

IN THE MATTER OF THE LEVESON INQUIRY,
AN INQUIRY UNDER THE INQUIRIES ACT 2005

WITNESS STATEMENT OF
PIERS MORGAN

I, **PIERS MORGAN**, of 1 Time Warner Center, New York, NY 10019 will say as follows:

1. I am a journalist, author and television presenter. I was formerly the Editor of each of the *News of the World* and the *Daily Mirror*.
2. Except where stated otherwise, the matters contained in this statement are within my own knowledge and belief, and are described to the best of my recollection.
3. There is now shown to me a bundle of documents marked "Exhibit PM1", to which I will refer throughout this statement. References to page numbers in this statement are, unless the context requires otherwise, references to the page numbers of Exhibit PM1.
4. I have been required to provide this statement pursuant to a Notice under section 21(2) of the Inquiries Act 2005 contained in a letter issued to me by the Leveson Inquiry (the *Inquiry*) on 28 September 2011 (the *Inquiry's Letter*), a copy of which is set out at pages 1 to 4 of Exhibit PM1. However, I provide this statement willingly, and will continue to provide the Inquiry with any and all assistance it may require in the discharge of its Terms of Reference.
5. My full name is Piers Stefan Pughe-Morgan. I am professionally known as Piers Morgan.

MY PROFESSIONAL BACKGROUND – question 1 of the Inquiry's Letter

6. I began my career in journalism in 1985 as a reporter with the Surrey and South London Newspaper Group, working on that company's *Wimbledon News*, *South London News* and *Streatham and Tooting News* titles.
7. In 1989, I left South London Newspaper Group and took up a position with *The Sun*, working under its then Editor, Kelvin MacKenzie. During that period, I worked as the *de facto* editor of that paper's showbiz column, titled "Bizarre". The Sun was then and

is still published by the News Group Newspapers division of News International, which is a wholly-owned subsidiary of News Corporation.

8. In January 1994, I was appointed Editor of the *News of the World*, another newspaper published by News International.
9. In 1995, I received an offer from the Mirror Group to be the Editor of the *Daily Mirror*. I was attracted by the challenge of editing a daily, rather than weekly, newspaper. I left the *News of the World* in August of that year and took up the position of Editor of the *Daily Mirror* starting, after a couple of months' gardening leave, in September 1995.
10. I worked as Editor of the *Daily Mirror* until 14 May 2004. The reasons for my departure from the *Daily Mirror* were well publicised at the time, and I do not understand them to be relevant to this Inquiry.
11. Since leaving the *Daily Mirror*, I have been involved in a number of other publishing ventures, but I have devoted more of my time during that period to work in television presentation and proprietorship. I have worked on a number of leading television shows produced by, among others, the BBC, ITV, Channel 4, NBC and CNN. My main current professional commitment is as presenter of *Piers Morgan Tonight*, a television show produced and broadcast by U.S. news broadcaster, CNN, which replaced the iconic evening current affairs show, *Larry King Live*, following its host's retirement in 2010.
12. I continue to work in print journalism, having recently written articles for publications such as the *Daily Mail*, the *Mail On Sunday's LIVE Magazine* and *GQ*, and having authored a number of books.

INTRODUCTORY REMARKS

13. It is now over seven years since I was Editor of the *Daily Mirror*, and over sixteen years since I was Editor of the *News of the World*. My recollection of the details of sourcing or fact-checking particular stories has, inevitably, faded over time, and is now very patchy. In particular, my recollection of routine, day-to-day activities during my time as Editor of the *News of the World* is limited, and as a former employee of that paper, I do not have access to documents from my time there. Nonetheless, in the short time period afforded to me to prepare this witness statement, I have sought to be of as much assistance to the Inquiry as I can.

