

<p>1 Thursday, 2 February 2012 2 (10.00 am) 3 LORD JUSTICE LEVESON: Good morning. 4 MR BARR: Good morning, sir. We're going to start today 5 with witnesses from the mobile phone companies, 6 Mr Blendis from Everything Everywhere, Mr Hughes from 7 Vodafone and Mr Gorham from Telefonica. 8 LORD JUSTICE LEVESON: Very good. 9 MR BARR: We're going to listen to them all together, sir. 10 Can I ask that the gentlemen are sworn in, please. 11 MR JAMES BLENDIS (affirmed) 12 MR ADRIAN GORHAM (sworn) 13 MR MARK HUGHES (sworn) 14 Questions by MR BARR 15 MR BARR: Can I start, please, Mr Hughes, with you. Could 16 you tell us the position that you hold and a little bit 17 about your professional background, please? 18 MR HUGHES: Yes, sure. I'm currently head of fraud risk and 19 security for Vodafone UK. I have been in that position 20 since August 2011 and I've worked in the fraud risk and 21 security department in Vodafone since October 2006. 22 Q. Mr Gorham, if I could ask you the same question, please. 23 MR GORHAM: I'm the head of fraud and security for 24 Telefonica O2, I've been in that role for ten years and 25 have been in the industry for 13.</p> <p style="text-align: center;">Page 1</p>	<p>1 MR GORHAM: Yes. 2 MR BLENDIS: Yes. 3 Q. Has that been the position since the introduction of 4 digital transmission or is it more recent than that? 5 MR HUGHES: My understanding is it's been encrypted for the 6 whole period of time from the introduction of digital. 7 It's always been encrypted. 8 MR BLENDIS: I believe that's the case, yes. 9 LORD JUSTICE LEVESON: You're going to have to speak up and 10 make sure that you're heard, because otherwise we won't 11 pick up what you're saying. Thank you. 12 MR BARR: Can I now move to the question of default PIN 13 numbers. It's common ground that all of you have 14 systems in place to guard access to voicemail, which is 15 governed by a PIN number. Is it right, Mr Hughes, that 16 at one point in time Vodafone phones had a default PIN 17 setting, so when the phone arrived, there would be a PIN 18 which anyone would know until it was changed? 19 MR HUGHES: So 2001 and before, there was a default PIN 20 setting on the Vodafone network. 21 Q. And when was the change made? 22 MR HUGHES: In 2001. I'm not sure of the exact month, but 23 it was in 2001. 24 Q. What brought about that change? 25 MR HUGHES: I'm not sure exactly what triggered the change,</p> <p style="text-align: center;">Page 3</p>
<p>1 Q. Mr Blendis? 2 MR BLENDIS: Vice-president for legal and regulatory affairs 3 for Orange and T-Mobile. I've been in that position 4 since the merger in 2010. Previously in a similar 5 position for T-Mobile. 6 Q. Thank you. I'm now going to ask each of you if the 7 witness statement submitted either by yourself or by 8 someone else from your organisation is true and correct 9 to the best of your knowledge and belief. Mr Hughes? 10 MR HUGHES: Yes, it is. 11 Q. Mr Gorham? 12 MR GORHAM: Yes, it is. 13 Q. Mr Blendis? 14 MR BLENDIS: Yes. 15 Q. Your witness statements deal with some matters of 16 disclosure which I need not deal with now, and they also 17 tell us a little bit about the approach that each of 18 your companies has taken to voicemail security. It's 19 that issue that I want to explore first of all. What 20 I'm going to do is take you through a number of the 21 issues and ask you what your company's approach is now 22 and what it's been in the past. So can I start first of 23 all, is the transmission of the actual voicemail 24 encrypted? 25 MR HUGHES: Yes, it is.</p> <p style="text-align: center;">Page 2</p>	<p>1 but with any of our products and services, we're always 2 looking at ways to improve the security, so what the 3 trigger was I can't be sure now, but it was changed in 4 2001. 5 Q. What was the position, please, Mr Gorham, at 6 Telefonica O2? 7 MR GORHAM: We previously had a default PIN that was sent to 8 customers and it was down to the customer if they wanted 9 to change that default PIN or leave it at default and 10 that was the case until 2005/2006 when we had the 11 voicemail issue and it was at that point that that 12 security was then enhanced. 13 Q. Are you referring there to the well-publicised 14 convictions of Mr Mulcaire and Mr Goodman? 15 MR GORHAM: Yes. 16 Q. Mr Blendis, can you tell us what the position has been 17 at Orange and T-Mobile? 18 MR BLENDIS: Orange has never had a default PIN. T-Mobile 19 had default PIN prior to 2002, and that was taken away 20 late 2002. 21 Q. And what was the reason for taking it away in 2002? 22 MR BLENDIS: I don't know precisely, but I can only imagine 23 the feeling was that it would add to the security if 24 there was no default PIN. 25 LORD JUSTICE LEVESON: So just to understand this, and</p> <p style="text-align: center;">Page 4</p>

<p>1 I think I've got the way in which it worked, this was 2 a mechanism whereby people would listen to their 3 messages from a remote telephone? 4 MR BLENDIS: Yes. 5 LORD JUSTICE LEVESON: Because they can always get into 6 their voicemail from their own mobile but if you wanted 7 to dial in from a landline, you could pick it up? 8 MR BLENDIS: Correct. 9 LORD JUSTICE LEVESON: And there had to be some 10 distinguishing feature to make sure that you were 11 getting your own messages, but of course if people just 12 had the default number, then it was easy for that to be 13 tried? 14 MR GORHAM: That's correct, yes. 15 MR HUGHES: Yes. 16 MR BARR: Can I ask you, Mr Hughes, while we're on this 17 subject, the Inquiry has heard evidence from Mr Nott, 18 who says that he drew to Vodafone's attention the 19 security vulnerability that existed from having 20 a default PIN in the late 1990s, and indeed the Inquiry 21 has had evidence that the matter was dealt with by 22 Vodafone in a radio interview soon afterwards, at which 23 time the advice was to change PIN number. Why didn't 24 Vodafone do more back in the late 1990s when Mr Nott 25 drew the problem to your company's attention and instead</p> <p style="text-align: center;">Page 5</p>	<p>1 postcode, et cetera, they would be able to ask the 2 customer service agent to either (a) set up remote 3 access to their voicemail, should they require it, and 4 that would involve needing a PIN number, and the 5 customer service agent would be able to set the PIN 6 number to either a number of their choosing, which may 7 be easily rememberable, or the customer could ask for 8 the PIN number to be set up to a number that they 9 choose. Conversely, if it was already set up, they 10 could ask for the PIN to be reset and again the same 11 criteria would apply. 12 Q. Does that system remain in place or not? 13 MR HUGHES: It doesn't remain in place. That was changed 14 when the criminality came out and we were aware of what 15 the attack methods were. We made changes to take away 16 from all of our customer service agents either 17 visibility of the PIN or for the ability for them to be 18 able to reset the PIN. We made changes to the system so 19 that the customer would go through some guidance on the 20 handset and the PIN number would be texted to the 21 registered handset and SIM, and it would also reject any 22 weak PINs, any double numbers, sequential numbers, to 23 make sure that it was as secure as possible. 24 Q. Mr Gorham, can I ask you to deal with the same issue, 25 please, from the Telefonica O2 perspective?</p> <p style="text-align: center;">Page 7</p>
<p>1 wait until 2001 to introduce a more secure system? 2 MR HUGHES: So the simple answer as to why is I don't know 3 why that wasn't done at that point. The person that 4 represented Vodafone at the time in the Radio 5 5 interview has sadly passed away some years ago, and in 6 preparation for coming to this Inquiry we've tried to 7 find people that perhaps would be aware of what was 8 happening at that point, but we've been unable to do so. 9 The default PIN setting, as you've heard, was pretty 10 much an industry standard at that time and it was 11 changed in 2001. Whether that was in relation to the 12 claims -- the correct claims at the time of Mr Nott, 13 I simply cannot be sure. 14 Q. Can I ask now about what is sometimes referred to as 15 temporary PINs, but they're PIN numbers which can be set 16 by customer services departments if a customer rings in 17 and asks for that to happen if they, for example, have 18 forgotten their PIN number. Did Vodafone have 19 a temporary PIN system? 20 MR HUGHES: At the time of the criminality that was 21 happening in 2006, a customer could call through to 22 a customer service agent, and once they'd authenticated 23 by answering some specific personal credentials about 24 themselves as a customer, which would include items such 25 as the date of birth, the registered address, their</p> <p style="text-align: center;">Page 6</p>	<p>1 MR GORHAM: Prior to 2005, if a customer contacted us, we 2 could reset their PIN back to the default and then the 3 customer could choose their new PIN. So at no stage 4 would we know what the PIN actually was. We would 5 purely reset it back to default and the customer could 6 then change it. The same as with Vodafone, they would 7 pass the security questions and validation. 8 Since that date, what we now do is we actually send 9 the new PIN number. So if they've locked their account 10 out, if they can't get in, we will actually send the new 11 PIN number to their mobile phone so they will receive 12 a text with that new PIN number on, so again our staff 13 are not aware of their actual specific PIN. 14 Q. And Mr Blendis? 15 MR BLENDIS: So customers who want to set up their voicemail 16 will call customer services and they can put their own 17 unique PIN on at that point in time, so if they do that, 18 then it will be secure. 19 We also now have a system where if somebody calls in 20 in those circumstances to change the PIN, a text will be 21 sent back to the phone so that the owner of the phone 22 will see that that's been changed, so they'll be 23 notified. 24 Q. If that's the position now, was the historic position 25 that your customer service people would know a PIN when</p> <p style="text-align: center;">Page 8</p>

<p>1 it was changed or has the system that you've just 2 outlined always been in place? 3 MR BLENDIS: The PIN is not visible and never has been 4 visible to the customer service agent in the system, so 5 it's not stored in the system. They would know because 6 of the conversation because they'd set the PIN at that 7 time what that PIN was, but it wouldn't be stored. 8 Q. When -- 9 MR BLENDIS: That's always been the case. 10 Q. Is that still the case now? 11 MR BLENDIS: Yes. 12 Q. Does that mean there's still potentially a vulnerability 13 if the member of staff is the subject of a successful -- 14 I think the term is successful social engineering or 15 blagging? 16 MR BLENDIS: If somebody socially engineers the account and 17 convinces the customer service agent and changes the PIN 18 for their own purposes, a text will be sent back to the 19 customer phone, so the customer, who obviously isn't the 20 party that's blagging the account, would be notified. 21 Q. How long has that automatic text notification been in 22 place? 23 MR BLENDIS: That's since 2006, that's a change that we've 24 put in place. 25 Q. Was that again because of the exposure in 2006 of</p> <p style="text-align: center;">Page 9</p>	<p>1 restrict what we call easily guessable PINs. So you 2 wouldn't be allowed a PIN that was say 0000 or 1234. So 3 the enhanced security we're putting in place will 4 hopefully close that down as well. 5 MR HUGHES: That's the same for Vodafone. 6 LORD JUSTICE LEVESON: Of course, you could choose your 7 birthday, and your computer won't know the birthday of 8 your customer. 9 MR BLENDIS: Our customer service agents are now being 10 trained specifically on this issue, so there's a 11 heightened awareness with our customer service agents. 12 We also have training specifically for blagging. So 13 they would know not to allow a customer to put their 14 date of birth, and if there was a suspicion of that, if 15 it was 1971, for example, then they would probably say, 16 "Is that your date of birth? Could you select something 17 more secure?" 18 MR BARR: Mr Gorham, could you help us with the position at 19 O2 with easily guessable PINs? We've heard from the 20 other two witnesses that they do now have systems in 21 place to prevent them. Does O2? 22 MR GORHAM: Again the same for us. The easily guessable 23 numbers we don't actually have PINs that you can use 24 that relate to those numbers. 25 Q. And in terms of educating users, which Mr Blendis</p> <p style="text-align: center;">Page 11</p>
<p>1 illegal activity? 2 MR BLENDIS: Yes. I think it's fair to say that security 3 has always been important to us. It's a significant 4 issue for us, as it is for our customers, so we're 5 always looking to improve that. That was an initiative 6 we put in place in 2006 and we have a new raft of 7 initiatives coming through that will make further 8 improvements going forward. 9 LORD JUSTICE LEVESON: Is the default -- and I don't want to 10 expose your security to scrutiny -- but is the default 11 a complex or is the number complex or can it be 12 straightforward? I appreciate you'll reject 1111, but 13 for some security devices it has to be a combination of 14 capitals and lower case and numbers and symbols. I'm 15 sure you understand. Is it a straightforward number or 16 can you make it more complex? 17 MR GORHAM: In our case, it's a four digit number is the 18 default, but until the customer has changed that to 19 their own unique number, they cannot use the voicemail 20 facility. 21 LORD JUSTICE LEVESON: Oh, I see. 22 MR GORHAM: So the customer has to go in and has to actually 23 put a unique number in before they can use the voicemail 24 service. 25 MR BLENDIS: As part of our changes, we would actually</p> <p style="text-align: center;">Page 10</p>	<p>1 touched upon a moment ago, perhaps I could ask Mr Hughes 2 what steps is Vodafone taking at the moment to educate 3 users to change PINs and to look out for signs of 4 unlawful interception? 5 MR HUGHES: Anyone in our call centre environment who deals 6 with customer information, we provide them with a level 7 of training and guidance to make sure, as with the other 8 networks that we've heard from, that they're aware of 9 the types of attacks that can happen and the types of, 10 you know, as you've put it blagging that can happen and 11 that they've got an awareness to make sure that they can 12 deal with that. 13 The other thing we try and make our customers aware 14 of is the PINs themselves, because, as you say, if they 15 put a date of birth, the system may not know that and it 16 may not be to the system an easy guessable PIN, it's 17 really important that we keep the messages going to our 18 clients that they should treat any PIN numbers that they 19 set up on the mobile communications network exactly as 20 they would with their banking credentials and they must 21 keep them secure, whether they're default or not. If 22 the pass may have been online, they must keep their PIN 23 numbers secure. 24 Q. Mr Gorham? 25 MR GORHAM: We have comprehensive training for our staff</p> <p style="text-align: center;">Page 12</p>

