

<p>1 2 (1.55 pm) 3 MS PATRY HOSKINS: Good afternoon, sir. The first witness 4 this afternoon is Mr Turner from the BPPA, the British 5 Press Photographers Association. 6 LORD JUSTICE LEVESON: Yes. 7 MR NEIL GAVIN TURNER (sworn) 8 Questions by MS PATRY HOSKINS 9 MS PATRY HOSKINS: Good afternoon, Mr Turner. Could you 10 please provide your full name to the Inquiry. 11 A. My name is Neil Gavin Turner. 12 Q. Thank you. Behind tabs 15 and 16 in the bundle, which 13 you should have in front of you, you will find the two 14 statements provided to the Inquiry by the BPPA. They're 15 not signed statements. Can I ask you, therefore, to 16 confirm that this is the evidence of the BPPA and that 17 the statements are true and accurate to the best of your 18 knowledge and belief? 19 A. I can confirm that. 20 Q. Thank you very much. I'm going to start with the first 21 statement, which is behind tab 15. 22 LORD JUSTICE LEVESON: Can I thank you for these 23 submissions, which are very helpful and do provide 24 a perspective on part of the work of the press which 25 hasn't been the subject of as much attention as other</p> <p style="text-align: center;">Page 1</p>	<p>1 A. And agencies. 2 Q. And agencies. Then employed on fixed or rolling 3 contracts, 12 per cent. Again, employed on fixed or 4 rolling contracts with the same sorts of bodies? 5 A. With various media organisations but primarily 6 newspapers and agencies. 7 Q. Then working through agencies as freelance 8 photographers, 18 per cent. So would that be someone 9 who was not employed by an agency but simply worked on 10 a freelance basis? 11 A. Who syndicates largely their images through an agency. 12 Q. Right. Then entirely freelance, 46 per cent, so by far 13 the largest number. 14 A. That's correct. 15 Q. Yes, would be photographers who work entirely on their 16 own account. 17 A. No, that would also include photographers like myself, 18 who work on Monday for one employer, on Tuesday for 19 a second employer and then Thursday and Friday on 20 a story that they've generated themselves. 21 Q. I understand. 22 LORD JUSTICE LEVESON: Can you say from your experience how 23 many photographers there are? I'm not talking about the 24 citizen photographers; I'm talking about those who make 25 their living doing what you do.</p> <p style="text-align: center;">Page 3</p>
<p>1 parts. 2 A. Thank you. 3 MS PATRY HOSKINS: I'm going to start with a brief 4 introduction into what the BPPA is and who it 5 represents. We can see that from the bottom of page 26 6 the first statement, 54177. The British Press 7 Photographers Association, you tell us, has among its 8 membership a large percentage of the country's 9 front-line news photographers. It was founded in 1984 10 and its aim is to promote and inspire the highest 11 ethical, technical and creative standards from within 12 the profession. 13 You then go on to say at the bottom of that 14 page that the BPPA can speak for press photographers 15 who, because of the highly fragmented nature of their 16 employment, may well speak to the BPPA when they would 17 not speak to the Inquiry. 18 You then set out a breakdown of your membership. 19 You say that your total membership is just fewer than 20 800. 21 A. That's correct. 22 Q. And it breaks down into sort of four categories. First 23 of all, directly employed photographers are 24 per cent 24 of your membership. Does that mean directly employed by 25 newspapers, magazines --</p> <p style="text-align: center;">Page 2</p>	<p>1 A. It's a very difficult figure to gather. We've spoken to 2 the government sector skills council, Skillset, to see 3 if they have a number. They don't have a number. The 4 best guess that we've seen is probably somewhere in the 5 region of 1,800 to 2,000. That includes a lot of 6 photographers who are directly employed by local and 7 regional newspapers, who are traditionally not our 8 members. 9 LORD JUSTICE LEVESON: Okay. Thank you. 10 MS PATRY HOSKINS: Can I ask about your role in the 11 organisation. 12 A. Yes. I am one of two vice chairman. I have been in 13 that position for several years now. I joined the BPPA 14 quite late, in 2003. Before being a vice-chairman, 15 I was the editor of the website. 16 Q. What I am going to do is take you through your 17 statement. I'm going to pick out a few key issues and 18 then I'm going to turn to the key proposals that you 19 have for the future, which you set out towards the end 20 of the first statement. Let's start with the statement 21 itself, please. 22 Page 4, just over from where we've been looking. 23 You explain at the start, under the heading "The culture 24 and practices of professional press photographers", that 25 one of the main problems highlighted by this Inquiry is</p> <p style="text-align: center;">Page 4</p>

<p>1 that the vocabulary used by the public and much of the 2 media regarding press photography is limited and largely 3 wrong. You go on to say that there is anecdotal 4 evidence that this is due to confusion about who you are 5 and what you do.</p> <p>6 Can you, in a nutshell, explain is to us what the 7 confusion is there and what it is that the public get 8 wrong?</p> <p>9 A. It's the overuse of the term "paparazzi" is the primary 10 problem. All of our members would tell you that they 11 frequently get called the paparazzi. It's usually in 12 a jokey way, but professional press photographers are 13 exactly that. They're people who do this for a living. 14 They do it professionally. They're not just some bloke 15 with a posh-looking camera. They are people who are 16 professionals.</p> <p>17 I guess the issue is in several of the statements 18 and several of the articles surrounding the early stages 19 of the Inquiry, words like "freelance" weren't always 20 used properly. Certainly, like I say, "paparazzi" was 21 used with ridiculous abandon, and it's just all of the 22 words that we see attached to photographer or used 23 instead of photographer are very, very, very largely 24 badly applied.</p> <p>25 Q. All right. Leading on from that, you tell us, down at Page 5</p>	<p>1 the very last paragraph I want to refer you to in this 2 context is at the top of page 6. You say that the 3 problems are exacerbated in various ways. You seem to 4 suggest that in other countries, photographers are given 5 rather freer access to buildings such as courts, 6 parliaments and committee hearings, and it's all a bit 7 difficult because in Britain you simply don't have the 8 same access.</p> <p>9 Are you suggesting that in the UK there should be 10 freer access to such buildings such as courts, 11 parliaments and committee hearings? You appear to 12 suggest that even at this Inquiry photographers are 13 limited to being out in the street. You seem to have 14 a problem with that. Is that an unfair characterisation 15 of what you're saying?</p> <p>16 A. It's not a problem in terms of that's the way it has 17 been certainly since before I joined the profession, but 18 you have to put this into a context where television 19 news has access to the footage from this room, 20 television news has the ability to shoot all sorts of 21 cut-away shots and build a story, to do interviews to 22 camera. We, as still photographers, have to sum up all 23 of that in a single frame, and when you're restricted to 24 a single position in a cold or freezing street outside, 25 where you're going to have three seconds to grab the Page 7</p>
<p>1 the bottom of page 4, that the activities of press 2 photographers are not limited, of course, to celebrity 3 photographs. They can range from sports action to press 4 conferences, and from feature case studies to war and 5 famine. You then go on to say:</p> <p>6 "Most professional photographers will have touched 7 all of those subjects as well as the red carpet events, 8 doorsteps and other genuine jobs that seem to have been 9 labelled as paparazzi by a lot of commentators."</p> <p>10 That's a fair point, of course.</p> <p>11 Turn to page 5, just over the page. You say, 12 second-last paragraph:</p> <p>13 "To flesh that out a little, we find ourselves 14 responding to news stories, many of which are still 15 breaking, with very little information and a lot of 16 expectations from our newspapers ... the news agenda 17 dictates that we often operate in direct competition to 18 one another on the same story -- which results in what 19 lazy television journalists often refer to as a pack of 20 photographers or a mass of paparazzi."</p> <p>21 Then you go on to say:</p> <p>22 "The behaviour of professional photographers, even 23 in a pack, is normally good, ethical and entirely 24 legal."</p> <p>25 If we just try to set the context for my question, Page 6</p>	<p>1 picture you want, and you're standing shoulder to 2 shoulder with 20 other people and television crews are 3 there in the way as well, then clearly we don't have, as 4 a media, I guess what you would call a level playing 5 field.</p> <p>6 Q. Are you suggesting there should be a bank of 7 photographers at the back of the room here?</p> <p>8 A. I think that the time has come when it should be 9 investigated whether a single stills photographer or 10 a limited number of stills photographers with, you know, 11 the right equipment, now we can shoot in really low 12 light, be admitted to some of these hearings, because if 13 we want -- or if our newspapers that we work for want to 14 run stills from here, if I said something extremely 15 controversial now, they would have to run a still 16 grabbed from what is relatively low quality video, and 17 certainly not up to the technical requirements of 18 newspapers.</p> <p>19 So I'm not overtly suggesting that we open it up to 20 stills photographers. I guess what we're doing in this 21 part of the statement is creating a background by which 22 we're explaining why some of the actions that we have to 23 take, quite legally and ethically still, to get our 24 pictures have to be taken and possibly suggesting ways 25 that, you know, some of the issues that you might point Page 8</p>

<p>1 to could be overcome.</p> <p>2 Q. Another solution that you seem to be suggesting, right</p> <p>3 at the end of page 6, is that people who are the subject</p> <p>4 of your photographs could be a bit more relaxed about</p> <p>5 giving up their photograph. You say this:</p> <p>6 "Professional news photographers have one goal: to</p> <p>7 get good, interesting pictures that editors will want to</p> <p>8 use. None of us enjoys the process of having to wait on</p> <p>9 wet and windy pavements for hours and nobody actually</p> <p>10 wants to chase cars down the road because people</p> <p>11 involved in news stories haven't got the sense to stop</p> <p>12 and talk for two minutes."</p> <p>13 Now, is that paragraph intending to suggest that</p> <p>14 those involved in news stories should, in most</p> <p>15 situation, be able to just stop and talk to</p> <p>16 photographers and allow their photograph to be taken?</p> <p>17 A. I think there's definitely an element where if people</p> <p>18 did then, you know, again, a lot of the issues and a lot</p> <p>19 of the problems that are seen to arise could be sorted</p> <p>20 out. I mean, this is a tiny percentage of what we do,</p> <p>21 a really tiny percentage, but it happens and, you know,</p> <p>22 we have it within our powers as a society to kind of</p> <p>23 just change a few attitudes and then overcome possible</p> <p>24 issues.</p> <p>25 LORD JUSTICE LEVESON: And those who don't want to be</p> <p style="text-align: center;">Page 9</p>	<p>1 A. The marketplace, in a nutshell, and a manifestation of</p> <p>2 the marketplace would be the chain of command within</p> <p>3 newspapers, but I don't think any particular one group</p> <p>4 of individuals is to blame. It's just that atmosphere</p> <p>5 where we see things on television, on live rolling news,</p> <p>6 and newspapers require stills of what you can see on</p> <p>7 television.</p> <p>8 We've pointed out that here at this Inquiry, before</p> <p>9 it started, news photographers got together with the</p> <p>10 officials of the court and put the pen that you see</p> <p>11 which we've all walked past to get in. That was put</p> <p>12 there at the request of press photographers to give us</p> <p>13 some kind of semblance of order at the Inquiry, and when</p> <p>14 witnesses, especially the high profile witnesses that</p> <p>15 appeared in the early weeks, came in that entrance,</p> <p>16 walked past, got their pictures taken, didn't stop and</p> <p>17 pose for pictures, just passed by, everything's fine.</p> <p>18 Unfortunately, one very, very high profile witness</p> <p>19 chose, completely within her rights, to come in through</p> <p>20 another entrance --</p> <p>21 Q. Is this your second witness statement?</p> <p>22 A. Yes.</p> <p>23 Q. Can we turn to this. Tab 16. I think you identify the</p> <p>24 person as being JK Rowling.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 11</p>
<p>1 photographed?</p> <p>2 A. Well, we have the Press Complaints Commission code of</p> <p>3 conduct, which we absolutely insist that people sign up</p> <p>4 to -- or abide by, and if someone says, "I don't want my</p> <p>5 picture taken", then under the PCC code, you stop taking</p> <p>6 their picture.</p> <p>7 MS PATRY HOSKINS: I'm going to turn to page 7 of your</p> <p>8 statement, please, under the heading "The marketplace</p> <p>9 for news pictures and how it affects those cultures and</p> <p>10 practices". I'm going to ask you about the</p> <p>11 second-to-last paragraph on that page.</p> <p>12 You explain, in a nutshell, that freelancers and</p> <p>13 other photographers are having to find exceptional</p> <p>14 pictures, and you say that this is all happening at</p> <p>15 a time when newspapers' circulation is still dropping</p> <p>16 and work is actually thinner on the ground. You then</p> <p>17 say, at the end of the paragraph, that you have had</p> <p>18 several reports from photographers who have expressed</p> <p>19 reservations about being told to shoot pictures that</p> <p>20 would be regarded as unethical and/or in contravention</p> <p>21 of the PCC Editors' Code.</p> <p>22 Without naming any names, can you tell us who has</p> <p>23 told photographers to shoot pictures that would be</p> <p>24 regarded as unethical or in contravention of the PCC</p> <p>25 Editors' Code? Who puts that pressure on?</p> <p style="text-align: center;">Page 10</p>	<p>1 Q. I didn't mean to interrupt, I just wanted to make sure</p> <p>2 we had the right document.</p> <p>3 A. No, we do, we do.</p> <p>4 And it became apparent that a lot of the agencies</p> <p>5 and a lot of the newspapers wanted the photographers to</p> <p>6 get pictures of JK Rowling leaving, and we've spoken to</p> <p>7 a lot of people who were very uneasy about that, and all</p> <p>8 of them made a conscious decision, you know: "Well, if</p> <p>9 I do go and photograph her leaving despite the fact that</p> <p>10 she clearly is not wanting to have her picture taken,</p> <p>11 will I be breaking any law? No. Will I be breaking any</p> <p>12 PCC ethical code? Probably not. Let's see when we get</p> <p>13 there." So individual photographers made the decision</p> <p>14 whether they would themselves go and take that picture</p> <p>15 or whether they wouldn't. Some did and some didn't, and</p> <p>16 some freelancers who make their living entirely based on</p> <p>17 whether they get, you know, the better picture than</p> <p>18 anyone else, one or two of them decided that that would</p> <p>19 be something they felt they needed to do too.</p> <p>20 LORD JUSTICE LEVESON: So it requires rather more discipline</p> <p>21 by those who want to publish these photographs to make</p> <p>22 sure that they are obtained without breach of the code?</p> <p>23 A. Absolutely, yes, yes. And I do believe, unless someone</p> <p>24 can tell me otherwise, that all the photographs taken on</p> <p>25 that day were actually taken without breaching the code.</p> <p style="text-align: center;">Page 12</p>

<p>1 LORD JUSTICE LEVESON: I don't know.</p> <p>2 A. I mean, as far as I'm aware. I wasn't there personally,</p> <p>3 but I've spoken to several people who were, and that's</p> <p>4 what I'm led to believe, so --</p> <p>5 MS PATRY HOSKINS: Can I summarise your evidence: there was</p> <p>6 an agreement that photographers attending the Inquiry</p> <p>7 would stand behind barriers outside the exit that we</p> <p>8 walk through, yes?</p> <p>9 A. Mm-hm.</p> <p>10 Q. And the agreement was that they would remain behind</p> <p>11 those barriers and that's where they would obtain</p> <p>12 photographs and nowhere else, yes?</p> <p>13 A. That was the agreement made between photographers and</p> <p>14 the court officials.</p> <p>15 Q. You say this in your second statement:</p> <p>16 "Several photographers were ordered by their papers</p> <p>17 to get a picture of her [this is Ms Rowling], even if</p> <p>18 that meant suspending the agreement about only working</p> <p>19 from within the barriers. Others felt enormous pressure</p> <p>20 without hearing from their editors."</p> <p>21 I don't want you to name any names or any</p> <p>22 newspapers, but can you confirm that you've been told,</p> <p>23 and if so in which circumstances, that photographers</p> <p>24 were ordered by UK national newspapers to obtain</p> <p>25 photographs in this way, despite the fact that it would</p> <p style="text-align: center;">Page 13</p>	<p>1 refers to them". They're causing the profession a lot</p> <p>2 of problems and later on in this statement, you refer to</p> <p>3 their actions as "sometimes illegal and unethical".</p> <p>4 Can you tell us a bit about the illegal and</p> <p>5 unethical activities of these types of photographers</p> <p>6 that you're trying to describe?</p> <p>7 A. They're very well described in some of the witness</p> <p>8 statements of some of the core participants in the first</p> <p>9 couple of weeks, but they do involve chasing people down</p> <p>10 the road, driving dangerously/illegally. They do</p> <p>11 involve initiating a reaction and a response from people</p> <p>12 to get different facial expressions, you know, in a kind</p> <p>13 of completely over-the-top way. They do involve the</p> <p>14 trying to photograph women in compromising ways to show</p> <p>15 you either -- what they're wearing under their skirts.</p> <p>16 Q. Lying on the pavement and taking photographs up their</p> <p>17 skirts?</p> <p>18 A. Yeah, and you know, holding cameras in strange</p> <p>19 positions. Working in packs deliberately. Deliberately</p> <p>20 running in front of people. I mean, you know, hearsay,</p> <p>21 I'm afraid, but I've heard it second-hand that they've</p> <p>22 seen one photographer deliberately get into a fight with</p> <p>23 a celebrity so a second photographer, with whom they</p> <p>24 were working as a team, could get the picture of the</p> <p>25 fight and split the money. That is hearsay, but I'm</p> <p style="text-align: center;">Page 15</p>
<p>1 breach the agreement?</p> <p>2 A. I'm prepared to say that photographers working for UK</p> <p>3 newspapers and/or agencies were ordered in such a way.</p> <p>4 Q. Have you spoken to the photographers concerned who were</p> <p>5 ordered to do this?</p> <p>6 A. Yes, I have.</p> <p>7 Q. I know it's hearsay evidence, but they've spoken to you</p> <p>8 directly about it, have they?</p> <p>9 A. Yes.</p> <p>10 Q. Is there anything else that you want to say about that</p> <p>11 particular incident before I move on?</p> <p>12 A. Only that the arrangement -- I've said this twice, but</p> <p>13 I think it bears saying again. The arrangement was made</p> <p>14 by photographers, who could see that there was going to</p> <p>15 be an issue. They took it upon themselves to make those</p> <p>16 arrangements. No one did it for them.</p> <p>17 Q. Can we turn to page 9 of the first statement, please,</p> <p>18 behind tab 15. It's under the heading "The problems</p> <p>19 that the market for celebrity images are causing", and</p> <p>20 you explain in the second-to-last paragraph that people</p> <p>21 who look like press photographers and use much the same</p> <p>22 equipment as press photographers and whose pictures</p> <p>23 often end up in the press are causing much of the</p> <p>24 problem. You call them "celebrity-chasing amateur</p> <p>25 paparazzi -- or stalkarazzi, as Professor Greenslade</p> <p style="text-align: center;">Page 14</p>	<p>1 pretty sure it's happened, having observed some of these</p> <p>2 guys at work.</p> <p>3 Q. That particular incident might be hearsay but all the</p> <p>4 other incidents that you describe, have you witnessed</p> <p>5 those yourself?</p> <p>6 A. I have to admit that I've only spent one night observing</p> <p>7 these guys at work. This was about two years ago.</p> <p>8 I was in town at night and I thought: "I'll go and have</p> <p>9 a watch and go to one or two of the haunts and have</p> <p>10 a look at them." And you know, I was fairly upset with</p> <p>11 some of the activities, it has to be said, yes, and I do</p> <p>12 want to draw kind of the word "illegality" into this,</p> <p>13 because what they were doing wasn't -- well, it was</p> <p>14 unethical but a lot of it was also illegal.</p> <p>15 Q. All right. So when the celebrities spoke of the various</p> <p>16 things that had happened to them -- being chased, being</p> <p>17 spat at to gauge a reaction, being chased in cars in</p> <p>18 a way that was dangerous -- you wouldn't doubt that they</p> <p>19 were telling the truth, would you?</p> <p>20 A. I would not doubt that those incidents have happened,</p> <p>21 yes.</p> <p>22 Q. Can I ask you about privacy laws versus the public</p> <p>23 interest. This is section 4 of your statement at</p> <p>24 page 11 onwards. Here I think you're setting out an</p> <p>25 objection to a new privacy law. I think the chairman</p> <p style="text-align: center;">Page 16</p>