14. In this witness statement, as required by the Notice in the Inquiry's Letter, I will:
- (i) Comment on my experience of and views on the role of ethics in the Press;
 - (ii) Explain the factors I took into account in relation to the publication of stories requiring a balancing of private interests and the public interests;
 - (iii) Describe the systems and controls in place at the *News of the World* and the *Daily Mirror* during my tenure as Editor at those publications to ensure the observance of ethical standards and regarding the checking of sources of information;
 - (iv) Describe the pressures and incentives applicable to me in my roles as Editor of the *News of the World* and the *Daily Mirror*;
 - (v) Comment on my experience of the use of private investigators during my tenure as Editor of the *News of the World* and the *Daily Mirror*;
 - (vi) Comment on my experience of the use of and payment of expenses or remuneration to external providers of information during my tenure as Editor of the *News of the World* and the *Daily Mirror*; and
 - (vii) Confirm my lack of any experience of the use of computer hacking during my tenure as Editor of the *News of the World* and the *Daily Mirror*.

MY EXPERIENCE OF AND VIEWS ON THE ROLE OF ETHICS IN THE PRESS

The role of ethics in the Press generally – question 8 of the Inquiry's Letter

15. Ethical determinations are central to the role of an Editor of a major national newspaper, and to the profession of journalism generally. During my time as Editor of the *News of the World* and the *Daily Mirror*, ethical considerations were interwoven into my work, and were an omnipresent aspect of daily professional life.
16. Thankfully, editorial decisions are not made in an ethical vacuum. As well as the requirements of the law, editors are provided with extensive guidance on the ethical behaviour expected of them and of members of the Press in general in the form of the *Editors' Code of Practice*, first published in January 1991, and the Press Complaints Commission's own interpretations of the *Code of Practice*.
17. The *Code of Practice* was the key document outlining the ethical obligations on the Press during my time at the *News of the World* and the *Daily Mirror*. It was displayed

prominently in the news room of the *Daily Mirror* throughout my tenure as Editor there, and informed every editorial decision I made during my tenure as Editor of the *News of the World* and the *Daily Mirror*, in particular in so far as those decisions involved a balancing of the right to privacy of individuals and the public interest in Press freedom.

18. My recollection is that compliance with the *Code of Practice* was a requirement of the contracts of employment of journalists working with the *Daily Mirror* from at least around 2000. While I do not believe such a requirement of compliance with the *Code of Practice* was ever formally included in my contract of employment as Editor, a copy of which, redacted to exclude irrelevant details of my remuneration, is set out at pages 5 to 17 of Exhibit PM1, I certainly always considered myself obliged to comply with it.
19. I understand the *Code of Practice* to have been amended on a number of occasions during my tenure as Editor at those papers. I also understand the *Code of Practice* to have been amended since I left the *Daily Mirror*, as is to be expected of an ethical code which by its very nature needs to keep pace with evolving social mores, technology and applicable laws. I note in particular that the *Code of Practice* was significantly amended in June 2004, the month after I left the *Daily Mirror*, including amendments to the provisions dealing with privacy, subterfuge and "clandestine devices". It has also been brought to my attention that those provisions were subsequently re-modelled in 2007 and 2009. Also in June 2004, there were changes to the provisions on the public interest justification required for payment to sources, and further changes to the provisions on the public interest were made in 2009. For obvious reasons, I have no professional experience of how those provisions affect today or affected during the period since June 2004 the daily work of a newspaper editor.
20. The *Code of Practice* has an ethical, rather than a strict legal, focus. In the interests of a free Press, this is necessarily the case. In some cases, this ethical emphasis results in outcomes different from those required by law. For instance whereas under the criminal law the restriction on payments to a criminal for a story were subject to specific exceptions and limitation periods, the *Code of Practice* contained a more blanket ban, albeit subject to the general exception relating to the public interest.
21. This was borne out by the Press Complaints Commission adjudication in 2003 regarding the *Daily Mirror* paying Tony Martin for an interview after his release from jail. I have not exhibited the adjudication as copies of such adjudications are available

online. In that case, the *Daily Mirror* was able to convince the Press Complaints Commission that the broader public policy debate that had been sparked by Mr Martin's prosecution justified a payment to him to secure his story and his input to this national debate.