<p>1 when they join the business. They do computer based 2 training and part of that takes them through social 3 engineering and explains how it can happen, how we can 4 help prevent it. We also do mystery shopping on our 5 staff, so we actually have an organisation that tries to 6 blag information out of our staff, so we can continually 7 learn what new MOs are and how we can better protect our 8 customers. And we do roadshows for our people. So 9 there's continued training.</p> <p>10 Exactly the same with our customers. We give 11 information, it's on our portal, we have guru sort of 12 video clips to try and explain to customers how they can 13 actually keep their messages secure and what they can do 14 to protect their own information.</p> <p>15 MR BLENDIS: The only thing I'd add to that is we also now 16 have a process where if a customer service agent 17 suspects that they're not talking to the genuine 18 customer, they have a process whereby they will call the 19 customer. So if they can go through a conversation, 20 terminate the call, call the customer back. If it's 21 a blagger, they're usually not calling from the handset, 22 so the customer would get a call back to the handset to 23 warn them or check that it was them. We think that will 24 hopefully close down as far as we can the problem of 25 social engineering.</p> <p style="text-align: center;">Page 13</p>	<p>1 inquiry.</p> <p>2 Q. Mr Blendis?</p> <p>3 MR BLENDIS: Yes, similar system. If there are three 4 unsuccessful attempts, then the voicemail will block and 5 they would have to call into customer services to reset 6 it and go through security checks.</p> <p>7 Q. How long has that been the case?</p> <p>8 MR BLENDIS: That's always been the case on Orange.</p> <p>9 Q. And on T-Mobile?</p> <p>10 MR BLENDIS: On T-Mobile it will drop, so after three 11 unsuccessful attempts it will disconnect and there will 12 then be a 30 minute gap and they will be able to retry 13 after that. We are trying to align the systems, so we 14 have a complete new voicemail platform that's intended 15 to deal with a lot of these issues and align the 16 systems.</p> <p>17 Q. Is the owner of the account notified of unsuccessful 18 attempts on the T-Mobile accounts or is that a matter 19 which needs tightening up?</p> <p>20 MR BLENDIS: I think that's something that's in the process 21 to align the two brands. I don't think that's the case 22 currently.</p> <p>23 Q. Can I ask now about when there are multiple simultaneous 24 attempts to access a voicemail? Is there any automatic 25 lock-out procedure in that event on Vodafone accounts?</p> <p style="text-align: center;">Page 15</p>
<p>1 Q. Can I ask now about what happens when somebody enters 2 the wrong PIN repeatedly, at what point there's an 3 automatic lockdown of the account. Mr Hughes, what's 4 the position at Vodafone now?</p> <p>5 MR HUGHES: As soon as we made the changes in 2006, one of 6 the other features that we brought in was to ensure that 7 if anybody tries to dial the unique voicemail number of 8 the customer remotely, so not from the handset, and they 9 enter even one wrong digit, they make one mistake in 10 entering that PIN, a text message is sent to the 11 registered handset and SIM of that customer account 12 which says something along the lines of, "An 13 unsuccessful attempt has been made to listen to your 14 voicemail remotely. Please contact a member of our 15 customer services team immediately if this was not you."</p> <p>16 Q. What's the position at O2 please?</p> <p>17 MR GORHAM: After three unsuccessful attempts to get into 18 the voicemail box, your voicemail box is locked, which 19 means it can't be accessed for a period of 30 minutes. 20 At the same time, a new PIN is sent to the actual 21 registered handset, so the customer then will receive 22 a new PIN number that they must use to access their 23 voicemail, then they have to reset their own PIN again.</p> <p>24 Q. How long has that system been in place?</p> <p>25 MR GORHAM: That's been in place since 2006, following the</p> <p style="text-align: center;">Page 14</p>	<p>1 MR HUGHES: I'm not sure, I'd have to check that and write 2 to you separately.</p> <p>3 MR GORHAM: It would be the same as my previous answer. 4 Once there's been three attempts, the account would 5 lock.</p> <p>6 Q. So it doesn't matter --</p> <p>7 MR GORHAM: It doesn't matter where they come from.</p> <p>8 Q. I'm asking now about two simultaneous attempts.</p> <p>9 MR GORHAM: It would count those as two, I believe. I'd 10 have to check and come back.</p> <p>11 MR BLENDIS: I know that's part of the new platform, so that 12 will prevent that from happening going forward. You 13 won't be able to have dual access to the same box.</p> <p>14 Q. Now a question which your evidence may already have 15 answered. I was going to explore whether the number of 16 digits in the PIN is important, because presumably the 17 smaller the number of digits, if you keep trying, you'll 18 eventually get there. Does it mean because of your 19 automated lockout procedures that you don't regard 20 a large number of digits in the PIN as really necessary?</p> <p>21 MR HUGHES: I think if you compare it to perhaps the 22 financial industry and people's cash cards are 23 four-digit PINs, I don't know exactly how many thousands 24 of combinations there are, but I think from all of our 25 perspectives, certainly from Vodafone, one wrong key</p> <p style="text-align: center;">Page 16</p>

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<p>1 press of that PIN is going to send an alert to the 2 customer. 3 LORD JUSTICE LEVESON: Aren't there 9,999? 4 MR HUGHES: Is that how many there are? 5 LORD JUSTICE LEVESON: I would have thought so, but rather 6 fewer than that if you exclude 111 and 0000. 7 Q. Does anybody see an issue with the number of digits? 8 MR GORHAM: No, I think the number of digits, four, is the 9 same as you would have with a banking card and 10 everything. I think the challenge is getting customers 11 to use those numbers and pick PINs that are not easily 12 guessable. 13 MR BLENDIS: I think also to be fair customers want a 14 balance between usability and security, so if you tell 15 them they have to have a ten digit PIN number to get 16 into their voicemail, they'll find it quite difficult. 17 LORD JUSTICE LEVESON: Yes, I have a system that I have to 18 change the number every three months and the problem of 19 course then is remembering what it is at the relevant 20 time. So I see the problem. 21 MR BARR: Mr Blendis, you've already touched on future 22 developments at Orange and T-Mobile. Can I ask each of 23 you more generally about whether you think, accepting 24 what you've already said, there is anything further that 25 can be done and in particular whether there is anything</p> <p style="text-align: center;">Page 17</p>	<p>1 accessed remotely, a text will be sent back to the 2 customer, so if that is somebody that's trying to hack, 3 the customer will be alerted. We'll actually also give 4 customers the option to switch off remote access. If 5 they don't use it and don't want it, we'll enable them 6 to switch that off so they can't be hacked, essentially. 7 LORD JUSTICE LEVESON: Of course that works also if you have 8 the PIN number before you access the box. Because 9 I think one of your companies says until you've actually 10 put in your own unique number, you can't access the 11 voicemail. So if you never do put in a number, you 12 simply will never have access to a voicemail. 13 MR BLENDIS: That's true, but somebody can still guess the 14 number. So yes, you're right, unless you set it up. 15 But it's the people that set it up and then want to 16 disconnect it, they'll be able to do that. 17 MR BARR: Mr Hughes, can I ask you about the letter that 18 Vodafone sent to the Inquiry on 26 January. In that 19 letter, Vodafone very properly drew the Inquiry's 20 attention to an exception to the general changes which 21 you've been telling us took place around 2006. 22 I understand from that letter that there was a specific 23 system, which at its peak had 300,000 users, called 24 Vodafone Mail, which was not subject to the tightenings 25 of security which you have outlined to us and that was</p> <p style="text-align: center;">Page 19</p>
<p>1 actually in the pipeline. Mr Hughes? 2 MR HUGHES: Yes, so we're always looking at ways that we can 3 improve our security. It's very much my job to do that. 4 From a customer authentication perspective, we're 5 looking at some future technical enhancements, what you 6 could do, probably in the areas of things like voice 7 biometrics, which would be the digital reading of the 8 actual customer as they call in, which is something 9 we're looking into for sort of future deployments on the 10 Vodafone network. 11 MR GORHAM: Similar to ourselves, there's lots of things in 12 the future that may come along and be technology 13 solutions. What we just have to be careful of is they 14 still give customers the usability, that they actually 15 want to use our products and services. 16 Also at international level with the GSM 17 Association, I believe next Monday, Tuesday, they're 18 issuing a new standard on voicemail security, put 19 together by all the operators, so that will try and get 20 more of a basis for security across the industry. 21 MR BLENDIS: As I said, we have a new voicemail platform 22 that we're putting in place which should actually be 23 complete in the next few months and that will have 24 a number of enhanced features. The real problem is the 25 unauthorised access, so every time the voicemail box is</p> <p style="text-align: center;">Page 18</p>	<p>1 overlooked and was only relatively recently discovered 2 and put right. You tell us things were put right in 3 June 2010; is that right? 4 MR HUGHES: That's correct. 5 Q. On the Vodafone Mail system, a user could dial 242 from 6 their mobile handset to collect messages. Could they 7 dial 242 to collect messages remotely? 8 MR HUGHES: I'd have to check that. I'm not entirely sure. 9 Q. But they could certainly check remotely simply by using 10 a PIN number and using a default PIN number? 11 MR HUGHES: Yes. So the system itself accounted for about 12 1 per cent of our customer base. The platform was due 13 to be decommissioned actually around the time of the 14 activity coming to light. However, you could have -- 15 with the changes I outlined on the main platform, you 16 could still in theory have phoned through to a customer 17 service agent, you still have to authenticate, but then 18 you would be able to ask the customer service agent to 19 reset the PIN on that specific service. 20 The action we did take at the time was that we took 21 away the ability for the vast majority of our customer 22 service agents to be able to reset the PIN and we 23 limited that to a very small number of customer service 24 managers that we had in our call centre environment to 25 try and address that specific issue, but as you rightly</p> <p style="text-align: center;">Page 20</p>

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<p>1 said, it wasn't decommissioned fully until around about 2 2010, that's correct.</p> <p>3 Q. Does Vodafone know whether or not there were any losses 4 of confidential data from Vodafone Mail?</p> <p>5 MR HUGHES: What we have done in all of our contacts with 6 the Operation Weeting team at the Metropolitan Police is 7 check that any of what we now know to be the confirmed 8 victims were ever a member of the Vodafone Mail service, 9 and I'm happy to say that they weren't.</p> <p>10 Q. It's plain, if I may say so, gentlemen, that your 11 respective companies have taken significant action from 12 about the middle of the last decade, when this issue 13 received a lot of prominence and was the subject of high 14 profile criminal proceedings. But it's the position 15 that the Inquiry has heard evidence that these security 16 vulnerabilities were known about in general terms and 17 publicised long before that, not least through the 18 publicity generated in the media by Mr Nott, and his 19 story was picked up in a number of places.</p> <p>20 So I'd like to ask each of you in turn, and I'll 21 start with Mr Blendis, why the industry didn't react 22 more quickly than it has.</p> <p>23 MR BLENDIS: I have to be honest, I don't know what our 24 knowledge was of Mr Nott at that time. That was a long 25 time before the scandal erupted around the Mulcaire</p> <p style="text-align: center;">Page 21</p>	<p>1 by taking away some of the features that customers had, 2 so we took that decision away from customers when we 3 found out it was being abused. But prior to that, I had 4 no evidence that voicemail was being abused in any way.</p> <p>5 Q. I think I've already asked you about Mr Nott, so I won't 6 repeat that question. Can you help me more generally 7 with why Vodafone didn't act before it did?</p> <p>8 MR HUGHES: I think when you look back through the time line 9 now of the issues that were changed in 2001 around 10 default PIN settings across all the network providers, 11 when this other issue of blagging or social engineering 12 came to light, the networks, the industry made changes 13 again to increase security, and I think building on what 14 O2 have said, I think generally when you look at 15 criminality right the way across the communications 16 sector, whatever way it's happening, whether it be the 17 issue of blagging, whether it be the theft of mobile 18 phones, whether it be the theft of metals, we actually, 19 you may be surprised to learn, collaborate quite a lot 20 in the security arena. It's not necessarily 21 a competitive area for us, so we'll meet regularly to 22 make sure that all of us have the best security that we 23 can and we share ideas to protect our customers right 24 the way across the industry.</p> <p>25 LORD JUSTICE LEVESON: I'm delighted to hear that.</p> <p style="text-align: center;">Page 23</p>
<p>1 hacking. I think we have reacted quickly, and I think 2 we always have a continuous programme of improvement. 3 Security has always been a priority for us. It's 4 important for our customers so it's important for us, 5 not just in relation to voicemail hacking but across the 6 whole spectrum of services.</p> <p>7 We have a programme of enhancements on security 8 generally to make sure that information is contained, 9 that it's only kept with people that need to hold that 10 information and the access is limited, and also that if 11 there are suspicions that people within our business can 12 disclose data, that that is restricted as far as we can.</p> <p>13 So people within our business now can't download 14 information onto data sticks, they can't send large 15 files by email. These are very restrictive operations 16 within the business, but we have reacted and we have 17 done our best to enhance that because it's important for 18 our customers.</p> <p>19 Q. Mr Gorham, why wasn't more done earlier?</p> <p>20 MR GORHAM: I wasn't aware of the Mr Nott case prior to 21 2005/2006. We certainly were not aware of the weakness 22 that was being exploited within the voicemail platforms 23 prior to the investigation. That was completely news to 24 us and I believe to the industry, and it was at that 25 point that we then went up to the next level of security</p> <p style="text-align: center;">Page 22</p>	<p>1 MR BARR: I'm going to move now and deal more shortly with 2 the interception of conversations. It's well-known that 3 a long time ago an analogue conversation was intercepted 4 and hit the headlines in the newspapers. Is it right as 5 a general proposition that intercepting mobile phone 6 conversations is now a lot more difficult than it used 7 to be?</p> <p>8 MR HUGHES: I think it's very difficult. The encryption 9 that we all replace from the point at which the customer 10 makes a call from their handset and where it transmits 11 through the air to the technology infrastructure that it 12 needs to, it's all encrypted to a very specific standard 13 with all sorts of difficult algorithms applied to it.</p> <p>14 I think it's certainly reasonable to say it is 15 possible to do that. Doing it live, which is I think 16 what you're alluding to, is incredibly difficult 17 technically. You would have to have a lot of technical 18 skill to do it, and you'd have to have significant 19 financial resources behind you to buy the equipment in 20 order to do it. Of course, it's illegal and I think 21 carries a custodial sentence under RIPA.</p> <p>22 Q. Does anyone disagree with that answer? 23 (Witness shook their heads)</p> <p>24 As far as you're aware, is the interception of 25 conversations, whether live or ex post facto,</p> <p style="text-align: center;">Page 24</p>