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<p>1 will have read this section and I don't think we need to 2 ask you about it in any detail but I want to pick you up 3 on one matter, please. It's page 11, the second-last 4 paragraph. You're talking about French law and about 5 restrictive privacy rights in France. You're giving 6 a number of examples there and essentially saying that 7 the French privacy laws go too far in your opinion. 8 Would that be a fair assessment?</p> <p>9 A. I think the assessment would be that the problem with 10 French privacy law, as we understand it -- clearly none 11 of us are French lawyers. We've spoken to photographers 12 who have worked in France and they say it's not 13 necessarily the laws, what it is, it's the 14 interpretation of the laws and the way that the news 15 organisations have chosen to function in France for fear 16 of contravening those laws that is actually the issue.</p> <p>17 Q. Let me pick you up on one point. In the second-last 18 paragraph, you refer to two politicians, Mr Strauss-Kahn 19 and former president Francois Mitterrand. You say they 20 had hidden elements of their private life from view 21 using this law that, had it been known to the public, 22 might have cost them elections and therefore their jobs. 23 But have you considered whether or not there are 24 cultural elements which might mean that the French 25 public may not need to know or may not have wanted to</p> <p style="text-align: center;">Page 17</p>	<p>1 of all media -- not just newspapers but certainly 2 websites, possibly blogs, if it could be done -- that 3 when they publish photographs in their newspapers, show 4 them on television, have them on their websites, that 5 they have had to go through a series of tests to prove 6 beyond, you know, reasonable doubt or whatever level of 7 test that the people who put this into place demand, 8 that those photographs were sourced ethically, legally 9 and in a number of other ways.</p> <p>10 Q. What would the tests be?</p> <p>11 A. I think we haven't set out a series of tests because, 12 you know, this set of proposals was put together 13 reasonably quickly and we felt that until we'd had 14 a great long conversation about what we thought the 15 tests should be, then maybe we should just talk about 16 tests and let greater minds other than ours come up with 17 the solutions. But you know, the number of tests -- you 18 would speak to the photographer, say, "Where were you 19 when you took the picture? Did you engage in 20 conversation with the person concerned? Did the person 21 concerned ask you to stop taking pictures? Are you 22 aware of the PCC code of conduct?" or whichever code of 23 ethics that photographer is operating under. "Were you 24 aware of all the ethical and legal consciences and do 25 you think that you abided by all of those</p> <p style="text-align: center;">Page 19</p>
<p>1 know about the person --</p> <p>2 A. Cultural elements notwithstanding, I mean, people who 3 are in favour of privacy law in this country talk about 4 French privacy law in a way that they seem to want to 5 import it -- not exactly wholesale, because they have 6 a different legal system, but to import huge chunks of 7 it. So it doesn't matter whether it's a cultural issue. 8 It's because if we imported a French privacy law here 9 without kind of huge references to our culture and our 10 legal system, then we would be in the same danger.</p> <p>11 Q. Let's turn, please, to your four-pronged approach as the 12 solutions to the future. Section 5, page 13.</p> <p>13 You say in the second paragraph that your board is 14 of the opinion that you need a four-pronged strategy. 15 I'm going to take you through each and ask you to 16 explain in very brief terms. Can I say from the outset 17 that you specifically say that this does not amount to 18 licensing of press photographers.</p> <p>19 A. Absolutely not.</p> <p>20 Q. And you would not want it categorised in that way. 21 Bearing that caveat in mind, can you tell us about the 22 four. The first is having a system of clear and strict 23 tests applied before publication of any photograph. Can 24 you tell us about that?</p> <p>25 A. Yeah, I mean, the duty should be placed on all editors</p> <p style="text-align: center;">Page 18</p>	<p>1 considerations?"</p> <p>2 Q. All right, so essentially asking them a series of 3 questions with a view to finding out whether or not the 4 picture was taken in a way that might have invaded 5 someone's privacy? Isn't that what happens already, or 6 isn't that what should happen already?</p> <p>7 A. I do not pretend to work on a picture desk. I don't 8 think that I'm the right person to answer those 9 questions.</p> <p>10 Q. Okay. The second relates to UK press cards. You 11 say that essentially if someone held a UK press card, 12 then there would be a lower standard of checking and 13 proof because the photographer holding the press card 14 would have already performed tests as they were shot. 15 I think you're suggesting that if someone held a press 16 card, they would somehow be held in higher esteem than 17 someone who didn't hold such a press card, and you could 18 rely on the images produced by such a person rather more 19 easily. Is that fair?</p> <p>20 A. I think that's a fairly good summation. I think -- the 21 UK press card scheme already requires that you have 22 a track record as a working journalist to get one, and 23 I think in parallel with part three of this four-pronged 24 approach, I think it would be fair to say that people 25 holding UK press cards, you know, should be held to</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 a much higher standard of ethics because they would have 2 signed up to the relevant codes, and therefore 3 newspapers could use their work with a greater degree of 4 security and certainty, without having to perform 5 time-consuming and difficult series of tests.</p> <p>6 Q. Thirdly, you say that the press card scheme could be 7 strengthened by having an enforceable code of conduct 8 which would include the suspension and cancellation of 9 cards. Presumably in situations where someone acted 10 unethically, they could have their press cards suspended 11 or cancelled? Is that the suggestion?</p> <p>12 A. Absolutely. And actually, you know, can I make one 13 small kind of subcorrection here: the UK Press Card 14 Authority does already suspend and cancel cards. The 15 BPPA is a card-issuer and we have done that. So the 16 press card scheme already does have the ability to do 17 that, and re-reading this, it kind of implies that it 18 doesn't, and it does.</p> <p>19 Q. Okay.</p> <p>20 Finally, you would agree a simply outline about 21 exactly which laws would apply to photographers when 22 they are going about their legitimate business. 23 Trespass, assault, intimidation, harassment and so on. 24 Can you just explain that to us briefly?</p> <p>25 A. Yes. Sorry, could I just refer to a couple of notes</p> <p style="text-align: center;">Page 21</p>	<p>1 those people who are kind of out there with their camera 2 trying to make a bit of money, would see that there's 3 a framework like this within which the people they may 4 be -- some of them aspire to be would be operating 5 within those systems and equally fall in line.</p> <p>6 We are professionals and I don't think many of our 7 members ever fall foul of any of that legislation anyway 8 because they're all fairly well aware of it, but it 9 doesn't hurt to kind of really underline what could be 10 done and what is out there.</p> <p>11 MS PATRY HOSKINS: Can I just ask you one question on your 12 four-pronged approach. You said at the outset that one 13 of the real concerns is stalkerazzi, people who arm 14 themselves with a camera, don't have any experience, 15 don't behave like real press photographers. I'm 16 struggling to see how this four-pronged strategy would 17 deal with that kind of situation. Presumably newspapers 18 and magazines would be still entitled to buy photographs 19 from these people? They wouldn't be required to have 20 a press card, so there would still be a market for their 21 photographs. Even if there were a series of clear and 22 strict tests applied before their photographs could be 23 purchased, nevertheless, if the photograph was good 24 enough or interesting enough, it would be purchased, and 25 therefore the market would still exist and the</p> <p style="text-align: center;">Page 23</p>
<p>1 I've made?</p> <p>2 Q. Of course.</p> <p>3 A. What we would be seeking really would be -- and I'm 4 quoting from myself here -- a simple and robust 5 explanation of the relevant legislation that recognises 6 and encapsulates best practice. A credit card size 7 pocket note, if you like, and pages on websites that 8 outline all of the relevant statutes that really could 9 take effect.</p> <p>10 I realise that's not a simple task and I know we 11 have a roomful of lawyers here who probably would rub 12 their hands with glee --</p> <p>13 LORD JUSTICE LEVESON: No, I think what the roomful of 14 lawyers would say is there's an enormously weighty tome 15 which does that exercise, and to get it onto one card 16 would defeat even the most erudite of them.</p> <p>17 A. Okay, I'll take that for sure. But I mean certainly 18 kind of outlining which areas of the law photographers 19 could be in danger of breaching and hopefully, because 20 we're professionals, we would do the background reading 21 that goes behind all of that and kind of, you know, be 22 much more aware of what goes on.</p> <p>23 Equally, you know, what we're trying to do here is 24 kind of -- by creating systems like this for 25 professionals, hopefully those aspiring professionals,</p> <p style="text-align: center;">Page 22</p>	<p>1 competition between photographers would still exist. 2 How does your strategy deal with the problem of 3 stalkerazzi at all?</p> <p>4 A. There's two answers to that, I'm afraid. The first is 5 that if those tests did exist and were applied, then 6 those images wouldn't be purchased. However, if 7 publishers want to purchase those images and want to 8 publish them, then they would be somehow in breach of 9 the requirement for due diligence placed upon them.</p> <p>10 LORD JUSTICE LEVESON: They're responsible for what they put 11 into their newspaper.</p> <p>12 A. Precisely.</p> <p>13 LORD JUSTICE LEVESON: If that photograph has been taken in 14 breach of the code of practice, they're responsible for 15 that breach, even if they didn't know about it?</p> <p>16 A. I think that would be a very fair assessment, yes.</p> <p>17 MS PATRY HOSKINS: You said there were two parts to your 18 answer.</p> <p>19 LORD JUSTICE LEVESON: I think we've got the one.</p> <p>20 A. I'm afraid --</p> <p>21 MS PATRY HOSKINS: You're happy?</p> <p>22 A. Yes.</p> <p>23 Q. Thank you very much. Was there anything that you wished 24 to add? I think I've covered the points I wanted to 25 cover, but I want to the give out opportunity to add</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 anything.</p> <p>2 A. We came here today, at your kind invitation, wanting to</p> <p>3 put forward our approach to help solve the problem. The</p> <p>4 BPPA is an organisation of professionals and we want to</p> <p>5 be part of the solution. We don't want to be seen as</p> <p>6 part of the problem, because we don't feel that we are</p> <p>7 part of the problem, and if any of our members are part</p> <p>8 of the problem, then we would like to be able to sort</p> <p>9 that out. You know, in the conclusions, we say that we</p> <p>10 want to provide assurances to the general public that</p> <p>11 professional journalists exist and our work is ethical,</p> <p>12 legal and trustworthy, and I think that's important.</p> <p>13 We've talked a little bit about the United Kingdom</p> <p>14 press card authority, and I know that Mr Dacre's</p> <p>15 evidence yesterday touched on this. The gatekeepers of</p> <p>16 the organisations who form the UK Press Card Authority</p> <p>17 are a deliberately diverse bunch and they operate in</p> <p>18 such a way that no single person can have to apply for</p> <p>19 that press card through one single route. So as</p> <p>20 a photographer, I can get my press card through the</p> <p>21 BPPA, I can join the NUJ, I might do it through the NPA,</p> <p>22 and that's a really important principle because, you</p> <p>23 know, if, as a photographer, you fall foul of one</p> <p>24 particular organisation, you can still apply for a press</p> <p>25 card through one of the others as long as you haven't</p> <p style="text-align: center;">Page 25</p>	<p>1 the oath you took when last you came.</p> <p>2 A. Very good.</p> <p>3 LORD JUSTICE LEVESON: I'm grateful to you for returning.</p> <p>4 You will appreciate that my interest in the contents of</p> <p>5 your second statement is not prurient or seeking to</p> <p>6 unpick that particular decision, but rather the wider</p> <p>7 perspective which falls within my terms of reference.</p> <p>8 A. I do. And Lord Justice Leveson, if you'll allow me,</p> <p>9 there is one thing I would like to say, which is in the</p> <p>10 last couple of weeks I've learned a great deal more</p> <p>11 about what happened in this incident. As editor of the</p> <p>12 paper, I'm responsible for what it does and what its</p> <p>13 journalists do, and so I want to say at the outset that</p> <p>14 I sorely regret the intrusion into Richard Horton's</p> <p>15 email account by a journalist then in our newsroom. I'm</p> <p>16 sure that Mr Horton and many other people expect better</p> <p>17 of the Times; so do I. So on behalf of the paper,</p> <p>18 I apologise.</p> <p>19 LORD JUSTICE LEVESON: Thank you, Mr Harding. You will</p> <p>20 appreciate that nothing that you're discussing today is</p> <p>21 relevant to the litigation between Mr Horton and the</p> <p>22 Times. If Mr Horton wants to pursue some remedy, that</p> <p>23 will be a matter for him --</p> <p>24 A. Of course.</p> <p>25 LORD JUSTICE LEVESON: -- to take advice and to do what he</p> <p style="text-align: center;">Page 27</p>
<p>1 committed offences and had your press card suspended.</p> <p>2 That's an important point.</p> <p>3 So we have quite a lot of the tools at our disposal</p> <p>4 already. We have a body in the UK PCA that has a track</p> <p>5 record, and also we have a group of people amongst</p> <p>6 photographers who have a serious track record.</p> <p>7 For example, we were involved in drawing up a series</p> <p>8 of guidelines with the Association of Chief Police</p> <p>9 Officers for the way that photographers and the police</p> <p>10 work together on the street, and largely that works</p> <p>11 rather well. That was done by us.</p> <p>12 So, like I say, we want to be part of the solution</p> <p>13 and that's our entire reason for putting up the series</p> <p>14 of proposals in the submission.</p> <p>15 MS PATRY HOSKINS: I'm very grateful to you.</p> <p>16 LORD JUSTICE LEVESON: Mr Turner, thank you very much</p> <p>17 indeed. Responsible photographers, like responsible</p> <p>18 journalists, are not part of the problem and they do</p> <p>19 need to be part of the solution. Thank you very much.</p> <p>20 A. Thank you, sir.</p> <p>21 MR JAY: Sir, the next witness is Mr Harding, who has been</p> <p>22 recalled, please.</p> <p>23 LORD JUSTICE LEVESON: Thank you.</p> <p>24 MR JAMES HARDING (recalled)</p> <p>25 LORD JUSTICE LEVESON: Mr Harding, you're still subject to</p> <p style="text-align: center;">Page 26</p>	<p>1 feels is appropriate.</p> <p>2 A. Of course.</p> <p>3 Questions by MR JAY</p> <p>4 MR JAY: Mr Harding, we're referring now of course to your</p> <p>5 second witness statement, which is dated 6 February,</p> <p>6 yesterday's date. It possesses four exhibits. That</p> <p>7 statement has s a statement of truth and you've signed</p> <p>8 it and again, it's your additional formal evidence to</p> <p>9 the Inquiry; is that right?</p> <p>10 A. That is right, yes.</p> <p>11 Q. Some of it I think I can summarise. Some of it I'm</p> <p>12 going to have to address with more care, since there's</p> <p>13 quite a lot of detail here and the full picture can't</p> <p>14 emerge unless we do cover the detail.</p> <p>15 You say in paragraph 4 that the reporter who was</p> <p>16 involved in this was Mr Patrick Foster, who, as you say,</p> <p>17 was a staff reporter aged 24 at the time of the</p> <p>18 incident; is that correct?</p> <p>19 A. Yes, that's correct.</p> <p>20 Q. Your understanding is that in May 2009, he, on his own</p> <p>21 initiative, sought to identify NightJack, then an</p> <p>22 anonymous blogger, a police officer, and he did so, on</p> <p>23 your understanding, by accessing NightJack's email</p> <p>24 account. Is that correct?</p> <p>25 A. Yes, that's what I now understand.</p> <p style="text-align: center;">Page 28</p>

<p>1 Q. I think the evidence which supports this, and indeed 2 ties it into a date, namely 19 May 2009, is page 1 of 3 exhibit JH4.</p> <p>4 A. Yes.</p> <p>5 Q. This is from Mr Foster to Mr Barrow, who you tell us was 6 the then home news editor, to whom Mr Foster reported: 7 "Martin, sorry to bother you. Do you have five 8 minutes to have a quick chat about a story -- away from 9 the desk, down here in the glass box, perhaps?"</p> <p>10 The fact that it's away from the desk might give 11 rise to certain inferences, but tying that in with what 12 you know now, you believe that the email hacking 13 probably occurred just before this email was sent?</p> <p>14 A. Just to be clear, Mr Jay, I know the basis of this is 15 exactly this email, which came to my attention in the 16 last week.</p> <p>17 Q. Yes. I'm not suggesting for one moment, Mr Harding, 18 that you saw this at the time. You've done some 19 detective work and --</p> <p>20 A. Since then; correct.</p> <p>21 Q. -- the picture has been pieced together.</p> <p>22 A. Correct.</p> <p>23 Q. In paragraph 9 of your statement, you tell us that 24 Mr Foster also informed Mr Alastair Brett, the then 25 legal manager of the Times and the Sunday Times, and you</p> <p style="text-align: center;">Page 29</p>	<p>1 "Alastair on side. SB ..."</p> <p>2 That's Mr Bevan, who is referred to in the lower 3 email.</p> <p>4 A. Mm.</p> <p>5 Q. "... has sent typically polite email below. Am trying 6 to talk it out of paper this Saturday for three reasons: 7 (1) am away this Friday, (2) want a little more time to 8 put ducks in a row and pix ..."</p> <p>9 That presumably is photographers?</p> <p>10 A. Yes.</p> <p>11 Q. "... (3) want little more space between the dirty deed 12 and publishing."</p> <p>13 That gives rise to a fairly clear inference, doesn't 14 it?</p> <p>15 A. It does. What I should say -- and that's the reason 16 I mentioned, Mr Jay, that it's important to understand 17 that a great deal of what we now know we have learnt as 18 a result of pulling up all of the past emails between 19 the parties involved, making sure that we now, for the 20 first time, look at the legal correspondence, the nature 21 of the legal instruction, the legal arguments and the 22 transcript of what happened in court. All of this has 23 been made available in the last week.</p> <p>24 I think one of the questions that we'd originally 25 had a long time ago was: what exactly had Mr Foster</p> <p style="text-align: center;">Page 31</p>
<p>1 think that took place on 20 May, and you invite our 2 attention to a couple of other emails in this email 3 stream.</p> <p>4 A. Yes.</p> <p>5 Q. Page 2 of JH4.</p> <p>6 A. Yes.</p> <p>7 Q. I'm afraid I don't know whether this material is yet on 8 our system so I'm not able to provide the unique 9 reference numbers, for which I must apologise. 10 I imagine they probably have been put on the system, but 11 I'm working from a bundle which was prepared by 12 Linklaters, my assistants, so I don't have the 13 page numbers.</p> <p>14 A. Right.</p> <p>15 Q. But I'll read it out: 16 "Hi Alastair, sorry to bother you. Do you have five 17 minutes today? I need to run something past you." 18 So this is all part of the same picture.</p> <p>19 A. Yes. Just to be clear, my understanding is that when 20 Mr Foster went to Martin Barrow, Martin Barrow then 21 said, "You have to go and see the company's legal 22 manager, Alastair Brett."</p> <p>23 Q. Thank you. Page 4, please, of this sequence of emails. 24 Still on 20 May in the late afternoon, Mr Foster to 25 Mr Barrow:</p> <p style="text-align: center;">Page 30</p>	<p>1 done, whether or not -- and what role that had played in 2 his investigation into the identification of NightJack? 3 Clearly, this email suggests that he wanted to put some 4 space between what he'd done in seeking access to that 5 email account and his efforts to identify him using 6 legitimate sources.</p> <p>7 Q. Yes, because those efforts started at page 5 --</p> <p>8 A. Yes.</p> <p>9 Q. -- on 27 May 2009. I think that says: 10 "Have pic of him [that's obviously picture] with 11 computer. Going to start fronting up process." 12 The way I read that is that he's going now to look 13 at public domain information to see whether NightJack 14 can be identified by that route. Is that the inference 15 you've drawn?</p> <p>16 A. Yes. I'm in the same spot as you are here in trying to 17 piece this together solely through what remains in terms 18 of the email traffic, but yes, I drew the same 19 conclusion.</p> <p>20 Q. Of course, what was happening here was that if the dirty 21 deed, as it did, encompassed hacking into an email 22 account and knowing the name of NightJack, then it was, 23 as another witness has said, rather like working from 24 the inside of the maze out, rather than from the outside 25 in?</p> <p style="text-align: center;">Page 32</p>

8 (Pages 29 to 32)



