

<p>1 2 (2.00 pm) 3 LORD JUSTICE LEVESON: Yes. 4 MR BARR: Thank you, sir. 5 Mr Butler, before the luncheon adjournment, we were 6 exploring possibilities for the future, in particular 7 the model which concentrated more on businesses than 8 upon individuals. Can I just put this to you: this is 9 an industry where there are a lot of self-employed 10 private investigators and, one supposes, a lot of 11 one-man bands. How does a system which focuses upon 12 business rather than the individual ensure proper 13 regulation of the self-employed and the one-man band? 14 A. In part, for the reasons I described earlier, we are not 15 abandoning the standards that are required of 16 individuals anyway. This is an enhancement of it. It's 17 not dissimilar to other sectors. The door supervision 18 sector is populated by individuals who are self-employed 19 or small companies, and so are the close protection 20 sector. 21 The proposals, they are no more than that, they have 22 yet to be developed, but quite clearly recognise that 23 individuals who are self-employed will be captured as 24 individuals in not a dissimilar way to the arrangements 25 now.</p> <p style="text-align: center;">Page 1</p>	<p>1 LORD JUSTICE LEVESON: The criteria may be slightly 2 differently formulated because the systems would be 3 required for the company which might not be required for 4 a one-man band, but that would be the difference. 5 A. Fit and proper issues for a company are of a different 6 nature, a different order, but they are still about fit 7 and proper and about the competence of the company at 8 another level. 9 LORD JUSTICE LEVESON: Yes. 10 MR BARR: Moving on to a different topic, section 55 of the 11 Data Protection Act and whether it should carry 12 a custodial sentence, as I understand the SIA's 13 evidence, it's that certainly what is being proposed 14 would not be incompatible with that, but does the SIA 15 have a view one way or the other as to whether that is a 16 good idea? 17 A. We don't formally have a view one way or the other, and 18 as far as the regime is concerned, as I mentioned before 19 lunch, if somebody is cautioned it's treated as 20 a criminality issue and dealt with within our regime. 21 The seriousness of it in terms of how it's disposed by 22 the court might add to the length of time before 23 somebody can be considered for a licence, but it's not 24 germane. I have on a number of occasions spoken to the 25 Information Commissioner about this, and I know he's</p> <p style="text-align: center;">Page 3</p>
<p>1 The advantage, and I think this was also referred to 2 this morning, is companies that reemerge where the 3 controlling mind in the company, the attitude and 4 approach in the company is not one that you would wish 5 to tolerate, and those at the moment are a problem more 6 generally in the private security generally, it wouldn't 7 just be in the private investigating sector, where they 8 can reappear and where the controlling mind or those who 9 are actually operating and directing are able to 10 reappear as a new business. 11 What this allows us to do is to address the 12 business, however small, and within our approved 13 contractor scheme we already have businesses which meet 14 good standards which run from micro through to very, 15 very large companies, and we already have arrangements 16 in place which will allow us to address the individual 17 issues. 18 But at the heart of that, I come back to the fact 19 that that basic criminality, fit and proper and the 20 competence test will remain. They won't disappear. And 21 they will be policed by the regulator. 22 LORD JUSTICE LEVESON: Yes, it doesn't matter whether you're 23 a one-man band or you employ 150. You have to meet the 24 criteria. 25 A. Exactly.</p> <p style="text-align: center;">Page 2</p>	<p>1 passionate, but in formal terms I don't have a view. 2 Q. Can we now turn to page 8 of your statement and 3 paragraph 24, to look at the exclusion clause in the 4 PSIA which you briefly touched upon before lunch, and 5 which appears to provide an exclusion in relation to 6 journalism. Let's look at the clause. It says: 7 "This paragraph does not apply to activities carried 8 out for the purpose of obtaining information exclusively 9 with a view to its use, or the use of information to 10 which it relates, for the purposes of or in connection 11 with the publication to the public or to a section of 12 the public of any journalistic, literary or artistic 13 material or of any work of reference." 14 I would like to explore with you your understanding 15 of what that means. Is it your understanding, first of 16 all, that it means that a journalist would not, could 17 not be, as a matter of law, subject to regulation by the 18 SIA, even if private investigators were to fall under 19 your remit? 20 A. The point is, of course, moot. The designated section 21 has never been brought in, so this has never been 22 tested. So really on the basis of how we feel at the 23 moment, and in paragraph 25 we've set out what the 24 explanatory note said. 25 I think key in this is the word "exclusively", which</p> <p style="text-align: center;">Page 4</p>

<p>1 kind of narrows the parameters slightly, and I'm advised 2 that the form of words at the end is picked out of human 3 rights legislation in terms of freedom of the press, so 4 it's a standard form of words. 5 I think it's certainly true to say that if the 6 designated activity was as currently defined in the 7 PSIA, it would, at best, cause some confusion as to what 8 was in and what was out, particularly around the matters 9 that this Inquiry has been looking at. 10 LORD JUSTICE LEVESON: That's what bothers me. It's not 11 Mr Barr's concern, and I'm sure he'll be coming on to 12 it, namely the position of journalists, whether 13 a journalist would have to be licensed. I'm much more 14 interested about the private detective who says, "Well, 15 I'm doing this entirely for this particular newspaper 16 and they're doing it entirely for journalistic 17 purposes". 18 A. That would be my concern, sir, as well. I have to say 19 that I think there's a broader issue, and perhaps this 20 reflects partly on one of the questions that you asked 21 me before lunch, is that paragraph 4, which defines the 22 activity of private investigations, was phrased as 23 a part of the passage of the 2001 Act. It has not been 24 touched since then. And it may be that one of the 25 things that would help is some consideration of how this</p> <p style="text-align: center;">Page 5</p>	<p>1 LORD JUSTICE LEVESON: Yes. 2 A. But I think it's important in the light of the 3 considerations here that this definition should go -- 4 I ought to say in the interests of fairness that it's 5 not just journalistic activity that's excluded. Market 6 research and lawyers and accountants are also excluded. 7 LORD JUSTICE LEVESON: Of course. 8 A. For perfectly good reasons. So it's not just that 9 journalism is the only thing that is excluded. 10 LORD JUSTICE LEVESON: No, you're trying to catch those who 11 are in the business of conducting private 12 investigations. 13 A. I think there are two questions there. One is: how do 14 we define private investigations to make sure it covers 15 what the broader church -- so we don't define ourselves 16 out of areas in that respect. And how do we cover this 17 issue around the balance between the freedom of the 18 press and the human rights issues, which I think this 19 clause was inserted for, and making sure there is still 20 effective regulation of those who are carrying out 21 private investigations in some sort of capacity related 22 to the press. That is an area, I think, where some help 23 and consideration would be appropriate. 24 LORD JUSTICE LEVESON: Well, you've already understood what 25 I'm keen to have from you, and if there's anything, any</p> <p style="text-align: center;">Page 7</p>
<p>1 activity might best be defined for the future. 2 It's possible under the Act to use secondary 3 legislation to add and to redefine. I suspect that 4 changing such an exclusion as this might not be possible 5 by secondary legislation, although that's not my area of 6 expertise, but certainly if we were to be designating 7 this activity, I think we would want to be working on 8 the basis that it was designated and defined in a way 9 which reflected current practice and concerns, rather 10 than the position in 2001. 11 LORD JUSTICE LEVESON: I'm sure that's right, because of 12 course it's not that I want a journalist to have to be 13 licensed. The journalist will have his own potential 14 defence even now under Section 55, and he can argue it 15 out, if it's necessary, in court. It's rather that the 16 detective or investigator shouldn't have a way out 17 consequent upon an exclusion which wasn't designed for 18 that purpose. 19 A. I agree entirely. For the avoidance of doubt, I have 20 absolutely no desire to regulate journalists. 21 LORD JUSTICE LEVESON: No, I'm sure you don't. 22 A. But I do -- 23 LORD JUSTICE LEVESON: Actually, the trouble is I'm finding 24 difficulty in finding somebody who does! 25 A. I'm prepared to sell you a regime framework, I think.</p> <p style="text-align: center;">Page 6</p>	<p>1 other area, that you think I've omitted but where you 2 can provide me with assistance, then provide it. 3 A. Thank you. 4 MR BARR: If the position in relation to journalists is 5 clear from the wording with the assistance of the 6 guidance note, what I'd like to explore is what the 7 Chairman mentioned a moment ago, the position of the 8 private investigator. If the private investigator's 9 investigations -- remembering that it's investigations 10 that the statute latches onto -- is working for 11 journalists and also doing other private investigatory 12 work, would you see that that sort of person would be 13 a person who would fall under your regime, if it were to 14 come into force? 15 A. If part of their work -- if any part of their work fell 16 under the definition, they would be required to be 17 licensed. It may be that the part of the work that they 18 were doing wholly and exclusively for purposes of 19 journalism might be in doubt. However, if they 20 misbehaved in that section, our regime is broad enough 21 to pick them up. If they were subsequently arrested or 22 charged or committed some sort of misconduct, we could 23 look at that in the context of whether they should 24 continue with the licence. The answer to your question 25 is this is a kind of minimal issue. If you are doing</p> <p style="text-align: center;">Page 8</p>

<p>1 any of these activities, then you must be licensed. So 2 if a small part of your activity is other than, then you 3 would be called to be licensed. 4 Q. So where the real issue is is a person who works 5 exclusively doing private investigation for journalists? 6 A. That's where the issue would be, if this was designated 7 in its current form, yes. 8 Q. So that is a particular matter that requires some 9 careful thought? 10 A. Yes. I would hope that we can avoid the problem. 11 Having foreseen the problem, and you've enunciated it 12 very well, it would be unfortunate if we fell into the 13 hole afterwards. 14 Q. Can I finally ask you, you've explained what the present 15 state of play is, just to what extent it was informed, 16 if at all, by first of all the ICO's report in 2006, 17 "What price privacy?", and then secondly I'm going to 18 ask about the phone hacking scandal. Have either of 19 those events influenced your thinking? 20 A. The "What price privacy?", as I said earlier, the 21 consideration -- the intention to bring private 22 investigation in goes back to the Act. The "What price 23 privacy?" had a positive impact in terms of trying to 24 move things forward and that commitment to make sure the 25 Section 55 offence was captured within the regime.</p> <p style="text-align: center;">Page 9</p>	<p>1 considered by the Inquiry team. In the main, the view 2 has been taken, and I am responsible for it, that it is 3 unnecessary to add to the evidence that otherwise we've 4 received. However, in this particular case, I've taken 5 the view that an exception is to be made. But I do want 6 to make it clear that by calling this additional 7 evidence, I do not intend any discourtesy to those from 8 whom we have not adduced further evidence. I'm grateful 9 to everybody for the assistance that they've provided 10 the Inquiry. 11 MR JAY: Thank you. Baroness Hollins, please. 12 BARONESS SHEILA CLARE HOLLINS (sworn) 13 Questions by MR JAY 14 MR JAY: Thank you. Please make yourself comfortable and 15 first of all your full name, Baroness Hollins. 16 A. It's Sheila Clare Hollins. 17 Q. Thank you very much. You provided us with a witness 18 statement dated 14 December of last year. You've signed 19 it and you have appended a statement of truth to it, so 20 this is your formal evidence to the Inquiry, 21 Baroness Hollins? 22 A. Yes, it is. 23 LORD JUSTICE LEVESON: Baroness Hollins, let me say to you 24 as I've said to others who have come to give evidence 25 about their own experiences that I'm grateful to you for</p> <p style="text-align: center;">Page 11</p>
<p>1 I have to say not just of course private investigations. 2 I licence other people for whom that would be a risk and 3 for whom I would want to bring that in for. 4 Insofar as the concerns of this Inquiry, hacking and 5 blagging, it really reinforces our thinking in the minds 6 of everybody, the need to get on with this. 7 MR BARR: Thank you. On that note, I'll finish. Thank you. 8 A. Thank you. 9 LORD JUSTICE LEVESON: I think that's a very appropriate 10 note to finish. Thank you very much indeed, Mr Butler. 11 A. Thank you, sir. 12 LORD JUSTICE LEVESON: Right. 13 MR JAY: I think we're ready to start with the next witness. 14 LORD JUSTICE LEVESON: Very good. 15 MR JAY: The next witness is Baroness Hollins, please. 16 LORD JUSTICE LEVESON: Thank you. I'm very conscious that 17 Baroness Hollins covers a part of the Inquiry which we 18 dealt with really last November, and I feel it's 19 appropriate just to say something about it before we 20 embark upon her evidence. 21 During the course of the Inquiry, a number of people 22 have come forward and provided an account which is 23 relevant to the terms of reference and chimes with the 24 concerns that have been enunciated by some of the 25 witnesses. Each one of these accounts has been</p> <p style="text-align: center;">Page 10</p>	<p>1 doing so, particularly conscious that you're going to be 2 talking about matters that are private and personal to 3 you, and there is some inconsistency in doing that in 4 a public setting, and I'm extremely conscious of the 5 inevitable concern, if not distress, that will cause. 6 So in those circumstances, I'm particularly grateful to 7 you for assisting me as you have. Thank you. 8 MR JAY: Baroness, you are a Doctor of Medicine, Member and 9 Fellow of the Royal College of Psychiatry, is that 10 right, and indeed past President of the Royal College of 11 Psychiatry. You are also Emeritus Professor in the 12 psychiatry of learning difficulties at St George's 13 Tooting, I believe; is that correct? 14 A. That's correct. 15 Q. President elect of the BMA, and you were made a life 16 peer in 2010. 17 A. Yes. 18 Q. You're independent, you don't hold a political whip, as 19 it were. 20 With that background, may I move straight, if I may, 21 to the terrible events of 20 April 2005, when your 22 daughter was the victim of an appalling knife attack. 23 A. Yes. 24 Q. I'm not going to go into the detail of that, but we're 25 concerned with press coverage. You provided us with</p> <p style="text-align: center;">Page 12</p>

