LORD JUSTICE LEVESON: Any consideration given to concepts 25 of propriety or privacy?</p> <p style="text-align: center;">Page 20</p>

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<p>1 A. I'm sure there would have been sometimes, but I think 2 the biggest priority was to make sure that that story 3 was true, to make sure there would be no litigation 4 further down the road. I think that's where the onus 5 lied.</p> <p>6 MS PATRY HOSKINS: I'm going on to accuracy of reporting. 7 It leads quite nicely from your last set of answers. Am 8 I right in concluding, then, that stories were not 9 fabricated at the News of the World?</p> <p>10 A. No. Any suggestion of that, I think, is absolutely 11 crazy because, you know, as I said, the litigation would 12 be too severe. It would cost too much money.</p> <p>13 Q. We've heard some witnesses say -- not necessarily 14 witnesses but we've heard some say that if a story 15 sounded true, you would just lob it in. Is that 16 something that you recognise?</p> <p>17 A. No. No.</p> <p>18 Q. I'm going to ask you about phone hacking now, please. 19 Again, it's very important not to mention any names. 20 You touch on this very briefly at paragraph 12 of your 21 statement and you say this: 22 "I feel sure that the introduction of hacking, 23 obtaining medical records and all of the rest of the 24 so-called dark arts were at least partially based on 25 satisfying lawyers that the crux of stories were sound."</p> <p style="text-align: center;">Page 21</p>	<p>1 Q. I understand. So would I be right to conclude that your 2 evidence is that phone hacking, as far as you're aware, 3 wasn't happening on the sports desk?</p> <p>4 A. Certainly not.</p> <p>5 Q. But it was happening, although you have no direct 6 knowledge of it, on the features and news desks?</p> <p>7 A. No, to say it never happened on sports, it might not be 8 quite correct in terms of the fact that sport would 9 sometimes, I was told at the time, have bits of 10 information that would be filtered down that might apply 11 to a sports personality but that came from news and 12 features.</p> <p>13 Q. I understand. I'd like you to comment on the evidence 14 of some other witnesses who have come to give evidence 15 to this Inquiry, please. We're going to start with 16 Mr McMullan. Did you hear his evidence or have a chance 17 to read it?</p> <p>18 A. I saw most of his evidence.</p> <p>19 Q. We know he worked there between 1997 and 2001.</p> <p>20 A. Yes.</p> <p>21 Q. He was eventually deputy features editor. That overlaps 22 with your time at the News of the World. Did you ever 23 meet him?</p> <p>24 A. Only in passing. Not very often.</p> <p>25 Q. I understand. For our benefit, behind tab 10 you were</p> <p style="text-align: center;">Page 23</p>
<p>1 A. Mm.</p> <p>2 Q. Tell us about the extent of your knowledge about phone 3 hacking at the News of the World, please.</p> <p>4 A. I had no direct involvement or direct knowledge about 5 it. My knowledge goes as far as speaking to colleagues 6 of mine at lunch and on certain jobs. I mean, it was 7 wide -- it was known throughout the whole of 8 Fleet Street that news reporters and features reporters 9 could -- writers could obtain either text messages or 10 voicemails. It goes back a long way. I heard, towards 11 the end of my Daily Star years, that there were scanners 12 that they could get that would scan into old mobile 13 phones and listen to phone conversations of royals and 14 celebrities. It had been going on for some time.</p> <p>15 Q. You mentioned features and news. Why?</p> <p>16 A. Well, because in sport, we speak to people face to face. 17 I have to work with them every day of the week, so 18 there's no -- there would be no interest in me using any 19 of those techniques on a football club. First of all, 20 I'd have a reputation that I used those techniques, then 21 I'd be ostracised by other football clubs. So sports is 22 completely different to news and features. News and 23 features can basically write one story about somebody 24 and never have to speak to them again, really, or never 25 see them again.</p> <p style="text-align: center;">Page 22</p>	<p>1 find his evidence. You see at the bottom of each square 2 there's a page number. It starts at page 29.</p> <p>3 A. Yes.</p> <p>4 Q. Actually, if you scroll through to page 49, you see 5 that?</p> <p>6 A. 49, yeah.</p> <p>7 Q. In the top left-hand corner. He's asked at line 10 -- 8 sorry, do you have page 49?</p> <p>9 A. 49, yes.</p> <p>10 Q. I should say for everyone else's note, this is 11 29 November 2011, page 49 of the transcript, line 10.</p> <p>12 A. Yes.</p> <p>13 Q. Do you see that? Mr Barr asks him: 14 "Can I move now to the question of voicemail 15 interception? In your experience, how common was 16 voicemail interception by journalists at the 17 News of the World?"</p> <p>18 He says: 19 "By the rank and file journalists? Yeah, not 20 uncommon. These journalists swapped numbers with each 21 other." 22 I'll pause there because there are some names. Do 23 you have any knowledge of that technique?</p> <p>24 A. No, I don't, personally. Through word of mouth. I know 25 that certain journalists would be able to get into</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 voicemails. I'm pretty certain it did go on, but to say 2 the rank and file is incorrect, I think. 3 Q. If you then turn to page 61, so a bit further on, 4 line 20, he's asked this. He's being asked about 5 a particular interview he'd given without his knowledge: 6 "Was the statement that you believed that phone 7 hacking was widespread across Fleet Street true?" 8 He says: 9 "Yeah, I thought the News of the World was one of 10 the least bad offenders. The others were much worse." 11 I don't know if you saw that? 12 A. Yeah. 13 Q. Do you have any knowledge, personal or otherwise, about 14 phone hacking around the rest of Fleet Street? 15 A. Again, this is only word of mouth from colleagues of 16 mine who worked for other papers, but I'm pretty certain 17 it wasn't just the News of the World. I would agree 18 with some of that. 19 Q. If you look over the page to page 65 -- 20 LORD JUSTICE LEVESON: Sorry, could I just clarify that? 21 MS PATRY HOSKINS: Of course. 22 LORD JUSTICE LEVESON: Is this knowledge that you had dating 23 back to when you were working there? 24 A. Yes. 25 LORD JUSTICE LEVESON: Or knowledge that's only come</p> <p style="text-align: center;">Page 25</p>	<p>1 He says that it was an extensive practice using private 2 investigators. Do you have any knowledge of private 3 investigators being used whilst were you at 4 News of the World? 5 A. No. 6 Q. Finally at page 85, he talks about searching through 7 bins for information. Do you have any knowledge of that 8 particular technique? 9 A. None direct. Only I heard that certain writers would go 10 that far. Well, if you can call them writers, that is. 11 Q. Again, just to echo the chairman's question, was that 12 something which you heard about at the time -- 13 A. At the time, through my years of being on the road as 14 a sports writer, you'd hear anecdotal stuff like that. 15 Q. We can leave Mr McMullan's evidence. You told us 16 earlier that blagging and other unethical practices 17 seemed to be happening for the simple reason that there 18 was real legal pressure for evidence for stories? 19 A. Yes. 20 Q. We heard about that pressure from other witnesses. Do 21 you think that would lead to a pressure to adopt these 22 particular practices? 23 A. I believe that's where a lot of the pressure came from. 24 I'm not saying that was the only pressure that may have 25 forced -- well, not forced, or encouraged a news</p> <p style="text-align: center;">Page 27</p>
