

Witness name: Adam Richard Cannon  
Dated: 12 October 2011  
Filed in response to a notice dated 8 August 2011

**The Leveson Inquiry into the culture, practices and ethics of the press**

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**WITNESS STATEMENT OF ADAM RICHARD CANNON  
EDITORIAL LEGAL DIRECTOR, TELEGRAPH MEDIA GROUP LIMITED  
12 OCTOBER 2011**

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I, Adam Richard Cannon of Telegraph Media Group Limited, 111 Buckingham Palace Road, London SW1W ODT, will say as follows:

1. I joined Telegraph Media Group (**TMG**) in June 2010 as Deputy Legal Manager. On 1 August 2011, I was appointed Editorial Legal Director, taking over from Arthur Wynn Davies following his retirement.
2. I make this witness statement in response to the Leveson Inquiry's notice sent to me on 8 August 2011 (the **Notice**), with particular reference to the questions raised in the Notice. In accordance with the terms of the Notice, this statement addresses my experience at TMG since I joined in June 2010.
3. I am informed that TMG do not intend to waive privilege over the advice which I and my Editorial Legal Department have provided. The privilege afforded to such advice is fundamental to the relationship between the editors and reporters on the one hand, and the in house lawyers on the other. In particular, editors and reporters are willing to refer issues to, and seek legal advice from, the Department on the basis that it will remain

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privileged, and will not be revealed to third parties (absent any court order). To choose to waive privilege voluntarily could, as such, seriously jeopardise the effective operation of, and provision of advice by, the Department, which neither TMG nor I consider desirable. The consequence of this non-waiver of privilege is that the examples which I am able to provide to the Inquiry of occasions on which I have advised are necessarily limited.

4. The Notice has requested that I provide certain categories of documents to the Inquiry. In so far as responsive documents exist which are not subject to privilege, those documents have been collated and are being provided to the Inquiry in response to the Company Secretary's notice.

***Question 1: Who are you and a brief summary of your career history in the media and as a lawyer.***

5. I was called to the Bar in October 1997, having obtained my degree from Magdalene College, Cambridge and Bar Vocational Training from Inns of Court School of Law. I was a pupil at Queen Elizabeth Buildings (Ian Karsten QC) and then a tenant at 96 Gray's Inn Road (Rt Hon Denzil Davies MP) from October 1998 to April 2000 and then 4 KBW (Robert Rhodes QC) from April 2000 to October 2001. During my time at the Bar, I libel read for the Associated Newspaper titles and lectured law at Westminster University. I left the Bar in October 2001 to become Group Legal Advisor at Associated Newspapers, where I remained until I joined TMG in June 2010.

***Question 2: What [are] your responsibilities as in house adviser?***

6. A copy of my job description has been disclosed to the Inquiry. My overarching responsibility as Editorial Legal Director is to ensure that my Editorial Legal Department is able to provide the Telegraph Media Group's editors, departmental heads and journalists with legal advice and guidance 24 hours a day, 7 days a week, 364 days a year (we do not publish on Christmas Day).

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7. Apart from me, and the secretary which I engaged in October 2010, the 24 hour a day legal service is provided by a number of long serving, part-time lawyers. The department is situated on the main editorial floor and is accessible to all journalists.
8. TMG has two legal departments, and it is necessary to distinguish the responsibilities of the Corporate Legal Department, headed by Kate Teh. The Corporate Legal Department is primarily responsible for advising the commercial side of the business. It has some responsibility for matters which affect the editorial side of the business, for example drawing up the editorial contracts of employment, and advising on the Bribery Act 2010, but such overlap is extremely limited. It is, by contrast, the Editorial Legal Department's responsibility to advise, and provide legal services to, the editorial side of the business, the Department's responsibilities being split between pre- and post-publication of the newspaper.

Pre-publication responsibilities:

9. The Department's lawyers are required to advise and assist editors and journalists at any given stage of the pre-publication process in maintaining adherence to the law, as well as to the PCC Editors' Code of Practice (the **PCC Code**) and the *Reynolds* principles of responsible journalism as follows:
  - a) We review and comment on content, mainly via email but sometimes orally. In particular, as production deadlines draw close, the lawyers often need to be on the editorial floor, approving page proofs or suggesting changes to be directly inputted onto the page. Most comments or changes proposed relate to libel, privacy or copyright issues.
  - b) In addition to commenting on content, I am also asked to advise editors or journalists on more general matters, often at a much earlier stage of the production process. Advice might be given over the phone, or the editor or journalist might drop into my office or stop me in the corridor

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or as I walk past their desk. Sometimes the journalists might be planning a story and be seeking advice regarding their proposals for gathering information, other times they might be starting to think about an article and want to discuss libel risks, or whether they have sufficient evidence to advance a particular line of argument. The advice can be wide ranging, and it is the Department's responsibility to ensure that the editorial team are properly informed and advised on whatever matters they raise.