<p>1 a selection of articles. Does that represent anything 2 other than the tip of the iceberg? 3 A. Oh, I mean it's just the tip of the iceberg. There 4 were -- the press coverage of my daughter's injury was 5 just everywhere, every day. She was on the -- her story 6 was on the News at Ten, for example, every night for 7 a month. When I travelled from one hospital to another 8 to see whether she could change hospitals, sitting on 9 the Underground, there were four different newspapers 10 across the way, all of them with the front page story 11 about my daughter. That was ten days after the attack. 12 This went on for months. And every time there was any 13 piece of news, it was always front page. And still 14 there is -- still quite recently there has still been 15 some press interest in her. 16 So we have a selection of articles, but we didn't 17 buy newspapers, we didn't collect articles about her. 18 The only articles we have in our store, a box of them, 19 are ones that people gave us, but we know that it was 20 just huge, the amount of coverage. And it was 21 incredibly intrusive. 22 Q. Yes. You make the point in your statement that the 23 press on the whole were kind in the sense of what they 24 printed. 25 A. Yes.</p> <p style="text-align: center;">Page 13</p>	<p>1 come with flowers, and the flowers were beautiful, but 2 that wasn't really the point. The point was that it was 3 the -- we had a big task. We had a little -- there was 4 a child to look after, there was somebody critically ill 5 to attend to, and everywhere we went, you know, we 6 arrived at the hospital, there would be photographers 7 outside. We had to find different ways out of the 8 hospital. 9 The police actually mounted a guard on each door of 10 the hospital ward to protect her privacy. As 11 volunteers. We had volunteer protection. It began 12 because they were -- they didn't know who had injured 13 her, and they were trying to make sure that she was 14 safe, but then it became safety from the journalists. 15 I mean, it was extraordinarily intrusive. 16 Or the example of sitting in the visitors' waiting 17 room, we didn't know of course whether other people 18 sitting there were not visitors but journalists, but 19 again flowers would arrive and we began to joke that 20 there must be bugs in the flowers on the table because 21 things that we talked about in the waiting room would 22 appear in the papers the next day. So we began going 23 out into the corridor and speaking on our phones in the 24 corridor when we had information to share, to try to 25 avoid whatever was going on in the waiting room.</p> <p style="text-align: center;">Page 15</p>
<p>1 Q. But your concern relates to the intrusive nature of the 2 coverage. You say in paragraph 6: 3 "It was incredibly stressful for us and came on top 4 of the extraordinary pressures resulting from my 5 daughter's injury." 6 A. Yes. 7 Q. Could you elaborate on that for us, please, the effect 8 on you of the intrusion and the nature of the intrusion? 9 A. Well, I mean, I gave some small examples there, but for 10 example, on the first day the police actually had to 11 order journalists out of the garden of my daughter's -- 12 where my daughter was living, and they were very upset 13 about being asked to move. But they were actually 14 camping in the garden of her house. 15 Or a journalist who arrived at my mother-in-law's 16 house, and she was terminally ill at the time, she lived 17 200 miles away, and she rang up to say that this 18 journalist had come and wouldn't leave until she gave 19 her a photograph of my daughter. Which photograph 20 should she give? She didn't know what to do. We asked 21 the journalist to leave and again had to resort to 22 calling the police to arrange for this journalist to 23 leave. 24 It's that sort of thing. Or, I mean, constantly 25 people arriving at the doorstep, and often they would</p> <p style="text-align: center;">Page 14</p>	<p>1 We couldn't trust anybody, and it began to form 2 a division amongst members of the family about how to 3 deal with it and in some ways it was more traumatic, if 4 you can believe it, than the experience of actually 5 attending to the real tragic event that had taken place. 6 Q. Were all the stories that were published about your 7 daughter factually correct? 8 A. No, they weren't. Not at all. I picked out a couple of 9 examples for you but there was a lot of fabrication. 10 I mean there is one example, which was of -- we were 11 building a house next door to my daughter. In fact, we 12 had started to build the house before she was injured, 13 and there was an aerial photograph of it and a sort of 14 plan of the house, and an article saying which room my 15 son-in-law was going to have as his study, which room my 16 grandson was going to have as his nursery, how it had 17 been designed, specifically after her injury with my 18 daughter's needs in mind, and so on. It was all 19 fabricated, the whole thing. The name of the cottage, 20 the rose bush that was going to be built and what it 21 symbolised. It was all made up. It was a very nice 22 story, but it wasn't true. And there were quite a lot 23 of stories like that. You know, again it's distressing 24 when a fabrication is made, which of course then people 25 believe.</p> <p style="text-align: center;">Page 16</p>

<p>1 The only good thing that came out of that was</p> <p>2 journalists would come to our house, thinking they were</p> <p>3 coming to my daughter's house, so she didn't get quite</p> <p>4 as many people knocking on her door. I could tell the</p> <p>5 journalists walking up the drive and go out and say,</p> <p>6 "Who do you write for?" because I knew that's what --</p> <p>7 and it was every day.</p> <p>8 Q. We'll come to that particular piece in a moment. Can</p> <p>9 I ask you another introductory question, as it were.</p> <p>10 Did you employ someone to help you try and manage the</p> <p>11 issue of press intrusion?</p> <p>12 A. We did. We -- to begin with, we had a number of people</p> <p>13 approach us offering to help us deal with the press, but</p> <p>14 their motivations seemed to be about getting the largest</p> <p>15 sum of money to sell her story, we were offered sums as</p> <p>16 large as, I don't know, £300,000, but we weren't</p> <p>17 interested in money and we actually felt that it was</p> <p>18 wrong to take money for something like this.</p> <p>19 What we were looking for was somebody who would help</p> <p>20 us to minimise the press coverage, and try to prevent</p> <p>21 some of the sort of competitive nature of it. So we</p> <p>22 employed somebody we paid a daily rate to to try to</p> <p>23 manage that, and her advice to us was to issue very</p> <p>24 short statements whenever there was something new, to</p> <p>25 try to anticipate what the press were going to be really</p> <p style="text-align: center;">Page 17</p>	<p>1 pregnant."</p> <p>2 The date of the article is 24 April 2005. The date</p> <p>3 of the attack, as I said, was 20 April 2005. Can you</p> <p>4 help us, please, was your daughter pregnant?</p> <p>5 A. She was. She didn't know she was pregnant. She was</p> <p>6 five weeks pregnant. And it came to light when she was</p> <p>7 admitted, because hospitals routinely do pregnancy tests</p> <p>8 on women who are admitted to hospital. So this was news</p> <p>9 to the family, and it was very intimate and very</p> <p>10 sensitive information, and there was no way that</p> <p>11 information should have been in the public domain, and</p> <p>12 we do not know how it got into the public domain.</p> <p>13 It's apparent from the story that they confirmed it</p> <p>14 with very close family, but I do not believe that that</p> <p>15 person would have informed, would have leaked this to</p> <p>16 the press. Somehow that information came out.</p> <p>17 So there are two issues. One was how on earth did</p> <p>18 they know, but the other one was what were they doing</p> <p>19 publicising something so personal and intimate? No</p> <p>20 woman tells the world that she's pregnant when she's</p> <p>21 five weeks pregnant, you know? That just felt very</p> <p>22 hard.</p> <p>23 Q. On my understanding, it's a breach of the code of</p> <p>24 practice, but that may be the least of it. It speaks</p> <p>25 for itself.</p> <p style="text-align: center;">Page 19</p>
<p>1 really interested in, but to issue it to the</p> <p>2 Press Association so that it was equally available to</p> <p>3 all newspapers, all the journalists at the same time,</p> <p>4 and to avoid the possibility that anybody could claim an</p> <p>5 exclusive.</p> <p>6 So that's what we did, and we asked the hospitals to</p> <p>7 respect that we were going to manage the press through</p> <p>8 our agent, and on the whole, I think that worked quite</p> <p>9 well. But it was an expense that we had to incur in</p> <p>10 order to be able to try to sort of have some control</p> <p>11 over what was being said.</p> <p>12 Q. Thank you. We're going to go through some of the</p> <p>13 articles which you provided to us. We've discussed</p> <p>14 these beforehand and the ones we're going to look at</p> <p>15 you've expressly agreed can be put on the Inquiry</p> <p>16 screen. There's one article, however, we're not going</p> <p>17 to look at. I'll make that clear.</p> <p>18 A. Yes.</p> <p>19 Q. The first one I'd like to deal with, because I'm going</p> <p>20 to address these in chronological order, is the one in</p> <p>21 the News of the World of 24 April 2005, which has our</p> <p>22 number 58822. Baroness Hollins, it's going to be under</p> <p>23 tab 9, I think, of the little bundle we prepared for</p> <p>24 you. It is on the screen, thank you.</p> <p>25 "Exclusive: New shock in Abi attack. Knife mum was</p> <p style="text-align: center;">Page 18</p>	<p>1 Can I just ask you, though, for the avoidance of</p> <p>2 doubt, we do see a photograph.</p> <p>3 A. Yes.</p> <p>4 Q. Was that a photograph which --</p> <p>5 A. I believe that photograph was the photograph -- when the</p> <p>6 news of her injury was first released, and this,</p> <p>7 remember, would have been the 21st, so the story was</p> <p>8 breaking the next day, because she was admitted to</p> <p>9 St George's quite late in the evening, although it had</p> <p>10 happened on the 20th in the afternoon, and so I think</p> <p>11 the -- but her father-in-law was asked for a photo, and</p> <p>12 this was by the police who said that it would help the</p> <p>13 police investigation, and so this photograph was issued</p> <p>14 by the family.</p> <p>15 Q. Thank you. Next in sequence --</p> <p>16 LORD JUSTICE LEVESON: Sorry, did you say the photograph was</p> <p>17 given to the police or issued generally?</p> <p>18 A. It was given to the police so that they could issue it,</p> <p>19 and I believe they gave it to the Press Association.</p> <p>20 MR JAY: Baroness Hollins, if you don't mind going back to</p> <p>21 tab 4, an article in the Evening Standard, 9 May 2005.</p> <p>22 Our number 58816. This is the death of your mother,</p> <p>23 I believe?</p> <p>24 A. Yes.</p> <p>25 Q. On 8 May. But reported in the Evening Standard on</p> <p style="text-align: center;">Page 20</p>