<p>1 chatting about it through 2011? 2 A. Oh no, no, certainly from working there, yeah. 3 LORD JUSTICE LEVESON: Thank you. 4 MS PATRY HOSKINS: On page 65 at line 17, Mr Barr asks him 5 about blagging, one of the topics we've just been 6 discussing. 7 A. Mm. 8 Q. He's asked, line 20: 9 "You've already mentioned once an example of 10 blagging being used. Was blagging a commonly-used 11 technique to obtain information when you were working at 12 News of the World?" 13 He says: 14 "Yes. Serious wrongdoers don't admit it but they're 15 generally really pompous and overbearing people and it's 16 an absolute joy to bring them down." 17 Then he gives an example. Now, again, given the 18 evidence that you have given, would you agree with him 19 that blagging was something which was a commonly used 20 technique at News of the World? 21 A. I believe it to be common, but obviously in my 22 experience it was only used a few times directly with my 23 involvement. 24 Q. He's then asked about the use of private investigators 25 on page 78. I don't necessarily need to read about it.</p> <p style="text-align: center;">Page 26</p>	<p>1 reporter to use certain methods. Clearly, you know, 2 other ones would be to get a story, to sell the paper, 3 to get a big front page exclusive. There were a lot of 4 pressures on a news staffer at the News of the World to 5 perform and get stories. 6 Q. But you go further, Mr Driscoll, in this sense, at 7 paragraph 34 onwards of your statement. Particular in 8 paragraph 35, you explain that in your years at 9 News International, you came to believe that 10 News International were confident that they were 11 untouchable because they were sure they had the 12 government and police fighting their corner. They felt 13 they were almost beyond the reach of the law, you say. 14 You go on to explain that most of the journalists on the 15 paper were decent people who had been trapped into this 16 whirlpool, you say, of trying to obtain stories, but 17 senior executives on the paper, I think you say, were 18 handed too much power and their egos were allowed to run 19 wild. 20 A. Mm. 21 Q. Is that something which you think was confined to the 22 editors or senior executives at News International or is 23 that something that you saw reflected throughout 24 Fleet Street? 25 A. I'd say throughout Fleet Street, really. It's a kind of</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 bizarre world that the editors and big executives on                  2 newspapers work in. They rarely get questioned by                  3 anyone, certainly their staff. Most of the people                  4 they're surrounded by are people who are going to say                  5 yes and are going to agree with them most of the time.                  6 I can think of a few examples where most of the staff                  7 would be thinking: "Why have we got that on the front                  8 page? Why is that story being used? It's not going to                  9 sell papers. It's the wrong story to have this week or                  10 this day." But no one was brave enough to actually say                  11 that to the editor, and editors would lead a very                  12 cossetted life. You would see some people become                  13 editors having been good journalists and very good                  14 industry men, and it was a classic cliched example of                  15 power corrupting. They'd suddenly walk into this life                  16 of chauffeur-driven cars and very high salaries and                  17 I think some of them lost touch with reality.                  18 The be all and end all is the readership. As long                  19 as the readership maintains -- and this is in                  20 a declining industry, so the editors were under pressure                  21 from the proprietors to make sure that that readership                  22 maintained a certain level and certainly that pressure                  23 was then passed down, but it was all about making sure                  24 that they sold more papers and made more money for --                  25 what I was trying to say by that is I just think they --</p> <p style="text-align: center;">Page 29</p>	<p>1 a Muslim man after the July bombings in London.                  2 A. Yeah.                  3 Q. Would that be a fair assessment?                  4 A. That's right.                  5 Q. We don't need much detail about this, but it's correct,                  6 isn't it, that this article was the subject of                  7 a complaint by Arsenal Football Club because the PR                  8 officer took the view that she would prefer it if you                  9 restricted your conversations with Arsenal players to                  10 football-related matters. Is that a fair assessment?                  11 A. When it suited them, yes. Unless a footballer was doing                  12 an autobiography, in which case they talked about                  13 anything, and complaints were quite common from football                  14 clubs all the time.                  15 Q. So they made a complaint about that particular article.                  16 A. Yeah.                  17 Q. When the complaint came in, you were asked by your                  18 sports editor to provide a record of the interviews that                  19 you had undertaken with Kolo Toure; is that right?                  20 A. Yeah.                  21 Q. You had a tape of the first part of the interview?                  22 A. Yeah.                  23 Q. And you had written notes of the second part, as I                  24 understand?                  25 A. Shorthand, yeah.</p> <p style="text-align: center;">Page 31</p>
<p>1 reality wasn't -- they didn't keep a grasp of reality                  2 very well.                  3 Q. I understand. I'm going to come back to you and how                  4 your employment at News of the World came to an end, but                  5 before I do that, is there anything else you'd like to                  6 say about unethical practices or illegal practices at                  7 News of the World, other than ones we've discussed?                  8 A. Not other than the ones we've discussed, no.                  9 Q. I'm now going to come on to ask you about another aspect                  10 of the culture at the News of the World, namely                  11 bullying, and I'm going to do that by reference to your                  12 own case, if I can. Again, I'm going to take it                  13 chronologically.                  14 If we turn back to tab 5, which is your appeal                  15 statement, and if you look at paragraph 11 onwards, that                  16 will give you an idea of where I'm going with my                  17 questions.                  18 A. All right.                  19 Q. We're going to start, please, with the incident                  20 involving -- I can name him because it's nothing                  21 controversial -- Kolo Toure at Arsenal. I understand                  22 that you published a piece or an article on 31 July 2005                  23 about Kolo Toure, and that the whole point of the                  24 article was essentially that you'd interviewed him and                  25 asked him about how he felt about living in London as</p> <p style="text-align: center;">Page 30</p>	<p>1 Q. Did the interview actually take place in two parts on                  2 two occasions?                  3 A. Yes.                  4 Q. Out of pure interest, why did you have a tape of the                  5 first part and only shorthand notes of the second?                  6 A. Because I was chasing him around to get enough to make                  7 it into an actual spread and they were training in                  8 Austria at the time, so you only get certain -- almost                  9 minutes, sometimes, to interview players, so you try and                  10 make the most of it at the time.                  11 Q. Okay. You were asked for those -- the tape and the                  12 notes, and you sent them, there was some trouble in                  13 opening the particular email and then you sent it again;                  14 is that right?                  15 A. That's right.                  16 Q. Then you were summoned, as I understand it, to                  17 a disciplinary meeting for failing to provide the                  18 information that had been requested; is that correct?                  19 A. Yes, that's right.                  20 Q. You tell us that the disciplinary meeting was chaired by                  21 the very person that you had sent the information to?                  22 A. Yes.                  23 Q. Is that right?                  24 A. Who, it turns out, was responsible for that not being                  25 sent to Arsenal Football Club. To give you just</p> <p style="text-align: center;">Page 32</p>