10. My Department's responsibility is advisory only. It is required to ensure that the editorial team are properly advised regarding the risks that a course of conduct could breach the law and/or PCC Code, and the liability which might flow from such a breach. Once that advice is provided, my Department retains only a residual responsibility to escalate matters in circumstances where the decision how to proceed is being taken by insufficiently senior members of the editorial team<sup>1</sup>.
11. Other than the daily legal advice referred to above, the Department is also responsible for advising in respect of any injunction against publication which is threatened against TMG. In the event of a serious threat, I will be responsible for arranging input from external legal advisers and/or Counsel, as required. Further, in the event of any injunction or other restriction on publication of a story or pictures, the Department is responsible for ensuring that the editorial team is advised of the restrictions<sup>2</sup>.
12. The final aspect of the Department's pre-publication responsibility is to assist with the drafting of any editorial related contracts and agreements, for example book serialisations and confidentiality agreements.

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<sup>1</sup> If escalation was required, matters would be escalated to the Editor (Tony Gallagher for the Daily Telegraph, or Ian MacGregor for the Sunday Telegraph), or to Richard Ellis' department (Executive Director, Editorial), or to all three, often on an informal basis.

<sup>2</sup> See further paragraph 35 below.

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Post-publication responsibilities:

13. Post publication, my department is responsible for dealing with most complaints received by TMG in relation to material in the Daily Telegraph, the Sunday Telegraph and telegraph.co.uk, including blogs. Complaints reach TMG by a variety of different routes and vary in their seriousness. The main routes are: solicitors' letter to the relevant editor, letter or email of complaint directly from the complainant to the relevant editor or departmental head or reporter, or a complaint from a complainant via the Press Complaints Commission to the relevant editor. In addition, fairly minor complaints about accuracy are sometimes emailed to Editorial Information, the newspapers' Customer Services Department (which deals with a host of other matters as well) based in Chatham. Further, complaints relating to online comments on website articles are channelled to the Telegraph's website moderators who are also based in Chatham; these usually involve concerns that a user is allegedly guilty of posting abusive or (very rarely) defamatory material. Matters sent to Editorial Information or to the moderators at Chatham represent a very small minority of all complaints received. We do not entertain complaints over the telephone, and callers are asked to write to or email the relevant editor of the title concerned.
14. Once a complaint is received by one of our editors, departmental heads or reporters, it is required to be passed on to my department. Where complaints are sent directly to reporters the reporters are obliged to pass these on to my department to be dealt with in the normal way, though occasionally some reporters or departmental heads correct minor, non-contentious inaccuracies themselves. There are two Editorial Directives which address how to handle complaints<sup>3</sup>. The majority of complaints received concern alleged inaccuracy; the remainder are mostly allegations of defamation and, even more occasionally, complaints of breach of privacy.

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<sup>3</sup> See further paragraph 38 below.

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15. The procedure with all complaints is to open a file to record all relevant details including the articles (print, online or both) complained of. I, or a member of my team, then email the relevant reporter asking for swift and detailed responses to the matters raised in the complaint. After the response from the reporter is received (and occasionally beforehand), we decide whether or not the article should be suspended from our website (if it appeared there), pending fuller investigation or consideration of the matter. Following appropriate investigations and discussions with the relevant reporters, departmental heads and/or editors concerning whether any remedial action by way of clarification in print and/or online is required, a response to an individual complainant, the Press Complaints Commission or a solicitors' firm (as appropriate) is then drafted by my department. The final response is signed by a departmental head or a title editor. Unless there is a significant threat that legal proceedings will be commenced, the vast majority of complaints received by my department are handled without recourse to external firms of lawyers.

16. Similarly, my Department is responsible for advising with regard to any legal proceedings commenced against the newspaper which relate to editorial content, e.g. a claim for libel or breach of privacy. The decision whether to defend or settle a claim, and on what grounds, will ultimately be taken by the editorial management team of Richard Ellis (Executive Director, Editorial) and Mark Skipworth (Executive Editor), albeit following discussion with the relevant Editor. However, I will be heavily involved with advising and making recommendations to the senior editorial team, if necessary in conjunction with external Counsel, and at all stages the Finance Director is kept informed regarding the possible financial implications of any legal proceedings.