<p>1 A. Yes, absolutely. The issue has been: having not known 2 previously exactly what he's done, the choices that we 3 faced -- and my original understanding was that it had 4 left us open to the perception that he was setting out 5 to find -- setting out asking questions to which he 6 already knew the answers. In fact, I think what's clear 7 from these emails is that indeed he did already have the 8 answers.</p> <p>9 Q. Yes. It goes slightly further than that. If you go to 10 page 7, please, Mr Foster to Mr Barrow: 11 "So have spoken to Horton [he, of course, is 12 NightJack, who doesn't confirm or deny it] and says he 13 will lose his job ..."</p> <p>14 So that in itself was a pretty strong clue that he'd 15 found the right man, but of course he knew that anyway 16 because he'd been into his email account. I read on: 17 "... even though he says he's gone nothing wrong."</p> <p>18 So the evidence was there, from Mr Foster's 19 perception from the email account, and he'd also had 20 this conversation with Mr Horton himself, who neither 21 confirmed nor denied the attribution. That is right, 22 isn't it?</p> <p>23 A. Well, I understand -- I think we've jumped a little bit 24 ahead of ourselves. My understanding is that what has 25 happened is Mr Foster has gone to Martin Barrow. Martin</p> <p style="text-align: center;">Page 33</p>	<p>1 sufficient information to lead you to believe that the 2 original basis of the story had been email hacking, you 3 would not have published; is that correct?</p> <p>4 A. Yes. I think -- let me just address this. This is -- 5 there's a danger that we get ourselves into a world of 6 hypotheticals. If X, would you have done why? 7 I imagine we'll get to the conversation about the 8 decision to publish, and we should address it within the 9 context of, I guess, a number of issues that we faced. 10 One was the public interest discussion. Two was the 11 High Court judgment. Three was the fact that Lancashire 12 Constabulary had already been contacted, and then four, 13 in addition, was the behaviour of Mr Foster.</p> <p>14 Q. Yes. Working through JH4 slightly further, Mr Harding, 15 I think we can probably move ahead to page --</p> <p>16 A. Mr Jay, sorry, I should say one other thing.</p> <p>17 Q. Of course.</p> <p>18 A. Of course you are -- behind your question is the subject 19 of a discussion we had when I was here last, which was 20 about: where do you weigh the public interest issue 21 versus a level of intrusion? I think that I should also 22 be clear that if Mr Foster had come to me and said, 23 "I would like to seek unauthorised access to a person's 24 email account in order to identify a police officer as 25 an anonymous blogger", I would have said that I did not</p> <p style="text-align: center;">Page 35</p>
<p>1 Barrow has said, "There's an issue here. You need to go 2 see Alastair Brett, the lawyer." Once Alastair Brett 3 then is -- according to later emails, in his words, 4 "tears a strip off Mr Foster" and says if he wants to 5 pursue this story, he has to do so by proper 6 journalistic endeavour, Mr Foster then does that and 7 then, as would normally be expected by a journalist at 8 the paper, seeks to confirm his identity by calling him 9 directly. As I understand it, Mr Brett also insisted 10 that Mr Foster would do that. Again, I piece that 11 together from the emails that we have here.</p> <p>12 Q. Yes, but what was said by Mr Brett and Mr Barrow to 13 Mr Foster, namely: "Obtain your information by 14 legitimate means (after having obtained it first 15 illegitimately)", is that a journalistic practice that 16 you would support or repudiate?</p> <p>17 A. Thank you for the question, Mr Jay. No, of course not. 18 To be absolutely clear, if Mr Foster had come to me and 19 said that he had done this (a), we would have taken the 20 disciplinary action that we did take and I would have 21 told him immediately to abandon the story, because 22 regardless of what information he did or didn't get, as 23 I say, it lays the newspaper wide open to that charge. 24 So no, I squarely do not approve of what happened.</p> <p>25 Q. Is this right: if you were ever in possession of</p> <p style="text-align: center;">Page 34</p>	<p>1 believe that that intrusion was warranted in the public 2 interest.</p> <p>3 I do believe strongly that this story had a public 4 interest, but if he'd come to me in advance, that would 5 have been the position that I'd have taken. Clearly, he 6 didn't come to me in advance.</p> <p>7 Q. Thank you.</p> <p>8 It appears that what happened is that over the 9 course of the three days between 27 May and 30 May, 10 Mr Foster was beavering away at publicly available 11 information. The code was cracked, as it were, about 12 lunchtime on 30 May, because if you go to page 14 of 13 JH4, Mr Foster to Mr Brett: 14 "Alastair, I cracked it. I can do the whole lot 15 from purely publicly accessible information." 16 Then Mr Brett comes back, top of the page: 17 "Brilliant -- that may be the golden bullet. Can 18 you set it out on paper?" 19 We see the golden bullet at page 15, where there was 20 reference to the brother's publicly accessible Facebook 21 page.</p> <p>22 A. Yes.</p> <p>23 Q. Then what happened, to go back to paragraph 11 of your 24 witness statement, Mr Chappell, the then managing 25 editor, learnt of the existence of the litigation on</p> <p style="text-align: center;">Page 36</p>

<p>1 3 June, and there's an email which evidences that.</p> <p>2 There was a conversation between Mr Chappell and</p> <p>3 Mr Brett on 4 June, and Mr Brett came to see Mr Chappell</p> <p>4 later in the day following the hearing.</p> <p>5 Mr Chappell believes it was at this meeting, in the</p> <p>6 afternoon of 4 June, after the hearing, therefore, in</p> <p>7 front of Mr Justice Eady, that he was first informed by</p> <p>8 Mr Brett that there was a concern that Mr Foster had</p> <p>9 gained unauthorised access to an email account and that</p> <p>10 Mr Chappell was first briefed by Mr Brett on the</p> <p>11 litigation.</p> <p>12 To be clear, then, as to the sequence of the</p> <p>13 litigation -- because this was going on, as it were, in</p> <p>14 the background, but some might say in the foreground --</p> <p>15 if we could go to JH3, Mr Harding --</p> <p>16 A. Yes -- and just to be clear, Mr Jay, you do understand</p> <p>17 the significance of that: that the way in which</p> <p>18 a newspaper works -- the senior management of the</p> <p>19 newspaper are the editor, the deputy editor and the</p> <p>20 managing editor. So the first time that anyone in the</p> <p>21 senior management of the paper becomes aware of the</p> <p>22 contents of this litigation or of the concern about the</p> <p>23 accessing of the email account is after Mr Justice Eady</p> <p>24 has heard this case.</p> <p>25 Q. But before Mr Justice Eady had delivered judgment in the</p> <p style="text-align: center;">Page 37</p>	<p>1 manager takes the case to a High Court without informing</p> <p>2 the editor, the deputy editor or the managing editor.</p> <p>3 LORD JUSTICE LEVESON: I must admit that caused me surprise</p> <p>4 Is that a systemic thing that needs to be addressed?</p> <p>5 A. I -- sorry, I only laugh because when you say it caused</p> <p>6 you surprise, you can imagine what it caused me.</p> <p>7 I don't believe it's systemic. I should say this:</p> <p>8 Mr Brett is an extremely distinguished and</p> <p>9 well-respected lawyer and had been the lawyer for the</p> <p>10 paper for many, many years, and I think on quite</p> <p>11 principled grounds believed that he wanted to take this</p> <p>12 case, that it was important to address the issue of</p> <p>13 creeping privacy injunctions and the issues that raises</p> <p>14 for press freedom, and I think in particular there were</p> <p>15 issues that he thought were important in terms of</p> <p>16 anonymity on the web. As you will see in one of his</p> <p>17 notes, he deeply apologises for the fact that he didn't</p> <p>18 raise it with us before he took it to court.</p> <p>19 LORD JUSTICE LEVESON: Yes, well, I'm very pleased that he's</p> <p>20 considering the ethical considerations that might apply</p> <p>21 to the press. The extent to which he gave thought to</p> <p>22 the ethical considerations relevant to the court is</p> <p>23 perhaps another matter.</p> <p>24 A. It is.</p> <p>25 MR JAY: We do need to touch on that, Mr Harding. Page 4 of</p> <p style="text-align: center;">Page 39</p>
<p>1 case, that's right, isn't it?</p> <p>2 A. Well, you know, for a long time I thought that was the</p> <p>3 case. I mean, for a long time, I say -- in the last</p> <p>4 couple of weeks. I actually got to read the full</p> <p>5 transcript of the case over the weekend, and actually</p> <p>6 what's quite striking is that Mr Justice Eady signals</p> <p>7 the fact that he is not going to support the injunction</p> <p>8 at the end of the hearing. I only mention that because</p> <p>9 there was so much miscommunication between the legal</p> <p>10 team and between the editorial management that that was</p> <p>11 not made clear, in fact hadn't been made clear to me</p> <p>12 until this weekend.</p> <p>13 Q. But we know that the formal judgment of Mr Justice Eady</p> <p>14 was provided in fact in draft, as is standard practice,</p> <p>15 on, I think, 12 June --</p> <p>16 A. Correct.</p> <p>17 Q. -- and then handed down on either the 15th or 16 June.</p> <p>18 We're going to come to that in due course, Mr Harding.</p> <p>19 A. Yes.</p> <p>20 Q. But to deal with the course of the litigation, which, as</p> <p>21 you say, was carrying on at a different level away from</p> <p>22 management -- and we understand how that happens in</p> <p>23 newspapers -- can you kindly go to page 4 of JH3.</p> <p>24 A. I'm sorry, Mr Jay, I hope you realise that's very, very</p> <p>25 unusual. I've never heard of a case where the legal</p> <p style="text-align: center;">Page 38</p>	<p>1 JH3 is an email contact with his opponent at Olswangs,</p> <p>2 Mr Dan Tench, whom it appears he's on first name terms</p> <p>3 with, so obviously they've done cases against each other</p> <p>4 in the past. He warns him that he's going to publish,</p> <p>5 so this is to give Mr Tench's client the chance to apply</p> <p>6 for an injunction, which is entirely appropriate.</p> <p>7 Page 5, Mr Tench says:</p> <p>8 "I am instructed to seek an injunction."</p> <p>9 Mr Tench gave a statement in support of his</p> <p>10 application, dated 28 May. If you go to page 13,</p> <p>11 please, we can see the start of the statement. At</p> <p>12 page 17, paragraph 20, he says at that point:</p> <p>13 "The claimant has no idea how Mr Foster identified</p> <p>14 him as the author of the blog."</p> <p>15 Do you see that sentence? The last sentence of</p> <p>16 paragraph 20.</p> <p>17 A. Yes.</p> <p>18 Q. There were then proceedings, no doubt conducted at very</p> <p>19 short notice and therefore everybody was in a bit of</p> <p>20 a rush, before Mr Justice Teare on 20 May.</p> <p>21 A. Yes.</p> <p>22 Q. The proceedings are transcribed at page 20 and</p> <p>23 following. The Times' counsel was Mr Barnes. What</p> <p>24 happened is that the proceedings were adjourned, but</p> <p>25 what Mr Barnes submitted to the court we can see at the</p> <p style="text-align: center;">Page 40</p>

10 (Pages 37 to 40)

<p>1 bottom of page 25 at letter H.  2 A. Yes.  3 Q. It says this:  4 "But this is where paragraph 4.2 of Mr Tomlinson's  5 skeleton argument, where he says that whoever informed  6 the Times of the claimant's identity did so in breach of  7 confidence, is something which gives us a considerable  8 amount of difficulty. We say it is an assumption at the  9 heart of the application that has been made that is not  10 realistic or related to the facts as they actually are.  11 In a moment, I will hand in a newspaper article and make  12 reference to some actual cases recorded on the blog and  13 some actual cases as reported in the newspaper."  14 Then, missing out some parts, and I paraphrase, he  15 was saying that it was a natural or the natural  16 investigative tendency to examine the blog,  17 cross-refer it to the stories that are out there and try  18 and narrow down and identify who the blogger is:  19 "There is nothing intrinsically wrong about that."  20 Of course, if that were true, that would, of course,  21 be the case. Then he says:  22 "My instructions, having discussed paragraph 4.2 of  23 Mr Tomlinson's argument in particular with my  24 instructing solicitors and the journalist, who is here,  25 are that the proposed coverage that will be given, which  Page 41</p>	<p>1 a journalist's view of the way in which this litigation  2 was conducted, but I think for me to account for the  3 words chosen by Mr Barnes or others -- I think those are  4 probably a matter for Mr Barnes and the legal  5 instructions he received.  6 Q. There's no criticism inherent in what I've said directed  7 to Mr Barnes. Mr Barnes acts on instructions. His  8 instructions were -- both from the journalist,  9 Mr Foster, and from Mr Brett, because no one else was  10 giving him instructions -- that this was a self-starting  11 journalistic endeavour. The word "self-starting" is  12 wholly misleading if we know that it wasn't  13 self-starting in that sense; it was self-starting by  14 ransacking someone's email account.  15 LORD JUSTICE LEVESON: Well, the point can be put another  16 way, Mr Harding. I don't think we need to spend time on  17 it. As I'm sure you're aware, counsel can't mislead the  18 court, and if this member of the bar had known how this  19 story had been obtained, it is inconceivable that he  20 would have said that to the judge.  21 A. Correct.  22 LORD JUSTICE LEVESON: Right. I think we can move on  23 because the way in which Mr White later puts it in his  24 skeleton argument is even more clear.  25 MR JAY: Yes. Page 46 now Mr Harding. This is Mr Tench  Page 43</p>
<p>1 will involve the disclosure of this individual's  2 identity, is derived [and then this] from  3 a self-starting journalistic endeavour upon the granting  4 of the Orwell Prize. It is a largely deductive  5 exercise, in the sense that the blogs have been examined  6 and contemporary newspaper reports have been examined."  7 That, sadly, was entirely misleading, wasn't it?  8 A. Mr Jay, as you know, I'm not a lawyer, and I've read now  9 all of these papers. I understand that at this stage  10 the issue being raised was about breach of confidence.  11 As you'll see when you get through the legal  12 correspondence, there are more specific allegations are  13 made by Mr Horton's lawyers about access to the email  14 account, and I'm sure we'll come to those and address  15 those.  16 Q. But what's being said here, in the context of breach of  17 confidence, I accept, and in the context of what has  18 been called the second stage, the weighing of the public  19 interest, is that this was a "self-starting journalistic  20 endeavour", "a largely deductive exercise". So  21 statements of fact were being put before the court which  22 were incorrect, weren't they?  23 A. I think that -- these were lawyers acting on behalf of  24 the Times and at the instruction of the company's legal  25 manager. I've now read them all, and I have  Page 42</p>	<p>1 writing to Mr Brett. Mr Tench is onto the issue. He  2 draws attention to what was said during the hearing --  3 this is about four lines down:  4 "The statement that our client was identified by  5 your journalist as the author of the blog 'largely by  6 a process of deduction' -- this suggests that our client  7 was so identified in part by a process other than  8 deduction, most obviously, we assume, by as source."  9 A. Mm.  10 Q. Then on the next page they ask for a statement from  11 Mr Foster verified by a statement of truth which sets  12 out various matters, and in paragraph 2, "confirm that  13 he did not, at any time, make unauthorised access into  14 any email account owned by our client".  15 Then he said for a number of reasons, I paraphrase,  16 a suspicion arises that he did.  17 A. Yes; correct.  18 Q. So the issue, as it were, was clearly joined at that  19 stage.  20 A. Correct.  21 Q. Mr Brett's reply, on 2 June at page 49 -- he provides  22 a copy in draft of Mr Foster's witness statement and he  23 says, exactly level with the lower hole punch:  24 "I therefore attach a copy of it, as it sets out  25 how, through a process of elimination and intelligent  Page 44</p>

11 (Pages 41 to 44)

<p>1 deduction, your client's identity can be worked out."  2 A. Mm-hm.  3 Q. Well, that wasn't an entirely honest statement of the  4 position, was it?  5 A. No, I don't believe it was.  6 Q. Then he deals in the last paragraph with a history of  7 making unauthorised access into email accounts by  8 Mr Foster. That's said to be a baseless allegation and  9 a misunderstanding of what happened at Oxford  10 University. We'll come back to that in a moment.  11 Mr Tench, at page 51 on 2 June, wants the issue  12 expressly addressed in Mr Foster's witness statement --  13 that's the last sentence -- and Mr Foster then did  14 produce a witness statement on 2 June at page 54, where  15 he does two things. At paragraph 9 at page 56, he says  16 at the top of the page:  17 "I will not reveal information about any  18 confidential sources."  19 The implication being that he might have had such  20 a confidential source. Then he goes through, in a very  21 thorough and elaborate way, the process of deduction or  22 almost forensic examination which he achieved by  23 scrutinising materials in the public domain. That's  24 what it amounts to, isn't it?  25 A. Mm.</p> <p style="text-align: center;">Page 45</p>	<p>1 makes some suggestions. You know, he throws all sorts  2 of straws in the wind: "Well, there were other people  3 who knew about this as well who you've not mentioned in  4 your statement", and that gets a corrective statement  5 back from Mr Horton, which is all rather disingenuous in  6 the light of what we now know.  7 A. Sir, you're right.  8 LORD JUSTICE LEVESON: Yes. Sorry, you were at page ...?  9 MR JAY: Starting at page 68, paragraph but it's  10 paragraph 14 at page 73. Mr Tench is really onto the  11 case because he's smelling a rat which, as it were, if  12 I may say so, gets smellier and smellier. Paragraph 14,  13 page 73, he says:  14 "The claimant is aware that Mr Foster has obtained  15 at least two further pieces of highly confidential  16 information concerning him in respect of which he's  17 given no explanation as to their source. That's the  18 mobile telephone number of the claimant and the identity  19 of the literary agent."  20 He makes the allegation express in paragraph 18:  21 "The claimant is particularly concerned that  22 information leading Mr Foster to reveal his identity may  23 have been obtained by illegitimate means, such as via  24 unauthorised access to the claimant's email account.  25 Can I move forward to page 83.</p> <p style="text-align: center;">Page 47</p>
<p>1 Q. And precisely how he did that I don't think it's  2 necessary to go into in any detail, but the point's  3 already been made that he had the answer before he  4 started.  5 A. And do you know whether he did or didn't have  6 a confidential source? I --  7 Q. I'm afraid that's not a question I can answer.  8 A. I don't know either. I'm just --  9 Q. His confidential source was in fact his own actions in  10 accessing the email. It was entirely disingenuous, with  11 respect.  12 A. Yeah.  13 Q. The Times would be the only persons who would know  14 whether he had a confidential source, but the inference  15 is that he didn't.  16 LORD JUSTICE LEVESON: Doesn't really matter, because, as  17 I say, it's not this particular incident that  18 necessarily concerns me.  19 A. Right.  20 LORD JUSTICE LEVESON: It's how it's dealt with across the  21 system.  22 A. Okay.  23 MR JAY: The next piece of evidence, page 68, second  24 statement of Mr Tench of 3 June --  25 LORD JUSTICE LEVESON: Just before passing that, he also</p> <p style="text-align: center;">Page 46</p>	<p>1 LORD JUSTICE LEVESON: He also explains that there's some  2 reason for that suspicion, because when he tried to log  3 into his email account, his password wasn't accepted,  4 suggesting that somebody had been into the account and  5 changed it, so he had to reset the password.  6 A. Correct.  7 LORD JUSTICE LEVESON: Yes.  8 MR JAY: The claimant's skeleton argument starts at page 83.  9 This is for the return date of the hearing now before  10 Mr Justice Eady, the application for an injunction.  11 At paragraph 4.3 at page 86, the point is made on  12 behalf of the claimant:  13 "It is noteworthy that Mr Foster does not (a)  14 confirm that he's not accessed the email account used at  15 the blog, (b) explain how he found the claimant's mobile  16 telephone number and the details of the identity of the  17 claimant's literary agent."  18 The Times' skeleton argument starts at page 94.  19 I think I can move straight to page 96 under the heading  20 "Breach of confidence". It's the last sentence in  21 paragraph 7. The assertion is made, again on  22 instructions:  23 "Mr Foster was able to establish the claimant's  24 identity using publicly available materials, patience  25 and simple deduction."</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 Again, that, to use a neutral term, is not correct, 2 is it? 3 A. No. 4 Q. That was the material which was placed before the court. 5 The way it was advanced -- 6 LORD JUSTICE LEVESON: In order just to be clear, that 7 document is signed by Mr White and also the same 8 barrister who appeared on the interlocutory application, 9 so it's quite clear that if the information had been 10 different to that which Mr Barnes originally had, that 11 would have come out at this time, and you make it 12 abundantly clear in your statement that Mr White 13 certainly didn't know what you now know. 14 A. Correct. 15 MR JAY: In the light of this evidence, the way Mr Tomlinson 16 put the case to Mr Justice Eady on behalf of his client, 17 the claimant -- page 133, just after letter E. 18 A. Yes. 19 Q. "We are concerned, as you will see from the evidence, 20 that someone has hacked into my client's email account. 21 Be that as it may, the position we accept from today, 22 hearing this case now, you can assume that it's more 23 likely than not, on the evidence that's before the court 24 today, that the identity was discovered by detective 25 work and not by, as it were, conventional breaches of Page 49</p>	<p>1 that he can't prove that the email account was hacked. 2 He makes that clear to the judge because he knows full 3 well that that's the conclusion Mr Justice Eady is going 4 to make anyway, so he makes a realistic concession, and 5 then decides to argue the case on the basis he's forced 6 to accept. Don't you see that? 7 A. No, I think -- I'm not trying to defend it. I'm 8 actually trying to explain that actually I'm as shocked 9 as you to see that Mr Horton's lawyers raised, as far as 10 I can see, on six occasions, specific concerns about 11 accessing an email account, including in front of 12 Mr Justice Eady. 13 Q. Thank you. The conclusion of the judge -- and the 14 judgment was handed down on 16 June at page 172 -- 15 LORD JUSTICE LEVESON: Hang on, just before we go there -- 16 MR JAY: Sorry. 17 LORD JUSTICE LEVESON: At the end of the hearing, the judge 18 said: 19 "I'm not going to grant the injunction. I'll give 20 my reasons in writing at a later date." 21 So we may need to cover the interim period. 22 He says he's not persuaded by the claimant's 23 argument but he's continuing it on a temporary basis 24 until the judgment, obviously so as to protect the 25 possibility of an appeal. Page 51</p>
<p>1 confidence." 2 You note that last phrase, "conventional breaches of 3 confidence". 4 "We are content for you to proceed on that basis." 5 That was a realistic concession by Mr Tomlinson, 6 because notwithstanding the high level of suspicion his 7 client may have posed, it probably was fair to say, on 8 the evidence available, more likely than not, that it 9 was obtained by detective work rather than by covert and 10 illegal means. Do you accept that? 11 A. All I'd say, Mr Jay, is -- I am coming to this nearly as 12 fresh as you -- it was striking to me that Mr Tomlinson 13 made a point of raising in front of Mr Justice Eady the 14 concern -- this, in fact, is the first time in this file 15 that someone uses the phrase "has hacked into my 16 client's email account" and raises expressly the 17 concern -- and I say this in no way to improve the 18 position of those legal instructions or the legal 19 position of the Times -- but expressly raises the 20 concern that Mr Foster never expressly says, "This was 21 the only way I did it; I did not rely on any other 22 confidential sources." That's quite striking to me. 23 Q. I'm not sure I'm quite following the point. The way 24 I read this is that leading counsel for the claimant, 25 assessing the available evidence, realistically accepts Page 50</p>	<p>1 So it's still to play for. You've, as it were, won 2 provisionally, but of course, if something dramatic 3 happens in the meantime, of course the judge isn't bound 4 by that because he's continued the injunction on an 5 interim basis. 6 A. Mm. 7 LORD JUSTICE LEVESON: Or the Court of Appeal aren't bound 8 by it. 9 MR JAY: No. 10 LORD JUSTICE LEVESON: In other words, the position is still 11 as it was. 12 A. Right. 13 MR JAY: I'm going to come back to that issue because it is 14 or may be relevant. 15 I don't think it's necessary to analyse 16 Mr Justice Eady's reasoning. One can just alight on his 17 conclusion, which is paragraph 33. This is quite 18 a sophisticated legal area. It's not one in which 19 I have 100 per cent confidence of understanding all the 20 principles, but what he says is: 21 "I conclude that he [that's the claimant] fails at 22 stage one, in the sense that the information does not 23 have about it the necessary quality of confidence as 24 contemplated by Megarry VC [in a particular case] ... 25 nor does it qualify as information in respect of which Page 52</p>