<p>1 a little bit of background, the Press Complaints 2 Commission had received a complaint, and that was taken 3 very seriously on the News of the World, and the editor 4 at the time was very keen that this was chased up and 5 that we responded appropriately. So the duty wasn't to 6 me to respond; it was to the sports editor who was given 7 that task. So it was a bit surprising, really, that he 8 was chairing a disciplinary hearing to look into 9 something that he had actually done -- not done himself.</p> <p>10 Q. I don't want to go into a massive amount of detail -- 11 it's unnecessary to do so -- but it's clear that at the 12 meeting they had to accept that you had sent the 13 information that had been requested of you because you 14 had the email to prove it.</p> <p>15 A. Yes.</p> <p>16 Q. But you got a written warning for failing to have both 17 parts of the interview on tape?</p> <p>18 A. Yes.</p> <p>19 Q. Correct? Now, from your experience, did every interview 20 have to be tape recorded in this way?</p> <p>21 A. No.</p> <p>22 Q. Tell us more about that.</p> <p>23 A. I'd worked on the paper long enough to know exactly -- 24 of course, if you could have everything on tape, you 25 would, but if you were walking down a street or standing</p> <p style="text-align: center;">Page 33</p>	<p>1 Q. As I understand it, that letter to Andy Coulson 2 suggested that you wanted to move on from the incident?</p> <p>3 A. Yes, put it behind us, yes.</p> <p>4 Q. You received a response from Andy Coulson dated 5 11 November 2005?</p> <p>6 A. Yes.</p> <p>7 Q. What did he say in that response?</p> <p>8 A. He said, "In my opinion, I would have sacked you", which 9 I found amazing, for someone who had been working on the 10 paper for so long. This was the first ever incident of 11 anything maybe that I could be questioned over, and 12 since I had been questioned and had proved that I'd done 13 everything that was asked of me, I found it quite 14 amazing that he would say something like that.</p> <p>15 Q. The employment tribunal obviously saw that response and 16 made comments on it, which we'll come back to. How did 17 you feel about receiving that response from the editor 18 of the newspaper?</p> <p>19 A. I felt that I was on borrowed time, to be honest. When 20 an editor writes you a letter that sort of irrational, 21 you know that, yeah, you're confined of on borrowed 22 time, really.</p> <p>23 Q. You continued in your employment at News of the World. 24 Let's move to six months later, March 2006. You have 25 another run-in with Mr Coulson. This is in relation to</p> <p style="text-align: center;">Page 35</p>
<p>1 in the rain talking to a footballer who you know pretty 2 well, shorthand is very adequate. In fact, sometimes 3 you'll find that shoving a tape recorder under 4 a football player's nose makes them more conscious of 5 what they're saying, so you'd quite often take things 6 down in shorthand. So it was -- it suddenly became that 7 that was policy on the News of the World when I knew it 8 wasn't because I knew a lot of time news reporters would 9 go out and just only use shorthand.</p> <p>10 Q. Had anyone ever been disciplined on that basis to the 11 best of your knowledge?</p> <p>12 A. Certainly not to the best of my knowledge, no.</p> <p>13 Q. How did you feel as a result of that disciplinary 14 meeting?</p> <p>15 A. Very angry, and I voiced my opinions to my sports editor 16 at the time, because I felt it was very unjust, but 17 I then sent a letter to Andy Coulson saying that -- 18 basically, I was sort of given the impression that it's 19 sort of: take the yellow card, as they would call it, 20 and take the disciplinary, and Andy Coulson will feel 21 satisfied that he's disciplined someone for this. So 22 I sent him a letter saying, "For the sake of harmony", 23 I think I said something like that, "on the paper so 24 I can carry on my job, I will take this, although 25 I still think I was vindicated in my actions."</p> <p style="text-align: center;">Page 34</p>	<p>1 an incident relating to a piece that you'd written about 2 Charlton. Can you tell us about that in your own words?</p> <p>3 A. Again, it was a complaint about a chief executive who 4 said he'd been misquoted by me and that I should have 5 approached him on a story. And not for a big club we're 6 talking about. I think the actual article was about 7 four or five paragraphs. Normally, these get relayed to 8 me and I sort them out. I go and see him and sit down 9 and chat about it and sort it out. But again, the 10 newspaper made it into some enormous crime and the 11 disciplinary machinery whirred into action once again. 12 I knew exactly what it all meant: they were just trying 13 to find ways to get rid of me.</p> <p>14 Q. The article you wrote subsequently turned out to be 15 entirely true, didn't it?</p> <p>16 A. It was proved in a biography, yeah.</p> <p>17 Q. In the light of that particular incident, you tell us 18 that you wrote a letter to your sports editor saying you 19 feared that Mr Coulson was trying to force you out and 20 offering to leave the paper if that's how he felt.</p> <p>21 A. Yes, because I'd seen this happen to colleagues over the 22 years and there's almost nothing you can do to suddenly 23 persuade an editor that you are still a good journalist. 24 If he decides he doesn't like your face any more, you 25 can't swim against the tide. I actually generally felt</p> <p style="text-align: center;">Page 36</p>

<p>1 that, you know, I could leave that paper and I was 2 employable certainly on other papers and shake hands and 3 not let it degenerate into a war, almost, you know, and 4 I didn't -- I was conscious I didn't want to fall out 5 with people over it. 6 LORD JUSTICE LEVESON: Over what sort of period of time are 7 we talking about? Because you're talking very much, in 8 both this answer and a previous answer, about your 9 perception of the culture of what was happening in the 10 paper. 11 A. Yes. 12 LORD JUSTICE LEVESON: Was that something that was brand new 13 on to you or was that something -- 14 A. No. As I said, I'd seen colleagues of mine get similar 15 sort of treatment. I don't think anything as bad as 16 what I ended up having to endure. 17 LORD JUSTICE LEVESON: Just at News of the World or 18 otherwise? 19 A. Not just at News of the World, because colleagues of 20 mine would tell me stuff that was going on at other 21 papers and some of the treatment there could be terrible 22 from editors. An editor can make you look very good, 23 but he can also make you look very bad, because he 24 decides who gets the tips, who gets the stories to work 25 on. He also can decide whether your copy gets into the</p> <p style="text-align: center;">Page 37</p>	<p>1 A. Mm. 2 Q. For your sake, I don't want to go into that in any great 3 detail, but it is fair to say that at around this time 4 you went to your GP and he diagnosed you as suffering 5 from severe depression? 6 A. Yeah, which, as my GP tried to explain to me -- which 7 again is relevant, I think, to this Inquiry, that 8 journalists work under an incredible amount of pressure 9 and stress, and it was his opinion that you get used to 10 that level of stress. You just think that's normal. 11 You know, the high sort of fast lane of sort of 12 Fleet Street does take its toll. You travel around the 13 world, you work at a great pace, so if something doesn't 14 go quite right, you can quite easily get tipped over the 15 edge. You're used to a high level of stress, but you're 16 almost at saturation point and that was his opinion of 17 what happened to me. 18 Q. You tell us that this diagnosis was in July 2005; is 19 that right? 20 A. Yes. 21 Q. You weren't dismissed until April 2007. 22 A. No. 23 Q. Can you tell us about your health during that two-year 24 period? 25 A. It got progressively worse, and my GP was at pains to</p> <p style="text-align: center;">Page 39</p>