22. The breadth of the public interest exception is, in my opinion, essential for the protection of the freedom of the Press, and the freedom of expression generally. Despite this when the public interest exception is relied upon before the Press Complaints Commission the burden of proof is on an editor "*to demonstrate fully that they reasonably believed that publication, or journalistic activity undertaken with a view to publication, would be in the public interest*".
23. As Editor of the *News of the World*, there were a small number of instances in which the Press Complaints Commission found me to have failed to strike this balance correctly (see paragraph 34 below). However, during my time as Editor of the *Daily Mirror*, I was able to demonstrate in every instance where I relied upon the public interest exception before the Press Complaints Commission that publication was in fact in the public interest. Copies of all such adjudications are available online. I should note that in none of those cases were *Daily Mirror* journalists, or anyone else, accused of criminal behaviour.

The factors I took into account in relation to the publication of stories requiring a balancing of private interests and the public interest – question 18 of the Inquiry's Letter

24. There were always two key considerations in assessing whether to publish a story involving a balancing between the interests of the subject of the story in maintaining privacy: legal considerations and ethical considerations.
25. In my experience, in practice, the enormously onerous requirements of libel laws in the UK led newspapers to consider legal considerations first, before moving on to consider the ethical implications: if the story was likely to result in a libel action (and was therefore unlikely to be published), there was little point expending resources and senior editorial time in evaluating the ethical considerations.
26. During my tenure as Editor of the *Daily Mirror*, once I had satisfied myself, in collaboration with the paper's legal department, that the story could be published without fear of defamation actions, I would move on to consider the question whether

publication of the story risked giving rise to a violation of the *Code of Practice*, including whether there was public interest justification for running the story.

27. The *Code of Practice* includes among the potential public interest justifications for publishing stories which might otherwise involve unwarranted incursions into personal privacy matters such as "*detecting or exposing crime or serious impropriety*", "*protecting public health and safety*" and "*preventing the public from being misled by an action or statement of an individual or organisation*". In my editorial decision-making, I would also take into account other ethical questions such as whether the story was gratuitous, whether the negative impact on the private lives of those involved was unwarranted or disproportionate to the public interest in publication, and whether there was a real risk to the well-being or health of any individual.
28. Although the *Code of Practice* informed all my editorial decision-making on whether to publish stories in such circumstances, I would point to a number of specific examples of cases in which I decided not to publish a story, or where the content of a story was changed to ensure compliance with the *Code of Practice*.
29. In November 1996, a freelance journalist provided a leaked copy of the Budget that was due to be announced the next day by then Chancellor Ken Clarke. There was a strong temptation to publish, and I was later criticised in some quarters for not doing so, but for several reasons it was decided that we should not publish. This was partly because we could not confirm the documents were genuine in the short time available, and partly because I thought it would be irresponsible and could result in financial turmoil and uncertainty, potentially leading to significant impacts on the lives of private citizens. Instead I arranged for a member of staff of the *Daily Mirror* to be photographed handing back the leaked document.
30. One example of the balance between the private interest in privacy of an individual and the public interest in publication leading to a story not being run occurred during the early part of my tenure as Editor of the *News of the World*. Our newsdesk had uncovered a story about a switchboard operator who had become obsessed with a caller, tracked him down and begun to stalk him. Just before publication, a reporter who was tasked with confronting this individual brought it to my attention that she had explained that she had recently undergone psychiatric treatment after an attempted suicide, which she would repeat if we published. Our investigations demonstrated the truth of her story, and we decided not to run it. This was not because of the mere fact

that she threatened to kill herself – many people do so when confronted with publication of their wrongdoing. However, in this case, unlike in the case of, for example, a paedophile or other serious offender, the public interest in publication was outweighed by the resulting risk to the woman in question.