17. As Editorial Legal Director, I am responsible for ensuring that the senior editorial team are kept generally informed regarding the key issues being dealt with by my Department. My reporting line for these purposes is directly into the Editors, Tony Gallagher (the Daily Telegraph) and Ian MacGregor (the Sunday Telegraph). I also have monthly provisions

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meetings with the editorial management team of Richard Ellis and Mark Skipworth to discuss the progress of key cases, update them on new matters and to keep them informed regarding the editorial legal budget, which I am responsible for managing.

***Question 3: Whether you have ever been asked to advise upon the legality of methods of obtaining information including (but not limited to) phone hacking, computer hacking and "blagging"? If so, please give the best particulars that you can about who sought the advice, when, in what context and the advice that you gave (please see the penultimate paragraph of this notice in relation to legal privilege).***

18. I have never been asked while at TMG to advise on the legality of obtaining information via phone hacking or computer hacking.
19. The only occasions when I have advised on the legality of methods of obtaining information relates to leaked documents and their source.
20. On occasion, certain Telegraph journalists will receive leaked documents. If leaked documents are received, I would expect to get involved in advising on the legality of the particular circumstances surrounding the receipt of the leaked information, and helping to manage the process for dealing with the leaked documents. However, I also try to ensure that all journalists are advised and briefed *in advance* regarding the procedure to be followed in the event of receipt of leaked information. In particular, I have sought to put in place standard procedures to ensure that confidential sources and information are protected and that leaked information is not placed on the main TMG computer system, thereby maintaining the integrity of that system.
21. I have also occasionally been asked to advise on the possible use of subterfuge to obtain information, and on one occasion since my arrival at TMG to advise regarding the exclusive buy-up of photographs (although these occasions did not raise strict issues of legality). In such cases, the

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advice which I provided was by reference to, and sought to ensure compliance with, the PCC Code.

***Question 4: What training, guidance and policies have been provided to you by your employer in order to enable you accurately advise upon the legality of methods of obtaining information (including keeping up to date)? Do you consider that it has been adequate?***

22. Since joining TMG last year, I have attended a number of courses which address relevant aspects of law and practice. For example, in September 2010 I attended the 5RB Media & Entertainment Law Conference, and in March this year I attended a conference entitled "Coming Changes to the Defamation and Privacy Law Landscape". Both conferences focused on defamation and privacy law issues, which are the areas of law which principally concern my Department on a day-to-day basis, and hence which form the core of the training which I attend. I also attended the two day Media Law Resource Centre biannual conference on 19 and 20 September 2011.

23. As will be apparent from what I have stated above, advice regarding the legality of methods of obtaining information is something which I have been required to advise on infrequently. For example, by contrast to the couple of occasions that I have been asked to advise on the use of subterfuge, I have advised many thousands of times on copyright, privacy and defamation issues, as well as on issues such as accurate reporting. I have, nevertheless, always taken steps to ensure that I remain up to date with developments in relation to this area of the law. Similarly, I receive email updates from law firms, and the Company pays for me to subscribe to Media Lawyer, which provides updates and reports on all areas relevant to lawyers working in the media, including PCC reports providing comments and interpretation of the PCC Code etc..

24. I am encouraged by, and have the support of, TMG to attend whatever training I consider appropriate, and as such I have never had any



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concerns regarding the adequacy of the training and information available to me regarding recent developments in the law. Indeed, I undertake far more continuing professional development than the 12 hours per year required by the Bar Council.

***Question 5: Whether you have ever been asked to advise upon the legality of paying public servants (including police constables) for information either in cash or kind. If so, please give the best particulars that you can about who sought the advice, when, in what context and the advice that you gave (please see the penultimate paragraph of this notice in relation to legal privilege).***

25. To the best of my recollection, I have never been asked to advise on the legality of paying public servants for information either in cash or kind.

***Question 6: What training, guidance and policies have been provided to you by your employer in order to enable you accurately to advise on issues of bribery and corruption? Do you consider that it has been adequate?***

26. Since joining TMG, I have attended an internal course on the Bribery Act provided by Squire Sanders (then "Hammonds"), attended an external course by Irwin Mitchell and read a number of articles.