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<p>1 a significant issue?  2 MR BLENDIS: No.  3 MR HUGHES: No.  4 MR GORHAM: No.  5 Q. Can we move to blagging and we've touched on this to  6 some extent in your answers already about what staff  7 have access to, particularly you've told us about PINs.  8 Can staff have access to location data, where calls are  9 made from? Mr Hughes, I'll start with you.  10 MR HUGHES: No, not readily. We give our customer service  11 agents the details they would need to help with any type  12 of customer query. I suppose this will be specifically  13 around -- usually around billing queries. We'd make  14 that sort of information available.  15 Location information is incredibly sensitive, so we  16 make sure there are only a very few specific areas that  17 have the need to have access to location details and the  18 sorts of areas I'm thinking about in my organisation  19 would be the areas in which we're obligated to share  20 communications data with the police and the authorities  21 to help with their investigations. It's very much  22 ring-fenced to make sure that that information is kept  23 as absolutely secure as possible.  24 Q. Has that always been the case or is that as a result of  25 a tightening up of security?</p> <p style="text-align: center;">Page 25</p>	<p>1 access. I suspect it would be about 50 but I don't have  2 first-hand knowledge of that.  3 Q. Mr Blendis?  4 MR BLENDIS: Again, customer service agents wouldn't have  5 access to specific location information, for example PIN  6 type information. That's very restricted. It's within  7 a specific police liaison team within our organisation  8 that sits in my team. There's about 20 people in each  9 of the Orange and T-Mobile organisations.  10 Q. How long has that restrictive approach to showing  11 location data been in place?  12 MR BLENDIS: That's always been the case.  13 Q. I'm getting the sense though that call data generally,  14 who a person has been calling, is available to your  15 customer services operators of necessity, so that they  16 can deal with legitimate enquiries. Is there anything  17 that can be done to prevent a blagger trying to obtain  18 data about who a person has been calling, for example  19 a blagger who wants to know if X has been calling  20 a suspected lover or something like that?  21 MR HUGHES: From the Vodafone perspective, we'd only ever  22 assist a customer with details about their own mobile  23 phone activity in the numbers that belong to them and  24 that's their outgoing calls. So we would never  25 considering answering any question for anyone other than</p> <p style="text-align: center;">Page 27</p>
<p>1 MR HUGHES: It's always been the case to the best of my  2 knowledge.  3 Q. Can you give us some idea about the number of employees  4 which Vodafone has who would have access to location  5 data, in rough terms?  6 MR HUGHES: The wider organisation I have to check. I'm  7 thinking about my own remit and responsibilities in the  8 area that I've outlined and that would include around  9 about 15 people.  10 Q. Mr Gorham, what's the position with O2 so far as  11 location data is concerned?  12 MR GORHAM: Our customer service staff have access to your  13 billing information, the calls that you've made, but  14 they certainly wouldn't have access to the location of  15 your phone, that's an access they don't have and never  16 would have had. There are people in the organisation,  17 the same as Vodafone, we have had the police disclosure  18 team and they need to have access for requests we get  19 from the police for location, life at risk cases.  20 There's also some of our engineering staff that have  21 access to that data if a customer is having problems on  22 the network making calls, they may want to identify what  23 cell site they're on, so those kinds of people.  24 I'd have to write to the committee to give you an  25 idea of the numbers of staff that would probably have</p> <p style="text-align: center;">Page 26</p>	<p>1 themselves.  2 I think in general terms around authentication of  3 the customer, the important thing is that when the  4 customer service agent has the call put through, that  5 we've done enough to make sure that we've -- beyond  6 reasonable doubt, if you like, we can be sure we're  7 talking to the right person, either the customer or  8 someone who is registered to the account, and that's  9 what we need to make sure is the case for our customer  10 service agents, who are there in place to help our  11 customers.  12 MR GORHAM: Same for us. When a customer contacts us, we  13 ask customers to have a password on their account which  14 they need to get correct before we have a discussion  15 with them. If they don't have the password or have  16 forgotten it, we will go through a number of security  17 questions to try and validate who they are, and we will  18 vary those questions. So they will change to try and  19 give us that confidence.  20 The challenge, as I'm sure you appreciate, is we  21 have about 35 million calls every year into customer  22 services, 23 million customers. The opportunities that  23 social engineering occurs is very, very rarely and it's  24 very difficult to defend somebody who may have already  25 stolen an individual's personal identity and is using</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 that to trick that confidence at that stage.</p> <p>2 MR BLENDIS: It's a similar position, customer services</p> <p>3 agents would only supply billing data to the genuine</p> <p>4 customer. We recognise that we need to do more to make</p> <p>5 customer service agents aware of blagging, so we have</p> <p>6 a training programme running out, we have videos that</p> <p>7 they watch that shows examples of how it's done. We're</p> <p>8 encouraging customer services to move away from the</p> <p>9 traditional what are probably easier questions so that</p> <p>10 they will ask more rigorous questions that they know</p> <p>11 only the customer would have access to that information.</p> <p>12 Q. I picked up from the Vodafone information that there's</p> <p>13 now a duty to report suspected data breaches at</p> <p>14 Vodafone. Is that the same in O2?</p> <p>15 MR GORHAM: Absolutely, yes.</p> <p>16 Q. I see you nodding, is that the same --</p> <p>17 MR BLENDIS: (Nods head).</p> <p>18 Q. -- for Everything Everywhere? Do you all have</p> <p>19 whistle-blowing policies to protect whistle-blowers who</p> <p>20 come forward?</p> <p>21 MR BLENDIS: Yes.</p> <p>22 MR HUGHES: Yes.</p> <p>23 MR GORHAM: Yes.</p> <p>24 Q. Can I ask you what your experience has been in terms of</p> <p>25 attempts to socially engineer information from your</p> <p style="text-align: center;">Page 29</p>	<p>1 investigated by our own investigators and are taken</p> <p>2 through to the criminal courts if it's believed to be</p> <p>3 appropriate and the evidence is there to substantiate.</p> <p>4 Q. Mr Blendis?</p> <p>5 MR BLENDIS: So the number of people that have been</p> <p>6 dismissed and prosecuted across both brands is four</p> <p>7 people in the last I think it is five years. We don't</p> <p>8 have records of other disciplinaries. We only know</p> <p>9 about those ones where we have initiated an</p> <p>10 investigation, contacted the police and those have</p> <p>11 actually led to the prosecution of those individuals.</p> <p>12 Q. Only the most serious of cases?</p> <p>13 MR BLENDIS: There will be other cases and those will be</p> <p>14 dealt with through our disciplinary procedures, but we</p> <p>15 don't have records of exactly how many cases.</p> <p>16 Q. We have in the bundle at tab 11 the response to</p> <p>17 a request for information from the Information</p> <p>18 Commissioner's office about data protection breaches by</p> <p>19 telecommunications companies. There is on the third</p> <p>20 page of that document a list of companies and the number</p> <p>21 of data protection breaches.</p> <p>22 All of your companies feature on that list. At the</p> <p>23 top is BT with 42, then Talk Talk with 12, Virgin Media</p> <p>24 with 20, O2 with 10, Orange with one, Three with two,</p> <p>25 Vodafone with 18, T-Mobile with six and Sky with 10, and</p> <p style="text-align: center;">Page 31</p>
<p>1 organisations? Mr Hughes, can you give us an idea of</p> <p>2 how many of your staff have had to be the subject of</p> <p>3 disciplinary proceedings for that sort of issue?</p> <p>4 MR HUGHES: Certainly. From the records that I've looked at</p> <p>5 in preparation for helping the Inquiry today, we go back</p> <p>6 to 2009, which is as far as back as I can see from an</p> <p>7 investigations perspective. Whether it be the</p> <p>8 accidental disclosure of personal data -- and I'd like</p> <p>9 to add none of this information is in relation to</p> <p>10 voicemail hacking but the wider issue of customer</p> <p>11 personal data -- so whether it be the accidental leakage</p> <p>12 of customer personal data or whether it be a malicious</p> <p>13 attempt to remove personal data from the company,</p> <p>14 I believe we've had 13 investigations which have</p> <p>15 resulted in either some kind of disciplinary warning or</p> <p>16 a dismissal from the organisation.</p> <p>17 Q. Mr Gorham, can you --</p> <p>18 MR GORHAM: My evidence is the same as we supplied back to</p> <p>19 the committee. So since 2003 we've had 54 staff who</p> <p>20 have either been disciplined, prosecuted or dismissed</p> <p>21 for cases relating to breaches of data security. That</p> <p>22 is not purely voicemail. That could be disclosing some</p> <p>23 billing information, looking at somebody's account that</p> <p>24 they weren't supposed to look at, but that's the total</p> <p>25 scale would be 54, and a number of those were</p> <p style="text-align: center;">Page 30</p>	<p>1 that's for the period between 1 April 2008 and 31 July</p> <p>2 2011.</p> <p>3 On the face of it, those are concerning statistics.</p> <p>4 I'd like to ask you whether more can be done to protect</p> <p>5 personal data by your companies. Mr Hughes, I'll start</p> <p>6 with you, please.</p> <p>7 MR HUGHES: Of course. Both privacy and security are put</p> <p>8 into everything that we do. In every product and</p> <p>9 service we bring to market, it's designed in from</p> <p>10 scratch. It's incredibly important. We recognise how</p> <p>11 important it is to our customers and our employees and</p> <p>12 that's why it's important to us. Yes, we have an</p> <p>13 obligation to supply details of the breaches to the</p> <p>14 Information Commissioner's office and the legislation</p> <p>15 may lay out certain penalties on all of our</p> <p>16 organisations in relation to data breaches, but</p> <p>17 certainly in terms of Vodafone, my security department</p> <p>18 is responsible for making sure that this doesn't happen</p> <p>19 and, when it does happen, any employee in the</p> <p>20 organisation, whether it be accidentally or done as</p> <p>21 a result of an inaction on that employee's behalf which</p> <p>22 has led to that breach or whether it be malicious, any</p> <p>23 of our employees should expect a very robust approach to</p> <p>24 that.</p> <p>25 Q. Mr Gorham?</p> <p style="text-align: center;">Page 32</p>



<p>1 MR GORHAM: The ten cases here that refer to our                  2 organisation, they are investigated by our regulatory                  3 team and they are farmed out to my investigators if                  4 appropriate, or customer services if it involves them.                  5 We send reports back to the ICO and make recommendations                  6 on what we're going to do for improvement and we've had                  7 no further action taken against us on those cases.                  8 We strive continually to continue to protect our                  9 customers' data at that highest level, but a lot of                  10 these do tend to be fairly minor cases in the effect                  11 that they could be domestic situations, so you can get                  12 examples of where it's an employee and it's a relative,                  13 and it's very difficult to guard sometimes against those                  14 domestic situations that drive some of them, rather than                  15 these being major data breaches of large amounts of                  16 customer data.                  17 Q. Mr Blendis?                  18 MR BLENDIS: For security, data security is a top priority                  19 for our business. It's a priority for the board, it's a                  20 priority for everyone who's working for products and                  21 services. We have a kind of three-point approach to                  22 data security. The first thing is just to cleanse                  23 information in business as far as we can to make sure we                  24 only hold data that's relevant and key to our services,                  25 so we narrow down the amount of information that we</p> <p style="text-align: center;">Page 33</p>	<p>1 MR HUGHES: Yes, so from the point at which we helped the                  2 police with their inquiry, we ran some checks. Would                  3 you like me to tell you the checks that we ran?                  4 Q. Very briefly.                  5 MR HUGHES: We were provided with two suspect landline                  6 numbers, which we now understand belong to                  7 News International, and we checked to see which unique                  8 voicemail numbers of our entire customer base had been                  9 contacted by these landline numbers. That produced us                  10 a report to say that there were 177 unique voicemail                  11 numbers that had been dialled. However, that doesn't                  12 suggest that there's 177 victims. What we needed the                  13 police to do was put their evidence and their pieces of                  14 the jigsaw together to come back with and confirm                  15 exactly who the victims were on the Vodafone network,                  16 and we understand that that investigation has now taken                  17 place and from our liaison with the police, we                  18 understand on the Vodafone network there are 40 victims.                  19 Q. What's the position at O2?                  20 MR GORHAM: Back when the police investigation kicked off,                  21 yes, they came to us with a specific phone number where                  22 calls had been made into voicemail retrieval numbers.                  23 We did our own identification, we identified in the                  24 region of 40 customers that we believed may have had                  25 their accounts compromised. We passed that information</p> <p style="text-align: center;">Page 35</p>
<p>1 hold.                  2 The second thing is to make sure that access is only                  3 restricted to those that really need to see it, so we                  4 don't have large swathes of data sitting across the                  5 business for general access.                  6 The third thing is to ensure that that access can                  7 only be attained in limited circumstances, so it can't                  8 be sent by email, can't be downloaded onto data sticks,                  9 and that we hope will really narrow down the opportunity                  10 for people to breach those data security procedures.                  11 But as we've heard from the others, low level                  12 breaches will occur, and I think some of these                  13 notifications are partly, for example, where we've had                  14 a request for information from a customer, we have an                  15 obligation to provide that information, but we have                  16 failed to do so within the timeline. So we take it very                  17 seriously, but the volume of these is fairly low.                  18 They're not all major security breaches.                  19 Q. Can I move now to the cases of hacking which have                  20 emerged and which are being investigated by the police.                  21 In answering my next questions, please don't give any                  22 names, but what I would like to know is first of all                  23 whether you know how many or whether you have a current                  24 figure for how many of your customers have been the                  25 victims of voicemail interception. Mr Hughes?</p> <p style="text-align: center;">Page 34</p>	<p>1 back to the police and took the step of contacting those                  2 customers. So we contacted all our customers, informed                  3 them of what we could see on our network and we advised                  4 them at that stage about how they could enhance their                  5 voicemail security to stop any further attempts to                  6 listen to their messages.                  7 Q. Do you have a number?                  8 MR GORHAM: Ours was 40, slightly under.                  9 MR BLENDIS: We had 45 customers that we identified on the                  10 Orange network. That's where the call-in number had                  11 accessed those 45 numbers and accessed the voicemail                  12 box, that was 45 on Orange, and on T-Mobile it was 71.                  13 Q. Can I move on to the question of communicating the facts                  14 of a breach of data security to the customer. Can we                  15 start with what the position is now. Has Vodafone                  16 informed any of its customers that their voicemails have                  17 been hacked?                  18 MR HUGHES: Yes. In January 2012 we worked with the police                  19 and they told us that they were in a position to contact                  20 the customers on the Vodafone network and they wished to                  21 do so, so my understanding is that the police contacted                  22 the customers in January 2012 and we also did exactly                  23 the same thing.                  24 Q. All of them?                  25 MR HUGHES: All of them.</p> <p style="text-align: center;">Page 36</p>

<p>1 MR GORHAM: We contacted all of our customers back at the 2 time of the original Inquiry, so that was five years 3 earlier when the original police investigation took 4 place. 5 Q. Mr Blendis? 6 MR BLENDIS: We contacted all of those customers in July 7 2011, so that was after we had received the information 8 from the police that verified which were the victims of 9 phone hacking. Up to that point, we didn't have that 10 verification from the police. 11 Q. Why wasn't it done earlier by Vodafone? 12 MR HUGHES: We were expressly told at the time of the 13 investigation not to contact our customers as we may 14 prejudice the police investigation. We're very 15 experienced in working with the police, we help them 16 make thousands of investigations a year, so the last 17 thing we would want to do would be to trample on an 18 investigation that the police were running. So that's 19 why it wasn't done. 20 Q. Was there any correspondence between your company and 21 the police expressly dealing with this issue? 22 MR HUGHES: Yes. The correspondence that I have is that we 23 received quite confusingly a letter in the October of 24 2010 from the Metropolitan Police requesting that we 25 contact the Vodafone customers that were victims, and we</p> <p style="text-align: center;">Page 37</p>	<p>1 that perhaps Vodafone should have been more proactive 2 about liaising with the police to ensure that your 3 customers could have been told at the earliest sensible 4 opportunity? 5 MR HUGHES: What we did manage to agree with the police 6 around the time the investigation was, they accepted 7 that we could send out some generic voicemail security 8 advice to customers within our organisation which would 9 be perhaps more at risk, so people in the media, members 10 of government, et cetera, so we were able to push out 11 some communications, some general awareness 12 communication to them at the time. 13 Also, throughout the whole of the period of the 14 investigation from 2006 right the way through until now, 15 clearly it started to get into the media, so we did 16 field a lot of calls from really concerned customers 17 saying, "I'm worried about what's happened, have I been 18 a victim?" 19 As I've said previously, we would never be able to, 20 with any level of clarity, without seeing that police 21 evidence, confirm that they were a victim, but what we 22 were able to do was see whether their information had 23 been supplied to the police as part of the evidence 24 bundle, and if it had, we informed them of that and 25 asked them to then contact the police for more details.</p> <p style="text-align: center;">Page 39</p>
<p>1 had to point out -- we wrote back to them and pointed 2 out that although we'd supplied the 177 unique voicemail 3 numbers, we still had no clarity at all about who the 4 actual victims were on the Vodafone network until the 5 police put their pieces of the jigsaw together and told 6 us that, so we never received a response to that 7 communication, and the next communication that we had 8 was when in late 2011 the police told us they were now 9 in a position to be able to identify the victims on the 10 Vodafone network, and as soon as they did that, we 11 followed suit with contacting our customers immediately. 12 Q. Was the lack of a response from the police back in 2010, 13 October 2010, was that chased in the interim between 14 October 2010 and the answer later in 2011? 15 MR HUGHES: I have no specific records I can draw upon to 16 say that it was chased or how frequently it was. I know 17 that throughout the whole period of the investigation 18 when we were helping from 2006 to date, we fully 19 co-operated with anything that we were asked to do in 20 relation to the investigation, but whether it was 21 specifically chased, I have nothing I can draw upon to 22 be able to look at the -- 23 Q. I don't wish to suggest that in any way you haven't 24 co-operated with the police, but can I ask you this. 25 From your customers' point of view, would you accept</p> <p style="text-align: center;">Page 38</p>	<p>1 To answer your question sort of directly, I think 2 with the benefit of hindsight it would be have been much 3 better to have a level of clarity with the police much 4 earlier so that we could tell our customers what the 5 issue was. 6 Q. Mr Blendis, we've heard that O2 notified their customers 7 at an earlier stage than your companies. 8 MR BLENDIS: Yes. 9 Q. Why didn't your companies do the same? 10 MR BLENDIS: We were in a similar position, where we did not 11 know that those customers were the victims of phone 12 hacking, so we have a large number of callers that the 13 hacker potentially called, and actually all we knew was 14 that the call diverted to voicemail, so we don't even 15 know at that stage whether they have then accessed the 16 voicemail box, which would lead to potentially 17 a presumption of hacking. 18 So we did actually write to the police in November 19 2010 and we said, "We've given you all of the 20 information that we have. If you can identify those 21 customers that you believe were the victims of hacking, 22 please tell us and we will contact those customers." We 23 did that in November 2010. 24 Q. And what response did you get? 25 MR BLENDIS: We've had no response to that.</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 Q. Did you chase?  2 MR BLENDIS: We didn't chase. I think in hindsight and  3 I think now we would probably be much more proactive  4 because I think we recognise and sympathise with  5 customers that were hacked and we would really want them  6 to know about that. So what we need to get to is  7 circumstances where we have clarity where we're not  8 prejudicing the investigation, where we're not, for  9 example, tipping off the hackers themselves. So some of  10 the numbers actually are the journalists at the  11 News of the World, so what's likely is that there was  12 some trial and error of the process, and I think it's  13 highly likely that if we had simply contacted everyone  14 that we had as a potential victim, we may well have  15 tipped off those people.  16 MR BARR: Thank you. Those were all my questions.  17 LORD JUSTICE LEVESON: I have no questions. Obviously  18 you've been following the events as they've unfolded,  19 and I have no doubt that each of your companies will do  20 all that it can to minimise the risk of data loss and  21 the consequent damage to the security of your customers.  22 I have no doubt that you will. Thank you all very much  23 for coming and for the response that you've given to my  24 requests. Thank you.  25 MR BARR: Sir, the next witness is going to be Mr Imossi.</p> <p style="text-align: center;">Page 41</p>	<p>1 Q. Prior to your involvement in the Association of British  2 Investigators, you were the founder and former chairman  3 of the UK industry-wide Investigator Sector Group; is  4 that right?  5 A. No, I was the president first, I became president in the  6 year 2000, and in the eve of the passing of the Private  7 Security Industry Act, myself and the then principal of  8 the IPI got together and formed the Investigator Sector  9 Group so that we could form a united front and speak  10 with one voice on the question of licensing.  11 Q. In 2004, you were appointed secretary general to the  12 European-based umbrella body Internationale Kommission  13 der Detektivverbände, which is currently working on EU  14 common minimum standards on good practice  15 recommendations for investigations?  16 A. Yes.  17 Q. And you have been the president of the ABI twice, the  18 first time between 2000 and 2004, and currently since  19 April 2008?  20 A. Correct.  21 Q. You go on to tell us something about the ABI. You tell  22 us it was incorporated on 31 December 1970 and that its  23 antecedents are that it began life as long ago as 1913  24 under the title British Detectives Association, and that  25 there was another association, the Association of</p> <p style="text-align: center;">Page 43</p>
<p>1 MR ANTHONY IMOSSI (affirmed)  2 Questions by MR BARR  3 MR BARR: Mr Imossi, good morning.  4 A. Good morning.  5 Q. Could you give the Inquiry your full name, please?  6 A. Anthony Imossi.  7 Q. Are the contents of your witness statements true and  8 correct to the best of your knowledge and belief?  9 A. They are indeed.  10 Q. You tell us that you are the President of the  11 Association of British Investigators Limited.  12 A. Yes, I am.  13 Q. And that your primary occupation is as a professional  14 investigator in the private sector trading as solicitors  15 law services?  16 A. Yes.  17 Q. And you've been doing that since 1981.  18 A. Yes.  19 Q. Your personal specialism is corporate and Internet  20 fraud, theft, due diligence and litigation support?  21 A. Yes.  22 Q. And before becoming a private investigator, you worked  23 for 15 years in the legal profession as a litigation  24 managing clerk?  25 A. Yes.</p> <p style="text-align: center;">Page 42</p>	<p>1 British Detectives, with which it merged and became the  2 Association of British Detectives before its  3 transformation into the ABI in 1970?  4 A. Correct.  5 Q. You tell us that despite the efforts of the ABI and its  6 predecessor organisations over the years to improve  7 professionalism and self-regulation in the industry, you  8 think that there still remains more to be done?  9 A. Very much so.  10 Q. Perhaps we can pause there to just ask you what the  11 membership of the ABI is at the moment?  12 A. It's circa 500. We sort of hover below and above that  13 number, depending on which time of the year. Out of  14 500, some 450 are UK-based and we have some overseas  15 members.  16 Q. I understand it's not possible to find a definitive  17 statistic for the number of people working in the  18 private investigation industry in this country, but what  19 are the reliable estimates believed to be?  20 A. Well, when the Home Office first started working on the  21 project to regulate the industry around about the time  22 the act was passed and before the SIA was formed,  23 a figure was plucked out of thin air at 10,000, simply  24 so it could work out its plan, its financial planning.  25 Now I became aware in 2008 that the Home Office had</p> <p style="text-align: center;">Page 44</p>

