

<p>1 Thursday, 9 February 2012</p> <p>2 (1.55 pm)</p> <p>3 MS PATRY HOSKINS: Ms Stanistreet, before we broke for</p> <p>4 lunch, we were about to turn to exhibit 1 of your second</p> <p>5 witness statement. Before we do that, I want to touch</p> <p>6 on two paragraphs of the witness statement itself,</p> <p>7 paragraphs 23 and 26. Have a quick look at those.</p> <p>8 I want to touch on the reasons why these journalists</p> <p>9 have remained anonymous. Paragraph 23:</p> <p>10 "I asked all journalists I spoke to whether they</p> <p>11 would be willing to speak publicly and on the record</p> <p>12 about their experiences. In an ideal world, this of</p> <p>13 course would be the best way of the Inquiry being able</p> <p>14 to learn first hand the reality of working life for many</p> <p>15 journalists. However, the response was unanimous that</p> <p>16 speaking out publicly was not an option."</p> <p>17 Can I summarise your evidence as this: you did</p> <p>18 actually try to see whether any of them would -- any</p> <p>19 individually would speak out publicly but the answer was</p> <p>20 no in every case?</p> <p>21 A. That's right. And of course in the circular that I had</p> <p>22 disseminated, I did say I was prepared to take the</p> <p>23 experiences in confidence as well, and that's the basis</p> <p>24 on which many people replied. But yes, obviously the</p> <p>25 ideal would be that journalists could come here and</p> <p style="text-align: center;">Page 1</p>	<p>1 of this Inquiry and in the process of trying to</p> <p>2 encourage people to talk openly or, if not, in</p> <p>3 confidence through me, and some of the testimony from</p> <p>4 those journalists is here today, but there's testimony</p> <p>5 that's not because people were not even -- some people</p> <p>6 were not even prepared or they didn't even feel able to</p> <p>7 speak in confidence to me, and they felt too scared</p> <p>8 about their experiences being shared through the Inquiry</p> <p>9 because they really were petrified that actually</p> <p>10 somebody would be able to identify them and that that</p> <p>11 would have negative repercussions on their career and on</p> <p>12 their future prospects in journalism.</p> <p>13 So I know that these are not isolated examples of</p> <p>14 unpleasantness in a workplace or isolated examples of</p> <p>15 unethical practice. It's also, of course, many of the</p> <p>16 officials who work for me deal with personal cases of</p> <p>17 journalists on a daily basis, and the issues that have</p> <p>18 been raised here in this testimony are reflected in many</p> <p>19 of the cases the union takes up all the time. Sadly,</p> <p>20 it's a sad fact that actually these problems are very</p> <p>21 prevalent within the industry today.</p> <p>22 LORD JUSTICE LEVESON: We have to be rather careful, haven't</p> <p>23 we, Ms Stanistreet, to distinguish between what I might</p> <p>24 describe as employment-related issues and public-facing</p> <p>25 issues, because there is a difference.</p> <p style="text-align: center;">Page 3</p>
<p>1 could talk openly and honestly about their experiences</p> <p>2 of life in the industry, and sadly that's just not an</p> <p>3 option.</p> <p>4 Q. The reasons they gave you, if you continue the same</p> <p>5 paragraph, were: fear of consequences, the reaction of</p> <p>6 their employers, the fear of never being able to work in</p> <p>7 the industry again, punishment for speaking out, worried</p> <p>8 about career blight, and the overwhelming fear that</p> <p>9 their reputations would be trashed in public by powerful</p> <p>10 media groups. Then you say this:</p> <p>11 "Those working in precarious employment relying on</p> <p>12 casual shifts of freelance work were particularly</p> <p>13 threatened about the immediate consequences of giving</p> <p>14 evidence openly. These fears were expressed vehemently</p> <p>15 by all."</p> <p>16 Then you go on to say at paragraph 26, essentially</p> <p>17 you give your comment on whether or not you think that</p> <p>18 the testimony you report can be dismissed as the gripes</p> <p>19 of an individual. Perhaps you could just elaborate</p> <p>20 a little on that. You conclude that these are not rogue</p> <p>21 reporters with individual gripes against individual</p> <p>22 newspapers but they present a coherent picture of what's</p> <p>23 going on in the industry. How did you come to that</p> <p>24 conclusion?</p> <p>25 A. Obviously I've spoken to many journalists in the course</p> <p style="text-align: center;">Page 2</p>	<p>1 A. Well, there is a difference, but I'm not talking about</p> <p>2 grievances, about industrial matters in a work</p> <p>3 environment. I'm talking about officials who deal with</p> <p>4 cases of bullying, of sexual harassment, of sexism</p> <p>5 within the workplace, of journalists who are put under</p> <p>6 intolerable pressure to deliver by bosses who are</p> <p>7 bullying them routinely. So they're also cases that</p> <p>8 aren't directly related to in the testimony but I know</p> <p>9 exist and the officials who work for me know exist</p> <p>10 within the broader industry, and that's why I think it's</p> <p>11 really important to state, and I'm absolutely convinced</p> <p>12 of the fact, that these are not 12 individual instances</p> <p>13 of abuses; these are a much greater collective</p> <p>14 experience of far too many journalists.</p> <p>15 LORD JUSTICE LEVESON: Well, of course there comes a time</p> <p>16 when it's very difficult for me to turn what is</p> <p>17 a qualitative exercise into a quantitative exercise.</p> <p>18 A. Yes.</p> <p>19 LORD JUSTICE LEVESON: I think I've said that in the last</p> <p>20 ruling that I gave.</p> <p>21 MS PATRY HOSKINS: What we're going to do now, please, is go</p> <p>22 through your exhibit to your second witness statement.</p> <p>23 We're going to look at the 12 examples in summary form,</p> <p>24 if we can. What I will do is I'll paraphrase each</p> <p>25 testimony and if there's anything that you think I've</p> <p style="text-align: center;">Page 4</p>