27. My Department is required to advise and be able to recognise when there might be a bribery and corruption issue and if the issue concerned an editorial matter, I would deal with it. Otherwise, if it was a broader issue relating to the Bribery Act, I would refer the matter to the Corporate Legal Department (in particular, Kate Teh) and, if necessary, to external legal advisers. I am satisfied that the training and guidance which I have been provided with is adequate to allow me to advise to this extent. In fact, I have addressed the Bribery Act, and outlined the matters which journalists are and are not allowed to do, in the training which I provide to the Telegraph's trainees and editorial staff (see, for example, A Reporter's Guide to Media Law, provided to Telegraph trainees in June 2011).

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28. To the best of my knowledge, no issues regarding bribery and corruption have arisen whilst I have been employed by TMG.

***Question 7: Have you had input into any internal inquiry into phone hacking, computer hacking, "blagging" or bribery or corruption? If so, please describe the same, setting out your role and the outcome?***

29. I have had no input into any internal inquiry into phone hacking, computer hacking, blagging, bribery or corruption.

***Questions 8 to 10: How you understand the system of corporate governance to work in practice at the [Daily Telegraph and Sunday Telegraph] with particular emphasis on systems to ensure lawful, professional and ethical conduct.***

***What your role is in ensuring that the system of corporate governance and all relevant policies are adhered to in practice. If you do not consider yourself to have any responsibility for this, please tell us who you consider to hold that responsibility.***

***Whether the documents and policies referred to above are adhered to in practice, to the best of your knowledge.***

30. TMG has a range of systems, practices and procedures in place which seek to ensure that its journalists and editorial teams operate and work in a lawful, professional and ethical way. This includes formal guidance issued to journalists (e.g. Editorial Directives, which I address below) and formal checks and controls on their activities (e.g. authority levels required for approval of contributions and expenses). However, at the end of the day journalists have to be allowed a certain amount of freedom to operate and investigate stories; it is an essential part of journalism. I believe that the culture and ethics promoted by the newsroom and the newspaper play an important role.

31. TMG are strong supporters and proponents of the PCC Code and of the *Reynolds* principles of responsible journalism. In relation to the former, it is an express term of both editorial staff contracts of employment and

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editorial retainer contracts that the journalists will comply with the PCC Code<sup>4</sup>.

32. As far as I am aware, virtually all Telegraph journalists will, before joining the newspaper, have been to an NCTJ accredited course, which will have provided them with a detailed understanding of the PCC Code and *Reynolds* principles, and with the key areas of law (e.g. libel, privacy etc.). When they join the Telegraph, the newspaper seeks to reinforce this knowledge. For example, each year the Telegraph operates an Editorial Graduate scheme, where recruits spend seven weeks with the Press Association at their training Centre in Howden, followed by a few months at a regional newspaper publisher and then a further period of training after they arrive in the Telegraph's offices. During this training period the PCC Code and the *Reynolds* principles, as well as the legal framework within which the media operate, will be key elements of their education. I personally give some of the training, both at Howden and during the training period at the Telegraph, and in both seminars I seek to explore and illustrate the practical application and limitations imposed by the PCC Code and the law.

33. As Editorial Legal Director, I have been asked by HR (in conjunction with Richard Ellis), to provide a refresher course and update talks to certain desks and groups. For example, in June of this year I provided an update to the City desk: A Reporter's Guide to Media Law. In common with the approach I try to take for most internal training, I reminded the City desk of the PCC Code's principles, and spoke to them about recent developments in the law which were of particular relevance to their area of journalism.

34. In addition to the formal training seminars, the informal training and guidance which the Editorial Legal Department's lawyers provide to journalists every day is, I think, critical to informing the professional and ethical conduct of the newsroom. As I have addressed above, the

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<sup>4</sup> "You will comply with the Editors' Code of Conduct issued by the Press Complaints Commission from time to time, in particular those clauses relating to privacy, harassment, children and hospitals".

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Department's lawyers review and, if necessary, amend draft content and images to ensure that they are not libellous, in breach of copyright or otherwise cause legal issues. However, as equally important is the provision of 24 hour a day access to legal advice and the editorial lawyers' presence on the editorial floor which, in combination, ensures that lawyers can be, and frequently are, consulted at a very early stage of the pre-publication process, as well as at subsequent stages when required.