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<p>1 substantially reduced that estimate to 5,000 and they 2 were trying to put some meat on the bone with 3 identifying who that could be and they were struggling 4 to do so. I was aware of that because I was drawn into 5 the research by the government department that had been 6 commissioned by the Home Office.</p> <p>7 It's about that time that it became apparent to me 8 that there was a higher risk that licensing, which had 9 been dangled in front of us for the previous eight, nine 10 years --</p> <p>11 Q. If I could stop you there, because I'm going to come 12 back to licensing. I'm just interested in numbers. The 13 government estimates were around the 5,000 mark. Do you 14 know how many private investigators are registered as 15 data controllers?</p> <p>16 A. Yes. After the presentation that you had here in 17 September, I was present and I listened to the Assistant 18 Information Commissioner and I was particularly drawn to 19 his evidence that there were 350,000 in total data 20 controllers on the ICO's register. It then occurred to 21 me that perhaps this could be the nearest or the most 22 reliable source for us to try and estimate how many 23 private investigators, or at least responsible private 24 investigators that there are, because one of the 25 purposes that features on the register is actually</p> <p style="text-align: center;">Page 45</p>	<p>1 a Royal Charter in order to become the Chartered 2 Institute of Investigators?</p> <p>3 A. Yes, that's not entirely clear there. That would be 4 a collective ambition. I would hope to pull together 5 support from other professional organisations within the 6 industry. We have already approached the IPI, the 7 ex-police officers in commerce, the Association of 8 Certified Fraud Examiners, to name but three 9 organisations that we've asked to meet with us to 10 discuss our proposals to make a move towards petitioning 11 for the --</p> <p>12 LORD JUSTICE LEVESON: How many associations are there?</p> <p>13 A. Essentially there are three that are predominantly 14 dedicated towards professional investigation. There are 15 several other specialised organisations. I can't 16 remember off the top of my head exactly how many there 17 are, but, for example, I recently met with the insurance 18 fraud investigation group, another group, but they 19 predominantly represent in-house investigators in the 20 insurance market.</p> <p>21 But it very much depends on how, or if and when 22 regulation is implemented, how it is viewed, and what 23 parts of the sector are to be drawn in. For example, 24 in-house --</p> <p>25 MR BARR: If I just stop you are there on the question of</p> <p style="text-align: center;">Page 47</p>
<p>1 called private investigation and after that presentation 2 I put the question formally to the Information 3 Commissioner's office and I got the answer back the 4 figure was just a handful below 2,000.</p> <p>5 Q. So on any view, the number of private investigators who 6 are members of the ABI, expressed as a percentage of the 7 overall total of the industry, is really quite small?</p> <p>8 A. Well, in round figures if the total data controllers 9 with that purpose is 2,000, then the 500 or 450 10 membership is a sizeable proportion, I would submit.</p> <p>11 Q. But on any view a minority?</p> <p>12 A. Certainly.</p> <p>13 Q. You tell us in your witness statement about the 14 structure of the organisation. It has a governing 15 council with president, vice president and treasurer. 16 Functions including discipline, marketing, compliance, 17 enforcement and membership selection, to which we'll 18 come in a moment, and you have a full-time salaried 19 general secretary.</p> <p>20 A. Indeed.</p> <p>21 Q. There are five regional branches. You're a non-profit 22 organisation and funded essentially by annual 23 subscription from members.</p> <p>24 A. Yes.</p> <p>25 Q. Your strategic objective, you say, is to work towards</p> <p style="text-align: center;">Page 46</p>	<p>1 the number of organisations, you mentioned three at the 2 start of your answer. Are those the IPI, the ABI and 3 WAPI?</p> <p>4 A. There's three predominantly that specialise on the 5 investigations side, yes.</p> <p>6 Q. At paragraph 12 of your witness statement, you tell us 7 that there has never been a requirement in the British 8 Isles for the registration or licensing of investigators 9 in the private sector. And the guesses as to the 10 numbers of people practising in the private sector are 11 3,000 to 20,000, and you told us a little bit more about 12 that a moment ago.</p> <p>13 The immediate thought that springs to mind from that 14 evidence, Mr Imossi, is that this Inquiry has heard from 15 a private investigator, Mr Derek Webb, who told the 16 Inquiry that he was licensed. Can you help us?</p> <p>17 A. I can indeed.</p> <p>18 Q. Can that be right?</p> <p>19 A. No, it's not. And I took it upon myself to track him 20 down and speak with him and I did quite recently. It 21 turns out that what he actually meant that he had 22 membership of the IPI. It wasn't a licence at all.</p> <p>23 Q. I think we can take it from your witness statement that 24 you are a strong supporter of licensing?</p> <p>25 A. Yes. Or, well, regulation.</p> <p style="text-align: center;">Page 48</p>

<p>1 Q. In the absence of formal regulation of the industry, can                  2 I ask you a little bit more about what your Association                  3 does by way of self-regulation of its members? You tell                  4 us that there is a Code of Ethics and Professional                  5 Standards, it's exhibited to your witness statement.                  6 It's right, isn't it, that at the heart of that                  7 document, amongst other things, is a requirement always                  8 to act with honesty?                  9 A. Yes.                  10 Q. And also always to act within the law?                  11 A. Yes.                  12 Q. Is there any specific guidance provided by the ABI about                  13 phone hacking, including voicemail interception?                  14 A. Well, we haven't identified those particular problems                  15 per se, but they would be incorporated in the                  16 legislation and laws that exist that would affect the                  17 activities of investigations.                  18 If I could just sort of build up to the publication                  19 I'm going to refer to in a moment and how it came about,                  20 the turning point for the industry, really step number                  21 one to our ambitions to become a profession, was on                  22 1 March 2000 when the Data Protection Act 1998 came into                  23 force, and that very month I had organised and chaired                  24 a conference, a seminar, for any investigators dedicated                  25 to data protections and how things had to change, and in                  Page 49</p>	<p>1 were absolutely certain that what we were talking about                  2 here was correct and the correct practice.                  3 Q. So short answer: Data protection, yes; specific                  4 guidance on phone hacking, no?                  5 A. No, we haven't addressed those particular points, but                  6 I'm sure they will be matters that we will bring into                  7 the next edition.                  8 Q. Thank you. Can I now move to paragraph 15 of your                  9 witness statement, where you set out the checks which                  10 the ABI performs before it admits a member, and you tell                  11 us first of all that there is a credit check. Why do                  12 you think it's so important to have a credit check?                  13 A. Well, being a professional investigator, it is our view                  14 that we hold not just a position of trust and                  15 confidentiality handling clients' sensitivity, but we                  16 also hold a position of responsibility to the inside                  17 knowledge that we gain through our activities to various                  18 systems, particularly in the credit industry, and                  19 I would suggest that an investigator would probably have                  20 learnt how he could escape his responsibilities on debt                  21 matters. Therefore, it was -- has always to my                  22 knowledge been a term, a condition of membership that                  23 the members are clean of any monetary judgments.                  24 Q. Might it also be that a person who was under financial                  25 duress might be tempted to do things which he or she --                  Page 51</p>
<p>1 fact how the law had changed.                  2 One of the speakers at that seminar was one of the                  3 deputy commissioners, Philip Jones, who suggested                  4 something during the question and answer session which                  5 buried very deeply in the back of my mind, and he said                  6 really that we needed to put together a best practice                  7 guide to give some sort of guidance to those practising                  8 investigations as to what they could and could not do.                  9 It wasn't until two years later that I actually                  10 found the right person who could put such a guide                  11 together, and indeed that was Richard Newman, who has                  12 some legal qualification, and who later became my                  13 successor in 2000 as President, and he did put together                  14 a best practice guide which predominantly is all about                  15 the Data Protection Act but also other statutes and case                  16 precedents that affect our activities.                  17 This is the only publication that exists in our                  18 sector, and we subsequently made it the basis of an                  19 entry exam for people to become members of our                  20 Association. The idea being that at the very least to                  21 a reasonable competent level the applicant will be                  22 familiar with the general contents of that guide. And                  23 that was an idea that came and we had it checked and                  24 read over by Rosemary Jay, who was the former solicitor                  25 of the office of the Information Commissioner, so we                  Page 50</p>	<p>1 A. That would follow.                  2 Q. -- might not otherwise do?                  3 A. That would certainly be the case.                  4 Q. You then tell us that there is a criminal conviction                  5 certificate (basic disclosure) requirement. Can you                  6 just help us, explain what the basic disclosure level                  7 requires?                  8 A. Yes. We've always had a self-declaration requirement                  9 that a member is clear of any criminal convictions,                  10 subject to the Rehabilitation of Offenders Act                  11 provisions. In 2009 we had a very unfortunate                  12 experience where someone who had been granted                  13 provisional membership was brought to our attention by                  14 the police that he was actually a convicted sex                  15 offender, and his activities as an investigator were                  16 really inconsistent with the job that they were trying                  17 to do in keeping an eye on him, from the Sexual                  18 Offenders Register. Of course we immediately looked                  19 into this and he had lied on his application form, he                  20 hadn't declared his conviction, and of course we                  21 immediately expelled him, and it then became apparent                  22 that the self-certification system was insufficient.                  23 However, having said that, we are not -- until we                  24 become regulated, we are not an exempt occupation, so we                  25 are not entitled to obtain a disclosure certificate from                  Page 52</p>

<p>1 the Criminal Records Bureau in England and Wales, 2 because they only provide standard and enhanced 3 disclosures which are for exempt occupations or people 4 working with children or vulnerable adults. 5 But there is, and I hadn't previously appreciated 6 this, a third type of disclosure, which is called basic 7 disclosure, which will only show unspent convictions, 8 and that is available to anybody through Disclosure 9 Scotland, and I undertook some research and learnt that 10 in fact this, although the Disclosure Scotland was 11 primarily for Scotland, it actually covered police 12 national computer information for the whole of the 13 United Kingdom, so we then decided that we would 14 implement that as a compulsory requirement for all our 15 members. 16 LORD JUSTICE LEVESON: Just pause a moment, please. 17 (Pause). 18 A. My previous efforts to succumb the problem of not being 19 an exempt occupation hadn't succeeded particularly well. 20 That was when the CRB was first formed, the Association 21 successfully applied to become an umbrella body of the 22 CRB and my idea was I would encourage the members to 23 become countersignatories as part of the process and the 24 procedure to become a countersignatory required the CRB 25 to carry out a full check on the individual, and of</p> <p style="text-align: center;">Page 53</p>	<p>1 A. Yes. 2 Q. Proof of identity is required and there is an 3 examination which is based on the best practice guide? 4 A. Yes. 5 Q. Which you've mentioned a moment ago. In addition to 6 that, you have a mandatory insurance requirement, with 7 a limit of at least £250,000. 8 A. Yes. 9 Q. Can I just explore that issue very briefly, by observing 10 that there is a private investigator going through legal 11 proceedings at the moment with payments of damages 12 which, when taken together, will far exceed £250,000, 13 not a member of your organisation, I should hasten to 14 add. But is it enough? 15 A. Probably not, but it's a minimum requirement. We had to 16 set a minimum requirement. Now, I know you mentioned 17 that there's an ongoing case, but our actual track 18 record is quite good, and we have been able to manage to 19 bring premiums substantially down. Certainly by making 20 it a compulsory requirement to have the cover, we were 21 able again to negotiate quite well with the 22 underwriters. 23 Now, the norm level of cover in my experience is 24 about £1 million. Many agencies take 2 or above, in 25 millions of pounds. But we had to set a bare minimum.</p> <p style="text-align: center;">Page 55</p>
<p>1 course if the CRB granted them that countersignatory 2 category, that gave us the green light that there was 3 genuinely a clear criminality history. 4 However, we could only do it on a volunteer basis, 5 and whilst we raised 50-odd members, persuaded them to 6 go through that process, it wasn't sufficient, and in 7 the event we weren't actually producing sufficient 8 searches, searches for CRB fee-generating work, and the 9 CRB required us and many other umbrella bodies to cease 10 that status. 11 MR BARR: Does it come to this, that you do what you can to 12 find out about an applicant's criminal history, but that 13 you would, if the law allowed it, dearly like to do more 14 and have a full enhanced check? 15 A. Well, at least a standard CRB check, yes. Enhanced 16 might be going a little bit too far, but certainly 17 a standard check, which is what in fact would happen if 18 we became regulated by statute. The industry would 19 become an exempt occupation. 20 Q. The next check that you mention in your witness 21 statement is to ensure that the applicant or the 22 applicant's business is notified as a data controller. 23 A. Yes. 24 Q. You take two professional referees, which you pursue, 25 and you say that there is an interview.</p> <p style="text-align: center;">Page 54</p>	<p>1 Bearing in mind that some of our members' activities are 2 quite minimal and they don't have a huge exposure to 3 large or potential large claims. 4 Q. I think you tell us later in your statement that when 5 this requirement was introduced, that there was a drop 6 in the number of people who renewed their membership; is 7 that right? 8 A. Yes. We did, but we've found that we've very quickly 9 made it up. The simple truth was that even taking into 10 account the level of membership fee, the amount of 11 premium that had dropped because of our negotiations 12 added together equated to less than what someone who was 13 not a member would be able to get that cover. But it 14 was a tough change of culture, because the norm is for 15 investigators not to have professional indemnity, and it 16 was the Association's view that as part of our cultural 17 move to professionalise the industry and really make 18 them more responsible and accountable, that this 19 requirement would give confidence to the outside world 20 that we were the good guys. 21 Q. Your final check is that the applicant's details are 22 circulated amongst the membership so that if anyone 23 knows any reason why the person should be considered 24 unsuitable, he or she can come forward and say so? 25 A. Yes, it's a belt and braces system.</p> <p style="text-align: center;">Page 56</p>

