

<p>1 2 (2.00 pm) 3 LORD JUSTICE LEVESON: Yes. 4 MR JAY: Lord Black, may we look at the draft regulations, 5 please, before we go back to your witness statement. 6 These are under tab 6 of the bundle which has been 7 prepared. 8 LORD JUSTICE LEVESON: Thank you. 9 MR JAY: It's our page 00052. If you look at the opening 10 three regulations, the remit of the regulator: 11 "The regulator shall regulate the following material 12 published by the regulated entities, subject to the 13 exceptions ..." 14 And you define the material as editorial content in 15 various places, whether it be printed or electronic 16 services and then there are various exceptions. In 3: 17 "Regulator shall not deal with ..." 18 3.3, for example, concerns about matters of taste, 19 decency and due impartiality. 20 Would you agree that one could have, in principle 21 and in practice, secondary legislation which precisely 22 reflected these regulations? 23 A. I dare say in any set of regulations you could have 24 a parallel set of regulations which were based in 25 statute. That's the nature of obligations on Page 1</p>	<p>1 are straightforward and simple, the publisher should 2 short them out. 3 I think there is also -- there would be a view in 4 here that, of course, there may be circumstances where 5 an individual -- perhaps his or her relationship with 6 a particular newspaper had broken down to such an extent 7 that that wasn't possible. Obviously in those 8 circumstances, the complaints arm of the regulator would 9 take over right at the start. This is just intended to 10 be a statement of the norm. 11 Q. Thank you. Regulation 25, this deals with when 12 a standards investigation is triggered. We saw three 13 categories in your witness statement. There are four 14 categories here but that doesn't matter. It's the 15 definition of "systemic failure" in 25.1 of page 00056: 16 where it appears that there has been one or more 17 significant or serial or widespread breaches of the 18 Editors' Code or ethical standards which indicate 19 a systemic or serious failure at one or more regulated 20 entities. 21 So "systemic failure" includes serious failure, 22 doesn't it? 23 A. As we discussed earlier, there could be examples where 24 one single complaint had made clear that the governance 25 within a newspaper had broken down to such an extent Page 3</p>
<p>1 a publisher. So it would be impossible to disagree with 2 that assertion. The question is why you would do it. 3 Q. Mm. Then in regulation 8 -- it may be we've covered 4 this to some extent already -- complaints and mediation. 5 This our page 00053. In the second sentence: 6 "Regulated entities are expected to try and resolve 7 their issues with the complainant directly where 8 possible." 9 This is to obviate the need for a complaint having 10 to be made in the first place, is it? 11 A. This is to try to push more complaints back directly to 12 the publisher to deal with, on the basis that that's 13 likely to be quicker for the complainant, and indeed it 14 is in the grain of what we're trying to do in terms of 15 increasing transparency and accountability within 16 publishers. 17 Q. Although one wouldn't expect a regulator of doctors or 18 lawyers to be placing such an obligation on its 19 regulated entities. Would you agree with that? 20 A. But this is, I think, symptomatic of the fact that 21 actually in newspapers, quite often simple inaccuracies 22 can occur just as a result of an accident. I think if 23 you are a doctor and a small accident occurs, that's 24 probably a rather different matter than if a fact is got 25 wrong in a short local newspaper report. So where those Page 2</p>	<p>1 that it could trigger an investigation. So it may just 2 be one episode. I think it is more likely to be where 3 there is evidence of veal breaches that have built up 4 over time, but it could be one. 5 Q. That arguably goes wider than that because it's the 6 breaches which indicate the relevant failure. The 7 relevant failure, although it's defined as a systemic 8 failure, is in fact either a systemic failure or 9 a serious failure. So you could have one single serious 10 failure which is indicated by one or more serial 11 breaches; do you see that? 12 A. Indeed, and that's why this is drafted in this way, to 13 give the trust board the maximum amount of discretion to 14 be able to trigger an investigation if it's clear that 15 one of those pertains. 16 Q. Regulation 31, just to cover a point that you made 17 before lunch, is where a regulated entity refuses to 18 provide information. That refusal will be notified to 19 the investigation panel. So that, as it were, the 20 refusal will trigger or might trigger an investigation 21 because in itself it in itself is regarded as a serious 22 infringement, isn't it? 23 A. Correct. 24 Q. The rest of it is probably self-explanatory, apart from 25 the issue of fines or financial sanctions which we see Page 4</p>

<p>1 in annex B. This is page 00063: 2 "Power to impose the sanction resides with the trust 3 board on a referral from the standards and compliance 4 panel." 5 That is annex B clause 1.1. Then there are various 6 guidelines. In 2.1: 7 "The trust board shall have the power to fine 8 a regulated entity up to 1 per cent of its annual 9 turnover." 10 But then there's a cap of £1 million in 2.2, so in 11 effect whichever is the higher. 12 But responsibility for these guidelines I think 13 resides with the IFB; is that correct? 14 A. In promulgating them in the first place, but as I said 15 earlier, they will become part of the regulations, so 16 they will, at that point, become the responsibility of 17 the regulator. 18 Q. Thank you. Can I go back then to your proposal 19 document, paragraph 40, the paragraph which deals with 20 complaints. 21 A. Bear with me one second, Mr Jay. 22 Q. 00089. 23 A. This is paragraph 40 of the proposal document? 24 LORD JUSTICE LEVESON: The statement? 25 MR JAY: The proposal document.</p> <p style="text-align: center;">Page 5</p>	<p>1 serious breach and that leads to a referral from the 2 complaints arm to the publisher because it raises 3 contractual disputes, so that when people go to the 4 complaints committee of the new regulator, they know 5 which are the various ways that their complaint could 6 possibly end. 7 That may help -- to go back to an issue you raised 8 earlier -- if necessary, to funnel more substantive 9 complaint through to an adjudication. I think that sort 10 of gradation of different types of sanction -- 11 identifying that and making it transparent could 12 actually be an important new element of the complaints 13 committee. 14 Q. Although many of these sanctions are not within the 15 power of the complaints committee, they would require 16 a referral to or action by the compliance and 17 investigation panel, for example; is that correct? 18 A. Such as? I'm looking in paragraph 43 -- in the form of 19 resolution, published apologies, formal reprimand 20 through an adjudication. Those would all be within the 21 power of the complaints arm. 22 Q. Yes, but any fine would have to be via referral to the 23 compliance investigation panel. 24 A. If a complaint was so serious that it warranted 25 investigation with potential financial sanction, that</p> <p style="text-align: center;">Page 7</p>
<p>1 A. Yes, dealing with complaints. I have it. 2 Q. I think it may be important to identify where this new 3 complaints arm of the trust board -- or the new 4 regulator, pardon me -- differs from the current PCC, in 5 what respects. Is it fair to say that the only real 6 difference is this: serving editors will no longer be 7 appointed by PressBoF or the IFB, but by the relevant 8 industry trade association? 9 A. That's one difference in the composition of it. I think 10 there may be some differences in process, but in the 11 composition, that is correct. 12 Q. As for process, how would you identify the relevant 13 differences between the PCC and this complaints 14 committee? 15 A. I think it's fair to say that probably in the way that 16 sanctions have been dealt with in the Press Complaints 17 Commission, there's been a certain degree of opacity 18 about them, both about the way the complaints are 19 actually resolved and indeed how they're recorded. What 20 I've been proposing in this document is that there 21 are -- that the regulator would in fact have a ladder of 22 sanctions from a fairly straightforward correction 23 through to a breach of the code that's remedied and 24 identified in statistics, through to a formal reprimand 25 of the editor, right up to where there has been a very</p> <p style="text-align: center;">Page 6</p>	<p>1 would have to be passed over to the relevant arm, yes. 2 Q. What the PCC does, if you compare paragraph 43 with 3 that, primarily it does informal resolution, which we 4 can see here. It does published apologies. I don't 5 think it does formal reprimands -- but I may be 6 corrected on that -- and it does adjudications but only 7 occasionally. So the only possible addition here is 8 formal reprimand, isn't it? 9 A. Yes, but what I'm talking about here is making the whole 10 process of this more transparent so that when 11 a complaint has to be conciliated through a complaints 12 arm, the complainant knows at the start: "These are the 13 various ways that your complaint may end up." I don't 14 think that is clear at the moment. 15 Q. Well, the complainant knows at the moment that his or 16 her complaint is not going to end up with a fine under 17 any circumstances or compensation. 18 A. That's correct. 19 Q. It may end up with an adjudication but it will be 20 obvious pretty soon that informal resolution is the 21 primary mode of dealing with the complaint. This system 22 doesn't differ very much from that, does it? 23 A. No, it's a simple codification of it, which I think 24 would help with reporting of statistics from the 25 regulator in a more transparent fashion than might have</p> <p style="text-align: center;">Page 8</p>

2 (Pages 5 to 8)

<p>1 been the case previously.</p> <p>2 Q. How does this system end up with more adjudications than</p> <p>3 the current system?</p> <p>4 A. That's going to have to be a matter for the complaints</p> <p>5 committee. As I said earlier, I would expect the</p> <p>6 regulator to take a more robust approach to adjudicating</p> <p>7 where there was clearly a public interest or on point in</p> <p>8 doing so.</p> <p>9 Q. But how may that expectation be translated into reality,</p> <p>10 particularly having regard to the fact that under this</p> <p>11 system, 2.25 million is set aside -- minus, of course,</p> <p>12 the enforcement 100,000 pot which we've referred to --</p> <p>13 and under the old system it's 1.95 million? There'll</p> <p>14 still be an impetus, for reasons of financial</p> <p>15 stringency, on mediation, won't there?</p> <p>16 A. I don't think the cost of taking a complaint to a formal</p> <p>17 adjudication would be that much different from the</p> <p>18 actual mediation process of a complaint. I think you</p> <p>19 also need to take into account with some of these things</p> <p>20 the wishes of the complainant. There will be some</p> <p>21 complainants who want a complaint dealt with privately</p> <p>22 by some form of resolution, who would actually object to</p> <p>23 a formal adjudication. I don't think it should be for</p> <p>24 the regulator in those circumstances to ride roughshod</p> <p>25 over the wishes of the complainant but I don't see any</p> <p style="text-align: center;">Page 9</p>	<p>1 Q. I think it could be written in fairly easily. The way</p> <p>2 it sounded coming out of my mouth as I was making it up</p> <p>3 as it went along made it sound a bit cack-handed but it</p> <p>4 could be done wide straightforwardly, I think.</p> <p>5 A. Yes.</p> <p>6 Q. You're agreeable with that principle?</p> <p>7 A. As I say, I would hope it would be a matter of best</p> <p>8 practice, but if there is merit in codifying it, we</p> <p>9 will.</p> <p>10 Q. In relation to group complaints, which has been an issue</p> <p>11 which has been of concern in relation to the PCC, could</p> <p>12 you summarise how this process will differ from the</p> <p>13 PCC's process? You may want to look at paragraph 9 of</p> <p>14 the regulations in this context, Lord Black.</p> <p>15 A. Indeed. I think there are two ways that there is</p> <p>16 a difference. As you rightly say, Mr Jay, regulation 9</p> <p>17 will give the regulator and the complaints committee the</p> <p>18 power to take up a third-party complaint where it</p> <p>19 believes there is a significant public interest in doing</p> <p>20 so. So I think that if a group was able to show that</p> <p>21 there was a very good reason why a complaint should be</p> <p>22 taken up, then it would.</p> <p>23 I also think that there may be a role for the</p> <p>24 standards arm in this as well and if there is a group</p> <p>25 that feels that it has been particularly badly treated,</p> <p style="text-align: center;">Page 11</p>
<p>1 difference in expense in these two things, certainly</p> <p>2 such that would cause that budget figure to be knocked.</p> <p>3 Q. So you're expecting the new regulator to form a judgment</p> <p>4 as to which complaints of their nature are best dealt</p> <p>5 with by mediation -- it may be that the wishes of the</p> <p>6 complainant will be very important here -- and which</p> <p>7 should move forward for full adjudication; is that --</p> <p>8 A. Yes, indeed, which would be helpful to the regulator in</p> <p>9 possibly bringing forward best practice guidelines in</p> <p>10 a specific area relating to an individual subject which</p> <p>11 would need to be done and hammered out on the back of</p> <p>12 the adjudication.</p> <p>13 Q. Do you think it might be better to have a sort of</p> <p>14 threshold written into the regulations which, if the</p> <p>15 regulator thought that there was prima facie evidence of</p> <p>16 a serious breach of the code or breach of the code which</p> <p>17 was other than minimum or raised minor questions of</p> <p>18 inaccuracy, then unless the complainant wished</p> <p>19 otherwise, almost as a matter of obligation, the</p> <p>20 regulator should take that forward to an adjudication?</p> <p>21 A. I would expect that to be the best practice of the</p> <p>22 regulator. If there's a case for writing that in, if it</p> <p>23 can be codified in a way which can be written into</p> <p>24 regulations, then I wouldn't see a principled objection</p> <p>25 to that.</p> <p style="text-align: center;">Page 10</p>	<p>1 perhaps across a section of the press, and this has</p> <p>2 arisen over time, in a -- to use that word -- systemic</p> <p>3 way again, then that may be a case that the standards</p> <p>4 arm of the body could look at to trigger an</p> <p>5 investigation into that area.</p> <p>6 LORD JUSTICE LEVESON: Does that mean you visualise the</p> <p>7 possibility that a group can't make a complaint about</p> <p>8 a specific article but could spend a year collecting up</p> <p>9 half a dozen and then complain to standards? That</p> <p>10 doesn't seem to be terribly sensible.</p> <p>11 A. No, regulation 9, sir, would give a group -- on the back</p> <p>12 of one single complaint, it would give the regulator the</p> <p>13 discretion to be able to take that up.</p> <p>14 LORD JUSTICE LEVESON: Yes, but with respect there has to be</p> <p>15 a significant breach of the code, not just a breach.</p> <p>16 There has to be a substantial public interest -- not</p> <p>17 merely a public interest -- and even then, that's in the</p> <p>18 discretion of the head of complaints. I'm not sure how</p> <p>19 different that is from the present system, which merely</p> <p>20 says, "We normally accept complaints only from those who</p> <p>21 are directly affected by matters about which they are</p> <p>22 complaining", but which obviously admits of the</p> <p>23 possibility that you're prepared to go further. And</p> <p>24 indeed, it's been said that the PCC is prepared to go</p> <p>25 further. I'm not sure you've changed anything. If</p> <p style="text-align: center;">Page 12</p>

3 (Pages 9 to 12)

<p>1 anything, you've made it more clear that there has to be 2 significant breach and a substantial public interest. 3 Is that really what you wanted to do? 4 A. I think there is danger, as we saw in the case of the 5 Press Council many years ago, in a regulator having to 6 take up unfettered third party complaints. I think that 7 where it is a third party complaint, except on a matter 8 of accuracy, where the regulator, of course, will be 9 able to take up a complaint which is from a third party, 10 then we need to build some form of discretion in here. 11 LORD JUSTICE LEVESON: Where does it say that? 12 A. Where does it say what? 13 LORD JUSTICE LEVESON: A third party can always make 14 a complaint about accuracy? 15 A. That's always been the case of the Press Complaints 16 Commission. On accuracy of a point of fact, if it says 17 something about a group -- if it says a group is X, Y or 18 Z and that is wrong, then that group can take up an 19 accuracy complaint. 20 LORD JUSTICE LEVESON: That doesn't come within paragraph 9, 21 does it? 22 A. But that's the existing practice so that would continue 23 under the code. 24 MR JAY: It could be said that this regulation is a greater 25 force than the code and defines all the circumstances in</p> <p style="text-align: center;">Page 13</p>	<p>1 LORD JUSTICE LEVESON: It might be said that this 2 regulation 9 limits that which you say you presently do, 3 and therefore if you don't want to limit it, you'd 4 better write it in, and I'm not talking about -- 5 I understand the problem about group complaints but you 6 know that I have heard from those with mental illness, 7 those with disabilities, those other groups not simply 8 complaining about taste and decency or necessarily about 9 the ability of a publication to express an opinion, but 10 about downright misleading reportage. That's the 11 complaint that I've received and you may say it's not 12 really valid or you may say anything you like, but if 13 you want to deal with it, doesn't it have to be in the 14 regulations? 15 A. But those complaints can be dealt with under clause 1 of 16 the code as it stands. If it's to do with misleading 17 coverage of a group, then a group could be entirely 18 entitled -- and you may want to talk to Lord Hunt about 19 this later because I'm sure he's been dealing with some. 20 A group may well be able to take a complaint to the PCC 21 to say that this report says that whatever -- the 22 traveller community or whatever it might be -- it makes 23 certain allegations about them and they're wrong. That 24 complaint is already amenable to resolution or 25 adjudication under clause 1 of the code.</p> <p style="text-align: center;">Page 15</p>
<p>1 which complaints can be brought by what are described as 2 third-party groups. 3 A. It's taken in conjunction with the code -- I agree with 4 that, Mr Jay -- in order to be able to give the 5 regulator quite significant powers to the take up group 6 complaints where it wishes to do so. 7 LORD JUSTICE LEVESON: But you think the words "significant" 8 and "substantial" are essential because otherwise the 9 head of complaints won't be able to exercise his 10 discretion appropriately? 11 A. I think those words are important in there so that the 12 regulator doesn't have to take up every single 13 third-party complaint that comes to it on a potential 14 matter of discrimination. 15 I remember from my own time of the Press Complaints 16 Commission, sir, that we dealt with quite a lot of 17 potentially discriminatory issues, certainly regarding 18 people with mental illness and mental health reporting 19 on the back of good complaints under clause 1 of the 20 code dealing with accuracy. So there are ways that 21 groups can complain in the existing -- using the 22 existing powers and this is meant to be a further 23 assistance to them on top of that. So I think it 24 actually strengthens the position for groups rather than 25 weakens it.</p> <p style="text-align: center;">Page 14</p>	<p>1 LORD JUSTICE LEVESON: It may be, but it doesn't seem to be 2 within rule 9. Anyway. Lord Hunt is nodding away, so 3 he'll be able to -- 4 A. Oh good. 5 MR JAY: I think Lord Justice Leveson's point is right in 6 perhaps a different way. It is within rule 9 but the 7 threshold now is higher, because whereas before you just 8 had to show a breach of article 1 of the code, now you 9 have to show a significant breach. 10 A. I think, Mr Jay -- if you'll forgive me, I think this is 11 simply just to do with the drafting of the regulation. 12 LORD JUSTICE LEVESON: Well, it may be -- 13 A. But this is not intended to limit the ability of groups 14 to complain under clause 1 of the code. 15 LORD JUSTICE LEVESON: I'm sure Lord Hunt will have all the 16 answers. 17 A. He usually does, sir. 18 LORD JUSTICE LEVESON: Yes. 19 A. But just to confirm, this is intended to make it easier 20 for groups to bring discrimination complaints under the 21 discrimination clause of the code. 22 MR JAY: I can see that. If the purpose of rule 9 is to 23 lock into clause 15 of the existing code, then you would 24 be right. 25 A. Then we need to clarify.</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