35. My department also operates a system of legal warnings. Warnings are sent out to all appropriate senior editorial staff and reporters as and when necessary to cover the following circumstances:

- a) occasions when a restriction has been placed on a particular story or the identity of an individual, for example because of an injunction or a request from the police not to disclose certain information relating to an ongoing inquiry;
- b) in the wake of a specific complaint, where there is a need to ensure that certain information is not inadvertently repeated;
- c) to alert editorial to particular categories of complaint, e.g. if a number of readers were offended by a story or the use of a particular image, or if my Department feels that editorial needs to be made aware of a persistent complainant; and
- d) to alert editorial to any PCC Guidance which has been issued.

36. In addition to the above, an appropriate warning is attached to our computerised library archive on occasion. This type of warning is of two types: a legal warning, which is attached to a specific article, and a floating legal warning, which attaches to an individual or a subject-type such as a company or institution.

37. The operation of the correct procedures for dealing with complaints, including ensuring that complaints are handled fairly, reasonably and,

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where necessary, consideration is given to whether articles should be removed from online and, if so, that they are removed quickly, is also an important part of the systems and procedures in place to ensure ethical and professional conduct.

38. Finally, Editorial Directives provide a mechanism to remind journalists, or appropriate categories of editorial staff, of particularly important policies and procedures which must be followed. For example, I requested that an Editorial Directive be issued to all editorial staff on 27 July 2011 concerning the treatment of complaints. This immediately followed the libel judgement against Lynn Barber's (a freelance journalist) 2008 review of Sarah Thornton's book, *Seven Days in the Art World*, and reminded staff that "*If you receive any complaint about your work for Telegraph Media Group, please ensure it is immediately forwarded or brought to the attention of your section editor and Adam Canon's legal team at [legal@telegraph.co.uk](mailto:legal@telegraph.co.uk).*" – updating a similar Directive which had been issued on 24 May 2007.
39. The above provides an overview of some of the key systems for ensuring the legal, professional and ethical conduct of journalists which I, as Editorial Legal Director, am involved with. There are other systems in place, such as the strict authority levels for approval of contributions and expenses.
40. The legal function is advisory only and hence, although I have involvement in the above systems, it is not my responsibility to ensure compliance. That responsibility sits with Richard Ellis (Executive Director, Editorial), and as such I would always escalate any serious issue to Richard Ellis, as well as through my reporting line to the relevant Editor.

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***Question 11: Whether these practices have changed, either recently as a result of the phone hacking media interest or prior to that point, and if so, what the reasons for the change were.***

41. There has been no change to practices at TMG as a result of phone hacking media interest or otherwise.

42. TMG has, in September 2011, issued an Editorial Code of Conduct bringing together some of the key policies and protocols, the vast majority of which are already in our Staff Handbook, into one short and accessible document as a useful aide memoir to all staff. This was distributed under cover of a letter from Murdoch MacLennan (Chief Executive).

***Question 12: Where [does] the responsibility for checking sources of information (including the method by which the information was obtained) lie: from reporter to news editor/showbiz editor/royal editor to editor, and how this is done in practice (with some representative examples to add clarity).***

43. In the case of the vast majority of stories published in the Telegraph, the source of information and the method by which it was obtained is self-evident on the face of the story e.g. on the record quotes, speeches, press conferences etc.

44. It is, in the first instance, the responsibility of the journalists to check their sources of information. The journalists on both our titles are extremely experienced in their particular areas of expertise. However, in circumstances where the source of information is not clear, responsibility for checking the source sits at each level of a journalist's reporting line. Ultimately the Editor has responsibility for checking the source and being satisfied about the method by which it was obtained. How this is done in practice is something which I believe the Editors are better placed to address than I am.

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**Question 13: To what extent [is] an editor [...] aware, and should be aware, of the sources of the information which make up the central stories featured in the above newspapers each day (including the method by which the information was obtained).**

45. I believe that this question is being addressed by the Editors in their statements (i.e. Tony Gallagher of the Daily Telegraph, and Ian MacGregor of the Sunday Telegraph).

**Question 14: The extent to which you consider that ethics can and should play a role in the print media, and what you consider 'ethics' to mean in this context.**

46. Ethics to me means that the newspaper abides by its obligations under the PCC Code and the law. If we publish something which is inaccurate, libellous or private, we have an obligation to put the matter right as speedily and efficiently as possible. However, we also have to ensure that this is balanced against the need to expose wrongdoing and hypocrisy and exercise our pursuit of the public interest responsibly.