<p>1 missed out that's particularly relevant, then please 2 draw it to our attention. 3 Before I do that, though, two points: first of all, 4 is it correct to say that all the journalists whose 5 testimony is represented here are still working in the 6 industry? 7 A. Yes, that's true. 8 Q. And secondly, you'll see that the exhibit has been 9 significantly redacted to remove references to names and 10 references to names of newspapers and also particular 11 incidents have been redacted, but the News of the World 12 remains in. Why has that approach been taken? 13 LORD JUSTICE LEVESON: Well, I hope it's been taken because 14 that's the approach I directed. 15 MS PATRY HOSKINS: Yes. 16 A. Yes, I haven't made the redactions, obviously, it's the 17 Inquiry team who have made these redactions. 18 LORD JUSTICE LEVESON: Yes. 19 MS PATRY HOSKINS: I just wanted to get that across. 20 We'll start with journalist number one. 21 First of all, I should say that the exhibit is split 22 into several parts in the sense that different 23 categories of behaviour have been identified, and the 24 first is bullying. We'll see that at the top of the 25 first page. A number of journalists speak about Page 5</p>	<p>1 There's a lot of that about at the moment." 2 Paraphrasing, that's his experience at News of the 3 World. At 1.6 he says: 4 "But the reality is that what happened at the News 5 of the World is not an exception. The culture is macho, 6 it pervades the industry. I worked at [another 7 title] -- it's absolutely petrifying there. They work 8 you like dogs. The expectations for a reporter are 9 ridiculous. There are always unrealistic demands." 10 Again he makes the same point that if you do not 11 achieve, you are made to feel like a failure and you are 12 given a number of impossible to achieve tasks. 13 Then goes on to say: 14 "The culture is competitive, deliberately so. News 15 editors throw reporters onto the same story, everyone's 16 terrified of putting a foot wrong." 17 He says at the end of that paragraph: 18 "Even when you think you've done a great job, 19 there's no reward or appreciation." 20 He talks about the levels of paranoia and pressure 21 and explained that applied not only to casual reporters 22 but to staff reporters as well, but as a freelance, he 23 explains, there's no security at all. Halfway through 24 paragraph 1.8 he says this: 25 "You worked long hours. You had to deliver, there Page 7</p>
<p>1 bullying. The first journalist is a journalist of 30 2 years' experience across the industry, in recent years 3 working as a casual reporter on a number of national 4 titles. 5 This journalist, I'll call him or her journalist 6 number one, worked for the News of the World for over 7 three years and says quite a number of things about the 8 News of the World. Can I just paraphrase them in this 9 way: first he says that -- when I say "he", I will mean 10 he or she, it's just easier than saying he or she 11 continuously. 12 First of all, he says there was tremendous pressure 13 at News of the World and that he was given absolutely 14 impossible tasks and was told that if he couldn't 15 achieve them essentially that he was a failure. He then 16 talks about a number of individuals and we'll just have 17 to skip over that because those names are redacted. 18 Over the page at 1.5, explains that there was a real 19 military chain of command, that you did what you were 20 told when you were told, and it took a pretty brave 21 person to take a stand. Life was made miserable, and he 22 goes on to say: 23 "... you'd quickly find yourself out of work ... 24 You grit your teeth and put up with it. If you want 25 a career in the future, you shut up and you keep quiet. Page 6</p>	<p>1 was no mercy. The money's terrible. Freelancers are 2 expected to use their own laptop, mobile and car. It's 3 impossible to even get your expenses repaid sometimes. 4 You are denied even the most basic tools of the trade. 5 You're expected to pull stories out of the bag just like 6 the staffers. You couldn't say anything in fear of 7 losing your work." 8 He then goes on to say, still I presume talking 9 about freelancers: 10 "There's been a creation of a second, third class 11 culture of journalists. People on staff contracts, 12 sometimes doing next to nothing, then there's people 13 working really hard, with no security or contract, 14 getting paid next to nothing." 15 And explains that he himself is experienced and 16 skilled but still made to feel that he's on a very low 17 level. 18 At 1.10 onwards he explains why it's impossible for 19 him to speak out. He says: 20 "Being pragmatic, there is that fear that if you do 21 what Sean (Hoare) did or Paul McMullan, you don't work 22 in the industry again. Their reputations have been 23 trashed. But they were quite brave in doing what they 24 did, in telling the truth. 25 Can I pause there and ask you a question: was his Page 8</p>

<p>1 evidence to you -- obviously him or her -- you heard him 2 or her giving you this evidence, was the evidence there 3 that he believed Sean Hoare and Paul McMullan to have 4 spoken the truth? 5 A. There was no physical evidence apart from that is this 6 journalist's fervent belief, that everyone they have 7 witnessed leads them to believe that actually what we've 8 heard from Paul McMullan, what Sean Hoare had reported 9 in the interviews that he gave, that they were being 10 honest and open about the reality of working life in 11 that newspaper. 12 Q. There's two final points which are important to make. 13 In 1.11 he says: 14 "What's striking is that there's nowhere to turn. 15 I've always been a member of the NUJ but in [X place] 16 the union's not allowed in. There was no sense that 17 there was anyone internally who'd help." 18 I'll come on to ask you about unions in other 19 organisations in due course. 20 The other point is at 1.12: 21 "There is a real culture of journalists like myself 22 feeling utterly betrayed at the moment, we've been 23 vilified at Leveson, within the public domain. But 24 we've also been betrayed by the newspaper management." 25 Can you explain as best you can why there was an</p> <p style="text-align: center;">Page 9</p>	<p>1 I share. I've said more than once, and I'm happy to 2 repeat, that I consider a great majority of the 3 journalism in this country from all areas is very much 4 in the public interest, and a very great credit. That's 5 not to say that there isn't some in respect of whom I am 6 likely to take, given the evidence, a different view. 7 But I am keen to make it clear to you and just in 8 response to this -- and it deals with a point that was 9 made the other day -- that the mere fact that we are 10 focusing on examples of poor behaviour or poor ethical 11 decision-making shouldn't be taken as a view that this 12 is what I think of the world. 13 When Dame Janet Smith conducted the inquiry into the 14 regulation of the medical profession following the 15 activities of Dr Harold Shipman, nobody suggested that 16 there were other doctors out there who were behaving as 17 he did. Inevitably an inquiry of this nature requires 18 focus on the areas that suggest change is necessary, but 19 it's important that the context is provided, and if that 20 reassures this particular journalist, and indeed 21 everybody with whom this Inquiry is concerned, then I am 22 pleased to give that reassurance. 23 MS PATRY HOSKINS: Ms Stanistreet, still under the heading 24 bullying, we turn to journalist number two. This is 25 a journalist with less experience, six years'</p> <p style="text-align: center;">Page 11</p>