<p>1 Q. The wording is deficient.</p> <p>2 A. I'll take it up with --</p> <p>3 LORD JUSTICE LEVESON: I can only say how I read it, that's</p> <p>4 all, and I'm perfectly happy to be told that I am</p> <p>5 reading it wrongly.</p> <p>6 A. You may be reading it correctly, sir, but the intention</p> <p>7 is as I've outlined it.</p> <p>8 LORD JUSTICE LEVESON: I understand, I understand.</p> <p>9 MR JAY: Can I go back to your ladder of sanctions point,</p> <p>10 Lord Black, paragraph 43 of your statement. 00090. One</p> <p>11 of the points which has been made to this Inquiry</p> <p>12 relates to the publication of critical adjudications and</p> <p>13 apologies. It's under the amended clause of the code.</p> <p>14 It has to be with due prominence, I think, but as agreed</p> <p>15 with the regulator or the PCC. I can't remember the</p> <p>16 exact language but can we understand precisely what's</p> <p>17 intended you under the new system? You say:</p> <p>18 "It would also be for the regulator to look into how</p> <p>19 critical adjudications are presented and branded in the</p> <p>20 relevant publication to make clear that it's been</p> <p>21 criticised and under the code to agree where it should</p> <p>22 be place."</p> <p>23 But the regulator, I think, under the new system,</p> <p>24 will have the right to say, in default of agreement,</p> <p>25 where the adjudication or apology should be placed; is</p> <p style="text-align: center;">Page 17</p>	<p>1 Q. Is this a matter for the Code Committee or the</p> <p>2 regulations?</p> <p>3 A. It will be a matter for both.</p> <p>4 Q. If it's a matter for the regulations, unless we see it</p> <p>5 in the regulations now, any amendment to the regulations</p> <p>6 will have to be agreed by the industry, wouldn't they?</p> <p>7 A. But if it's in the code, then the code -- because</p> <p>8 compliance with the code is written into the contract,</p> <p>9 then it will have the force of contractual obligation as</p> <p>10 a result.</p> <p>11 Q. So it would be a case then of the trust board ratifying</p> <p>12 the recommendation of the Code Committee to amend the</p> <p>13 existing code to include these provisions?</p> <p>14 A. Correct, which is why I put down there it's a matter for</p> <p>15 them to deal with.</p> <p>16 Q. Thank you. I'm looking over the remainder of this</p> <p>17 proposal, just to check whether there are points which</p> <p>18 we haven't covered orally.</p> <p>19 LORD JUSTICE LEVESON: Well, there are many, but the</p> <p>20 question is which ones you want to cover.</p> <p>21 MR JAY: Most of them we have covered already but I stand to</p> <p>22 be corrected.</p> <p>23 Yes, the process of appeal. I don't think we've</p> <p>24 covered that very clearly, Lord Black, so can we do that</p> <p>25 now? It may be that if we go back to our schema, which</p> <p style="text-align: center;">Page 19</p>
<p>1 that correct?</p> <p>2 A. The regulator will have to agree with the publication</p> <p>3 where the adjudication will go. So it will give the</p> <p>4 regulator a say over that, yes.</p> <p>5 Q. Sorry, it either has the say over it or it agrees with</p> <p>6 the relevant publication where it will go. They're</p> <p>7 different possibilities. I'm not sure which you're</p> <p>8 saying --</p> <p>9 A. In most cases, I expect it would be a matter of</p> <p>10 agreement. If the regulator disagreed with that, then</p> <p>11 it would be open to the regulator to say: no, no, no, it</p> <p>12 should go in X, Y or Z. But that is going to be</p> <p>13 a matter for the code to be changed.</p> <p>14 Q. It's not clear to me why there should be any</p> <p>15 equivocation over this. A proper regulator should be</p> <p>16 able to say to the publisher: "I don't care what you</p> <p>17 say, this is where it's going to go, end of story." Is</p> <p>18 that going to be the position under this new system or</p> <p>19 not?</p> <p>20 A. I think that's going to be a matter for the regulator to</p> <p>21 have to deal with Code Committee. That's why I tried to</p> <p>22 make clear here it will be a matter for the new</p> <p>23 regulator to set these out. I'm not going to try and</p> <p>24 tie the hands of a new regulatory body before it's</p> <p>25 launched.</p> <p style="text-align: center;">Page 18</p>	<p>1 is appendix 2, we're going to understand how it works.</p> <p>2 Look first of all at the complaints committee and</p> <p>3 its decisions.</p> <p>4 A. Yes.</p> <p>5 Q. Have I correctly understood it that both the complainant</p> <p>6 and the publication can appeal to the independent</p> <p>7 assessor?</p> <p>8 A. No, it would be my view that this was just for the</p> <p>9 complainant to be able to appeal the decision.</p> <p>10 Q. Right. So the aggrieved publication would have no right</p> <p>11 to take matters further to the independent assessor or</p> <p>12 anywhere else; is that correct?</p> <p>13 A. As indeed meets the existing -- the publication has to</p> <p>14 abide by the decision, in this case of the complaints</p> <p>15 committee.</p> <p>16 Q. If there is an adverse decision of the compliance and</p> <p>17 investigation panel, there, of course, although there</p> <p>18 may be a victim in the background because the failure is</p> <p>19 systemic -- we're looking at a range of victims so it's</p> <p>20 much more diffuse, but they will be out there</p> <p>21 nonetheless -- the aggrieved publication would have the</p> <p>22 right to make representations to the trust board, who</p> <p>23 would then appoint a further compliance and</p> <p>24 investigation panel to review the decision of the first</p> <p>25 panel; is that correct?</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 A. Yes. I don't think the trust board would automatically 2 do that. In the first instance, the trust board would 3 look at the nature of the representations that have been 4 put to it, either -- presumably the process had not been 5 fairly followed. If the trust board believed there to 6 be a prima facie case, it would then appoint another 7 panel of three people, obviously not involving the 8 panel -- the people on the panel in the first place, who 9 would look at the decision afresh.</p> <p>10 Q. That's the point I would like to take further with 11 Lord Hunt when he comes to give evidence, but that's how 12 you envisage it working, is it?</p> <p>13 A. Correct.</p> <p>14 Q. Incentives to join. This is paragraph 65 of the 15 proposal document, page 00099.</p> <p>16 A. Bear with me one second. Yes.</p> <p>17 Q. You're looking for carrots and sticks here because this 18 is a voluntary system and your first carrot is the 19 provision of press cards, which you take up at 20 paragraph 66. You describe it as a proposal currently 21 under consideration. There would be 17 gatekeepers who 22 issue cards to ensure that where a journalist is 23 employed by a newspaper or magazine, they will be able 24 to receive a press card only when their publisher is 25 signed up to the system of self-regulation.</p> <p style="text-align: center;">Page 21</p>	<p>1 A. That other body, sir, would have to take into account 2 whether it was just being used in order to shortcircuit 3 the scheme.</p> <p>4 LORD JUSTICE LEVESON: But the journalist would say, "But 5 I'm absolutely committed to all the rules of the PCC. 6 I am entirely ethical journalist. Nobody has ever 7 questioned my personal integrity in any way. How can 8 you possibly deprive me of a press card which will have 9 an impact on my right to earn a livelihood?"</p> <p>10 A. Those are matters which the press card authority has 11 looked at and I think is clear in its own mind that this 12 is not going to be an insuperable problem to the 13 introduction of this scheme.</p> <p>14 MR JAY: Another possible incentive you say is whether the 15 Press Association might provide its copy only to 16 publications which have signed a contract with the 17 regulator. You say: 18 "PA News is currently undertaking a study in what is 19 a legal challenging area but one which could provide 20 a key incentive." 21 Can you be a bit clearer as to what this study is 22 about?</p> <p>23 A. As I understand it, this was a scheme that was generated 24 from within the Press Association by some of its own 25 members who want to look at it to see if it could be an</p> <p style="text-align: center;">Page 23</p>
<p>1 How does this differ from a system of licensing 2 journalists?</p> <p>3 A. I believe you have a submission from the UK Press Cards 4 Authority which deals with this in much more detail. 5 It's not just where they obviously are a journalist 6 signed up to a newspaper, but they could be signed up to 7 a relevant industry body or a trade union or something 8 like that, so it is not limiting it simply to people who 9 work for specific publications. But of course, the 10 provision of a press card is an assistance to 11 journalists who are going about their business. It is 12 not a complete bar to them going about their business. 13 There will be all sorts of journalists who never need 14 the provision of a press card. That's why I think there 15 is a fundamental between this and any form of licensing. 16 Indeed, the various gatekeepers to the scheme I think 17 would never have any truck with anything that appeared 18 to be a system of licensing with journalists. So 19 I believe it's a useful incentive but it's not a bar to 20 trade.</p> <p>21 LORD JUSTICE LEVESON: I don't understand how it works, 22 because a newspaper could say, "I'm not interested, I'm 23 not going to get involved in this", and encourage all 24 its journalists to go through some other body to get its 25 press cards.</p> <p style="text-align: center;">Page 22</p>	<p>1 incentive to support this system. At the moment, PA 2 News will have contracts with a number of people to 3 provide news and some of those will be over different 4 terms. PA News also has certain obligations regarding 5 the provision of news, so I think it is going to have to 6 look to see whether such a scheme could actually be made 7 to work in this area or whether there would be 8 insuperable legal obligations. That is far from clear 9 at the moment. That's why they are now looking into it, 10 I believe with a view to reporting to the PA board 11 by September.</p> <p>12 Q. But it would obviously depend on PA News if any legal 13 obstacles in relation to anti-competition law were 14 surmounted to agree to participate in this sort of 15 arrangement?</p> <p>16 A. If there were obvious competition law reasons why this 17 could not proceed, then this scheme would obviously not 18 proceed. Indeed, I think it's a point you covered in 19 one of your questions which -- there is further legal 20 opinion which has been tabled for the Inquiry.</p> <p>21 Q. Yes. That opinion is on more general aspects. It's not 22 addressed specifically on these individual contracts 23 between PA and publications, but we see where we are on 24 that. They're reporting in September.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 Q. Then there's kite mark or badge. Well, that's 2 self-explanatory.</p> <p>3 A. Yes.</p> <p>4 Q. And then there's the issue of advertisement, which is 5 paragraph 69. There are likely to be the same sort of 6 issues there, perhaps even greater ones, than the issues 7 you've identified in relation to the Press Association; 8 is that correct?</p> <p>9 A. Yes. I would not believe this to be straightforward, 10 although having said which, the point I make in the 11 final sentence about the role of government in this area 12 probably could be a little bit more straightforward. 13 But that's a matter that I've not discussed with 14 ministers or officials, but should like to.</p> <p>15 Q. Part of the philosophy may be bringing in the PA and the 16 Incorporated Society of British Advertisers into the 17 regulatory framework, which they may or may not be 18 willing to do. Do you agree?</p> <p>19 A. Well, the Press Association is currently signed up to 20 the terms of the code of practice, so it is part of the 21 regulatory framework from that point of view. 22 Advertising, of course, is an entirely separate system 23 of regulation and I think that would be a very difficult 24 step. The advertisers that I've spoken to have been 25 very clear with me: "We are enormously grateful to the</p> <p style="text-align: center;">Page 25</p>	<p>1 Leveson has. They start at page 00037. I'm just 2 interested in the objects of the new company. The 3 status of the new company is as a community interest 4 company, so it's not a current company limited by 5 guarantee but it has certain objectives which work in 6 the public interest and therefore has that status, 7 hasn't it?</p> <p>8 A. Yes.</p> <p>9 Q. That's not a problem. The objects themselves: 10 "Activities which benefit the community, in 11 particular to promote and uphold the highest 12 professional standards of journalism." 13 Then we see various subsidiary objects in relation 14 to the regulatory scheme, the code of practice, ability 15 to levy fines, et cetera, and then at the end of 16 clause 5: 17 "Having regard at all times to the importance in 18 a democratic society of freedom of expression and the 19 public's right to know." 20 There's nothing there, Lord Black, about the rights 21 of individuals or the importance of the public interest 22 in other rights beyond freedom of expression, such as 23 individual's rights to privacy. Would you agree with 24 that?</p> <p>25 A. I would hope that that was covered by the phrase "the</p> <p style="text-align: center;">Page 27</p>
<p>1 printed press for the support they give us in making 2 advertising self-regulation work. If there's some way 3 we can find to help support press self-regulation, then 4 we'll do it."</p> <p>5 Q. I'm going to move forward now to paragraph 83. 6 Embedding accountability and transparency in the system. 7 You say there: 8 "The industry will wish the regulator to be as open 9 and transparent as possible. It will be for the trust 10 board to establish the precise way it seeks to achieve 11 that, including the setting of benchmarkings and 12 targets, publication of statistics, et cetera." 13 So much will depend on how the regulator wishes to 14 comport itself in due course, doesn't it?</p> <p>15 A. Yes. I would see no objection to outlining the areas 16 where these sorts of things should be met into the 17 regulations. I just think it would be not right for us 18 at this stage to set down how that might actually be 19 achieved, but I think a general view that the regulator 20 should be open and transparent might be something that 21 it's very important to codify in the regulations or 22 indeed the articles of association, which might be 23 a more appropriate place for it to go.</p> <p>24 Q. The articles of association we haven't looked at until 25 now. They're under tab 5 of the bundle Lord Justice</p> <p style="text-align: center;">Page 26</p>	<p>1 highest professional standards of journalism" because it 2 would seem to me that the highest professional standards 3 of journalism encompassed the rights of individuals.</p> <p>4 Q. It might or might not do, but we see full regard here to 5 Article 10 rights and no express reference to Article 8 6 rights.</p> <p>7 A. I would have no objection to the first sentence of the 8 objects being clarified to make clear that Article 8 9 rights were of course of equal importance. I think it 10 is covered by the phrase "highest professional standards 11 of journalism" but if it's not explicit enough then we 12 could look at dealing with that point.</p> <p>13 Indeed, as the company responsible for promoting 14 compliance with the Editors' Code of Practice, the 15 Editors' Code of Practice does, of course, set out 16 individual rights on privacy, children, hospital victims 17 and so forth.</p> <p>18 LORD JUSTICE LEVESON: But then what does the last clause of 19 5 add: 20 "... having regard at all times to the importance of 21 ...(reading to the words)... right to know." 22 Because that's also within the Editors' Code of 23 Practice. It's also part of the highest professional 24 standards of journalism.</p> <p>25 A. Yes indeed, sir, which is why I say I have no objection</p> <p style="text-align: center;">Page 28</p>

7 (Pages 25 to 28)

<p>1 to the Article 8 rights being set out.</p> <p>2 MR JAY: Some general questions now, Lord Black. Internal</p> <p>3 governance, as your statement itself recognises, has</p> <p>4 been part of the problem in relation to the culture,</p> <p>5 practices and ethics of the press. How will the new</p> <p>6 system, including in particular the annual certification</p> <p>7 process, address that problem?</p> <p>8 A. I think there are two aspects of this. First of all,</p> <p>9 inherent in this system -- and I suspect it is spelled</p> <p>10 out somewhere in the contract or the regulations -- is</p> <p>11 that there should be a named senior individual within</p> <p>12 each company, each regulated entity, who is responsible</p> <p>13 for the maintenance of standards, compliance with the</p> <p>14 code of practice and reporting annually to the regulator</p> <p>15 and then dealing with the follow-up from the regulator.</p> <p>16 So for the first time in each company, there will be</p> <p>17 a named senior individual who is going to be responsible</p> <p>18 for this.</p> <p>19 And I think for publishers there are two real</p> <p>20 incentives for making that work. First of all, they do</p> <p>21 have to go through a process of annual certification,</p> <p>22 which, as we heard earlier, is going to be a transparent</p> <p>23 process of certification. So there will be a public</p> <p>24 scrutiny of the like that has not been before, and that</p> <p>25 will be a real incentive to make sure that the annual</p> <p style="text-align: center;">Page 29</p>	<p>1 I think that's an important relationship there. The</p> <p>2 difficulty, I think, of making the proprietor the named</p> <p>3 individual in charge of internal compliance and so forth</p> <p>4 is that in reality, the proprietor is not going to be</p> <p>5 sitting there every day looking at complaints trends and</p> <p>6 making sure that complaints are handled. They will, of</p> <p>7 course, have overall responsibility for it, but they</p> <p>8 can't be expected to get involved in the detail of it.</p> <p>9 Some newspapers, of course, don't even have</p> <p>10 proprietors, in which circumstances it would fall back</p> <p>11 to the chief executive in any case. I think you have to</p> <p>12 respect the nature of the company involved as to whom</p> <p>13 they choose to have as the senior person. I would also</p> <p>14 expect the regulator, if they believed that the person</p> <p>15 who was not nominated was not appropriate and not senior</p> <p>16 enough, to say that.</p> <p>17 Q. Okay. You pointed out earlier -- this is clear from</p> <p>18 regulation 26 -- that the trust board starts an</p> <p>19 investigation either on its own initiative or following</p> <p>20 a complaint or suggestion by the head of complaints or</p> <p>21 standards. Why is the head of standards not able to set</p> <p>22 up an investigation without going to the trust board?</p> <p>23 A. I think the decision to set up an investigation is</p> <p>24 a very serious one. It could prove very costly -- it</p> <p>25 will prove very costly to one party or another, and</p> <p style="text-align: center;">Page 31</p>
<p>1 certification goes smoothly and that there are no issues</p> <p>2 identified which might trigger an investigation.</p> <p>3 Secondly, there will be an added incentive that if</p> <p>4 there is a standards investigation at some point,</p> <p>5 because of a systemic breakdown or whatever it might be,</p> <p>6 then I think it will be for the regulator to take</p> <p>7 account of the processes that were in place within the</p> <p>8 publisher to have stopped that in the first place.</p> <p>9 So if a publisher who doesn't have those systems in</p> <p>10 place is found guilty, I would expect that then the</p> <p>11 regulator would take that into account in levying the</p> <p>12 sanction. So there are going to be real incentives to</p> <p>13 the publisher to make sure that the system actually</p> <p>14 works and indeed they will be accountable to the</p> <p>15 regulator for it.</p> <p>16 Q. A former prime minister gave evidence along the lines</p> <p>17 that editors and proprietors should be the responsible</p> <p>18 named individuals. Moreover, if there are serious</p> <p>19 breaches of standards established against their papers,</p> <p>20 they should be accountable for those breaches and, if</p> <p>21 necessary, fined. Is that something you would find</p> <p>22 favour with or not?</p> <p>23 A. Well, the editor is always going to be responsible</p> <p>24 contractually to the publisher and the publisher is the</p> <p>25 one who is going to have to sign the contract, and</p> <p style="text-align: center;">Page 30</p>	<p>1 I think there should be checks and balances in that</p> <p>2 system so that an official, quite rightly, should have</p> <p>3 the cover of some form of accountability through the</p> <p>4 trust support. All this regulation is saying is that</p> <p>5 the head of standards believes there to be a case to</p> <p>6 answer. The trust board just needs to look at that on</p> <p>7 paper and say yes.</p> <p>8 Q. If you look at the regulations, the regulated entity has</p> <p>9 numerous opportunities to make representations. Look,</p> <p>10 first of all, at regulation 27, our page 00056. This is</p> <p>11 whether an investigation is going to be set up in the</p> <p>12 first place. A letter has to be written to the</p> <p>13 regulatory entity to that effect and the regulated</p> <p>14 entity shall reply to that notification within 14 days,</p> <p>15 either consenting to the investigation or setting out</p> <p>16 reasons why the investigation should not take place. So</p> <p>17 that's the first opportunity to make representations.</p> <p>18 Then there are further opportunities at</p> <p>19 regulation 36. This is our page 00058. This is an</p> <p>20 invitation to attend for part of the meeting in order to</p> <p>21 answer questions from the investigation panel.</p> <p>22 LORD JUSTICE LEVESON: You have to go through 32 as well,</p> <p>23 don't you? So if there's a dispute between the entity</p> <p>24 under investigation and head of compliance, that's</p> <p>25 referred to the trust board.</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)

<p>1 MR JAY: Yes. So any dispute is referred. Then there's 2 a further opportunity at 36. At 40, this is the 3 investigation panel's preliminary decision. That's sent 4 in draft to the regulated entity which then has 14 days 5 to comment on the draft. Then regulation 44, that's an 6 ability to request a review, which you told us about 7 earlier. Then regulation 51, the review panel's 8 preliminary draft the decision is sent in draft to the 9 regulated entity for comment and it's only the final 10 decision of the review panel at regulation 53 which is 11 final.</p> <p>12 The basic point is doesn't that give so many 13 opportunities to the regulated entity to, as it were, 14 put a spanner in the works that it would be surprising 15 if any adverse decision were reached following an 16 investigation of this sort?</p> <p>17 A. I don't think so. I see nothing abhorrent in giving the 18 regulated entity the ability to make representations at 19 certain junctures throughout this. I don't think it can 20 be overstated quite how serious an adverse finding from 21 the standards and compliance panel of the new regulator 22 would be, and therefore I think the regulated entity 23 needs to be dealt with fairly and proportionately and 24 that means they should have the ability to put their 25 case at certain points during this. That would just</p> <p style="text-align: center;">Page 33</p>	<p>1 Q. So they drafted it then and no doubt have taken into 2 account representations made during the three 3 consultation processes of the industry?</p> <p>4 A. There have been a huge number of comments that have 5 arisen during the consultation exercises. So this 6 document you have here today is very different from the 7 original document you started with. It's actually been 8 an extremely constructive process but at the end of the 9 day this is the industry's document.</p> <p>10 Q. Yes.</p> <p>11 A. Which, as I said earlier -- I keep reiterating -- is 12 a snapshot of where I believe the consensus currently 13 lies.</p> <p>14 LORD JUSTICE LEVESON: Is there any prospect in this 15 document for the person who has complained about an 16 egregious breach of standards to ask for a review of 17 a decision adverse to them but in favour of the entity 18 being investigated?</p> <p>19 A. I'm not sure I follow the question, sir.</p> <p>20 LORD JUSTICE LEVESON: I'm sorry, I'm sure it's my fault. 21 Is there anything in this document which allows the 22 complainant -- the person who is complaining about an 23 egregious breach of standards and has put the matter 24 before the new body to investigate -- to be involved in 25 seeking to challenge a decision of the panel that's</p> <p style="text-align: center;">Page 35</p>
<p>1 seem to me to be natural equity and natural justice.</p> <p>2 Q. Certainly it should have the right to put their case 3 once, but they seem to have the right to put their case 4 six or seven times. Isn't that creating a degree of 5 bureaucracy and such an opportunity to make 6 representations that it would either take a very long 7 time to reach an adverse decision against a regulated 8 entity or it won't happen at all?</p> <p>9 A. I don't think that with some of these, for instance, if 10 a dispute arises, that this should necessarily be 11 something which delayed the process for an overly long 12 time. I certainly think if, at the end of it, there is 13 going to be a very serious financial sanction against 14 the regulated entity, that it should be have the 15 opportunity to put its case to the trust board.</p> <p>16 I think it highly unlikely that during the course of 17 an investigation a regulated entity would take every 18 single opportunity to try to derail it, but even if it 19 did, then the trust board and the investigation and 20 compliance panel must plough on and it will get to the 21 right place in the end.</p> <p>22 Q. Who is responsible for drafting these regulations?</p> <p>23 A. These have been drafted by PressBoF in association with 24 legal advisers, Reynolds Porter Chamberlain working with 25 Andrew Green.</p> <p style="text-align: center;">Page 34</p>	<p>1 actually against them and in favour of the newspaper?</p> <p>2 A. It would have to take a case for judicial review, 3 because it would be at trust board which would be 4 triggering the investigation, so you would have to 5 review the decision of the trust board.</p> <p>6 LORD JUSTICE LEVESON: And, of course, presumably at any one 7 of these stages, it would be open to the regulated 8 entity to judicially review a decision?</p> <p>9 A. I think in a system where they have submitted -- to go 10 back to a point we made earlier, to the terms of the 11 contract, that would be an unlikely prospect, but in 12 theory, I suppose it is possible.</p> <p>13 MR JAY: Their remedy would be a contractual remedy, the 14 argument being it was an implied term of the contract 15 between the regulated entity and the regulator that the 16 latter act fairly and --</p> <p>17 A. Certainly it would have to go to court for that.</p> <p>18 Q. So it would be very similar to judicial review in terms 19 of --</p> <p>20 A. But it would be in the courts. Breach of contract.</p> <p>21 LORD JUSTICE LEVESON: Yes.</p> <p>22 MR JAY: I've been asked by others to ask two further points 23 of you, Lord Black. First of all, I think you've seen 24 this -- I handed it to you earlier: the submission 25 PressBoF made in 2009 to the DCMS Select Committee on</p> <p style="text-align: center;">Page 36</p>

<p>1 privacy and libel, where PressBoF -- I'm not going to 2 read it all out -- pointed out that the PCC works well, 3 the code of practice has raised standards: 4 "To concentrate on one atypical episode [well, that 5 was phone hacking] which was always inevitably heading 6 in the direction of litigation would be a great 7 mistake." 8 Then you refer in that submission to recommendations 9 on reform of conditional fees and the Human Rights Act 10 to reverse the extremely serious damage they are doing 11 both to freedom of expression and to the long-term 12 commercial future of the press, which is now facing 13 unprecedented challenges. 14 Do you stand -- this is the question -- by the 15 assessments that were preferred by you in 2009? 16 A. I suspect this was from before I was chairman of 17 PressBoF, but I will take responsibility for it. 18 I would certainly stand by paragraph 38 about the 19 fundamental legal and commercial issues affecting the 20 industry, and indeed, if anything, the 21 structural/financial issues which have affected the 22 industry have become significantly worse since 2009. So 23 I have no difficulty standing by that. 24 But as far as paragraphs 39 and 40 are concerned, 25 this time last year the world changed within the space Page 37</p>	<p>1 the story of MPs' expenses, I think there's no doubt 2 about the importance of the story. I'm sure that a lot 3 of the journalists who worked on it are probably held in 4 low esteem by a number of MPs, so it is, I think, 5 probably a relative point. It may have been -- 6 LORD JUSTICE LEVESON: I don't think that's a terribly good 7 point. I'm sure that those guilty of crime don't think 8 very highly of those that expose them. 9 A. That's why I'm just not sure of the context in which 10 I made the statement, sir. 11 LORD JUSTICE LEVESON: All right, all right. 12 A. Oh good, somebody -- 13 MR JAY: We do have the context now. I'm very grateful. It 14 is in the submission I mentioned. It was your last 15 interview before working for the Conservative Party in 16 2004. That's what you said as the outgoing director of 17 the PCC. I think you left the PCC in December 2003; is 18 that correct? 19 A. Correct. 20 LORD JUSTICE LEVESON: How these things come back to haunt 21 you. 22 MR JAY: Does that ring a bell? 23 A. One of the reasons I hardly ever give interviews. 24 I think I probably was trying to make the general point 25 that journalists ruffle feathers from time to time and Page 39</p>
<p>1 of one week, so I think to look at things which were 2 written three years ago -- it's almost impossible to do 3 so. Of course I don't stand by that particular 4 sentence. It is now clear that it wasn't one atypical 5 episode in the way that some people thought it was at 6 that time, and that is why we've undertaken the very 7 arduous process to which Lord Justice Leveson referred 8 earlier over the course of the last five months. We 9 wouldn't have done that if we'd stuck by this statement. 10 Q. The other point I'm asked to put to you is that you 11 said, some time ago now, that "a good journalist should 12 rejoice in being held in low esteem by the public"; do 13 you stand by that? 14 A. Did I say that? 15 Q. Yes. 16 A. Can you just remind me of the circumstances in which 17 I might have said it, Mr Jay? 18 Q. It's in the MediaWise submission for Module 4 of this 19 Inquiry. I could find it for you, but -- I can't give 20 you the context but if you don't remember having said 21 it, it may be difficult for me to pursue the question. 22 It will either ring a bell with you or it won't. 23 A. I don't remember having said it, but let me just give 24 you sort of one obvious example. The paper which I work 25 for, which, as you've heard during this Inquiry, broke Page 38</p>	<p>1 that irritates people. A point I stick with. 2 Congratulations to MediaWise for finding it. 3 Q. There are points of detail, Lord Black, which I could 4 pursue further with you, but I was concerned just to 5 look at the general picture. We have gone over the time 6 which had been notionally allotted to you so that 7 concludes all the questions I have. 8 LORD JUSTICE LEVESON: Thank you very much. 9 A. Can I say, Mr Jay, I would be very happy if there are 10 specific points of detail you want to cover -- I mean, 11 to write to us and we can set them out in writing if 12 they relate to the detail of the contract. 13 LORD JUSTICE LEVESON: Thank you very much indeed. 14 MR JAY: The only point I raised expressly with Mr Hunter QC 15 was further assistance on the competition law aspects of 16 this proposal. 17 A. Which we're intending to provide. 18 MR JAY: Thank you. 19 LORD JUSTICE LEVESON: Well, Lord Black, a couple of times 20 you've dangled a carrot in front of me. As I'm sure 21 you'll appreciate, the purpose of requesting you to 22 return to give evidence was to test the propositions 23 with which the Press Standards Board of Finance have 24 advanced, and that, I hope, is what we've done. You've 25 invited me to encourage you to go further, but I'm Page 40</p>

10 (Pages 37 to 40)