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<p>1 Q. You then go on to describe enforcement, compliance and 2 disciplinary procedures. You tell us that there's 3 a rolling audit, random checks, disciplinary process, 4 which is backed by investigation of complaints. 5 You mentioned one case a moment ago where there was 6 a disciplinary issue leading to the expulsion of the 7 member. Can you help us with what sort of level of 8 disciplinary offences you have to deal with? 9 A. Well, we don't have that many, I hasten to add, but they 10 do vary. The most common is complaints from members of 11 the public, which we take very, very seriously indeed, 12 and we do investigate to the hilt, and we will apply 13 such penalties that we're able to within our by-laws 14 from expulsion down to perhaps just a reprimand. 15 But we're very, very sensitive to how members of the 16 public, the consumers of investigators, how they're 17 treated and how they perceive members of the 18 Association. 19 Q. Look at tab 5 of the bundle and the document that you've 20 exhibited to your witness statement which is entitled 21 "The Association of British Investigators. 22 Self-regulation of investigators in the private sector, 23 a discussion document." 24 This document sets out, doesn't it, the ABI's 25 position on the state of the industry vis-a-vis Page 57</p>	<p>1 Q. I don't want to go into that particular example any 2 further, thank you. I'm asking generally, is it 3 a problem that you think is widespread in the industry? 4 A. Well, yes, it is. 5 Q. And then you go on to describe how changes in 6 information communication technology, which have 7 happened very rapidly in recent years, have generated 8 very significant privacy issues, and are these the very 9 issues that this Inquiry has been constituted to look 10 into? 11 A. Yes. 12 Q. Hacking, blagging? 13 A. Yes. 14 Q. And so on and so forth? 15 A. Yes. 16 Q. Can I ask you again, perhaps anecdotally from what you 17 pick up from your members and from the wider 18 investigations community, is this a problem which you 19 think has happened in the past and has now been put to 20 bed or is it an ongoing issue? 21 A. I think it's an ongoing issue. The mere fact that we 22 get asked to organise counter measures for suspected 23 bugging problems would indicate that certainly something 24 is going on. 25 The phone hacking situation, I certainly wasn't Page 59</p>
<p>1 regulation and the future? 2 A. Yes. It's a work in progress. It isn't the ideal 3 finished product, but in the time that we had, we felt 4 it important to put something across to this Inquiry so 5 you can see where we were coming from and what our views 6 are about the industry and what we would like to see 7 done about it. 8 Q. Working from the executive summary, one of the points 9 you raise is that some investigators have questionable 10 antecedents because it's possible for anyone to hold 11 themselves out as a private investigator in this 12 country. To your knowledge, is this a really sizeable 13 problem or not? 14 A. Well, it is. The "What price privacy now?" publication 15 from the Information Commissioner certainly was a shock 16 and awe document to expose the extent of the problem, 17 but it's much deeper than that. We have examples where 18 two people, brothers, who have a very long history of 19 antecedents that cut to the very core reason why this 20 Inquiry is -- 21 Q. I certainly don't want you to name anybody, please. 22 A. No. And they made enquiry as to the possibility of 23 joining the Association of British Investigators. They 24 were sent away with a flea in their ear and very 25 promptly formed their own organisation. Page 58</p>	<p>1 aware that that was being used by anybody. I can't for 2 the life of me even today think why an investigator 3 undertaking investigative activities would take such 4 a risk, or what benefit he would gain to his 5 investigation by intercepting a voicemail. I can 6 understand the value of it to the media, because of 7 course they are looking at innocent people who will 8 innocently leave messages, perhaps even of a sensitive 9 nature, on a voicemail, but the sort of people that 10 I investigate are not likely to leave anything that 11 would be of remote interest to my investigation on 12 a voicemail. 13 LORD JUSTICE LEVESON: That may be because you're 14 investigating people who may or may not be doing things 15 which they will want to keep covered up. The sort of 16 investigations that I've been looking at are of people 17 who are simply living their lives. 18 A. Correct. Correct, sir. 19 I would go on to say, you know, we're very sensitive 20 to teach our members about the methodologies that they 21 adopt and we're sensitive to not encouraging intrusive 22 methods. We played a significant role in the 23 preparation of a document, for example, that was 24 published by the Association of British Insurers in 2007 25 which was a guide on the engagement of investigators, Page 60</p>

<p>1 and one of the things that come out there is that 2 really -- and that dealt with really surveillance, which 3 is a method to use as a last resort, not to use as the 4 norm, and my understanding of what happened with the 5 mobile telephones interception was that it was being 6 used by -- obviously illegally, but it was being used as 7 a norm, as a norm tool of first resort. 8 LORD JUSTICE LEVESON: All right. Shall we take a short 9 break? We'll just have seven minutes. Thank you. 10 (11.30 am) 11 (A short break) 12 (11.37 am) 13 MR BARR: Mr Imossi, can I take you to paragraph 5 of your 14 discussion paper on page 4. You say there that the UK 15 is one of the remaining countries in what you describe 16 as the free world where there is no current system for 17 the vetting, registration or licensing of investigators 18 in the private sector. Do you know of any country which 19 might be described as part of the Western world which 20 does not have at least registration for private 21 investigators? 22 A. Germany, Norway. That's two I can think of off the top 23 of my head. 24 Q. But the majority have, do they? 25 A. Yes.</p> <p style="text-align: center;">Page 61</p>	<p>1 Q. Would you be able to provide the Inquiry with some 2 examples? 3 A. It's not a -- it's an opinion, it's not something that 4 I could point my finger at and say it's been tested in a 5 court of law, but -- 6 Q. Things that you would regard as unethical? 7 A. Yes, indeed. The one that is very typical is the 8 interception of emails, the unlawful interrogation of 9 computers that belong to a third party. 10 LORD JUSTICE LEVESON: That's being advertised on the 11 Internet? 12 A. It is, sir. I'm a little bit surprised, sir, that it 13 hasn't really hit the media as it should have done, 14 because -- 15 LORD JUSTICE LEVESON: Don't identify them now, but if you 16 could send the Inquiry some urls, I would be grateful. 17 A. Indeed, sir, I will. 18 MR BARR: You go on to make the point that the use of 19 illegal methods or unethical methods by unregulated 20 private investigators can put more scrupulous 21 investigators out of business. 22 A. Yes, indeed. 23 Q. Is that a real problem in the industry at the moment? 24 A. Well, it is when you bear in mind that some clients -- 25 and it happens to me on occasion, a client will come to</p> <p style="text-align: center;">Page 63</p>
<p>1 Q. You go on then in your discussion page to touch upon the 2 problem of hacking, blagging and bribery at paragraph 13 3 on page 6. Can I ask, do you have any personal 4 knowledge which will assist the Inquiry to establish how 5 extensive those practices have been? 6 A. The only information I could point towards is that which 7 is contained in the "What price privacy?" and the 8 follow-up report. We hear, obviously rubbing shoulders 9 with other investigators you hear of stories of things 10 going on, but I have to say that when I saw "What price 11 privacy?", it was a shock to see how extensive the 12 practices was. 13 LORD JUSTICE LEVESON: That's, of course, only one person. 14 A. Yes, but it did exhibit a list of prosecutions -- 15 LORD JUSTICE LEVESON: Yes. 16 A. -- as one of the exhibits. 17 MR BARR: One person at the centre of the web, but various 18 associates that he was working with. 19 A. Yes. 20 Q. What I would like to ask you about in this section is 21 what you mentioned in your second witness statement, 22 that you think there are illegal services on offer being 23 advertised on the Internet by unregulated private 24 investigators. Is that right? 25 A. Yes, it is.</p> <p style="text-align: center;">Page 62</p>	<p>1 me with a specific problem and ask me to prepare 2 a proposal, and then they're quite often a little bit 3 surprised that I haven't suggested providing some of 4 these illegal services like hacking into someone's bank 5 account or some of the other things that have been 6 identified. The consumer thinks it's the norm. 7 Q. I appreciate that you don't work yourself with the 8 media, but from your knowledge of your industry and your 9 accounts within the industry, are the media a big client 10 of the private investigation industry or not? 11 A. My answer would be very, very speculative. 12 Q. Don't speculate if you don't know. 13 A. I can't ... 14 Q. You go on then to develop the argument in your 15 discussion paper, explaining the efforts the IBA has 16 been making over the years. You explain at paragraph 20 17 that there's an agreement between the ABI and the DVLA 18 for the release of certain information under their 19 accredited trade association scheme, page 8, if you want 20 to turn it up. Has this scheme in your experience 21 allowed for a controlled and properly regulated flow of 22 information from the DVLA to investigators in lawful 23 circumstances? 24 A. Yes, very much so, and it was a prime example of the way 25 the Association would like to move things, because we do</p> <p style="text-align: center;">Page 64</p>

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<p>1 hear quite often coming from within the sector people 2 saying that we really ought to be given access to data 3 if we're going to be regulated. My personal attitude is 4 no, the access to data already exists by the permissive 5 exemptions within the Data Protection Act. What we have 6 to do is educate the data controllers and win their 7 confidence that we will treat the data responsibly and 8 within the restraints of law, and the success we've had 9 with our DVLA facility is one prime example.</p> <p>10 I would hasten to add I'm moving towards another 11 one, but I've had to launch last week an application to 12 the High Court asking for permission for judicial review 13 against one particular body that's dug its heels in and 14 will simply not talk to us about accessing a certain 15 database.</p> <p>16 Q. You then tell us about plans to launch an ABI academy. 17 A. Yes.</p> <p>18 Q. To provide accredited training for private 19 investigators. Is that a proposal that's going to go 20 forwards?</p> <p>21 A. Oh, very much. So we've been working on this since 22 a strategic decision was made in 2008 that we would make 23 every effort to try and move towards a chartered 24 institute or apply for chartered institute status. One 25 of the things that have held us up is getting the ABI</p> <p style="text-align: center;">Page 65</p>	<p>1 manual on how one could go around breaking the law and 2 it was felt that really that was the wrong thing to do, 3 and it was counter-productive to the very aims of the 4 document. And we felt it perhaps a little bit unfair to 5 then start putting a prison sentence when the 6 Information Commissioner himself had put temptation in 7 the path of those who might be minded to pursue that 8 path rather than the righteous one.</p> <p>9 Q. Is that really a good reason for opposing a custodial 10 sentence --</p> <p>11 A. No. The main reason was we saw it as a possible threat 12 to the move towards regulation. We have, as a matter of 13 policy, since changed that and I have written to the -- 14 I wrote to the Information Commissioner on behalf of the 15 Association only last year saying that the Association 16 is now fully in support of his campaign to bring about 17 the custodial sentence.</p> <p>18 LORD JUSTICE LEVESON: I don't understand the problem, 19 because of course no judge would send somebody to prison 20 for an accidental breach of the law, even though it's an 21 absolute offence, but might very well for industrial, 22 wholesale conduct of business on the basis of unlawful 23 access to data.</p> <p>24 A. I agree entirely, sir. But one has to bear in mind on 25 the other side of the coin the Data Protection Act is</p> <p style="text-align: center;">Page 67</p>
<p>1 academy knocked into shape. We've now got that in 2 shape, it's got all the right accreditation, right 3 approval, it has the SIA nod of approval that it would 4 be one of the qualifications it would look for in the 5 event of statutory regulation, and I have to say that 6 very much part of the examination questions that would 7 form part of that qualification would be based around 8 the Section 55 and other aspects of the Data Protection 9 Act.</p> <p>10 Q. Since you touched upon it, I was going to come to it 11 later, what is the ABI's position as to whether or not 12 a breach of Section 55 of the Data Protection Act ought 13 to carry a custodial sentence?</p> <p>14 A. When it was first announced or launched by the 15 Information Commissioner in his "What price privacy?" 16 document, we made a policy decision not to support it at 17 that stage for two reasons. Primarily we saw it as 18 a threat to the progress or the move towards regulating 19 the industry as a whole, that if a prison sentence was 20 available to the courts, that maybe the government would 21 be less encouraged to go towards the regulation side of 22 it.</p> <p>23 The second problem that we saw was one where in the 24 shock and awe effect of "What price privacy?", at the 25 same time the Information Commissioner exhibited the</p> <p style="text-align: center;">Page 66</p>	<p>1 not the simplest of statutes for anybody to follow, and 2 there are mixed messages that come out from the 3 Information Commissioner's office. For example, in the 4 closing evidence of the Information Commissioner himself 5 when he sat on this platform, he made a statement which 6 at the time when I watched it took my breath away, and 7 I held back thinking: did he really mean that? 8 I thought I'll wait, I'll rewatch it online, re-read the 9 transcripts, and indeed I came away thinking this may 10 send the wrong signals. And indeed, it did, because it 11 was brought to my attention that on two forums, 12 discussion forums, Internet discussion forums for 13 investigators -- not, I hasten to add, the ABI's one -- 14 a slant had been put on his words, almost hinting that 15 the Information Commissioner's tolerance of or 16 acceptance of the public interest defence could be 17 extended to beyond the media.</p> <p>18 As a consequence of that grey area, I sent a fax to 19 the Information Commissioner on Tuesday morning inviting 20 him to set the matter straight so that I could -- and 21 I would publish his response in our journal and send it 22 to the other forums, just so there is no 23 misunderstanding as to what investigators can or can't 24 do.</p> <p>25 LORD JUSTICE LEVESON: The law is comparatively clear. The</p> <p style="text-align: center;">Page 68</p>

<p>1 section --</p> <p>2 A. It is, sir, but what is not clear, and he used the term,</p> <p>3 rather unfortunately in my estimation, he referred to</p> <p>4 "the dark arts". I'm a little bit confused as to what</p> <p>5 the dark arts are.</p> <p>6 LORD JUSTICE LEVESON: Well, if you'd sat here for the last</p> <p>7 three months, I think you'd have understood the</p> <p>8 expression.</p> <p>9 A. Well, okay, but perhaps it's not as a severe methodology</p> <p>10 as I'd understood.</p> <p>11 LORD JUSTICE LEVESON: It's not. It is undeniably loose</p> <p>12 language, but it's really been used as shorthand for</p> <p>13 some of the conduct of the press about which complaint</p> <p>14 is made.</p> <p>15 MR BARR: You tell us at page 10, following the internal</p> <p>16 pagination of your discussion document, a little bit</p> <p>17 more about CRB checks. You've explained the position,</p> <p>18 but here on page 10 you tell us when the CRB check was</p> <p>19 introduced, 5 per cent of your members failed to renew.</p> <p>20 Of course there can be any number of reasons why</p> <p>21 a member fails to renew, but was that an abnormally high</p> <p>22 number of non-renewals for a particular year?</p> <p>23 A. Yes, it was. We had a problem, it was a new</p> <p>24 requirement, not seen before by the Association or</p> <p>25 indeed anywhere within the industry, and I suspect</p> <p style="text-align: center;">Page 69</p>	<p>1 price-driven, predominantly from the credit industry,</p> <p>2 and from what I understand, from what I've picked up</p> <p>3 through this Inquiry and the "What price privacy?"</p> <p>4 document, the media too, but I should imagine it's very</p> <p>5 much price-driven and the sheer gall of doing those</p> <p>6 activities.</p> <p>7 MR BARR: Thank you. Those are all my questions.</p> <p>8 LORD JUSTICE LEVESON: I have one question. Why is it, do</p> <p>9 you know, and if you don't know I may address the</p> <p>10 question to somebody else, why the Home Office moved</p> <p>11 away from implementing the statutory regulatory model</p> <p>12 that they were contemplating after the legislation?</p> <p>13 A. I don't know, sir.</p> <p>14 LORD JUSTICE LEVESON: Because it seems that in a business</p> <p>15 that is as fragmented as yours, without one predominant</p> <p>16 trade association, there's you and then there are</p> <p>17 others, as you've identified, it's difficult to see how</p> <p>18 a cohesive self-regulatory model can be established.</p> <p>19 A. The self-regulation works for us, for my Association.</p> <p>20 LORD JUSTICE LEVESON: Yes, but that's for 500 people. If</p> <p>21 you wanted to engage everybody, then are we going to</p> <p>22 have six different self-regulatory models?</p> <p>23 A. What our discussion paper suggests is that it doesn't</p> <p>24 necessarily have to be the Association of British</p> <p>25 Investigators that regulates. It's whatever body or</p> <p style="text-align: center;">Page 71</p>
<p>1 that -- it wasn't just failure to renew, we actually</p> <p>2 expelled en masse 18 who had failed to produce their</p> <p>3 first criminal conviction certificate. I don't think</p> <p>4 for one moment that it's because they had something to</p> <p>5 hide or something they didn't want us to see, because</p> <p>6 many of those eventually came back with their tail</p> <p>7 between their legs. They simply had not paid attention</p> <p>8 to the requirement. But it was disconcerting that for</p> <p>9 the renewal numbers that we actually saw this drop, and</p> <p>10 that did leave it open to the suspicion that perhaps</p> <p>11 there was an underlying problem that we simply did not</p> <p>12 have visibility to.</p> <p>13 Q. And a related fact, paragraph 28, you tell us is that</p> <p>14 since compulsory CRB checks were introduced by the ABI,</p> <p>15 not a single one of your members has been arrested,</p> <p>16 summoned or convicted of any criminal offence. Are you</p> <p>17 there trying to explain that the CRB check has had</p> <p>18 a very positive influence on behaviour?</p> <p>19 A. Yes, it has.</p> <p>20 Q. Finally, in the industry I'd like to ask you about</p> <p>21 clients. Is there a certain type of client in the</p> <p>22 industry who seeks out the more unscrupulous of</p> <p>23 investigators rather than the kite marked member of</p> <p>24 a reputable association?</p> <p>25 A. Yes, in my experience there will be those that will be</p> <p style="text-align: center;">Page 70</p>	<p>1 bodies are set up, so long as, as we suggest, they</p> <p>2 follow the ABI model.</p> <p>3 LORD JUSTICE LEVESON: Or they have their own model, but</p> <p>4 there has to be a model which is consistent, hasn't</p> <p>5 there?</p> <p>6 A. Exactly, sir. That's what I'm saying. Consistent with</p> <p>7 what the model -- the criteria that the ABI sets, ie</p> <p>8 that list of requirements to become a member and our</p> <p>9 policing of it.</p> <p>10 But if I could just go back to the Home Office</p> <p>11 factor, it may well have been one of cost or the sheer</p> <p>12 uncertainty of what they were getting involved in. When</p> <p>13 the impact assessment, the regulatory impact assessment</p> <p>14 document was put out in 2007, there were four options</p> <p>15 which appear in the -- Mr Butler's evidence. Option</p> <p>16 number three was to implement licensing, but only</p> <p>17 implement the test on criminality and identity, and to</p> <p>18 leave the issue of competency perhaps at a later date.</p> <p>19 It was my feeling and our Association's policy that</p> <p>20 our response be one to suggest that although option four</p> <p>21 is the ideal, by bringing competency, that really they</p> <p>22 ought to bring in option three to start off with, simply</p> <p>23 so that they could then identify the size of the</p> <p>24 industry, who they were, what they're doing and where</p> <p>25 they are. Then they could actually get their head</p> <p style="text-align: center;">Page 72</p>