<p>1 expression of feeling that journalists like him had been 2 betrayed? 3 A. Because there's a very real feeling amongst journalists 4 at the moment that ever since this scandal blew up, the 5 News of the World and News International as one 6 organisation did all it could for a long time to peddle 7 an untruth that this was simply the act of a rogue 8 reporter. We all know now that that's not true, and 9 that since then and in recent months, there's been 10 a deliberate attempt by major media organisations, by 11 the bosses within the industry, to pin the blame on 12 individual journalists and to scapegoat ordinary working 13 journalists as somehow being to blame for these 14 unethical abusive practices, that somehow they knew 15 nothing about what was going on in their own newsrooms, 16 and to any working journalist, that's fanciful, not 17 true. Editors on national newspapers particularly are 18 about as hands-on as they get. 19 So there is a real prevalent feeling of betrayal 20 amongst journalists, particularly those who have given 21 their entire career and working life to particular news 22 groups. 23 LORD JUSTICE LEVESON: I wouldn't want it to be thought that 24 the conclusion that this particular journalist expresses 25 about journalists and journalism in general is one that</p> <p style="text-align: center;">Page 10</p>	<p>1 experience, who explains at 1.13 that although he is 2 still doing some freelance work, he's pretty much 3 decided he doesn't want to be a journalist any more now, 4 after what he has experienced. 5 He also spent some time at the News of the World. 6 That's apparent from 1.14, and explains again, as the 7 previous journalist did, that he experienced pretty much 8 constant bullying, and he gives some specific examples 9 about emails being sent behind his back, comments being 10 made about weight and then at 1.15 gives some other 11 examples about young reporters being made to wear stupid 12 costumes and parade around the office. Gives the 13 specific example of a reporter having to go out 14 addressed head to toe in meat for a Lady Gaga story, and 15 explains that he considers the atmosphere to be sexist 16 and degrading. 17 Explains at 1.16 that simply if you don't do the job 18 then you've not got a contract, you're existing on 19 freelance shifts, and explains how quickly someone can 20 lose their position if they don't toe the line. 21 Again the journalist touches on some of the previous 22 aspects: unrealistic deadlines, being shouted at, being 23 made to be a failure if they did not achieve what they 24 were asked to and then makes the same point about unions 25 at 1.19 also:</p> <p style="text-align: center;">Page 12</p>

<p>1 "There's a staff association, NISA, but you weren't 2 allowed to go along if you were a casual and you 3 couldn't raise stuff like bullying with them anyway. 4 You know they are there to serve the company, not an 5 individual journalist's interests. They don't even let 6 the NUJ into the building." 7 I'm going to go on to ask you about that when I'm 8 looking at your third witness statement. I just want to 9 touch on it for the moment. He then explains at 1.20 10 the very significant effect that all of this has had on 11 them personally. 12 We then turn to the second heading, the heading of 13 "Stress", and we turn to journalist -- you touch on the 14 evidence of Matt Driscoll, which we've heard, and then 15 you turn to the third journalist, someone who has more 16 than 15 years' experience. 17 Again this person was at the News of the World and 18 explains some of the same things: tough and unforgiving 19 workplace, mistakes not being tolerated, and goes on to 20 say at the end of 2.1 that three or four staff suffered 21 physical collapses at the office, almost certainly to 22 some extent as a result of the stress. At 2.2 makes a 23 point about Mr Goodman. The journalist says this: 24 "Mr Goodman enjoyed a high salary and big title as 25 royal editor and came in for a lot of flak. He'd be</p> <p style="text-align: center;">Page 13</p>	<p>1 whether or not the dark arts were practised just across 2 a certain type of title or across the whole range? 3 A. This journalist's testimony covers time spent on 4 mid-markets, on red tops and in broadsheets. 5 Q. And this is evidence to the effect that the dark arts 6 were practised in all of those? 7 A. Yes. 8 Q. I've been asked to ask you a question about journalist 9 four. Do his experiences as described of phone hacking 10 to obtain confidential information relate to his work in 11 broadcasting only? 12 A. No, to work in the range of newspapers and newspaper 13 groups that I've just outlined. 14 Q. All right. At 4.1 this gentleman or woman, he or she 15 explains why he cannot give evidence publicly and why 16 he's decided to submit his evidence anonymously through 17 you. He explains that he first became aware of 18 journalistic practices during the 1980s, and on that 19 occasion what he learned was that a journalist regularly 20 employed the services of a private investigator. Then 21 journalist number four came to work closely with that 22 particular journalist and he shared many of his earlier 23 exploits with journalist number four. 24 He then met the private investigator and then worked 25 with him on a number of stories. The private</p> <p style="text-align: center;">Page 15</p>