<p>1 equally sure you'll appreciate that I am not prepared 2 now to create an expectation that I will propose or give 3 favour to one as opposed to another solution. In other 4 words, I can do no more than say you'll have to take 5 your own view as to what steps you want to take in 6 relation to your proposals. I'm sorry I can't go 7 further. 8 A. If I was sitting where you're sitting, sir, that's 9 probably the answer I'd have given me. 10 LORD JUSTICE LEVESON: Well, good. 11 MR JAY: May we move seamlessly onto Lord Hunt before we 12 take our break? 13 LORD JUSTICE LEVESON: Certainly. Thank you. 14 LORD HUNT OF WIRRELL (recalled) 15 Questions by MR JAY 16 MR JAY: Lord Hunt, you're returning to give evidence so 17 you're still under the oath you gave -- I think it was 18 31 January. 19 You kindly provided us with a further witness 20 statement, which runs to best part of 50 pages. You've 21 signed and dated it. It's dated 8 June. Is this your 22 formal evidence for this module of our Inquiry? 23 A. Yes, it is. 24 LORD JUSTICE LEVESON: Lord Hunt, thank you very much. You 25 also, as the previous witness, have obviously done an</p> <p style="text-align: center;">Page 41</p>	<p>1 create such a new body with a fresh start and it's just 2 appropriate, I think, to recognise the distance that the 3 press has come, albeit, of course, faced by unacceptable 4 and disgraceful behaviour by a comparatively small 5 number of journalists than others. 6 Q. You made the point in those opening remarks and you pick 7 up on the same points -- or one of the points you've 8 made in paragraph 8 of your statement and you say there 9 that you don't believe true self-regulation has ever 10 really been attempted, at least so far as the press is 11 concerned. Therefore the system which we're looking at 12 is the first occasion on which regulation has been 13 attempted. Would you agree though that over the last 20 14 years or so -- or nearly 20 years -- the press have been 15 calling the present system a system of regulation? 16 A. That's a matter for others. Certainly I never saw it 17 and I think at my last appearance, when you asked me to 18 give evidence, I did say that I had said at the outset 19 that I did not believe the Press Complaints Commission 20 had any regulatory powers and I was again surprised to 21 find that virtually everyone agreed with me, including 22 those within the PCC. Although they play a key role in 23 dealing with complaints, it was never as part of 24 a regulatory structure. 25 LORD JUSTICE LEVESON: In those circumstances, do you think</p> <p style="text-align: center;">Page 43</p>
<p>1 enormous amount of work on the proposal that you wish to 2 discuss, and I'm grateful to you. 3 A. Thank you. 4 MR JAY: Lord Hunt, can we be clear where we are in terms of 5 the current state of play? In paragraph 2 of your 6 statement, you refer to a comprehensive process of 7 internal consultation with the staff of the PCC and also 8 your fellow commissioners. Not everything that follows 9 bears their imprimatur or carries their hearty 10 endorsement. We understand that. 11 Have you been in consultation with proprietors and 12 editors and if so, what have been the results of that 13 process? 14 A. Yes, I have. I was pleasantly surprised on 15 December 15 that when asked whether there were any of the editors or 16 publishers who disagreed with the initial proposal, 17 no one put up their hand, and I do believe -- and 18 I think particularly at the moment perhaps I ought to 19 stress -- that since I started on this job, as 20 I describe it, the independent chairman of an 21 independent body, I do believe that the press have come 22 a considerable way, first of all to accept the idea of 23 a regulator, in my view for the first time ever; 24 secondly, a regulator with teeth and the ability to 25 fine; thirdly, to bind themselves under contract to</p> <p style="text-align: center;">Page 42</p>	<p>1 that anybody who sought to describe the PCC as 2 a regulator was simply misleading everybody? 3 A. I think they -- I'm speaking as a lawyer with 4 a speciality in regulatory matters. I don't see it as 5 a regulator, but I can understand other people being 6 under the expression that it was. I'm not sure we ever 7 defined "regulation" with any great skill. 8 MR JAY: In terms of the attributes of any system of 9 regulation, properly so-called, you would want to see 10 a proper complaints system with sanctions; is that 11 correct? 12 A. Yes. The original proposal to which I referred when 13 I last gave evidence was to have two arms: a standards 14 and compliance arm alongside a complaints and mediation 15 arm, but with the flexibility perhaps to embrace 16 a further third arm, which I think has been described as 17 an arbitral arm. 18 Q. Indeed, indeed, and the other attributes of a system of 19 regulation properly so called is that it needs to be 20 independent of the pods it's regulating; is that right? 21 A. Yes. I feel that very, very strongly indeed. To have 22 authenticity as well as influence and ability to 23 regulate, the regulator has to be independent, and what 24 I've sought to do in my statement is to stress that 25 I certainly have taken, nor do I now take, any push or</p> <p style="text-align: center;">Page 44</p>

<p>1 steer from the industry or anyone who appointed me on 2 how I should proceed. What I tried to be is the 3 independent chairman of an independent body with a blank 4 piece of paper to work out how I would suggest that an 5 appropriate regulatory structures should be fashioned. 6 And I hope my ideas have been helpful to this Inquiry, 7 but I now very much wait to hear what this Inquiry 8 concludes.</p> <p>9 Q. What would you, from your experience to date as an 10 independent regulator, want to see changed in the 11 proposal to deliver the best quality independent 12 regulation?</p> <p>13 A. Well, that's my 47-page statement. Many attributes, 14 I think, have to be embraced if we really want to pass 15 that test of an independent regulatory structure.</p> <p>16 Q. Well, the proposal is what we see in your 17 47-page statement. It's whether there are any changes 18 you would want to make to that proposal to deliver the 19 best quality independent regulation from the perspective 20 of a lawyer who has plenty of experience to date as an 21 independent regulator. Do you see that?</p> <p>22 A. Yes. First and foremost, I would want to see 23 independent people. I find it very difficult to decide 24 how to define an independent person, and I've had that 25 discussion with many people, but I think I conclude it</p> <p style="text-align: center;">Page 45</p>	<p>1 think it has not been followed but certainly Article 10, 2 clandestine devices and subterfuge -- what I think you 3 may be referring to were in direct breach of clause 10. 4 Equally on misleading, which has been another subject, 5 again in breach of clause 1. This is not a static 6 document, but it's recently been improved, particularly 7 by now setting out that where the public interest has 8 been discussed and accepted as a reason for breaching 9 the code, there must be a trail as to how and with whom 10 that was established at the time. That only came in on 11 1 January, so I think there has been a wish continually 12 to improve the code.</p> <p>13 Q. That wish has existed over the last 20 years, but 14 admittedly with perhaps greater appetite in recent times 15 than in more ancient times, yet we still have the 16 position now where the culture, practices ethics and of 17 the press said by some to have been found wanting. The 18 question is: how and why is it we find ourselves in that 19 position, notwithstanding what you've read out in the 20 code?</p> <p>21 A. Because I think we need a regulator.</p> <p>22 Q. In terms of the mix then between independent people who 23 are outside the press and people within the press who 24 will meet the self-regulatory aims of the 25 organisation -- because I suppose you say without having</p> <p style="text-align: center;">Page 47</p>
<p>1 must be someone of independent mind, who doesn't have 2 history or baggage or conflicts of interest. So it must 3 be truly independent, and independent-led. 4 But equally to be a self-regulatory structure, it 5 must draw its strength from knowledge and expertise 6 within the industry combined with that independent 7 element. But equally it must have sanctions, it must 8 seek to ensure that its conclusions are adhered to, but 9 above all, I think any new structure must change the 10 culture -- the culture and ethical standards of the 11 press. I think we have a very good basis in the 12 Editors' Code, which starts off with the words -- which 13 are part of the code: 14 "All members of the press have a duty to maintain 15 the highest professional standards." 16 It goes on in the preamble to refer to the most 17 ethical standards, and certainly in all the discussions 18 I've had with victims, groups and people throughout the 19 industry, there is a wish to see the culture and ethical 20 standards of the press improved and strengthened.</p> <p>21 Q. Although that code has been in being for over 20 years 22 now and has not brought about the cultural changes 23 you've referred to, self-evidently, otherwise we 24 wouldn't be here. Why do you think that is?</p> <p>25 A. Well, I want to take you through the areas where you</p> <p style="text-align: center;">Page 46</p>	<p>1 people from within the press, the organisation, the 2 regulator cannot by definition by self-regulatory -- how 3 do you see that balance being met in terms of two 4 important areas of the new system: first of all, the 5 editors committee -- or the Code Committee, pardon me -- 6 where there are a majority of serving editors still 7 under the new system, and the complaints arm, where 8 there are a minority of serving editors? How and why is 9 that desirable?</p> <p>10 A. Well, the great value of editors is that they are 11 dealing with the situation as it is, right at the heart 12 of the industry, and they have a valuable input. But 13 I concluded that rather than try and bring the Editors' 14 Code Committee within the structure of the new 15 independent self-regulatory regime, it is better for 16 them to continue with their work on the Editors' Code 17 Committee, accepting as they now have that there should 18 be a lay element. But within the regulatory structure, 19 the board which Lord Black has been referring to, the 20 trust board, that will not have anything other than 21 a majority of independent people on it, and that will be 22 the key decisionmaker in some of the areas that we've 23 been talking about.</p> <p>24 Q. The complaints arm will have serving editors, won't it?</p> <p>25 A. Yes, and speaking as the chair of the Press Complaints</p> <p style="text-align: center;">Page 48</p>

<p>1 Commission, we find that everyone -- all 17 of 2 the Commissioners who sit to adjudicate on complaints -- 3 does put everything at the door before they come in and 4 certainly the editors that I've heard speak are as 5 critical often of journalists as the independent 6 members. The discussions do not divide between 7 independent members and editorial members. It's 8 a valuable discussion with no prediction as to where 9 people are coming from but a united consensus on where 10 we should be going. 11 Q. The issue may be as much one of perception than anything 12 else, but would you agree that it's important if one 13 wants to have a system which is seen to be independent 14 that one avoids, if at all possible, having editors 15 judging in their own cause, because although naturally 16 they recuse themselves from their own cases, as it were, 17 they're nonetheless adjudicating on a system which 18 concerns them because the decisions may have an impact 19 on their own cases in the future. 20 A. Yes. It's a perception which has to be met head on. 21 When I was given the task of working up the right 22 regulatory structure for solicitors and barristers in 23 the legal services bill -- and indeed by the Law 24 Society -- there was a view that solicitors and 25 barristers should not be involved in adjudicating on Page 49</p>	<p>1 individually complete a form to say that they ..." Now, 2 that's just 60 editors in one very small part of what 3 we're talking about. I don't think the number of 4 editors is a key factor. It's the decision-makers that 5 I've been seeking to see at the publisher level, who 6 have a whole range of editors. 7 Now, of course, the large newspapers do have 8 comparatively few, but regional, local newspapers, there 9 are huge numbers of editors, and I find with the local 10 and regional newspapers in particular that they do want 11 the editors to be involved, because at the end of the 12 day quite often the editor will be one of the few people 13 employed in that newspaper or periodical. 14 LORD JUSTICE LEVESON: There's a problem, isn't there, 15 because whereas you might have no difficulty at all in 16 having the editor of the Southampton Echo sitting on 17 a decision involving the Yorkshire Post, if that would 18 ever happen -- I immediately make it clear that I'm 19 casting no aspersions on the Yorkshire Post -- the 20 position of the very, very large newspapers is rather 21 different, and whether it's News International or 22 Associated Newspapers or Trinity Mirror, enormous 23 players in the field are quite different from the other 24 group of editors to whom you've just referred. 25 A. I agree, and with regard to solicitors, there are 80,000 Page 51</p>
<p>1 complaints. But actually, I think in the long run 2 everybody decided there has to be a balance. 3 LORD JUSTICE LEVESON: But there's an enormous difference 4 there, isn't there? Because there are 40,000 solicitors 5 and there are, I don't know, several thousand 6 barristers, I can't remember, 14,000, 15,000 barristers, 7 and therefore it's not difficult to find a barrister or 8 a solicitor who's not at all affected by the subject 9 matter of a particular concern. You're talking about 10 30, 40 editors. 11 If you said to me there ought to be working 12 journalists, those working in the industry, then the 13 parallel is much, much stronger, but if you say, "No, we 14 are going to take this comparatively small group of very 15 powerful people and we're going to then make them 16 judges", isn't that different? I mean, I'd be 17 interested for your help. 18 A. I think my figures are 118,000 solicitors and 10,000 19 barristers, but the point is still as valid. 20 LORD JUSTICE LEVESON: Oh well, whatever. You make it even 21 stronger for me then. 22 A. Yes, if I've got it right. 23 When I went to see the chief executive of IPC 24 Media -- I think I've got the name right -- she said to 25 me: "Are you saying that my 60 editors must each Page 50</p>	<p>1 of those 118,000 solicitors who are in very small little 2 firms, but if you just take the magic circle of five 3 firms, those chief executives have a huge amount of 4 influence within the system. So I'm not sure that there 5 aren't too many lessons to be learnt from comparisons of 6 that nature. What I'm trying to do all the time is to 7 reflect a balance between the regional and local 8 newspapers, between the national newspapers, between 9 online and between the magazine and publications 10 industry generally. The regulator that's going to 11 emerge must reflect all these elements and I think to 12 exclude or bar editors would be a step backwards. 13 MR JAY: In paragraph 9 of your statement, Lord Hunt, you 14 say -- this is page 00801: 15 "Self-regulation can be effective only in an 16 industry that possesses the necessary ethos, structures 17 and systems to ensure that an agreed level of standards 18 is maintained." 19 Do we, at the moment, Lord Hunt, have an industry 20 which, in all its manifestations, possesses that 21 necessary ethos, structures and systems? Do we 22 currently have such an industry? 23 A. In the main, yes, but there are parts of the industry 24 that have been found wanting. And indeed, the most 25 critical people I meet are those in the industry, Page 52</p>

<p>1 particularly journalists and editors, who really are 2 rather ashamed of what some parts of their industry have 3 done and want to see it put right, which is why 4 I believe there is such a consensus now on the need to 5 move forward, subject to what this Inquiry may conclude.</p> <p>6 Q. Isn't it the premise of paragraph 9 -- to this extent we 7 can agree with it -- that if we were to have an industry 8 that did possess the necessary ethos, structures and 9 systems to ensure that an agreed level of standards was 10 maintained, then self-regulation would be effective, but 11 given that we don't have an industry which currently, in 12 all its manifestations, possesses that necessary ethos, 13 et cetera, self-regulation is unlikely to work?</p> <p>14 A. No. I believe that self-regulation can and will work, 15 provided you have the necessary agreement on the right 16 way forward and provided you have a regulatory structure 17 which means something.</p> <p>18 Q. How will the new regulatory structure ensure that the 19 right internal checks and balances are in place?</p> <p>20 A. This is probably one of the key features, so far as I'm 21 concerned, that I have found on the part of the 22 publishers a wish and a willingness to sign up to 23 a system which puts the responsibility for the necessary 24 ethos, structures and systems fairly and squarely in 25 their area of responsibility. And I greatly welcome</p> <p style="text-align: center;">Page 53</p>	<p>1 what extent this Inquiry has heard evidence from media 2 or press historians, but certainly several members of 3 the Calcutt committee have told me that they're not 4 quite sure why they didn't consider this, because it 5 does seem to be an option that ought to be on the table 6 and that it is now is on the table gives us a real 7 opportunity for the first time to put things right.</p> <p>8 Q. The earlier commissions and committees you're referring 9 to were all thinking in terms of a regulator which had 10 some form of a statutory underpinning. They didn't 11 think in terms of express commercial contracts maybe 12 because the existing system they were looking at was 13 based on implied contracts.</p> <p>14 But why isn't the system of commercial contracts yet 15 another variant of the last-chance saloon? Why 16 shouldn't we move straight to a system which has been on 17 the table in various forms now for over 60 years, namely 18 a system which has some form of statutory underpinning?</p> <p>19 A. I do think it's a common misunderstanding about the '62 20 Royal Commission, so I brought with me the extract from 21 command 1811, which is the September '62 Royal 22 Commission report, where they say in paragraph 325, 23 whilst detailing the recommendations -- they then go on 24 to say: 25 "We do not think that the absence of an enabling</p> <p style="text-align: center;">Page 55</p>
<p>1 that. I find it interesting to note that perhaps that 2 hadn't always been the case, but when I put it to 3 publishers, that they should have an internal system of 4 standards setting, compliance, complaints handling and 5 mediation, they accepted it, but very few had actually 6 put it into effect.</p> <p>7 Q. Given that Sir David Calcutt's report was, as it were, 8 in the last-chance saloon and reviewing the history 9 since 1947 there have been three, if not four occasions 10 before Sir David Calcutt where opportunities were 11 missed, why should the press, which still exhibits, on 12 your account, deficiencies as regards the culture, 13 practices and ethics, be given a further last chance?</p> <p>14 A. I don't think it's ever been given a last chance. I've 15 had the opportunity of meeting and discussing with most 16 of the members who are still alive of the Calcutt 17 committee and asking them about the recommendations of 18 the 1949 Commission and indeed the recommendations of 19 the 1962 Commission, and I was surprised to find that 20 the whole idea of a contractual basis wasn't raised. So 21 no one thought up what seems to me to be an obvious 22 course of action, that the publishers should contract to 23 create a proper regulator.</p> <p>24 Now, that is in effect carrying out some of the 25 recommendations of the 1949 Commission. I'm not sure to</p> <p style="text-align: center;">Page 54</p>	<p>1 statute need necessarily be fatal to the activities of 2 such a body."</p> <p>3 And continue, I quote: 4 "Much of its power could rest upon a contractual 5 basis." 6 So the '62 Royal Commission did actually suggest 7 a contractual basis but no one seems to have picked that 8 up.</p> <p>9 MR JAY: Is that a convenient --</p> <p>10 LORD JUSTICE LEVESON: Yes. We have in fact seen the Royal 11 Commission. Thank you.</p> <p>12 (3.25 pm)break 13 (A short break) 14 (3.35 pm)</p> <p>15 LORD JUSTICE LEVESON: Yes.</p> <p>16 MR JAY: I think, Lord Hunt, following on what you said 17 before we broke for our short break, there should really 18 be two saloons. The saloon which has been called 19 "last-chance saloon" should be called "penultimate 20 chance saloon" and your contracts are last-chance 21 saloon, and if that doesn't work, where are we then?</p> <p>22 A. I think I made a terrible error last time in referring 23 to the sword of Damocles. I'd forgotten that Cicero was 24 using that as an example of how there can be no 25 condition of happiness where there is still some fear</p> <p style="text-align: center;">Page 56</p>

14 (Pages 53 to 56)

<p>1 hanging above you, and I suppose in a way that's always 2 going to be there. It's just I don't think anyone has 3 really tried an internal regulatory system policed, 4 monitored and enforced by a professional oversight body. 5 Perhaps this is too legalistic on my part, but I don't 6 think it's been tried. Now, whether you put that in 7 a saloon or out in the public arena is a matter for your 8 judgment, but I think that the key test here is the 9 test: will this restore trust and confidence on the part 10 of the public?</p> <p>11 Q. You don't think the public would say, "Well, this, in 12 effect, is a cop-out. We've had similar palliatives 13 over the last 60 to 70 years and they've failed. We 14 have reached the end of the road and that means some 15 form of statutory under pinning"? You don't think that 16 would be the likely public response to anything less 17 than that from this Inquiry, wouldn't you say?</p> <p>18 A. I think there is pride in the British press amongst the 19 public, but outrage at the way some parts of the press 20 have behaved, but I don't think you could summarise the 21 view of the -- I was taken -- if I may, for a moment, 22 just give one example. I was taken a little bit by 23 surprise -- on 21 June, I had the honour to be 24 introduced to Aung San Suu Kyi, who is taking her seat 25 in the Burmese Parliament at the moment and I was</p> <p style="text-align: center;">Page 57</p>	<p>1 A. Yes.</p> <p>2 Q. "... requiring journalists to behave responsible within 3 certain generally observed behavioural norms and 4 precepts."</p> <p>5 So I suppose the issue is: what comes first? If 6 journalists did adhere to those behavioural norms and 7 precepts, then it may be more arguable that 8 self-regulation is the appropriate regulatory system, 9 but if journalists are falling too far short of 10 appropriate behavioural norms and precepts, then it 11 might be said that something stronger is required. 12 Would you agree with that analysis?</p> <p>13 A. Yes, but at the moment I'm suggesting the "something 14 stronger" is for the first time ever a self-regulatory 15 structure chair by an independent person with an 16 independent majority. I don't think we need 17 a cumbersome, slow, expensive press law. We need a sort 18 of -- as I say, a professional oversight monitoring and 19 enforcing the standards that I believe the vast majority 20 of journalists accept.</p> <p>21 Q. In paragraph 13 of your statement, Lord Hunt, you refer 22 to the formidable corpus of legal and regulatory 23 structures and strictures. Are you conceding there that 24 a considerable degree of statutory regulation already 25 exists?</p> <p style="text-align: center;">Page 59</p>
<p>1 introduced to her as chairman of the press in the United 2 Kingdom. She looked me straight in the eye and said, 3 "You must be so proud." 4 I suddenly thought: yes, I am very proud. But that 5 pride doesn't mean I'm oblivious to the activities of 6 a small minority, but I do think there is still that 7 pride.</p> <p>8 Q. So you feel that the public would wish to give the press 9 another chance? Is that it?</p> <p>10 A. Yes, so long as it's a free and responsible press, not 11 just a free press but a press that accepts its 12 responsibilities, and I've found a willingness -- and 13 I think Lord Black epitomised that, and I stress again, 14 as I said in my first response: I do believe the press 15 has come a long way under Lord Black's leadership. He's 16 now putting forward a potential solution, subject very 17 much to what this Inquiry may decide.</p> <p>18 Q. The issue of responsibility is one you take up quite 19 clearly in the last sentence of paragraph 9 of your 20 statement at page 00802: 21 "Self-regulation requires the industry to recognise 22 that the still considerable freedoms it enjoys are 23 a privilege, not an unassailable right ..." 24 So freedom of the press is not absolute, you're 25 saying there.</p> <p style="text-align: center;">Page 58</p>	<p>1 A. Not statutory regulation, but a considerable amount of 2 caselaw and statute law exists of which journalists have 3 to be aware. Last time I did refer to McNae's 4 "Essential Law for Journalists" and I've seen many 5 volumes on privacy law, various decisions of various 6 courts which do set out a number of safeguards for the 7 public, of which journalists have to be aware.</p> <p>8 LORD JUSTICE LEVESON: Why is it stronger or weaker if it's 9 one way or the other? Isn't it just appropriate that we 10 have a system of regulation that encourages the good, 11 discourages the bad, and venerates the proper expression 12 of free speech?</p> <p>13 A. Yes.</p> <p>14 LORD JUSTICE LEVESON: Providing we achieve those ends, 15 whether it's come through a statute or contract or 16 because everyone's said, "Truly we will this time", why 17 does it matter?</p> <p>18 A. Oh, I do disagree, sir, if I may. I think as soon as 19 you start to move towards a statutory regulator -- I do 20 recall, sir, last time you referred me to the 21 Constitutional Reform Act and in particular clause 3, 22 subsection 6, saying the Lord Chancellor must have 23 regard to the need to defend the independence of the 24 judiciary. If I recall, sir, you put to me: why can't 25 we have a similar provision so far as the independence</p> <p style="text-align: center;">Page 60</p>

15 (Pages 57 to 60)

<p>1 of the press is concerned? If I may continue, I have 2 spent some time reading back the debates which occurred 3 over the independence of the judiciary. And what effect 4 did it have? Because the very following year, in 2006, 5 the Home Secretary, John Reid, attacked a judge pretty 6 severely. Vera Baird, who was a minister in the 7 Department of Constitutional Affairs, attacked, on many 8 questions, the judge on particular.</p> <p>9 LORD JUSTICE LEVESON: I don't think she was. She might 10 have been Solicitor General.</p> <p>11 A. At the time, on 16 June 2006, she was Parliamentary 12 Undersecretary of State at the DCA. It was before she 13 was promoted, and she said, "I'm critical of the judge 14 for three reasons", and she set out her three. Judge 15 Cutler, Secretary of the Council of HM Circuit Judges, 16 said, "Why is no one speaking on behalf of the judges?" 17 And then if one looks then later on 18 July, the 18 Lord Chief Justice condemned the attacks on judges as 19 intemperate, offensive and unfair. So what effect did 20 that provision have?</p> <p>21 LORD JUSTICE LEVESON: Well, I'll tell you the effect it 22 has, that actually what you've just identified is the 23 value of free speech, whatever the judges might think 24 about it. But the effect that it did have is that 25 nobody can say that a statute -- statute -- has cut down</p> <p style="text-align: center;">Page 61</p>	<p>1 LORD JUSTICE LEVESON: Well, if it means: are you going to 2 be able to stop ministers complaining about what's 3 written about them in the press, I think not, in the 4 same way that we've been unable, if we've even tried -- 5 which I doubt -- to stop ministers complaining about 6 judicial decisions. We've complained that the context 7 of our decisions is not correctly identified and 8 therefore people get the wrong impression, but free 9 speech is there to correct all that.</p> <p>10 The purpose of the statute is to cope with what 11 I understood was the concern about creeping legislation. 12 Once you've started a bit, then it's easy to do a bit 13 more, and all of a sudden what looks benign, by creeping 14 legislation, becomes something that's not at all benign. 15 Therefore I'm saying -- or I'm asking; I'm not deciding, 16 as yet -- the equivalent of section 31 of the 17 Constitutional Reform Act, and 36 and all the rest of 18 them, if applied to the press underlines a Parliamentary 19 commitment to a free press which presently does not 20 exist. That's the point.</p> <p>21 A. Yes, I readily understand, and if one seeks to try and 22 entrench the independence of the press, one is really 23 fighting with, I suppose in many ways, amendment 1 to 24 the -- the First Amendment to the American constitution. 25 If one reads the First Amendment, which is, I suppose,</p> <p style="text-align: center;">Page 63</p>
<p>1 the independence of the judiciary, whatever comment 2 politicians might make about it. And your concern, as 3 I understand it -- and it may be more than 4 philosophical -- Lord Black's was very philosophical. 5 But your concern is that a statute, once it's started to 6 even talk about providing a framework within which the 7 press can be regulated, is itself impacting on the 8 freedom of the press. That, I understand, is the 9 argument. If I've misunderstood t please correct me.</p> <p>10 A. I think, sir, what I was referring to was: what effect 11 did this statute have on, say, the Lord Chancellor? 12 Because -- we're just looking at it in this particular 13 context but there are many others I could quote. The 14 Lord Chancellor, in giving evidence to the 15 Constitutional Affairs Committee on 4 July 2006, said 16 that this particular case "has had an impact on 17 undermining confidence in the judiciary". 18 This is the Lord Chancellor. I just feel that when 19 you move from the independence of the judiciary, which 20 I uphold and would fight to the death to uphold, to 21 independence of the press, you move into a completely 22 different structure. If it doesn't work for the 23 judiciary in the way that I would like it to, it's 24 hardly going even to get off the ground in respecting 25 the independence of the press.</p> <p style="text-align: center;">Page 62</p>	<p>1 parallel to the sort of statutory underpinning of the 2 independence of the press, it is -- it goes far further, 3 and I just think as soon as you open this arena for 4 Parliamentary scrutiny and control through legislation, 5 primary and secondary, you open up the opportunity, 6 really, of confusing a quite simple problem that has 7 needed -- like a hole in the head needs statutory 8 regulation and does desperately need some form of 9 regulation which it's never had.</p> <p>10 LORD JUSTICE LEVESON: Well, I understand article 1 does go 11 further and raises all sorts of other different issues.</p> <p>12 MR JAY: On that argument, I think, Lord Hunt, one would 13 never have any form of statutory regulation because it 14 would always be wrong in principle, wouldn't it?</p> <p>15 A. No, I think the press is -- as we remind ourselves every 16 day, in the UK is pretty unique. I don't think there's 17 a similar press regime anywhere else in the world, which 18 criticises ministers, judges, everyone else, and long 19 may that last, but let us have a change in the culture, 20 a change in the ethics and the standards of the press, 21 which I think the overwhelming majority of the press 22 want to sign up to.</p> <p>23 Q. I think you're agreeing with me then that on this line 24 of argument, one would never have a system of statutory 25 regulation in whatever form, since it would always be</p> <p style="text-align: center;">Page 64</p>