<p>1 around how to regulate them more fully by bringing in                  2 competency, but I think they bit more than they could                  3 chew by going for the full monty, option four, and                  4 I think it was only a small minority of the stakeholders                  5 who responded to that consultation document that went in                  6 favour of option four. I can't remember the numbers.                  7 But it certainly would have been a very different                  8 situation now had they gone for that option three. It                  9 would have been very simple to have brought in, the                  10 infrastructure was already in place, they could now be                  11 working not on regulating but how to improve the                  12 standards and check the competency.                  13 LORD JUSTICE LEVESON: Thank you. Thank you very much.                  14 MR BARR: Sir, the next witness is Mr Palmer.                  15 MR DAVID PALMER (sworn)                  16 Questions by MR BARR                  17 MR BARR: Mr Palmer, make yourself comfortable, please, and                  18 then can you tell us your full name.                  19 A. My full name is David Charles Palmer.                  20 Q. Are the contents of your witness statement true and                  21 correct to the best of your knowledge and belief?                  22 A. Yes, they are.                  23 MR BARR: It's tab 40.                  24 LORD JUSTICE LEVESON: Yes, I have it.                  25 MR BARR: You tell us that you are the Principal of the</p> <p style="text-align: center;">Page 73</p>	<p>1 A. That would be accurate, yes.                  2 Q. Do you have any idea what the sort of membership overlap                  3 is?                  4 A. We've recently sought to find that out and found that it                  5 was quite difficult to do quickly, but I think it was in                  6 the region of 50, but that would be a semi blind guess.                  7 Q. What is your current membership, please?                  8 A. 353.                  9 Q. It's right, isn't it, although we needn't go into the                  10 details at all, that there is perhaps a possibility of                  11 a merger between the ABI --                  12 A. It is under discussion, yes.                  13 Q. -- and the IPI?                  14 You then set out the objects of the Institute, which                  15 I won't read out, they will be available to the website,                  16 and then the Code of Ethics. The Code of Ethics                  17 requires a promise from a member:                  18 "To conduct myself with honesty, integrity and to                  19 uphold the highest moral principles and avoid conduct                  20 detrimental to my profession; to conduct all                  21 investigations within the bounds of legality, morality                  22 and professional ethics; to guard my own professional                  23 reputation and that of my professional associates; and                  24 to uphold the objects of the Institute and abide by the                  25 Memorandum and Articles of Association of the Institute</p> <p style="text-align: center;">Page 75</p>
<p>1 Institute of Professional Investigators, which I shall                  2 refer to as the IPI from now on. You are also a serving                  3 police officer, currently based at the financial crime                  4 unit, Fraud Squad, of the Heddlu Gwent Police, if                  5 I haven't done violence to the pronunciation. You've                  6 previously had six years in the Royal Air Force police                  7 and 26 years in the Gwent police in various roles,                  8 including being in the criminal investigation department                  9 in 2002 and the Fraud Squad in 2006.                  10 You joined the Institute in 1990 and you've been                  11 a fellow since 1995, and on the board since 1996.                  12 Principal, 2001 to 2003 and then again from 2010 to the                  13 present.                  14 It's important, you remind us, to recognise that you                  15 are submitting this statement and your evidence is given                  16 in your capacity as principal of the IPI and not in any                  17 way as a police officer.                  18 A. (Nods head).                  19 Q. You tell us then a little bit more about the IPI. It                  20 was formed in 1976, when it broke away from the ABI                  21 because of the wish to create an academic arm to the                  22 trade association. Can I be clear, please, is it right                  23 that you can be a member of both the ABI and the IPI?                  24 A. You can be, yes.                  25 Q. And you are a more academic organisation than the ABI?</p> <p style="text-align: center;">Page 74</p>	<p>1 of Professional Investigators."                  2 Can I ask you now, how many instances have you had                  3 of members being disciplined for failing to live up to                  4 those ethical standards?                  5 A. My own experience was we conducted one, shall we say,                  6 appeal against a finding of culpability in respect of                  7 one member who had allegedly breached client                  8 confidentiality in that he'd used a film of                  9 a surveillance on the television, I think it was local                  10 television, and the client involved disputed the                  11 investigator's claim that the investigator had                  12 permission to use that film. That's the only occasion                  13 I know of where we've had a hearing, as such.                  14 Other complaints have been made, but they're usually                  15 about the size of an investigator's bill, which is                  16 purely a contractual matter between the client and the                  17 investigator, unsubstantiated, unclear allegations of an                  18 investigator's behaviour where a solicitor's made                  19 a representation on behalf of a client but refused to                  20 identify who the client was, so we applied the                  21 principles of fairness and said, "Without evidence, we                  22 can't really conduct an investigation", and that's                  23 pretty much the extent, my recollection, of any                  24 disciplinary issues with the Institute.                  25 Q. We've heard from the last witness that Mr Derek Webb, he</p> <p style="text-align: center;">Page 76</p>

<p>1 understands, was a member of the IPI. That's obviously                  2 a fact which has recently been asserted. Would you be                  3 able to check the membership records and inform the                  4 Inquiry as to whether or not that is correct?                  5 A. I have conducted a check today, having been made aware                  6 of it, and I conducted a check a while back when the                  7 name first came up. All I can tell you from our                  8 records, checks today, that he has not been a member for                  9 the fast three to four years, possibly five. Mr Imossi                  10 showed me the certificate, which was dated 2005, and it                  11 may well be he joined and then resigned or just failed                  12 to renew his subscriptions, but he's not currently                  13 a member.                  14 LORD JUSTICE LEVESON: I think he was encouraged to become                  15 a journalist. I think that was his evidence, wasn't it?                  16 MR BARR: Yes, it was, and so his membership must have been                  17 historic on any view. Do your records extend far enough                  18 back for you to verify it or are you accepting from what                  19 you've seen this morning that he was at some stage                  20 a member of the IPI?                  21 A. We are seeking to verify the extent of his membership.                  22 Q. Thank you. If you could let us know in due course what                  23 the outcome of your research is, we would be grateful.                  24 You tell us a little bit about the organisation. It                  25 has articles of association and by-laws, a board of</p> <p style="text-align: center;">Page 77</p>	<p>1 So identifying a qualification that fits a generic                  2 membership level is difficult. We have to look at                  3 individual qualifications and decide if that fits our                  4 bill, as it were.                  5 Q. You explain that the high level of membership at                  6 fellowship level requires either a higher qualification,                  7 recognition of an acceptable 8,000 word thesis on an                  8 investigatory subject, and you can also have honorary                  9 fellowships.                  10 You go on to tell us that the IPI is highly                  11 vociferous in support of licensing for investigators and                  12 would have preferred that high competency levels and                  13 qualifications had been sought by the SIA in its                  14 deliberations. In fact, the position is that there                  15 isn't any statutory regulation of private investigators                  16 at all --                  17 A. None at all.                  18 Q. -- at the moment, is there, so your preference for                  19 a high level of regulation has to be contrasted with the                  20 grand truth, which is that there is none at all.                  21 A. My statement was making reference, if you like, to what                  22 the SIA in one of their later consultation documents                  23 suggested would be the level of qualification, where                  24 somebody would be expected to have competencies in five                  25 areas that would require them to undergo 60 hours'</p> <p style="text-align: center;">Page 79</p>
<p>1 governors supported by a secretariat, disciplinary                  2 procedures, which might, at the top of the scale,                  3 culminate in dismissal. And you tell us then that the                  4 membership requirements are to have NVQ level 4 in                  5 investigations or something equivalent. Does that set                  6 quite a high threshold for membership of the IPI?                  7 A. Only on it was established that level 4 NVQs required                  8 a level of management qualification or experience and                  9 that was a decision made early on by the then board.                  10 Subsequently, NVQs fell into disuse. There were a few                  11 people that went through it, but it fell into disuse, so                  12 we couldn't really use it as our benchmark.                  13 What we have now is an assessment admissions                  14 committee, who look at the qualifications submitted by                  15 an applicant and decide on a level of participation                  16 based on those qualifications. What we try to do is                  17 keep them as high as possible, but we're also cogent of                  18 the fact that in the IPI, and this is where the term                  19 "private investigators" becomes a confusion, because                  20 a lot of our members aren't -- they are investigators                  21 and they work in the private sector, but they're not                  22 what a member of the public would understand a private                  23 investigator to be. For example, we have one forensic                  24 tax accountant, and we've had forensic accountants in                  25 the past.</p> <p style="text-align: center;">Page 78</p>	<p>1 training. That would be an exceptionally basic level of                  2 training if somebody could learn their trade in 60                  3 hours.                  4 At the high end, you can imagine we could have taken                  5 I believe it's Spain's template, where you have to have                  6 a degree before you can become a private investigator.                  7 That in itself would have been unworkable in the UK,                  8 I suspect. So what we would like is something that                  9 equates to perhaps -- and we explored this some years                  10 ago -- a legal executive. Somebody who is not expected                  11 to have the entire legal knowledge expected to run a law                  12 practice, but have sufficient to be able to assist a law                  13 practice.                  14 An investigator should in our mind have something at                  15 that level of knowledge, experience, competency, as it                  16 were. But as things stood with the SIA and for reasons                  17 which we fully understand, they had to go to a basic                  18 level because, again because of the breadth of nature of                  19 investigative work, trying to get a one size fits all                  20 competency was exceptionally difficult.                  21 Q. You tell us that the industry provides a distance                  22 learning course for investigators and the very first                  23 module deals with ethics and standards. Is that because                  24 ethics and standards are regarded as so fundamental to                  25 the work of your members?</p> <p style="text-align: center;">Page 80</p>

<p>1 A. Yes.</p> <p>2 Q. Is the distance learning available outside non-members?</p> <p>3 A. It's Internet-based, so you pay your fee and you can</p> <p>4 take as long as you want to undertake it, and there is</p> <p>5 the logistically influenced possibility of an</p> <p>6 examination at the end, which if passed and subject to</p> <p>7 any other criteria set by the admissions committee,</p> <p>8 could result in an award of associate membership with</p> <p>9 the Institute, but not full membership.</p> <p>10 Q. Do you think that there is a general lack of training in</p> <p>11 the industry? Is that your impression?</p> <p>12 A. The impression I've got over the years is that the</p> <p>13 majority of trained investigators have come from an</p> <p>14 investigative background where they've received training</p> <p>15 either could be through the forces, through the police,</p> <p>16 customs, HMRC, that way.</p> <p>17 The training for a private investigator outside</p> <p>18 those routes has tended to be, for example, provided by</p> <p>19 a distance learning course, from the Academy of Private</p> <p>20 Investigation, a BTech level 3. Those have come about</p> <p>21 pretty much since the suggestion that licensing will</p> <p>22 come into being. Prior to that, there was pretty much</p> <p>23 nothing except a couple of distance learning packages</p> <p>24 provided by -- I think there was one company called</p> <p>25 Meridian and another one called Streetwise. We looked</p> <p style="text-align: center;">Page 81</p>	<p>1 fact that people are out there conducting unlawful</p> <p>2 activities in the name of private investigation isn't</p> <p>3 a surprise to me, no.</p> <p>4 Q. What about blagging? When the Information Commissioner</p> <p>5 published "What price privacy?", was that a shock to you</p> <p>6 or not?</p> <p>7 A. No, I'm not surprised in the least. I've been aware</p> <p>8 that in the United States it's been considered a normal</p> <p>9 practice amongst investigators. Maybe not so much now,</p> <p>10 because the Americans are becoming more data protection</p> <p>11 conscious as time goes by, but years ago, phoning</p> <p>12 someone up and blagging information from them was</p> <p>13 considered arguably a legitimate investigative</p> <p>14 technique.</p> <p>15 Q. You seem to be describing a cultural problem so far as</p> <p>16 blagging is concerned. Do you think that the -- I think</p> <p>17 it was described as "shock and awe" by the last witness</p> <p>18 of the ICO's report, has that had an impact?</p> <p>19 A. I've not had any conversation with IPI participants</p> <p>20 about this specific matter. It's not come up as</p> <p>21 a matter of conversation, so I am not really in</p> <p>22 a position to answer that question with any authority.</p> <p>23 Q. Does the IPI educate its members about the unlawfulness</p> <p>24 of blagging and intercepting communications?</p> <p>25 A. As circumstances arise and events pass in time, we tend</p> <p style="text-align: center;">Page 83</p>
<p>1 at them and while we can't comment on the quality of the</p> <p>2 training packages, what we were conscious of was that</p> <p>3 they were put together by accountants and businessmen,</p> <p>4 not investigators.</p> <p>5 Q. I think your answer, informative as it is, is really</p> <p>6 talking as to what training is available. I think my</p> <p>7 question was more directed as to do you think there are</p> <p>8 significant numbers of people holding themselves out as</p> <p>9 private investigators who are untrained and subject to</p> <p>10 no requirement to be trained?</p> <p>11 A. Oh yes. Yes.</p> <p>12 Q. Can I explore what anecdotal evidence you might have</p> <p>13 come across in your position of Principal of the IPI</p> <p>14 about first of all phone hacking. Was the hacking</p> <p>15 scandal when it emerged a surprise to you or not?</p> <p>16 A. Um ... difficult question. Because my role isn't</p> <p>17 private investigation, as such, I suppose I was fairly</p> <p>18 neutral as an individual. In terms of looking at it</p> <p>19 having become aware of the event, it's not altogether</p> <p>20 surprising that that sort of thing happened. My own</p> <p>21 experience in my other role regarded a local</p> <p>22 self-appointed private investigator who was even being</p> <p>23 investigated by the local news and they did one of</p> <p>24 those -- not fly on the wall, exposes, documentaries on</p> <p>25 him and he was offering to bug people's houses. So the</p> <p style="text-align: center;">Page 82</p>	<p>1 to address those problems with articles through our</p> <p>2 journal The Professional Investigator which is sent by</p> <p>3 email to all the members who are on email and posted to</p> <p>4 those who request it. If an issue arises, then we tend</p> <p>5 to put something in writing and circulate it. If it's</p> <p>6 more urgent than that, we'll circulate it directly by</p> <p>7 email, and when the opportunity arises, we'll have</p> <p>8 a seminar.</p> <p>9 For example, relevant to this particular Inquiry,</p> <p>10 I think it would have been 2008 or 2009 we had two</p> <p>11 investigators from the ICO come to our annual general</p> <p>12 meeting and give a three quarter of an hour presentation</p> <p>13 on data protection legislation and what was Operation</p> <p>14 Motorman, the results and their findings and their</p> <p>15 opinions as to the way forward and what was going on in</p> <p>16 the private investigation -- information brokers'</p> <p>17 industry, shall we call it, because we -- as a sector,</p> <p>18 private investigators like to distance themselves,</p> <p>19 understandably, from those people who call themselves</p> <p>20 private investigators. Basically they're information</p> <p>21 brokers. They go out blagging, obtaining information</p> <p>22 unethically, shall we say, and passing it on to</p> <p>23 whoever's willing to pay for that information.</p> <p>24 Q. Can you help us now with your impression of the size of</p> <p>25 the market for unlawfully obtained data? To what extent</p> <p style="text-align: center;">Page 84</p>