<p>1 publicly lambasted for a lack of stories or ideas in 2 conference, probably more than anyone. It could be 3 embarrassing for everyone when it happened publicly, as 4 it sometimes did, in news conference in front of 20 to 5 25 other people." 6 Then goes on to say at the end of that paragraph: 7 "I am not suggesting this excuses his later actions, 8 far from it, but there is no doubt in my mind that he 9 was under intense pressure to deliver." 10 Again he then makes a point about the NISA at 2.3, 11 which we don't need to repeat. 12 We then turn to the third heading, which is "Hacking 13 and the dark arts", and we turn there to journalist 14 number four. This is a journalist with over 32 years' 15 experience in local and regional newspapers before 16 moving on titles, broadsheet and tabloid, across 17 Fleet Street and then into broadcasting. As far as 18 you're aware, is that person still working in 19 broadcasting? 20 A. Still working in newspapers and some broadcasting as 21 well. 22 Q. This person goes on to describe in quite a lot of detail 23 the dark arts that are practised. Can you give us 24 a feel -- you absolutely cannot name any names or any 25 names of any newspapers, but can you give us a feel for</p> <p style="text-align: center;">Page 14</p>	<p>1 investigator, he says, was able to provide surveillance 2 services which involved the bugging of homes and 3 business premises as well as recordings from landline 4 telephones, because of course this was before widespread 5 mobile use, as he explains. 6 He explains that the private investigator was always 7 paid cash delivered in envelopes and invariably 8 disguised in a rolled-up newspaper. 9 "I saw the senior journalist carrying the cash", he 10 says, "but never witnessed the actual handing over which 11 either happened on my blind side or else when I was not 12 present." 13 He then goes on to explain the variety of targets 14 that were targeted, which we don't need to go through, 15 but at 4.5 makes clear that the same investigator was 16 able to furnish the journalists in question, including 17 journalist number four, with police national computer 18 checks when they sought to learn about criminal 19 convictions and cautions, and was also able to access 20 social security records and could frequently provide the 21 most up-to-date home addresses for people. This was 22 invaluable if legitimate searches failed to find them. 23 We see that at the end of 4.5. 24 A. Mm. 25 Q. He then goes on, if we move to 4.8, to say:</p> <p style="text-align: center;">Page 16</p>

4 (Pages 13 to 16)

<p>1 "Initially the use of such techniques wasn't 2 widespread in the newsrooms but instead it was 3 restricted at that time to a few older journalists who 4 had an investigative bent. This was also the situation 5 in the other Fleet Street newsroom which I have worked 6 in. It was known by all the staff reporters and some of 7 the regular freelancers which journalist had the 8 wherewithal to obtain things like ex-directory phone 9 numbers, PNC details and/or medical records." 10 He then goes on to describe his own personal 11 circumstances, which I don't think we need to go into, 12 but he concludes at 4.11 that he has no reason to think 13 that any of this changed since he left that particular 14 title and many of the very best practitioners of the 15 so-called dark arts continued to work there, he says. 16 He then explains that he moved to another title, we 17 don't know what it was, where the contrast was that the 18 news desk and other senior editorial executives spoke 19 openly about the use of such methods. That's 4.12. 20 Much more of an open secret. 21 Then goes on to say at 4.13 that those who objected 22 were routinely abused verbally publicly. Goes on to 23 explain that there might be other sanctions if you 24 didn't toe the line. He then gives other specific 25 examples and concludes that: Page 17</p>	<p>1 abroad. 2 LORD JUSTICE LEVESON: I don't think that's in the vain hope 3 of not doing anything wrong. I think it's rather 4 different. 5 MS PATRY HOSKINS: To deter any police investigation. 6 LORD JUSTICE LEVESON: I'm not quite sure what using 7 a Trojan computer is, if it isn't hacking. All right. 8 MS PATRY HOSKINS: He concludes: 9 "I know from direct experience that [X] have also 10 used Trojan programs and I have it from good first-hand 11 information that the News of the World also utilised 12 such techniques." 13 Am I right in saying "I have it from good first-hand 14 information" that's hearsay evidence, isn't it? 15 A. Yes. 16 Q. There wasn't anything else that he could provide you 17 with? 18 A. No. 19 Q. Still on the same subject of the dark arts we have the 20 fifth journalist who has more than 25 years' experience 21 across many national newspaper titles including many 22 years at the News of the World. We're not going to 23 touch upon the bullying culture again, save to note that 24 it's been repeated by this journalist and he also refers 25 at 4.20 to the immense pressure which he faced again. Page 19</p>
<p>1 "A small but significant number of those reporters 2 responsible for creating that climate or carrying out 3 the dark arts have subsequently been promoted both 4 within [title] and some to the most senior editorial 5 positions in newspapers elsewhere in Fleet Street." 6 He admits himself at 4.16 that he stole, bribed and 7 cheated to obtain information, but what he objects to is 8 the indiscriminate way this was carried out, in 9 situations where there was a spurious public interest 10 justification, and this is why he left and went 11 freelance. 12 The only other thing we need to add is 4.18. While 13 freelancing he says he learned from serving police 14 officers about a technique used to help convict 15 paedophiles which involved placing a computer program 16 into a computer in order to discover what was being 17 stored on the hard drive. He quickly realised its 18 potential for news gathering and over a period of about 19 six months acquired the ability from computer 20 programmers how to construct a Trojan computer program. 