<p>1 inimical to the principles you've just expounded. 2 Wouldn't that be so?</p> <p>3 A. Well, in the Human Rights Act, the Data Protection Act, 4 there is reference to a code. It may well be -- and 5 I introduced it last time and you'll be hearing from 6 Professor John Horgan a little later that week -- it may 7 well be that the defamation bill could have 8 a recognition of a code, or indeed, as in the European 9 Court's judgment in the Mosley case, specific reference 10 to the Editors' Code.</p> <p>11 That, to my mind, is not a statutory regulatory 12 system, which, in the case of the press, I wouldn't 13 advocate but I await the decision of this Inquiry.</p> <p>14 Q. Can I ask you, please, about paragraph 20 of your 15 statement now. I haven't asked you about bills before 16 Parliament mutating and ending up having damaging 17 consequences. You told us a bit about that on the last 18 occasion, but out of fairness to you, is there anything 19 you wish to add to that point?</p> <p>20 A. Except just to point out that secondary legislation does 21 require primary legislation. It is now accepted that 22 Parliament should not give the executive unfettered 23 power to introduce secondary legislation, so every 24 regulation or every element of secondary legislation has 25 to have a derivation and an authority in an Act of</p> <p style="text-align: center;">Page 65</p>	<p>1 LORD JUSTICE LEVESON: Could I ask you this question, 2 though: have these extended beyond people who've given 3 evidence to the Inquiry?</p> <p>4 A. Yes, sir, because I have met groups and individuals who 5 have not given evidence to the Inquiry. But I did make 6 it my business to meet as many as I possibly could of 7 the victims who have given evidence.</p> <p>8 LORD JUSTICE LEVESON: But you make a very important point. 9 It would be quite wrong for anybody to think that the 10 people who have given evidence to the Inquiry are the 11 only ones who have complaints against the press. There 12 are out there a large number of other people with 13 similar complaints, which we could have -- they might 14 tell different stories, so we could have filled this 15 Inquiry with days and days more. Do I correctly 16 understand what you're saying?</p> <p>17 A. Yes, sir. In fact, since I gave evidence to this 18 Inquiry, I think we have dealt with an enormous number 19 of complaints within the Press Complaints Commission and 20 I've also met groups who have given what they believe to 21 be evidence to show that there are groups in society and 22 groups generally who are not treated properly by the 23 press. I found discussions with, say, the Samaritans to 24 be enormously helpful in understanding the importance of 25 listening to groups like the Samaritans, particularly</p> <p style="text-align: center;">Page 67</p>
<p>1 Parliament, and I thought that perhaps those who 2 advocate "Well, it can all be dealt with by secondary 3 legislation" do not sometimes understand that the 4 Henry VIII principle of allowing the executive to do 5 whatever it likes is inappropriate and would not be 6 accepted.</p> <p>7 LORD JUSTICE LEVESON: Of course one couldn't, and the great 8 value of primary legislation is that it can define 9 exactly what is permitted or not permitted in secondary 10 legislation.</p> <p>11 A. Yes. Yes.</p> <p>12 LORD JUSTICE LEVESON: I understand that.</p> <p>13 MR JAY: Paragraph 20, where you refer to your time having 14 been spent meeting victims who've suffered at the hands 15 of the press. You say you've been saddened and 16 sometimes appalled by some of the stories you've heard 17 and then you say:</p> <p>18 "I'm sorry to say in some of the most high-profile 19 cases, the treatment they received from the PCC also 20 fell short of what a genuine regulator could, should and 21 would have done in a similar situation."</p> <p>22 I'm not going to give examples. Some of your 23 conversations may have been confidential but I think we 24 can imagine the sort of individuals you spoke to who 25 gave you those views.</p> <p style="text-align: center;">Page 66</p>	<p>1 when we look at the Internet and what is appearing on 2 the Internet at the present time and we have to work out 3 ways to overcome the dangers that they highlight.</p> <p>4 LORD JUSTICE LEVESON: That might also mean not merely 5 looking at what's happening on the Internet but looking 6 at what groups have to say about the way they are 7 portrayed in the press.</p> <p>8 A. Yes.</p> <p>9 MR JAY: You tell us that the victims you've spoken to by 10 and large have not lost faith in the press. Have they 11 lost faith in the PCC as currently constituted?</p> <p>12 A. Yes, they've told me that. Although the 260 complaints 13 we've dealt with since January -- I've looked at the 14 returns, because we ask everyone to say what they felt, 15 and over 80 per cent of those who have had their 16 complaints dealt with have expressed satisfaction with 17 the way in which their complaint has been dealt with.</p> <p>18 LORD JUSTICE LEVESON: Could you explain to me by what you 19 mean by "dealt with"? Does that include those who have 20 complained and you've directed them back to the 21 newspaper and then mediated something, or is it only 22 those who actually get through to the stage of 23 adjudication?</p> <p>24 A. No, I'm talking about all complaints, and generally 25 speaking, the majority of complaints are resolved</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 through mediation, and quite often the complainant will 2 be satisfied that their complaint has been dealt with 3 properly without the need to press for adjudication. 4 LORD JUSTICE LEVESON: What proportion of those people who 5 actually complained were rejected as not falling within 6 the grounds of the code? Well, how many more people 7 were there, because they're obviously not included in 8 your number. 9 A. I would want to ask, but as I understand it, a very 10 small number would be turned away, because at the 11 moment, without this new regulatory system and without 12 being satisfied, as the new regulator would have to 13 satisfy themselves, that there are properly internal 14 procedures for dealing with complaints, we do not brush 15 aside complaints and direct them towards the editor 16 without taking them up in the first place. That is 17 something which I think would be new and would be 18 welcome, and indeed the publishers have said that they 19 would want to make sure that there was a proper system 20 of dealing with complaints within each of their titles. 21 As I understand it -- just take one section -- there 22 are 15,000 editors of regional and local newspapers and 23 magazines, so we are dealing with a huge number of 24 publications. Generally speaking, I'm sure that most of 25 them would prefer to deal with the complaints directly Page 69</p>	<p>1 into our defamation bill. It does achieve universal 2 coverage. The self-regulation itself, they believe, is 3 a sufficient incentive and I see potential benefits in 4 having similar legislation here linking a Reynolds-style 5 defence to membership of a recognised regulatory 6 structure but I wouldn't advocate a perfect replication 7 here of the Irish Press Council or the Defamation Act 8 2009. 9 Q. We'll look at the detail of that as we go through your 10 evidence, Lord Hunt. Can I ask you, please, about 11 paragraph 26 of your statement where you start to give 12 a brief overview of your recommendations. You point out 13 the current system is non-contractual or rather operates 14 on the basis of implicit contracts -- that analysis is 15 no doubt correct -- save for an informal system that's 16 endured surprisingly well. I put this to you: if the 17 suggestion is the publishers would be willing to sign 18 a contract and be compelled into doing things that they 19 would not otherwise agree to, why would they do that? 20 A. There is a willingness to set up, for the first time, 21 a proper regulatory structure. I can't really speak as 22 to whether that willingness was there before, had the 23 notion been put forward, but certainly in the past, even 24 though there may or may not have been an implied 25 contract -- I personally don't think there was -- there Page 71</p>
<p>1 themselves without first having to be made aware by the 2 PCC that a complaint has been lodged. 3 LORD JUSTICE LEVESON: 15,000 editors? 4 A. I asked before, that whereas the small number that was 5 earlier quoted may be the number of editors in major 6 newspapers, there are, as I demonstrated through 7 IPC Media, 60 editors there. There are hundreds and 8 thousands of editors of smaller publications, at 9 local/regional papers and magazines. 10 MR JAY: You travelled to Ireland in early May of this year. 11 You say you learnt some valuable lessons there. Could 12 you summarise, please, Lord Hunt, the lessons that you 13 did learn from that visit? 14 A. Well, you're quite right. I found it fascinating and 15 I have established a very good working relationship with 16 Professor John Horgan, who was present at each of my 17 meetings there, and I found that there are some lessons 18 to be learned from the Irish system, but there are some 19 considerable differences which exist, and I have sought 20 to set those out in my statement. 21 Q. In your own words, could you summarise for us the 22 lessons you learnt and then the differences? 23 A. Well, so far as the Irish system is concerned, the Act 24 itself does lay down certain specifics about the Irish 25 Press Council which I'm not sure would be translated Page 70</p>	<p>1 had been occasions on which several publications have -- 2 in particular at the time of the Calcutt committee's 3 report on privacy, one major newspaper threatened to 4 withdraw from the Press Complaints Commission and were 5 eventually persuaded not to do so, so it's never really 6 been put to the test. 7 So I don't think it's a case of just looking at one 8 large newspaper publishing house; I think one has to 9 look over the whole scene and set up a system where it 10 would not just not be possible for anyone unilaterally 11 to withdraw. 12 Q. Under the new system, enforcement is via court action if 13 necessary. How likely is it that the regulator would be 14 willing to take court action to enforce a contract in 15 this way, and what would the implications be for 16 relations between the regulator and the publishers if 17 such a step had to be taken? 18 A. Well, I -- I -- I have reserved my position on the 19 drafts which have been put forward. I haven't reached 20 any conclusion on the draft contract, the draft 21 regulations, the draft articles, nor have I been asked 22 to do so. I await the view of this Inquiry. 23 One can only speculate as to what the relationship 24 would be in the circumstances you describe. I started 25 off, perhaps too idealistically, in hoping that we might Page 72</p>

18 (Pages 69 to 72)

<p>1 have a short, simple, easy-to-understand contract. 2 That's still, I think, my position. I don't see the 3 need for great, huge, extensive provisions. I want to 4 set up an independent self-regulatory structure which 5 can then work out with the industry the best way 6 forward, rather than being too inhibited by detailed 7 provisions, but I'll very open to any suggestions that 8 may be made on that subject.</p> <p>9 LORD JUSTICE LEVESON: So you've not commented upon the 10 precise details that Lord Black's enunciated to us. 11 You've deliberately not seen that as your role and 12 you've not discussed them with, for example, any of the 13 people that you've been consulting with?</p> <p>14 A. Well, there have been a number of drafts. I saw some 15 early drafts when I again reiterated my wish for 16 a short, sharp, simple, easy-to-understand contract. 17 I haven't given any view on the latest drafts, nor have 18 I seen all of them. I felt it was -- I was hoping that 19 you, sir, would give a view on the right way forward.</p> <p>20 LORD JUSTICE LEVESON: Oh, in due course I certainly shall.</p> <p>21 MR JAY: Can I understand, though, what your preference 22 would have been? You've obviously been able to have 23 a look at the latest iterations of Lord Black's model in 24 terms of the contractual structure, the regulations and 25 the articles of association. Is it your position,</p> <p style="text-align: center;">Page 73</p>	<p>1 A. Well, there's no point if there's disagreement. We have 2 to see agreement across the industry. But I would far 3 prefer it to be on the simple objective of creating, for 4 the first time ever, a self-regulatory structure, shared 5 by an independent trust board, but I recognise that this 6 is the first time we've ever attempted this, and 7 I suppose we'll never know unless we give it a go.</p> <p>8 Q. That may be right, Lord Hunt, but I think my question 9 was more that for whatever reason -- and frankly, I can 10 see for good reason -- we've reached the position now of 11 a quite detailed set of proposals in terms of the 12 contract, the regulations and the articles of 13 association. Having reached that position, is your fear 14 that it's in fact less rather than more likely that 15 everybody will sign up to these proposals because of the 16 level of detail we see in them?</p> <p>17 A. Well, in the last few weeks I've seen virtually all the 18 publishers and they have all expressed a willingness to 19 sign up.</p> <p>20 LORD JUSTICE LEVESON: That's the publishers. You don't see 21 editors?</p> <p>22 A. I see their -- I have concentrated in particular in 23 talking to the publishers. I did, of course, discuss 24 and I still discuss with key editors who take a lead in 25 putting forward views, and the editor of the Independent</p> <p style="text-align: center;">Page 75</p>
<p>1 Lord Hunt, that a shorter, simpler model would have been 2 preferable, therefore giving the regulator and the 3 regulated entities greater leeway subsequently to decide 4 what to do?</p> <p>5 A. Mm, yes, but it is for the industry to come forward with 6 their proposals. I suppose in many ways I set out an 7 agenda in that two-page document. I set out in simple 8 terms the powers that the new independent 9 self-regulatory structure should have. I think it's 10 remarkable that Lord Black has been able to get 11 agreement across the industry, because I am aware that 12 there are differing views in all parts of this great 13 newspaper and magazine industry but I haven't reached 14 a conclusion because I was hoping to receive some 15 guidance, because we are dealing with a completely new 16 area. This is going to be the first time ever 17 a contract-based -- as recommended by Shawcross -- 18 a contract-based regulatory structure is going to be set 19 up.</p> <p>20 Q. Is your fear, though, that if the contractual 21 stipulations and associated regulatory stipulations are 22 very detailed -- as indeed it's fair to say they are in 23 the proposals we've been examining this morning -- it 24 may be less likely that every single entity within the 25 press as a whole will sign up to them?</p> <p style="text-align: center;">Page 74</p>	<p>1 on Saturday asked the public to express their views in 2 his editorial on Saturday. So one must conditionally 3 have discussions, but I was particular concentrated -- 4 if we are to have an internal standards setting and 5 complaints-handling mechanism within every publisher, it 6 must be the publisher who is willing to set that up. It 7 is then for the publisher to decide how the internal 8 structure should work with his or her editors.</p> <p>9 MR JAY: Are you personally satisfied that the detailed 10 proposals which we've seen and scrutinised deliver the 11 best quality independent regulation system?</p> <p>12 A. Yes, because I am advised that it fulfils the objectives 13 which I set out on 15 December. The key area, though -- 14 and I think that is where many people will be looking to 15 this Inquiry for guidance -- is on this third arm, the 16 arbitral arm. Everyone wants to see a quick and easy 17 way of resolving disputes without overoccupying the time 18 of lawyers and courts, but I don't think yet anyone has 19 come forward with the solution. I think people are 20 looking to this Inquiry to give guidance. I think it's 21 much easier to determine standards and compliance and 22 handling complaints, and as you know, I don't think 23 adding compensation to the list of powers of the 24 complaints-handling body would be a good idea because 25 I want to see complaints continue to be mediated.</p> <p style="text-align: center;">Page 76</p>

<p>1 Q. The issue in relation to the arbitral arm, as you well 2 know, is it requires some form of statutory 3 underpinning, that commercial contracts by themselves 4 are insufficient. You appreciate that?</p> <p>5 A. Yes, and Lord Lester's bill originally did set out a way 6 in which that could be done. The government have not 7 yet incorporated the wording that Lord Lester of Hearne 8 Hill suggested but it may have the opportunity of 9 reconsidering that, particularly when the bill comes 10 before the House of Lords later this year.</p> <p>11 Q. Paragraph 27 of your statement. You refer in the second 12 bullet point to funding. Can I ask you please about the 13 relationship between the industry funding body and the 14 trust board of the regulator. Do you feel that that 15 provides sufficient autonomy for the trust to do its job 16 properly?</p> <p>17 A. I don't really want the regulator to be involved in the 18 detail of how the funding is allocated between 19 individual publishers, individual newspapers and 20 magazines and online. I think for the regulator to have 21 cognisance of that would lead to different pressures 22 being put on the regulator. I would far prefer the 23 independent self-regulatory mechanism to be funded but 24 not to go into detail about how that funding should be 25 arrived at. That will be a matter for the industry.</p> <p style="text-align: center;">Page 77</p>	<p>1 Q. That goes back to an earlier point. It assumes that 2 there's already a culture change within all the relevant 3 press organisations to ensure that both internal 4 governance is improved but that there are fewer breaches 5 of standards to enable internal systems to deal with 6 them. Wouldn't you agree with that?</p> <p>7 A. Yes. Certainly I've not come across anyone who has told 8 me that it's impossible or too difficult to organise the 9 necessary internal standards compliance and 10 complaints-handling. There are differing views as to 11 how independent the complaints-handling would be, but 12 certainly I've found, especially in the local and 13 regional press, that they would far prefer that 14 complaints are dealt with direct with the complainant 15 and resolved quickly.</p> <p>16 Q. Can I ask you, please, about paragraph 28 of your 17 statement, where you say in relation to the board of the 18 new regulator that you would like to see one or two 19 industry representatives on it but there should be an 20 independent chairman and an independent majority. 21 Lord Black's model has three press representatives on it 22 who are not serving editors. Do you feel that's too 23 many?</p> <p>24 A. Well, there are some differences between Lord Black's 25 proposals and my suggestions. I stand by my</p> <p style="text-align: center;">Page 79</p>
<p>1 Q. So the industry then will have control over the total 2 amount of the pot, would it, Lord Hunt?</p> <p>3 A. No, because, as you know, I have set out in my statement 4 what I think will be the cost of the new structure, and 5 as I understand it, the industry feels able, provided it 6 gets general acceptance, to supply sufficient funds to 7 meet that budget.</p> <p>8 Q. I put the point to Lord Black and I put it to you as 9 well: we know how much the PCC costs at the moment. 10 It's just short of 2 million. The new body will cost 11 2.25 million a year, plus the enforcement pot, which 12 will start at 100,000. Is that really sufficient, given 13 all the extra work which the new regulator is being 14 asked to undertake?</p> <p>15 A. Yes, because I anticipate that the emphasis on internal 16 standard-setting and complaints-handling will result in 17 a more oversight body than presently is constituted. 18 Therefore, you're quite right; there are additional 19 responsibilities in the standards arm, in particular if 20 there is a serious or systemic breach, but the onus of 21 complaints-handling should be much more the 22 responsibility of individual newspapers and magazines 23 than it is at the present time, and I've found there's 24 a general acceptance by the industry that that should be 25 the case.</p> <p style="text-align: center;">Page 78</p>	<p>1 suggestions, but I do believe the outline that 2 Lord Black has put forward is an extremely good starting 3 point, although I've always said that the contract 4 should be as sort and as simple as possible, so that the 5 regulator then has sufficient flexibility to adapt to 6 challenges presented by what is a dynamic and fluid 7 industry. But I certainly don't believe any final 8 contract should be signed until it has been forensically 9 examined by you, sir, and by your team, and I would also 10 like to study it myself to assess its fitness for 11 purpose.</p> <p>12 Q. It's right that there are some differences between what 13 you're proposing and what Lord Black, with the 14 acquiescence or otherwise of the industry, has proposed. 15 I'm just seek to identify the key differences. One 16 difference relates to the number of industry 17 representatives on the trust board. You favour, in 18 principle, a fewer number, don't you?</p> <p>19 A. Yes, and there are a number of other differences. For 20 instance, I think it's vitally important that there 21 should be a whistle-blowing hotline into the new 22 regulatory structure, in particular for someone employed 23 who feels they're being asked to do things which are 24 contrary to the Editors' Code. There should also be an 25 ability within the new structure to discuss points of</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 culture and ethical standards with any part of the 2 industry who wishes to seek advice. I would want to the 3 see, certainly in the early days, as flexible 4 a structure as possible. 5 LORD JUSTICE LEVESON: One of the concerns about which 6 I don't think my memory is letting me down relates to 7 a complaint by some journalists about being asked to 8 proceed in a way which they felt was unethical and being 9 told by the PCC that they had no right to complain. 10 A. Yes. 11 LORD JUSTICE LEVESON: And I suppose that is what you're 12 talking about by the whistle-blowers? 13 A. Yes. 14 LORD JUSTICE LEVESON: But do you have a comment then on the 15 whole question of third-party complaints and the need 16 for significant breaches of the code or substantial 17 public interest? Or do you think that puts it too high, 18 before a third party can complain or a group can 19 complain? 20 A. I'm assured by my colleagues in the PCC that they do 21 listen attentively to any third party who wishes to 22 bring forward a complaint at the present time, but often 23 the complainant may not wish to make a complaint but 24 there is a group or a third party wishing to complain on 25 their behalf. I think that will be a matter which <p style="text-align: center;">Page 81</p></p>	<p>1 MR JAY: Okay. Before we look at other areas of difference 2 between your proposal and Lord Black's proposal, there's 3 one area of similarity. This relates to the appointment 4 of the chair of the trust board. It's toward the end of 5 paragraph 28 of your statement, and you pick it up again 6 in paragraph 71. Your proposal is the same as 7 Lord Black's, although you refer specifically to 8 a shortlist which would be produced independently by 9 headhunters. A panel of four should make the final 10 decision, there would be two independent members and two 11 industry members of that panel, but there should be 12 unanimous decisions. 13 I don't think Lord Black referred to headhunters, 14 but in all other respects your proposal is the same as 15 Lord Black's. I must ask you this, Lord Hunt: you say 16 that this should be a thorough-going process modelled 17 upon best practice, but is it best practice to have this 18 sort of appointments system? Why not have an 19 appointments system which is independent of the industry 20 altogether? 21 A. Well, I certainly believe independent policing of 22 standards is in the public interest, and the new body 23 has to be clearly and demonstrably independent of the 24 industry it regulates and also of the apparatus of the 25 state, and I would hope that certainly the conclusion <p style="text-align: center;">Page 83</p></p>
<p>1 should and must occupy the new self-regulatory structure 2 as being right at the heart of what it needs to 3 establish if we are to see a change in culture and 4 ethics across the whole industry. There shouldn't be 5 artificial barriers to people who feel they have 6 a genuine grievance. 7 LORD JUSTICE LEVESON: The people who have given evidence to 8 me on this topic aren't so much complaining about 9 a particular person who might have had a complaint but 10 about the way in which whole issues are addressed, such 11 as disability, such as mental illness, such as -- 12 A. Yes. 13 LORD JUSTICE LEVESON: Well, you've heard the examples. 14 Now, I appreciate that there is a line to be drawn which 15 permits even partisan comment, but you see such 16 complaints as fitting very firmly within the scheme that 17 you anticipate taking centre stage? 18 A. Yes, particularly article 1 of the Editors' Code, which 19 clearly says: 20 "The press must take care not to publish inaccurate, 21 misleading or distorted information." 22 And I think it is perfectly in order for a group or 23 an individual who feel that accuracy, code one, has not 24 been followed, to make the new regulatory structure 25 aware of their views. <p style="text-align: center;">Page 82</p></p>	<p>1 will be to recommend an appointments system which will 2 entrench that independence. I feel that very strongly. 3 Otherwise the public will not have trust and confidence 4 in the new body. 5 LORD JUSTICE LEVESON: But do you think the public is likely 6 to have trust and confidence in a body which gives to 7 the industry nominees a veto on the appointment of the 8 independent chair? 9 A. Well, I -- I was hoping you were going to provide the 10 answer to that question. 11 LORD JUSTICE LEVESON: But you, in paragraph 71, suggest 12 that the answer is yes, because you propose that the 13 appointment must be unanimous. 14 A. Yes. It's because I've always started from the point of 15 view of consensus. I think the way ahead must be by 16 agreement and I would not want to get off to a bad 17 start, and I therefore put in the word "unanimous" 18 because I think everyone should agree. It does, 19 I recognise immediately, give a veto to the independents 20 and also to the industry -- 21 LORD JUSTICE LEVESON: But the independent people will 22 almost certainly want somebody who is independent. The 23 press people may want somebody who looks independent but 24 who is "one of us". 25 A. I have yet to find that degree of cynicism. <p style="text-align: center;">Page 84</p></p>