31. There were a number of other examples of this balancing of public and private interests leading to the modification or withholding of stories during my time at the *Daily Mirror*. In December 1997, we had a story about the 17 year-old son of the then Home Secretary being involved in selling cannabis, a highly newsworthy story with no small measure of public interest value. We confirmed the story, but because of the *Code of Practice*'s rules about minors we decided not to print the story at all, and told the boy's father instead. A few days later, after discovering that the Home Secretary had taken his son to a police station, and knowing that the story would break imminently, I felt compelled to run the story. However, in order to comply with the *Code of Practice*, we ran the story without identifying the boy.
32. Even in the case of minors, the public interest sometimes favours publication. In March 1997, the *Daily Mirror* ran an article on the suspension from school of the 15-year-old son of a Tory MP following an incident in which the boy had discharged a plastic firearm on a school bus. The resulting complaint to the PCC from the boy's father was not upheld, partly due to the MP's stance on firearms legislation, and partly on apparent public interest grounds resulting from the dangerous nature of the incident.
33. In January 2001, when we published a story about Naomi Campbell attending Narcotics Anonymous we included a photo of her leaving a meeting but ensured that the faces of the other attendees were blanked. While we considered there was a public interest justification for publishing the story about Naomi Campbell, Ms Campbell having previously denied having a drug problem, there was no such justification for the other attendees and we acted to maintain their privacy.
34. Despite my best efforts there were, unfortunately, times when breaches of the *Code of Practice* have occurred. The seriousness with which the *Code of Practice* was treated by myself and colleagues at the *Daily Mirror* ensured that these were rare. One such example was a hurried front-page article in the *News of the World* in early April 1995 (assembled following the decision to move a picture of the deceased Ronnie Kray to inside pages, which I discuss at paragraph 45 below) about Earl Spencer's wife receiving treatment in an addiction clinic. Earl Spencer's subsequent complaint to the

PCC was upheld, with the paper subjecting me personally to unprecedented criticism, deploying for the first time their ultimate sanction of a referral to the newspaper's proprietor. Mr Murdoch's subsequent public statement was also highly critical of me personally:

"[I]t is clear in this case that the young man went over the top. ... I have no hesitation in making public this remonstrance and I have reminded Mr Morgan forcefully of his responsibility to the Code to which he, as an editor, subscribes to in his contract of employment. The company will not tolerate its papers bringing into disrepute the best practices of popular journalism."

It was a chastening experience and a lesson learned, and I regret the error of judgement.

The systems and controls in place at the *News of the World* and the *Daily Mirror* during my tenure as Editor at those publications to ensure the observance of ethical standards – questions 2 to 5 of the Inquiry's Letter

35. I have no recollection of any specific internal documents or policies beyond the *Code of Practice* relating to the maintenance of ethical standards at the *News of the World*.
36. At the *Daily Mirror*, my understanding is that the ethical standards expected of journalists were spelled out in their employment contracts, which stipulated that a journalist must operate within the law, and the *Code of Practice*. As such, responsibility for ensuring the observance of ethical standards was an obligation borne by all members of the *Daily Mirror* journalistic staff. Individual journalists had responsibility for ensuring that their own work (in particular their investigative activities) met the requirements of the *Code of Practice*, and their desk editors were responsible for overseeing their observance of ethical standards in this regard.
37. By the time a story was brought to me for consideration for publication, considerations of the ethical compliance of the investigative activities taken forward in the development of the story or the source from which the story derived had largely already been taken into account by the journalist whose story it was, and his editor. As such, the key ethical determinations in which I was involved were those relating to whether or not to publish, rather than how a specific investigation should be conducted.
38. This worked well in practice. Indeed, as a young Editor who had not previously worked on or edited a news desk at a major newspaper, determinations as to whether we ran a story or not were more comfortably within my experience than determinations as to the journalistic and investigative method to be deployed in the development of stories. I was content to rely on the judgement of my experienced desk editors.

The systems and controls in place at the *News of the World* and the *Daily Mirror* during my tenure as editor at those publications regarding the checking of sources of information – questions 6 to 7 of the Inquiry's Letter