<p>1 paper or not. At the same time, he can decide to 2 protect you and give you a large amount of space in the 3 paper. So if a journalist finds that his face doesn't 4 fit all of a sudden, they can quickly make you look 5 quite bad, which editors, because they have that much 6 power, can do quite easily. 7 MS PATRY HOSKINS: Can we orientate ourselves in time? 8 These two disciplinary meetings or hearings took place 9 after July 2005 and then March 2006? 10 A. That's right, yes. 11 Q. By then you had been at the paper for eight years. 12 A. Yeah. 13 Q. Prior to that point, had there been any negative 14 feedback about your performance as a journalist? 15 A. Not at all. In fact, as my tribunal showed, I'd had 16 mostly glowing assessments for every year, including, as 17 I said, promotions and pay rises. 18 Q. Moving through the chronology, there was a second 19 disciplinary hearing about this Charlton matter and you 20 were given a final written warning; is that right? 21 A. That's right. 22 Q. You were represented at that hearing by Steve Turner, 23 who will be giving evidence tomorrow. 24 You set out in your appeal statement what 25 a devastating effect all of this had on your health.</p> <p style="text-align: center;">Page 38</p>	<p>1 sort of try and obviously help me and make me better, 2 and he was stressing the importance to distance myself 3 from the source that was making me that ill, which was 4 the News of the World. They took no notice of any 5 instructions that he gave me. They -- it made no 6 difference to them at the time. 7 Q. Again, I don't want to go into huge amounts of detail 8 about the way that News International acted during that 9 two-year period -- it can all be read in detail in the 10 appeal statement, sir -- but I do want to highlight some 11 the behaviours. I'm going to read you out a series of 12 things that happened and you tell me whether I've 13 assessed it correctly. 14 A. Sure. 15 Q. July 2005, you were diagnosed as suffering from severe 16 depression and the advice of your doctor was that you 17 should distance yourself from News of the World in order 18 to get better? 19 A. Mm. 20 Q. News of the World were told this by your union 21 representative at the time. They were told that that 22 was the advice? 23 A. Yes. 24 Q. That you should distance yourself. Despite this, at 25 least during the initial period, they called you on your</p> <p style="text-align: center;">Page 40</p>

<p>1 home number or your mobile every day?                  2 A. Usually more than once a day, yeah.                  3 Q. Usually more than once a day. They also sent emails and                  4 recorded delivery letters to your home. You said it                  5 felt like every day. It may not have been --                  6 A. It may not have been, but it certainly felt that, yeah.                  7 Q. They insisted that you see a company doctor in order to                  8 confirm your diagnosis, and despite being told that you                  9 would see an independent doctor, they sent you a letter                  10 saying that you would have your pay stopped if you                  11 didn't agree to see the company doctor; correct?                  12 A. Yes.                  13 Q. The company doctor arrived at your home regardless of                  14 being told that you didn't want to see anyone from the                  15 company?                  16 A. It was actually the company nurse.                  17 Q. The company nurse.                  18 LORD JUSTICE LEVESON: So it's not that they wanted you to                  19 see a doctor. You were prepared to be seen by an                  20 independent doctor but --                  21 A. Anyone, yeah, but I was -- by that time, I was very                  22 distrustful of their motives, so I insisted it had to be                  23 an independent doctor that I would see.                  24 MS PATRY HOSKINS: The company nurse arrived at your home                  25 regardless. They then stopped your pay, despite the</p> <p style="text-align: center;">Page 41</p>	<p>1 Q. You then told them that your father was seriously ill                  2 with heart problems and you couldn't attend this hearing                  3 because of the fragility of your own health and the fact                  4 that you were dealing with your father's health                  5 problems.                  6 A. Yes.                  7 Q. Despite this, that meeting went ahead in your absence                  8 and you were dismissed?                  9 A. Yes.                  10 Q. Have I fairly represented the course of events over that                  11 two-year period?                  12 A. Yes, I believe you have.                  13 MR DAVIES: I'm sorry to interrupt, but I think this is                  14 actually a one-year period.                  15 MS PATRY HOSKINS: I'm so sorry, is it?                  16 MR DAVIES: Yes. I think there is a an error in                  17 Mr Driscoll's statement.                  18 MS PATRY HOSKINS: Do you mean the July 2005 date is wrong?                  19 MR DAVIES: Yes. It is July 2006.                  20 MS PATRY HOSKINS: Is it July 2006, the diagnosis?                  21 A. Yes. Yes, I think -- sorry about that. I think you're                  22 right.                  23 LORD JUSTICE LEVESON: Thank you very much. Can we correct                  24 that in the statement as well, please, that goes on the                  25 website? Can we just make a change?</p> <p style="text-align: center;">Page 43</p>
<p>1 fact that you had medical certificates covering the                  2 whole period; is that correct?                  3 A. Yes.                  4 Q. That caused you severe financial difficulties on top of                  5 the health difficulties that you were suffering?                  6 A. Yes.                  7 Q. Then, with the help of your union representative, it was                  8 reinstated, but only on the basis that you agreed to see                  9 their choice of independent doctor?                  10 A. Yeah.                  11 Q. Your diagnosis worsened after that point?                  12 A. Mm.                  13 Q. The independent doctor confirmed the original diagnosis.                  14 Then your pay stopped again?                  15 A. Yes.                  16 Q. When contacted, they promised to reinstate it, but they                  17 didn't?                  18 A. That's true.                  19 Q. Then you got a letter on 5 March 2007 threatening to                  20 dismiss you on the grounds of ill health?                  21 A. (Nods head)                  22 Q. Then they sent you a letter inviting you to another                  23 disciplinary hearing over your attendance record and                  24 capacity for work, yes?                  25 A. Yes.</p> <p style="text-align: center;">Page 42</p>	<p>1 MS PATRY HOSKINS: Of course.                  2 LORD JUSTICE LEVESON: Thank you.                  3 MS PATRY HOSKINS: All right. So all of that happened over                  4 the course of one year?                  5 A. Yes.                  6 Q. I'm going to turn, please, to the employment tribunal                  7 proceedings and I'm going to refer to that in just                  8 a little detail so that essentially we can see whether                  9 the Tribunal accepted that what you say now is true. We                  10 know that you appealed your dismissal. The decision of                  11 the Tribunal is at tab 3. It's document 21328. We can                  12 show that a screen.                  13 We can see from the front page of that document that                  14 the Tribunal proceedings took place over three separate                  15 weeks in summer 2008.                  16 A. With a four or five-month gap in the middle of it.                  17 Q. Can I ask, how was your health at that stage?                  18 A. Not particularly good, really. I was -- by that time,                  19 I was on different medication, so it was stabilising.                  20 Q. How did you feel about going through with the appeal?                  21 A. It was something I had to do, really. I just --                  22 I obviously clearly didn't want to do it. I would have                  23 done anything to have avoided that situation, but I had                  24 to do it.                  25 Q. Right. Just for the record, we can agree, can't we,</p> <p style="text-align: center;">Page 44</p>