<p>1 the claimant has a reasonable expectation of privacy --  2 essentially because blogging is a public activity.  3 Further, even if I were long about this, I consider that  4 any such right of privacy on the claimant's part would  5 be likely to be outweighed at trial by a countervailing  6 public interest in revealing that a particular police  7 officer has been making these communications."  8 It might be said that the Times would have won  9 anyway, even had Mr Justice Eady known of the manner in  10 which the information was first obtained, because the  11 claim failed at stage 1. I'm not saying that that is  12 the ineluctable conclusion but it's certainly a possible  13 conclusion, because it's only at stage 2, when you're  14 balancing the public interest against other factors,  15 that the circumstances in which the information has been  16 obtained will be directly relevant. I don't put that  17 forward as writ in stone, but I do put that forward as  18 a possible interpretation of the law in the light of  19 that particular conclusion.  20 Can I take the story forward and then go perhaps  21 back in time to 4 June, because we left it, as it were,  22 at paragraph 11, Mr Harding, with the conversation  23 between Mr Chappell and Mr Brett after the hearing.  24 A. Can I just make one point, Mr Jay, if I can?  25 Q. Certainly.</p> <p style="text-align: center;">Page 53</p>	<p>1 Mr Brett took the decision to resist the injunction.  2 You say:  3 "I don't know exactly what consideration Mr Brett  4 gave to the fact that Mr Foster had gained unauthorised  5 access to an email account, but I understand that  6 Mr Brett told Linklaters on 2 February of this year that  7 he decided not to inform leading counsel for the Times,  8 Antony White Queen's Counsel, or the court about the  9 issue because he took the view that this information  10 provided to him by Mr Foster was confidential and  11 privileged, that it would incriminate Mr Foster, and  12 that in any event Mr Foster had been able to identify  13 Mr Horton through legitimate means."  14 There are a number of matters there to note. It's  15 probably not necessary to comment on them. They speak  16 for themselves.  17 I would like to take the story forward from 4 June  18 and go back, please, to JH4, page 23. This is an  19 important email.  20 A. Yes.  21 LORD JUSTICE LEVESON: This is the evening of the hearing  22 before Mr Justice Eady.  23 A. Correct. Sorry, which page are you on?  24 MR JAY: It's page 23 of JH4.  25 A. Yes.</p> <p style="text-align: center;">Page 55</p>
<p>1 A. We've gone through a whole exchange of legal  2 correspondence and legal arguments, which, as I said,  3 I've read in the past few days. I hope you appreciate  4 that I'm not a lawyer, and, as you'll see in the witness  5 statement, what I try to do is reflect the thinking of  6 Mr Brett, who was the company's legal manager, in his  7 decisions and in the instructions that he gave.  8 I can make a journalist's observation on the way in  9 which this was conducted, and it does seem to me very  10 clear that Mr Horton's lawyers raised time and again the  11 issue of their concern about this email access, that  12 Mr Brett tried to push them off with this claim that  13 that was "a baseless allegation", and then on every  14 instance that it was raised after that, there was no  15 attempt to answer it.  16 As I say, I'm not a lawyer. I am responsible for  17 what happens in the newsroom of the Times, I'm not  18 responsible for what happens in the courtroom, but I do  19 feel that while the company handles legal affairs,  20 somebody owes Mr Justice Eady and Mr Horton an apology,  21 and I think you'll have seen I've written to  22 Mr Justice Eady to apologise for the fact that this was  23 not disclosed to the court.  24 Q. In paragraph 20 of your witness statement, if I take  25 this slightly out of my intended sequence, you say</p> <p style="text-align: center;">Page 54</p>	<p>1 Q. You were copied into this email. We can see the time.  2 But you don't recall having read it at the time?  3 A. I don't recall having read it. I don't think I would  4 have read it. Just to remind you, it was -- the evening  5 of the hearing was also the local election night, and as  6 you remember -- you may or may not remember -- on 4 June  7 2009, there was an effort under way to oust  8 Gordon Brown. James Purnell was submitting a letter of  9 resignation from the cabinet and there was a question  10 about whether or not he was going to pull down the  11 government. That was where my attention was.  12 Q. We can see the size and detail of the email. Is it your  13 evidence that you don't think you read it even after  14 4 June, Mr Harding?  15 A. No, I don't think I read it until the last week or ten  16 days.  17 Q. Okay. I think it's important to understand what  18 Mr Brett was telling Mr Chappell, only because you had  19 a conversation with Mr Chappell subsequently and  20 therefore we need to know what Mr Chappell's state of  21 knowledge and mind was.  22 A. Yes.  23 Q. So can we just take a little bit of care with this  24 email.  25 A. Of course.</p> <p style="text-align: center;">Page 56</p>

14 (Pages 53 to 56)

<p>1 Q. "David, you asked me to do you a memo on NightJack and 2 events to date. 3 "I first saw Patrick Foster on or about 19 May when 4 he told me he'd been able to identify real live cases 5 that an anonymous police blogger had been writing about. 6 Patrick felt this was seriously off side and probably 7 a breach of the officer's duty of confidence to the 8 force. He therefore wanted to identify the guy and 9 publish his name in the public interest. He then said 10 he had gained access to the blogger's email account and 11 got his name." 12 Well, that's crystal clear, isn't it? 13 A. It is, yes. 14 Q. "This raised immediate alarm bells with me but I was 15 unaware of the most recent law governing email 16 accounts." 17 Then he said he phoned a barrister's chambers, got 18 to speak to someone who was a very bright junior 19 barrister and said that -- I'm paraphrasing now -- it 20 looks like a breach of Section 55 but there's always 21 a public interest defence. 22 A. Yes. 23 Q. Which we know about. Pausing there, although this is a 24 point of law, really, under the Computer Misuse Act, 25 which this was also a breach of, there isn't a public Page 57</p>	<p>1 and I move on. 2 Five lines down from the top of the next page: 3 "On Monday of this week, Olswang wrote to us saying 4 (a) that Patrick had a history of accessing email 5 accounts and pointing us to an incident at Oxford where 6 he'd been temporary rusticated for accessing someone 7 else's email account without authority, and (b) that 8 their client's email had been hacked into. Looking at 9 the old Oxford cuttings about Patrick's brush with the 10 proctors, I became aware of the possibility that 11 Patrick's access to Horton's email account could 12 constitute a breach of section 1 of the Computer Misuse 13 Act." 14 Then he says there's no public interest defence. 15 Then in summary, halfway down: 16 "Patrick has always believed that his investigation 17 of NightJack was in the public interest. When he came 18 to me to say that he had found out that NightJack was 19 Richard Horton and he had also obtained access to his 20 email account, I made it very clear that this was 21 disastrous, as he should not have done it." 22 Then he refers to the then focus on Section 55. 23 So that was Mr Chappell's state of mind. He was 24 clearly told that Mr Horton had obtained the information 25 by illegal email hacking, hadn't he? Page 59</p>
<p>1 interest defence. That's made clear subsequently. 2 A. No. 3 Q. The next paragraph: 4 "After this conversation, I told Patrick: 'Never 5 ever think of doing what you have done again.' I said 6 he might just have a public interest defence if anyone 7 ever found out how stupid he'd been. He apologised and 8 promised not to do it again. Further, he said he would 9 set about establishing Horton's identity without 10 reference to the email account. I did though say he 11 would have to put it to Richard Horton that he was 12 NightJack." 13 We know that occurred on 27 May, I think, and 14 then -- I paraphrase -- over the following days, he 15 continued to investigate NightJack. He describes the 16 process of deduction. 17 At the bottom of the page: 18 "Last Thursday afternoon, our barrister told the 19 court that through a process of deduction and 20 elimination, Patrick could identify Horton as NightJack, 21 but it looked as though we would lose the application 22 because Horton's silk was convincing the judge that he 23 was entitled to have the information protected by the 24 law of privacy and confidence." 25 So he asked for an adjournment -- I paraphrase -- Page 58</p>	<p>1 LORD JUSTICE LEVESON: You'd better read the middle of the 2 bottom paragraph. 3 MR JAY: Certainly. 4 LORD JUSTICE LEVESON: Which is: 5 "Given my own failure to spot what could be a breach 6 of section 1 of the Computer Misuse Act, I am not in 7 a position to advise sensibly in this case, but I would 8 suggest that Patrick is given a formal warning that if 9 he ever accesses anyone's computer ever again without 10 authority, whether it's in the public interest or not, 11 he will be sacked. You might add that the only reason 12 he has not been sacked now is because he was told he 13 might have a public interest defence if he was pursued 14 under the DPA." 15 So that's a false premise as well. Anyway. 16 MR JAY: So the following day Mr Harding -- and now we're 17 back to paragraph 13 of your statement. 18 A. Yes. 19 Q. -- you say: 20 "I personally first came to hear about the matter 21 the following day, 5 June 2009, when Mr Chappell raised 22 the matter with me in a meeting. In this meeting, 23 Mr Chappell told me about the story, and that there was 24 a concern that Mr Foster had accessed Mr Horton's email 25 account." Page 60</p>

<p>1 That puts it, arguably, rather low. It was more 2 than a concern. Mr Foster told Mr Brett that that's 3 what he'd done, that he'd accessed the blogger's email 4 account; isn't that right? 5 A. Yes, Mr Brett had said that in that email. 6 Q. Yes. 7 LORD JUSTICE LEVESON: And Mr Chappell had acknowledged it, 8 because on page 25 of JH4, he says: 9 "Alastair, I've a couple of quick questions on this. 10 When you get in, can we have a brief chat, please?" 11 So he's clearly studied this email. 12 A. Mr Chappell has, yes. 13 LORD JUSTICE LEVESON: Mr Chappell. 14 A. Yes. 15 MR JAY: It's really the next sentence which I need to ask 16 you about in paragraph 13: 17 "At that time, it was not clear to Mr Chappell ... 18 [I miss out "or to me"] exactly what Mr Foster had 19 done." 20 But it was clear, wasn't it? 21 A. Just to put it in some context, Mr Jay, as I mentioned 22 to you, that following day there was a cabinet 23 reshuffle. So there was quite an intense political 24 crisis, but for me personally, the biggest shock was 25 that the Times had taken a case to the High Court and</p> <p style="text-align: center;">Page 61</p>	<p>1 know. I would have taken the view immediately that this 2 was not right, this was not the way in which we pursued 3 stories and certainly we had no business doing it 4 without being consulted in advance. Exactly the nature 5 of the conversation, I don't know. I just can see from 6 the follow-up emails that we decided that we were 7 immediately going to take disciplinary action. 8 Q. So you must have known enough then to know the gravamen 9 of the case against Mr Foster, namely that he'd 10 unlawfully accessed an email account? That must be 11 right, Mr Harding, mustn't it? 12 A. Well, as you know, one of the issues I've had is 13 I didn't know exactly what he had done. The reason for 14 this -- and I will keep going back to it -- is the 15 issues in this case were all coming to me at the same 16 time, ie why were we seeking to identify an anonymous 17 blogger, what was the public interest in that argument, 18 why had a case been taken to the High Court without me 19 being informed, and where in this process did, you know, 20 Patrick Foster's -- at that stage, I didn't know whether 21 it was an attempt to access an email account or 22 successful attempt to access an email account -- fit in 23 the investigations? All of those things came at the 24 same time. 25 Q. Then the sentence we've just been scrutinising:</p> <p style="text-align: center;">Page 63</p>
<p>1 I was not aware of this fact. So I think it may have 2 been the case that in the short conversation that we 3 had, the first focus my attention was: what case, on 4 what grounds, why and why wasn't I informed? And we 5 probably didn't drill down probably into exactly what 6 Mr Foster had done. 7 Q. But the key message from the email we've been looking at 8 was that Mr Foster had gained access to the blogger's 9 email account. That must have been something that 10 Mr Chappell -- it must have resounded with him and it 11 must have been something, surely, which he'd 12 communicated to you, Mr Harding; isn't that right? 13 A. I can't recall the exact contents of that conversation. 14 There's a reference to the meeting in my diary and 15 there's a reference to the meeting having happened in 16 a follow-up email, but I don't want to speculate on what 17 was in that conversation. 18 Q. You do say in your statement: 19 "The suggestion that he had accessed someone's email 20 account was as matter of great concern to both of us." 21 A. Yes. 22 Q. So the message of unlawful accessing of an email 23 account, at least that message was transmitted to you, 24 wasn't it, by Mr Chappell? 25 A. Well, the issue of whether or not it was lawful, I don't</p> <p style="text-align: center;">Page 62</p>	<p>1 "The suggestion that he had accessed someone's email 2 account was a matter of concern to both of us". 3 So your state of mind on 5 June was clearly someone 4 was telling you that Mr Foster had accessed someone's 5 email account, wasn't it? 6 A. That is what is -- as I say, I can't recall exactly what 7 was said in that meeting. 8 Q. All right. Then you say: 9 "It was clear that we had to deal with Mr Foster's 10 behaviour." 11 What behaviour were you referring to there if it 12 wasn't the unlawful accessing of the email account? 13 A. No, no, it was that behaviour. It was the -- but as 14 I said, the issue here, Mr Jay, is that I didn't know 15 exactly what he had done. I didn't know: had he 16 accessed the account? Was it the blog account? Was it 17 an email account? It just seemed to me to be a highly 18 intrusive piece of reporting without prior approval, and 19 I put in that -- and I'm giving it to you much more 20 clearly today than I appreciated at the time, and you're 21 asking me to -- and I realise -- I understand you're 22 pressing me to say what was the nature of the 23 conversation on 5 June 2009. I can't recall it exactly. 24 Q. Yes. I can understand, Mr Harding, there were two 25 levels of background noise going on. First of all,</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)



<p>1 there was the background noise surrounding the political 2 situation, which was occupying you. Secondly, there was 3 the background noise that you were angry that this had 4 been going on without your knowledge, but if we try and 5 strip that noise away, the basic point was a simple one: 6 one of your reporters had accessed illegally an email 7 account, and that was really the basis on which the 8 story was going to be published; isn't that --</p> <p>9 A. Mr Jay, I have to own my responsibility and my failure 10 here. As I say in the statement, I can see now that we 11 paid insufficient attention to this matter at the time. 12 We did. We paid it insufficient attention.</p> <p>13 Q. Finally on paragraph 13, you say: 14 "We agreed that we would await Mr Justice Eady's 15 judgments before doing that." 16 The "that" is dealing with Mr Foster's behaviour in 17 the sentence we've been looking at?</p> <p>18 A. Yes.</p> <p>19 Q. Don't you think, though, that given that Mr Justice Eady 20 had not handed down his judgment, it might be a sensible 21 idea to obtain legal advice, and if Mr Brett no longer 22 could give you that independent advice, as he was 23 suggesting in an email, get legal advice as to whether 24 you should go back to Mr Justice Eady and tell him what 25 the true facts were?</p> <p style="text-align: center;">Page 65</p>	<p>1 When we had to weigh up, which we did ten days 2 later, a decision about publishing, then again we had 3 a whole bunch of other issues that we had to weigh, and 4 in that we had to figure out what attention we would pay 5 to this issue.</p> <p>6 Q. Of course, it might be said on your behalf that you did 7 not know precisely on what basis the Times case had been 8 put to Mr Justice Eady?</p> <p>9 A. Much worse than that, Mr Jay. I had no idea that the 10 case had been brought to court. I didn't know what the 11 legal correspondence was, I didn't know who had been 12 instructed, I didn't know what the instructions were, 13 I didn't know the subject matter in the case. So all of 14 this is after the fact.</p> <p>15 Q. It would be obvious to a lawyer -- but you're not 16 a lawyer -- that Mr Justice Eady could not have been 17 told that the email account had been unlawfully hacked 18 into, because had he been told that, you would have got 19 to know about it because he might have exploded, but 20 that degree of ex post facto rationalisation, obvious to 21 a lawyer, might not be obvious to everybody.</p> <p>22 A. Right.</p> <p>23 Q. May I move on to what happened approximate ten days 24 later, because the judgment was provided in draft, as 25 I've said and you say at paragraph 23, and then there</p> <p style="text-align: center;">Page 67</p>
<p>1 A. I'm sorry, Mr Jay, you're asking me to make judgments on 2 things I didn't know about. I didn't know about this 3 email. I didn't know about the advice that Mr Brett was 4 giving. How would I be able to go back and ask for 5 different advice when I didn't know the advice that was 6 being given?</p> <p>7 Q. But you did know that the email account had been hacked 8 into. We're agreed about that, aren't we?</p> <p>9 A. Sorry, I keep trying to be clear. You're saying to me: 10 "If we could strip away the fact that there was 11 a political crisis going on, and if you could strip away 12 the fact that you had not been informed of this 13 litigation at all, if you could take those things out of 14 the equation, would you not then have appreciated ed 15 fully?"</p> <p>16 But the reality is that wasn't the situation that 17 I was confronted with, and as I've tried to say to you, 18 I don't recall exactly what was said. What I have tried 19 to acknowledge is that when this was brought to me, when 20 it was clear that there was a problem of behaviour and 21 not even being clear exactly what the problem was, we 22 dealt with it. We took really swift action. 23 Mr Chappell was informed. Mr Chappell came to tell me. 24 We immediately decided that disciplinary action would be 25 taken.</p> <p style="text-align: center;">Page 66</p>	<p>1 was a meeting on 15 June to discuss the issue of 2 publication. The best route into that is JH4, pages 47 3 and 48.</p> <p>4 A. Okay.</p> <p>5 Q. The first email at page 47 is the one at the bottom of 6 the page, timed in the morning of 14 June. This is 7 Mr Chappell to Mr Blackmore, where you're beginning to 8 give consideration, or your paper is, to the public 9 interest considerations: 10 "There are three things to consider: 11 "(1) What is the editorial value of this story? 12 "(2) Given there is a significant legal precedent 13 in this, we'll want to run something. Given the trouble 14 it's caused, are we now cutting off our own nose to see 15 spite our faces if we decide the story isn't that 16 interesting? Are we now stuck in a position of having 17 to run something because of the legal processes?"</p> <p>18 Then the third issue is: 19 "What do we do about Patrick?"</p> <p>20 Then the next email -- I am not sure we're 21 necessarily concerned with --</p> <p>22 A. I should say that pretty much reflected the nature of 23 the conversation, I think, the following day on Monday, 24 15 June.</p> <p>25 Q. Am I right that by this point you were aware that</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 Mr Foster had hacked into the email in order to gain the 2 identity of NightJack? 3 A. No. I keep on trying to make it point to you, Mr Jay. 4 I was not aware of exactly what he had done. I was 5 aware that we had a concern about what he had done, but 6 I was not aware of exactly what he had done, and that's 7 remained the case, to be honest, until we've got all of 8 these emails and all of this documentation in front of 9 me in the last couple of weeks. 10 Q. I think you were -- or may I ask the question less 11 directly: were you involved in the decision whether to 12 publish this story in the public interest? 13 A. Yes. 14 Q. How did you feel you could reach that decision without 15 exploring further into the circumstances in which the 16 story had been initially obtained? 17 A. So again, we'll try to go back to June 15, this is, 18 2009, and just again to give some context, this is in 19 the aftermath of the Iranian elections. We had 20 a reporter in Tehran and, do you remember, it turned 21 quite violent. So this was what was occupying us on 22 that day. 23 We had a meeting, as I remember, to discuss this 24 issue. The first and biggest one was: what was the 25 public interest argument? And of course, what was very</p> <p style="text-align: center;">Page 69</p>	<p>1 bringing vexatious lawsuits to the High Court if we 2 don't honour that judgment? 3 Third, there was a question which was: the reporting 4 had already led to Mr Horton's identification within the 5 Lancashire Constabulary, and fourth, we believed we had 6 a behavioural problem with one of our reporters. We 7 were going to have to address that. 8 The way it had been presented to me -- and that's 9 obviously different with hindsight but the way it had 10 been presented to me was there was a concern about 11 Mr Foster's behaviour but that he had identified him 12 through entirely legitimate means. On that basis and in 13 the light of all of those four things, I took the 14 decision to publish. 15 Q. If the focus of your deliberations was the public 16 interest, wasn't it all the more important to weigh into 17 the balance the circumstances in which the information 18 had been first obtained? 19 A. I think what I've tried to explain was the arguments of 20 the public interest, if you like, the balance of the 21 arguments was not about public interest versus privacy; 22 it was: was this in the public interest? Ie, public 23 interest versus rights of anonymity on the web and the 24 nature of the blogosphere. That was the nature of the 25 conversation we had.</p> <p style="text-align: center;">Page 71</p>
<p>1 frustrating was that's exactly the conversation we 2 should have had in advance of going to the High Court. 3 We had it after the fact and after the fact that 4 Mr Eady's judgment was being handed down, but it was an 5 important argument that we had to address, because on 6 the one hand, some people said, "Why are we trying to 7 identify someone who is essentially a citizen journalist 8 who is an anonymous blogger? Surely, if you like, he's 9 one of us?" 10 And on the other side there was a question which 11 was: here is a police officer who appears to be in 12 breach of his police duties and also there is a real 13 question about this kind of commentary made anonymously 14 on the Internet, the whole issue of anonymity on the 15 web, and having listened to that debate, I took the view 16 that this was -- and still believe that this was firmly 17 in the public interest. This was what dominated that 18 conversation. 19 The second issue was: what do we do about the fact 20 that this case has been taken without our knowledge to 21 the High Court? What do we do if we've taken up the 22 time of the High Court, Mr Justice Eady has ruled that 23 this is in the public interest, we are thereby enabling 24 everyone to publish the identity of NightJack, but more 25 importantly, will the Times not then get known for</p> <p style="text-align: center;">Page 70</p>	<p>1 Q. That's raising the debate to quite a high level of 2 abstraction, because ordinarily, if you're considering 3 the public interest, you would want to know the 4 circumstances in which the information was obtained. If 5 it was obtained by traditional methods of subterfuge 6 which weren't particularly intrusive, that would weigh 7 quite lightly as a countervailing factor in the public 8 interest but if it was obtained illegally, then surely 9 the public interest balance comes down -- or arguably 10 comes down in a rather different place, doesn't it? 11 A. No, I appreciate what you're saying, but what I'm trying 12 to explain is that -- actually, no, this was not a high 13 level of abstraction for us. For all journalists, we 14 are really trying to understand the nature of what we do 15 and the nature of information on the Internet, and how 16 we interact with that kind of information on the web. 17 So actually the interaction between a newspaper and the 18 blogosphere was a very real issue. 19 In this case, we took the view -- I took the view -- 20 that this was a police officer in breach of his police 21 duties. There were questions about what the information 22 that he was putting into the public domain would do. 23 That was the focus of our thinking. 24 Q. One possible insight or evidence, rather, into the 25 subject matter of your discussions may be gleaned from</p> <p style="text-align: center;">Page 72</p>