21 After a period of trial and error he found he could 22 obtain confidential information from this method better 23 than from bugging, hacking or theft and bribery. He 24 says in the vain hope that he might not be doing 25 anything wrong, he targeted only people who worked Page 18</p>	<p>1 We don't need to read that out. 2 At 4.21 and 4.22 and 4.23 he explains that there 3 were individuals at the newspaper who were obviously 4 very difficult to deal with. Talks about ritual 5 humiliation and so on. 6 Then at 4.26 on page 11, he explains that an example 7 of bullying or pressure, he would get calls on 8 a Saturday night to say get on the plane at 7 am the 9 next morning. When one girl complained of all the calls 10 she was getting out of hours she got more calls every 11 single week and it drove her out, she was incredibly 12 upset. 13 He makes this point at the end of 4.26: 14 "The in-house staff association NISA, they're nice 15 people but what are they going to do if you complain 16 about your boss bullying you? He'd have denied it, 17 they'd pay you off, you'd lose your job. Where would 18 you go when there aren't many jobs in Fleet Street any 19 more?" 20 I think that's all we need to touch upon, unless 21 there's anything in that particular statement you want 22 to draw to the Inquiry's attention. We'll move on to 23 journalist number six. 24 A. I think this particular testimony does really underline 25 what a dysfunctional atmosphere working in this newsroom Page 20</p>

<p>1 was in terms of the very competitive approach, the way 2 that colleagues were encouraged to, as this journalist 3 says, shaft each other. It certainly made for very 4 uncomfortable listening to me interviewing this person, 5 the extent of the bullying and the unpleasantness that 6 people were expected to put up with day on day. I've 7 dealt with many, many cases of journalists in lots of 8 different circumstances, but I still found this really a 9 very shocking piece of testimony.</p> <p>10 Q. Journalist number six, who is a freelance photographer 11 of over 15 years' experience. I just wanted to give one 12 example of one particular event. This is a News of 13 the World journalist who took the mobile number given to 14 him or her by a homeless man and then said "Wait 15 a minute" -- I paraphrase 4.35 -- called the number, 16 gave that person on the other end of the line the mobile 17 number that she had just been given, then within 15 18 minutes somebody called back and gave the name and 19 address of the woman who the phone was registered to. 20 And the journalist notes that this information could 21 only have been obtained from a policeman or someone 22 working for a mobile phone company, but it was unlikely 23 that it was the mobile phone company because the 24 homeless man was never asked which network he was on. 25 There's nothing else we need to take from that.</p> <p style="text-align: center;">Page 21</p>	<p>1 The only other thing that we need to touch on in 2 relation to this journalist is paragraph 7.10, which is 3 about making the story stand up. The journalist says 4 this: 5 "Time and time again when I was faced with a dubious 6 story or one that was proving difficult to substantiate 7 I was instructed to just put in some bystander quotes. 8 Again we received verbal commands on the way those 9 stories should run, to the extent of: put in 'an 10 onlooker said this' or '[X]' in the third paragraph. 11 There was no such onlooker and no direct quotes." 12 Going on from there: 13 "While I never and was never instructed to make up 14 a story from scratch, I did add substantiating quotes, 15 either under direct instruction from the news editor or 16 just to sensationalise the story as per instruction -- 17 and these were often entirely made up. I was by no 18 means the only person doing so -- and often, if I did 19 not incorporate any sexier substantiating quotes, 20 I found they had magically appeared in my article by the 21 final edit." 22 Anything else you wanted to add to that before we 23 move on to journalist number eight? 24 A. No, I think it paints a very strong picture of life in 25 that newsroom.</p> <p style="text-align: center;">Page 23</p>
<p>1 We then turn to the heading of "Unethical practice" 2 and journalist number seven. This is a reporter who 3 complains at length about their newspaper's continued 4 negative coverage of Islam and the Xenophobic agenda of 5 the newspaper. I don't think we need to read any of 6 this out. Essentially this journalist gives a number of 7 examples of things that they were required to do, 8 stories that they were required to write, and makes 9 clear that whenever they complained or removed parts of 10 the articles that they were asked to write, they would 11 somehow find that bits had found their way back into the 12 article when they were published, and other such -- 13 I don't need to read out every single example.</p> <p>14 At 7.6 the journalist makes clear that when the 15 journalist complained or asked for their byline to be 16 removed from the story, the journalist was portrayed as 17 the token lefty in the newsroom, and then after that 18 this particular journalist was targeted to produce the 19 highest number of anti-Muslim stories. Despite the fact 20 that this journalist never once put forward a story like 21 that. The journalist quite forcefully described being 22 in tears at being asked to do this, but nevertheless the 23 behaviour continuing.</p> <p>24 The journalist concludes by saying essentially that 25 they resigned.</p> <p style="text-align: center;">Page 22</p>	<p>1 Q. Journalist number eight also has concerns about the 2 reporting on immigration and asylum and saying it's 3 simply not done in a neutral, even-handed way. I don't 4 think there's anything -- unless there's something you 5 particularly want to draw to our attention, I don't 6 think there's anything we need to say.</p> <p>7 Number nine is a journalist of over 20 years' 8 experience working across a number of national 9 newspapers and this is about a proprietor. This 10 journalist wants to make it clear that this particular 11 proprietor, more than any other proprietor that this 12 journalist knows, cared little for journalistic ethics: 13 "He expected reporters to write stories that suited 14 him when it suited him, for example negative stories on 15 [X] on demand or anti-asylum stories and headlines 16 whenever it suited. His intervention made it virtually 17 impossible for anyone to resist him individually, and 18 when as a union we did this and went to the PCC it was 19 useless. I'm not sure that his editorial interference 20 was or is any greater than some others, he was just very 21 brazen about it. Once he came up to my desk and 22 demanded a particular angle on something or else he did 23 it for the editor." 24 Journalist number ten is a journalist of 20 years 25 working as a freelance and staffer in national and</p> <p style="text-align: center;">Page 24</p>