<p>1 9 May. Do you know how this information came out?</p> <p>2 A. No. I don't. I know that the police knew about it, but</p> <p>3 I do not know how it got into the public domain. After</p> <p>4 it did, we issued a statement, but we do not know how it</p> <p>5 got into the public domain.</p> <p>6 Q. The article itself says, halfway down:</p> <p>7 "In a statement issued by the hospital, the family</p> <p>8 said today Mrs Kelly's death had come as a 'great</p> <p>9 shock'."</p> <p>10 I've been asked to put to you by a core participant</p> <p>11 that what happened here is that the hospital announced</p> <p>12 the death on 9 May and that was accompanied by</p> <p>13 a statement from your family, which was released to the</p> <p>14 Press Association, and the Evening Standard, as it were,</p> <p>15 reacted to that statement. Might that be right?</p> <p>16 A. You see, I think -- this was the only article that</p> <p>17 I had, but my recollection was that we issued</p> <p>18 a statement in response to something already being in</p> <p>19 the public domain, so I'm not saying that -- so the</p> <p>20 Standard may well be right, but I think we issued</p> <p>21 a statement because it already was -- had got into the</p> <p>22 public domain, but I don't have that documentary</p> <p>23 evidence. But that was why we did it. I think</p> <p>24 otherwise we would have waited a few days. We probably</p> <p>25 would have issued a statement at some point, but you can</p> <p style="text-align: center;">Page 21</p>	<p>1 We can see that the bungalow was going to be called Hope</p> <p>2 Cottage; is that correct?</p> <p>3 A. No.</p> <p>4 Q. It was "designed with the aid of medical specialists to</p> <p>5 cater for paralysed Abigail's needs"; was that correct?</p> <p>6 A. No.</p> <p>7 Q. "The domed bungalow features numerous skylights that</p> <p>8 will flood the cottage with light on sunny days,</p> <p>9 a special request from Abigail."</p> <p>10 Is that correct?</p> <p>11 A. It does have lovely skylights and lots of sun, but it</p> <p>12 wasn't a special request of Abigail's, no.</p> <p>13 Q. Then the reference to the "rose garden and fruit trees</p> <p>14 will be planted near the bungalow", that's the second</p> <p>15 column. Was that correct information or not?</p> <p>16 A. As it happens, we do have some roses, but most gardens</p> <p>17 do, and no, it wasn't a special request of Abigail's,</p> <p>18 and this was my house.</p> <p>19 Q. It says "exclusive". Do you know where this information</p> <p>20 was derived from or is it your belief that it was</p> <p>21 entirely made up?</p> <p>22 A. I mean, I have no knowledge of where -- I mean, the</p> <p>23 pictures of the house are correct. The description of</p> <p>24 the house, you know, is interesting, but, you know, it's</p> <p>25 made up. I mean, there are -- it's full of assumptions.</p> <p style="text-align: center;">Page 23</p>
<p>1 imagine, we were very shocked by my mother's sudden and</p> <p>2 unexpected death.</p> <p>3 Q. What happened at her funeral? Anything relevant to our</p> <p>4 Inquiry?</p> <p>5 A. Yes. The police came and advised us that there were</p> <p>6 a lot of journalists waiting outside the church and that</p> <p>7 they thought it would be advisable if we have a police</p> <p>8 escort and were taken to a side door. They said they</p> <p>9 thought that some of the journalists believed that if</p> <p>10 they were there, my daughter might actually come to her</p> <p>11 grandmother's funeral. I mean, she was in intensive</p> <p>12 care, so it shows some lack of understanding as to</p> <p>13 actually what, you know, kind of injury my daughter had</p> <p>14 sustained, but the police said that they were going to</p> <p>15 do their best to keep journalists out of the church, so</p> <p>16 we were, in fact, escorted to a side door.</p> <p>17 Q. Thank you. The next article in sequence is one you've</p> <p>18 already referred to in your evidence. It's under tab 5</p> <p>19 and it's the piece in the Sun, 24 November 2005. I'm</p> <p>20 not quite sure whether it has a unique reference number.</p> <p>21 Yes, it's 58818. A Sun piece entitled "A house of</p> <p>22 hope".</p> <p>23 As you were telling us, there were a considerable</p> <p>24 amount of incorrect information in this, apart from the</p> <p>25 basic premise of the article being factually incorrect.</p> <p style="text-align: center;">Page 22</p>	<p>1 I've marked the article with "nos", there are several</p> <p>2 other nos in there. For example, a house for ourselves</p> <p>3 being built in the grounds and we've sold our house so</p> <p>4 we can look after our daughter, it's not actually true.</p> <p>5 We were already building this house. So there are just</p> <p>6 an awful lot of kind of assumptions that are being made</p> <p>7 there. I have no idea where this came from.</p> <p>8 Q. Thank you. Next is a piece in the Mail on 12 November</p> <p>9 2005. We're not going to look at this on the screen</p> <p>10 Baroness Hollins, because of certain information in it</p> <p>11 which had not entered the public domain, but I'm going</p> <p>12 to ask you to talk through it in a way which will not be</p> <p>13 intrusive, or overly intrusive, may I add that</p> <p>14 qualification. Can you tell us, please, your principal</p> <p>15 concerns about this article? It's under our tabs 6, 7</p> <p>16 and 8.</p> <p>17 A. Well, this was a two-page spread, and it was linking my</p> <p>18 daughter's injury with an injury which my son had</p> <p>19 sustained some years earlier, and the point about it is</p> <p>20 that my son is a vulnerable adult and he had been able</p> <p>21 to give evidence in court and as a consequence of giving</p> <p>22 evidence, the men who had injured him had had prison</p> <p>23 sentences. But his name, his photograph and the names</p> <p>24 of the men who injured him were all published there.</p> <p>25 There were many, many things in the article which</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 were untrue, but that information was correct, and 2 I think this article probably upset me more than any 3 other. One, because of the fantasy linking of his 4 assault with my daughter's assault, and the untruths, 5 but secondly because I felt that it put him, as 6 a vulnerable adult, at risk and exposed him to risk, 7 when actually we were less able to provide him with the 8 kind of support that he needs because we were attending 9 to our daughter's needs, and, you know, well, there were 10 just a lot of inaccuracies. Some of it written quite 11 nicely, makes a nice story, it's lots of sensationalism 12 in it, lots of people ready to -- you know, asked us 13 questions about it and believed what it said.</p> <p>14 I'll give you one example from within it, where it 15 talks about how, because of his experience, he was able 16 to provide my daughter with a lot of support, and that 17 he spent hours at her bedside and was a huge comfort to 18 her. Well, actually, the reality was that for him it 19 was maybe a three-hour journey by public transport, with 20 a support worker, okay? That took some negotiating, 21 because that, you know, would have meant extra hours for 22 his supporter to be with him to do that. Three hours 23 there, three hours back. He was quite stressed about 24 it. He didn't -- you know, he doesn't like visiting 25 hospitals. You know, it wasn't a great experience and</p> <p style="text-align: center;">Page 25</p>	<p>1 A. Yes. It was part of a pilgrimage, but it was arranged 2 in such a way that -- yes, it was a private trip and it 3 was arranged in such a way that the knowledge that she 4 was going to go on this trip was kept very quiet before 5 she went, and although she knew that when she got there, 6 that people would recognise her, the intention was that 7 she would be able to go and have a private pilgrimage, 8 a private retreat with her family, without the kind of 9 intrusion that had accompanied previous expeditions, and 10 it took a huge amount of organising just for her to be 11 able to go, because it does.</p> <p>12 The Sun, of course, had been incredibly supportive 13 when she was first injured, and they'd actually 14 encouraged their readers to write in with letters of 15 support, and I think probably there were something like 16 10,000 letters of support and cards of support and so on 17 which came, and so that had been, you know -- and they 18 felt very kind of warmly towards the generous support 19 that they'd had from the public.</p> <p>20 But on this occasion it appears that two people went 21 out to Lourdes and took these photographs of her 22 children and herself without their knowledge, without 23 their permission. They knew nothing of it until they 24 returned home, and it's a telephoto lens. This is not 25 a picture taken close up with their knowledge.</p> <p style="text-align: center;">Page 27</p>
<p>1 actually he saw much less of her than we would have 2 liked him to see, because of the difficulties of getting 3 him there.</p> <p>4 So, you know, it's perhaps a hoped-for outcome from 5 the point of view of the journalist trying to write 6 about it, but it's fantasy. But I particularly felt 7 upset because I felt vulnerable for him, because he is 8 a very vulnerable adult.</p> <p>9 Q. Yes. And there's a frankly, if I may say so, absurd 10 attempt to link the circumstances of your daughter's 11 assault with the circumstances of your son's, because 12 it's quite clear that there was absolutely none.</p> <p>13 A. Yes.</p> <p>14 Q. Thank you. The next one, Baroness Hollins, is the trip 15 to Lourdes in July of 2006, which was in the Sun on 16 31 July, at our tab 2, page 58814. Is this the front 17 page? I think it is, isn't it? Do we know? Yes, it 18 is.</p> <p>19 A. Yes, it is the front page.</p> <p>20 Q. And the piece continued on pages 4 and 5. We don't have 21 page 4, we only have page 5, but I think we're going to 22 see:</p> <p>23 "Abigail's miracle. Brave stab victim takes Lourdes 24 trip." 25 Was this a private trip?</p> <p style="text-align: center;">Page 26</p>	<p>1 Q. This is at page 58817 on the next page, isn't it? And 2 I understand that you have no objection to the 3 photographs being shown on screen, since the children 4 obviously are very much older now.</p> <p>5 A. Yes.</p> <p>6 Q. But to be clear, are these photographs taken at Lourdes?</p> <p>7 A. Yes. Oh yes, absolutely. And there's a photograph 8 there which shows -- there are other photographs as 9 well, but there's a photograph which shows not just my 10 daughter's children but also other children of friends, 11 and completely without their parents' permission or 12 knowledge.</p> <p>13 And there were also inaccuracies in the stories that 14 there were, including, for example, that I had been 15 there, and indeed it shows the gullibility of the 16 public, because people believe what they read in the 17 newspaper, and people would come up to me and say did 18 I have a good holiday in France and I would say 19 "I didn't go to France". "Oh yes, you have, you went to 20 Lourdes". "No, I've never been there in my life". 21 "Yes, you went with your daughter". "No, actually, 22 I have never been to Lourdes, I did not go with my 23 daughter. I know it said it in the papers, but please 24 don't believe what you read in the papers". 25 But that sort of thing would happen regularly, and</p> <p style="text-align: center;">Page 28</p>