39. Again, I have no particular recollection of any specific internal documents or policies beyond the *Code of Practice* relating to the maintenance of ethical standards at the *News of the World*.
40. As Editor of the *Daily Mirror*, as explained above, stories were only brought to me for determination as to whether or not to publish once the journalists on the story had sourced and verified the story, and had it approved by the responsible desk editor. It was very rare for a story that was not print-ready to be brought to me. My journalists, and their desk editors, knew that if they brought me a story which had not been corroborated or adequately verified it would be unlikely to see print. The requirements of libel laws in the UK demand great attention from journalists to verification of their stories.
41. The first person a journalist took their story to would be their immediate editor – Sports, Crime, Business, News, Showbiz, etc. It was that editor's responsibility to seek confirmation from the journalists on the story that they had adequate factual evidence and, where necessary, corroboration for the story. If there was a question mark as to the factual underpinning to a story, it might in some circumstances be considered by the paper's legal department. This was essential to protect the paper from the enormous cost of defending libel suits. Only after that would a story be brought to me.
42. It was not generally a requirement of my work as Editor to know the source of the journalist's information. Indeed, often, conscious efforts were made to limit the number of journalists who knew the identity of the source, with a view to protecting the source's anonymity. Clearly, there were some circumstances in which it was key to my exercise of editorial discretion to know the identities of sources of information on which stories were based, although such circumstances were very rare. My assessments of the appropriateness of running stories based on third party sources of information depended on a wider range of factors, including the experience and reputation for reliability of the journalist in question.
43. Furthermore, many stories and columns did not need to be brought to me for a decision on whether or not to publish. Every day there would be substantial content included in the *Daily Mirror* that had not needed to be run past me.

PRESSURES AND INCENTIVES ON ME IN MY ROLES AS EDITOR OF THE *NEWS OF THE WORLD* AND THE *DAILY MIRROR* – questions 9 and 10 of the Inquiry's Letter

44. During my tenure as Editor of the *News of the World*, I was never put under financial or commercial pressure regarding my editorial decision-making. I considered myself to have complete editorial discretion, subject to the requirements of the law and the *Code of Practice*.
45. I would occasionally speak to Mr Murdoch, and as part of these discussions I might tell him what was going to be in that week's paper. He never once requested or required that I pull a story, or indeed that I run a story. His only interventions were in connection with how, rather than whether, to present a story. For example, in late March 1995, I was planning to run on the front page of the *News of the World*, with family permission, a picture of the recently-deceased Ronnie Kray lying in his open coffin. Mr Murdoch suggested that the picture not be run on the front page as his experience was that front-page images of dead bodies did not sell papers.
46. There was no bonus element to my remuneration as Editor of the *News of the World* linked to the publication of exclusive stories. My bonus at the *News of the World* was assessed as a matter of overall performance.
47. Part of the reasoning underlying bringing me to the *Daily Mirror* was to try to improve the paper's circulation. My remuneration at the *Daily Mirror* contained a bonus element which varied over time, but which depended primarily on operational metrics such as the paper's circulation and/or profitability generally and reductions in departmental costs. I must emphasise that my bonus arrangements at the *Daily Mirror* were not tied to the publication of exclusives or the breaking of stories as a result of *Daily Mirror* investigations. Furthermore, while editor of the *Daily Mirror*, I never made an editorial decision, nor was encouraged or required to take into account in my editorial decision-making, commercial considerations such as the risk of liability versus the potential circulation increase associated with the publication of a particular story.
48. Moreover, I have no recollection of any occasion during my tenure as Editor of the *Daily Mirror*, in which I was pressured by anyone in management, by the Chief Executive or by any interests within the ownership of the paper with regard to my editorial decision-making. A good example of the editorial freedom I enjoyed as Editor of the *Daily Mirror* was the complete lack of interference I encountered in maintaining the *Mirror's* sustained, principled and vociferous opposition to Britain's involvement in

the War in Iraq. Notwithstanding the substantial losses in circulation that stance was causing, I was never ordered to modify the paper's position.

49. Obviously, everyone wanted the paper to do well and to attract more readers, and this had a bearing on my editorial decisions as to content and style, but not such as to compromise my observance of the requirements of the law and the *Code of Practice*.