<p>1 page 49 of JH4, which is an email from Mr Chappell to 2 Mr Brett on 14 June in advance of a meeting which 3 I think was going to take place with you the following 4 day on the 15 June. Do I have this bit right? 5 A. Sorry, which page are you on? 6 Q. Page 49 of JH4. 7 A. Yes. 8 Q. The lower email. The evening of 14 June: 9 "Good evening, Alastair. Keith and I have been 10 discussing this from the editorial standpoint and we're 11 in broad agreement as to how to proceed tomorrow." 12 The way I read that is that there was a discussion 13 slightly lower down the management and editorial tree. 14 They were going to take these issues to you the 15 following morning, and what we are about to see may form 16 part of the basis of the editorial discussions which you 17 were going to participate in. Do you follow that? 18 A. Yes. 19 Q. Can we go to the second number 2, because there are two 20 bullet points to -- 21 A. Yes. 22 Q. This point is made: 23 "If we publish a piece by Patrick saying how he 24 pieced together the identity (for which Eady praises 25 him!) what happens if subsequently it is shown that he Page 73</p>	<p>1 story", I would have said no. If Mr Brett had come to 2 me and said, "Mr Foster has done this; can he continue 3 to pursue the story?", I would have said no. If 4 Mr Brett had come to me and said, "Do you think we 5 should go to the High Court, given the circumstances of 6 this story?", I would have said no. 7 The problem was they came to me all after the fact 8 and I had to make a decision, which was: what is the 9 public interest in this story? And I believe it was 10 strongly in the public interest. What are the 11 consequences of having been to the High Court? What are 12 the consequences of the fact that this had been raised 13 with Lancashire Constabulary and how do you fit in the 14 issue of Patrick Foster's behaviour within that? And 15 all I can tell you is that the judgement I came to was 16 that I decided to publish. 17 Q. Can I ask you whether the formal warning letter that was 18 written to Mr Foster by the managing editor at page 59 19 of JH4 -- 20 A. Yes, yes. 21 Q. -- whether the penultimate paragraph at page 60 22 correctly represents the position. The point is made 23 there: 24 "By your actions, the Times was placed in a position 25 where it had to run the story, despite misgivings of Page 75</p>
<p>1 had accessed the files? What are the ramifications for 2 him, you and the editor -- does our decision to publish, 3 knowing that there had been a misdemeanour, indicate 4 complicity and therefore real embarrassment or does 5 Eady's judgment get us off the hook?" 6 Was that point made to you the following morning? 7 A. I cannot -- I cannot remember the exact nature of 8 everything that everybody said in that room. What I've 9 tried to reflect to you is what dominated our thinking, 10 what informed the decision to publish. 11 Q. But the fact there there's been a misdemeanour was 12 obviously exercising Mr Chappell. Of course, it was 13 exercising Mr Brett for other reasons, or perhaps it 14 ought to be have been. 15 A. Yes. 16 Q. It's a bit strange, it might be commented, that the 17 existence of the misdemeanour was not brought to your 18 attention, as the editor having to make the final 19 decision. Is that right? 20 A. Sorry, I keep on trying to make the same point, which 21 is -- 22 Q. Okay. 23 A. If -- if it had been the case that Mr Foster had brought 24 this to me and said, "I'd like to get access to 25 Mr Horton's email account for the purposes of this Page 74</p>	<p>1 senior editorial staff about its merits. That is not 2 a proper basis on which decisions should be made." 3 A. I know you're going to find this ironic, but we felt 4 that, having taken up the court's time and 5 Mr Justice Eady having found in our favour, we had to, 6 amongst other things, respect his judgment. We felt 7 that we had little choice but to publish. 8 Q. There is an irony there, I think, Mr Harding, as you 9 recognise. 10 At no stage, is this right, did anybody suggest to 11 you that these matters ought to be brought to the 12 attention of Mr Justice Eady? 13 A. No. As I said, our statement -- Mr Brett, the then 14 legal manager, as I understand it, did not believe and 15 still does not believe that the court was misled. 16 When I read these documents, when I went through 17 them, I felt that information had not been disclosed to 18 the judge and I felt that it was right that he should 19 get an apology and I have written to him to apologise. 20 LORD JUSTICE LEVESON: The other person you could have 21 asked, I suppose, was Mr White. Not you, but somebody. 22 He was the silk, the leading counsel you were 23 instructing. 24 A. Sir, I don't mean to be -- who would have asked him? 25 Mr Brett had instructed Mr White. Mr Brett had not Page 76</p>

<p>1 informed Mr White that this had happened.  2 LORD JUSTICE LEVESON: Yes.  3 A. We were all --  4 LORD JUSTICE LEVESON: But then you had to make some  5 decisions, didn't you?  6 A. Mm.  7 LORD JUSTICE LEVESON: And you were bothered about it, and  8 indeed you're discussing whether it might have, in  9 fairness to Mr Justice Eady's judgment in favour of the  10 Times, been only appropriate to publish.  11 A. Yes.  12 LORD JUSTICE LEVESON: But the person who could have  13 provided you with a window on it --  14 A. Yes.  15 LORD JUSTICE LEVESON: -- was the person who had fought it  16 for you.  17 A. I didn't know that Mr White had fought it for me.  18 LORD JUSTICE LEVESON: I know, I know, I know.  19 A. When you look back at all of this, sir -- I really hope  20 you understand -- it's terrible. I really hope you  21 appreciate that. I know that as keenly as you do. But  22 I also hope you appreciate that the reason we're here  23 and the reason we're discussing this is that we take  24 this Inquiry very seriously, and as a result -- and  25 every time we've learnt new things about this, we've</p> <p style="text-align: center;">Page 77</p>	<p>1 LORD JUSTICE LEVESON: This was -- I think I've got this.  2 This was 19 January.  3 A. Yes.  4 LORD JUSTICE LEVESON: You've put this out and you've  5 explained to me at some length about how, in the last  6 couple of weeks, you've pieced all this together.  7 A. Yes.  8 LORD JUSTICE LEVESON: Which required you to extract emails  9 and the rest of it.  10 A. Yes, and what happened, of course, is that we -- I'd  11 brought this issue into the public domain in my original  12 witness statement. When I came here two or three weeks  13 ago, we didn't discuss it. It's then in the public  14 domain. I then ask our media reporter to report the  15 issue out. He comes out and what I'd personal been  16 concerned about but didn't have personal knowledge of he  17 confirms. Mr Foster certainly gained unauthorised  18 access into the email account.  19 LORD JUSTICE LEVESON: Were you not aware of the evidence  20 that -- I think the gentleman's name is David Allen  21 Green -- had given to the Inquiry?  22 A. This is before that, I think.  23 LORD JUSTICE LEVESON: I see, all right.  24 A. So we then -- as is often the case with these things --  25 what happens is you report a story, you seek to answer</p> <p style="text-align: center;">Page 79</p>
<p>1 brought this to your attention, and that's the reason  2 that we're addressing these issues now.  3 LORD JUSTICE LEVESON: That is, of course, very important.  4 MR JAY: A few other points, Mr Harding. You've drawn to  5 our attention -- indeed, I read it at the time -- the  6 piece in the Times on 19 January of this year, which is  7 the second page of JH1.  8 A. Yes.  9 Q. I've been asked by someone else to put this to you.  10 A. Where are we?  11 Q. Last page of JH1.  12 A. Yes. Yes, yes.  13 Q. It's a piece by your media editor. The second column,  14 four lines from the bottom:  15 "The role the hacking played in Mr Foster's  16 investigation remains unclear."  17 A. Yes.  18 Q. "Mr Foster identified Mr Horton using a legitimate  19 process of deduction based on sources and information  20 publicly available on the Internet."  21 Well, are you entirely happy with that sentence,  22 "remains unclear"?  23 A. But, Mr Jay -- so can I try and explain the process  24 here?  25 Q. Yes.</p> <p style="text-align: center;">Page 78</p>	<p>1 a question, you get the answer. That in turn raises two  2 questions, and the two questions that were immediately  3 raised there were: how did this fit into the  4 investigation and how did it fit into the litigation?  5 As a result of that, I immediately wrote to you  6 because I immediately realised we had a problem here.  7 I sought to draw it to your attention. I should also  8 say that the following day I also sought to get in  9 contact with Mr Horton because I believed that he was  10 owed an apology, and I understand, as you've mentioned  11 initially, Mr Horton's conducted lawyers.  12 After that, we then started picking up all of our  13 emails, picking up all of the legal correspondence,  14 legal information, and as a result of that we have the  15 file that's before you today.  16 MR JAY: I have also been asked to put this to you: why did  17 the Times carry out no formal investigation in June  18 2009, at the time the formal warning was given to  19 Mr Foster?  20 A. I think this gets to the heart of it, really. We felt  21 we had a problem in terms of the behaviour of a reporter  22 and that in terms of the culture of the newsroom at the  23 time, the culture asserted itself, that as soon as we  24 were informed of a problem of behaviour, we took action.  25 We didn't commission it. We didn't condone it. When it</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 was brought to me, we confronted it and we said this 2 kind of behaviour is unacceptable. We gave him the 3 strongest possible sanction short of dismissal, we gave 4 him a formal warning for gross professional misconduct, 5 and because we believed we'd dealt with it, we didn't 6 look back or look into it enough and didn't realise that 7 there was looming, as we've since discovered, this whole 8 issue about the conduct of litigation. 9 LORD JUSTICE LEVESON: Except, except, except -- and 10 I appreciate that it's easy now to look backwards -- it 11 was made abundantly clear that had somebody joined the 12 dots together and realised that this was an offence 13 under the Computer Misuse Act, which did not have 14 a public interest defence, the Times would have taken 15 a different view, and yet that information was known to 16 Mr Brett. 17 A. Lord Justice Leveson, the whole story is about 18 information that didn't get passed through, and as you 19 remember, when we spoke last time in this room, one of 20 the things that we discussed was the nature of an audit 21 trail, and I said to you that I believed that the way 22 that this should work is that any time a journalist goes 23 to speak to a lawyer, it should be logged in the 24 managing editor's office, and my thinking is -- this is 25 not just related to this case, but generally -- that is</p> <p style="text-align: center;">Page 81</p>	<p>1 (A short break) 2 (4.07 pm) 3 MS PATRY HOSKINS: Sir, we have Mr Morgan. Can I just check 4 that Mr Morgan can see and hear us. Mr Morgan? 5 A. I can see you, yes. 6 Q. You can hear me all right? 7 A. I can, yes. 8 LORD JUSTICE LEVESON: Good afternoon, Mr Morgan, although 9 I anticipate it's morning where you are. Thank you very 10 much. 11 A. Yes. 12 LORD JUSTICE LEVESON: Thank you very much indeed for taking 13 part in this exercise. I'm very grateful. 14 A. Thank you, my Lord. 15 MS PATRY HOSKINS: Mr Morgan, I understand that you may have 16 an affirmation that you wish to read out. Do you have 17 that in front of you? 18 A. Yes, I do. 19 MR GARY MORGAN (affirmed) 20 Questions by MS PATRY HOSKINS 21 MS PATRY HOSKINS: Could you state your full name to the 22 Inquiry, please? 23 A. My name is Gary Morgan. 24 Q. You provided a statement to the Inquiry, Mr Morgan. Can 25 you confirm that the contents of it are true and</p> <p style="text-align: center;">Page 83</p>
<p>1 a much more effective way of making sure that issues of 2 concern and issues of legality are immediately brought 3 to the attention of the management of the newspaper. 4 I should say that if we'd had that process in place 5 then, I'm sure the alarm bells would have gone off much 6 sooner. 7 MR JAY: Who was it, though, who would have called for or 8 instituted a formal investigation? Would it have 9 required your imprimatur or could it have been done by 10 Mr Chappell? 11 A. In that case, either. 12 MR JAY: Okay. Thank you very much, Mr Harding. 13 LORD JUSTICE LEVESON: Thank you for returning, Mr Harding 14 I appreciate that you've brought all this to my 15 attention. I'm grateful. Thank you. 16 A. Thank you very much indeed. 17 LORD JUSTICE LEVESON: I think we'll take a little break. 18 MR JAY: Yes. We may have to take the next witness out of 19 sequence because of the video-link and the fact that 20 there's only a limited window of opportunity. 21 LORD JUSTICE LEVESON: When is the window of opportunity? 22 MR JAY: It's closing in -- the message is, subject to your 23 view, if we could take the video witness next. 24 LORD JUSTICE LEVESON: Yes. I'm sorry to Mr Mohan. 25 (3.54 pm)</p> <p style="text-align: center;">Page 82</p>	<p>1 accurate to the best of your knowledge and belief? 2 A. Yes, I can. 3 Q. Mr Morgan, you explain at paragraph 1 of the statement 4 that you are the senior vice president of Splash news 5 and picture agency. 6 A. That's right. 7 Q. We're booming sound. Just pause for a moment. 8 LORD JUSTICE LEVESON: Carry on and we'll see. 9 MS PATRY HOSKINS: You explain at paragraph 5 your career 10 history, and if I can just summarise it in this way: you 11 are originally from the UK. You worked as a journalist 12 with an agency. You then became a staff reporter on the 13 Today newspaper. After that, you travelled and you met 14 a gentleman called Mr Smith in LA in the course of the 15 year you were there. He used the business name Splash. 16 You joined him when you were 27 and then you have stayed 17 since that time with Splash. Is that -- 18 A. That's right. 19 Q. -- an accurate summary? It has now developed in the US 20 and the UK, and you've held the position of chef 21 executive officer from 1996 until 2011. From that point 22 on, you've been senior vice-president of Splash news and 23 picture agency. 24 A. That's correct. 25 Q. I've correctly summarised your career history. Thank</p> <p style="text-align: center;">Page 84</p>

21 (Pages 81 to 84)

<p>1 you.</p> <p>2 I'm going to now, please, describe very briefly how</p> <p>3 Splash operates, what it does, how many people it</p> <p>4 employs, paragraph 6 onwards of your statement, which</p> <p>5 you should find -- do you have a bundle which has behind</p> <p>6 it tab 10, your statement?</p> <p>7 A. Yes, I do.</p> <p>8 Q. You explain that you set up in California initially, but</p> <p>9 then in paragraph 8 you tell us that you set up</p> <p>10 a company in the UK in 2003. At paragraph 9 you tell us</p> <p>11 that you now in the UK employ 18 people, nine of whom</p> <p>12 are staff photographers. Is that still an accurate</p> <p>13 reflection?</p> <p>14 A. That's correct, yes.</p> <p>15 Q. Splash also has a number of websites, you explain to us.</p> <p>16 I'll pass over them by and large, except for the one</p> <p>17 that's described as paragraph 10(e).</p> <p>18 People-paparazzi.com is one of your websites, which is</p> <p>19 a platform enabling members of the public to upload</p> <p>20 photographs. I'll come back to ask you about that.</p> <p>21 By and large, you are a global enterprise, you're</p> <p>22 a picture agency and you also run a number of websites.</p> <p>23 Is that a fair and accurate summary of your business?</p> <p>24 A. That's right. Yes, it is.</p> <p>25 Q. In terms of freelancers -- and that's the only piece of</p> <p style="text-align: center;">Page 85</p>	<p>1 A. That is a fair assessment, yes.</p> <p>2 Q. As a consequence, Mr Morgan, am I right to say that</p> <p>3 there is a financial incentive for photographers and</p> <p>4 agencies to seek photographs of celebrities and others</p> <p>5 in the public eye in circumstances that might be</p> <p>6 considered to be private?</p> <p>7 A. I would say certainly there's an incentive to get</p> <p>8 exclusive photographs of celebrities, because if you're</p> <p>9 the only photographer there, the photograph is naturally</p> <p>10 worth more. However, we are expected, as an</p> <p>11 entertainment news provider, to supply photographs from</p> <p>12 all the events and non-exclusive events as part of our</p> <p>13 service.</p> <p>14 Q. Right, so both?</p> <p>15 A. Yes.</p> <p>16 Q. Finally, as the head of a celebrity photographic agency,</p> <p>17 you have a responsibility, don't you, Mr Morgan, to</p> <p>18 ensure that your photographers respect privacy and don't</p> <p>19 engage in harassment?</p> <p>20 A. Are you relating to staff and freelance or --</p> <p>21 Q. Your photographers -- yes, I think both. I'll come on</p> <p>22 to ask you about them specifically in a moment, but</p> <p>23 overall.</p> <p>24 A. Yeah, we obviously do have a responsibility to make sure</p> <p>25 that the photographs we put out follow those rules, yes.</p> <p style="text-align: center;">Page 87</p>
<p>1 the jigsaw that's missing -- you explain at paragraph 12</p> <p>2 of your statement that you have about 2,700 freelance</p> <p>3 contributors, of which about 15 per cent have UK</p> <p>4 addresses. So would it be fair to say this: that you</p> <p>5 employ a very small number of photographers but you have</p> <p>6 a very large number of freelance contributors providing</p> <p>7 photographs for your agency?</p> <p>8 A. That's correct.</p> <p>9 Q. Is that true of both the UK and the US operations?</p> <p>10 A. Yes. We have about 40 staff photographers and the rest</p> <p>11 are freelance contributors.</p> <p>12 Q. I want to ask you to agree a number of principles with</p> <p>13 me from the outset, Mr Morgan, if I can. Is it fair to</p> <p>14 say that the kinds of photographs that an agency such as</p> <p>15 yours will be after are the kinds of photographs that</p> <p>16 hopefully the market will pay a premium for?</p> <p>17 A. Ideally, every picture would have a premium price, yes,</p> <p>18 but in reality perhaps just a few per cent do. The</p> <p>19 majority of pictures are non-exclusive.</p> <p>20 Q. A photograph taken at a press event where there are lots</p> <p>21 of photographers is likely to be of less value than</p> <p>22 a photograph of a celebrity taken where there are no or</p> <p>23 fewer photographers around, ie off-duty photographs will</p> <p>24 be more valuable than on-duty photographs. Is that</p> <p>25 a fair assessment?</p> <p style="text-align: center;">Page 86</p>	<p>1 Q. Let me ask you then about the guidance that you give to</p> <p>2 your photographers. I'll ask you about employees and</p> <p>3 about freelancers, if I may. Splash is an international</p> <p>4 company, clearly subject to different laws in different</p> <p>5 countries. In the US, am I right in thinking that the</p> <p>6 protections that exist to ensure individual privacy are</p> <p>7 rather less than in the UK?</p> <p>8 A. That's correct, yes.</p> <p>9 Q. You note in the statement, paragraph 21, that you're</p> <p>10 sensitive to privacy issues in the UK. Does that mean</p> <p>11 that your photographers or freelancers in the UK are</p> <p>12 sensitive to UK privacy issues or just your UK-based</p> <p>13 photographers?</p> <p>14 A. Well, UK-based photographers -- obviously the</p> <p>15 sensitivity in the UK is -- has a higher barometer than,</p> <p>16 say, in the US. So there are a number of rules and</p> <p>17 regulations we try to adhere to. We obviously adhere to</p> <p>18 the law and the PCC regulations. So we try to fit in</p> <p>19 with the way the media generally shoots content in the</p> <p>20 UK.</p> <p>21 Q. What I mean is: when you are selling photographs to the</p> <p>22 UK market, how can you be sure that photographs</p> <p>23 operating in the US have not taken photographs in</p> <p>24 a situation that might breach the PCC code?</p> <p>25 A. Well, as far as staff are concerned, we have a -- we</p> <p style="text-align: center;">Page 88</p>