<p>1 that News International agreed that the mental health 2 problems that you had suffered were a disability for the 3 purposes of those proceedings? 4 A. Yes. 5 Q. We can look at the front page and we can see there the 6 findings in very short form: 7 "The unanimous judgment of the Tribunal is that the 8 claimant was unfairly dismissed. The complaint of 9 disability discrimination succeeds, as further set out 10 below." 11 This says the case has to be listed for a remedy 12 hearing. We don't have the transcript of that, but we 13 can come back to exactly what they said during that 14 remedy hearing in due course. 15 Can I ask you, please, to turn first of all to 16 page 4 of that document, under "Unfair dismissal". The 17 only question in relation to unfair dismissal was: 18 "What was the reason or principal reason for the 19 claimant's dismissal?" 20 Just so we orientate ourselves in the law. 21 I promise we won't go through the law in any detail. 22 If we then turn to pages 6 and 7 on discrimination, 23 we can see that the relevant questions were 24 paragraph 23: 25 "Was the claimant a disabled person between the Page 45</p>	<p>1 the findings of fact. Can we just pause there. Did 2 Mr Coulson come to give evidence at the tribunal? 3 A. No, he didn't. 4 Q. Who did give evidence? 5 A. They had quite a long list of people giving evidence. 6 My sports editor, my HR -- 7 LORD JUSTICE LEVESON: We can see it at page 16, 8 paragraph 75: the director of human resources, the 9 occupational health manager, the occupational health 10 doctor, the human resources business partner. Then 11 Mr Kuttner, the managing editor, Rosemary Ryde, the 12 senior legal counsel, Mike Dunn, the sports editor and 13 Paul Nicholas, the deputy managing editor. And you had 14 yourself, your union representative and your father? 15 A. Yes. 16 MS PATRY HOSKINS: If we look at page 18 internally. At the 17 top of that page you'll find paragraph 83. I'm not 18 going to go through all the findings of fact but I'm 19 just going to highlight some of the particularly 20 important paragraphs. 21 A. Sure. 22 Q. Paragraph 83, they note the promotions that you've 23 referred to. They were provided about copies of your 24 appraisals for certain years, and each of the three 25 years you were classified as very good, good and good. Page 47</p>
<p>1 relevant periods?" 2 Mr Davies is quite correct to say it was July 2006. 3 We can see that. And yes, News International accepted 4 that you were a disabled person. 5 Then there was a question about direct 6 discrimination which is too long for me to read out, and 7 there is also, under the heading "Harassment" at 8 paragraph 27: 9 "Did the respondent engage in unwanted conduct which 10 had the purpose or effect of (a) violating the 11 claimant's dignity or (b) creating an intimidating, 12 hostile, degrading, humiliating or offensive environment 13 for him by ..." 14 Then there's a whole series of particulars. Do you 15 see that? 16 A. Yes. 17 Q. Just for the sake of completeness, on 8 and 9, we can 18 see that there were also relevant questions on 19 disability-related discrimination, paragraph 29 onwards, 20 and failure to make reasonable adjustments, paragraph 33 21 onwards. 22 A. Yeah. 23 Q. Then they go through the relevant law, which we can 24 ignore because it's lengthy and not relevant for today's 25 purposes, but if we turn to page 17 internally, we find Page 46</p>	<p>1 The comments given were very positive. 2 There was only one slight reservation: 3 "He does not pull as many stories as we would 4 ideally like." 5 But other than that, all the comments were positive. 6 And at 84, they conclude that the promotions and 7 favourable comments show that you were, at least up to 8 that point, a successful, well-regarded tabloid sports 9 journalist and they say it's significant because 10 ordinarily it's slightly surprising for someone to go 11 from being a successful sports journalist to an 12 unsuccessful one. Do you see that? 13 A. Mm. 14 Q. If you move down to paragraph 87, they were then 15 considering the question of whether or not you had gone 16 on to become an unsuccessful journalist, and they find, 17 about halfway down that paragraph, that Mr Dunn -- who 18 was Mr Dunn? 19 A. He was my sports editor. 20 Q. With the benefit of hindsight, in an attempt to bolster 21 the defendant's case, had exaggerated any shortcomings 22 that you may have had. Again, we don't need to read out 23 all the reasons they give, but that's a finding of fact 24 that they make, that there was an exaggeration of any 25 shortcomings. Page 48</p>

<p>1 A. Yeah.</p> <p>2 Q. At paragraph 88, they note that one further staff</p> <p>3 assessment for 2002 you were downgraded to</p> <p>4 a satisfactory rating, but there were no appraisals</p> <p>5 after that -- for the years after that.</p> <p>6 A. None that they would supply to us, no.</p> <p>7 Q. They said that was rather surprising, and at best -- the</p> <p>8 explanation given was:</p> <p>9 "After that year, we didn't actually provide any</p> <p>10 written staff assessments. We would simply deal with it</p> <p>11 by talking to the relevant staff member. There wouldn't</p> <p>12 be a formal written appraisal in the traditional sense."</p> <p>13 And the Tribunal says this:</p> <p>14 "At best, there appears to be some double standards</p> <p>15 in this, given his later criticisms of the claimant for</p> <p>16 failing to have sufficient documentary evidence to back</p> <p>17 up his articles."</p> <p>18 They then go on to confirm at paragraph 89 what you</p> <p>19 say about the Kolo Toure incident, whether or not</p> <p>20 Mr Coulson turned against you as a result of the</p> <p>21 incident in late 2004. They find that to be entirely</p> <p>22 true.</p> <p>23 A. Yes.</p> <p>24 Q. Now if we turn to paragraph 103, which is just over the</p> <p>25 page, internal page 21. They confirm what you say about</p> <p style="text-align: center;">Page 49</p>	<p>1 of the first disciplinary hearing?</p> <p>2 A. Certainly, which clearly I wasn't aware of at the time</p> <p>3 until disclosure.</p> <p>4 Q. Then at 105, they note that you felt it was highly</p> <p>5 unfair to have been issued with a warning and they</p> <p>6 record the fact that you wrote essentially saying, "In</p> <p>7 the interests of harmony, let's just get on the with</p> <p>8 job."</p> <p>9 A. Yes.</p> <p>10 Q. At 106, they say this:</p> <p>11 "Mr Coulson responded to Mr Driscoll's letter. The</p> <p>12 contents of his response are also very telling. He</p> <p>13 stated:</p> <p>14 "I also disagree with the adjudication. In my</p> <p>15 view, your actions on this matter merited dismissal'.</p> <p>16 "He went on to state that his performance would be</p> <p>17 monitored closely and that if it did not improve or</p> <p>18 there was a repeat of any of the failings, further</p> <p>19 disciplinary action may be invoked against him."</p> <p>20 So I pause there. The Tribunal clearly saw the</p> <p>21 response of Andy Coulson to your letter and found as</p> <p>22 a matter of fact that he had said those things to you?</p> <p>23 A. Yes.</p> <p>24 Q. In a letter?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 51</p>
<p>1 the first disciplinary hearing as well.</p> <p>2 A. Yes.</p> <p>3 Q. Again, I don't want to read that out in detail, but they</p> <p>4 find the sports editor to have exaggerated what he said</p> <p>5 about that disciplinary hearing, et cetera.</p> <p>6 Turning over the page again, we have a series of</p> <p>7 paragraphs that start at paragraph 104, please.</p> <p>8 A. Yes.</p> <p>9 Q. They record this as a matter of fact:</p> <p>10 "Mr Kuttner wrote to Mr Coulson by email dated</p> <p>11 9 November 2005."</p> <p>12 This is obviously after the first incident relating</p> <p>13 to Kolo Toure.</p> <p>14 A. Yes.</p> <p>15 Q. "The contents of what he wrote are telling. He stated</p> <p>16 that the situation was not black and white enough to</p> <p>17 dismiss [you]. He went on to state:</p> <p>18 "'Of course, we could still fire him and pay the</p> <p>19 going rate for that. Mike Dunn tells me Driscoll can't</p> <p>20 be got shot of.'</p> <p>21 "The decision to give the claimant a first warning,</p> <p>22 although the outcome of a disciplinary hearing chaired</p> <p>23 by Mr Dunn was made by Mr Kuttner with the agreement of</p> <p>24 the editor, Mr Coulson."</p> <p>25 So that's what was going on internally at the time</p> <p style="text-align: center;">Page 50</p>	<p>1 Q. Let's read on:</p> <p>2 "He offered no words of encouragement. In the</p> <p>3 context of Mr Coulson being the editor of the paper,</p> <p>4 this was a bullying remark. A less bullying response</p> <p>5 might have been to encourage him to take the criticisms</p> <p>6 on board and work with Mr Dunn to improve his</p> <p>7 performance and reputation to its former high</p> <p>8 standards."</p> <p>9 Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. At 107, they go on to turn to another dispute of fact,</p> <p>12 and that's your contention that the reason or principal</p> <p>13 reason for your dismissal was simply the fact that the</p> <p>14 respondent wanted to remove you and that the</p> <p>15 disciplinary action over the Toure article was a pretext</p> <p>16 and formed part of a continuous chain that subsequently</p> <p>17 led to your dismissal. You see that?</p> <p>18 A. Yes.</p> <p>19 Q. They said, halfway down that paragraph:</p> <p>20 "We find the disciplinary action over the Toure</p> <p>21 article, subsequent disciplinary action over an article</p> <p>22 he wrote about the then Charlton manager ... and</p> <p>23 proposed disciplinary action about the failure to comply</p> <p>24 with an instruction to attend the office at 10 am each</p> <p>25 morning was a pretext. It was a pretext for</p> <p style="text-align: center;">Page 52</p>