<p>1 LORD JUSTICE LEVESON: Oh, have you?</p> <p>2 A. I believe that there are independent people who don't</p> <p>3 necessarily want independent people, and there are</p> <p>4 equally press people who don't necessarily want press</p> <p>5 people. I just want there to be unanimity on the right</p> <p>6 way forward, but I will be guided by you, sir.</p> <p>7 LORD JUSTICE LEVESON: Well, I'm prepared to accept that</p> <p>8 people may consider me cynical as well. I just want to</p> <p>9 be realistic and ensure that there is a system which</p> <p>10 attracts public confidence.</p> <p>11 A. Yes, yes.</p> <p>12 MR JAY: The other point of departure between your proposal</p> <p>13 and Lord Black's proposal, assuming I've correctly</p> <p>14 understood Lord Black's proposal, which I believe</p> <p>15 I have, is that you put forward the idea that the</p> <p>16 independent chairman should be the chief ombudsman on</p> <p>17 complaints and the principal arbiter of standards. So</p> <p>18 are you saying, Lord Hunt, that the ombudsman in effect</p> <p>19 is the first tier of the complaints committee, or is he</p> <p>20 or she the appeal body? How is this working in</p> <p>21 contradistinction to Lord Black's proposal?</p> <p>22 A. Well, I reached this conclusion after my visit to Dublin</p> <p>23 and also considering a number of other systems and</p> <p>24 a number of other ombudsman, and I think the key to this</p> <p>25 system working well will lie in the character and</p> <p style="text-align: center;">Page 85</p>	<p>1 proposal, but it may be that your proposal is better.</p> <p>2 In order to test whether it is, can we just see what</p> <p>3 this ombudsman is doing? Is he or she the first level</p> <p>4 of the complaints system, as it were? I mean,</p> <p>5 obviously --</p> <p>6 A. No, the first level must be the internal newspaper and</p> <p>7 magazine.</p> <p>8 Q. Yes. Putting that aside --</p> <p>9 A. If that can't resolve, then it moves into what I have</p> <p>10 sought to describe as the complaints arm with its panel</p> <p>11 of adjudicators: 13, eight independent, five from the</p> <p>12 industry.</p> <p>13 Q. Mm-hm.</p> <p>14 A. And obviously that complaints arm would operate</p> <p>15 alongside the standards arm, which would also have</p> <p>16 a panel of experts, and if necessary, an investigation</p> <p>17 by a panel of three --</p> <p>18 Q. We understand that.</p> <p>19 A. So that is the structure.</p> <p>20 Q. So where's the ombudsman fitting in in this structure?</p> <p>21 A. Well, I see the ombudsman as being the independent</p> <p>22 chairman of the whole structure. That is one solution.</p> <p>23 That's one way forward. There are many others, but</p> <p>24 that's the one that I thought would attract the maximum</p> <p>25 support.</p> <p style="text-align: center;">Page 87</p>
<p>1 personality of the person who is going to occupy this</p> <p>2 key role, and I would therefore want them to have that</p> <p>3 power and that influence.</p> <p>4 Q. Is this person an ombudsman properly so called, or is it</p> <p>5 someone who is just going to be regarded as very</p> <p>6 important and key to the whole system?</p> <p>7 A. Oh no, no, no, it's got to be someone who is seen by the</p> <p>8 public as someone in whom they can have trust and</p> <p>9 confidence to make the right decision.</p> <p>10 Q. But an ombudsman properly so called? Because an</p> <p>11 ombudsman, on the evidence the Inquiry we've received,</p> <p>12 is usually independent of the body it's regulating, and</p> <p>13 this ombudsman is not part of the system. Ombudsmen</p> <p>14 also usually have power to award compensation. So it's</p> <p>15 not, on our understanding, an ombudsman at all. I just</p> <p>16 want to understand what your terminology amounts to, if</p> <p>17 I may.</p> <p>18 A. Well, during the course of that first independent</p> <p>19 inquiry into the financial services ombudsman that</p> <p>20 I did, I was introduced to the Society of Ombudsmen, and</p> <p>21 I have to tell you they are so different depending on</p> <p>22 which country they're in, which jurisdiction. I don't</p> <p>23 think I can generalise, except to put forward my view of</p> <p>24 what this ombudsman would be.</p> <p>25 Q. Okay. Well, we don't see it mirrored in Lord Black's</p> <p style="text-align: center;">Page 86</p>	<p>1 Q. Well, we may be playing with words, but the distinction</p> <p>2 may be important. That, on our understanding of the</p> <p>3 term, is not an ombudsman properly so-called, but</p> <p>4 nonetheless the chair of the trust is occupying a very</p> <p>5 important position in the whole structure.</p> <p>6 A. Yes.</p> <p>7 Q. We can see it on Lord Black's charts.</p> <p>8 A. Yes.</p> <p>9 Q. We may dispense with the label, but we understand the</p> <p>10 importance of the role that person occupies. Can we at</p> <p>11 least agree with that?</p> <p>12 A. Yes.</p> <p>13 Q. You also suggest -- it's not explicit in Lord Black's</p> <p>14 model, but it may be implicit -- that the new regulator</p> <p>15 should require a communications function. This is</p> <p>16 paragraph 36 your statement. What precisely do you have</p> <p>17 in mind there?</p> <p>18 A. In what respect?</p> <p>19 Q. How is this communications function going to be</p> <p>20 discharged and what is the need for it?</p> <p>21 A. In relation to the ombudsman?</p> <p>22 Q. No, in relation to the system as a whole.</p> <p>23 A. Well, I see the ombudsman as certainly not being</p> <p>24 a champion of the free press but believing in a free and</p> <p>25 responsible press, and the job of the ombudsman is to</p> <p style="text-align: center;">Page 88</p>

<p>1 ensure that the responsibility element of the equation 2 is just as important as the freedom element, and the 3 system should operate on the basis that a free press is 4 in the public interests as long as it operates within 5 the code, and that's the way I look at the use of the 6 word "ombudsman" and indeed the purpose of the whole 7 structure.</p> <p>8 Q. The next section of your evidence is effectiveness, 9 paragraph 35. You identify five principles -- these are 10 the Hampton principles -- and you add a sixth principle, 11 namely independence. We understand that. In agreement 12 with the public interest -- that's paragraph 37. We 13 understand that.</p> <p>14 May I ask you, please, about the amendment of the 15 code which you refer to in paragraph 37, which I think 16 is fairly recent, if my recollection is right, 17 Lord Hunt. It requires editors to demonstrate the 18 public interest has been served and the amendment is, 19 and how and with whom that was established at the time.</p> <p>20 How has this amendment been used or tested at all 21 since this introduction and what difference, if any, is 22 it making? Can you assist us with that?</p> <p>23 A. I'm told it has made a considerable difference, in that 24 now, whenever public interest -- and it will be 25 comparatively rare that public interest is discussed in</p> <p style="text-align: center;">Page 89</p>	<p>1 A. Yes.</p> <p>2 LORD JUSTICE LEVESON: Choose a time, Mr Jay.</p> <p>3 MR JAY: I want to sort of leave -- I think we can break 4 now. I wanted to ration myself to an hour and a half 5 tomorrow morning with Lord Hunt, otherwise we're going 6 to be in danger of not completing the business of the 7 day, but I think I will be successful.</p> <p>8 LORD JUSTICE LEVESON: If you want to --</p> <p>9 MR JAY: No, I'm not that concerned now.</p> <p>10 LORD JUSTICE LEVESON: Right.</p> <p>11 MR JAY: But I am asked to say that we're reading in 12 a number of statements today.</p> <p>13 LORD JUSTICE LEVESON: Right, let's do that.</p> <p>14 MR JAY: The list will be put on the website immediately. 15 I'm not going to read out the whole list now. There's 16 quite a lot of them.</p> <p>17 LORD JUSTICE LEVESON: All right. Could I just see the 18 list?</p> <p>19 MR JAY: Certainly. (Handed)</p> <p>20 LORD JUSTICE LEVESON: I hope it's not inconvenient for you 21 tomorrow morning.</p> <p>22 A. No, no, not at all, sir.</p> <p>23 MR JAY: These have all been circulated to the CPs. Any 24 about which there is some concern or dispute are not on 25 the list and will be taken up subsequently.</p> <p style="text-align: center;">Page 91</p>
<p>1 this way -- I am told now that there is every effort 2 made to record exactly what is said and done at that 3 time.</p> <p>4 I don't think it was an easy amendment for the press 5 to accept. There was considerable discussion about it, 6 but I think it's a reflection of the way standards have 7 improved and culture has improved that everyone felt 8 that this was a necessary amendment and it came in on 9 1 January this year. It's a little early still to 10 adjudicate on how effective it's been, but I think it's 11 a move -- certainly a move in the right direction.</p> <p>12 LORD JUSTICE LEVESON: Well, one hopes it's never 13 challenged, because everybody does it properly.</p> <p>14 A. Yes.</p> <p>15 MR JAY: The next theme you take up -- this is paragraphs 39 16 to 41 -- is that of flexibility.</p> <p>17 A. Yes.</p> <p>18 Q. The need to ensure that there isn't, as you say, the 19 time bomb of obsolescence built into the system. Are 20 you contemplating here simply this: that the system is 21 flexible enough to enable new entities to be 22 incorporated within it, either in terms of the criteria 23 for entry or the ability of those currently within the 24 system to amend its terms? Is that basically the issue 25 here?</p> <p style="text-align: center;">Page 90</p>	<p>1 LORD JUSTICE LEVESON: I've seen this list. Yes, I agree. 2 Thank you very much. All the statements identified in 3 this document, the deadline for objections having been 4 4 pm on Monday, 2 July, will be deemed read into the 5 record of the Inquiry. Thank you very much. Tomorrow 6 morning at 10 o'clock. 7 (4.36 pm) 8 (The hearing adjourned until 10 o'clock the following day)</p> <p>9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 92</p>

A	adjourned 92:8	allowing 66:4	43:2 45:5 59:8	associated 51:22	50:19	20:22 21:1,2,5
abhorrent 33:17	adjudicate 49:2	allows 35:21	59:10 60:9	74:21	based 1:24 55:13	24:10 26:10
abide 20:14	90:10	alongside 44:14	appropriately	association 6:8	basic 33:12	31:18,22 32:6
ability 15:9	adjudicating 9:6	87:15	14:10	23:15,24 25:7	basically 90:24	32:25 34:15,19
16:13 27:14	49:17,25	altogether 83:20	arbiter 85:17	25:19 26:22,24	basis 2:12 46:11	36:3,5 40:23
33:6,18,24	adjudication 7:9	amenable 15:24	arbitral 44:17	34:23 73:25	54:20 56:5,7	48:19,20 75:5
42:24 44:22	7:20 8:19 9:17	amend 19:12	76:16 77:1	75:13	71:14 89:3	77:14 79:17
80:25 90:23	9:23 10:7,12	90:24	arduous 38:7	assumes 79:1	Bear 5:21 21:16	80:17 83:4
able 4:14 11:20	10:20 15:25	amended 17:13	area 10:10 12:5	assuming 85:13	bears 42:9	body 12:4 18:24
12:13 13:9	17:25 18:3	amendment 19:5	23:19 24:7	assured 81:20	behalf 61:16	22:7,24 23:1
14:4,9 15:20	68:23 69:3	63:23,24,25	25:11 53:25	attacked 61:5,7	81:25	35:24 42:21
16:3 18:16	adjudications	89:14,18,20	74:16 76:13	attacks 61:18	behave 59:2	43:1 45:3 56:2
20:9 21:23	8:6 9:2 17:12	90:4,8	83:3	attempted 43:10	behaved 57:20	57:4 76:24
31:21 63:2	17:19	American 63:24	areas 26:15	43:13 75:6	behaviour 43:4	77:13 78:10,17
73:22 74:10	adjudicators	amount 4:13	46:25 48:4,22	attend 32:20	behavioural 59:3	83:22 84:4,6
78:5	87:11	42:1 52:3 60:1	83:1	attentively 81:21	59:6,10	85:20 86:12
absence 55:25	admits 12:22	78:2	arena 57:7 64:3	attract 87:24	believe 22:3,19	bomb 90:19
absolute 58:24	admittedly 47:14	amounts 86:16	arguable 59:7	attracts 85:10	24:10 25:9	branded 17:19
absolutely 23:5	advanced 40:24	analysis 59:12	arguably 4:5	attributes 44:8	35:12 42:17,21	breach 6:23 7:1
accept 12:20	adverse 20:16	71:14	argument 36:14	44:18 45:13	43:9,19 53:4	10:16,16 12:15
42:22 59:20	33:15,20 34:7	ancient 47:15	62:9 64:12,24	atypical 37:4	53:14 58:14	12:15 13:2
85:7 90:5	35:17	Andrew 34:25	arisen 12:2 35:5	38:4	59:19 67:20	16:8,9 35:16
acceptance 78:6	advertisement	annex 5:1,5	arises 34:10	Aung 57:24	71:2 80:1,7	35:23 36:20
78:24	25:4	annual 5:8 29:6	arm 3:8 6:3 7:2	authenticity	83:21 85:2,14	47:3,5 78:20
accepted 47:8	advertisers	29:21,25	7:21 8:1,12	44:22	believed 21:5	breaches 3:17
54:5 65:21	25:16,24	annually 29:14	11:24 12:4	authority 22:4	31:14	4:3,6,11 30:19
66:6	advertising	answer 32:6,21	44:14,15,16,17	23:10 65:25	believes 11:19	30:20 79:4
accepting 48:17	25:22 26:2	41:9 84:10,12	48:7,24 76:15	automatically	32:5	81:16
accepts 58:11	advice 81:2	answers 16:16	76:16 77:1	21:1	believing 88:24	breaching 47:8
accident 2:22,23	advised 76:12	anticipate 78:15	78:19 87:10,14	autonomy 77:15	bell 38:22 39:22	break 41:12
account 9:19	advisers 34:24	82:17	87:15	avoids 49:14	benchmarkings	56:13,17 91:3
23:1 30:7,11	advocate 65:13	anti-competition	arms 44:13	await 65:13	26:11	breakdown 30:5
35:2 54:12	66:2 71:6	24:13	arrangement	72:22	benefit 27:10	brief 71:12
accountability	Affairs 61:7	anybody 44:1	24:15	award 86:14	benefits 71:3	bring 16:20
2:15 26:6 32:3	62:15	67:9	arrived 77:25	aware 60:3,7	benign 63:13,14	48:13 81:22
accountable	afresh 21:9	Anyway 16:2	article 12:8 16:8	70:1 74:11	best 10:4,9,21	bringing 10:9
30:14,20	agenda 74:7	apart 4:24	28:5,5,8 29:1	82:25	11:7 41:20	25:15
accuracy 13:8,14	aggrieved 20:10	apologies 7:19	47:1 64:10	B	45:11,19 73:5	British 25:16
13:16,19 14:20	20:21	8:4 17:13	82:18	B 5:1,5	76:11 83:17,17	57:18
82:23	ago 13:5 38:2,11	apology 17:25	articles 26:22,24	back 1:5 2:11	better 10:13 15:4	broke 38:25
achieve 26:10	agree 1:20 2:19	appalled 66:16	72:21 73:25	5:18 7:7 10:11	48:15 87:1	56:17
60:14 71:1	14:3 17:21	apparatus 83:24	75:12	12:11 14:19	beyond 27:22	broken 3:6,25
achieved 26:19	18:2 24:14	appeal 19:23	artificial 82:5	17:9 19:25	67:2	brought 14:1
acquiescence	25:18 27:23	20:6,9 85:20	ashamed 53:2	31:10 36:10	bill 49:23 65:7	46:22 55:20
80:14	43:13 49:12	appearance	aside 9:11 69:15	39:20 61:2	71:1 77:5,9	brush 69:14
act 36:16 37:9	51:25 53:7	43:17	87:8	68:20 79:1	bills 65:15	budget 10:2 78:7
60:21 63:17	59:12 71:19	appeared 22:17	asked 36:22	background	bind 42:25	build 13:10
65:3,3,25	79:6 84:18	appearing 68:1	38:10 42:15	20:18	bit 11:3 23:21	built 4:3 90:19
70:23 71:7	88:11 92:1	appears 3:16	43:17 65:15	backwards	25:12 57:22	bullet 77:12
action 7:16 54:22	agreeable 11:6	appendix 20:1	70:4 72:21	52:12	63:12,12 65:17	bundle 1:6 26:25
72:12,14	agreed 17:14	appetite 47:14	76:1 78:14	bad 60:11 84:16	Black 1:4 11:14	bureaucracy
activities 27:10	19:6 43:21	applied 63:18	80:23 81:7	badge 25:1	17:10 19:24	34:5
56:1 58:5	52:17 53:9	appoint 20:23	91:11	badly 11:25	27:20 29:2	Burmese 57:25
actual 9:18	agreeing 64:23	21:6	asking 54:17	baggage 46:2	36:23 40:3,19	business 22:11
adapt 80:5	agreement 17:24	45:1	63:15	Baird 61:6	48:19 58:13	22:12 67:6
add 28:19 65:19	18:10 53:15	appointment	29:8 40:15	balance 48:3	74:10 78:8	91:6
89:10	74:11 75:2	83:3 84:7,13	aspersions 51:19	50:2 52:7	80:2,13 83:13	
added 30:3	84:16 89:11	appointments	assertion 2:2	balances 32:1	Black's 58:15	C
adding 76:23	agrees 18:5	83:18,19 84:1	assess 80:10	53:19	62:4 73:10,23	cack-handed
addition 8:7	ahead 84:15	appreciate 40:21	assessments	bar 22:12,19	79:21,24 83:2	11:3
additional 78:18	aims 47:24	41:1 77:4	37:15	52:12	83:7,15 85:13	Calcutt 54:10,16
address 29:7	albeit 43:3	82:14	assessor 20:7,11	barriers 82:5	85:14,21 86:25	55:3 72:2
addressed 24:22	alive 54:16	approach 9:6	assist 89:22	barrister 50:7	88:7,13	Calcutt's 54:7
82:10	allegations 15:23	appropriate	assistance 14:23	barristers 49:22	blank 45:3	called 44:19
adhere 59:6	allocated 77:18	26:23 31:15	22:10 40:15	49:25 50:6,6	board 4:13 5:3,7	56:18,19 86:4
adhered 46:8	allotted 40:6				6:3 19:11	86:10

calling 43:15	chance 54:13,14 56:20 58:9	48:5,14,16 65:4,8,10 69:6	51:8 89:25	74:15	42:22 58:22 59:24 60:1	20:12,25 21:13 25:8 39:18,19
cap 5:10	Chancellor 60:22 62:11,14	80:24 81:16	compare 8:2	completing 91:6	70:19 89:23	44:11 62:9
card 21:24 22:10 22:14 23:8,10	62:18	82:18,23 89:5	comparisons 52:5	compliance 5:3 7:16,23 19:8	90:5	63:9 71:15
cards 21:19,22 22:3,25	change 46:9 64:19,20 79:2	89:15	compelled 71:18	20:16,23 28:14	consideration 21:21	corrected 8:6 19:22
care 18:16 82:20	82:3	codification 8:23	compensation 8:17 76:23	29:13 31:3	considering 85:23	correction 6:22
carries 42:9	changed 12:25 18:13 37:25	codified 10:23	86:14	32:24 33:21	constituted 68:11 78:17	correctly 17:6 20:5 63:7
carrot 21:18 40:20	45:10	codify 26:21	competition 24:16 40:15	34:20 44:14	constitution 63:24	cost 9:16 78:4,10
carrots 21:17	changes 45:17 46:22	codifying 11:8	complain 12:9 14:21 16:14	54:4 76:21	Constitutional 60:21 61:7	costly 31:24,25
carrying 54:24	character 85:25	cognisance 77:21	81:9,18,19,24	79:9	62:15 63:17	costs 78:9
case 9:1 10:22 12:3 13:4,15	charge 31:3	colleagues 81:20	complainant 2:7 2:13 8:12,15	comport 26:14	constructive 35:8	Council 13:5 61:15 70:25
19:11 20:14	charts 88:7	collecting 12:8	9:20,25 10:6	composition 6:9 6:11	consultation 35:3,5 42:7,11	country 86:22
21:6 31:11	check 19:17	combined 46:6	10:18 20:5,9	comprehensive 42:6	consulting 73:13	couple 40:19
32:5 33:25	checks 32:1 53:19	come 13:20 39:20 42:21	35:22 69:1	conceding 59:23	contemplating 90:20	course 3:4 9:11 13:8 20:17
34:2,3,15 36:2	chief 31:11 50:23 52:3 61:18	comes 14:13 21:11 59:5	79:14 81:23	concentrate 37:4	content 1:14	22:9 25:22
54:2 62:16	85:16	77:9	complainants 9:21	concentrated 75:22 76:3	context 11:14 38:20 39:9,13	26:14 28:9,15
65:9,12 72:7 78:25	children 28:16	coming 11:2 49:9	35:15 63:6	concern 11:11 50:9 62:2,5	62:13 63:6	31:7,9 34:16
caselaw 60:2	choose 31:13 91:2	command 55:21	68:20 69:5	63:11 91:24	continually 47:11	36:6 38:3,8
cases 18:9 49:16 49:19 66:19	Cicero 56:23	comment 33:5,9 62:1 81:14	complaining 12:22 15:8	concerned 37:24 40:4 43:11	continue 13:22 48:16 56:3	43:3 51:7
casting 51:19	circle 52:2	82:15	35:22 63:2,5	70:23 91:9	61:1 76:25	54:22 66:7
categories 3:13 3:14	Circuit 61:15	commented 73:9	82:8	concerns 1:18 49:18 81:5	contract 19:8 23:16 29:10	73:20 75:23
cause 10:2 49:15	circulated 91:23	comments 35:4	complaint 2:9 3:24 7:5,9,24	49:18 81:5	30:25 36:11,14	86:18
cent 5:8 68:15	circumstances 3:4,8 8:17 9:24	commercial 37:12,19 55:11	8:11,13,16,21	concoiled 8:11	36:20 40:12	court 36:17 72:12,14
centre 82:17	13:25 31:10	55:14 77:3	9:16,18,21	conclude 45:25 53:5	42:25 54:22	courts 36:20 60:6 76:18
certain 6:17 15:23 24:4	38:16 43:25	Commission 6:17 13:16	11:18,21 12:7	concluded 48:13	60:15 71:18,25	Court's 65:9
27:5 33:19,25	72:24	14:16 43:19	12:12 13:7,9	concludes 40:7 45:8	72:14,20 73:1	cover 4:16 19:20
59:3 70:24	clandestine 47:2	49:1 54:18,19	13:14,19 14:13	conclusion 72:20 74:14 83:25	73:16 75:12	32:3 40:10
certainly 10:1 14:17 34:2,12	clarified 28:8	54:25 55:20,22	15:11,20,24	85:22	80:3,8	coverage 15:17 71:2
36:17 37:18	clarify 16:25	56:6,11 67:19	31:20 68:17	conclusions 46:8	contracts 24:2 24:22 55:11,13	covered 2:3 19:18,21,24
41:13 43:16	clause 5:5 14:19 15:15,25 16:14	72:4	69:2 70:2 81:7	condemned 61:18	55:14 56:20	24:18 27:25
44:25 46:17	16:21,23 17:13	commissioners 42:8 49:2	81:22,23 82:9	condition 56:25	71:14 77:3	28:10
47:1 49:4 55:2	27:16 28:18	commissions 55:8	2:11 3:8 5:20	conditional 37:9	contractual 7:3 19:9 36:13	CPs 91:23
71:23 73:20	47:3,5 60:21	commitment 63:19	6:1,3,13,16,18	conditionally 76:2	54:20 56:4,7	create 41:2 43:1 54:23
79:7,12 80:7	clear 3:24 4:14 8:14 13:1	committed 23:5	7:2,4,12,15,21	confidence 57:9 62:17 84:3,6	73:24 74:20	creating 34:4 75:3
81:3 83:21,25	17:20 18:14,22	committee 6:14 7:4,13,15 9:5	8:11 9:4 10:4	85:10 86:9	contractually 30:24	creeping 63:11 63:13
84:22 88:23	23:11 24:8	11:17 18:21	11:10,17 12:18	confidential 66:23	contract-based 74:17,18	crime 39:7
90:11 91:19	25:25 28:8	19:1,12 20:2	12:20 13:6,15	confirm 16:19	85:21	criteria 90:22
certification 29:6,21,23	31:17 38:4	20:15 36:25	14:1,6,9,15,19	conflicts 46:2	contrary 80:24	critical 17:12,19 49:5 52:25
30:1	42:4 51:18	48:5,5,14,17	15:5,15 16:20	confusing 64:6	control 64:4 78:1	61:13
cetera 26:12	clearer 23:21	54:17 55:3	20:2,14 31:5,6	Congratulations 40:2	convenient 56:9	criticised 17:21
27:15 53:13	83:23	62:15 85:19	31:20 43:19,23	conjunction 14:3	conversations 66:23	criticises 64:18
chair 48:25 59:15 83:4	clearly 9:7 19:24 58:19 82:19	committees 55:8	44:10,14 48:7	consensus 35:12 49:9 53:4	cope 63:10	cultural 46:22
84:8 88:4	83:23	committee's 72:2	48:24,25 49:2	84:15	copy 23:15	culture 29:4 46:10,10,19
chairman 37:16 42:20 45:3	code 3:18 6:23 10:16,16 12:15	common 55:19	50:1 54:4	consenting 32:15	cop-out 57:12	47:16 54:12
58:1 79:20	13:23,25 14:3	communications 88:15,19	67:11,13,19,19	consequences 65:17	corpus 59:22	64:19 79:2
85:16 87:22	14:20 15:16,25	community 15:22 27:3,10	68:12,16,24,25	Conservative 39:15	correct 4:23 5:13	81:1 82:3 90:7
challenge 35:25	16:8,14,21,23	company 27:2,3 27:4,4 28:13	69:14,15,20,25	consider 55:4 85:8	6:11 7:17 8:18	cumbrous 59:17
challenged 90:13	17:13,21 18:13	29:12,16 31:12	72:4 76:22,25	considerable	18:1 19:14	current 6:4 9:3 27:4 42:5
challenges 37:13 80:6	18:21 19:1,7,7	comparatively 43:4 50:14	79:14 81:15			71:13
challenging 23:19	19:8,12,13		82:16 85:17,19			
Chamberlain 34:24	25:20 27:14		87:4,10,14			
champion 88:24	28:14,15,22		complaints-ha... 76:5,24 78:16			
	29:14 37:3		78:21 79:10,11			
	46:12,13,21		complete 22:12 51:1			
	47:9,12,20		completely 62:21			