<p>1 regional newspapers as well. At 7.22 the journalist 2 makes clear from the outset that he was never involved 3 in investigative methods which might contravene the NUJ 4 ethical standards, but he witnessed a worrying erosion 5 of those standards in almost every newsroom. Explains 6 that in some detail, which we don't need to go through. 7 Is there anything else you would like to draw to our 8 attention? 9 A. No, it's fine. 10 Q. The last two journalists deal with the issue of 11 casualisation and the first is journalist number eleven, 12 a freelance journalist of 25 years working across the 13 local and national press and magazine sectors. This 14 journalist explained that when they "... refused to do 15 a biased piece a features editor on [X] wanted me to do 16 I was told I'd never get another commission again and 17 I never did, not for that editor anyway." 18 Then goes on to explain why being freelance is 19 a constant challenge. 20 Finally journalist 12, a very junior journalist, 21 four years, working on two national titles doing casual 22 shifts. Can you just help us with this. Is this 23 someone who is relatively new to the industry? 24 A. Yes. They've been working as a journalist just for the 25 last four years, had been working in a different career Page 25</p>	<p>1 And then at 7.33: 2 "I've not hacked phones although there's someone in 3 every newsroom who can turn around ex-directory numbers 4 or come up with addresses and medical record checks. 5 I've asked colleagues for this myself on the advice of 6 the news editor. But I've seen the pressure people come 7 under to break stories and to curry favour with the 8 editor. There's no resources, no time to do things 9 properly. You're just supposed to pull a rabbit out of 10 a hat. It's hardly a big surprise that shortcuts are 11 taken." 12 Is there anything else that you wanted to draw our 13 attention to there? 14 A. No, except just quickly to add that the increasing 15 casualisation in the industry has really contributed, 16 I think, to the problems that there are now in 17 workplaces because employment is incredibly precarious 18 for many journalists, but they're not freelancers in the 19 traditional sense, they're not working for a variety of 20 outlets and invoicing newspapers with their bills. 21 They're paid on a daily set rate and many casuals work 22 in newsrooms every day, every week, for months on end. 23 Some of them even for years. To all intents and 24 purposes, they are a member of staff except they don't 25 have the same salaries, they don't enjoy the same sick Page 27</p>
<p>1 and had retrained to come into journalism. 2 Q. And still working in the industry? 3 A. Yes. 4 Q. This journalist says: 5 "What people don't realise is that the culture in 6 most newsrooms can be really intimidating, especially if 7 you're a young journalist trying to make an impression, 8 desperate to get a contract. I've been shifting for 9 years now. I get paid holiday, just statutory. I do 10 the same job as other reporters here but I'm paid 11 peanuts. I drive myself into work even when I'm really 12 sick, partly because I don't get paid for being off sick 13 but mainly because I don't want anyone to think I'm 14 skiving and that I'm not committed because that will go 15 against me if a contract comes up." 16 The journalist goes on to describe at 7.32 the 17 bullying and explains that he feels unable to speak out. 18 Can't afford to lose his job. 19 Halfway through 7.32 says: 20 "The other problem is the huge number of new 21 journalists working for free on internships. It's 22 incredibly competitive to get a foot in the door, so 23 once you're there, you're desperate not to blow it. 24 I think that makes it even easier for editors to treat 25 you like dirt." Page 26</p>	<p>1 leave or any of the other entitlements. They could be 2 working alongside people who have enhanced holiday or 3 enhanced sick cover, but they don't have those same 4 perks, and they can just be told, "Don't come in 5 tomorrow". 6 Some newspapers even, when they get to the 12-month 7 period of service, at the point at which they would 8 accrue rights as workers, newspapers force a two or 9 three-week break on them, an unpaid period of leave 10 before they are allowed to come back and resume their 11 duties as to all intents and purposes a member of staff, 12 but it makes it even harder for those journalists, and 13 this is why it's important to speak out or to challenge 14 anything that an editor says because they don't even 15 have the security of a staff contract. 16 Q. Can I turn to your third statement. This covers two 17 issues: Mr Derek Webb, we'll come on to that, and the 18 News International union, NISA. NISA? 19 A. NISA. 20 Q. Let me ask first about Derek Webb. You'll remember that 21 Mr Webb gave evidence to the Inquiry and you tell us in 22 fact it was on Day 18. You will recall that he was the 23 gentleman who was a former police officer who became 24 a private detective and then was asked to become 25 a member of the NUJ if he wanted to continue working at Page 28</p>

7 (Pages 25 to 28)

<p>1 News of the World. 2 Look at paragraph 3 of your statement because 3 I think there's a correction to make there. You explain 4 halfway down: 5 "The evidence is that Neville Thurlbeck, the news 6 editor of the Sun, told Mr Webb that two conditions for 7 his subsequent employment by the Sun were that he 8 terminated his private ..." et cetera et cetera." 9 Can we correct that. Mr Thurlbeck -- is there 10 a correction you'd like to make? 11 A. To change it from the News of the World to the Sun, yes. 12 LORD JUSTICE LEVESON: The other way around, actually. 13 A. Oh, it's been corrected, sorry, in my version. Yes, the 14 other way around. 15 MS PATRY HOSKINS: Mr Thurlbeck wasn't the news editor at 16 News of the World. Our understanding is that he was 17 chief reporter, so we make those corrections. 18 A. Yes. 19 Q. I want to make absolutely clear that that wasn't 20 intentional. 21 You explain that Mr Webb was absolutely right about 22 that, he did become a member of the National Union of 23 Journalists and you enclose with your statement his 24 application form at MS2. 