<p>1 exert a lot of control over staff photographers because                  2 we're telling them where to go and what to shoot, and we                  3 generally pick trained photographers or experienced                  4 photographers who are wise enough to know to call the                  5 desk if the way they're shooting -- if they think                  6 there's an issue, and obviously it's up to our desk to                  7 monitor that.</p> <p>8 With the freelancers, we have less control,                  9 obviously, but we try to corral that by a number of                  10 steps that we take when they upload and -- post uploads                  11 to try and catch any problematic photographs.</p> <p>12 Q. I'll come back to freelancers in a moment. Can I just                  13 touch on your employed photographers. You say that your                  14 UK-based photographers are required by their contract to                  15 comply with the PCC code. So that's the nine                  16 photographers, is it, in the UK?</p> <p>17 A. Yes.</p> <p>18 Q. They're obliged to comply with it. Do you think that                  19 the PCC code is sufficient for the purposes of guiding                  20 photographs? It's not specific to photographers in any                  21 way. Do you think it's sufficient or do you provide                  22 a more specific code or guidance that they could or                  23 should adhere to?</p> <p>24 A. I don't think the PCC is comprehensive enough for                  25 photographers at all. It seems to be directed towards</p> <p style="text-align: center;">Page 89</p>	<p>1 generally the media works within the rule of law. So                  2 the picture desk in the UK is expected to not                  3 necessarily perform on a daily basis but to advise and                  4 educate and talk to the photographers on a regular basis                  5 and instruct them if there are changes in the law, if                  6 there are things we should or shouldn't do. For                  7 example, we have a list of celebrities that we know we                  8 shouldn't go to their homes or to their place of work,                  9 et cetera.</p> <p>10 So we try to up at a time them as often as we can                  11 with the pertinent information.</p> <p>12 Q. Is that done by training, by the sending around of an                  13 email, on an informal basis? What do you mean?</p> <p>14 A. Not so much formal training, but certainly by talking to                  15 them on a daily basis or by email, if there's something                  16 we need to alert them to.</p> <p>17 Q. You have just referred to a list of individuals that you                  18 would know not to photograph. It's referred to in                  19 paragraph 21(e) of your statement as a "no shoot list".                  20 You say you have a document which you call a "no shoot                  21 list" which contains the names of individuals who may                  22 not be photographed for Splash, and that's communicated                  23 to staff and freelancers on a regular basis.</p> <p>24 Why would an individual appear in a "no shoot list"?                  25 Is it something that they request? Is this court</p> <p style="text-align: center;">Page 91</p>
<p>1 editors rather than content-gatherers. It seems to be                  2 directed mainly towards the print side of journalism                  3 rather than the digital age or photographers generally.</p> <p>4 Obviously photographers have to stay within the                  5 boundaries of the law, and there are plenty of laws on                  6 the statute books that take care of things like, you                  7 know, speeding or traffic violations, things like that.                  8 I think the press cards that all of our staff                  9 photographers have that are recognised by the police                  10 help and I think a press pass system is a good system,                  11 one we have been pushing for by in the states, for                  12 example.</p> <p>13 But generally, the staff photographs we hire are                  14 expected to know the law, expected to know the PCC and                  15 usually have a lot of experience in news-gathering, to                  16 be able to have the knowledge to know when to stop or                  17 when to call the desk and ask questions. Otherwise we                  18 rely on our news and photo desks to oversee their                  19 behaviour.</p> <p>20 Q. All right. You say that your picture desk assists                  21 photographers to apply general principles. What                  22 principles are they? Can you give us an example of what                  23 they would say?</p> <p>24 A. Obviously the photographers sign contracts that confirm                  25 they will stick to the PCC and the rules of law, and</p> <p style="text-align: center;">Page 90</p>	<p>1 orders? Can you help us?</p> <p>2 A. We monitor -- in the UK, we monitor the orders that are                  3 put into place when celebrities complain or when they                  4 ask for behaviour patterns to change, usually through                  5 lawyers sending out letters to other agencies or                  6 newspapers, and one of our responsibilities is to make                  7 sure we're not taking photographs that will put our                  8 clients at risk. So we monitor those lists and we                  9 update them regularly. It's actually updated from the                  10 picture desk and emails are sent out whenever there's an                  11 update to that list.</p> <p>12 Q. Am I right in understanding your answer is that you                  13 monitor court orders, which you receive --</p> <p>14 A. We're not actually -- yes, that we receive or that we                  15 know others are receiving. We try I to be proactive in                  16 that.</p> <p>17 Q. What if a celebrity was to get in touch with you or                  18 their agents were to get in touch with you and ask you                  19 to refrain from taking photographs. Would that work?                  20 Would that give them priority on the "no shoot list"?</p> <p>21 A. Yeah, we'd certainly talk to them about what the issue                  22 was and why they wanted that, and if we felt that their                  23 plea was good, then we would do so.</p> <p>24 Q. What if a celebrity did not approach you but made it                  25 absolutely clear by their behaviour that they had no</p> <p style="text-align: center;">Page 92</p>

<p>1 interest in being photographed, they were intensely 2 private? Would that be something you might consider? 3 Would that be someone you might consider for inclusion 4 on the "no shoot list"?</p> <p>5 A. I'm not quite sure what circumstances you're referring 6 to. If a celebrity is in a public place, perhaps, then 7 it may make a difference as perhaps if they're in 8 another circumstance. Can you define exactly what you 9 mean?</p> <p>10 Q. Yes, perhaps I haven't made myself clear. You have 11 a "no shoot list". I'm asking whether any individual 12 could ever be placed on it by you solely on the basis 13 that their behaviour has made it clear that they are 14 intensely private. For example, someone who brings 15 litigation on a regular basis in order to protect their 16 privacy or someone who simply, it's clear from their 17 behaviour, has simply no interest in being photographed. 18 Would you ever include a person like that, who has not 19 sought a court order against you, has not actually 20 formally contacted you -- would a person like that ever 21 make it on to your "no shoot list"?</p> <p>22 A. I've never come across a situation like that, but -- 23 I would certainly look at it but I couldn't say with 24 definition that I would or wouldn't.</p> <p>25 Q. All right.</p> <p style="text-align: center;">Page 93</p>	<p>1 things like that, to hold up pictures that have captions 2 that may look libellous or dodgy for whatever reason, 3 and then those processes are designed to alert the desk 4 to any problems.</p> <p>5 Freelancers generally -- obviously, we don't exert 6 control over how they behave out in the street, so our 7 only recourse is to try and monitor the photographs 8 they're uploading and to put into place procedures that 9 will either proactively or retroactively pull pictures 10 that are a problem.</p> <p>11 Q. Would you blacklist a freelancer whose photographs 12 regularly failed to comply with the tests that you 13 apply?</p> <p>14 A. We would, yes.</p> <p>15 Q. Have you ever done that?</p> <p>16 A. I don't think we have, no. We've moved occasionally, 17 photographers in the US, fast track to slow track, which 18 is a commercial disadvantage for them because their 19 pictures don't move as fast, and moving pictures to 20 market very fast is important from a business point of 21 view, but generally we -- the only resolution we have 22 with freelancers is to put them on slow track, talk to 23 them, or ultimately not to continue using them.</p> <p>24 Q. Are you aware of ever not using someone for reasons 25 that their photographs were simply obtained unethically</p> <p style="text-align: center;">Page 95</p>
<p>1 LORD JUSTICE LEVESON: So it would help you, would it, 2 Mr Morgan, if there was some available information to 3 your company of people who really were likely to indulge 4 in litigation if they were photographed? That would be 5 of value to you?</p> <p>6 A. I think greater co-operation between celebrities and 7 agencies on realising what the boundaries will and won't 8 be can't do any harm.</p> <p>9 MS PATRY HOSKINS: I'm going to ask you now about 10 freelancers. You touched briefly on the attempts that 11 you make to ensure that they behave in a manner that's 12 ethical and so on. Can you tell us a bit more? Do you 13 require them to sign up could a code of practice or any 14 kind of contractual obligation that any photo they will 15 submit will be compliant with the PCC code or that it 16 will be taken in a situation where the celebrity has not 17 been harassed or -- is there any mechanism that you put 18 in place?</p> <p>19 A. Photographers do have to sign a media upload agreement 20 in which they pledge not to invade privacy or break the 21 law in any way. The PCC regulations are available on 22 the Splash website internally. Some freelance 23 photographers are put onto -- we have a process called 24 "fast and slow track", and we have a back office that 25 has a list of objective terms, such as nudity, swearing,</p> <p style="text-align: center;">Page 94</p>	<p>1 or in breach of someone's privacy?</p> <p>2 A. I do recall in the UK I think of us cutting off one 3 freelancer, but I think that was mainly for captions 4 rather than the way she was acting.</p> <p>5 Q. Let me give you a specific example, please. It's the 6 example of Ms Hong, the lady who recently had a baby 7 with Hugh Grant. Are you familiar with that case, 8 Mr Morgan?</p> <p>9 A. Yes, I am.</p> <p>10 Q. I think I asked that you have papers available relating 11 to that case. I don't know if you have a full panoply 12 of papers available in front of you so I'll go through 13 the chronological, if I can, and you can tell me whether 14 you agree or disagree. I'll do it as briefly as I can.</p> <p>15 A. Okay.</p> <p>16 Q. Start this way. Shortly after Ms Hong gave birth, she 17 was subjected, it is said, to a sustained campaign of 18 harassment by photographers outside her home. Mr Grant 19 gave evidence to that effect at this Inquiry. He also 20 provided a witness statement which made those 21 allegations. Are you aware of that?</p> <p>22 A. Yes, I am.</p> <p>23 Q. I understand that on 11 November 2011, an injunction was 24 obtained on behalf of Ms Hong against persons unknown, 25 and the objective behind the obtaining of that</p> <p style="text-align: center;">Page 96</p>



<p>1 injunction was to essentially prevent the campaign of 2 harassment that she'd been suffering, so to prevent 3 photographers from doing a number of things or anyone 4 from doing a number of things, including harassing her 5 outside her home, taking photographs and so on. You're 6 aware of that injunction that was obtained? 7 A. Yes. 8 Q. We're also told -- it's in the public domain -- that 9 shortly after the order was obtained, a copy of it was 10 circulated to a number of people, including your agency. 11 You accept that you received that? 12 A. That's right, yes. 13 Q. This was one of the orders you were describing earlier 14 that you would be aware of. 15 A. Yes. 16 Q. Can we confirm that at that point Ms Hong made it onto 17 your "no shoot list"? 18 A. Yes. As soon as we receive a letter from a lawyer 19 regarding an injunction or a legal complaint, we 20 automatically put them onto a "no shoot list" and 21 withdraw any photographs in question while we 22 investigate the claim. 23 Q. All right. Again, it's in the public domain that 24 Ms Hong's solicitors then made enquiries of the DVLA in 25 the UK in relation to a number of cars that had been</p> <p style="text-align: center;">Page 97</p>	<p>1 you would consent to the order being made, and on that 2 basis, you were joined as defendants in that claim. Is 3 that a fair and accurate assessment? 4 A. That's correct. Yes, it is. 5 Q. Given the allegations that were made, can you tell me 6 what action you took to ascertain what the behaviour of 7 Mr McFarlane had been during the relevant period? 8 A. Yes. We had the London picture desk interview him and 9 then I interviewed him afterwards. We had him show us 10 on a Google map -- a GoogleEarth map exactly where he 11 was and where the person that we now know to be the 12 mother -- we didn't know at the time -- was standing and 13 his version of events that day. 14 Q. You don't have to tell me any more about the detail of 15 that, but do tell me this: were any disciplinary 16 proceedings taken against him? 17 A. They weren't, because I believe his story that he didn't 18 drive at her, and at this point in time it's her word 19 and his word. So we have no -- there's been no decision 20 either way on who's correct. 21 I think there's some confusion about that day as 22 well. There are pictures of two or three cars and 23 there's reports that that day she was out with her 24 daughter and we didn't see her with her daughter. So 25 I'm not 100 per cent sure that she was referring to</p> <p style="text-align: center;">Page 99</p>
<p>1 outside Ms Hong's house at the relevant times, including 2 one car, it was alleged, which had driven at Ms Hong's 3 mother outside the house in a particularly aggressive 4 manner. Again, having seen the papers, you should be 5 aware of those enquiries that were made of the DVLA. 6 A. Yes. 7 Q. Was that a fair and accurate assessment of what 8 happened? The car which had been driven at Ms Hong's 9 mother was identified to a gentleman called Colin 10 McFarlane. Can you confirm that Colin McFarlane works 11 for Splash? 12 A. He does. 13 Q. Is he an employed photographer or is he a freelance 14 photographer? 15 A. He's employed. 16 Q. So he's one of the employed photographers whose contract 17 makes it clear that he ought to abide by the PCC code; 18 is that right? 19 A. Yes. Yes. 20 Q. When this information was discovered, an application was 21 made to join Mr McFarlane and Splash in the proceedings, 22 and as I understand it, shortly before the return date 23 of 2 December of last year, you sent in some 24 correspondence to the effect that although you denied 25 any wrongdoing on the part of Mr McFarlane or Splash,</p> <p style="text-align: center;">Page 98</p>	<p>1 Colin. 2 To be honest, I don't know, but I would highly be 3 suspicious of Colin doing that. 4 Q. All right. I appreciate what you say, that you've 5 interviewed him, you've listened to his version of 6 events. Assuming for a moment that it was established 7 that this behaviour did occur, what would be your view 8 of the behaviour? 9 A. If it was established that he had driven at this lady, 10 then he would be fired. 11 Q. I'm going to ask you now to turn to tab 12. Hopefully 12 you have there an apology that Splash made to David 13 Walliams and Lara Stone. Do you see that? 14 A. Yes. Yes, I do. 15 Q. For those who don't have it, this is an apology you made 16 on 30 August 2011, and the apology says in very brief 17 terms: 18 "In April 2011, photographs pursued David Walliams 19 and Lara Stone while they spent the day together in 20 London. Splash subsequently made these images available 21 for onward publication. We wish to convey our apologies 22 to the couple for the harassment and unwarranted 23 intrusion into their private lives and make it known 24 that we have reimbursed all legal costs and have paid 25 them damages."</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 Do you know whether or not that apology was made in 2 the light of a previous injunction? 3 A. The apology was made as part of the settlement to stop 4 the proceedings going further and costing both sides 5 more legal fees. 6 Q. Had there been a previous injunction preventing you from 7 taking photographs or anyone else from taking 8 photographs in this way? 9 A. I don't think there had been an injunction against us. 10 I don't recall completely, I am afraid. 11 Q. You don't have a copy of those papers? 12 A. I don't have a copy of those papers, no. 13 Q. I don't want to be unfair if you don't have the relevant 14 papers. 15 Let me turn back to your statement very briefly. 16 Right at the end of your statement, please, page 11, the 17 second-last page, you are asked some questions about 18 Charlotte Church. You are asked whether your agency has 19 ever instructed any photographer, employed or otherwise, 20 to follow or take photographs up the skirt of 21 Charlotte Church. I can't put it any more delicately 22 than that. You say no, and then you say this -- do you 23 see this, paragraph 42: 24 "Many celebrities have a symbiotic relationship with 25 the press and some celebrities willingly reveal Page 101</p>	<p>1 Q. I'm going to ask you finally about people paparazzi and 2 citizen journalism. You invite people, through the 3 people-paparazzi website, to contribute photographs, 4 individuals, members of the public, to contribute 5 photographs. Are they subject to contractual terms and 6 conditions? 7 A. Yes. People-paparazzi allows members of the public to 8 upload pictures through an email. We look at those 9 pictures on email, and if we think the picture has any 10 relevance, then we contact the person, asking them how 11 the photograph was taken. If we want them to submit the 12 photograph, we then ask them to fill in the media 13 distribution agreement which applies to all 14 photographers. 15 Q. What kind of questions would you ask them to ensure 16 that, again, the privacy of the celebrity has not been 17 infringed, the celebrity was not being harassed at the 18 time the photograph was being taken and so on? Because 19 presumably members of the public don't have access to 20 the training and the daily briefings that you've been 21 speaking of. So what questions are asked? 22 A. Kind of questions -- usually if there's a picture that 23 we want, we're pretty sure when we're talking to the 24 person anyway that it looks like it's a public place or 25 event. You know, if it's a picture of them inside Page 103</p>
<p>1 themselves as part of the promotion of their image. 2 Where it is clear that the celebrity has knowingly and 3 willingly been photographed in this way, then we take 4 the view that such photographs are justified." 5 Are you genuinely saying to this Inquiry that 6 celebrities co-operate with photographers to have 7 photographs taken in this way? 8 A. Yes. It happened in the US. 9 Q. And what steps do you take to ensure that the celebrity 10 has consented before obtaining such a photograph or 11 syndicating such a photograph? 12 A. Generally, it's by behaviour, and in the case of one 13 celebrity, it was the fact that what is used -- the 14 slang term used in the US is "going commando", and it 15 became a -- it became a well-known practice of certain 16 three or four lady celebrities to do this, and the fact 17 they did it multiple times in a very short period of 18 time indicated that the behaviour was wanton. 19 Q. So in the case of three or four people, you say? 20 A. Yeah, it was three or four particular celebrities in the 21 US that went -- that actually went along this line for 22 a little while. It was kind of a prank, almost. 23 Q. And you can tell whether someone has consented by their 24 behaviour? Is that your evidence? 25 A. Yes. Page 102</p>	<p>1 a house or, you know, inside a hotel or something, we'll 2 know that there's more of a risk there. 3 So we'll ask them where they took it, how they took 4 it, where they were, what camera they were using. Did 5 they talk to the celebrity? How did they know the 6 celebrity was there? We'll go through pretty much the 7 same kind of questions we would ask a photographer. 8 MS PATRY HOSKINS: Mr Morgan, I think those are my 9 questions. 10 LORD JUSTICE LEVESON: Thank you. Mr Morgan, I have 11 a couple. First of all, entirely confidentially and to 12 be kept within the Inquiry team, would you be prepared 13 to send us a copy of your present "no shoot list" for 14 the UK? 15 A. Yes, my Lord. 16 LORD JUSTICE LEVESON: Secondly, you've made the point that 17 the PCC code doesn't really cover many of the issues or 18 some the issues that you believe would be valuable to 19 cover for photographers. 20 A. That's correct. 21 LORD JUSTICE LEVESON: Would you, please, also let me know 22 what you think it could cover, how you think it could 23 cover them, and any suggestions you have to make that 24 would assist. I'm not trying to prevent photographs 25 being taken but I am trying to prevent them being taken Page 104</p>

<p>1 in a way that is disorderly or is going to infringe 2 people's rights. 3 A. I'd be -- 4 LORD JUSTICE LEVESON: You have an enormous amount of 5 experience, Mr Morgan, and I'd be grateful if you'd be 6 prepared to share that with us. 7 A. I'd be happy to. 8 LORD JUSTICE LEVESON: Thank you very much indeed. 9 MS PATRY HOSKINS: Sir, before I sit down, I've been told 10 that there is one statement which needs to be read into 11 the Inquiry. Nothing to do with Mr Morgan. 12 LORD JUSTICE LEVESON: Mr Morgan, thank you very much indeed 13 and I am grateful for you participating in this exercise 14 over a live link. It's saved you a lot of time and 15 trouble and allowed us to get the benefit of your 16 evidence. Thank you. 17 A. Thank you, my Lord. 18 MS PATRY HOSKINS: The statement to be read in is that of 19 Mr Simon Citron from Yahoo. 20 LORD JUSTICE LEVESON: Thank you very much. We'll 21 disconnect Mr Morgan, with no disrespect to him and 22 we'll carry on. 23 MR JAY: Sir, I am going to recall, please, Mr Mohan. 24 LORD JUSTICE LEVESON: Thank you very much indeed. 25</p> <p style="text-align: center;">Page 105</p>	<p>1 Kensit. 2 If we can look at the fourth insert: 3 "A pal of the couple said last night: "You'd have 4 thought after being on tour for such a long time, Patsy 5 would have wanted to see him, but they just don't appear 6 to want to be together or even to talk to each other. 7 She was only an hour away by plane but she didn't come 8 back and has been telling people she's just about had 9 enough. The couple married in secret [et cetera] ... 10 They are a stream of fierce rows over the phone while 11 Liam was on the road ..." 12 And then it continues. What was your source for 13 that story, Mr Mohan? Can you recall? 14 A. The articles you're going to point me to, obviously 15 a lot of them are up to 14 years old and I can't 16 remember specific sources obviously. But to talk 17 generally -- I just wanted to give you a picture of 18 showbiz reporting. I mean, many stories really 19 generally are obtained through going to events, talking 20 to celebrities at events, at nightclubs, in bars. 21 At this kind of time I was travelling the world 22 interviewing a lot of celebrities who would tell me 23 things off the record, for instance. I mean, I don't 24 remember the specific -- who wrote this story or the 25 specifics of it, so --</p> <p style="text-align: center;">Page 107</p>
<p>1 MR DOMINIC MOHAN (recalled) 2 Questions by MR JAY 3 MR JAY: Mr Mohan, there are a number of specific matters 4 I'd like you to deal with, please. The first relates to 5 phone hacking, matters which have been drawn to the 6 Inquiry's attention, relating to the time when you were 7 editor of Bizarre. In the bundle which has been 8 prepared, look at tab 5. 9 LORD JUSTICE LEVESON: One of the great problems of having 10 been the first editor to give evidence is that in the 11 period which has elapsed since you gave evidence, many 12 things have been sent to the Inquiry, and it's only fair 13 that you be given an opportunity to deal with them. 14 A. Thank you. 15 LORD JUSTICE LEVESON: Right. 16 MR JAY: There are a number of similar pieces, Mr Mohan, in 17 Bizarre, and the question is: does a pattern emerge? 18 Can we look first of all at this article. It's 9 April 19 1998, so self-evidently we're going back in time 20 a considerable period. You are editing Bizarre with 21 someone called Victoria Newton. We can see that at the 22 top of the page. This piece is: 23 "Liam and Patsy on the rocks. 'I've had enough,' 24 she tells mates." 25 This relates to Liam Gallagher's marriage to Patsy</p> <p style="text-align: center;">Page 106</p>	<p>1 Q. We can see that actually from the bottom. The showbiz 2 team -- we can see Sean Hoare's name. 3 A. Yes, he was a member of the team at that point. 4 Q. Yes, and his name resonates with the Inquiry in certain 5 ways and it also features in relation to other articles. 6 Are you sure that this article was not obtained by 7 hacking into a telephone, in particular the voicemail 8 messages? 9 A. It doesn't actually mention any content of any voicemail 10 message, and actually -- often when you get a story 11 about a relationship, somebody starting dating, you'll 12 usually ring an agent or a PR, and a classic response 13 from them will be: "It's early days, they've been 14 talking on the telephone." I can remember many, many 15 examples of that, and similarly, I also remember one 16 specific story -- not one of these -- where a very 17 well-known A list celebrity told me, off the record, 18 that another female celebrity had been calling him 19 repeatedly, and I ran a story as a result. 20 So I don't know the specifics, but it would not be 21 uncommon for the stories to be obtained that way. 22 Q. Even information such as "they had a stream of fierce 23 rows over the phone"? You think that was provided by 24 the pal who is referred to, rather than by some other 25 means?</p> <p style="text-align: center;">Page 108</p>