MY EXPERIENCE OF THE USE OF PRIVATE INVESTIGATORS DURING MY TENURE AS EDITOR OF THE *NEWS OF THE WORLD* AND THE *DAILY MIRROR* – questions 11 to 15 of the Inquiry's Letter

50. I have no recollection of any personal involvement on my part in the use of private investigators during my time at the *News of the World*, whether in the commissioning of work by, the selection of, the authorisation of payment to or discussions on investigative methods with, such private investigators.
51. The *Daily Mirror* would from time to time engage private investigators during my time as Editor. Such professionals were useful tools for journalists in securing corroborating evidence for, or fact-checking, articles and stories that journalists had uncovered or about which they had received a tip. Private investigators would sometimes be engaged to gather and provide additional evidence required by the paper to satisfy itself that it was justified in running a story.
52. The pressure on journalists to secure corroborative evidence in support of stories provided by third party sources increased during my time as Editor at the *Daily Mirror*. This increase in pressure resulted partly from the potentially catastrophic consequences of adverse damages awards for libel at a time when exemplary damages awards were being made to celebrity claimants. The need to secure evidence suitable for use in court in defence of the paper's publication of stories led some journalists to place reliance on private investigators. A perception of growing risk to the anonymity of journalistic sources from legal developments, such as the judgment of the House of Lords in the *Ashworth Security Hospital* case in 2002, also increased the interest journalists had in obtaining independent corroboration for their stories. Furthermore, in a climate in which newspapers' freedom of expression was increasingly being restricted in favour of the rights to privacy of the subjects of stories, particularly following the introduction of the Human Rights Act 1998, it became increasingly important to have stories thoroughly fact-checked with a view to justifying publication.

53. I have no specific recollection of any stories which depended to a significant extent on the work of private investigators, and cannot now recall a specific example of where a story was first sourced from a private investigator.
54. I personally had very little input or role in the instructing of private investigators, and very little, if any, contact with them in circumstances where they were being used at the *Daily Mirror*. I do not even recall ever being asked to provide authorisation for the payment of an invoice, but I cannot rule out that this may have occurred during my time as Editor. Certainly, I have no recollection of the amounts paid to private investigators during my time at the *Daily Mirror*. Part of the reason for this was that, in so far as I can recollect, invoices over a very low value threshold (although I cannot remember the precise level) had to be signed off by the Managing Editor, rather than by myself.
55. I am not aware of any private investigators instructed by the Daily Mirror during my time as Editor having been found to have engaged in any criminal activity on behalf of the Daily Mirror, or of any Daily Mirror employee having any involvement in such law-breaking.

MY EXPERIENCE OF THE USE OF AND PAYMENT OF EXPENSES OR REMUNERATION TO EXTERNAL PROVIDERS OF INFORMATION DURING MY TENURE AS EDITOR OF THE *NEWS OF THE WORLD* AND THE *DAILY MIRROR*

The Use of Police Officers as Sources of Information

56. I have no knowledge or recollection of payments (or payments in kind) being made to serving police officers from my time at either the *News of the World* or the *Daily Mirror*, whether in return for stories, access to information, access to information sources or corroboration of existing stories.
57. In fact, there would often be exchanges of information between the Press and the Police, and my understanding was that the Police often found this dialogue to be useful in furthering their investigative activities.

The Use of Public Officials as Sources of Information

58. I have no knowledge or recollection of any payments or payments in kind made to public officials from my time at either the *News of the World* or the *Daily Mirror*, whether in return for stories, access to public information, access to information sources or corroboration of existing stories.

The Use of Mobile Phone Companies as Sources of Information

59. I have no knowledge or recollection of any payments or payments in kind made to telephone companies or their employees during my time at either the *News of the World* or the *Daily Mirror*. Moreover, while due to the lapse of time I cannot speak with complete certainty in this regard, I do not recall telephone companies or their employees ever being used as the sources of information for stories, or for corroboration, during my tenure as Editor at either newspaper.

The use of other third party sources of information

60. On any given day during my tenure as Editor, the *Daily Mirror* might receive dozens of tips for stories. The vast majority of these were discarded or ignored.

61. Many of the stories would come from news agencies, PR agents, such as Max Clifford, freelance journalists, or people with their own story to sell. If such a story had to be paid for, then we might pay between £1,000 and £3,000 for a front page exclusive story. Very occasionally, we paid much more than this. For an exclusive story that would run on the inside pages we might pay up to £500.