currently 21:20 23:18 25:19 35:12 52:22 53:11 68:11 90:23	86:9 decisionmaker 48:22 decisions 20:3 49:18 60:5 63:6,7 83:12	22:1 difference 6:6,9 10:1 11:16 50:3 80:16 83:1 89:21,23	dispute 32:23 33:1 34:10 91:24 disputes 7:3 76:17 distance 43:2 distinction 88:1 distorted 82:21 divide 49:6 doctor 2:23 doctors 2:17 document 5:19 5:23,25 6:20 21:15 35:6,7,9 35:15,21 47:6 74:7 92:3 doing 9:8 11:19 37:10 71:18 87:3 door 49:3 doubt 35:1 39:1 63:5 71:15 downright 15:10 dozen 12:9 draft 1:4 33:4,5 33:8,8 72:20 72:20,21 drafted 4:12 34:23 35:1 drafting 16:11 34:22 drafts 72:19 73:14,15,17 draw 46:5 drawn 82:14 Dublin 85:22 due 1:19 17:14 26:14 73:20 duty 46:14 dynamic 80:6	28:14,15,22 30:17 42:12,15 46:12 48:5,6,8 48:10,13,16,24 49:4,14 50:10 50:25 51:2,4,6 51:9,11,24 52:12 53:1 65:10 69:22 70:3,5,7,8 75:21,24 76:8 79:22 80:24 82:18 89:17 effect 5:11 32:13 54:6,24 57:12 61:3,19,21,24 62:10 85:18 effective 52:15 53:10 90:10 effectiveness 89:8 effort 90:1 egregious 35:16 35:23 eight 87:11 either 4:8 18:5 21:4 31:19 32:15 34:6 38:22 90:22 electronic 1:15 element 7:12 46:7 48:18 65:24 89:1,2 elements 52:11 Embedding 26:6 embrace 44:15 embraced 45:14 emerge 52:11 emphasis 78:15 employed 21:23 51:13 80:22 enable 79:5 90:21 enabling 55:25 encompassed 28:3 encourage 22:23 40:25 encourages 60:10 endorsement 42:10 ends 60:14 endured 71:16 enforce 72:14 enforced 57:4 enforcement 9:12 72:12 78:11 enforcing 59:19 enjoys 58:22 enormous 42:1 50:3 51:22 67:18 enormously 25:25 67:24	ensure 21:22 46:8 52:17 53:9,18 79:3 85:9 89:1 90:18 entirely 15:17 23:6 25:22 entities 1:12 2:6 2:19 3:20 74:3 90:21 entitled 15:18 entity 4:17 5:8 29:12 32:8,13 32:14,23 33:4 33:9,13,18,22 34:8,14,17 35:17 36:8,15 74:24 entrench 63:22 84:2 entry 90:23 enunciated 73:10 envisage 21:12 episode 4:2 37:4 38:5 epitomised 58:13 equal 28:9 equally 41:1 46:4 46:7 47:4 85:4 equation 89:1 equity 34:1 equivalent 63:16 equivocation 18:15 error 56:22 especially 79:12 essential 14:8 60:4 establish 26:10 82:3 established 30:19 47:10 70:15 89:19 esteem 38:12 39:4 et 26:12 27:15 53:13 ethical 3:18 23:6 46:10,17,19 81:1 ethics 29:5 47:16 54:13 64:20 82:4 ethos 52:16,21 53:8,12,24 European 65:8 eventually 72:5 everybody 44:2 50:2 75:15 90:13 everyone's 60:16 evidence 4:3 10:15 21:11 30:16 40:22 41:16,22 43:18	44:13 55:1 62:14 67:3,5,7 67:10,17,21 71:10 82:7 86:11 89:8 exact 17:16 exactly 66:9 90:2 examined 80:9 examining 74:23 example 1:18 7:17 38:24 56:24 57:22 73:12 examples 3:23 66:22 82:13 exceptions 1:13 1:16 exclude 52:12 executive 31:11 50:23 65:22 66:4 executives 52:3 exercise 14:9 exercises 35:5 exhibits 54:11 exist 63:20 70:19 existed 47:13 existing 13:22 14:21,22 16:23 19:13 20:13 55:12 exists 59:25 60:2 expect 2:17 9:5 10:21 18:9 30:10 31:14 expectation 9:9 41:2 expected 2:6 31:8 expecting 10:3 expense 10:1 expenses 39:1 expensive 59:17 experience 45:9 45:20 expertise 46:5 experts 87:16 explain 68:18 explicit 28:11 88:13 expose 39:8 expounded 65:1 express 15:9 28:5 55:11 76:1 expressed 68:16 75:18 expression 27:18 27:22 37:11 44:6 60:11 expressly 40:14 extended 67:2 extensive 73:3 extent 2:4 3:6,25 53:6 55:1 extra 78:13	
D							
damage 37:10 damaging 65:16 Damocles 56:23 danger 13:4 91:6 dangers 68:3 dangled 40:20 dare 1:23 Data 65:3 date 45:9,20 dated 41:21,21 David 54:7,10 day 31:5 35:9 51:12 64:16 91:7 92:8 days 32:14 33:4 67:15,15 81:3 DCA 61:12 DCMS 36:25 deadline 92:3 deal 1:17 2:12 15:13 18:21 19:15 69:25 79:5 dealing 6:1 8:21 14:20 15:19 28:12 29:15 43:23 48:11 69:14,20,23 74:15 deals 3:11 5:19 22:4 dealt 6:16 9:21 10:4 14:16 15:15 33:23 66:2 67:18 68:13,16,17,19 69:2 79:14 death 62:20 debates 61:2 December 39:17 42:14 76:13 decency 1:19 15:8 decide 45:23 58:17 74:3 76:7 decided 50:2 deciding 63:15 decision 20:9,14 20:16,24 21:9 31:23 33:3,8 33:10,15 34:7 35:17,25 36:5 36:8 51:17 65:13 83:10	86:9 decisionmaker 48:22 decisions 20:3 49:18 60:5 63:6,7 83:12 decision-makers 51:4 deemed 92:4 defamation 65:7 71:1,7 default 17:24 defence 71:5 defend 60:23 deficiencies 54:12 deficient 17:1 define 1:14 45:24 66:8 defined 4:7 44:7 defines 13:25 definition 3:15 48:2 degree 6:17 34:4 59:24 84:25 delayed 34:11 deliberately 73:11 deliver 45:11,18 76:10 democratic 27:18 demonstrably 83:23 demonstrate 89:17 demonstrated 70:6 Department 61:7 departure 85:12 depend 24:12 26:13 depending 86:21 deprive 23:8 derail 34:18 derivation 65:25 describe 21:20 42:20 44:1 72:24 87:10 described 14:1 44:16 desirable 48:9 desperately 64:8 detail 22:4 31:8 40:3,10,12 71:9 75:16 77:18,24 detailed 73:6 74:22 75:11 76:9 detailing 55:23 details 73:10 determine 76:21 devices 47:2 differ 8:22 11:12	22:1 difference 6:6,9 10:1 11:16 50:3 80:16 83:1 89:21,23 differences 6:10 6:13 70:19,22 79:24 80:12,15 80:19 different 2:24 7:10 9:17 12:19 16:6 18:7 24:3 35:6 50:16 51:21,23 62:22 64:11 67:14 77:21 86:21 differing 74:12 79:10 differs 6:4 difficult 25:23 38:21 45:23 50:7 79:8 difficulty 31:2 37:23 51:15 diffuse 20:20 direct 47:3 69:15 79:14 directed 68:20 direction 37:6 90:11 directly 2:7,11 12:21 69:25 director 39:16 disabilities 15:7 disability 82:11 disagree 2:1 60:18 disagreed 18:10 42:16 disagreement 75:1 discharged 88:20 discourages 60:11 discretion 4:13 12:13,18 13:10 14:10 discrimination 14:14 16:20,21 discriminatory 14:17 discuss 42:2 75:23,24 80:25 discussed 3:23 25:13 47:8 73:12 89:25 discussing 54:15 discussion 45:25 49:8 90:5 discussions 46:17 49:6 67:23 76:3 disgraceful 43:4 dispense 88:9	dispute 32:23 33:1 34:10 91:24 disputes 7:3 76:17 distance 43:2 distinction 88:1 distorted 82:21 divide 49:6 doctor 2:23 doctors 2:17 document 5:19 5:23,25 6:20 21:15 35:6,7,9 35:15,21 47:6 74:7 92:3 doing 9:8 11:19 37:10 71:18 87:3 door 49:3 doubt 35:1 39:1 63:5 71:15 downright 15:10 dozen 12:9 draft 1:4 33:4,5 33:8,8 72:20 72:20,21 drafted 4:12 34:23 35:1 drafting 16:11 34:22 drafts 72:19 73:14,15,17 draw 46:5 drawn 82:14 Dublin 85:22 due 1:19 17:14 26:14 73:20 duty 46:14 dynamic 80:6	E earlier 3:23 5:15 7:8 9:5 29:22 31:17 33:7 35:11 36:10,24 38:8 55:8 70:5 79:1 early 70:10 73:15 81:3 90:9 earn 23:9 easier 16:19 76:21 easily 11:1 easy 63:12 76:16 90:4 easy-to-unders... 73:1,16 Echo 51:16 editor 6:25 30:23 51:12,16 69:15 75:25 editorial 1:14 49:7 76:2 editors 3:18 6:6	28:14,15,22 30:17 42:12,15 46:12 48:5,6,8 48:10,13,16,24 49:4,14 50:10 50:25 51:2,4,6 51:9,11,24 52:12 53:1 65:10 69:22 70:3,5,7,8 75:21,24 76:8 79:22 80:24 82:18 89:17 effect 5:11 32:13 54:6,24 57:12 61:3,19,21,24 62:10 85:18 effective 52:15 53:10 90:10 effectiveness 89:8 effort 90:1 egregious 35:16 35:23 eight 87:11 either 4:8 18:5 21:4 31:19 32:15 34:6 38:22 90:22 electronic 1:15 element 7:12 46:7 48:18 65:24 89:1,2 elements 52:11 Embedding 26:6 embrace 44:15 embraced 45:14 emerge 52:11 emphasis 78:15 employed 21:23 51:13 80:22 enable 79:5 90:21 enabling 55:25 encompassed 28:3 encourage 22:23 40:25 encourages 60:10 endorsement 42:10 ends 60:14 endured 71:16 enforce 72:14 enforced 57:4 enforcement 9:12 72:12 78:11 enforcing 59:19 enjoys 58:22 enormous 42:1 50:3 51:22 67:18 enormously 25:25 67:24	ensure 21:22 46:8 52:17 53:9,18 79:3 85:9 89:1 90:18 entirely 15:17 23:6 25:22 entities 1:12 2:6 2:19 3:20 74:3 90:21 entitled 15:18 entity 4:17 5:8 29:12 32:8,13 32:14,23 33:4 33:9,13,18,22 34:8,14,17 35:17 36:8,15 74:24 entrench 63:22 84:2 entry 90:23 enunciated 73:10 envisage 21:12 episode 4:2 37:4 38:5 epitomised 58:13 equal 28:9 equally 41:1 46:4 46:7 47:4 85:4 equation 89:1 equity 34:1 equivalent 63:16 equivocation 18:15 error 56:22 especially 79:12 essential 14:8 60:4 establish 26:10 82:3 established 30:19 47:10 70:15 89:19 esteem 38:12 39:4 et 26:12 27:15 53:13 ethical 3:18 23:6 46:10,17,19 81:1 ethics 29:5 47:16 54:13 64:20 82:4 ethos 52:16,21 53:8,12,24 European 65:8 eventually 72:5 everybody 44:2 50:2 75:15 90:13 everyone's 60:16 evidence 4:3 10:15 21:11 30:16 40:22 41:16,22 43:18	44:13 55:1 62:14 67:3,5,7 67:10,17,21 71:10 82:7 86:11 89:8 exact 17:16 exactly 66:9 90:2 examined 80:9 examining 74:23 example 1:18 7:17 38:24 56:24 57:22 73:12 examples 3:23 66:22 82:13 exceptions 1:13 1:16 exclude 52:12 executive 31:11 50:23 65:22 66:4 executives 52:3 exercise 14:9 exercises 35:5 exhibits 54:11 exist 63:20 70:19 existed 47:13 existing 13:22 14:21,22 16:23 19:13 20:13 55:12 exists 59:25 60:2 expect 2:17 9:5 10:21 18:9 30:10 31:14 expectation 9:9 41:2 expected 2:6 31:8 expecting 10:3 expense 10:1 expenses 39:1 expensive 59:17 experience 45:9 45:20 expertise 46:5 experts 87:16 explain 68:18 explicit 28:11 88:13 expose 39:8 expounded 65:1 express 15:9 28:5 55:11 76:1 expressed 68:16 75:18 expression 27:18 27:22 37:11 44:6 60:11 expressly 40:14 extended 67:2 extensive 73:3 extent 2:4 3:6,25 53:6 55:1 extra 78:13

extract 55:20	83:9	41:22	generally 52:10	39:13 42:2	92:8	25:7 30:2
extremely 35:8	Finance 40:23	former 30:16	59:3 67:22	great 37:6 44:7	Hearne 77:7	61:22 63:7
37:10 80:2	financial 4:25	formidable	68:24 69:24	48:10 66:7	heart 48:11 82:2	92:2
eye 58:2	7:25 9:14	59:22	generated 23:23	73:3 74:12	heartly 42:9	identify 6:2,12
	34:13 86:19	forms 55:17	genuine 66:20	greater 13:24	held 38:12 39:3	80:15 89:9
<hr/> F <hr/>	find 26:3 30:21	forth 28:17 31:3	82:6	25:6 47:14	help 7:7 8:24	identifying 7:11
faced 43:3	38:19 43:21	forward 10:7,9	give 4:13 11:17	74:3	26:3 50:17	IFB 5:13 6:7
facie 10:15 21:6	45:23 47:18	10:20 26:5	12:11,12 14:4	greatly 53:25	helpful 10:8 45:6	illness 14:18 15:6
facings 37:12	49:1 50:7 51:9	53:5,16 58:16	18:3 21:11	Green 34:25	67:24	82:11
fact 2:20,24 4:8	54:1,19 84:25	71:23 72:19	26:1 33:12	grievance 82:6	Henry 66:4	imagine 66:24
6:21 9:10	finding 33:20	73:6,19 74:5	38:19,23 39:23	ground 62:24	he'll 16:3	immediately
13:16 56:10	40:2	75:25 76:19	40:22 41:2,16	grounds 69:6	high 81:17	51:18 84:19
67:17 75:14	fine 5:7 7:22	80:2 81:22	43:18 57:22	group 11:10,20	higher 5:11 16:7	91:14
factor 51:4	8:16 38:8	85:6,15 86:23	58:8 65:22	11:24 12:7,11	highest 27:11	impact 23:9
failed 57:13	42:25	87:23	66:22 71:11	13:17,17,18	28:1,2,10,23	49:18 62:16
failure 3:15,19	fixed 30:21	found 30:10	73:19 75:7	14:5 15:5,17	46:15	impacting 62:7
3:21,21 4:6,7,8	finer 4:25 27:15	47:17 52:24	76:20 84:19	15:17,20 50:14	highlight 68:3	impartiality 1:19
4:8,9,10 20:18	firmly 82:16	53:21 58:12	given 41:9 49:21	51:24 81:18,24	highly 34:16	impetus 9:14
fair 6:5,15 74:22	firms 52:2,3	67:23 70:14,17	53:11 54:7,13	82:22	39:8	implications
fairly 6:22 11:1	first 2:10 5:14	78:23 79:12	54:14 67:2,5,7	groups 14:2,21	high-profile	72:15
21:5 33:23	20:2,24 21:2,8	83:9	67:10,20 73:17	14:24 15:7	66:18	implicit 71:14
36:16 53:24	21:18 28:7	framework	78:12 82:7	16:13,20 46:18	Hill 77:8	88:14
89:16	29:8,16,20	25:17,21 62:6	gives 55:6 84:6	67:4,20,21,22	historians 55:2	implied 36:14
fairness 65:18	30:8 32:10,12	frankly 75:9	giving 33:17	67:25 68:6	history 46:2 54:8	55:13 71:24
faith 68:10,11	32:17 36:23	free 58:10,11	62:14 74:2	guarantee 27:5	HM 61:15	importance
fall 31:10	42:22,23 43:12	60:12 61:23	go 1:5 5:18 7:3,7	guidance 74:15	hole 64:7	27:17,21 28:9
falling 59:9 69:5	45:22 48:4	63:8,19 88:24	12:23,24 17:9	76:15,20	Home 61:5	28:20 39:2
far 24:8 37:24	55:7 58:14	88:24 89:3	18:3,6,12,17	guided 85:6	honour 57:23	67:24 88:10
43:10 53:20	59:5,14 63:24	freedom 27:18	19:25 22:24	guidelines 5:6,12	hope 11:7 27:25	important 6:2
59:9 60:25	63:25 69:16	27:22 37:11	26:23 29:21	10:9	40:24 45:6	7:12 10:6
64:2 70:23	70:1 71:20	58:24 62:8	32:22 36:9,17	guilty 30:10 39:7	83:25 91:20	14:11 26:21
75:2 77:22	74:16 75:4,6	89:2	40:25 41:6		hopes 90:12	31:1 48:4
79:13	85:19 86:18	freedoms 58:22	55:23 64:10	<hr/> H <hr/>	hoping 72:25	49:12 67:8
fascinating	87:3,6	fresh 43:1	71:9 75:7	hacking 37:5	73:18 74:14	80:20 86:6
70:14	fitness 80:10	front 40:20	77:24	half 12:9 91:4	84:9	88:2,5 89:2
fashion 8:25	fitting 82:16	fulfils 76:12	goes 4:5 30:1	hammered 10:11	Horgan 65:6	impose 5:2
fashioned 45:5	87:20	full 10:7 28:4	46:16 64:2	Hampton 89:10	70:16	impossible 2:1
fatal 56:1	five 52:2 87:11	function 88:15	79:1	hand 42:17	hospital 28:16	38:2 79:8
fault 35:20	89:9	88:19	going 8:16 9:4	handed 36:24	hotline 80:21	impression 63:8
favour 30:22	flexibility 44:15	fundamental	18:12,17,18,20	91:19	hour 91:4	imprimatur 42:9
35:17 36:1	80:5 90:16	22:15 37:19	18:23 20:1	handled 31:6	house 72:8 77:10	improve 47:12
41:3 80:17	flexible 81:3	funded 77:23	22:11,12,23	handling 54:4	huge 35:4 51:9	improved 46:20
fear 56:25 74:20	90:21	funding 77:12,13	23:12 24:5	76:22	52:3 69:23	47:6 79:4 90:7
75:13	fluid 80:6	77:18,24	26:5 29:17,22	hands 18:24	73:3	90:7
feathers 39:25	follow 35:19	funds 78:6	30:12,23,25	66:14	Human 37:9	inaccuracies
features 53:20	followed 21:5	funnel 7:8	31:4,22 32:11	hanging 57:1	65:3	2:21
feel 44:21 58:8	47:1 82:24	further 12:23,25	34:13 37:1	happen 34:8	hundreds 70:7	inaccuracy
62:18 77:14	following 1:11	14:22 20:11,23	49:10 50:14,15	51:18	Hunt 15:18 16:2	10:18
79:22 82:5,23	31:19 33:15	21:10 24:19	52:10 57:2	happening 68:5	16:15 21:11	inaccurate 82:20
84:2	56:16 61:4	32:18 33:2	62:24 63:1	happiness 56:25	41:11,14,16,24	inappropriate
feels 11:25 78:5	92:8	36:22 40:4,15	66:22 74:16,18	happy 17:4 40:9	42:4 52:13,19	66:5
80:23	follows 42:8	40:25 41:7,19	84:9 86:1,5	haunt 39:20	56:16 59:21	incentive 22:19
fees 37:9	follow-up 29:15	44:16 54:13	88:19 91:5,15	head 12:18 14:9	64:12 70:12	23:14,20 24:1
fell 66:20	force 13:25 19:9	64:2,11	good 11:21 14:19	31:20,21 32:5	71:10 74:1	29:25 30:3
fellow 42:8	foremost 45:22	future 37:12	16:4 38:11	32:24 49:20	75:8 78:2	71:3
felt 68:14 73:18	forensically 80:8	49:19	39:6,12 41:10	64:7	83:15 85:18	incentives 21:14
81:8 90:7	forgive 16:10		46:11 60:10	headhunters	89:17 91:5	29:20 30:12
fewer 79:4 80:18	forgotten 56:23	<hr/> G <hr/>	70:15 75:10	83:9,13	Hunter 40:14	include 19:13
field 51:23	form 7:18 9:22	gatekeepers	76:24 80:2	heading 37:5		68:19
fight 62:20	10:3 13:10	21:21 22:16	governance 3:24	health 14:18	<hr/> I <hr/>	included 69:7
fighting 63:23	22:15 32:3	general 24:21	29:3 79:4	hear 45:7	idea 42:22 54:20	includes 3:21
figure 10:2	51:1 55:10,18	26:19 29:2	government	heard 15:6 29:22	76:24 85:15	including 26:11
figures 50:18	57:15 64:8,13	39:24 40:5	25:11 77:6	38:25 49:4	ideally	29:6 43:21
filled 67:14	64:25 77:2	61:10 78:6,24	gradation 7:10	55:1 66:16	72:25	inconvenient
final 25:11 33:9	formal 6:24 7:19	85:8 9:16,23	grain 2:14	82:13	ideas 45:6	91:20
33:11 80:7	8:5,8 9:16,23	generalise 86:23	grateful 25:25	hearing 65:5	identified 6:24	incorporated