<p>1 are you able to help us as to the number of people who 2 are out there trying to buy these services? 3 A. I really can't help on that. 4 Q. Can you help at all with either the importance of the 5 media sector to the industry as a client in general or 6 as to the sorts of services that they're seeking? 7 A. I'm afraid I can't. I've no -- had no conversation with 8 members where they've discussed the extent of their 9 contact with the media, if any. 10 Q. The ABI have explained in their evidence really quite 11 a detailed screening process for membership. The 12 process you've described is rather different. It's 13 based on an academic threshold. What character checks 14 does the IPI make? 15 A. We ask for two referees, which are then -- who are 16 contacted and the bona fides of the references checked. 17 We've recently introduced CRB requirements. Obviously 18 that wasn't available to us some years ago, but we've 19 been a bit slower than the ABI in that regard, but it is 20 now a requirement. Bankruptcy checks, CCJ checks and 21 years ago there was very much an everybody knew 22 everybody element to the industry. So our then 23 secretary general was a practising private investigator 24 and he knew someone who'd know somebody who'd know 25 somebody, so there was an undercurrent of "I know that Page 85</p>	<p>1 formal regulation, which means that those who are 2 licensed are thoroughly checked out before they are 3 licensed? 4 A. Yes. Our preference at the moment would be for 5 licensing by a regulatory authority like the SIA. 6 Alternatively, I was at a conference yesterday where the 7 SIA briefed that another alternative might be 8 self-regulation but with a statutory backing similar to 9 that of the GMC. That too would be acceptable to the 10 IPI. Self-regulation without any statutory backing, 11 I think, would be ineffective. 12 Q. Thank you. Finally can I ask you about your views on 13 a custodial penalty for breach of Section 55 of the Data 14 Protection Act? Where does IPI stand on that issue? 15 A. We're not averse to the concept of there being 16 a suitably robust punishment for these offences, but at 17 the same time as we're letting rapists and robbers off 18 with relatively light sentences, whether the 19 practicality of a custodial sentence or the threat of 20 a custodial sentence would justify its imposition -- 21 LORD JUSTICE LEVESON: Yes, you make it all clear on your 22 website, which is our page 2734, that the comparison of 23 issuing cautions for -- 24 A. Burglaries. 25 LORD JUSTICE LEVESON: -- burglaries or car thefts as Page 87</p>
<p>1 what I'm being told is true because I've investigated 2 it". Our secretariat now is not from the industry, so 3 we rely more on documentary evidence provided by 4 applicants. 5 Q. Proof of identity? 6 A. Proof of identity and we've also introduced an 7 interview, where appropriate, where a local member would 8 be asked to go and interview the applicant to see 9 whether, for example, you know, if they say they're 10 a professional investigator, are they in fact working 11 from a bedsit or do they have a proper office premises. 12 We suddenly became aware that without these checks we 13 could be letting in the traditional wannabe, somebody 14 who just wants the title of private investigator. 15 LORD JUSTICE LEVESON: Mr Palmer, the real problem is not 16 those who want to get involved in a professional 17 operation; it's the people who don't want to be involved 18 in a professional operation, who are perfectly content 19 to misuse ways of collecting information for their own 20 purposes. Isn't it? 21 A. Yes, but we would be concerned that they want to use 22 our -- the membership of our Institute -- 23 LORD JUSTICE LEVESON: Of course. 24 A. -- as a way of enhancing their ability to do just that. 25 MR BARR: Can I take it that what you would like to see is Page 86</p>	<p>1 opposed to those who sell data, but just to put the 2 thing into context, Mr Graham explained that if the 3 penalty is limited to a financial one, and as you know, 4 courts are always required to have regard to means to 5 pay, those who commit possibly quite serious breaches of 6 the data protection legislation may end up with 7 penalties that are little more than fixed penalties that 8 one might get for extremely trivial regulatory 9 offending, whereas those who are in the business of 10 industrial misuse of data for gain would not be capable 11 of pursuit or sentence at an appropriate level. 12 A. Yes, I'm reminded of what you said earlier, my Lord, and 13 I thought at the time -- I attended the WAPI conference 14 a while back and a solicitor made the observation and 15 I looked into it and it might be worth considering, if 16 this information is being obtained by fraud, whether the 17 sections 1 and 2 of the Fraud Act 2006 would apply which 18 has a ten-year sentence away. 19 LORD JUSTICE LEVESON: Yes. The interesting problem is the 20 ability to steal information, and if you're working in 21 this area, you will know the problems of that area of 22 the criminal law. 23 A. I want to stress I'm not averse to the concept of there 24 being a strict punishment. I was only questioning the 25 practicality. Page 88</p>

<p>1 LORD JUSTICE LEVESON: Well, I understand that. Nobody is                  2 suggesting that loss of liberty would be anything other                  3 than for the most egregious, repetitive and deliberately                  4 exploitative behaviour.                  5 MR BARR: Sir, thank you, that was all that I had for this                  6 witness.                  7 LORD JUSTICE LEVESON: Thank you very much indeed. Thank                  8 you, Mr Palmer.                  9 MR BARR: Sir, the next witness is Mr Smith, but before he's                  10 called, I've not yet had an opportunity to introduce                  11 myself to him. Might I ask for five minutes to do so?                  12 LORD JUSTICE LEVESON: Yes. Let me rise for just a few                  13 minutes.                  14 (12.21 pm)                  15 (A short break)                  16 (12.25 pm)                  17 MR BARR: Thank you, sir. Mr Smith is the next witness.                  18 LORD JUSTICE LEVESON: Thank you.                  19 MR ANTHONY SMITH (sworn)                  20 Questions by MR BARR                  21 MR BARR: Mr Smith, if you'd like to sit down and make                  22 yourself comfortable. I should explain at the start                  23 that you're standing in at short notice for Mr Withers                  24 who is unable to be with us today.                  25 LORD JUSTICE LEVESON: Thank you very much. That explains</p> <p style="text-align: center;">Page 89</p>	<p>1 investigators' trade association and representative body                  2 formed by professionals for professionals, being your                  3 slogan?                  4 A. Yes.                  5 Q. Could you tell us about what it was which caused the                  6 formation of WAPI?                  7 A. Although it was slightly before my time, it was as an                  8 alternative to the other associations. It has been                  9 mentioned here today that there are three associations;                  10 there are many more smaller ones, regional ones, local                  11 ones. The idea of WAPI was to try to encompass all                  12 investigators -- because the figures that have also been                  13 quoted today have been up to 10,000, and I believe it's                  14 nearer 10,000 than 5,000 investigators in this                  15 country -- was to bring everybody, or as many as we                  16 could, under an umbrella. That's the reason why it was                  17 formed.                  18 Q. And you have 420 members at present, according to the                  19 statement. Are you able to help us with how many of                  20 those members are United Kingdom members?                  21 A. Yes. To my knowledge, we have just under 300 United                  22 Kingdom members. Sorry, just under 200 United Kingdom                  23 members. Approximately 127 overseas, of which possibly                  24 40 are European. They're approximate figures, I've not                  25 got the exact figures here.</p> <p style="text-align: center;">Page 91</p>
<p>1 why I can't find his statement. Right.                  2 MR BARR: Could you give the Inquiry your full name, please?                  3 A. Yes, my name is Anthony Smith.                  4 Q. Could you confirm that you are the Vice-Chairman of the                  5 eGroup Moderator, Complaints and Discipline section of                  6 the World Association of Professional Investigators?                  7 A. Yes, I am.                  8 Q. And are the contents of the witness statement provided                  9 to the Inquiry by Mr Withers from WAPI, as I will call                  10 it, true and correct to the best of your knowledge?                  11 A. Yes, it is.                  12 Q. We are told in the statement that you have been                  13 a full-time investigator since 1977, working with                  14 Ferguson Investigations of Liverpool until the business                  15 was sold, and that you opened your own business in 1981                  16 in Liverpool. You are a founder member of the                  17 Merseyside Association of Investigators and Process                  18 Servers, and remained the secretary and treasurer of                  19 that association until 2000, becoming a life member in                  20 2007.                  21 You joined WAPI in 2002, and have been on the                  22 governing council since 2004.                  23 WAPI itself was formed in 2000, wasn't it?                  24 A. Yes, it was.                  25 Q. And it's a not for profit company set up as a private</p> <p style="text-align: center;">Page 90</p>	<p>1 Q. Can you help us with the entry criteria for joining                  2 WAPI? What does one have to establish to get in?                  3 A. It's a member application with references. We have to                  4 take two references. We will check the references up.                  5 We need proof of identity, proof that they've been in                  6 business for a period of time, at least a year.                  7 There are various categories. If they haven't been                  8 in business for a year, they can come in as                  9 a probationary member, trainee, et cetera, but it is                  10 very loose. It's very, very loose.                  11 Q. So when you say "very loose", what's the requirement, if                  12 any, to provide evidence of criminal convictions?                  13 A. No, we do not have that yet.                  14 Q. So it follows that a member -- somebody can join WAPI                  15 even though they have a criminal conviction?                  16 A. Well, we ask them, obviously, we do ask. They can lie,                  17 but we do not take up any CRBs.                  18 Q. You don't check?                  19 A. No.                  20 Q. Why is that?                  21 A. By the very reason being that as I say, because there                  22 are so many investigators who are unaligned to any                  23 association, it's a case of bring them in, then we'll                  24 look at it. You know, like the way that there's no                  25 legislation. Any legislation will do us at the moment,</p> <p style="text-align: center;">Page 92</p>

<p>1 because we have none. The case of let's get the 2 investigators in, and then we can examine how many we 3 have and what we're dealing with. We don't know what 4 we're dealing with.</p> <p>5 Q. I understand from the witness statement that the policy 6 of WAPI is that if somebody is convicted whilst 7 a member --</p> <p>8 A. They will be ejected, yes.</p> <p>9 Q. -- that would normally result in expulsion. What's the 10 position on a caution?</p> <p>11 A. It would depend. That would possible go to the GC level 12 where the GC would question the individual concerned, 13 depending on what it was.</p> <p>14 Q. Do you know if there have been any examples? Don't name 15 anybody.</p> <p>16 A. No, we've not had any examples.</p> <p>17 Q. Can I take it therefore that there are no credit checks 18 either?</p> <p>19 A. No, there are no credit checks.</p> <p>20 Q. No interview?</p> <p>21 A. If any points are raised to any member of the GC where 22 there may be a query, similar really to the IPI, as the 23 last witness said, they would put out in their journal. 24 If one of our members raises a question we will ask that 25 prospective member in for interview to explain</p> <p style="text-align: center;">Page 93</p>	<p>1 Q. You've given a personal view. Is there a house line? 2 Does WAPI as an association have a position on the 3 future regulation of the industry?</p> <p>4 A. We'd all like to be involved, yes, we would. Every 5 association would like to be involved. I don't think 6 it's a job for any association.</p> <p>7 Q. So you're against self-regulation and in favour of state 8 regulation?</p> <p>9 A. Yes.</p> <p>10 Q. You, like the other organisations, have an ethical code. 11 You deal with that at page 5 of your witness statement. 12 I'm not going to go through all the details. But the 13 salient point for our purposes is perhaps the first one, 14 which says: 15 "Conduct all investigations and allied matters with 16 integrity and within acceptable legal, professional and 17 moral guidelines." 18 I'm going to ask you in a moment what you mean by 19 "acceptable", but before we do that, I think it's only 20 fair that I read the penultimate bullet point which also 21 says: 22 "Comply with the regulatory and legal requirements 23 within their operational jurisdiction." 24 Against that background, what's an acceptable legal, 25 professional and moral guideline?</p> <p style="text-align: center;">Page 95</p>
<p>1 themselves.</p> <p>2 Q. What is the organisation's position on the future 3 regulation of private investigators?</p> <p>4 A. We'd like to see it happen. Certainly in my opinion, 5 and I can only speak from my opinion here, this 6 profession is in disarray, this profession is so 7 fragmented, there are so many associations, all with 8 a self-interest, and there are people who will not join 9 those associations because they feel that if they come 10 into the associations they will be tied by one person's 11 idea, another person's idea. It needs regulation. Via 12 the SIA would be ideal, but it needs firm regulation.</p> <p>13 Q. You said that was a personal view, so we'll continue in 14 that vein. What level of regulation do you think is 15 realistic and appropriate going forward? Are we talking 16 just registration or about competency requirements?</p> <p>17 A. I think it would have to be competency, but once again, 18 to just ask for registration to get people to come 19 forward who would not normally come forward. There are 20 investigators out there, as I say, who are completely 21 unaligned, members of no association, but they would 22 like something. By issuing a licence, a provisional 23 licence, for a first 12 months or whatever, I don't know 24 how it would work, I have no idea, but we need to do 25 something.</p> <p style="text-align: center;">Page 94</p>	<p>1 A. As long as it was legal. That would be the underline. 2 Q. The other bullet point which I'll draw attention to is 3 that there's a requirement at all times to protect the 4 good reputation of members, clients, the association and 5 the profession in general. 6 You then tell us about training, and you tell us 7 that certainly at the time this statement was drafted 8 there was due to be a convention in Greenwich in 9 November of last year entitled "Hacking, blagging, 10 bugging and tracking -- the law".</p> <p>11 A. Yes.</p> <p>12 Q. Did that go ahead?</p> <p>13 A. Yes, it did.</p> <p>14 Q. What is WAPI's position so far as hacking is concerned?</p> <p>15 A. Once again, if it's illegal, it's illegal.</p> <p>16 Q. Blagging?</p> <p>17 A. Illegal.</p> <p>18 Q. Can I ask you a little bit now about your experience of 19 the industry in general? To what extent is it your 20 sense that there are illegal data gathering practices 21 going on at the moment?</p> <p>22 A. I think it's always gone on. I think it always has.</p> <p>23 Q. Do you think there has been any improvement in the 24 position since, first of all, the publication of the 25 Information Commissioner's report "What price privacy?"?</p> <p style="text-align: center;">Page 96</p>

24 (Pages 93 to 96)