13 (Pages 49 to 52)

<p>1 Mr Coulson's desire to get shot of the claimant, which 2 was accepted by other members of the respondent's senior 3 management team." 4 You see that? 5 A. Yes. 6 Q. They go on to give a very lengthy set of reasons as to 7 why they make that finding, which we don't need to look 8 at in detail, save for one point of detail, please, at 9 paragraph 107.2 on page 23. They say this about 10 Mr Turner, who's coming tomorrow, and that's why I note 11 it. They say that he was an impressive witness: 12 "He gave unchallenged evidence that he was involved 13 in three similar case to that of the claimant at the 14 News of the World, which had each taken the same path. 15 In each case, the journalist was unreasonably subjected 16 to disciplinary proceedings, realised the newspaper felt 17 his face did not fit any more and that they were trying 18 to drive him out, and asked him if a severance package 19 was available to resolve the matter." 20 I'll ask Mr Turner about those incidents tomorrow, 21 but do you have any knowledge about those incidents? 22 A. Only from what Mr Turner has told me. 23 Q. In that case, I'll ask the source directly tomorrow. 24 A. Yeah. 25 Q. Could you please turn to page 25 internally and Page 53</p>	<p>1 "Want him out as quickly and as cheaply as 2 possible.' 3 "We find that Mr Coulson's desire to get rid of the 4 claimant as quickly and cheaply as possible was his 5 desire not only on 19 July 2006 but as early as August 6 2005." 7 I could read a lot more, but I'm trying to focus on 8 the paragraphs that are illustrative. They agree with 9 everything you say about the period when you were ill. 10 That can be read in detail. At paragraph 189 onwards -- 11 so that's over on page 38 -- they give their overall 12 view of the evidence of the witnesses. 13 "We have considered our overall view of the evidence 14 of the witnesses, having taken into account all the 15 evidence provided to us, including documentary evidence. 16 We have given some examples above of the ways in which 17 we were not impressed with the evidence of witnesses of 18 respondent. These are examples only, and there were 19 many other occasions when we felt that witnesses of the 20 respondent were giving evidence that was evasive or 21 unsatisfactory in other respects. We were, overall, far 22 more impressed with the evidence of the claimant and his 23 witnesses. Even although the claimant remains, we 24 understand, unwell, his evidence appeared far more 25 straightforward and plausible than that of the Page 55</p>
<p>1 paragraph 118, please. The Tribunal says this: 2 "We have given some examples of exchanges amongst 3 the senior management team. The impression given to us 4 from reading the documentation and considering the 5 evidence as a whole was that the senior management team 6 were going through a cynical process of giving an 7 appearance of fairness towards him [you]. By giving him 8 a first warning, a final warning and then dismissal, 9 they hoped to avoid a successful unfair dismissal claim. 10 Pursuing a twin approach of both taking disciplinary 11 action and discussing a settlement that would lead to 12 a possible compromise agreement would also be a way of 13 being able to settle a possible claim at a modest 14 level." 15 Now I'm going to turn to paragraphs 129 and 130. 16 I don't have very much to go, I promise. 17 On 18 July 2006, the claimant sent an email to 18 Mr Kuttner and Mr Dunn. This is where they essentially 19 accept that you had been taken ill and that they knew 20 from that date that you were ill and that the advice had 21 been to refrain from work for three weeks and had been 22 placed on medication. Paragraph 130: 23 "Mr Wallis reported to Mr Coulson. Mr Coulson's 24 response is instructive. He stated by email to 25 Mr Wallis, dated 19 July 2006: Page 54</p>	<p>1 respondent's witnesses." 2 Then at 190, I don't need to read it out, but they 3 again refer to the respondent's longstanding desire to 4 remove you and they find that they were not persuaded 5 that capability was the reason or principal reason for 6 your dismissal. You see that? 7 A. Mm. 8 Q. Last of all, I turn to their conclusions over the page, 9 page 40. Paragraph 195 is probably the only 10 paragraph that we need to read parts of: 11 "If capability was not the reason or principal 12 reason for the claimant's dismissal, what was it? The 13 original source of the hostility towards the claimant 14 was Mr Coulson, the then editor of the 15 News of the World, although other senior managers either 16 took their lead from Mr Coulson and continued with his 17 motivation after Mr Coulson's departure or shared his 18 views themselves. Mr Coulson did not attend 19 the Tribunal to explain why he wanted the claimant 20 dismissed." 21 I don't think we really need to read anything else. 22 We note in passing that they conclude at 229 that 23 dismissing you was an act also of direct disability 24 discrimination. 25 We know that this matter then went on to a remedy Page 56</p>

<p>1 hearing and you were awarded almost, not quite,                  2 £800,000. You obviously obtained that compensation.                  3 Did you seek anything else from News of the World? Did                  4 you seek an apology or --                  5 A. Yeah.                  6 Q. Tell us about that?                  7 A. I instructed my legal team to ask them for an apology.                  8 Q. Was that in the light of --                  9 A. I felt I was owed an apology.                  10 Q. In the light of this judgment?                  11 A. In the light of this judgment, in the light of the years                  12 of terrible treatment I suffered at their hands.                  13 Q. So did your solicitor write to them and seek an apology?                  14 A. Yes. Along with some other things that I wanted,                  15 including my company car, et cetera, and no apology was                  16 ever forthcoming. There was no suggestion even that                  17 they would apologise.                  18 Q. Did they appeal this decision?                  19 A. They didn't just appeal it. They appealed it three                  20 times.                  21 Q. Were they successful?                  22 A. No.                  23 LORD JUSTICE LEVESON: Did it have a full hearing in front                  24 of the employment Appeal Tribunal?                  25 A. The appeal? Yes. There was obviously very lengthy</p> <p style="text-align: center;">Page 57</p>	<p>1 A. Yes.                  2 Q. Let me read you just one paragraph from the evidence of                  3 Mr Chapman to that committee. It's actually on the                  4 second page. I know there's a blank page in between for                  5 those of us who have that copy, but if you look at the                  6 second page that actually has anything written on it, if                  7 one looks halfway down the page, there's a large                  8 paragraph in the middle. In the context of being asked                  9 about why Mr Goodman was given a large payout,                  10 Mr Chapman says this:                  11 "One thing that Daniel has not mentioned [that's                  12 Daniel Cloke] is that there -- I have noted that on the                  13 editorial side at News International, there has                  14 certainly always been more of a feeling of family                  15 compassion and humanitarian stuff, which, as a person on                  16 the commercial side at News International, I am not sure                  17 that I would enjoy. I do not think that there is                  18 anything sinister in that; I just think there is quite                  19 a big feeling of family on newspapers. When someone                  20 messes up badly and commits a crime, I think there was                  21 also a feeling that, yes, they have done a terrible                  22 wrong, but their family should not suffer. I am not                  23 sure that applies through the business to the rather                  24 newer commercial side at News International."                  25 Had you committed a crime, Mr Driscoll?</p> <p style="text-align: center;">Page 59</p>