62. Needless to say, where stories were sourced from PR agents, they were typically being provided to us with the knowledge and approval of the source, and related to matters in which that source was a protagonist. In such circumstances, in my view, the public interest in publication is tilted decisively in favour of publication, notwithstanding the third party interests which might be affected.

63. In some circumstances, we may also have made payments to people who had come by information about third parties by apparently lawful, albeit arguably unseemly means, such as by sifting through discarded documents and other materials.

Policies and Protocols relating to the Use of Information from External Sources – questions 13 to 15 of the Inquiry's Letter

64. I do not recall there existing any specific policies and/or protocols relating to the use of information from external sources during my time as Editor of either the *News of the World* or the *Daily Mirror*. Such issues were matters for individual journalists to determine in the first instance, by reference to their own legal and/or ethical obligations, under the oversight of their responsible desk editor.

65. I do not recall any specific incidents in which the decision as to whether to use an external source of information, the selection of such an external source, the scope of instruction of such a source or the methods such a source was permitted to use in carrying out his or her instructions was escalated to me as Editor. While such matters were generally seen as falling within the purview and discretion of the desk editors, I might suggest to a journalist that he check a point with a particular third party (typically a publicist, such as Max Clifford) where I thought that third party might have an interest in or some input to provide on a story.

Policies and Protocols relating to the Payment of External Sources of Information – questions 16 to 17 of the Inquiry's Letter

66. As I have stated previously, it is now over seven years since I left the *Daily Mirror*. I believe that, at some point, most likely during the first half of my time at the *Daily Mirror*, a memo was circulated to staff stating that while journalists could make cash payments to sources of stories, such payments needed to be approved by the managing editor if they were over a very low money value threshold. I do not recall when this policy was implemented, or what the policy was before that. I do not have a copy of the memo, but I believe that it indicated that the identity of the source should not generally be revealed either to me or within the newspaper more broadly.
67. Part of the reason why payments to third party sources tended to be made in cash was to avoid the creation of a document trail which might identify the source more widely than was necessary among the staff of the newspaper, thereby increasing the risks to his or her anonymity. This was consistent with the stipulation in the *Code of Practice* that “journalists have a moral obligation to protect confidential sources of information”.
68. Needless to say, the accuracy of any source still had to be confirmed, and the story verified. So even though I may have been asked to provide authorisation for a cash payment to a source, control over the identity of the source generally remained with the journalist in question, or where necessary, his editor.
69. I have no recollection of the equivalent policy in place at the *News of the World* during my time there.

MY LACK OF ANY EXPERIENCE WHATSOEVER OF THE USE OF "COMPUTER HACKING" DURING MY TENURE AS EDITOR OF THE *NEWS OF THE WORLD* AND THE *DAILY MIRROR* -- question 19 of the Inquiry's Letter

70. While Editor of the *News of the World* and the *Daily Mirror* I did not commission anyone to conduct "computer hacking" in order to source stories, to obtain information, to corroborate existing stories, or for any other purpose. Nor did I have any knowledge whatsoever of "computer hacking" for any purpose whatsoever.

DOCUMENTS RESPONSIVE TO THE REQUESTS IN THE INQUIRY'S LETTER

71. I am not aware of having in my possession any documents dating to my time as Editor of the *News of the World* or the *Daily Mirror* which might be relevant to the Inquiry, whether falling within the categories specified at page 3 of the Inquiry's Letter or otherwise. I left *News of the World* more than sixteen years ago in August 1995, and the *Daily Mirror* over seven years ago in May 2004, and have not retained any records relevant to the Inquiry from my time at either paper.

CONCLUDING OBSERVATIONS

72. I believe I have answered the questions posed of me in the Inquiry's Letter in full. Inevitably, the lapse of time since my tenure as Editor of *News of the World* and the *Daily Mirror* and the unavailability to me of relevant documentation with which to refresh my memory, has given rise to some limitation on the extent to which I can assist the Inquiry. However, Trinity Mirror and News International may be able to provide any specific factual details and access to documents which I have been unable to provide.

STATEMENT OF TRUTH

I believe that the facts stated in this statement are true.

Signed

PIERS MORGAN