<p>1 A. I mean, there were a lot of stories that we were 2 receiving at this time about Liam Gallagher and Patsy 3 Kensit and there were a lot of contacts reporters had in 4 that kind of area, so I would think a more likely 5 explanation would be that it would come from one of 6 them.</p> <p>7 Q. It's really whether a pattern builds up through this 8 material. Item tab 6. We're now onto 17 July 1998. 9 The bottom right-hand side, if you're with me there: 10 "Eastenders star Martine McCutcheon is dating pop 11 sensation Mark Baron, we can reveal." 12 A bit later on: 13 "Pals say ..." 14 It's always that formulation, "pals say": 15 "... that the pair had phoned each other every day 16 since they met. One says, "They liked each other 17 straight away and got on like a house on fire ..." 18 Et cetera. Again, the showbiz team, we see Sean 19 Hoare's name, don't we?</p> <p>20 A. We do. Again, I can't remember the specifics of the 21 story. I don't think you probably expect me to. In 22 fact, I can't even remember some of the celebrities 23 mentioned in the stories. But again, I remember that 24 there was a -- one of the journalists on the team had 25 a good Martine McCutcheon contact at the time and we</p> <p style="text-align: center;">Page 109</p>	<p>1 A. Again, I can't recall the specifics, but -- I mean, we 2 can go through every single one but I don't feel I can 3 be expected to remember exact sources from 14 years ago.</p> <p>4 LORD JUSTICE LEVESON: Would to be fair, Mr Mohan, that 5 you'll be given stories by people in your team, and if 6 they appeared right to you, and perhaps checked with 7 your own sources, you wouldn't necessarily enquire where 8 they had come from?</p> <p>9 A. Yes. We would get stories from numerous sources: 10 journalists who worked on the team, other journalists on 11 the paper and agencies and freelancers.</p> <p>12 MR JAY: There's another one at tab 8. Again, the showbiz 13 team is Sean Hoare and someone else this time. The 14 headline is "Sporty's got the hots for Chilli singer": 15 "Sporty Spice, Mel C has been secretly dating Red 16 Hot Chilli Peppers' Anthony Kiedis, Bizarre can reveal." 17 And then moving on a bit: 18 "Wild Anthony, who once dated Madonna, asked Mel out 19 and has been bombarding her with phone calls ever 20 since." 21 Then there's reference to what a source allegedly 22 said. 23 Again, we're going to see in relation to future 24 articles the term "bombarding her with phone calls". 25 That's a turn of phrase quite often deployed. Are you</p> <p style="text-align: center;">Page 111</p>
<p>1 would receive quite a lot of information from that 2 individual.</p> <p>3 Q. The formulation "pals say" or a "pal", that isn't a sort 4 of code for some other means of obtaining information, 5 is it?</p> <p>6 A. No, I think that often if you do talk to an agent or 7 a representative or the celebrity themselves or 8 a friend, obviously, you could describe them in that 9 way. I mean, if -- I remember, for instance, the one 10 I've just referred to about the A list celebrity 11 speaking to me, you know, about the being bombarded with 12 phone calls. He specifically said that he didn't want 13 to be named, and so therefore it would have been 14 attributed as a pal or a friend.</p> <p>15 Q. The next one is an exclusive story. This is to do with 16 an Eastenders star, Sid Owen. Do you see that on the 17 right-hand side?</p> <p>18 A. Yes.</p> <p>19 Q. He's back with his girlfriend, Lucie Braybrook. She'd 20 moved out, but: 21 "Heartbroken Sid, grease monkey Ricky Butcher in the 22 BBC soap, made a series of phone calls begging her to 23 give their two-year relationship one more chance." 24 Are you sure that wasn't obtained by hacking into 25 a voicemail?</p> <p style="text-align: center;">Page 110</p>	<p>1 sure this one wasn't obtained by hacking into 2 voicemails?</p> <p>3 A. I cannot remember the specifics of this story. That's 4 all I can say.</p> <p>5 Q. If I was to --</p> <p>6 A. It may well be that -- again, as I say, you would have 7 a tip that somebody was perhaps dating. You would ring 8 an agent or a representative, and they may well say, 9 "Look, it's early days, they've been talking on the 10 telephone but there's not much more to it." I can 11 remember having phone calls along those lines.</p> <p>12 Q. There's another bombardment with phone calls in the next 13 one, tab 9. It's to do with Robbie Williams. Under the 14 subheading "Fault", a "close pal" allegedly said 15 something. In tab 10, I think it's another "bombarding 16 with phone calls", but let me check. No, the reference 17 this time is to "making late-night calls". 18 A lot of information is obtained in or around 19 knowing what is happening in telephone calls, isn't it?</p> <p>20 A. Well, it's a bit of colour to illustrate a story about 21 a relationship or a split.</p> <p>22 Q. Might these stories have been obtained by hacking into 23 voicemails?</p> <p>24 A. Look, I can't say 100 per cent, and there is an internal 25 investigation being conducted at the moment by the</p> <p style="text-align: center;">Page 112</p>

28 (Pages 109 to 112)

<p>1 Management Standards Committee at News International, as 2 you well know. But what I would say is you've picked 3 a number of stories over more than three years, and I'm 4 sure if you took a sample from any number of newspapers 5 over a three-year period, there would be numerous 6 references to phone calls.</p> <p>7 Q. There's quite a good one at tab 11, Mr Mohan. This time 8 I think you're the sole editor of Bizarre, 18 April 9 2000:</p> <p>10 "Watch out, Mel C, man eater Caprice has her sights 11 set on your boyfriend. The sexy blonde has been 12 bombarding 5ive singer J with phone calls."</p> <p>13 So we have another bombardment, don't we? Then 14 a bit later on, under "Fancies":</p> <p>15 "An insider tells me she really fancies J and keeps 16 ringing on his mobile. She's made it clear from the 17 start that she wants it."</p> <p>18 That insider was not someone who'd been hacking into 19 voicemails, was it?</p> <p>20 A. Not that I'm aware of, no. Again, I can't remember the 21 source of the story or who wrote it.</p> <p>22 Q. Tab 13. This time it's the footballer. More 23 bombardment:</p> <p>24 "The Manchester United winger has been bombarding 25 the model with phone calls after they met at the World Page 113</p>	<p>1 material that came to us actually by a circuitous route. 2 That perhaps doesn't matter much, but the suggestion is 3 there are many more stories like that. That would be 4 a fair comment, wouldn't it?</p> <p>5 A. I'd have to check.</p> <p>6 Q. You say you made a joke at the Shafta Awards 2002 about 7 lack of security at Vodafone, I think it was, in 8 relation to the Mirror. That joke created the biggest 9 laugh or cheer of the night, didn't it?</p> <p>10 A. I don't remember what got the biggest laugh and what 11 didn't.</p> <p>12 Q. But at an awards ceremony like this, you're going to 13 come out with in-jokes rather than something which is 14 old news. Would you accept that?</p> <p>15 A. It was a joke that I made. We talked about it last time 16 I was here. The award ceremony was sponsored by 17 Vodafone, so I guess it popped into my head and seemed 18 apt.</p> <p>19 Q. But you must have come up with it because it was 20 something which you knew your audience would know 21 themselves was something which was regularly talked 22 about?</p> <p>23 A. As I said last --</p> <p>24 Q. It was something which was current, really, in your 25 business, wasn't it?</p> <p>Page 115</p>
<p>1 Sports Awards in Monaco." 2 Do you have that one, under tab 13?</p> <p>3 A. Sorry.</p> <p>4 Q. 4 August 2001. So there's the bombardment, and then in 5 the middle paragraph:</p> <p>6 "They have spoken on the phone loads, but she isn't 7 interested."</p> <p>8 We don't know who wrote this story, do we?</p> <p>9 A. I don't recall, no.</p> <p>10 Q. What might be said in relation to these stories is that 11 there's a small kernel of truth, that is to say 12 information obtained by hacking into voicemails, and an 13 awful lot of embroidery and confection around that 14 kernel of truth which your column simply makes up. Is 15 that true or not?</p> <p>16 A. I'm not aware of that being the case, no. I'm not aware 17 that illegally accessing voicemails were the source of 18 any of these stories.</p> <p>19 Q. Are you sure about that?</p> <p>20 A. I have no knowledge of it. It's over a three-year 21 period. There's -- we published many, many stories over 22 a period of a year. In fact, we publish over 100,000 23 articles a year in the Sun this is a very small 24 selection over a three-year period.</p> <p>25 Q. Yes. You're aware who provided the Inquiry with this Page 114</p>	<p>1 A. As I said last time, there had been rumours swirling 2 around the industry, and I think I've referred to 3 several articles earlier that had put that information 4 in the public domain, so it was known not only in 5 journalism but to the broader public, I would suggest.</p> <p>6 Q. When you gave your evidence last time, had you read the 7 transcript of Mr Piers Morgan's evidence?</p> <p>8 A. I watched Mr Morgan's evidence. I don't know that I'd 9 read the transcript.</p> <p>10 Q. No. Because are you aware that he used the term "rumour 11 mill", didn't he?</p> <p>12 A. He may have done. If you're telling me he did, then 13 yes.</p> <p>14 Q. He did. Page 66 of the transcript for 20 December last 15 year. That was exactly the term that you used, wasn't 16 it, when you gave evidence last time?</p> <p>17 A. Yes, if you're -- if that's on the transcript, yes.</p> <p>18 Q. Then you said you couldn't remember precisely what the 19 basis of the rumours might be. I paraphrase your 20 evidence. Are you sure about that, Mr Mohan?</p> <p>21 A. Yes.</p> <p>22 Q. I suggest to you that you deliberately used Mr Morgan's 23 phrase, "rumour mill", because it was, if I may say so, 24 similarly disingenuous, that each of you knew that 25 voicemail hacking was going on in your respective Page 116</p>

29 (Pages 113 to 116)

<p>1 organisations. That's the truth, isn't it?</p> <p>2 A. No. That's not the -- not the case.</p> <p>3 Q. Okay. May I move on to a separate topic and may I deal</p> <p>4 with it in this way, by taking it through stages.</p> <p>5 The first stage is the Page 3 girl, which you cover</p> <p>6 in your witness statement.</p> <p>7 A. Yes.</p> <p>8 Q. In a nutshell, your position is -- in your own words,</p> <p>9 please, Mr Mohan. I'm not going to put words in your</p> <p>10 mouth or read out your statement. You set out your</p> <p>11 stall in relation to Page 3.</p> <p>12 A. There's obviously been quite a lot of criticism I've</p> <p>13 read of late of Page 3, but my position is -- I mean,</p> <p>14 this was first published 42 years ago, and I think it's</p> <p>15 meant to represent the youth and freshness and it</p> <p>16 celebrates natural beauty. We don't have models who</p> <p>17 have had plastic surgery on the page. It's obviously</p> <p>18 legal. We're allowed to publish those images, and</p> <p>19 I think it's become quite an innocuous British</p> <p>20 institution where, as a parent myself, I'm more</p> <p>21 concerned about images that my children might come</p> <p>22 across on the Internet or on digital devices. So</p> <p>23 I think it's a part of British society. I think on our</p> <p>24 40th anniversary, I've included a piece that was written</p> <p>25 by the feminist author Germaine Greer. She says:</p> <p style="text-align: center;">Page 117</p>	<p>1 last year we launched a campaign after the implant</p> <p>2 scandal, where we demanded safer surgery for women, and</p> <p>3 also Jade's Legacy, which was set up after the death of</p> <p>4 Jade Goody, which was raising awareness of cervical</p> <p>5 cancer screening.</p> <p>6 So I think some of the allegations that I've heard</p> <p>7 about the Sun being sexist in some way and not tackling</p> <p>8 women's issues I think is a false one.</p> <p>9 Q. It has been said that Page 3 treats women as sex objects</p> <p>10 is therefore not merely demeaning but is harmful. As</p> <p>11 against that, you may pray in aid the wider public</p> <p>12 interest in freedom of expression, which of course the</p> <p>13 Sun is entitled to put forward, but do you see any merit</p> <p>14 in that first objection? The objectification of women?</p> <p>15 A. No, I don't, because I think that the girls are very</p> <p>16 healthy, for instance. They're good role moulds. If</p> <p>17 you look at a lot of catwalk models, they're stick thin.</p> <p>18 Some of them don't look they healthy. So I would</p> <p>19 disagree with that.</p> <p>20 Q. Can I deal with a number of points which are around</p> <p>21 Page 3. One of them is before your time. Under</p> <p>22 tab 17 -- this is before your time as editor -- I don't</p> <p>23 have the date, but this is a piece which is rudely</p> <p>24 critical of Clare Short, isn't it?</p> <p>25 A. It is.</p> <p style="text-align: center;">Page 119</p>
<p>1 "If I ask my odd-job man what he gets out of Page 3,</p> <p>2 he tells me simply: 'It cheers me up.'"</p> <p>3 But what I would say is I think that the ultimate</p> <p>4 sanction lies with the reader. The reader is not</p> <p>5 compelled to buy the newspaper on a daily basis, so</p> <p>6 I think it is tolerated in British society by the</p> <p>7 majority of British society. I don't think that the</p> <p>8 images are sexualised in the way that even some clothed</p> <p>9 images are in magazines, advertisements, pop videos, and</p> <p>10 I think that it's worth looking at Page 3 in a wider</p> <p>11 context, and in the Sun's context of women's issues that</p> <p>12 we cover. A lot of the Page 3 girls, they're much more</p> <p>13 than models. They've become ambassadors for the paper.</p> <p>14 A number of them have travelled to Afghanistan, are</p> <p>15 heavily involved in Help For Heroes and raising money.</p> <p>16 Some have gone into careers in photography, and</p> <p>17 I think -- you shouldn't look at Page 3 in isolation.</p> <p>18 You should look at all the other work we do with women's</p> <p>19 issues. I outline quite a few of the campaigns here</p> <p>20 that we've run, one against domestic violence in 2003,</p> <p>21 which -- there's also a letter from the head of one of</p> <p>22 the domestic violence charities, Refuge, which is</p> <p>23 attached. There's the Stop Rape Now campaign,</p> <p>24 a Herceptin campaign which was trying to draw attention</p> <p>25 to the availability of the Herceptin cancer drug. Also</p> <p style="text-align: center;">Page 118</p>	<p>1 Q. Is this appropriate language, do you think, to use,</p> <p>2 Mr Mohan?</p> <p>3 A. It's not probably something I would run now, no.</p> <p>4 Q. To be fair, I'm sure this isn't you, and we don't have</p> <p>5 a date for it, but we have an earlier piece for which we</p> <p>6 do have a date, tab 18. This is January 2004, when</p> <p>7 you're working for the paper but you're not editor.</p> <p>8 I think you'd left Bizarre by then. Where were you</p> <p>9 in January 2004 within the Sun?</p> <p>10 A. I think I would have -- after I left Bizarre, I became</p> <p>11 a columnist. I had a weekly opinion column in the</p> <p>12 paper.</p> <p>13 Q. Did you have any involvement in this piece we're looking</p> <p>14 at?</p> <p>15 A. No. I don't believe I did.</p> <p>16 Q. Is it the sort of piece which the Sun would run now, do</p> <p>17 you think?</p> <p>18 A. Possibly not in that way, no. I mean, I think there is</p> <p>19 an article in -- actually, I'm not sure it's in this</p> <p>20 piece. It was in one of the submissions from one of the</p> <p>21 women's groups, but I ran a similar piece -- sorry,</p> <p>22 I ran a piece in the run-up to the last election</p> <p>23 where -- which was about Harriet Harman and Lynne</p> <p>24 Featherstone because they were claiming they wanted to</p> <p>25 ban page 3, but I didn't use that kind of language that</p> <p style="text-align: center;">Page 120</p>

<p>1 was used in the previous article. It wasn't as -- we                  2 weren't on the offensive in that way.                  3 Q. Not as offensive, frankly.                  4 A. Possibly.                  5 Q. Possibly or probably when one looks at it, Mr Mohan.                  6 What do you think?                  7 A. As I say, I don't think I would run it in that way now,                  8 although I do think -- I mean, clearly "fat and jealous"                  9 is in quotes. It is a quotation from somebody.                  10 Q. Frankly, there's a rather, if I may say so, stupid piece                  11 of popular science, which is tab 19.                  12 A. Mm.                  13 Q. Which is a really ridiculous attempt to suggest that                  14 looking at Page 3 makes you brainy. The point is being                  15 made that it might stimulate mental activity but it                  16 doesn't stimulate improvement in brain function. You                  17 wouldn't support that sort of journalism now, would you,                  18 Mr Mohan? Or would you?                  19 A. I think that was a cheeky interpretation, really, of                  20 a scientific survey. I think tongue was firmly planted                  21 in cheek when that was written.                  22 Q. So it was a joke and we shouldn't take it too seriously;                  23 is that right?                  24 A. I think -- another one of the science groups actually                  25 did praise our science coverage. I mean, one of my                  Page 121</p>	<p>1 you'll agree shall. If you go to the Object submission,                  2 which is under tab 18. This was evidence given I think                  3 exactly two weeks ago. If we look at 54276 --                  4 A. Could I stop you there? I think I might have                  5 a different bundle here.                  6 Q. I'm terribly sorry. It's tab 16.                  7 A. Got it.                  8 Q. 54276?                  9 LORD JUSTICE LEVESON: If you say the page number of the --                  10 A. Page 6.                  11 MR JAY: Page 6 on the internal numbering, if yours hasn't                  12 been --                  13 LORD JUSTICE LEVESON: I don't have a numbered version.                  14 MR JAY: I'm terribly sorry.                  15 LORD JUSTICE LEVESON: Yes, page 6.                  16 MR JAY: They've taken one week in the life the Sun, and                  17 indeed other papers, to be fair, from 14 to 20 November,                  18 and we see some pieces which, on any view, are                  19 unpleasant and derogatory, aren't they? The first                  20 example at the bottom of the page, the reference to                  21 Mitchell brothers. Do you see that one?                  22 A. I do.                  23 Q. Why do you use language like that?                  24 A. I think this has to be put in context. This was on the                  25 Bizarre column, which Gordon Smart, who you heard                  Page 123</p>
<p>1 first jobs as editor was appointing Professor Brian Cox                  2 as our Sun professor, who I think I mentioned at my last                  3 appearance.                  4 LORD JUSTICE LEVESON: Not only did you mention it, but                  5 I think I referred to it when the science representative                  6 came to give evidence. But I am sure you understand the                  7 point that she was making, that sometimes -- I'm not                  8 talking about this article particularly, but sometimes                  9 the headline creates a concern or a problem which                  10 detailed understanding of the research doesn't maintain.                  11 That's obviously a problem.                  12 A. Yes, and obviously our job is to try and really make                  13 that information as concise as possible and maybe                  14 explain a very complex and detailed scientific report in                  15 several hundred words.                  16 LORD JUSTICE LEVESON: Yes, and you will doubtless recall                  17 that I've applauded that, but then it's quite important                  18 that those who are responsible for writing the headline                  19 don't ruin the effect of the very valuable piece of                  20 writing that you've done by creating a headline that                  21 will certainly grab attention but actually misstates the                  22 position.                  23 A. I understand.                  24 MR JAY: Taking it one level lower, if I can put it in those                  25 terms -- and as soon as I show you the material, perhaps                  Page 122</p>	<p>1 from -- it's written with -- it has a certain character                  2 to it, maybe slightly laddish humour, and it's meant to                  3 be humorous. I'm sure Kelly Brook wasn't particularly                  4 offended. She's made quite a good living out of wearing                  5 not too many clothes, and actually this picture was                  6 sent -- was an official picture, I believe, sent out by                  7 the film company to promote the film.                  8 Q. Maybe it's not so much the use of the picture, although                  9 one could debate that; it's the usual of "Mitchell                  10 brothers". Are you proud of that language?                  11 A. I think it's a humorous term. I mean, it's obviously                  12 referring to the two rather large bald headed men who                  13 appeared on Eastenders. I think it's a comedy mechanism                  14 which some people may have found funny; some may not.                  15 Q. Example 3 on the next page, page 7, or 54277. It's                  16 difficult to read this one, I understand. Can you see                  17 what it's about, though:                  18 "The Sun trials Debenham's invisible shaping bum                  19 boosters by testing men's reaction to a woman's bottom                  20 when she stands at the bar and bends down at work.                  21 Success is marked when men ogle. In this way, the Sun                  22 eroticises a form of sexual harassment, making it appear                  23 that it is what women should and do seek from men."                  24 It's a fair point being made there, isn't it?                  25 A. I think it was simply a feature where a new form of                  Page 124</p>