<p>1 delays as well, after that. They even went to the Court                  2 of Justice for an injunction to stop me going any                  3 further forward. There were three different appeals                  4 that -- Mr Turner will be able to go into probably a bit                  5 more detail.                  6 MS PATRY HOSKINS: We can ask Mr Turner better that.                  7 LORD JUSTICE LEVESON: Presumably if there was a decision of                  8 the EAT, we could read that?                  9 A. Yes, actually, Mr Turner will be able to supply those.                  10 MS PATRY HOSKINS: I hadn't understood there to be a full                  11 hearing, so I can find out that overnight.                  12 LORD JUSTICE LEVESON: Please.                  13 MS PATRY HOSKINS: 2007, which is when you were dismissed,                  14 is also the year that Mr Mulcaire and Mr Goodman were                  15 convicted.                  16 A. Yes.                  17 Q. Can I ask you to if you have a document which I'm not                  18 sure has been handed up to you, sir. I'll cause that to                  19 be handed up. It's an extract from the CMS committee on                  20 phone hacking from 6 September 2011. (Handed)                  21 LORD JUSTICE LEVESON: Thank you.                  22 MS PATRY HOSKINS: Here, senior executives at                  23 News International are being asked about why, given that                  24 Mr Goodman had been convicted of a criminal offence, he                  25 attracted such a large payout.</p> <p style="text-align: center;">Page 58</p>	<p>1 A. No. Certainly not.                  2 Q. Do you agree with the sentiments of Mr Chapman there                  3 about the family feeling?                  4 A. It's almost laughable, really, that he would even                  5 suggest something like that. This is a business. These                  6 people went to jail for something that they had done,                  7 and to give this impression of this lovely family                  8 atmosphere -- as I said, it's laughable. I asked for                  9 help with my legal expense early on, when I knew                  10 I needed legal consultation because of my situation on                  11 the paper, and that was refused, and as you've seen in                  12 my judgment, the treatment I suffered -- I don't know                  13 what's family about that. It certainly wasn't an                  14 embrace of a kind nature.                  15 So it's just -- I don't know. I'd love to know what                  16 he's actually describing there, because it's certainly                  17 not the News of the World.                  18 Q. You say that you asked for payment of your legal costs                  19 or help with your legal costs?                  20 A. Initially, yes, we asked for that.                  21 Q. We know that Mr Mulcaire and Mr Goodman had --                  22 A. They seemed to give them a lot of help, yeah, but I got                  23 none.                  24 Q. But that was not your experience?                  25 A. No.</p> <p style="text-align: center;">Page 60</p>

<p>1 Q. I think there was something you wanted to say about the 2 treatment of Mr Thurlbeck in comparison to the way you 3 were treated. He, of course, was found by a judge of 4 the High Court to have, in effect, blackmailed some 5 ladies in respect of the Max Mosley story? 6 A. Yes. 7 Q. And certainly was severely criticised by the judge. He 8 didn't lose his job? 9 A. No, and that was a great help during my tribunal. The 10 Max Mosley case did help to highlight the disparity of 11 treatment. 12 LORD JUSTICE LEVESON: 107.8 of the judgment. 13 A. Yes. 14 MS PATRY HOSKINS: Thank you. You don't have it here. 15 Sorry, Mr Driscoll. 16 LORD JUSTICE LEVESON: No, no, of the ET. 17 MS PATRY HOSKINS: Oh, sorry, I thought you meant the High 18 Court judgment. 19 LORD JUSTICE LEVESON: No. 20 MS PATRY HOSKINS: That's very helpful then. We could have 21 a look at that if you wanted. 107.8. 22 LORD JUSTICE LEVESON: Page 23. 23 MS PATRY HOSKINS: Sorry, sir, I thought you were referring 24 to Mr Justice Eady's judgment. 25 LORD JUSTICE LEVESON: My fault. Page 61</p>	<p>1 cross-checked it against the Mulcaire notes and my name 2 hasn't appeared, but they've told me that they'll get 3 back to me. They have more stuff to go through to 4 cross-check my name against. 5 LORD JUSTICE LEVESON: What's the date of the email? 6 A. It was about -- in fact, it was three weeks after my 7 judgment arrived. I can only think maybe it was 8 a former colleague who felt that once my judgment in my 9 tribunal had finished, maybe they were able to tell me. 10 I would still love to know who it was. 11 LORD JUSTICE LEVESON: Do we have a copy of this email? 12 A. No, not in these notes. 13 MS PATRY HOSKINS: Can you provide that? 14 A. Yes. 15 LORD JUSTICE LEVESON: It's three weeks after September 16 2008? 17 A. Yes. 18 LORD JUSTICE LEVESON: Yes, well, I would like to see that 19 if you don't mind. 20 A. Certainly. 21 MS PATRY HOSKINS: Can I ask you about the consequences of 22 all of this, please, how your dismissal has affected 23 your career. 24 A. Well, it's finished it. 25 Q. Why do you think that is? Why has it finished it? Page 63</p>
<p>1 MS PATRY HOSKINS: I'm sure it's all mine. 2 A. That's right, yes. As I said, it did highlight what 3 I knew all along, that I was being treated completely 4 differently to other people on the paper, in a very 5 cynical manner. 6 Q. Why were you treated differently, in your view, 7 Mr Driscoll? 8 A. The editor had decided he wanted me out, so his 9 executives went along with that instruction by any means 10 possible to find ways to get me off the paper. And here 11 we had a colleague of mine, Neville Thurlbeck, had done 12 things that I wouldn't dream of doing myself, and we 13 asked the executives that appeared at my tribunal: "Was 14 Neville Thurlbeck disciplined for any of this stuff?" 15 and they sort of vaguely said that they couldn't 16 remember, but we knew that he hadn't and there was 17 clearly a very different set of instructions towards me, 18 instead of Neville Thurlbeck. 19 Q. I understand that you received an anonymous email which 20 may have indicated to you that your phone was hacked 21 during the time that you were bringing these employment 22 tribunal proceedings? 23 A. That's right, yes. 24 Q. Can you tell us where you are with that? 25 A. I've been in contact with the police and so far they've Page 62</p>	<p>1 A. I'm the guy who's taken on the bosses, really. You 2 know, tribunals like this in the newspaper industry are 3 extremely rare. Normally there's some kind of 4 out-of-court settlement. For it to go the distance is 5 very rare, so who would want to employ someone who's 6 taken on the boss and won and is also happy to talk out 7 about it? I'm happy to highlight exactly how bad it was 8 and how bad the treatment I had to suffer was, so 9 I can't imagine any editor wanting to snap me up 10 tomorrow. 11 Q. Have you tried to apply for other jobs? 12 A. I have, and nothing's come forward. 13 Q. Have you had any other contact, direct or indirect, with 14 News of the World since then? 15 A. There was evidence in my tribunal from the managing 16 editor of the Sun at the time, who actually said that he 17 would consider giving me a probation period if there was 18 a job going on the Sun, to wait and see how I would cope 19 with that, which my barrister at the time felt was 20 a discriminatory comment, but it gave an impression to 21 the severity of the -- sort of the impression that the 22 rest of Fleet Street had towards me. You know, if 23 you've been ill, you're seen that you're weak and you've 24 shown signs of frailty, and I certainly did that and 25 I also showed signs that I wasn't happy to sit back and Page 64</p>

16 (Pages 61 to 64)