<p>1 it's -- you know.</p> <p>2 Q. Thank you. The final article we're going to look at,</p> <p>3 Baroness Hollins, is under your tab 3. It's our</p> <p>4 page 58815. It's an article in the Sun, 24 April 2009.</p> <p>5 It might be 27 April 2009. It's not --</p> <p>6 LORD JUSTICE LEVESON: It is the 27th.</p> <p>7 MR JAY: Pardon me. Again the caption or the headline is:</p> <p>8 "My miracle. 4 years on, stab mum Abigail regains</p> <p>9 speech."</p> <p>10 First of all, was that accurate?</p> <p>11 A. No. No. She regained her speech when she was still in</p> <p>12 hospital in 2005, and indeed this had been reported in</p> <p>13 the newspapers in 2005. She had difficulty speaking</p> <p>14 until she came off her ventilator, because of the</p> <p>15 complexities of speaking when you're ventilated, but she</p> <p>16 actually regained her speech while she was still in</p> <p>17 hospital.</p> <p>18 Q. Thank you. Again, it's said to be an exclusive. Were</p> <p>19 any interviews given at that time?</p> <p>20 A. No. But what had happened was that she wrote a foreword</p> <p>21 for a book which was written by a friend about Lourdes,</p> <p>22 and in the foreword, after the -- what actually happened</p> <p>23 was the Daily Telegraph asked if they could reprint the</p> <p>24 foreword as an article, and after discussion, my</p> <p>25 daughter agreed that it could be reprinted in the Daily</p> <p style="text-align: center;">Page 29</p>	<p>1 reporters on an apparent rota, who appeared to be</p> <p>2 surveying your daughter's house entrance from a car</p> <p>3 parked 50 yards away for six hours a day for three or</p> <p>4 four weeks. And when approached, one journalist said he</p> <p>5 was doing nothing wrong, and the police had already</p> <p>6 inquired but they could not force him to move. Had you</p> <p>7 been in contact with the police over this at all, or</p> <p>8 your daughter?</p> <p>9 A. No. I don't believe anybody had contacted the police.</p> <p>10 The local police are very tentative, and it wasn't a car</p> <p>11 park, it was -- there's a side street, so it's a country</p> <p>12 area where we live and there's a side road which we walk</p> <p>13 down regularly to go to the common, and I mean I can</p> <p>14 tell you about the activity of the cars, because we</p> <p>15 walked past them and we were curious to know -- we were</p> <p>16 fairly sure they must be journalists, so we took care to</p> <p>17 see what evidence there was in the car, and they always</p> <p>18 had a laptop and there was always the Daily Mail on the</p> <p>19 back seat and on the front seat, and -- but it was not</p> <p>20 the same car every day.</p> <p>21 On one occasion, I decided, because the Press</p> <p>22 Complaints Commission had said -- and we believed that</p> <p>23 when she went out, that the car would follow. We hadn't</p> <p>24 realised it to begin with, but we believe that she was</p> <p>25 followed all the way to a friend's wedding very soon</p> <p style="text-align: center;">Page 31</p>
<p>1 Telegraph. And so some of what they're talking about in</p> <p>2 this article was actually, you know, drawing on that</p> <p>3 piece that she had written for the book. I think.</p> <p>4 It says there:</p> <p>5 "Since my spinal injury, I prayed to God for</p> <p>6 healing."</p> <p>7 Something like that.</p> <p>8 Q. Thank you. We see a little insert, the Sun original</p> <p>9 piece in 2005:</p> <p>10 "Boy, 2, sees mum butchered."</p> <p>11 Do you have any comment on that?</p> <p>12 A. I find that very upsetting. I mean, it's sensational,</p> <p>13 it's actually an inaccurate description of what happened</p> <p>14 to her, and I think it's unnecessary. I think I also</p> <p>15 feel -- I partly feel upset about the fact that this --</p> <p>16 this is available off the Internet, you know. I worry</p> <p>17 about what people, including her children, will access</p> <p>18 from the Internet in years to come of this kind of</p> <p>19 nature, and I just think it's unnecessary.</p> <p>20 Q. Thank you. Go back, please, to your witness statement</p> <p>21 in paragraph 10, which deals with the birth of</p> <p>22 a granddaughter for you, obviously a daughter for</p> <p>23 Abigail. I think her name was Rebecca; is that correct?</p> <p>24 A. Yes.</p> <p>25 Q. In 2010. You point out that there were two or three</p> <p style="text-align: center;">Page 30</p>	<p>1 after the baby was born, it was her first outing.</p> <p>2 And then there was a journalist who actually had to</p> <p>3 be asked to leave her son's school sports day. I mean,</p> <p>4 a school sports day, small children, a journalist,</p> <p>5 uninvited, incognito and trying to take photographs, was</p> <p>6 asked to leave and in fact did leave, but had apparently</p> <p>7 followed them there when they'd gone out.</p> <p>8 But we tried to take a photograph of one of the cars</p> <p>9 and the journalist, and the journalist became very angry</p> <p>10 with us and said, "Why are you taking a photograph? Do</p> <p>11 you want me to take a photograph of you?" and that's</p> <p>12 when he told us that he'd already been asked to move on</p> <p>13 by the police, and said that he was doing nothing wrong.</p> <p>14 My daughter started not going out during those</p> <p>15 hours.</p> <p>16 Q. Did you raise this issue with the PCC?</p> <p>17 A. I did. And they said to me that in order to take any</p> <p>18 action, they would need to know the name of the</p> <p>19 journalist and have evidence of anything that's been</p> <p>20 published. I don't know whether anything was published.</p> <p>21 Nothing was drawn to my attention.</p> <p>22 Q. Did you mention the Daily Mail to the PCC?</p> <p>23 A. I did.</p> <p>24 Q. I've been asked to put to you that the Daily Mail</p> <p>25 photographer was apparently discreetly positioned about</p> <p style="text-align: center;">Page 32</p>

<p>1 200 to 300 yards away from your daughter's house. Might 2 that be right?</p> <p>3 A. I should think it is probably about 200 yards. Less. 4 150, I would say. Probably 150. No, even less, maybe 5 100. No, I would say it was -- it's definitely -- he 6 was positioned in such a way that he could see anybody 7 coming in or out of the driveway, which we share with 8 our daughter, and I would say it's no more than 100 9 yards. If he was 300 yards away, he wouldn't have been 10 able to see the doorway, the entrance, because further 11 up this road is a hump, and if he was 200 yards away, he 12 would have been the other side of the hump and wouldn't 13 have seen anything.</p> <p>14 Q. Thank you. I'm also asked to make it clear to you that 15 no photographs were taken of your daughter Abigail with 16 Rebecca, I think because the implication might be that 17 photographs were taken of Abigail without Rebecca.</p> <p>18 A. I think that may be true, but I don't know, I don't have 19 records. I think -- I think that's probably true.</p> <p>20 Q. Can I just understand, the car which you say was 50 21 yards away, is that the car with the copies of the 22 Daily Mail or are we talking about a different car?</p> <p>23 A. No, it's the car with the -- I mean, I would have 24 thought it was more like 50 than 100, but it's certainly 25 not more than 100. I'm not very good on precise</p> <p style="text-align: center;">Page 33</p>	<p>1 that was one issue.</p> <p>2 The other thing that happened was they put it on the 3 front page, and to make it worse, it turned out that the 4 article they'd got, which must have been leaked somehow 5 from the original journal, was actually my first draft, 6 which I'd changed quite substantially, and so again 7 I felt quite -- and they wouldn't let me see the copy 8 that they were going to publish. It made me much firmer 9 about insisting on seeing anything before it's published 10 in future, and I've learnt quite a lot from that, so 11 yes.</p> <p>12 So they kept and published the two photographs and 13 they then promised that they would destroy them, which 14 they did not, and they reused one of them some time 15 later. I think it was in 2008. October 2008.</p> <p>16 And their response to using this photograph again, 17 when I pointed out to them that they said they'd 18 destroyed it, was to say they thought they'd destroyed 19 it, and they were very sorry, but could they please pay 20 a fee for its use. I pointed out to them that actually 21 paying a fee for something which had been used 22 dishonestly was not really the point and that we on no 23 account would accept a fee for any journalism about my 24 daughter, and in the event, they paid a donation to 25 a trust fund for her, but -- a small donation to a trust</p> <p style="text-align: center;">Page 35</p>
<p>1 distances, but they always parked in exactly the same 2 place, and each car we saw had copies of the Mail in the 3 back.</p> <p>4 Q. You've covered paragraphs 11 and 12. Can I ask you 5 about paragraph 15.</p> <p>6 A. Yes.</p> <p>7 Q. This was an article apparently in the Mail on Sunday, 8 indeed as you state. You make it clear that two 9 photographs were provided but there was an express 10 promise that only one would be used, but in the event, 11 both were used; is that correct?</p> <p>12 A. Yes. What happened was it was an article that I'd 13 written for a small circulation, weekly journal, which 14 somehow the Mail on Sunday obtained a copy of and 15 contacted me to ask if they could use it and asked for 16 a photograph, and after some discussion, essentially 17 they were saying to me that they were going to use it 18 whether I agreed or not, but it would be really nice if 19 there was a photograph, and they also said that it was 20 going to be towards the back of the paper.</p> <p>21 In the event, it was on the -- and I sent 22 a photograph, and they said that it was too grainy, 23 could I send another one, and they wouldn't be able to 24 use it. So I sent another one, and they then used both, 25 having promised that they would only use the one. So</p> <p style="text-align: center;">Page 34</p>	<p>1 fund for her, but that was quite upsetting too, that 2 somehow they thought that paying a fee would somehow 3 make it okay.</p> <p>4 Q. Have you made any complaint to the Press Complaints 5 Commission in relation to the matters which you've told 6 us about, Baroness Hollins?</p> <p>7 A. I rang them on two occasions. One occasion I've told 8 you about. The other occasion, I can't remember the 9 precise detail, but I formed the view that it was going 10 to be too difficult because what they seemed to be 11 interested in was my detailing one specific incident, 12 and the point is that our distress about press intrusion 13 was not about one particular incident, it was about 14 hundreds of incidents. It was about the whole -- well, 15 the culture of the press.</p> <p>16 Plus, you know, we've had -- we'd had quite enough 17 to do, and to find the time and energy to pursue 18 a complaint when we were actually struggling to cope 19 with new experiences at all levels, it didn't really 20 seem to us that it was going to be a fruitful avenue of, 21 you know, direction, basically. So no, we didn't.</p> <p>22 Q. Your evidence focuses on two organisations, 23 News International, Sun and News of the World, and 24 Associated, the Mail and Mail on Sunday. Did you ever 25 complain to either of those organisations about the</p> <p style="text-align: center;">Page 36</p>

<p>1 matters you've told us about?</p> <p>2 A. Well, I complained -- I didn't complain to the</p> <p>3 management, no. I complained to the -- one of the</p> <p>4 editors about the paragraph 15, and I had a</p> <p>5 correspondence with him about that, but no, I did not go</p> <p>6 to the management, although I know that the adviser that</p> <p>7 we were employing had certainly spoken to -- I believe</p> <p>8 had spoken to management about behaviour. But nothing</p> <p>9 had been taken up in terms of a complaint.</p> <p>10 I think we felt that the whole -- you know, that</p> <p>11 there wasn't any point complaining. It just didn't seem</p> <p>12 as if, you know, anything would change. So we were</p> <p>13 trying to cope with the experience, really, and to</p> <p>14 manage it as best we could ourselves, but no, we didn't</p> <p>15 pursue a complaint.</p> <p>16 MR JAY: Thank you very much. That's very clear and that</p> <p>17 covers all the questions I had for you. May I ask you</p> <p>18 this open question. Is there anything else you would</p> <p>19 like to say which I haven't expressly asked you?</p> <p>20 A. I think just that, and maybe I've managed to explain it,</p> <p>21 but, you know, the intrusion seemed really not to have</p> <p>22 any sensitivity to the fact that we were not in any way</p> <p>23 seeking publicity. My daughter was not a celebrity. We</p> <p>24 were dealing with something that was very difficult for</p> <p>25 everybody, for a lot of people to cope with, and here we</p> <p style="text-align: center;">Page 37</p>	<p>1 away with it, they would have spent the whole time</p> <p>2 trying to talk about her, rather than trying to talk</p> <p>3 about the very important issue that I was supposed to be</p> <p>4 representing my profession on. So we would negotiate.</p> <p>5 You know, if you're going to insist on mentioning my</p> <p>6 daughter, then there is only one photograph, it's the</p> <p>7 official photograph, and you can have 30 seconds, but</p> <p>8 that's it. And that would be negotiated. Because</p> <p>9 otherwise they would -- and it interfered with my</p> <p>10 ability to do this job.</p> <p>11 At one point I thought maybe I'm going to have to</p> <p>12 resign the position in order that somebody can actually</p> <p>13 represent the profession properly, because, you know,</p> <p>14 they are only interested in me as my daughter's mother,</p> <p>15 and I don't think that's right.</p> <p>16 LORD JUSTICE LEVESON: One moment.</p> <p>17 Can somebody tell me when the anti-harassment policy</p> <p>18 was introduced? The PCC scheme for preventive measures.</p> <p>19 MR JAY: It was certainly in Sir Christopher Meyer's</p> <p>20 permanent evolution speech of May 2003.</p> <p>21 LORD JUSTICE LEVESON: So before all this?</p> <p>22 MR JAY: Yes. But we can get chapter and verse.</p> <p>23 LORD JUSTICE LEVESON: There are a number of concerns which</p> <p>24 I unbundle from what you've said, and I'd like to be</p> <p>25 sure I've understood it.</p> <p style="text-align: center;">Page 39</p>
<p>1 had this intrusion into our lives and it felt like that</p> <p>2 intrusion was insensitive. It's not that some of the</p> <p>3 stories weren't kindly, but it felt -- and the way that</p> <p>4 people got those stories and then the fact that the</p> <p>5 stories weren't true, that was just such a burden on us</p> <p>6 and it caused quite a division within our family.</p> <p>7 We were together when it was about my daughter, but</p> <p>8 when it came to the press, it caused a lot of upset with</p> <p>9 people not knowing -- a lot of emotion caused by this</p> <p>10 kind of public exposure, which had an effect far wider</p> <p>11 than my daughter, who was injured, but on many different</p> <p>12 members of the family whose lives changed as a result of</p> <p>13 that, and often it was the press kind of window on our</p> <p>14 lives that just made it so hard.</p> <p>15 I don't think that's right. I think that we had</p> <p>16 more right to privacy than we were entitled to.</p> <p>17 I think the last point I would make was that I was</p> <p>18 trying to do a job at that time as President of the</p> <p>19 Royal College of Psychiatrists and the Royal College of</p> <p>20 Psychiatrists had to employ media advisers to try to</p> <p>21 manage -- because one of my jobs was to appear on the</p> <p>22 television or the radio to speak about issues that the</p> <p>23 college was concerned about. That was my role. We had</p> <p>24 to negotiate, because I would be introduced as my</p> <p>25 daughter's mother, and if they had been allowed to get</p> <p style="text-align: center;">Page 38</p>	<p>1 A. Okay.</p> <p>2 LORD JUSTICE LEVESON: The first is that you and your family</p> <p>3 became targets of press intrusion because of a terrible</p> <p>4 attack on your daughter.</p> <p>5 A. Yes.</p> <p>6 LORD JUSTICE LEVESON: The second is that requests to desist</p> <p>7 weren't heeded.</p> <p>8 A. No.</p> <p>9 LORD JUSTICE LEVESON: The third is that they were</p> <p>10 continued.</p> <p>11 A. Mm.</p> <p>12 LORD JUSTICE LEVESON: Not merely for days, but for very</p> <p>13 much longer.</p> <p>14 A. Mm-hm.</p> <p>15 LORD JUSTICE LEVESON: And the fourth is that there appeared</p> <p>16 to be no remedy, nothing you could do to bring it to a</p> <p>17 stop --</p> <p>18 A. Yes.</p> <p>19 LORD JUSTICE LEVESON: -- except by bartering away your</p> <p>20 privacy. And the example that you've just given at the</p> <p>21 very end is an example of that.</p> <p>22 A. Yes.</p> <p>23 LORD JUSTICE LEVESON: To some extent, of course, the</p> <p>24 terrible circumstances of the attack on your daughter</p> <p>25 fits with other incidents that have caught public</p> <p style="text-align: center;">Page 40</p>