<p>1 A. Yes, I think so. I think maybe prior to that there was                  2 a degree of -- there were a lot of as people call grey                  3 areas, I'm not too sure about that, but there were grey                  4 areas that people were making use of.                  5 Q. But still going on nevertheless?                  6 A. Yes.                  7 Q. And what about the impact of the phone hacking scandal,                  8 which received so much publicity last year? Do you                  9 think --                  10 A. I was amazed at the extent of it. We all knew it was                  11 going on, but I was amazed at the extent and the                  12 unnecessary -- sorry, the unnecessariness of some of it.                  13 It just seemed to be the first point of action for some                  14 people.                  15 Q. Is it still going on?                  16 A. I have no personal knowledge of it, but I presume it                  17 would be.                  18 LORD JUSTICE LEVESON: Well, I think we can all speculate                  19 about that. One way or the other.                  20 MR BARR: But you can't help us --                  21 A. No, not with any fact.                  22 Q. -- with any firm information. Can you help us with                  23 recent disciplinary activity by WAPI? Has WAPI had to                  24 take disciplinary action against any members recently?                  25 A. Our last one was just over a year ago, we had to evict                  Page 97</p>	<p>1 a politician who may be taking bribes or may be having                  2 an affair with a -- he can be pressurised in some way,                  3 that again is a grey area. Public interest.                  4 Q. What sort of methods are we talking about here? Are we                  5 talking about investigators thinking that it's all right                  6 to follow somebody or are we talking about the use of                  7 even more intrusive methods such as intercepting                  8 communications or blagging?                  9 A. No, I would only say surveillance. It would come from                  10 surveillance. If sufficient time was put in, it will                  11 come from surveillance.                  12 Q. You say in the statement you found no member who                  13 indicated that they'd been requested to perform illegal                  14 acts such as phone hacking, bugging or similar.                  15 A. No.                  16 Q. Can I ask you next what your view is as to whether or                  17 not there should be a custodial penalty for a breach of                  18 Section 55 of the Data Protection Act?                  19 A. I think yes, for the ultimate breach. Obviously there                  20 would be mitigation in there, but yes.                  21 MR BARR: Thank you. Those were all the questions that                  22 I have for you.                  23 LORD JUSTICE LEVESON: Thank you very much indeed. Thank                  24 you for coming and standing in for Mr Withers.                  25 A. Thank you.                  Page 99</p>
<p>1 somebody from the Association. It was nothing to do                  2 with hacking or blagging, it was an argument between                  3 a client -- the member did not (a) respond to me or (b)                  4 respond to the client -- initially respond to the client                  5 or (b) respond to me. It was considered that the only                  6 way to go was to evict him from the Association. That                  7 company still trades. Where's my teeth? Ain't got it.                  8 Q. The section of the witness statement which starts at the                  9 bottom of page 6 is entitled "The media and private                  10 investigators."                  11 It says that the media have been a relatively common                  12 work source for a number of agencies throughout the UK;                  13 is that your understanding?                  14 A. Yes. I would say so, yes.                  15 Q. And you say:                  16 "The instructions are generally for the locating of                  17 individuals, untangling company groups and obtaining                  18 information in respect of persons who are or may be the                  19 subject of a newspaper story. The general consensus is                  20 that in accepting such instructions, the specified                  21 requirements are in the public interest."                  22 What's your understanding of the public interest                  23 test in these circumstances?                  24 A. That it is a difficult one. I could only say that                  25 I would have to judge at the time. If it is                  Page 98</p>	<p>1 MR BARR: Sir, the next witness is Mr Butler, who has                  2 arrived, I think, since we resumed with the last                  3 witness, so again, might I ask you for five minutes to                  4 introduce myself to him, please?                  5 LORD JUSTICE LEVESON: Yes.                  6 (12.41 pm)                  7 (A short break)                  8 (12.44 pm)                  9 MR BARR: Sir, thank you for the short adjournment. It                  10 transpires Mr Butler has been sitting listening to the                  11 evidence all morning. Perhaps he could be sworn in,                  12 please.                  13 MR WILLIAM ANDREW BUTLER (sworn)                  14 Questions by MR BARR                  15 MR BARR: Mr Butler, make yourself comfortable, please.                  16 Could you give us your full name.                  17 A. William Andrew Butler.                  18 Q. Are the contents of your witness statement true and                  19 correct to the best of your knowledge and belief?                  20 A. They are.                  21 Q. You tell us that you are the Chief Executive of the                  22 Security Industry Authority and have been so since July                  23 of 2009. You previously held the post of Director of                  24 Corporate Services at the Gambling Commission, and                  25 you've also worked previously with the Audit Commission                  Page 100</p>

<p>1 and the Healthcare Commission. You have a degree in law                  2 and you are a member of the Chartered Institute of                  3 Public Finance and Accountancy?                  4 A. That's true.                  5 Q. The SIA is a statutory body, established by the private                  6 security industry at 2001, as amended, and it's the                  7 organisation responsible for regulating the private                  8 security industry?                  9 A. That's correct.                  10 Q. Its mission is to regulate the private security industry                  11 effectively, and you have two main duties. The first is                  12 compulsory licensing of individuals undertaking                  13 designated activities within the private security                  14 industry, and the other is managing voluntary approved                  15 creditor schemes.                  16 A. That's correct.                  17 Q. Perhaps I could pause at that juncture for you to                  18 explain to us what you're meaning by the "private                  19 security industry", because it's plainly very much wider                  20 than private investigators?                  21 A. It is indeed, and arguably wider than the scope of what                  22 we regulate. What we regulate at the moment are those                  23 activities which have been designated under the Private                  24 Security Industry Act. They include man guarding,                  25 that's security guarding, door supervisors, close</p> <p style="text-align: center;">Page 101</p>	<p>1 yet regulated by you?                  2 A. That's correct.                  3 Q. Your statement then sets out at some length the activity                  4 that there has been in trying to devise a way forward                  5 for the regulation of private investigators, and it's                  6 right, isn't it, that there has been an intention to                  7 regulate private investigators effectively throughout                  8 the entire existence of the SIA?                  9 A. They weren't included in the original tranche of                  10 designated activity, but from the very outset, first of                  11 all informally and then more formally, consultation has                  12 taken place with a view, and I think you're absolutely                  13 right, the intent has always been there, the willingness                  14 has always been there, and the desire, certainly on our                  15 part, to bring private investigations. It's quite an                  16 important distinction. What the Act contemplates is the                  17 licensing of those involved in private investigations,                  18 not of private investigators. It's quite an important                  19 distinction in terms of the breadth of what is covered.                  20 We have failed singularly to achieve that so far.                  21 If I summarise, and I'm happy to elaborate otherwise,                  22 there are a number of issues which have prevented us as                  23 it were at a micro level on private investigations which                  24 range from issues around the availability of training,                  25 issues around the availability of parliamentary time to</p> <p style="text-align: center;">Page 103</p>
<p>1 protection operatives, people who handle cash and                  2 valuables in transit and those who do public                  3 surveillance using CCTV.                  4 We also currently licence vehicle immobilisers                  5 commonly known as wheel clampers, that's expected to                  6 become unlawful at some point in the future and we'll                  7 stopped licensing then, and people who hold keys as                  8 secure holders.                  9 As well as private investigators, there are other                  10 sectors which could be designated, for example security                  11 consultants, which have never been, and arguably there                  12 are other elements of the private security industry, for                  13 example those who install alarms or provide security                  14 software, who aren't currently contemplated in the Act,                  15 although the Act does allow the Secretary of State and                  16 the Home Office to introduce new sectors by order, so                  17 it's capable of extending. But man guarding, vehicle                  18 immobilisers and key holders are those currently                  19 covered.                  20 Q. You tell us that licensing ensures that private security                  21 operatives are fit and proper persons, properly trained                  22 and qualified to do their job. Perhaps it's at this                  23 stage I can ask you about the position with private                  24 investigators. The position is, isn't it, that they're                  25 not yet designated activities and therefore they are not</p> <p style="text-align: center;">Page 102</p>	<p>1 get the order through, and then there are more macro                  2 issues at an organisational level.                  3 This is one of the things that we have been doing.                  4 We have rolled out more broadly regulation across the                  5 whole of the UK, we've had problems internally on                  6 occasions in the past, and in the latest incidents we                  7 were ready to go but the questions as to the future of                  8 regulation more broadly have kind of put a hold on that                  9 and I think it's also fair to say that neither I -- and                  10 I can't speak for the Home Secretary, but I would assume                  11 in this case the Home Secretary -- would want to move                  12 forward now without the benefits of the recommendations                  13 of this Inquiry.                  14 Q. There are a number of exhibits to your witness statement                  15 which take us through the history in detail. I'm not                  16 proposing to go to them in any detail at all, but it is                  17 right, isn't it, that there have been quite extensive                  18 consultation exercises to see what the industry wants?                  19 A. There has, and I think it's not just those who provide                  20 private investigation. I mean, we've talked to police,                  21 serious organised crime, people -- to other agencies.                  22 Q. I think the term is stakeholders.                  23 A. Stakeholders is a term.                  24 LORD JUSTICE LEVESON: No, I prefer you not using that word                  25 A. Yes, I'm with you on that, sir. We've spoken to lots of</p> <p style="text-align: center;">Page 104</p>

<p>1 people. I think it's difficult to find anybody who 2 doesn't think this is a good thing and something which 3 should happen.</p> <p>4 MR BARR: So the bottom line is everybody thinks it's a good 5 thing, but for various unfortunate reasons, nothing has 6 yet happened?</p> <p>7 A. That would be a fair summary.</p> <p>8 Q. Can I ask you then to tell us what is the position at 9 the moment, so far as future intentions are concerned?</p> <p>10 A. You'll forgive me if I talk a bit about how regulation 11 might happen in the future, first, because I think that 12 is the context in which we would be moving. Following 13 the arm's length bodies review, which the government 14 conducted following the election in 2010, it was 15 announced that regulation of the private security 16 industry would no longer be carried out by 17 a non-departmental public body and there with be 18 a phased transition to a new regulatory regime. We've 19 been working with the Home Office and with the industry 20 on what that might look like in future, and in the 21 spring of last year, the government announced that there 22 would be a new regime, there will continue to be robust 23 statutory regulation of the private security industry, 24 but the SIA at some point will be abolished in its 25 current form and replaced with a regulator outside the</p> <p style="text-align: center;">Page 105</p>	<p>1 excluded in private investigations within schedule 2, 2 one of which is where the collection of information or 3 the investigation is exclusively for journalistic 4 purposes.</p> <p>5 LORD JUSTICE LEVESON: That's excluding? 6 A. The schedule excludes the collection of information. 7 The nature of the exclusion, I understand --</p> <p>8 MR BARR: We'll be coming back to the exclusion in a little 9 more detail, if that's convenient.</p> <p>10 LORD JUSTICE LEVESON: Certainly.</p> <p>11 MR BARR: If that's the position at the moment, can I get 12 a feel, and I understand it's not entirely your gift by 13 any means, as to what sort of level of certainty we 14 might have that something is going to happen in the 15 short term?</p> <p>16 A. Subject to the fact that I can't bind the Home 17 Secretary --</p> <p>18 Q. What's your finger on the pulse --</p> <p>19 A. -- my personal view is there is a willingness to move 20 forward, and to actually get private investigations into 21 regulation. I have to say that with the best will in 22 the world, that's not something that can happen quickly. 23 Part of our problem has been that you have to have the 24 capacity to test competence, the creation of a training 25 formula, and you've heard already today that there have</p> <p style="text-align: center;">Page 107</p>
<p>1 government sector. I think somebody's already referred 2 to something along the GMC model.</p> <p>3 I wouldn't use the word "self-regulation" in that 4 phrase, because it will still be statutory and 5 independent, largely, with greater industry involvement.</p> <p>6 In that context, that's where most effort on policy 7 has been aimed over the last 12 months, as I'm sure 8 you'll appreciate. However, the other commitment within 9 that is at no point would the regime be weakened or 10 narrowed. So the intention is still that the 11 possibility of picking up private investigations would 12 exist, and I think it's fair to say that that could be 13 done either in anticipation of the new regime and 14 accommodated within the new regime, or as part of the 15 creation of the new regime.</p> <p>16 LORD JUSTICE LEVESON: Tell me how.</p> <p>17 A. It requires the Home Secretary to take forward an order 18 designating the private security -- designating private 19 investigations. That's subject, I believe, to the 20 negative resolution process, although I would have to 21 check that. It's likely that before that happened, the 22 definition that currently sits in the Private Security 23 Industry Act, which I think is in schedule 2, may need 24 to be reviewed in the light of current developments. 25 For example, there are a number of areas which are</p> <p style="text-align: center;">Page 106</p>	<p>1 been consultations on that, but there's not entire 2 agreement on those competencies, then the creation of 3 accredited courses, then the training of trainers and 4 the establishment of sufficient training to train, and 5 our working assumption is around 5,000 people, in order 6 to allow them to be licensed under the regime, is not 7 something that would happen overnight. It would require 8 a period of time. Given that failure to have a licence 9 and operating would then constitute a criminal 10 conviction, you have to give people the time to do the 11 training and to register appropriately. So a period of 12 at least 12 months, possibly 15, is going to elapse 13 between the point at which there is confirmation and 14 there is an enforcement date, I suspect.</p> <p>15 Q. And so the model that's being put forward at the moment 16 is very much more than simply registration; it is full 17 competency testing?</p> <p>18 A. Our model sits on two fundamental pillars. We also 19 check identity and right to work in the UK, but the two 20 fundamental pillars are the fit and proper, which 21 involves an assessment of criminality, and competence, 22 which involves the individual being able to demonstrate 23 that they've met a nationally prescribed and described 24 qualification.</p> <p>25 I think I should point out that that's to allow you</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

<p>1 to work in the industry. I think earlier today there 2 may have been some confusion in language. It's not that 3 you're fit to have a particular job; it's that you are 4 licensed to work in the industry. The decision as to 5 whether you get a particular job is a decision that 6 rests with the employer and not the licensing, but you 7 can't apply for that job without being licensed.</p> <p>8 Q. And in terms of the level of checking of criminal 9 records history, is it, as we heard from Mr Imossi, 10 envisaged that that will involve a full CRB check?</p> <p>11 A. It won't involve the enhanced CRB check. We've done 12 research as to the benefits of enhanced checks. In the 13 past across the entire population of the people we 14 licence -- in total we're currently running at 371,000, 15 so it's up on the figures that we gave in my statement 16 in October -- the number where enhanced checks would 17 make a difference are small, the cost would be 18 significant, so it's a standard check that we use. The 19 existence of criminality does not preclude licensing. 20 Our "get licenced" standards really assess the severity 21 of the criminality and how recent and how established it 22 is and that criminality includes everything from 23 a caution through to time in prison or otherwise.</p> <p>24 Q. Can I just explore next about where this regulation is 25 going to be focused? You talked about the individual</p> <p style="text-align: center;">Page 109</p>	<p>1 know from you precisely what assistance I can give you 2 and/or the Secretary of State to provide weight to the 3 view that the regulation of this industry should happen 4 sooner rather than later.</p> <p>5 A. I'm happy to think about that and I think it's probably 6 something that I would want to come back to you on, but 7 probably jointly with officials and I think that may be 8 possible. Perhaps, if we came back to it after lunch, 9 I could speak to my colleagues.</p> <p>10 LORD JUSTICE LEVESON: Yes. I don't insist that it's today. 11 I'm going to be here for some time yet. But nothing 12 that I have heard in the last three months persuades me 13 other than the view that this is an industry that does 14 require regulation, and I don't believe, simply on the 15 basis of what I've heard today, that it could be 16 a self-regulatory model, given the fractured nature of 17 the associations that are involved in it. I don't 18 anticipate you disagree with that?</p> <p>19 A. I agree entirely with that.</p> <p>20 LORD JUSTICE LEVESON: Right. Thank you. We'll pause 21 there, but there's one thing I want to say. 22 Ms Boase, this is going to involve you and, indeed, 23 other core participants. In the light of the 24 submissions that have been made in relation to the 25 question of anonymous evidence, at my request</p> <p style="text-align: center;">Page 111</p>
<p>1 having to be licensed, but is it right there's going to 2 be more of an emphasis on regulating the businesses than 3 the individual?</p> <p>4 A. Yes. The prime focus of the new regime would be on 5 licensing businesses. We have no doubt, and the 6 feedback from the industry supports this, that 7 fundamentally in the private security industry you need 8 to get a grip on businesses if you're going to get 9 a grip on -- unfortunately this is not the only area 10 where there are concerns about the practices.</p> <p>11 Having said that, the new regime will continue to 12 require that individuals are registered with the 13 regulator --</p> <p>14 LORD JUSTICE LEVESON: So it will be a regulatory offence to 15 employ somebody who is not authorised?</p> <p>16 A. Either a company which is not licensed or an individual 17 who is not registered.</p> <p>18 LORD JUSTICE LEVESON: Save, except, for secretaries or that 19 type of --</p> <p>20 A. Yes, they would have to be people who were engaged 21 specifically in the activities which are designated.</p> <p>22 LORD JUSTICE LEVESON: All right. Let's pause there until 23 2 o'clock.</p> <p>24 Mr Butler, I won't require you to do this today, but 25 you could think about it over lunch: I would like to</p> <p style="text-align: center;">Page 110</p>	<p>1 Ms Stanistreet has provided a further statement that 2 deals with what I might call the technical rather than 3 substantive concerns about the evidence that she 4 previously provided.</p> <p>5 For my purposes, I would be happy for short further 6 submissions. I think News International will have 7 received it, and similarly Associated Newspapers will 8 have received it, and if the Guardian haven't, doubtless 9 they will. I'm very content to receive short written 10 additional submissions. If it's easier for us all to 11 come tomorrow, we can do that, but I would have thought 12 that something in writing, if anybody wants to add 13 anything, by lunchtime tomorrow would be sufficient. 14 But if you'd just think about that or ask Mr White, and 15 Mr Caplan did make an appearance but didn't stay long 16 enough to hear this, so if he could be asked that 17 question, and similarly I don't think it is likely to 18 impact on the Metropolitan Police, whose submissions 19 I've seen.</p> <p>20 All right, 2 o'clock. Thank you. 21 (1.05 pm) 22 (The luncheon adjournment)</p> <p style="text-align: center;">Page 112</p>

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