**Question 15: The extent to which you, as a legal adviser, felt any financial and/or commercial pressure from the proprietors of the [Daily Telegraph and Sunday Telegraph] or anyone else, and whether any such pressure affected any of the decisions you made as a legal adviser (such evidence to be limited to matters covered by the Terms of Reference).**

47. I have never felt any financial or commercial pressure from TMG's proprietors, or anyone else.

**Question 16: The extent (if any) to which you, as a legal adviser, had a financial incentive in the above newspapers printing exclusive stories (NB. It is not necessary to state your precise earnings).**

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48. I am eligible to participate in an annual bonus scheme. At the start of each financial year my key performance criteria are set, the ultimate achievement of which will determine the value of that bonus. However, the bonus is a relatively small proportion of my basic salary.

49. I have no financial incentive in the newspapers printing exclusive stories, save to the extent it might be thought that exclusive stories increase the newspaper's circulation, and hence potentially improve the overall financial performance of the Company. In practice, I do not consider that I have any financial incentive in the Daily Telegraph or the Sunday Telegraph running exclusive stories, and my own financial position is certainly not a factor which I have in mind when I am advising in respect of a potentially exclusive story.

***Questions 17 to 20: Whether, to the best of your knowledge, the [Daily Telegraph or Sunday Telegraph] used, paid or had any connection with private investigators in order to source stories or information and/or paid or received payments in kind for such information from the police, public officials, mobile phone companies or others with access to the same... (NB. You are not required to identify individuals, either within the above newspapers or otherwise).***

***What your role was in instructing, paying, advising on, or having any other contact with such private investigators and/or other external providers of information including advising on any of these activities. If such investigators or other external providers of information were used, what policy/protocol, if any, was used to facilitate the use of such investigators or other external providers of information?***

***If there was such a policy/protocol, whether it was followed, and if not, what practice was followed in respect of these matters.***

***Whether there are situations in which neither the existing protocol/policy nor the practice were followed and what precisely happened/failed to happen in those situations. What factors were in play in deciding to depart from the protocol or practice?***



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50. I am aware of one occasion when a journalist at the Daily Telegraph used a company called Commercial & Legal Services Limited to legally obtain an address of a witness. However, I only became aware of this after the event, when the source of the witness' address became of incidental relevance to a court hearing.

51. I am not aware of any other occasion in which the Daily Telegraph or the Sunday Telegraph have used private investigators to source a story or information. Nor am I aware of any policy or protocol which relates to the use of private investigators.

52. I am not aware of the Daily Telegraph or the Sunday Telegraph ever having made direct payments to police, public officials, mobile phone companies or intermediaries with access to the same for information. I understand that police and public officials might, from time to time, be entertained by members of the editorial staff (e.g. crime or political correspondents), and I am aware of the Expenses & Business Travel Policy and Procurement Policy. However, I have never been asked to advise in respect of any direct payment or payment in kind to these categories.

***Question 21: The extent to which you are aware of protocols or policies operating at the [Daily Telegraph or Sunday Telegraph] in relation to expenses or remuneration paid to other external sources of information (whether actually commissioned by the above newspapers or not).***

***There is no need for you to cover 'official' sources, such as the Press Association.***

53. I have already referred above to the Expenses & Business Travel Policy and Procurement Policy contained in the Staff Handbook

54. If there was any significant expenditure proposed in a "buy up" agreement I would expect it to be signed-off by a person with the appropriate authority. Certainly, if any such proposed expenditure came to my

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attention I would always check and ensure that the relevant person had been informed of the proposed payment.

55. I have referred above to the fact that on one occasion I advised with regard to the exclusive buy-up of photographs. I am not aware of any formal protocols or policies relating to such buy-ups – which are very rare at the Telegraph – save that they should be in accordance with the Procurement policy, the law and the spirit of the PCC Code.

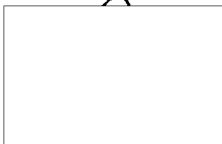
56. Book serialisations and interviews with authors connected to such serialisations are slightly more common, and Editorial Directives are issued from time-to-time regarding the procedure to be followed<sup>5</sup>.

57. Otherwise, I am not aware of any additional policies or procedures regarding expenses or payments made to external sources of information.

***Question 22: Whether you, or the above newspapers (to the best of your knowledge) ever used or commissioned anyone who used 'computer hacking' in order to source stories, or for any other reason.***

58. I have never commissioned anyone to use 'computer hacking' (or, for completeness, 'phone hacking') in order to source stories or for any other reason, and to the best of my knowledge I am not aware of the Daily Telegraph or the Sunday Telegraph having done so.

I believe the facts stated in this witness statement are true



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<sup>5</sup> See the Editorial Directive issued on 18 October 2010.