<p>1 attention and one only needs to go back to the evidence 2 of other people in the Inquiry to see some other 3 examples. 4 A. Yes. 5 LORD JUSTICE LEVESON: But if you had input into how that 6 could be stopped, is there any suggestion that you would 7 make from your perspective -- and I'm not casting 8 responsibility that I have onto you. 9 A. No. 10 LORD JUSTICE LEVESON: But it's clearly something you've 11 thought about, and, for example, I noted you went 12 through those articles writing "no, no, no, no", so 13 pointing out your concern while making it clear the 14 articles were sympathetic, they weren't having a go at 15 you, they were just creating a story. 16 A. Yes. 17 LORD JUSTICE LEVESON: Is there anything that -- 18 A. Well, I -- I mean, I think that -- I mean one thing is 19 I think that plagiarism -- when I've said journalists 20 ought to quote their sources, people look horrified and 21 say it's something absolutely dear to journalism that 22 they must protect their sources but I think if you're 23 protecting your sources in order to cover up that 24 actually you don't have a source, that's not good 25 enough.</p> <p style="text-align: center;">Page 41</p>	<p>1 extrapolated, and I think this is a particular problem 2 in the Internet world, you know, the electronic world, 3 the digital world where everything can be just pulled 4 down and used again and repeated ad infinitum, and so 5 I think the responsibility to get it right the first 6 time is incredibly important. And what worries me is 7 that truth doesn't seem to be part of the code. 8 LORD JUSTICE LEVESON: It is, actually. I think accuracy is 9 a part of the code, but I can well understand you're far 10 too busy worrying about your daughter and your 11 grandchild and all the problems that that throws up to 12 be starting to -- 13 A. Well, if we picked up every fact that was wrong -- 14 LORD JUSTICE LEVESON: -- lick a pencil and start writing 15 complaints. 16 A. Exactly. That's one of the other issues. I mean, as 17 a person -- because, you know, we were newly recipients 18 of press intrusion, so we hadn't had experience of how 19 to manage it, or how do you behave when somebody 20 misquotes you? We didn't know any of this. We were 21 having to learn. But our priorities were somewhere 22 else, so -- 23 LORD JUSTICE LEVESON: Yes, one can add to the problems I've 24 identified the fact that you had sufficient concern that 25 you felt you had to spend your own money to employ</p> <p style="text-align: center;">Page 43</p>
<p>1 And if you're presenting inaccuracies, then somebody 2 ought to be able to go back to you and you should be 3 able to get an apology or a clarification. 4 But there's also the fact that people will -- once 5 something is on the Internet now, and it's been 6 published as fact by one paper, it's simply republished 7 by another paper. Maybe the words are changed, the 8 orders are changed around a little bit, but the same 9 facts emerge, and so we would see one story being 10 released as a so-called exclusive in one paper, and it 11 would be appearing in different guises for the next two 12 weeks in lots of different newspapers and women's 13 magazines and whatever, with the same facts being 14 repeated. 15 LORD JUSTICE LEVESON: Facts which weren't accurate in the 16 beginning. 17 A. Facts which weren't accurate anyway. So I think there's 18 a responsibility to tell the truth, okay, but you have 19 to be sure of your facts. 20 The second thing is I think if you've taken it from 21 another newspaper, then you should quote that source, 22 because the first source ought to be responsible for the 23 truth of it, and if the second one is going to quote 24 somebody else, then they should say where they've quoted 25 it from, because otherwise the untruths just get</p> <p style="text-align: center;">Page 42</p>	<p>1 somebody to advise you. 2 A. Yes. 3 LORD JUSTICE LEVESON: At a time when you have more than 4 enough on your plate. 5 A. Yes, and not enough money, because of course it's very 6 expensive going through a trauma like this. 7 LORD JUSTICE LEVESON: Yes I understand. 8 The other feature, which it's worth underlining, is 9 that what might have been less intrusive prior to the 10 Internet when traditionally today's newspaper is 11 tomorrow's fire lighter, it's now there forever. 12 A. Yes. 13 LORD JUSTICE LEVESON: And I think that's what you were 14 expressing a concern, if I pick it up, that your 15 grandson, as he gets bigger and starts to trawl, may 16 read inaccurate material which tells a false history, 17 but which is spurious in its potential accuracy. 18 A. Yes. 19 LORD JUSTICE LEVESON: He will read something that goes back 20 to the events, thinking, "That must be as it was", when 21 it never was. 22 A. Yes, that's right. 23 LORD JUSTICE LEVESON: Yes. 24 A. And I don't know how you control for, you know, the -- 25 I mean, people were concerned, and so -- I mean, people</p> <p style="text-align: center;">Page 44</p>

<p>1 wanted to know what was happening to her, but part of 2 that was that this -- you know, it had become a big 3 story, and I don't know what -- I don't know what you 4 can do in terms of regulation to prevent something being 5 of public interest, but of course some of the reason for 6 the public interest was because it was -- because of 7 exaggeration and inaccuracy and so on. 8 LORD JUSTICE LEVESON: Well, the story, the attack can be 9 public interest, but there is a line -- 10 A. Yes, of privacy. 11 LORD JUSTICE LEVESON: -- it seems to me, which goes beyond 12 that which is justified in the public interest into 13 intrusive breaches of privacy. 14 A. Yes. 15 LORD JUSTICE LEVESON: And I'm not necessarily using that 16 word in a technical sense; I'm speaking generally. It's 17 why I'm particularly grateful to you for coming to put 18 this account into the record of the Inquiry, because the 19 other accounts we've had, if you take Mr Jefferies, who 20 was accused of crime and then all sorts of stuff thrown 21 out about him; the McCanns, where there was an ongoing 22 story and a wish to engage, for understandable reasons, 23 to find their daughter, but on the other hand material 24 that was of an entirely different nature. Your account 25 is straightforward unlawful violence which has had an</p> <p style="text-align: center;">Page 45</p>	<p>1 that a sincere apology was given at the time. I'd like 2 to repeat it now, and a donation -- I accept that 3 Baroness Hollins will think that's not a sufficient 4 response, but a donation was made to the 5 Abigail Witchalls Trust and the apology was given 6 because there was a genuine mistake made in publishing 7 two photographs instead of one. 8 LORD JUSTICE LEVESON: Mr Caplan, thank you very much. 9 Baroness Hollins obviously hears that. Of course, my 10 concern is a slightly wider one. 11 Thank you very much indeed. 12 This is remarkably early, Mr Jay. Have we not got 13 anybody else that we can deal with now? No, don't. 14 That concludes this week. I'm grateful to core 15 participants for their agreement to add to their 16 submissions shortly in writing, because it will allow me 17 to deal with the matter, I hope, before the end of the 18 weekend, or at least so that I can decide the matter on 19 Monday. 20 Otherwise, I think it is 10 o'clock on Monday 21 morning. Thank you. 22 (3.18 pm) 23 (The hearing adjourned until 10 o'clock on Monday, 24 6 February 2012) 25</p> <p style="text-align: center;">Page 47</p>
<p>1 impact on everybody else, with nobody trying to hurt 2 you, nobody trying to be unpleasant or to have some dig, 3 perhaps for motives which are not to be criticised, but 4 going beyond what anybody could legitimately feel 5 appropriate. 6 A. Yes. 7 LORD JUSTICE LEVESON: And that's why I felt that I was very 8 keen for you to come and discuss it, and I'm extremely 9 grateful to you for doing so. Again, I'm sorry to put 10 you through reliving it. 11 A. It has been hard, I have to say, going back and 12 searching for newspaper articles and contemplating doing 13 this has not been easy. But I think the reason that 14 I did write to you in the end was because I thought that 15 what we would say was a little different to what had 16 been said already, and members of the family thought it 17 was important. 18 LORD JUSTICE LEVESON: Well, if it helps at all, I agree 19 with them. 20 A. Thank you. 21 LORD JUSTICE LEVESON: Thank you very much. 22 MR CAPLAN: Can I just repeat an apology that we made at the 23 time, if I may? It relates to the Mail on Sunday, and 24 Baroness Hollins has described how two photographs were 25 published instead of one, and I would just like to say</p> <p style="text-align: center;">Page 46</p>	