<p>1 underwear was being road-tested by a female, and it was 2 tested in a light-hearted ways, and actually I think if 3 you read the women's verdict, she does actually say that 4 it made her feel quite uncomfortable wearing the 5 underwear. 6 Q. But "success is marked when men ogle"; that appears to 7 be the message, doesn't it? 8 A. I can't see the exact words, but perhaps. Do you have 9 it? 10 Q. I can't see the exact words either, but I have seen it 11 on another version of this. 12 Example 4. You can see it's a fictitious scenario, 13 but it's -- some would say it's silly, but some would 14 say it's offensive. What would you say it is? 15 A. Well, the Sun is -- its humour and its light-hearted 16 nature has really been the key to its success, in my 17 view. This is actually a picture provided by Alison 18 Jackson, who is a very, very well-respected photographer 19 who spoofs different scenes. This shot showed Prince 20 Harry pinching Pippa Middleton's bum. Pippa Middleton's 21 bum had obviously become a bit of an international 22 sensation after the royal wedding and I noticed recently 23 her Pilates teacher released a DVD which is basically 24 teaching women how to get a bottom like Pippa's. So 25 I think it's just a bit of highlight-hearted fun based</p> <p style="text-align: center;">Page 125</p>	<p>1 to you it's fairly made: 2 "Rooney keeps his name. However, the prostituted 3 woman from whom he paid for sex acts is labelled with 4 the pejorative derogatory label 'tart' in an article 5 about her father's heart attack." 6 It's devoid of humanity and it's offensive, isn't 7 it? 8 A. I think the word "tart" has been used in headlines 9 referring to prostitutes for many, many decades. I do 10 think in this context it does grate with me and it's 11 something I would think about greatly before doing 12 again. 13 Q. Yes. May we look at the submission by 14 Trans Media Watch, coming to give evidence tomorrow. 15 This is under tab 14. 16 It's fair to say that although I'm asking questions 17 of you, you're not the only paper singled out, both by 18 Object in their submission and Trans Media Watch in 19 their submission. But if we could look at page 12 on 20 the internal numbering. It's our page 58521. It's not 21 that clear, the way it's come out in the photocopy. 22 It's a piece, I think, for 24 October 2009. Were you 23 the editor then? I can't recall. 24 A. Yes. Several months in. 25 Q. I think you'd just been made editor.</p> <p style="text-align: center;">Page 127</p>
<p>1 around a picture by a very respected photographer. 2 Q. Well, issues of taste and offensiveness fall on one line 3 of the divide in the code, but is it not at least 4 arguable that this falls on the other line because of 5 the point that's made here, that it eroticises sexual 6 harassment. Is that really a message which the Sun 7 wishes to bring across? 8 A. I disagree with that. I don't think it eroticises 9 sexual harassment. I think it's an amusing picture 10 which would neither have offended, I wouldn't think, 11 Pippa Middleton or Prince Harry. 12 Q. But it assumes that there's consent, doesn't it. Why 13 should we assume that? 14 A. Well, I -- look, the picture was supplied to us by 15 Alison Jackson, who, as I say, is a very, very 16 well-respected female artist, photographer, who 17 specialises in these kind of stunted images. 18 Q. The last one -- I mean, you've seen these examples. 19 There isn't time to go through all of them, but if you 20 go to page 9 on the internal numbering, or 54279, 21 example 13. 22 A. Mm. 23 Q. It's a very offensive headline: 24 "Rooney tart's dad has heart attack." 25 You see the point that is fairly may, or I suggest</p> <p style="text-align: center;">Page 126</p>	<p>1 A. Yes. 2 Q. "Burly [and then the name has been redacted] has shocked 3 trucker pals by telling them: 'Call me [then it's 4 obviously the new name].' The lorry driver left 5 workmates stunned when he revealed his sex swap, but 6 insists they're supportive." 7 Then it's "he said". The objection here is twofold: 8 firstly, the inaccuracy, the use of the male pronoun, 9 and secondly the use of the adjective "burly". Why is 10 language like that used in the Sun, Mr Mohan? 11 A. I think maybe looking back, this does look a bit 12 insensitive, but what I would refer you to is in the 13 recent past we've done several similar stories about 14 transgender individuals and -- there was one only last 15 week, in fact, involving a woman called Crystal Warren, 16 and I think that we have improved our reporting in these 17 matters. 18 In fact, after the -- I don't know if you have this, 19 the front page story last week involving Crystal Warren? 20 She actually wrote to me a few days ago, thanking me for 21 the sensitive way the Sun covered the story, and 22 similarly, there was another example last year where we 23 had a piece about a transsexual operation which had 24 taken place on a child's 16th birth and I actually 25 received a letter of thanks from the head of the</p> <p style="text-align: center;">Page 128</p>



<p>1 Mermaids charity who praised the way that we'd reported 2 that. 3 So I think we've improved -- we've raised our game 4 in terms of transgender reporting. 5 Q. So is this your evidence, Mr Mohan, that this sort of 6 piece -- and we can see the before and after 7 photograph -- of course the faces have been pixelated to 8 avoid identification -- is not going to be replicated, 9 is it, in the Sun in future? 10 A. Well, I'm making attempts to do that, yes, in the news 11 pages, yes. 12 Q. How are you doing that? 13 A. In fact, one of the journalists who wrote one of the 14 articles was invited to speak as a transgender 15 conference and I would be quite keen for -- I spoke to 16 you last time about some of the workshops that we've had 17 for journalists about sensitive issues, and I would be 18 quite keen to maybe get one of those groups to come in 19 and talk to my reporters, my staff. 20 LORD JUSTICE LEVESON: But it raises a more over-arching 21 point, whether one's talking about Object or this 22 material. Do you think it would be worthwhile to ensure 23 that whatever mechanism there is for complaints allows 24 the possibility that groups who have concerns about the 25 way in which particular stories are presented, or people</p> <p style="text-align: center;">Page 129</p>	<p>1 LORD JUSTICE LEVESON: But others might be concerned, and 2 there is a debate to be had there. I'm not suggesting 3 that it's in any sense necessarily different from what 4 you can do informally, but it may be more appropriate. 5 I'm asking for your view on this, that there is 6 a mechanism for this that is rather more formal, that 7 those who don't feel that they get perhaps the attention 8 that they otherwise feel they deserve can have 9 a mechanism to voice these concerns. 10 A. Yes, I think it's worth exploring, and as I say, it's 11 certainly something that we've been doing informally 12 anyway. 13 MR JAY: The other one in this submission I would like you 14 to look at, because it's not quite a year old, is 15 page 14. On our numbering, it is 58523. The Sun, 16 25 February 2011. First of all, "Tran or woman?" 17 A. Oh sorry, yes. 18 Q. Do you have any comment on the use of the word "tran", 19 Mr Mohan? 20 A. I don't think this is our greatest moment, to be honest. 21 I think it's actually a valid feature, but some of the 22 language in it is not ideal and it's something that 23 I possibly wouldn't use now. But you have to -- to put 24 it into context, that main image, I believe, is actually 25 a transsexual who was the star of a TV series that was</p> <p style="text-align: center;">Page 131</p>
<p>1 presented, should be able to enter into a dialogue and 2 have a forum through the complaint system to raise that 3 with newspapers? 4 A. I mean, that's really a formalisation of what we're 5 already doing informally at the paper, in terms of -- we 6 had -- the Samaritans group came in last week, for 7 instance, and spoke to the staff. You're talking about 8 a more formalised method? 9 LORD JUSTICE LEVESON: Yes, so that there is no argument 10 that there is a way forward, so these groups feel that 11 there is someone they can go to and generate 12 a discussion so that they can feel they have got their 13 point across to editors of extremely popular and 14 influential newspapers? 15 A. Yes. I mean, I think that does already happen with the 16 PCC, actually, because they'll often bring parties 17 together -- 18 LORD JUSTICE LEVESON: They won't accept complaints. They 19 may do now, but they historically wouldn't accept 20 complaints from groups. It had to be the person who was 21 complaining, and obviously, for example -- and I'm not 22 saying you could mount a complaint about the Page 3 23 idea, but the Page 3 girl won't complain because she's 24 entirely collusive in the exercise. 25 A. Yes.</p> <p style="text-align: center;">Page 130</p>	<p>1 basically based around deceiving a number of male 2 contestants into thinking that he -- that she was a -- 3 that she hadn't been born a man. So there are questions 4 to be asked perhaps in the TV world, as well. 5 Q. Why is that a deception, Mr Mohan? 6 A. All I'm saying -- the TV series -- I don't know if 7 you're familiar with -- was called "There's something 8 about Miriam", and it involved a transsexual who was 9 placed in a house, who was basically put in a house with 10 a number of male contestants, some of whom actually -- 11 did actually -- how shall I put it? 12 Q. I think we get the drift, Mr Mohan? 13 A. -- did kind of team up with her, and I think that 14 a number of those male contestants did actually take 15 legal action against the TV company as a result. 16 Q. On the basis of some sort of deception? 17 A. Yes. 18 Q. Is that the gist of it? If we just have a look at what 19 was said here, arguably it's extremely offensive: 20 "This bevy of beauties are all blessed with good 21 looks, style and figures to die for. Well, most of 22 them, but believe it or not, some of these lovely ladies 23 are actually laddies". 24 Is that acceptable or unacceptable? 25 A. It's not our finest moment, I admit, but I would hope</p> <p style="text-align: center;">Page 132</p>

<p>1 you will see some of the examples I've given of recent 2 times and that would be evidence that we have moved 3 forwards.</p> <p>4 Q. Over the last eleven and a half months or a year? 5 A. Yes.</p> <p>6 Q. Okay. We have the Page 3 example, Mr Mohan, you have 7 the examples which Object refer to, and I've taken you 8 to, and we have the Trans Media Watch example. I'm not 9 saying they fall on a spectrum. Do you see those 10 examples as being, in effect, the same or do you see 11 differences between them? If so, what are the 12 differences?</p> <p>13 A. Well, I think Page 3 is a matter of taste. Yeah, 14 obviously I think with someone with transgender issues, 15 we've crossed line in terms of the code, and as you 16 know, there was a PCC complaint upheld against us by -- 17 which was taken by a transgender group, which we talked 18 about last time.</p> <p>19 What I would say is that you have to look at this in 20 context. I mean, since I last appeared at the Inquiry, 21 we've probably published more than 8,000 articles in the 22 paper. We publish more than 100,000 a year. I've 23 probably been editor overseeing over 250,000 articles a 24 year. These do represent quite a small percentage.</p> <p>25 Q. The sort of material that Object have placed before the Page 133</p>	<p>1 details about a live Coronation Street show which was 2 where guests and stars were being subject to a full body 3 search, and the information that we received was that 4 this was related to a fear that -- of an Al Qaeda 5 threat. There was a quote from a police spokesman who 6 said this is a public high profile event. The risk is 7 consistent with the UK terror threat, which is currently 8 severe. ITV have taken on a private security firm and 9 our officers will assist them.</p> <p>10 Clearly our source was correct on a lot of matters, 11 but not on the Al Qaeda element, but I would say that we 12 corrected that very, very quickly as a result.</p> <p>13 Again, we do make mistakes. We publish over 100,000 14 articles a year. When those mistakes are made, 15 I attempt to correct then as quickly as possible and 16 learn from them.</p> <p>17 Q. Under tab 24 there's a quote from the Greater Manchester 18 police. They made it clear that: 19 "We've not been made aware of any threat from 20 Al Qaeda or other proscribed organisation. Quite 21 simply, Grenada approached the Greater Manchester police 22 to inform us they're employing a private security firm 23 to help ensure that tonight's programme went ahead 24 without outside interference. As part of their 25 operation they asked for police assistance and we agreed Page 135</p>
<p>1 Inquiry, which is only looking at a one-week period, 14 2 to 20 November 2011, are you saying that that was not 3 representative of the sort of pieces which one sees in 4 the Sun every day, frankly?</p> <p>5 A. Well, a number of them I don't believe are in bad taste. 6 There was one you didn't refer to, which has a photo of 7 three female jockeys and in the submission it says that 8 we would never picture male sports stars in that way, 9 and I disagree with that, because if you look at -- you 10 know, you can barely walk down the street without seeing 11 a billboard of David Beckham in his underwear, and 12 similarly Cristiano Ronaldo has posed in his underwear 13 and we've carried those photographs also, so I do 14 disagree with a number of those submission.</p> <p>15 Q. Yes, but I was -- whether I was making an evaluation or 16 not, it's not for me to say, but I was careful to take 17 you to some of them and not all of them, Mr Mohan.</p> <p>18 Can I move off that issue to another one. One piece 19 which has been drawn to our attention, the "Al Qaeda 20 Corrie threat", which is items 22 and 23 in this bundle. 21 This surrounds fears surrounding the filming of 22 Coronation Street that -- Al Qaeda was targeting them. 23 There was no basis for this story at all, was there, 24 Mr Mohan?</p> <p>25 A. I believe we were contacted by a source which had Page 134</p>	<p>1 to deploy a very small number of officers." 2 So what you were doing in this headline was 3 sensationalising an entirely mundane issue for maximum 4 effect, weren't you?</p> <p>5 A. I don't think it's a mundane issue that the cast of 6 Coronation Street were subject to a full body search. 7 I think that's highly unusual. But yes, the Al-Qaeda 8 element of it was wrong and we corrected the story 9 pretty swiftly.</p> <p>10 Q. May I ask you finally, please -- I'm not going to cover 11 every single matter, although there are two other 12 matters actually.</p> <p>13 The first relates to the Gordon Brown cystic 14 fibrosis story, if I can put it in those terms. The 15 original story was published in 2006 when you weren't 16 editor. The matter arose again, I think, last year when 17 your position was or your paper's position was that the 18 publication of that story was in the public interest 19 because a member of the public had provided you with the 20 story rather than through any unlawful means. Is that 21 a fair summary of the position?</p> <p>22 A. Can you repeat that?</p> <p>23 Q. Yes.</p> <p>24 A. Because I think there's another element to it.</p> <p>25 Q. Right. The original story was in 2006; is that correct? Page 136</p>

<p>1 A. Yes.</p> <p>2 Q. When you weren't editor. The matter blew up again last</p> <p>3 year, and the Sun published an article which said that</p> <p>4 a member of the public had provided the information</p> <p>5 relating to the child and that the Sun was denying that</p> <p>6 the article -- or rather, the underlying evidence -- had</p> <p>7 been obtained unlawfully. Is that correct?</p> <p>8 A. Yes, but it was also addressing the fact that I'd</p> <p>9 researched the background to the story and -- there are</p> <p>10 probably other witnesses who you might be seeing at</p> <p>11 a later date who might be able to help you further on</p> <p>12 this, but my information was that consent had been given</p> <p>13 to run this story.</p> <p>14 Q. Yes, well, that, I think, is a matter which is hotly</p> <p>15 disputed, isn't it? If consent had been given for the</p> <p>16 story, obviously certain consequences would flow, but if</p> <p>17 consent had not been given for the story, what was the</p> <p>18 public interest in publishing it, Mr Mohan?</p> <p>19 A. I don't think the story would have been published</p> <p>20 without consent. I wouldn't have published it without</p> <p>21 consent.</p> <p>22 Q. So does it boil down to this: it's really an issue of</p> <p>23 fact, which is in dispute and may have to be resolved in</p> <p>24 due course, as to whether consent was given back in</p> <p>25 2006? Have I correctly understood it?</p> <p style="text-align: center;">Page 137</p>	<p>1 consent-gathering mechanism was.</p> <p>2 A. (Nods head)</p> <p>3 LORD JUSTICE LEVESON: That may be the issue.</p> <p>4 MR JAY: Have you been able to investigate the circumstances</p> <p>5 in which consent was allegedly obtained, Mr Mohan?</p> <p>6 A. I spoke to journalists who were involved in the original</p> <p>7 story, and they indicated to me that consent had been</p> <p>8 given. There is a quote in the original story from</p> <p>9 a Treasury spokesman, and I don't think that would have</p> <p>10 been provided if consent had not been given.</p> <p>11 Q. That may be may not be something we can pursue further.</p> <p>12 We know -- and this is the last point, Mr Mohan.</p> <p>13 How far we can go with this point, we will see. We know</p> <p>14 that at least four journalists from the Sun were</p> <p>15 arrested under Operation Elveden on 28 January, which</p> <p>16 was eleven days ago. It was a Saturday. Were you aware</p> <p>17 of that operation before 28 January?</p> <p>18 A. That the arrests were to take place the following day?</p> <p>19 Q. Yes.</p> <p>20 A. No, I wasn't.</p> <p>21 Q. So when were you first made aware that these arrests had</p> <p>22 taken place or were going to take place?</p> <p>23 A. When -- I was contacted and told that my office were</p> <p>24 trying to get hold of me on the Saturday morning.</p> <p>25 Q. So is it your evidence that you had no advance notice of</p> <p style="text-align: center;">Page 139</p>
<p>1 A. Although -- one of the central allegations was</p> <p>2 obviously, as you've said, that the Sun had illegally</p> <p>3 obtained this information by hacking medical records,</p> <p>4 and the source, who I obviously don't want to attempt to</p> <p>5 identify -- and we were very careful to conceal that</p> <p>6 individual's identity -- he swore an affidavit saying</p> <p>7 that that's not how the information had been obtained.</p> <p>8 Q. Yes. Let's assume that that's correct, namely that the</p> <p>9 information was not obtained illegally, it was obtained</p> <p>10 by lawful means via a source. You would not have</p> <p>11 published this story unless you were sure that consent</p> <p>12 had been given by the parents? Does that summarise your</p> <p>13 evidence?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. Is it implicit in that that you would take the</p> <p>16 view that even if the information had been obtained</p> <p>17 entirely lawfully, it was intrusive and not in the</p> <p>18 public interest to publish the story without consent?</p> <p>19 A. This specific story, I would not have run without</p> <p>20 consent.</p> <p>21 Q. Your reasons being?</p> <p>22 A. Well, it's obviously an extremely sensitive issue.</p> <p>23 Q. Okay.</p> <p>24 LORD JUSTICE LEVESON: It's a medical matter concerning</p> <p>25 a child, so the question becomes how robust your</p> <p style="text-align: center;">Page 138</p>	<p>1 this?</p> <p>2 A. I wasn't told that the arrests were going to take place</p> <p>3 on the Saturday, no, absolutely not.</p> <p>4 Q. But were you aware that arrests were going to take place</p> <p>5 on a certain day, although the exact day was not known</p> <p>6 to you?</p> <p>7 A. No. I think that I have to be extremely careful here,</p> <p>8 because obviously this is a live police investigation.</p> <p>9 Q. So is it your clear evidence that the first time you</p> <p>10 were made aware of the arrests was after they had</p> <p>11 happened?</p> <p>12 A. Yes. I actually was -- I actually spoke to my office,</p> <p>13 who informed me at -- I can't remember the time.</p> <p>14 I think it was about maybe 9.15 am.</p> <p>15 MR JAY: Okay. I was asked to put that point to you and</p> <p>16 I have taken it as far as I think I can go and I've</p> <p>17 overrun by one minute.</p> <p>18 LORD JUSTICE LEVESON: Thank you very much indeed.</p> <p>19 Mr Mohan, thank you very much indeed for returning</p> <p>20 and for dealing with these other matters. I'm sure you</p> <p>21 would agree that it's sensible that we get your input on</p> <p>22 issues that have been raised during the course of the</p> <p>23 Inquiry.</p> <p>24 A. Yes.</p> <p>25 LORD JUSTICE LEVESON: I thank everybody for their patience</p> <p style="text-align: center;">Page 140</p>

35 (Pages 137 to 140)

1 yet again. Tomorrow morning, 10 o'clock. Thank you.  
2 (5.31 pm)  
3 (The hearing adjourned until 10 o'clock the following day)  
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