25:16 77:7	71:15	20:17,24 30:2	39:3,25 43:5	knocked 10:2	32:22 35:14,20	looked 23:11
90:22	information 4:18	30:4 31:19,22	49:5 50:12	know 7:4 15:6	36:6,21 38:7	26:24 58:2
increasing 2:15	82:21	31:23 32:11,15	53:1 59:2,6,9	27:19 28:21	39:6,11,20	68:13
independence	infringement	32:16,21,24	59:20 60:2,4,7	50:5 75:7	40:8,13,19	looking 7:18
60:23,25 61:3	4:22	33:3,16 34:17	81:7	76:22 77:2	41:10,13,24	19:16 20:19
62:1,19,21,25	inherent 29:9	34:19 36:4	judge 61:5,8,13	78:3,9	43:25 50:3,20	21:17 24:9
63:22 64:2	inhibited 73:6	87:16	61:14	knowledge 46:5	51:14 56:10,15	31:5 43:11
84:2 89:11	inimical 65:1	invitation 32:20	judges 50:16	knows 8:12,15	60:8,14 61:9	55:12 62:12
independent	initial 42:16	invited 40:25	61:15,16,18,23	Kyi 57:24	61:21 63:1	68:5,5 72:7
20:6,11 42:20	initiative 31:19	involved 22:23	64:18	<hr/> L <hr/>	64:10 66:7,12	76:14,20
42:21 44:20,23	input 48:12	31:8,12 35:24	judging 49:15	label 88:9	67:1,8 68:4,18	looks 61:17
45:3,3,10,11	inquiry 17:11	49:25 51:11	judgment 10:3	ladder 6:21 17:9	69:4 70:3 73:9	63:13 84:23
45:15,19,21,23	24:20 38:19,25	77:17	judicial 36:2,18	language 17:16	73:20 75:20	Lord 1:3,4,8
45:24 46:1,3,6	41:22 45:6,7	involving 21:7	63:6	large 51:7,20	81:5,11,14	5:24 11:14
47:22 48:15,21	53:5 55:1	51:17	judicially 36:8	67:12 68:10	82:7,13 84:5	12:6,14 13:11
49:5,7,13	57:17 58:17	IPC 50:23 70:7	judiciary 60:24	72:8	84:11,21 85:1	13:13,20 14:7
59:15,16 73:4	65:13 67:3,5	Ireland 70:10	61:3 62:1,17	last-chance 54:8	85:7 90:12	15:1,18 16:1,2
74:8 75:5,25	67:10,15,18	Irish 70:18,23,24	62:19,23	55:15 56:19,20	91:2,8,10,13	16:5,12,15,15
76:11 77:23	72:22 76:15,20	71:7	July 61:17 62:15	latest 73:17,23	91:17,20 92:1	16:18 17:3,8
79:11,20,20	86:11,19 92:5	irritates 40:1	92:4	launched 18:25	Leveson's 16:5	17:10 19:19,24
83:10,19,21,23	instance 21:2	issue 4:25 7:7	junctions 33:19	law 24:13,16	levy 27:15	21:11 22:21
84:8,21,22,23	34:9 80:20	11:10 21:22	June 41:21 57:23	40:15 49:23	levying 30:11	23:4 26:25
85:2,3,16	insufficient 77:4	25:4 49:11	61:11	59:17 60:2,4,5	libel 37:1	27:20 28:18
86:12,18 87:11	insuperable	58:18 59:5	jurisdiction	lawyer 44:3	licensing 22:1,15	29:2 32:22
87:21	23:12 24:8	77:1 90:24	86:22	45:20	22:18	35:14,20 36:6
independently	integrity 23:7	issues 2:7 14:17	justice 1:3,8 5:24	lawyers 2:18	lie 85:25	36:21,23 38:7
83:8	intemperate	25:6,6 30:1	12:6,14 13:11	76:18	lies 35:13	39:6,11,20
independents	61:19	37:19,21 64:11	13:13,20 14:7	lay 48:18 70:24	likes 66:5	40:3,8,13,19
84:19	intended 3:9	82:10	15:1 16:1,5,12	lead 75:24 77:21	limit 15:3 16:13	40:19 41:10,11
independent-led	16:13,19 17:17	iterations 73:23	16:15,18 17:3	leadership 58:15	limited 27:4	41:13,14,16,24
46:3	intending 40:17	<hr/> J <hr/>	17:8 19:19	leads 7:1	limiting 22:8	41:24 42:4
indicate 3:18 4:6	intention 17:6	January 41:18	22:21 23:4	learn 70:13	limits 15:2	43:25 48:19
indicated 4:10	interest 9:7	47:11 68:13	26:25 28:18	learned 70:18	line 64:23 82:14	50:3,20 51:14
individual 3:5	11:19 12:16,17	90:9	32:22 34:1	learnt 52:5 70:11	lines 30:16	52:13,19 56:10
10:10 24:22	13:2 27:3,6,21	Jay 1:4,9 5:21,25	35:14,20 36:6	70:22	linking 71:4	56:15,16 58:13
28:16 29:11,17	46:2 47:7	11:16 13:24	36:21 38:7	leave 91:3	list 76:23 91:14	58:15 59:21
31:3 77:19,19	81:17 83:22	14:4 16:5,10	39:6,11,20	leeway 74:3	91:15,18,25	60:8,14,22
78:22 82:23	89:12,18,24,25	16:22 17:9	40:8,13,19	left 39:17	92:1	61:9,18,21
individually 51:1	interested 22:22	19:21 23:14	41:10,13,24	legal 23:19 24:8	listen 81:21	62:4,11,14,18
individuals	27:2 50:17	29:2 33:1	43:25 50:3,20	24:12,19 34:24	listening 67:25	63:1 64:10,12
27:21 28:3	interesting 54:1	36:13,22 38:17	51:14 56:10,15	37:19 49:23	litigation 37:6	66:7,12 67:1,8
30:18 66:24	interests 89:4	39:13,22 40:9	60:8,14 61:9	59:22	little 25:12 52:1	68:4,18 69:4
67:4	internal 29:2	40:14,18 41:11	61:18,21 63:1	legalistic 57:5	57:22 65:6	70:3,12 71:10
individual's	31:3 42:7	41:15,16 42:4	64:10 66:7,12	legislation 1:21	90:9	73:9,10,20,23
27:23	53:19 54:3	44:8 52:13	67:1,8 68:4,18	63:11,14 64:4	livelihood 23:9	74:1,10 75:8
industry 6:8 19:6	57:3 69:13	56:9,16 64:12	69:4 70:3 73:9	65:20,21,23,24	local 2:25 51:8,9	75:20 77:5,7
22:7 26:8 35:3	76:4,7 78:15	66:13 68:9	73:20 75:20	66:3,8,10 71:4	52:7 69:22	78:2,8 79:21
37:20,22 45:1	79:3,5,9 87:6	70:10 73:21	81:5,11,14	lessons 52:5	79:12	79:24 80:2,13
46:6,19 48:12	International	76:9 83:1	82:7,13 84:5	70:11,12,17,22	local/regional	81:5,11,14
50:12 52:10,16	51:21	85:12 90:15	84:11,21 85:1	Lester 77:7	70:9	82:7,13 83:2,7
52:19,22,23,25	Internet 68:1,2,5	91:2,3,9,11,14	85:7 90:12	Lester's 77:5	lock 16:23	83:13,15,15
53:2,7,11	interview 39:15	91:19,23	91:2,8,10,13	letter 32:12	lodged 70:2	84:5,11,21
58:21 73:5	interviews 39:23	job 42:19 77:15	91:17,20 92:1	letting 81:6	long 34:6,11 50:1	85:1,7,13,14
74:5,11,13	introduce 65:23	88:25	<hr/> K <hr/>	let's 91:13	58:10,15 64:18	85:18,21 86:25
75:2 77:13,25	introduced	John 61:5 65:6	keep 35:11	level 51:5 52:17	89:4	88:7,13 89:17
78:1,5,24	57:24 58:1	70:16	key 23:20 43:22	53:9 75:16	longer 6:6	90:12 91:2,5,8
79:19 80:7,14	65:5 86:20	join 21:14	48:22 51:4	87:3,6	long-term 37:11	91:10,13,17,20
80:16 81:2	introduction	journalism	53:20 57:8	Leveson 1:3,8	look 1:4,9 11:13	92:1
82:4 83:11,19	23:13 89:21	27:12 28:1,3	75:24 76:13	5:24 12:6,14	12:4 17:18	Lords 77:10
83:24 84:7,20	investigate 35:24	28:11,24	80:15 85:24	13:11,13,20	20:2 21:3,9	lost 68:10,11
87:12	investigated	journalist 21:22	86:2,6	14:7 15:1 16:1	23:25 24:6	lot 14:16 39:2
industry's 35:9	35:18	22:5 23:4,6	kindly 41:19	16:12,15,18	28:12 32:6,8,9	91:16
inevitably 37:5	investigation	38:11	Kingdom 58:2	17:3,8 19:19	38:1 40:5 68:1	low 38:12 39:4
influence 44:22	3:12 4:1,14,19	journalists 22:2	kite 25:1	22:21 23:4	71:9 72:9	lunch 4:17
52:4 86:3	4:20 7:17,23	22:11,13,18,24		27:1 28:18	73:23 83:1	<hr/> M <hr/>
informal 8:3,20	7:25 12:5				89:5	

magazine 21:23 52:9 74:13 87:7	46:14 49:6,7,7 54:16 55:2 83:10,11	moves 87:9 MPs 39:1,4 mutating 65:16	52:8 69:22 70:6 77:19 78:22	occupying 88:4 occur 2:22 occurred 61:2 occurs 2:23 offensive 61:19 official 32:2 officials 25:14 Oh 16:4 39:12 50:20 60:18 73:20 85:1 86:7 Okay 31:17 83:1 86:25 old 9:13 ombudsman 85:16,18,24 86:4,10,11,13 86:15,19,24 87:3,20,21 88:3,21,23,25 89:6 Ombudsmen 86:13,20 once 34:3 62:5 63:12 ones 19:20 25:6 67:11 online 52:9 77:20 onus 78:20 opacity 6:17 open 18:11 26:8 26:20 36:7 64:3,5 73:7 opening 1:9 43:6 operate 87:14 89:3 operates 71:13 89:4 opinion 15:9 24:20,21 opportunities 32:9,18 33:13 54:10 opportunity 32:17 33:2 34:5,15,18 54:15 55:7 64:5 77:8 opposed 41:3 option 55:5 orally 19:18 order 14:4 23:2 32:20 82:22 87:2 organisation 47:25 48:1 organisations 79:3 organise 79:8 original 35:7 44:12 originally 77:5 ought 42:18 50:11 55:5 outgoing 39:16 outline 80:1	outlined 17:7 outlining 26:15 outrage 57:19 outset 43:18 outside 47:23 overall 31:7 overcome 68:3 overly 34:11 overoccupying 76:17 oversight 57:4 59:18 78:17 overstated 33:20 overview 71:12 overwhelming 64:21 o'clock 92:6,8	part 5:15 25:15 25:20 28:23 29:4 32:20 41:20 43:23 46:13 51:2 53:21 57:5,9 81:1 86:13 participate 24:14 particular 3:6 27:11 29:6 38:3 50:9 51:10 60:21 61:8 62:12,16 72:2 75:22 76:3 78:19 80:22 82:9 particularly 9:10 11:25 42:18 47:6 53:1 67:25 77:9 82:18 partisan 82:15 parts 52:23 53:2 57:19 74:12 party 13:6,7,9,13 31:25 39:15 81:18,21,24 pass 45:14 passed 8:1 PCC 6:4,13 8:2 11:11 12:24 15:20 17:15 23:5 37:2 39:17,17 42:7 43:22 44:1 66:19 68:11 70:2 78:9 81:9 81:20 PCC's 11:13 penultimate 56:19 people 7:3 14:18 21:7,8 22:8 24:2 38:5 40:1 44:5 45:23,25 46:18 47:22,23 48:1,21 49:9 50:15 51:12 52:25 63:8 67:2,10,12 69:4,6 73:13 76:14,19 82:5 82:7 84:21,23 85:2,3,4,5,8 perception 49:11 49:20 perfect 71:6 perfectly 17:4 82:22 periodical 51:13 permits 82:15 permitted 66:9,9 person 31:13,14 35:15,22 45:24 59:15 82:9	
magazines 69:23 70:9 77:20 78:22 magic 52:2 main 52:23 maintain 46:14 maintained 52:18 53:10 maintenance 29:13 major 70:5 72:3 majority 48:6,21 59:16,19 64:21 68:25 79:20 making 7:11 8:9 11:2 26:1 29:20 31:2,6 89:22 manifestations 52:20 53:12 mark 25:1 material 1:11,14 matter 2:24 3:14 9:4 10:19 11:7 13:7 14:14 18:9,13,20,22 19:1,3,4,14 25:13 35:23 43:16 50:9 57:7 60:17 77:25 81:25 matters 1:18 12:21 20:11 23:10 44:4 maximum 4:13 87:24 McNae's 60:3 mean 12:6 40:10 50:16 58:5 68:4,19 87:4 means 33:24 53:17 57:14 63:1 meant 14:22 mechanism 76:5 77:23 media 50:24 55:1 70:7 mediated 68:21 76:25 mediation 2:4 9:15,18 10:5 44:14 54:5 69:1 MediaWise 38:18 40:2 meet 47:24 52:25 67:6 78:7 meeting 32:20 54:15 66:14 meetings 70:17 meets 20:13 members 23:25	membership 71:5 memory 81:6 mental 14:18,18 15:6 82:11 mentioned 39:14 merely 12:17,19 68:4 merit 11:8 met 26:16 48:3 49:20 67:4,20 million 5:10 9:11 9:13 78:10,11 mind 23:11 46:1 65:11 88:17 minimum 10:17 minister 30:16 61:6 ministers 25:14 63:2,5 64:18 minor 10:17 minority 48:8 58:6 minus 9:11 Mirror 51:22 mirrored 86:25 misleading 15:10 15:16 44:2 47:4 82:21 missed 54:11 mistake 37:7 misunderstand... 55:19 misunderstood 62:9 mix 47:22 Mm 2:3 74:5 Mm-hm 87:13 mode 8:21 model 73:23 74:1 79:21 88:14 modelled 83:16 module 38:18 41:22 moment 8:14,15 24:1,9 42:18 52:19 57:21,25 59:13 69:11 78:9 Monday 92:4 monitored 57:4 monitoring 59:18 months 38:8 morning 74:23 91:5,21 92:6 Mosley 65:9 mouth 11:2 move 10:7 26:5 41:11 53:5 55:16 60:19 62:19,21 90:11 90:11	N name 50:24 named 29:11,17 30:18 31:2 national 52:8 natural 34:1,1 naturally 49:15 nature 1:25 10:4 21:3 31:12 52:6 nearly 43:14 necessarily 15:8 34:10 56:1 85:3,4 necessary 7:8 30:21 52:16,21 53:8,12,15,23 72:13 79:9 87:16 90:8 need 2:9 9:19 10:11 13:10 16:25 22:13 47:21 53:4 56:1 59:16,17 60:23 64:8 69:3 73:3 81:15 88:20 90:18 needed 64:7 needs 32:6 33:23 44:19 64:7 82:2 never 22:13,17 43:16,23 64:9 64:13,24 72:5 75:7 90:12 new 6:2,3 7:4,12 10:3 17:17,23 18:18,22,24 27:2,3 29:5 33:21 35:24 43:1 46:9 48:4 48:7,14 53:18 69:11,12,17 72:12 74:8,15 78:4,10,13 79:18 80:21,25 82:1,24 83:22 84:4 88:14 90:21 news 23:18 24:2 24:3,4,5,12 51:21 newspaper 2:25 3:6,25 21:23 22:6,22 36:1 51:13 68:21 72:3,8 74:13 87:6 newspapers 2:21 31:9 51:7,8,10 51:20,22 52:8	nomding 16:2 nominated 31:15 nominees 84:7 non-contractual 71:13 norm 3:10 normally 12:20 norms 59:3,6,10 note 54:1 notification 32:14 notified 4:18 notion 71:23 notionally 40:6 notwithstanding 47:19 number 24:2 35:4 39:4 43:5 51:3 60:6 67:12,18 69:8 69:10,23 70:4 70:5 73:14 80:16,18,19 85:23,24 91:12 numbers 51:9 numerous 32:9	O oath 41:17 object 9:22 objection 10:24 26:15 28:7,25 objections 92:3 objective 75:3 objectives 27:5 76:12 objects 27:2,9,13 28:8 obligation 2:18 10:19 19:9 obligations 1:25 24:4,8 oblivious 58:5 observed 59:3 obsolescence 90:19 obstacles 24:13 obviate 2:9 obvious 8:20 24:16 38:24 54:21 obviously 3:7 12:22 21:7 22:5 24:12,17 41:25 69:7 73:22 87:5,14 occasion 43:12 65:18 occasionally 8:7 occasions 54:9 72:1 occupies 88:10 occupy 82:1 86:1	occupying 88:4 occur 2:22 occurred 61:2 occurs 2:23 offensive 61:19 official 32:2 officials 25:14 Oh 16:4 39:12 50:20 60:18 73:20 85:1 86:7 Okay 31:17 83:1 86:25 old 9:13 ombudsman 85:16,18,24 86:4,10,11,13 86:15,19,24 87:3,20,21 88:3,21,23,25 89:6 Ombudsmen 86:13,20 once 34:3 62:5 63:12 ones 19:20 25:6 67:11 online 52:9 77:20 onus 78:20 opacity 6:17 open 18:11 26:8 26:20 36:7 64:3,5 73:7 opening 1:9 43:6 operate 87:14 89:3 operates 71:13 89:4 opinion 15:9 24:20,21 opportunities 32:9,18 33:13 54:10 opportunity 32:17 33:2 34:5,15,18 54:15 55:7 64:5 77:8 opposed 41:3 option 55:5 orally 19:18 order 14:4 23:2 32:20 82:22 87:2 organisation 47:25 48:1 organisations 79:3 organise 79:8 original 35:7 44:12 originally 77:5 ought 42:18 50:11 55:5 outgoing 39:16 outline 80:1	outlined 17:7 outlining 26:15 outrage 57:19 outset 43:18 outside 47:23 overall 31:7 overcome 68:3 overly 34:11 overoccupying 76:17 oversight 57:4 59:18 78:17 overstated 33:20 overview 71:12 overwhelming 64:21 o'clock 92:6,8	P PA 23:18 24:1,4 24:10,12,23 25:15 page 1:9 2:5 3:15 5:1 21:15 27:1 32:10,19 52:14 58:20 pages 41:20 palliatives 57:12 panel 4:19 5:4 7:17,23 20:17 20:24,25 21:7 21:8,8 32:21 33:10,21 34:20 35:25 83:9,11 87:10,16,17 panel's 33:3,7 paper 32:7 38:24 45:4 papers 30:19 70:9 paragraph 5:19 5:19,23 7:18 8:2 11:13 13:20 17:10 21:14,20 25:5 26:5 37:18 42:5 43:8 52:13 53:6 55:22 58:19 59:21 65:14 66:13 71:11 77:11 79:16 83:5,6 84:11 88:16 89:9,12 89:15 paragraphs 37:24 90:15 parallel 1:24 50:13 64:1 pardon 6:4 48:5 Parliament 57:25 65:16,22 66:1 Parliamentary 61:11 63:18 64:4

86:1,4 88:10	policing 83:21	70:16 78:23	privately 9:21	propositions	push 2:11 44:25	real 6:5 29:19,25
personal 23:7	politicians 62:2	81:22	privilege 58:23	40:22	put 19:14 21:4	30:12 55:6
personality 86:1	Porter 34:24	probably 17:19	probably 2:24	proprietor 31:2	33:14,24 34:2	realistic 85:9
personally 71:25	portrayed 68:7	80:6	4:24 6:15	31:4	34:3,15 35:23	reality 9:9 31:4
76:9	position 14:24	presently 15:2	25:12 39:3,5	proprietors	38:10 42:17	really 13:3 15:12
perspective	18:18 47:16,19	63:19 78:17	39:24 41:9	30:17 31:10	49:3 53:3 54:2	43:10 45:14
45:19	51:20 72:18	press 6:16 12:1	53:20	42:11	54:6 55:7 57:6	53:1 56:17
persuaded 72:5	73:2,25 75:10	13:5,15 14:15	problem 15:5	prospect 35:14	60:24 71:16,23	57:3 63:22
pertains 4:15	75:13 88:5	21:19,24 22:3	23:12 27:9	36:11	72:6,19 77:22	64:6 71:21
philosophical	possess 53:8	22:10,14,25	29:4,7 51:14	Protection 65:3	78:8,8 80:2	72:5 77:17
62:4,4	possesses 52:16	23:8,10,15,24	64:6	proud 58:3,4	84:17 85:15	78:12
philosophy	52:20 53:12	25:7,19 26:1,3	procedures	prove 31:24,25	86:23 91:14	reason 11:21
25:15	possibilities 18:7	29:5 37:12	69:14	provide 4:18	puts 53:23 81:17	47:8 75:9,10
phone 37:5	possibility 12:7	40:23 42:21	proceed 24:17,18	23:15,19 24:3	putting 58:16	reasons 9:14
phrase 27:25	12:23	43:3,10,14,19	45:2 81:8	40:17 84:9	75:25 87:8	24:16 32:16
28:10	possible 2:8 3:7	46:11,14,20	process 6:10,12	provided 41:19		39:23 61:14
pick 43:6 83:5	8:7 23:14 26:9	47:17,23,23	8:10 9:18	53:15,16 78:5	Q	recall 60:20,24
picked 56:7	36:12 49:14	48:1,25 54:11	11:12,13 19:23	provides 77:15	QC 40:14	recalled 41:14
picture 40:5	72:10 80:4	55:2 57:18,19	21:4 29:7,21	providing 60:14	quality 45:11,19	receive 21:24
piece 45:4	81:4	58:1,8,10,11	29:23 34:11	62:6	76:11	74:14
pinning 57:15	possibly 7:6 10:9	58:11,14,24	35:8 38:7 42:6	provision 21:19	question 2:2	received 15:11
place 2:10 5:14	23:8 67:6	59:17 61:1	42:13 83:16	22:10,14 24:5	19:20 35:19	66:19 86:11
17:22 21:8	Post 51:17,19	62:7,8,21,25	processes 30:7	60:25 61:20	37:14 38:21	recognise 43:2
26:23 30:7,8	pot 9:12 78:2,11	63:3,18,19,22	35:3	provisions 19:13	47:18 67:1	58:21 75:5
30:10 32:12,16	potential 7:25	64:2,15,17,20	produced 83:8	73:3,7	75:8 81:15	84:19
34:21 53:19	14:13 58:16	64:21 65:12	professional	public 9:7 11:19	84:10	recognised 71:5
69:16	71:3	66:15 67:11,19	27:12 28:1,2	12:16,17 13:2	questioned 23:7	recognises 29:3
placed 17:25	potentially 14:17	67:23 68:7,10	28:10,23 46:15	27:6,21 29:23	questions 10:17	recognition 65:8
places 1:15	power 5:2,7 7:15	69:3 70:25	57:4 59:18	38:12 47:7	24:19 29:2	recollection
placing 2:18	7:21 11:18	71:7 72:4	Professor 65:6	57:7,10,11,16	32:21 40:7	89:16
play 42:5 43:22	56:4 65:23	74:25 79:3,13	70:16	57:19 58:8	41:15 61:8	recommend 84:1
players 51:23	86:3,14	79:21 82:20	prominence	60:7 76:1	quick 76:16	recommendati...
playing 88:1	powerful 50:15	84:23 85:4,4	17:14	81:17 83:22	quicker 2:13	19:12
pleasantly 42:14	powers 14:5,22	88:24,25 89:3	promote 27:11	84:3,5 85:10	quickly 79:15	recommendati...
please 1:5 62:9	43:20 74:8	90:4	promoted 61:13	86:8 89:4,12	quite 2:21 14:5	37:8 54:17,18
65:14 70:12	76:23	PressBoF 6:7	promoting 28:13	89:18,24,25	14:16 32:2	54:25 55:23
71:10 77:12	practice 1:21	34:23 36:25	promulgating	publication 15:9	33:20 51:12,23	71:12
79:16 89:14	10:9,21 11:8	37:1,17	5:14	17:12,20 18:2	55:4 58:18	recommended
plenty 45:20	13:22 25:20	pressures 77:21	proper 18:15	18:6 20:6,10	64:6 67:9 69:1	74:17
plough 34:20	27:14 28:14,15	presumably 21:4	44:10 54:23	20:13,21 26:12	70:14 75:11	reconsidering
plus 78:11	28:23 29:14	36:6	60:11 69:19	publications	78:18 91:16	77:9
pm 1:2 56:14	37:3 83:17,17	pretty 8:20 61:5	71:21	22:9 23:16	quote 56:3 62:13	record 90:2 92:5
92:4,7	practices 29:5	64:16	properly 44:9,19	24:23 52:9	quoted 70:5	recorded 6:19
pm)break 56:12	47:16 54:13	previous 41:25	67:22 69:3,13	69:24 70:8		recuse 49:16
Pods 44:20	preamble 46:16	previously 9:1	77:16 86:4,10	72:1	R	refer 37:8 42:6
point 4:16 5:16	precepts 59:4,7	pride 57:18 58:5	88:3 90:13	public's 27:19	raised 7:7 10:17	46:16 59:21
9:7 13:16 16:5	59:10	58:7	proportion 69:4	publish 82:20	37:3 40:14	60:3 66:13
17:9 21:10	precise 26:10	prima 10:15 21:6	proportionately	published 1:12	54:20	77:11 83:7
24:18 25:10,21	73:10	primarily 8:3	33:23	7:19 8:4	raises 7:2 64:11	89:15
28:12 30:4	precisely 1:21	primary 8:21	proposal 5:18,23	publisher 2:1,12	range 20:19 51:6	reference 28:5
33:12 36:10	17:16 88:16	64:5 65:21	5:25 19:17	3:1 7:2 18:16	rare 89:25	65:4,9
38:10 39:5,7	prediction 49:8	66:8	21:15,20 40:16	21:24 30:8,9	ratifying 19:11	referral 5:3 7:1
39:24 40:1,14	prefer 69:25	prime 30:16	42:1,16 44:12	30:13,24,24	ration 91:4	7:16,22
43:6 50:19	75:3 77:22	principal 85:17	45:11,16,18	51:5 76:5,6,7	reach 34:7	referred 9:12
63:20 65:19,20	79:13	principle 1:20	83:2,2,6,14	publishers 2:16	reached 33:15	32:25 33:1
67:8 71:12	preferable 74:2	11:6 64:14	85:12,13,14,21	29:19 42:16	57:14 72:19	38:7 44:12
75:1 77:12	preference 73:21	66:4 80:18	87:1,1	53:22 54:3,22	74:13 75:10,13	46:23 51:24
78:8 79:1 80:3	preferred 37:15	89:10	proposals 41:6	69:18 71:17	85:22	60:20 83:13
84:14 85:12	preliminary 33:3	principled 10:24	74:6,23 75:11	72:16 75:18,20	read 17:3 37:2	referring 47:3
pointed 31:17	33:8	principles 65:1	75:15 76:10	75:23 77:19	47:19 91:15	48:19 55:8
37:2	premise 53:6	89:9,10	79:25	publishing 72:8	92:4	56:22 62:10
points 17:11	prepared 1:7	printed 1:15	propose 41:2	purpose 16:22	readily 63:21	reflect 52:7,11
19:17 33:25	12:23,24 41:1	26:1	84:12	40:21 63:10	reading 17:5,6	reflected 1:22
36:22 40:3,10	85:7	privacy 27:23	proposed 80:14	80:11 89:6	28:21 61:2	reflection 90:6
43:7,7 80:25	present 12:19	28:16 37:1	proposing 6:20	pursue 38:21	91:11	reform 37:9
policed 57:3	43:15 68:2	60:5 72:3	80:13	40:4	reads 63:25	60:21 63:17