<p>1 let it happen without some kind of fight back.  2 LORD JUSTICE LEVESON: That's the absolute reverse of  3 frailty.  4 A. Well, as it turned out, it did, but my illness,  5 I suppose, they would class as a frailty, yeah.  6 LORD JUSTICE LEVESON: How are you now?  7 A. I'm still on medication, but I'm certainly a lot  8 stronger now that it's all behind me.  9 LORD JUSTICE LEVESON: Good.  10 MS PATRY HOSKINS: To what extent do you attribute the  11 illness that you suffered from to the treatment that you  12 received at the News of the World?  13 A. Oh, it's entirely down to that. I was a very fit and  14 healthy person until 2005.  15 Q. Had you ever suffered from depression before?  16 A. Never, no, no.  17 Q. There are two things that are very clear from the  18 evidence that you've given, Mr Driscoll. First of all,  19 in many respects you thought the News of the World was  20 out of control, and two, that you were relatively angry  21 with them for the treatment that you received,  22 undoubtedly with justification. Some might say that  23 your expose of the dark arts at the News of the World is  24 untruthful and may well be because you hold this grudge  25 against them. What do you say about that?</p> <p style="text-align: center;">Page 65</p>	<p>1 behalf. I was just very unhappy that they'd somehow  2 tried this line of defence, which just wasn't fair to  3 the staff.  4 And you'd have hoped that when Colin Myler came in  5 after Andy Coulson had gone, that things would have  6 improved, but clearly they didn't, and I know another  7 thing that upset me and Sean was that Andy Coulson gave  8 the impression that he was ultimately responsible,  9 that's the reason he resigned, and we knew it went a lot  10 further than that.  11 Q. Okay, we'd better pause there.  12 I want to ask you a question about regulatory  13 change. You've indicated to me that you might want to  14 say a few words about possible changes to the regulatory  15 regime, which might assist others. Do you have anything  16 to say about this?  17 A. Clearly the Press Complaints Commission has suffered  18 quite a battering in the last sort of year or so. In my  19 experience, certainly on sport, any complaint to them  20 was taken very seriously and editors would take it very  21 seriously. So it's -- I don't see how it's right to  22 suddenly say that we need another body or they will  23 never work unless they have enough power, because in my  24 experience, they were working. Maybe they -- the powers  25 weren't -- didn't extend to sorting out, obviously, the</p> <p style="text-align: center;">Page 67</p>
<p>1 A. I'm sure News of the World would love people to believe  2 that.  3 Q. But is it right?  4 A. When I spoke to the New York Times -- me and Sean Hoare  5 spoke to the New York Times, I wasn't really sort of  6 whistle-blowing. I suppose I was blowing a fuse more  7 than anything else, because I was very upset in the  8 treatment -- no, I was upset about how the journalists  9 seemed to be getting all the blame for everything that  10 had gone on at the News of the World, because I knew  11 that the executives were in charge of all of this. They  12 knew everything that was going on underneath, and it was  13 easy for them to shove all the blame to a guy on the  14 front line who goes out getting stories, who runs around  15 the world and the country trying to find them stories to  16 sell their papers, and I felt that was very unjust, and  17 I know when I tried to get Sean Hoare to come forward  18 and talk, he felt the same as well, that it just wasn't  19 fair that journalists on news were getting all the blame  20 for everything that had gone on because of the culture  21 in that newsroom. You know, my tribunal found it was  22 a culture of bullying. I would say it was a culture of  23 lying a lot of the time. They were covering stuff up.  24 They were trying to convince people that it was this  25 rogue reporter. So there was no axe to grind on my</p> <p style="text-align: center;">Page 66</p>	<p>1 illegal practices that were going on maybe at certain  2 papers, but then they weren't known at the time. The  3 PCC maybe just needs to be bolstered, in my opinion,  4 because in all the stories that I heard of at the  5 News of the World or worked on, if the PCC ever got  6 a complaint or it was mentioned to them, it was taken  7 very seriously. It was considered something you had to  8 worry about.  9 MS PATRY HOSKINS: Do you want to assist us with any  10 particular ways in which it would be bolstered or is  11 that just a general comment you would like to make?  12 A. No, I think that is a very difficult conversation, about  13 how to give the PCC enough weight.  14 LORD JUSTICE LEVESON: But how can you have a regulator to  15 which you don't have to be a member?  16 A. No, I agree with that. I think everyone should be  17 a member of it. Otherwise it doesn't work. Every paper  18 in Fleet Street, and not just papers; TV websites,  19 the --  20 LORD JUSTICE LEVESON: TV is different.  21 A. But I'm saying this is maybe where it falls short.  22 Maybe there needs to be an all-encompassing body to mete  23 out fairness, as well, on all walks of media life. But  24 I think it was nearly there, but just didn't obviously  25 clearly have enough weight behind it. How you would</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 correct that would be quite a lengthy discussion,  2 I think.  3 MS PATRY HOSKINS: Mr Driscoll, thank you very much indeed.  4 Is there anything that you would like to add?  5 A. No.  6 MS PATRY HOSKINS: Sir, by some miracle, that's been exactly  7 90 minutes. Could I release Mr Driscoll?  8 LORD JUSTICE LEVESON: Thank you very much, Mr Driscoll.  9 MR DAVIES: Could I ask one question?  10 LORD JUSTICE LEVESON: What's the topic?  11 MR DAVIES: I just wanted to clarify the nature of the  12 complaint that Arsenal Football Club made.  13 LORD JUSTICE LEVESON: Very good.  14 Questions by MR DAVIES  15 MR DAVIES: Mr Driscoll, the employment tribunal recorded,  16 paragraph 91 of judgment, that amongst the complaints by  17 the press officer was that although they had been upset  18 in the past when players' quotations had been spun and  19 taken out of context, he -- I think that's a reference  20 to you -- was putting words into Mr Toure's mouth that  21 he had not said. Is that an accurate record of the  22 complaint that Arsenal made?  23 A. An accurate record of the complaint, yes.  24 MR DAVIES: Thank you.  25 LORD JUSTICE LEVESON: I am going to ask the question that</p> <p style="text-align: center;">Page 69</p>	<p>1 witnesses that deal with module 1 and in the middle or  2 slightly later in February, we shall commence module 2.  3 I think we've previously requested those who wish core  4 participant status to make an application in that  5 regard, but I think it's probably sensible to repeat  6 that request and to ask for any further application for  7 core participant status in relation to module 2 to be  8 made as soon as possible, but no later than the end of  9 the second week in January, so that I can make decisions  10 about that and proceed accordingly.  11 Does anybody have anything else that they wish to  12 raise? I'm sure these early days won't become a habit.  13 Thank you very much.  14 (3.04 pm)  15 (The hearing adjourned until 10 o'clock the following day)  16  17  18  19  20  21  22  23  24  25</p> <p style="text-align: center;">Page 71</p>
<p>1 follows on. It might be an accurate record of the  2 complaint. Is it an accurate record of what happened?  3 A. No, no, not at all. I actually took legal counsel about  4 taking legal action against Arsenal Football Club over  5 comments they made by email to my paper and sports  6 editor, but it was out of time by the time my tribunal  7 had finished, so I couldn't do anything about it.  8 LORD JUSTICE LEVESON: Issues of qualified privilege in any  9 event. Was what you put end the paper reflected by  10 either the recording or the shorthand notes that you  11 wrote?  12 A. Yes, yes. Definitely, yes, which I demonstrated to the  13 Tribunal and my sports editor in the -- in my  14 disciplinary hearing.  15 LORD JUSTICE LEVESON: Thank you very much.  16 MS PATRY HOSKINS: Thank you, sir. Can I release  17 Mr Driscoll?  18 LORD JUSTICE LEVESON: Yes. Thank you very much,  19 Mr Driscoll.  20 A. Thank you.  21 MS PATRY HOSKINS: Sir, that was our only witness this  22 afternoon, but I understand there are some matters that  23 you wish to raise.  24 LORD JUSTICE LEVESON: Yes.  25 I am conscious that we've moving through the</p> <p style="text-align: center;">Page 70</p>	

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