<p>D</p> <p>daily 17:22 29:23 29:25 31:18 32:22,24 33:22</p> <p>Data 3:11</p> <p>date 19:2,2</p> <p>dated 11:18</p> <p>daughter 12:22 13:11 14:12,19 16:7,11 19:4 22:10,13 24:4 25:16 28:21,23 29:25 30:22 31:8 32:14 33:8,15 35:24 37:23 38:7,11 39:6 40:4,24 43:10 45:23</p> <p>daughter's 13:4 14:5,11 16:18 17:3 24:18 25:4,9 26:10 28:10 31:2 33:1 38:25 39:14</p> <p>day 13:5 14:10 15:22 17:7 20:8 31:3,20 32:3,4</p> <p>days 13:11 21:24 23:8 40:12</p> <p>deal 16:3 17:13 18:19 47:13,17</p> <p>dealing 37:24</p> <p>deals 30:21</p> <p>dealt 3:20 10:18</p> <p>dear 41:21</p> <p>death 20:22 21:8 21:12 22:2</p> <p>December 11:18</p> <p>decide 47:18</p> <p>decided 31:21</p> <p>defence 6:14</p> <p>define 7:14,15</p> <p>defined 5:6 6:1,8</p> <p>defines 5:21</p> <p>definitely 33:5</p> <p>definition 7:3 8:16</p> <p>derived 23:20</p> <p>described 1:14 46:24</p> <p>description 23:23 30:13</p> <p>designated 4:20 5:6 6:8 9:6</p> <p>designating 6:6</p> <p>designed 6:17 16:17 23:4</p> <p>desire 6:20</p> <p>desist 40:6</p> <p>destroy 35:13</p> <p>destroyed 35:18 35:18</p> <p>detail 12:24 36:9</p> <p>detailing 36:11</p> <p>detective 5:14</p>	<p>6:16</p> <p>developed 1:22</p> <p>difference 3:4</p> <p>different 3:5,6 3:10 13:9 15:7 33:22 38:11 42:11,12 45:24 46:15</p> <p>differently 3:2</p> <p>difficult 36:10 37:24</p> <p>difficulties 12:12 26:2</p> <p>difficulty 6:24 29:13</p> <p>dig 46:2</p> <p>digital 43:3</p> <p>directing 2:9</p> <p>direction 36:21</p> <p>disappear 2:20</p> <p>discourtesy 11:7</p> <p>discreetly 32:25</p> <p>discuss 46:8</p> <p>discussed 18:13</p> <p>discussion 29:24 34:16</p> <p>dishonestly 35:22</p> <p>disposed 3:21</p> <p>dissimilar 1:17 1:24</p> <p>distances 34:1</p> <p>distress 12:5 36:12</p> <p>distressing 16:23</p> <p>division 16:2 38:6</p> <p>Doctor 12:8</p> <p>documentary 21:22</p> <p>doing 5:15,16 8:11,18,25 9:5 12:1,3 19:18 31:5 32:13 46:9,12</p> <p>domain 19:11,12 21:3,5,19,22 24:11</p> <p>domed 23:7</p> <p>donation 35:24 35:25 47:2,4</p> <p>door 1:17 15:9 16:11 17:4 22:8,16</p> <p>doorstep 14:25</p> <p>doorway 33:10</p> <p>doubt 6:19 8:19 20:2</p> <p>draft 35:5</p> <p>drawing 30:2</p> <p>drawn 32:21</p> <p>drive 17:5</p> <p>driveway 33:7</p> <hr/> <p>E</p> <p>earlier 1:14 9:20 24:19</p>	<p>early 47:12</p> <p>earth 19:17</p> <p>easy 46:13</p> <p>editors 37:4</p> <p>effect 14:7 38:10</p> <p>effective 7:20</p> <p>either 9:18 36:25</p> <p>elaborate 14:7</p> <p>elect 12:15</p> <p>electronic 43:2</p> <p>embark 10:20</p> <p>emerge 42:9</p> <p>Emeritus 12:11</p> <p>emotion 38:9</p> <p>employ 2:23 17:10 38:20 43:25</p> <p>employed 17:22</p> <p>employing 37:7</p> <p>encouraged 27:14</p> <p>energy 36:17</p> <p>engage 45:22</p> <p>enhancement 1:16</p> <p>ensure 1:12</p> <p>entered 24:11</p> <p>entirely 5:15,16 6:19 23:21 45:24</p> <p>entitled 22:21 38:16</p> <p>entrance 31:2 33:10</p> <p>enunciated 9:11 10:24</p> <p>equally 18:2</p> <p>escort 22:8</p> <p>escorted 22:16</p> <p>essentially 34:16</p> <p>evening 20:9,21 20:25 21:14</p> <p>event 16:5 34:10 34:21 35:24</p> <p>events 9:19 12:21 44:20</p> <p>everybody 10:6 11:9 37:25 46:1</p> <p>evidence 3:13 10:20 11:3,7,8 11:20,24 21:23 22:18 24:21,22 31:17 32:19 36:22 41:1</p> <p>evolution 39:20</p> <p>exactly 2:25 34:1 43:16</p> <p>exaggeration 45:7</p> <p>example 13:6 14:10 15:16 16:10 24:2 25:14 28:14 40:20,21 41:11</p> <p>examples 14:9 16:9 41:3</p>	<p>exception 11:5</p> <p>excluded 7:5,6,9</p> <p>exclusion 4:3,5 6:4,17</p> <p>exclusive 18:5,25 23:19 29:18 42:10</p> <p>exclusively 4:8 4:25 8:18 9:5</p> <p>expeditions 27:9</p> <p>expense 18:9</p> <p>expensive 44:6</p> <p>experience 16:4 25:15,25 37:13 43:18</p> <p>experiences 11:25 36:19</p> <p>expertise 6:6</p> <p>explain 37:20</p> <p>explained 9:14</p> <p>explanatory 4:24</p> <p>explore 4:14 8:6</p> <p>exploring 1:6</p> <p>exposed 25:6</p> <p>exposure 38:10</p> <p>express 34:9</p> <p>expressing 44:14</p> <p>expressly 18:15 37:19</p> <p>extent 9:15 40:23</p> <p>extra 25:21</p> <p>extraordinarily 15:15</p> <p>extraordinary 14:4</p> <p>extrapolated 43:1</p> <p>extremely 12:4 46:8</p> <hr/> <p>F</p> <p>fabricated 16:19</p> <p>fabrication 16:9 16:24</p> <p>fact 2:18 16:11 22:16 30:15 32:6 37:22 38:4 42:4,6 43:13,24</p> <p>facts 42:9,13,15 42:17,19</p> <p>factually 16:7 22:25</p> <p>fairly 31:16</p> <p>fairness 7:4</p> <p>fall 4:18 8:13</p> <p>false 44:16</p> <p>family 16:2 19:9 19:14 20:14 21:7,13 27:8 38:6,12 40:2 46:16</p> <p>fantasy 25:3 26:6</p> <p>far 3:18 38:10 43:9</p> <p>father-in-law 20:11</p>	<p>feature 44:8</p> <p>features 23:7</p> <p>February 47:24</p> <p>fee 35:20,21,23 36:2</p> <p>feel 4:22 10:18 30:15,15 46:4</p> <p>fell 8:15 9:12</p> <p>Fellow 12:9</p> <p>felt 17:17 19:21 25:5 26:6,7 27:18 35:7 37:10 38:1,3 43:25 46:7</p> <p>final 29:2</p> <p>finally 9:14</p> <p>find 15:7 30:12 36:17 45:23</p> <p>finding 6:23,24</p> <p>finish 10:7,10</p> <p>fire 44:11</p> <p>firmer 35:8</p> <p>first 4:15 9:16 11:15 14:10 18:19 20:6 27:13 29:10 32:1 35:5 40:2 42:22 43:5</p> <p>fit 2:19 3:5,6</p> <p>fits 40:25</p> <p>five 19:6,21</p> <p>flood 23:8</p> <p>flowers 15:1,1,19 15:20</p> <p>focuses 1:11 36:22</p> <p>follow 31:23</p> <p>followed 31:25 32:7</p> <p>force 8:14 31:6</p> <p>foreseen 9:11</p> <p>forever 44:11</p> <p>foreword 29:20 29:22,24</p> <p>form 5:2,4 9:7 16:1</p> <p>formal 4:1 11:20</p> <p>formally 3:17</p> <p>formed 36:9</p> <p>formulated 3:2</p> <p>forward 9:24 10:22</p> <p>four 13:9 31:4</p> <p>fourth 40:15</p> <p>framework 6:25</p> <p>France 28:18,19</p> <p>frankly 26:9</p> <p>freedom 5:3 7:17</p> <p>friend 29:21</p> <p>friends 28:10</p> <p>friend's 31:25</p> <p>front 13:10,13 26:16,19 31:19 35:3</p> <p>fruit 23:13</p> <p>fruitful 36:20</p> <p>full 11:15 23:25</p>	<p>fund 35:25 36:1</p> <p>funeral 22:3,11</p> <p>further 11:8 33:10</p> <p>future 1:6 6:1 35:10</p> <hr/> <p>G</p> <p>garden 14:11,14 23:13</p> <p>gardens 23:16</p> <p>generally 2:6,6 20:17 45:16</p> <p>generous 27:18</p> <p>genuine 47:6</p> <p>George's 12:12 20:9</p> <p>germane 3:24</p> <p>getting 17:14 26:2</p> <p>give 11:24 14:20 24:21 25:14</p> <p>given 20:17,18 29:19 40:20 47:1,5</p> <p>giving 24:21</p> <p>go 7:3 12:24 17:5 18:12 27:4,7 27:11 28:19,22 30:20 31:13 37:5 41:1,14 42:2</p> <p>God 30:5</p> <p>goes 9:22 44:19 45:11</p> <p>going 9:17 12:1 12:24 15:22,25 16:15,16,20 17:25 18:7,12 18:14,16,19,22 20:20 22:14 23:1 24:9,11 26:21 27:4 29:2 32:14 34:17,20 35:8 36:9,20 39:5 39:11 42:23 44:6 46:4,11</p> <p>good 2:14 3:16 7:8 10:14 17:1 28:18 33:25 41:24</p> <p>grainy 34:22</p> <p>grandchild 43:11</p> <p>granddaughter 30:22</p> <p>grandmother's 22:11</p> <p>grandson 16:16 44:15</p> <p>grateful 11:8,25 12:6 45:17 46:9 47:14</p> <p>great 21:8 25:25</p> <p>grounds 24:3</p> <p>guard 15:9</p>	<p>guidance 8:6</p> <p>guises 42:11</p> <p>gullibility 28:15</p> <hr/> <p>H</p> <p>hacking 9:18 10:4</p> <p>halfway 21:6</p> <p>hand 45:23</p> <p>happen 28:25</p> <p>happened 20:10 21:11 22:3 29:20,22 30:13 34:12 35:2</p> <p>happening 45:1</p> <p>happens 23:16</p> <p>hard 19:22 38:14 46:11</p> <p>headline 29:7</p> <p>healing 30:6</p> <p>hearing 47:23</p> <p>hears 47:9</p> <p>heart 2:18</p> <p>heeded 40:7</p> <p>help 5:25 7:22 17:10,13,19 19:4 20:12</p> <p>helps 46:18</p> <p>he'll 5:11</p> <p>history 44:16</p> <p>hold 12:18</p> <p>hole 9:13</p> <p>holiday 28:18</p> <p>Hollins 10:15,17 11:11,12,15,16 11:21,23 18:22 20:20 24:10 26:14 29:3 36:6 46:24 47:3,9</p> <p>home 27:24</p> <p>hope 9:10 22:22 23:1 47:17</p> <p>hoped-for 26:4</p> <p>horrified 41:20</p> <p>hospital 13:7 15:6,8,10 19:8 21:7,11 29:12 29:17</p> <p>hospitals 13:8 18:6 19:7 25:25</p> <p>hours 25:17,21 25:22,23 31:3 32:15</p> <p>house 14:14,16 16:11,12,14 17:2,3 22:21 23:18,23,24 24:2,3,5 31:2 33:1</p> <p>huge 13:20 25:17 27:10</p> <p>human 5:2 7:18</p> <p>hump 33:11,12</p> <p>hundreds 36:14</p> <p>hurt 46:1</p>
---	---	--	---	---	--	---