25 I'm going to ask you questions about how one becomes Page 29</p>	<p>1 A. Just merely to say that a staff association that has 2 been established by an employer as a way of blocking 3 recognition to any independent trade union, an 4 organisation that's financed exclusively by 5 a proprietor, cannot ever provide a genuine independent 6 voice in the workplace, and I think one of the 7 journalists in the testimony earlier also makes it clear 8 that people who work within NISA and who work to 9 negotiate pay rises and things like that, they're nice 10 people, that they've been supportive; however, within 11 the very real parameters of what they can do, they're 12 not someone that people could turn to and expect to 13 represent robustly their ethical issues or issues of 14 bullying in the workplace. There is no perception that 15 they offer that independent voice and genuine 16 representative body. 17 Q. Let me ask you about Mr Webb then. You've enclosed his 18 application form. I think there was some surprise 19 expressed at the time as to how he could have become 20 a member of the National Union of Journalists, given 21 that he was not, I think it's now accepted, 22 a journalist. Look at the form very briefly and see how 23 he describes himself in that. He describes himself as 24 a researcher. Under "About your job" he says he works 25 for News International freelance and is a researcher, Page 31</p>
<p>1 an NUJ member but before I do that, can we look at 2 paragraph 4. You explain that the requirement to join 3 the NUJ is remarkable for two reasons. The first is 4 that the Sun -- I think you mean the News of the World 5 there -- together with every other News International 6 title in the UK refuses to recognise the NUJ or indeed 7 have anything to do with the NUJ, it's set up and funds 8 NISA which shall we say ostensibly represents its staff 9 but is in fact subservient to News International. 10 And you say this: 11 "This is not merely my view, it reflects a decision 12 of the certification officer of 18 May 2001." 13 And you set out the decision of the certification 14 officer, which we're not going to go through, but can 15 you confirm that was a decision in 2001 that NISA was 16 not an independent trade union since it was liable to 17 interference by News International. Can you assist us 18 with whether or not that decision was ever appealed or 19 whether any further application has been made for 20 a certificate of independence? 21 A. Not to my knowledge, but News International could answer 22 that. 23 Q. We've obviously heard the evidence of those who had the 24 experience of NISA. Is there anything else that you'd 25 like to say about NISA or that particular subject? Page 30</p>	<p>1 describes himself as a freelance researcher. 2 Over the page, he then has a proposer and 3 a seconder. Is that all he was required to do? Can you 4 explain this to us: fill in a form, have a proposer and 5 a seconder, and then he would acquire membership of the 6 NUJ? 7 A. We have a system. Applications come into the union 8 centrally. We have a longstanding system of potential 9 members needing to have a proposer and a seconder, and 10 that's because obviously the NUJ cannot hire a private 11 detective to investigate every potential member and find 12 out whether they're not telling the truth on an 13 application form, there's an element of good faith, but 14 the fact of the proposer and seconder is that they are 15 members in excellent standing within the union. 16 What tends to happen in the cases of workplace 17 applications is that the people who propose and second 18 tend to be NUJ members who are more active, who are 19 members of the NUJ chapel committee, for example, and 20 that's how most workplace applications tend into come 21 into the union centrally. 22 There's a level of processing that's done at our 23 head office in London for UK applications and then they 24 go out, the application forms are sent to branches, 25 local branches, so that in this case it would have gone Page 32</p>

<p>1 to our freelance branch in London, and again the</p> <p>2 applications are all discussed individually at that</p> <p>3 meeting of members.</p> <p>4 We suggest to prospective members that they go along</p> <p>5 to that meeting so that they're physically there to</p> <p>6 answer any questions that might happen. They're not</p> <p>7 obliged to and it didn't happen in this case, in this</p> <p>8 application, but that's another element of the checking</p> <p>9 process that takes place, but the proposer and the</p> <p>10 seconder were members in excellent standing.</p> <p>11 Q. So you don't rely necessarily on being able to check</p> <p>12 that the person actually does the job they say they're</p> <p>13 doing. You rely on the fact that a proposer and</p> <p>14 a seconder of excellent standing within the NUJ have</p> <p>15 vouched for this person and that's the basis on which</p> <p>16 this application was granted?</p> <p>17 A. Yes. Ordinarily, if it was a freelance -- most</p> <p>18 freelance applications, prospective journalists are</p> <p>19 asked to supply evidence of their work. Now in the case</p> <p>20 of researchers it's obviously not necessary, you don't</p> <p>21 have the bylined material in the same way as if you were</p> <p>22 a writer or a different type of journalist. We have</p> <p>23 many researchers within membership in the NUJ, for</p> <p>24 example at the BBC. It's perfectly valid criteria of</p> <p>25 membership within the union.</p> <p style="text-align: center;">Page 33</p>	<p>1 staff. I find the whole thing staggering. Staggering.</p> <p>2 The conceit of it from an organisation that does not let</p> <p>3 the independent union for journalists across its</p> <p>4 threshold.</p> <p>5 MS PATRY HOSKINS: I'm going to ask you about Mr Dacre's</p> <p>6 proposals for press cards in a moment, but before I do</p> <p>7 that, let's complete the circle. In what circumstances</p> <p>8 would an NUJ press card be withdrawn or somehow taken</p> <p>9 away in some form?</p> <p>10 A. I should say at the outset that not all members of the</p> <p>11 NUJ hold a press card. All members of the union have</p> <p>12 their union membership card, but it's only -- members</p> <p>13 have to demonstrate that they're bona fide news</p> <p>14 gatherers and working in that way in order to then gain</p> <p>15 the press card. There's a separate application that</p> <p>16 they make for that. It's not an automatic entitlement</p> <p>17 or something that we automatically dispense. There is</p> <p>18 another process --</p> <p>19 Q. Right.</p> <p>20 A. -- to that. And if a member leaves the NUJ, they're</p> <p>21 obliged to return their press card, if they're a member</p> <p>22 who has one. If they -- when it comes up for renewal,</p> <p>23 if they've moved to a different sector of work, for</p> <p>24 example if they've moved into PR or if they've become an</p> <p>25 academic lecturer in journalism and they are not</p> <p style="text-align: center;">Page 35</p>