refusal 4:18,20	44:5,23 45:10	20:22 21:3	23:9 26:17	13:17 15:21	46:4 47:24	similar 36:18
refuses 4:17	45:21 47:21	32:9,17 33:18	27:19 28:21	82:19	48:2,15 59:14	57:12 60:25
regard 9:10	48:2 52:10	34:6 35:2	34:2,3,21	scene 72:9	73:4 74:9 75:4	64:17 66:21
27:17 28:4,20	54:23 55:9	representatives	39:11,11 44:20	schema 19:25	77:23 82:1	67:13 71:4
51:25 60:23	60:19 66:20	79:19,21 80:17	48:11 49:21	scheme 22:16	senior 29:11,17	similarity 83:3
regarded 4:21	69:12 72:13,16	reprimand 6:24	50:22,24 53:3	23:3,13,23	31:13,15	simple 2:21 3:1
86:5	74:2 77:14,17	7:19 8:8	53:15,19 55:7	24:6,17 27:14	sensible 12:10	8:23 64:6 73:1
regarding 14:17	77:20,22 78:13	reprimands 8:5	58:23 70:14	82:16	sent 33:3,8	73:16 74:7
24:4	79:18 80:5	request 33:6	73:19 75:8	scrutinised	sentence 2:5	75:3 80:4
regards 54:12	88:14	requesting 40:21	78:18 80:12	76:10	25:11 28:7	simply 74:1
regime 48:15	regulatory 18:24	require 7:15	81:9 82:2 85:5	scrutiny 29:24	38:4 58:19	simply 15:7
64:17	25:17,21 27:14	65:21 88:15	86:9 89:16	64:4	separate 25:22	16:11 22:8
regional 51:8,10	32:13 43:20,24	required 59:11	90:11 91:10,13	seamlessly 41:11	September 24:11	44:2 90:20
52:7 69:22	44:4 45:5,15	requires 58:21	91:17	seat 57:24	24:24 55:21	single 3:24 4:9
79:13	48:18 49:22	77:2 89:17	rightly 11:16	second 2:5 5:21	serial 3:17 4:10	12:12 14:12
regulate 1:11	53:16,18 57:3	requiring 59:2	32:2	21:16 77:11	serious 3:19,21	34:18 74:24
44:23	59:8,22 65:11	reserved 72:18	rights 27:20,22	secondary 1:21	4:9,9,21 7:1,24	sir 12:11 14:16
regulated 1:12	69:11 71:5,21	resides 5:2,13	27:23 28:3,5,6	64:5 65:20,23	10:16 30:18	16:17 17:6
2:6,19 3:19	74:18,21 80:22	resolution 7:19	28:9,16 29:1	65:24 66:2,9	31:24 33:20	23:1 28:25
4:17 5:8 29:12	82:24	8:3,20 9:22	37:9 65:3	secondly 30:3	34:13 37:10	35:19 39:10
32:8,13 33:4,9	Reid 61:5	15:24	ring 38:22 39:22	42:24	78:20	41:8 54:7,10
33:13,18,22	reiterated 73:15	resolve 2:6 87:9	road 57:14	Secretary 61:5	served 89:18	60:18,20,24
34:7,14,17	reiterating 35:11	resolved 6:19	robust 9:6	61:15	services 1:16	62:10 67:4,17
36:7,15 62:7	rejected 69:5	68:25 79:15	role 11:23 25:11	section 12:1	49:23 86:19	73:19 80:9
74:3	rejoice 38:12	resolving 76:17	43:22 73:11	63:16 69:21	servicing 6:6 48:6	85:6 91:22
regulates 83:24	relate 40:12	respect 12:14	86:2 88:10	89:8	48:8,24 79:22	sit 49:2
regulating 44:20	relates 17:12	31:12 88:18	roughshod 9:24	see 4:11,25 8:4	set 1:23,24 9:11	sitting 31:5 41:8
86:12	80:16 81:6	respecting 62:24	Royal 55:20,21	9:25 10:24	18:23 26:18	41:8 51:16
regulation 2:3	83:3	respects 6:5	56:6,10	16:22 19:4	28:15 29:1	situation 48:11
3:11 4:16	relating 10:10	respects 83:14	ruffle 39:25	23:25 24:6,23	31:21,23 32:11	66:21
11:16 12:11	relation 11:10,11	response 57:16	rule 16:2,6,22	26:15 27:13	40:11 60:6	six 34:4
13:24 15:2	24:13 25:7	58:14	rules 23:5	28:4 33:17	61:14 70:20	sixth 89:10
16:11 25:23	27:13 29:4	responsibilities	run 50:1	44:4,9 45:10	71:20 72:9	skill 44:7
31:18 32:4,10	41:6 77:1	58:12 78:19	runs 41:20	45:16,21,22	73:4 74:6,7,18	slow 59:17
32:19 33:5,7	79:17 88:21,22	responsibility		46:19 48:3	75:11 76:6,13	small 2:23 43:4
33:10 43:12,15	relations 72:16	5:12,16 31:7	S	50:23 51:5	77:5 78:3	50:14 51:2
44:7,9,19	relationship 3:5	37:17 53:23,25	saddened 66:15	53:3 71:3 73:2	setting 26:11	52:1 58:6
45:12,19 59:24	31:1 70:15	58:18 78:22	safeguards 60:6	75:2,10,16,20	32:15 47:7	69:10 70:4
60:1,10 64:8,9	72:23 77:13	89:1	saloon 54:8	75:22 76:16,25	54:4 76:4	smaller 70:8
64:13,25 65:24	relative 39:5	responsible	55:15 56:18,19	79:18 81:3	seven 34:4	smoothly 30:1
76:11	relevant 4:6,7	28:13 29:12,17	56:20,21 57:7	82:3,15 86:25	severely 61:6	snapshot 35:12
regulations 1:4	6:7,12 8:1	30:17,23 34:22	saloons 56:18	87:2,21 88:7	shared 75:4	society 25:16
1:10,22,23,24	17:20 18:6	58:10 59:2	Samaritans	88:23 91:17	sharp 73:16	27:18 49:24
5:15 10:14,24	22:7 79:2	88:25	67:23,25	seek 46:8 80:15	Shawcross 74:17	67:21 86:20
11:14 15:14	remainder 19:16	rest 4:24 56:4	San 57:24	81:2	short 2:25 3:2	solicitor 50:8
19:2,4,5,5	remarkable	63:17	sanction 5:2 7:10	seeking 35:25	56:13,17 59:9	61:10
26:17,21 29:10	74:10	restore 57:9	7:25 30:12	51:5	66:20 73:1,16	solicitors 49:22
32:8 34:22	remarks 43:6	result 2:22 19:10	34:13	seeks 26:10	78:10	49:24 50:4,18
72:21 73:24	remedied 6:23	78:16	sanctions 4:25	63:21	shortcircuit 23:2	51:25 52:1
75:12	remedy 36:13,13	results 42:12	6:16,22 7:14	seen 36:23 49:13	shorter 74:1	solution 41:3
regulator 1:10	remember 14:15	return 40:22	17:9 44:10	56:10 60:4	shortlist 83:8	58:16 76:19
1:11,17 2:17	17:15 38:20,23	returning 41:16	46:7	73:11,18 75:17	show 11:20 16:8	87:22
3:8 5:17 6:4,21	50:6	returns 68:14	satisfaction	76:10 86:7	16:9 67:21	somebody 39:12
7:4 8:25 9:6,24	remind 38:16	reverse 37:10	68:16	92:1	sign 30:25 53:22	84:22,23
10:3,8,15,20	64:15	review 20:24	satisfied 69:2,12	Select 36:25	64:22 71:17	soon 8:20 60:18
10:22 11:17	remit 1:10	33:6,7,10	76:9	self-evidently	74:25 75:15,19	64:3
12:12 13:5,8	replication 71:6	35:16 36:2,5,8	satisfy 69:13	46:23	signed 21:25	sorry 18:5 35:20
14:5,12 17:15	reply 32:14	36:18	Saturday 76:1,2	self-explanatory	22:6,6 23:16	41:6 66:18
17:18,23 18:2	report 2:25	reviewing 54:8	save 71:15	4:24 25:2	25:19 41:21	sort 7:9 10:13
18:4,10,11,15	15:21 54:7	Reynolds 34:24	saw 3:12 13:4	self-regulation	80:8	24:14 25:5
18:20,23 23:17	55:22 72:3	Reynolds-style	43:16 73:14	21:25 26:2,3	significant 3:17	33:16 38:24
26:8,13,19	reportage 15:10	71:4	saying 18:8 32:4	43:9 52:15	11:19 12:15	59:17 64:1
29:14,15 30:6	reporting 8:24	ride 9:24	50:25 58:25	53:10,13,14	13:2 14:5,7	66:24 80:4
30:11,15 31:14	14:18 24:10,24	right 3:9 6:25	60:22 63:15	58:21 59:8	16:9 81:16	83:18 91:3
33:21 36:15	29:14	16:5,24 17:24	67:16 85:18	71:2	significantly	sorts 22:13 26:16
42:23,24 44:2	representations	20:10,10,22	says 12:20 13:16	self-regulatory	37:22	64:11

sought 44:1,24 70:19 87:10	starting 80:2	84:2	15:19 16:15	23:1 30:6,11	26:17,19 28:9	42:23 47:10
sound 11:3	starts 31:18	structural/fina...	18:7 29:25	32:16 34:6,17	29:8,19 30:6	52:6 55:7
sounded 11:2	46:12	37:21	30:13 31:6	36:2 37:17	31:1,2,11,23	56:22 59:14
Southampton	state 42:5 61:12	structure 43:24	35:19,20 39:2	41:4,5,12	32:1 33:17,19	60:3,16,20
51:16	83:25	45:15 46:4,9	39:7,9 40:20	44:25 46:25	33:22 34:9,12	61:2,11 65:5
so-called 44:9	statement 1:5	48:14,18 49:22	41:1 44:6 52:4	50:14 52:2	34:16 36:9,23	66:13 68:2
88:3	3:10,13 5:24	53:16,18 59:15	54:25 55:4	58:18 69:21	38:1 39:1,4,6,7	71:20 72:2
space 37:25	17:10 29:3	62:22 71:6,21	69:19,24 70:25	72:14 75:24	39:17,24 41:17	74:16 75:4,6
spanner 33:14	38:9 39:10	73:4,24 74:9	surmounted	82:20 90:15	42:18 43:2,17	76:17 78:23
speak 49:4 71:21	41:20 42:6	74:18 75:4	24:14	taken 11:22 14:3	43:25 44:3,16	81:22 89:19
speaking 44:3	43:8 44:24	76:8 78:4	surprise 57:23	35:1 44:25	45:14,25 46:9	90:3,19 91:2
48:25 61:16	45:13,17 52:13	80:22,25 81:4	surprised 42:14	57:21,22 72:17	46:11,24 47:1	times 27:17
68:25 69:24	58:20 59:21	82:1,24 87:19	43:20 54:19	91:25	47:2,11,21	28:20 34:4
speciality 44:4	65:15 70:20	87:20,22 88:5	surprising 33:14	talk 15:18 62:6	50:1,18,24	40:19 47:14,15
specific 10:10	71:11 77:11	89:7	surprisingly	talking 8:9 15:4	51:3 52:11	titles 69:20
12:8 22:9	78:3 79:17	structures 45:5	71:16	48:23 50:9	54:14 55:11,19	today 35:6 91:12
40:10 65:9	83:5 88:16	52:16,21 53:8	suspect 29:9	51:3 68:24	55:25 56:16,22	told 17:4 33:6
specifically	statements 91:12	53:24 59:23	37:16	75:23 81:12	57:2,6,8,11,15	55:3 65:17
24:22 83:7	92:2	stuck 38:9	Suu 57:24	targets 26:12	57:18,20 58:6	68:12 79:7
specifics 70:24	static 47:5	study 23:18,21	sword 56:23	task 49:21	58:13 59:16	81:9 89:23
speculate 72:23	statistics 6:24	80:10	symptomatic	taste 1:18 15:8	60:18 61:9,23	90:1
speech 60:12	8:24 26:12	subject 1:12	2:20	team 80:9	62:10 63:3	tomorrow 91:5
61:23 63:9	status 27:3,6	10:10 47:4	system 8:21 9:2	teeth 42:24	64:3,12,15,16	91:21 92:5
spelled 29:9	statute 1:25 56:1	50:8 53:5	9:3,11,13	tell 61:21 67:14	64:21,23 66:23	top 14:23
spend 12:8	60:2,15 61:25	58:16 73:8	12:19 17:17,23	68:9 86:21	67:9,18 69:17	topic 82:8
spent 61:2 66:14	61:25 62:5,11	submission 22:3	18:18 21:18,25	term 36:14 88:3	71:25 72:7,8	total 78:1
spoke 66:24	63:10	36:24 37:8	22:1,18 24:1	terminology	73:2 74:9 75:8	trade 6:8 22:7,20
spoken 25:24	statutory 55:10	38:18 39:14	25:22 26:6	86:16	76:14,18,19,20	trail 47:9
68:9	55:18 57:15	submitted 36:9	29:6,9 30:13	terms 2:14 24:4	76:22 77:20	translated 9:9
squarely 53:24	59:24 60:1,19	subsection 60:22	32:2 36:9	25:20 36:10,18	78:4 80:20	70:25
staff 42:7	64:1,7,13,24	subsequently	43:11,15,15	42:4 44:8	81:6,17,25	transparency
stage 26:18	65:11 77:2	74:3 91:25	44:8,10,18	47:22 48:3	82:22 83:13	2:15 26:6
68:22 82:17	steer 45:1	subsidiary 27:13	48:4,7 49:13	55:9,11 73:24	84:5,15,18	transparent 7:11
stages 36:7	step 25:24 52:12	substantial	49:17 52:4	74:8 75:11	85:24 86:23	8:10,25 26:9
stand 19:21	72:17	12:16 13:2	53:23 54:3	90:22,24	89:15 90:4,6	26:20 29:22
37:14,18 38:3	steps 41:5	14:8 81:16	55:12,14,16,18	terrible 56:22	90:10 91:3,7	travelled 70:10
38:13 79:25	stick 40:1	substantive 7:8	57:3 59:8	terribly 12:10	thinking 55:9	traveller 15:22
standards 3:12	sticks 21:17	subterfuge 47:2	60:10 64:24	39:6	third 13:6,7,9,13	treated 11:25
3:18 5:3 11:24	stipulations	successful 91:7	65:12 69:11,19	test 40:22 45:15	44:16 76:15	67:22
12:3,9 27:12	74:21,21	sudden 63:13	70:18,23 71:13	57:8,9 72:6	81:18,21,24	treatment 66:19
28:1,2,10,24	stop 63:2,5	suddenly 58:4	71:15 72:9,12	87:2	thirdly 42:25	trends 31:5
29:13 30:4,19	stopped 30:8	suffered 66:14	76:11 83:18,19	tested 89:20	third-party	tried 18:21 45:2
31:21,21 32:5	stories 66:16	sufficient 71:3	84:1 85:9,25	thank 1:8 3:11	11:18 14:2,13	57:3,6 63:4
33:21 35:16,23	67:14	77:15 78:6,12	86:6,13 87:4	5:18 19:16	81:15	trigger 4:1,14,20
37:3 40:23	story 18:17 39:1	80:5	88:22 89:3	40:8,13,18	thorough-going	4:20 12:4 30:2
44:13 46:10,15	39:2	suggest 45:4 56:6	90:19,20,24	41:13,24 42:3	83:16	triggered 3:12
46:17,20 52:17	straight 55:16	84:11 88:13	systemic 3:15,19	56:11 92:2,5	thought 10:15	triggering 36:4
53:9 54:4	58:2	suggested 77:8	3:21 4:7,8 12:2	theme 90:15	38:5 54:21	Trinity 51:22
59:19 64:20	straightforward	suggesting 59:13	20:19 30:5	theory 36:12	58:4 66:1	truck 22:17
76:4,21 78:19	3:1 6:22 25:9	suggestion 31:20	78:20	things 9:19 10:1	87:24	true 43:9
79:5,9 81:1	25:12	71:17	systems 30:9	26:16 38:1	thousand 50:5	truly 46:3 60:16
83:22 85:17	straightforwar...	suggestions 73:7	52:17,21 53:9	39:20 55:7	thousands 70:8	trust 4:13 5:2,7
87:15 90:6	11:4	79:25 80:1	53:24 79:5	71:18 80:23	threatened 72:3	6:3 19:11
standard-setting	strength 46:5	summarise	85:23	think 2:20,22 3:3	three 1:10 3:12	20:22 21:1,2,5
78:16	strengthened	11:12 57:20	T	4:2 5:12 6:2,9	21:7 35:2 38:2	26:9 31:18,22
standing 37:23	46:20	70:12,21	t 62:9	6:15 7:9 8:5,14	54:9 61:14,14	32:4,6,25
stands 15:16	strengthens	supply 78:6	tab 1:6 26:25	8:23 9:16,18	79:21 87:17	34:15,19 36:3
start 3:9 8:12	14:24	support 24:1	table 55:5,6,17	9:23 10:13	threshold 10:14	36:5 48:20
27:1 43:1	stress 42:19	26:1,3 32:4	tabled 24:20	11:1,4,15,20	16:7	57:9 75:5
60:19 71:11	44:24 58:13	87:25	take 3:9 9:6,19	11:23 13:4,6	tie 18:24	77:14,15 80:17
78:12 84:17	strictures 59:23	suppose 36:12	10:20 11:18	14:7,11,23	tier 85:19	83:4 84:3,6
started 35:7	stringency 9:15	47:25 57:1	12:13 13:6,9	16:5,10,10	time 4:4 12:2	86:8 88:4
42:19 62:5	stronger 50:13	59:5 63:23,25	13:18 14:5,12	17:14,23 18:20	14:15 29:16	try 2:6,11 18:23
63:12 72:24	50:21 59:11,14	74:6 75:7	15:20 17:2	19:23 21:1	34:7,12 37:25	34:18 48:13
84:14	60:8	81:11	20:11 21:10,19	22:14,16 23:11	38:6,11 39:25	63:21
	strongly 44:21	sure 12:18,25		24:5,18 25:23	39:25 40:5	trying 2:14 39:24

52:6 turned 69:10 turnover 5:9 two 10:1 11:15 29:8,19 36:22 44:13 48:3 56:18 79:18 83:10,10 two-page 74:7 types 7:10	<hr/> V <hr/> valid 15:12 50:19 valuable 48:12 49:8 70:11 value 48:10 61:23 66:8 variant 55:15 various 1:15,16 5:5 7:5 8:13 22:16 27:13 55:17 60:5,5 vast 59:19 veal 4:3 venerates 60:11 Vera 61:6 veto 84:7,19 victim 20:18 victims 20:19 28:16 46:18 66:14 67:7 68:9 view 3:3 20:8 24:10 25:21 26:19 41:5 42:23 49:24 57:21 72:22 73:17,19 84:15 86:23 views 66:25 74:12 75:25 76:1 79:10 82:25 VIII 66:4 virtually 43:21 75:17 visit 70:13 85:22 visualise 12:6 vitality 80:20 volumes 60:5 voluntary 21:18	12:3 16:6 23:7 26:2,10 38:5 42:22 53:16 57:1,19 58:15 60:9 62:23 63:4 68:6,17 72:15 73:5,19 76:17 77:5 81:8 82:10 84:15 85:6 87:23 89:5 90:1,6 ways 7:5 8:13 11:15 14:20 63:23 68:3 74:6 weakens 14:25 weaker 60:8 website 91:14 week 38:1 65:6 weeks 75:17 welcome 53:25 69:18 went 11:3 50:23 we'll 26:4 71:9 75:7 we're 2:14 20:1 20:19 40:17 43:11 50:15 51:3 62:12 91:5,11 we've 2:3 9:12 19:23 38:6 40:24 48:22 57:12 63:4,4,6 68:13 74:23 75:6,10 76:10 86:11 whichever 5:11 whilst 55:23 whistle-blowers 81:12 whistle-blowing 80:21 who've 66:14 67:2 wide 11:4 wider 4:5 widespread 3:17 willing 25:18 71:17 72:14 76:6 willingness 53:22 58:12 71:20,22 75:18 WIRRELL 41:14 wish 26:8 42:1 46:19 47:11,13 53:22 58:8 65:19 73:15 81:23 wished 10:18 wishes 9:20,25 10:5 14:6 26:13 81:2,21	wishing 81:24 withdraw 72:4 72:11 witness 1:5 3:13 41:19,25 word 12:2 84:17 89:6 wording 17:1 77:7 words 14:7,11 28:21 41:4 46:12 70:21 88:1 work 22:9 24:7 26:2 27:5 29:20 38:24 42:1 45:4 48:16 53:13,14 56:21 62:22 68:2 73:5 76:8 78:13 worked 39:3 working 21:12 34:24 39:15 49:21 50:11,12 70:15 85:20,25 works 20:1 22:21 30:14 33:14 37:2 world 37:25 64:17 worse 37:22 wouldn't 2:17 10:24 19:6 38:9 46:24 57:17 64:14 65:2,12 71:6 79:6 write 15:4 40:11 writing 10:22 40:11 written 10:14,23 11:1 19:8 32:12 38:2 63:3 wrong 2:25 13:18 15:23 63:8 64:14 67:9 wrongly 17:5	<hr/> Z <hr/> Z 13:18 18:12 <hr/> 0 <hr/> 00037 27:1 00052 1:9 00053 2:5 00056 3:15 32:10 00058 32:19 00063 5:1 00089 5:22 00090 17:10 00099 21:15 00801 52:14 00802 58:20 <hr/> 1 <hr/> 1 5:8,10 14:19 15:15,25 16:8 16:14 47:5,11 63:23 64:10 82:18 90:9 1.1 5:5 1.95 9:13 10 28:5 47:1,3 92:6,8 10,000 50:18 100,000 9:12 78:12 118,000 50:18 52:1 13 59:21 87:11 14 32:14 33:4 14,000 50:6 15 16:23 42:14 76:13 15,000 50:6 69:22 70:3 16 61:11 17 21:21 49:1 18 61:17 1811 55:21 1947 54:9 1949 54:18,25 1962 54:19 <hr/> 2 <hr/> 2 20:1 42:5 78:10 92:4 2.00 1:2 2.1 5:6 2.2 5:10 2.25 9:11 78:11 20 43:13,14 46:21 47:13 65:14 66:13 2003 39:17 2004 39:16 2006 61:4,11 62:15 2009 36:25 37:15 37:22 71:8 21 57:23 25 3:11 25.1 3:15	26 31:18 71:11 260 68:12 27 32:10 77:11 28 79:16 83:5 <hr/> 3 <hr/> 3 1:16 60:21 3.25 56:12 3.3 1:18 3.35 56:14 30 50:10 31 4:16 41:18 63:16 32 32:22 325 55:22 35 89:9 36 32:19 33:2 63:17 88:16 37 89:12,15 38 37:18 39 37:24 90:15 <hr/> 4 <hr/> 4 38:18 62:15 92:4 4.36 92:7 40 5:19,23 33:2 37:24 50:10 40,000 50:4 41 90:16 43 7:18 8:2 17:10 44 33:5 47-page 45:13,17 <hr/> 5 <hr/> 5 26:25 27:16 28:19 50 41:20 51 33:7 53 33:10 <hr/> 6 <hr/> 6 1:6 60:22 60 50:25 51:2 55:17 57:13 70:7 62 55:19,21 56:6 65 21:14 66 21:20 69 25:5 <hr/> 7 <hr/> 70 57:13 71 83:6 84:11 <hr/> 8 <hr/> 8 2:3 28:5,8 29:1 41:21 43:8 80 68:15 80,000 51:25 83 26:5 <hr/> 9 <hr/> 9 11:13,16 12:11 13:20 15:2	16:2,6,22 52:13 53:6 58:19
--	--	---	--	--	---	----------------------------------