I	45:18	11:11,13,14	19:18,21 21:1	23:8	management	mother-in-law's
iceberg 13:2,3	insensitive 38:2	12:8 20:20	21:2,3,4 22:13	lighter 44:11	37:3,6,8	14:15
ICO's 9:16	insert 30:8	29:7 37:16	23:19,24,24	liked 26:2	marked 24:1	motivations
idea 3:16 24:7	inserted 7:19	39:19,22 47:12	25:9,12,21,24	line 45:9	Market 7:5	17:14
identified 43:24	insist 39:5	Jefferies 45:19	25:25 26:4,17	link 26:10	material 4:13	motives 46:3
ill 14:16 15:4	insisting 35:9	job 38:18 39:10	27:17 28:23	linking 24:17	44:16 45:23	mounted 15:9
imagine 22:1	Insofar 10:4	jobs 38:21	29:1 30:2,16	25:3	matter 2:22 4:17	move 9:24 12:20
impact 9:23 46:1	intend 11:7	joke 15:19	31:15 32:18,20	literary 4:12	9:8 47:17,18	14:13 31:6
implication	intensive 22:11	journal 34:13	33:18 36:16,21	little 15:3 18:23	matters 5:8 12:2	32:12
33:16	intention 9:21	35:5	37:6,10,12,21	30:8 42:8	36:5 37:1	Moving 3:10
important 7:2	27:6	journalism 4:6	39:5,13 43:2	46:15	McCanns 45:21	mum 18:25 29:8
39:3 43:6	interest 13:15	7:9 8:19 35:23	43:17,20 44:24	live 31:12	mean 13:3 14:9	30:10
46:17	45:5,6,9,12	41:21	44:24 45:1,2,3	lived 14:16	14:24 15:15	
inaccuracies	interested 5:14	journalist 4:16	45:3	lives 38:1,12,14	16:10 22:11	N
25:10 28:13	17:17 18:1	5:13 6:12,13	knowing 38:9	living 14:12	23:22,22,25	name 11:15
42:1	36:11 39:14	14:15,18,21,22	knowledge 23:22	local 31:10	30:12 31:13	16:19 24:23
inaccuracy 45:7	interesting 23:24	26:5 31:4 32:2	27:3,22,25	longer 40:13	32:3 33:23	30:23 32:18
inaccurate 30:13	interests 7:4	32:4,9,9,19	28:12	look 4:3,6 8:23	41:18,18 43:16	names 24:23
44:16	interfered 39:9	journalistic 4:12		15:4 18:14,17	44:25,25	narrows 5:1
incident 36:11	International	5:16 7:5	L	24:4,9 29:2	means 4:15,16	nature 3:6 14:1,8
36:13	36:23	journalists 5:12	lack 22:12	41:20	meant 25:21	17:21 30:19
incidents 36:14	Internet 30:16	6:20 8:4,11 9:5	laptop 31:18	looking 5:9	measures 39:18	45:24
40:25	30:18 42:5	14:11 15:14,18	large 2:15 17:16	17:19	media 38:20	near 23:14
including 28:14	43:2 44:10	17:2,5 18:3	largest 17:14	LORD 1:3 2:22	medical 23:4	necessarily
30:17	interviews 29:19	22:6,9,15	latches 8:10	3:1,9 5:10 6:11	Medicine 12:8	45:15
incognito 32:5	intimate 19:9,19	31:16 41:19	late 20:9	6:21,23 7:1,7	meet 2:13,23	necessary 6:15
incompatible	introduced	journey 25:19	law 4:17	7:10,24 10:9	Member 12:8	need 10:6 32:18
3:14	38:24 39:18	July 26:15,16	lawyers 7:6	10:12,14,16	members 16:2	needs 16:18 23:5
inconsistency	introductory	JUSTICE 1:3	leaked 19:15	11:23 20:16	38:12 46:16	25:8,9 41:1
12:3	17:9	2:22 3:1,9 5:10	35:4	29:6 39:16,21	men 24:22,24	negotiate 38:24
incorrect 22:24	intrusion 14:8,8	6:11,21,23 7:1	learn 43:21	39:23 40:2,6,9	mention 32:22	39:4
22:25	17:11 27:9	7:7,10,24 10:9	learning 12:12	40:12,15,19,23	mentioned 3:18	negotiated 39:8
incredibly 13:21	36:12 37:21	10:12,14,16	learnt 35:10	41:5,10,17	8:7	negotiating
14:3 27:12	38:1,2 40:3	11:23 20:16	leave 14:18,21	42:15 43:8,14	mentioning 39:5	25:20
43:6	43:18	29:6 39:16,21	14:23 32:3,6,6	43:23 44:3,7	merely 40:12	never 4:21,21
incur 18:9	intrusive 13:21	39:23 40:2,6,9	legislation 5:3	44:13,19,23	Meyer's 39:19	28:20,22 44:21
independent	14:1 15:15	40:12,15,19,23	6:3,5	45:8,11,15	micro 2:14	new 2:10 17:24
12:18	24:13,13 44:9	41:5,10,17	legitimately 46:4	46:7,18,21	miles 14:17	18:25 36:19
individual 1:12	45:13	42:15 43:8,14	length 3:22	47:8	mind 2:3,8 16:18	newly 43:17
2:16	investigating 2:7	43:23 44:3,7	lens 27:24	lot 1:9,10 16:9,22	20:20	news 13:6,13
individuals 1:8	investigation 9:5	44:13,19,23	letters 27:14,16	22:6 24:6	minds 10:5	18:21 19:8
1:16,18,23,24	9:22 20:13	45:8,11,15	Let's 4:6	25:10,16 35:10	minimal 8:25	20:6 36:23,23
industry 1:9	investigations	46:7,18,21	level 3:8	37:25 38:8,9	minimise 17:20	newspaper 5:15
inevitable 12:5	5:22 7:12,14	47:8	levels 36:19	lots 23:11 25:11	miracle 26:23	28:17 42:21
infinitum 43:4	7:21 8:9,9 10:1	justified 45:12	LEVESON 1:3	25:12 42:12	29:8	44:10 46:12
influenced 9:19	investigator 6:16		2:22 3:1,9 5:10	Lourdes 26:15	misbehaved 8:20	newspapers 13:9
information 3:25	8:8	K	6:11,21,23 7:1	26:23 27:21	misconduct 8:22	13:17 18:3
4:8,9 15:24	investigators	keen 7:25 46:8	7:7,10,24 10:9	28:6,20,22	misquotes 43:20	29:13 42:12
19:10,11,16	1:10 4:18	keep 22:15	10:12,14,16	29:21	mistake 47:6	nice 16:21 25:11
21:1 22:24	investigatory	Kelly's 21:8	11:23 20:16	lovely 23:11	Mm 40:11	34:18
23:15,19 24:10	8:11	kept 27:4 35:12	29:6 39:16,21	lunch 3:19 4:4	Mm-hm 40:14	nicely 25:11
25:1	investigator's	key 4:25	39:23 40:2,6,9	5:21	model 1:7	night 13:6
informed 9:15	8:8	kind 5:1 8:25	40:12,15,19,23	luncheon 1:5	moment 2:5 4:23	nos 24:1,2
19:15	issue 3:20 5:19	13:23 22:13	41:5,10,17		8:7 17:8 39:16	note 4:24 8:6
injured 15:12	7:17 8:25 9:4,6	24:6 25:8 27:8	42:15 43:8,14	M	Monday 47:19	10:7,10
16:12 24:22,24	17:11,23 18:1	27:18 30:18	43:23 44:3,7	magazines 42:13	47:20,23	noted 41:11
27:13 38:11	20:18 32:16	38:10,13	44:13,19,23	Mail 24:8 31:18	money 17:15,17	November 10:18
injury 13:4 14:5	35:1 39:3	kindly 38:3	45:8,11,15	32:22,24 33:22	17:18 43:25	22:19 24:8
16:17 20:6	issued 20:13,17	knew 17:6 21:2	46:7,18,21	34:2,7,14	44:5	number 3:24
22:13 24:18,18	21:4,7,17,20	27:5,23	47:8	36:24,24 46:23	month 13:7	10:21 17:12
30:5	21:25	knife 12:22	licence 3:23 8:24	main 11:1	months 13:12	18:22 20:22
input 41:5	issues 2:17 3:5	18:25	10:2	making 7:19	moot 4:20	22:20 39:23
inquired 31:6	7:18 19:17	knocking 17:4	licensed 5:13	41:13	morning 2:2	numerous 23:7
Inquiry 5:9 10:4	38:22 43:16	know 3:25 13:19	6:13 8:17 9:1,3	manage 17:10,23	47:21	nursery 16:16
10:17,21 11:1		14:20 15:5,12	lick 43:14	18:7 37:14	mother 20:22	
11:10,20 18:15	J	15:17 16:23	life 12:15 28:20	38:21 43:19	38:25 39:14	O
22:4 41:2	Jay 10:13,15	17:16 19:5,12	light 7:2 19:6	managed 37:20	mother's 22:1	objection 28:2

obtained 34:14	10:17 27:1	picture 27:25	13:23 17:11,13	38:10 40:25	Rebecca 30:23	23:17
obtaining 4:8	43:7,9 45:1	pictures 23:23	17:20,25 18:2	45:5,6,9,12	33:16,17	requests 40:6
obviously 28:4	participant	piece 13:13 17:8	18:7 19:16	publication 4:11	received 11:4	required 1:15
30:22 47:9	21:10	22:19,21 24:8	20:19 21:14	publicising	recipients 43:17	3:3,3 8:16
occasion 27:20	participants	26:20 30:3,9	31:21 36:4,12	19:19	recognise 1:22	requires 9:8
31:21 36:7,8	47:15	pilgrimage 27:1	36:15 38:8,13	publicity 37:23	27:6	research 7:6
occasions 3:24	particular 1:6	27:7	40:3 43:18	publish 35:8	recollection	resign 39:12
36:7	5:15 9:8 11:4	place 2:16 16:5	pressures 14:4	published 16:6	21:17	resort 14:21
October 35:15	17:8 36:13	34:2	prevent 17:20	24:24 32:20,20	record 45:18	respect 7:16 18:7
offence 9:25	43:1	plagiarism 41:19	45:4	35:9,12 42:6	records 33:19	response 21:18
offered 17:15	particularly 5:8	plan 16:14	preventive 39:18	46:25	redefine 6:3	35:16 47:4
offering 17:13	12:1,6 26:6	planted 23:14	previous 27:9	publishing 47:6	reemerge 2:2	responsibility
official 39:7	45:17	plate 44:4	price 9:17,20,22	pulled 43:3	reference 4:13	41:8 42:18
Oh 13:3 28:7,19	partly 5:20 30:15	play 9:15	principal 24:14	purpose 4:8 6:18	10:23 22:20	43:5
okay 25:20 36:3	passage 5:23	please 10:15	printed 13:24	purposes 4:10	23:13	responsible 11:2
40:1 42:18	passionate 4:1	11:11,14 14:7	prior 44:9	5:17 8:18	referred 2:1	42:22
older 28:4	pay 35:19	19:4 24:14	priorities 43:21	pursue 36:17	22:18	result 38:12
omitted 8:1	paying 35:21	28:23 30:20	prison 24:22	37:15	reflected 6:9	resulting 14:4
once 42:4	36:2	35:19	privacy 9:17,20	put 1:8 18:15	reflects 5:20	retreat 27:8
ones 13:19 18:14	PCC 32:16,22	Plus 36:16	9:23 15:10	21:10 25:5	regained 29:11	returned 27:24
one-man 1:11,13	39:18	pm 1:2 47:22	38:16 40:20	32:24 35:2	29:16	reused 35:14
2:23 3:4	peer 12:16	point 4:20 13:22	45:10,13	45:17 46:9	regains 29:8	right 6:11 10:12
ongoing 45:21	pencil 43:14	15:2,2 21:25	private 1:10 2:6		regime 3:18,20	12:10 21:15,20
open 37:18	people 10:2,21	24:19 26:5	2:7 4:18 5:14	Q	6:25 8:13,20	33:2 38:15,16
operating 2:9	13:19 14:25	30:25 35:22	5:22 7:11,14	qualification	9:25	39:15 43:5
order 3:6 14:11	15:17 16:24	36:12 37:11	7:21 8:8,8,11	24:14	regularly 28:25	44:22
18:10,20 32:17	17:4,12 25:12	38:17 39:11	9:5,21 10:1	question 8:24	31:13	rights 5:3 7:18
39:12 41:23	27:6,20 28:16	pointed 35:17,20	12:2 26:25	17:9 37:18	regulate 6:20	risk 10:2 25:6,6
orders 42:8	28:17 30:17	pointing 41:13	27:2,7,8	questions 5:20	regulation 1:13	road 31:12 33:11
organisations	37:25 38:4,9	police 14:10,22	probably 21:24	7:13 11:13	4:17 7:20 45:4	role 38:23
36:22,25	41:2,20 42:4	15:9 20:12,13	25:2 27:15	25:13 37:17	regulator 2:21	room 15:17,21
organising 27:10	44:25,25	20:17,18 21:2	33:3,4,19	quiet 27:4	reinforces 10:5	15:25 16:14,15
original 30:8	perfectly 7:8	22:5,7,14 31:5	problem 2:5 9:10	quite 1:22 13:14	related 7:21	rose 16:20 23:13
35:5	permanent	31:7,9,10	9:11 43:1	16:22 17:3	relates 4:10 14:1	roses 23:16
ought 7:4 41:20	39:20	32:13	problems 43:11	18:8 20:9	46:23	rota 31:1
42:2,22	permission	policed 2:21	43:23	22:20 25:10,23	relation 4:5 8:4	routinely 19:7
outcome 26:4	27:23 28:11	policy 39:17	profession 39:4	26:12 35:6,7	36:5	Royal 12:9,10
outing 32:1	person 8:12,13	political 12:18	39:13	35:10 36:1,16	released 20:6	38:19,19
outside 15:7 22:6	9:4 19:15	populated 1:18	Professor 12:11	38:6	21:13 42:10	run 2:14
overly 24:13	43:17	position 5:12	promise 34:10	quote 41:20	relevant 10:23	
o'clock 47:20,23	personal 12:2	6:10 8:4,7	promised 34:25	42:21,23	22:3	S
	19:19	39:12	35:13	quoted 42:24	relying 46:10	safe 15:14
P	perspective 41:7	positioned 32:25	proper 1:12 2:19		remain 2:20	safety 15:14
page 4:2 13:10	phone 9:18	33:6	3:5,7	R	remarkably	saw 26:1 34:2
13:13 26:16,17	phones 15:23	positive 9:23	properly 39:13	radio 38:22	47:12	saying 16:14
26:19,21,21	photo 20:11	possibilities 1:6	proposals 1:21	raise 32:16	remedy 40:16	21:19 34:17
28:1,1 29:4	photograph	possibility 18:4	proposed 3:13	rang 14:17 36:7	remember 20:7	says 4:6 5:14
35:3	14:19,19 16:13	possible 6:2,4	protect 15:10	rate 17:22	36:8	21:6 23:19
pages 26:20	20:2,4,5,5,13	potential 6:13	41:22	reacted 21:15	remembering	30:4
paid 17:22 35:24	20:16 24:23	44:17	protecting 41:23	read 28:16,24	8:9	scandal 9:18
paper 34:20 42:6	28:7,9 32:8,10	practice 6:9	protection 1:19	44:16,19	remit 4:19	scheme 2:13
42:7,10	32:11 34:16,19	19:24	3:11 15:11	readers 27:14	repeat 46:22	39:18
papers 15:22	34:22 35:16	prayed 30:5	provide 4:5 8:2,2	ready 10:13	47:2	school 32:3,4
28:23,24	39:6,7	precise 33:25	25:7,16	25:12	repeated 42:14	screen 18:16,24
paragraph 4:3,7	photographer	36:9	provided 10:22	real 9:4 16:5	43:4	24:9 28:3
4:23 5:21 14:2	32:25	pregnancy 19:7	11:9,17 12:25	realised 31:24	report 9:16	searching 46:12
30:21 34:5	photographers	pregnant 19:1,4	18:13 34:9	reality 25:18	reported 20:25	seat 31:19,19
37:4	15:6	19:5,6,20,21	PSIA 4:4 5:7	really 4:22 10:5	29:12	second 23:14
paragraphs 34:4	photographs	premise 22:25	Psychiatrists	10:18 15:2	reporters 31:1	40:6 42:20,23
paralysed 23:5	27:21 28:3,6,8	prepared 6:25	38:19,20	17:25 18:1	represent 13:1	secondary 6:2,5
parameters 5:1	32:5 33:15,17	18:23	psychiatry 12:9	34:18 35:22	39:13	secondly 9:17
Pardon 29:7	34:9 35:12	present 9:14	12:11,12	36:19 37:13,21	representing	25:5
parents 28:11	46:24 47:7	presenting 42:1	public 4:11,12	reappear 2:8,10	39:4	seconds 39:7
park 31:11	phrased 5:22	President 12:10	12:4 19:11,12	reason 45:5	reprint 29:23	section 3:10 4:11
parked 31:3 34:1	pick 8:21 44:14	12:15 38:18	21:3,5,19,22	46:13	reprinted 29:25	4:20 6:14 8:20
part 1:14 5:23	picked 5:2 16:8	press 5:3 7:18,22	24:11 25:19	reasons 1:14 7:8	republished 42:6	9:25
8:15,15,17 9:2	43:13	12:25 13:4,15	27:19 28:16	45:22	request 23:9,12	sector 1:18,20

2:7	son 24:18,20	straightforward	talk 24:12 39:2,2	44:20	U	25:25 31:10
sectors 1:17	son's 26:11 32:3	45:25	talked 15:21	third 40:9	unbundle 39:24	37:11
security 2:6	son-in-law 16:15	street 31:11	talking 12:2 30:1	thought 9:9 22:7	Underground	way 1:24 3:15,17
see 8:12 13:8	soon 31:25	stressed 25:23	33:22	22:9 33:24	13:9	6:8,16 13:10
20:2 21:16	sorry 20:16	stressful 14:3	talks 25:15	35:18 36:2	underlining 44:8	19:10 24:12
23:1 26:2,22	35:19 46:9	struggling 36:18	targets 40:3	39:11 41:11	understand 3:12	27:2,3 31:25
30:8 31:17	sort 7:21 8:12,22	study 16:15	task 15:3	46:14,16	28:2 33:20	33:6 37:22
33:6,10 35:7	14:24 16:13	stuff 45:20	team 11:1	three 25:22,23	43:9 44:7	38:3
41:2 42:9	17:21 18:10	subject 4:17	technical 45:16	30:25 31:3	understandable	ways 15:7 16:3
seeing 35:9	28:25	submissions	Telegraph 29:23	three-hour 25:19	45:22	wedding 31:25
seeking 37:23	sorts 45:20	47:16	30:1	thrown 45:20	understanding	week 47:14
seen 33:13	source 41:24	subsequently	telephoto 27:24	throws 43:11	4:14,15 19:23	weekend 47:18
sees 30:10	42:21,22	8:21	television 38:22	time 3:22 13:12	22:12	weekly 34:13
selection 13:1,16	sources 41:20,22	substantially	tell 17:4 24:14	14:16 18:3	understood 7:24	weeks 19:6,21
self-employed	41:23	35:6	31:14 39:17	29:19 35:14	39:25	31:4 42:12
1:9,13,18,23	so-called 42:10	sudden 22:1	42:18	36:17 38:18	unexpected 22:2	went 13:12 15:5
sell 6:25 17:15	speak 38:22	sufficient 43:24	telling 22:23	39:1 43:6 44:3	unfortunate 9:12	27:5,20 28:19
send 34:23	speaking 15:23	47:3	tells 19:20 44:16	46:23 47:1	uninvited 32:5	28:21 31:23
sensational	29:13,15 45:16	suggestion 41:6	ten 13:6,11	tip 13:2,3	unique 22:20	41:11
30:12	speaks 19:24	sum 17:15	tentative 31:10	today 21:8	unlawful 45:25	weren't 16:8
sensationalism	special 23:9,12	sums 17:15	terminally 14:16	today's 44:10	unnecessary	17:16 38:3,5
25:11	23:17	sun 22:19,21	terms 3:21 4:1	told 32:12 36:5,7	11:3 30:14,19	40:7 41:14
sense 13:23	specialists 23:4	23:11 26:15	5:3 9:23 10:23	37:1	unpleasant 46:2	42:15,17
45:16	specific 36:11	27:12 29:4	37:9 45:4	tolerate 2:5	untrue 25:1	We'll 17:8
sensitive 19:10	specifically	30:8 36:23	terrible 12:21	tomorrow's	untruths 25:4	we're 10:13
sensitivity 37:22	16:17	Sunday 34:7,14	40:3,24	44:11	42:25	12:24 18:12,14
sent 34:21,24	speech 29:9,11	36:24 46:23	test 2:20	Tooting 12:13	upset 14:12 25:2	18:16 24:9
sentence 3:12	29:16 39:20	sunny 23:8	tested 4:22	top 14:3	26:7 30:15	26:21 29:2
sentences 24:23	spend 43:25	supervision 1:17	tests 19:7	topic 3:10	38:8	we've 4:23 11:3
sequence 20:15	spent 25:17 39:1	support 25:8,16	thank 1:4 8:3	touched 4:4 5:24	upsetting 30:12	18:13 24:3
22:17	spinal 30:5	25:20 27:15,16	10:7,7,8,10,11	traditionally	36:1	36:16 45:19
seriousness 3:21	spoken 3:24 37:7	27:16,18	10:16 11:11,14	44:10	use 4:9,9 6:2	whip 12:18
set 4:23	37:8	supporter 25:22	11:17 12:7	tragic 16:5	34:15,17,24,25	wholly 8:18
setting 12:4	sports 32:3,4	supportive 27:12	18:12,24 20:15	transport 25:19	35:20	wider 38:10
share 15:24 33:7	spread 24:17	supposed 39:3	22:17 24:8	trauma 44:6		47:10
Sheila 11:12,16	spurious 44:17	supposes 1:10	26:14 29:2,18	traumatic 16:3	V	window 38:13
shock 18:25 21:9	St 12:12 20:9	sure 5:11 6:11,21	30:8,20 33:14	travelled 13:7	ventilated 29:15	wish 2:4 45:22
shocked 22:1	stab 26:23 29:8	7:14,19 9:24	37:16 46:20,21	trawl 44:15	ventilator 29:14	Witchalls 47:5
short 17:24	standard 5:4	15:13 22:20	47:8,11,21	treated 3:19	verse 39:22	witness 10:13,15
shortly 47:16	20:21,25 21:14	31:16 39:25	they'd 27:13,19	trees 23:13	victim 12:22	11:17 30:20
shown 28:3	42:19	42:19	32:7 35:4,17	tried 32:8	26:23	witnesses 10:25
shows 22:12 28:8	standards 1:15	surveying 31:2	35:18	trip 26:14,24,25	view 3:15,17 4:1	woman 19:20
28:9,15	2:14	suspect 6:3	thing 7:9 14:24	27:2,4	4:9 11:1,5 26:5	women 19:8
SIA 3:14 4:18	start 10:13 43:14	sustained 22:14	16:19 17:1	trouble 6:23	36:9	women's 42:12
SIA's 3:12	started 16:12	24:19	28:25 35:2	true 5:5 16:22	violence 45:25	word 4:25 45:16
side 22:8,16	32:14	sworn 11:12	41:18 42:20	24:4 33:18,19	visiting 25:24	wording 8:5
31:11,12 33:12	starting 43:12	symbolised	things 5:25 9:24	38:5	visitors 15:16,18	words 5:2,4 42:7
signed 11:18	starts 44:15	16:21	15:21 24:25	trust 16:1 35:25	volunteer 15:11	work 4:13 8:12
simply 42:6	state 9:15 34:8	sympathetic	think 2:1 4:25	35:25 47:5	volunteers 15:11	8:15,15,17
sincere 47:1	statement 4:2	41:14	5:5,19 6:7,25	truth 11:19	vulnerable 24:20	worked 18:8
sir 1:4 5:18	11:18,19 13:22	system 1:11	7:2,13,18,22	42:18,23 43:7	25:6 26:7,8	worker 25:20
10:11 39:19	21:4,7,13,15	systems 3:2	8:1 10:9,13	try 15:24 17:10		working 6:7 8:10
sitting 13:8	21:18,21,25		18:8,23 20:10	17:20,22,25	W	works 9:4
15:16,18	30:20	T	21:16,20,23	18:10 38:20	waited 21:24	world 18:21
six 31:3	statements 17:24	tab 18:23 20:21	25:2 26:17,21	trying 7:10 9:23	waiting 15:16,21	19:20 36:23
skylights 23:7,11	statute 8:10	22:18 26:16	27:15 30:3,14	15:13 26:5	15:25 22:6	43:2,2,3
slightly 3:1 5:1	stop 40:17	29:3	30:14,19,23	32:5 37:13	walk 31:12	worries 43:6
47:10	stopped 41:6	table 15:20	33:3,16,18,19	38:18 39:2,2	walked 31:15	worry 30:16
small 1:19 2:12	store 13:18	tabs 24:15	33:19 35:15	46:1,2	walking 17:5	worrying 43:10
9:2 14:9 32:4	stories 16:6,23	take 17:18 32:5,8	37:10,20 38:15	turn 4:2	want 6:7,12 10:3	worse 35:3
34:13 35:25	28:13 38:3,4,5	32:11,17 45:19	38:15,17 39:15	turned 35:3	11:5 32:11	worth 44:8
sold 24:3	story 13:5,10	taken 11:2,4	41:18,19,22	two 7:13 19:17	wanted 45:1	wouldn't 2:6
somebody 3:19	16:22 17:15	16:5 22:8	42:17,20 43:1	27:20 30:25	ward 15:10	14:18 33:9,12
3:23 6:24 15:4	19:13 20:7	27:25 28:6	43:5,8 44:13	34:8 35:12	warmly 27:18	34:23 35:7
17:19,22 39:12	25:11 41:15	33:15,17 37:9	46:13 47:3,20	36:7,22 42:11	wasn't 6:17 15:2	write 17:6 26:5
39:17 42:1,24	42:9 45:3,8,22	42:20	thinking 9:19	46:24 47:7	16:22 23:12,17	27:14 46:14
43:19 44:1	straight 12:20	takes 26:23	10:5 17:2	two-page 24:17		writing 41:12

43:14 47:16 written 25:10 29:21 30:3 34:13 wrong 17:18 31:5 32:13 43:13 wrote 29:20	50 31:3 33:20,24 55 3:10 6:14 9:25 58814 26:16 58815 29:4 58816 20:22 58817 28:1 58818 22:21 58822 18:22				
Y	6				
yards 31:3 33:1 33:3,9,9,11,21 year 11:18 years 24:19 29:8 30:18	6 14:2 24:15 47:24				
1	7				
10 30:21 47:20 47:23 10,000 27:16 100 33:5,8,24,25 11 34:4 12 24:8 34:4 14 11:18 15 34:5 37:4 150 2:23 33:4,4	7 24:15				
2	8				
2 26:16 30:10 2.00 1:2 20 12:21 19:3 20th 20:10 200 14:17 33:1,3 33:11 2001 5:23 6:10 2003 39:20 2005 12:21 18:21 19:2,3 20:21 22:19 24:9 29:12,13 30:9 2006 9:16 26:15 2008 35:15,15 2009 29:4,5 2010 12:16 30:25 2012 47:24 21st 20:7 24 4:3 18:21 19:2 22:19 29:4 25 4:23 27 29:5 27th 29:6	8 4:2 20:25 24:16				
3	9				
3 29:3 3.18 47:22 30 39:7 300 33:1,9 300,000 17:16 31 26:16	9 18:23 20:21 21:1,12				
4					
4 5:21 20:21 26:20,21 29:8					
5					
5 22:18 26:20,21					