<p>1 LORD JUSTICE LEVESON: Have you researched the position with</p> <p>2 the proposer and seconder?</p> <p>3 A. I have carried out checks in that regard, yes, and they</p> <p>4 believed the person to be doing journalistic work.</p> <p>5 LORD JUSTICE LEVESON: But they clearly didn't know him very</p> <p>6 well.</p> <p>7 A. The proposer had got to know this person to a degree.</p> <p>8 I think, I believe the work had turned into work of</p> <p>9 a journalistic nature, not as a private detective.</p> <p>10 LORD JUSTICE LEVESON: Do you think what Mr Webb was doing</p> <p>11 was journalistic?</p> <p>12 A. I think some of the work that, you know, in terms of --</p> <p>13 some of the work is work that journalists would do in</p> <p>14 the course of their duties.</p> <p>15 LORD JUSTICE LEVESON: That's not quite the same question,</p> <p>16 is it?</p> <p>17 A. No, I don't believe he was eligible for membership of</p> <p>18 the NUJ, no. I also find it staggering that an</p> <p>19 organisation would instruct, as Mr Webb alleges, would</p> <p>20 instruct somebody who's been a private detective for</p> <p>21 them for a long period of time to suddenly transform</p> <p>22 themselves into a journalist and that the way to do that</p> <p>23 in the eyes of that executive was to gain a membership</p> <p>24 of the NUJ and to secure one of our press cards, not one</p> <p>25 of the cards that News International dispenses to its</p> <p style="text-align: center;">Page 34</p>	<p>1 actively involved in news gathering any more than</p> <p>2 they're no longer entitled to a press card as</p> <p>3 a consequence. Of course if a member was expelled from</p> <p>4 the NUJ, we would also ask that they return their card</p> <p>5 and ensure that that takes place.</p> <p>6 Q. In relation to Mr Webb, was any investigation started</p> <p>7 with a view to removing his card or --</p> <p>8 A. That process had started and Mr Webb resigned from the</p> <p>9 NUJ.</p> <p>10 LORD JUSTICE LEVESON: He had a press card, did he?</p> <p>11 A. Yes.</p> <p>12 LORD JUSTICE LEVESON: So he's not only a member but a --</p> <p>13 A. Yes. And he's been asked to return that card.</p> <p>14 MS PATRY HOSKINS: Mr Dacre came to give evidence recently</p> <p>15 and proposed a system of press cards. He explained that</p> <p>16 there were a number of bodies producing press cards and</p> <p>17 went on to suggest that owners should register their</p> <p>18 reporters for a centralised industry-run kind of</p> <p>19 accreditation scheme, if I can put it that way, for</p> <p>20 kitemark journalists and publishers. He explained that</p> <p>21 there would be various advantages to this system. Did</p> <p>22 you hear him give evidence or read a transcript of his</p> <p>23 evidence.</p> <p>24 A. Yes I read the transcript, yes.</p> <p>25 Q. Do you have any views on the proposal that he put</p> <p style="text-align: center;">Page 36</p>

<p>1 forward?</p> <p>2 A. I think it's a ridiculous idea. I don't think it would</p> <p>3 work in practice. I don't understand the premise behind</p> <p>4 it. Why would the industry, why would the newspaper</p> <p>5 owners be in a position to somehow guarantee things that</p> <p>6 don't happen at the moment as a result of the press card</p> <p>7 gatekeepers?</p> <p>8 I think this is yet another example of how as an</p> <p>9 editor, a very high profile influential member of the</p> <p>10 industry is trying to again pin the blame on individual</p> <p>11 journalists. They want a system in place that's run by</p> <p>12 the industry, controlled by the industry and where</p> <p>13 individual journalists, if something happened, if there</p> <p>14 was an issue with reporting or example of bad practice,</p> <p>15 then that journalist's livelihood and card is somehow</p> <p>16 revoked.</p> <p>17 Where does the blame lie? Again it lies with the</p> <p>18 ordinary reporter from that perspective. It does</p> <p>19 absolutely nothing to move us forward from where we are</p> <p>20 today. And it doesn't tackle at all any of the issues</p> <p>21 about the culture, the practices and ethics within the</p> <p>22 press.</p> <p>23 So it's not at all a notion that we would support,</p> <p>24 and I have seen since the widespread reaction to it from</p> <p>25 many seasoned journalists and from many academics in the</p> <p style="text-align: center;">Page 37</p>	<p>1 considered and thought about. The determination that</p> <p>2 I have to find an answer that works for everybody, that</p> <p>3 is the industry, the journalists and the public, remains</p> <p>4 absolute.</p> <p>5 MS PATRY HOSKINS: Thank you, Ms Stanistreet. Those are all</p> <p>6 my questions. Do you have anything that you would like</p> <p>7 to add?</p> <p>8 A. I'd just like to say I'm very grateful for the fact that</p> <p>9 the evidence of these journalists was allowed to come</p> <p>10 before the Inquiry. There was a lot of tussling about</p> <p>11 it and I'm very pleased with the decision you've taken</p> <p>12 because I think it's really important that in their own</p> <p>13 words that the Inquiry gets a flavour and the wider</p> <p>14 public gets an insight into what many journalists are</p> <p>15 having to face on a day-to-day basis, and it's</p> <p>16 incredibly regrettable that you don't have a succession</p> <p>17 of journalists who feel able to come here in person and</p> <p>18 to be able to tell you in their own words and have their</p> <p>19 evidence tested, but it's for the very really reasons</p> <p>20 that I've outlined, it's a real culture of fear.</p> <p>21 LORD JUSTICE LEVESON: I understand that, Ms Stanistreet.</p> <p>22 You, of course, will equally understand the impact that</p> <p>23 the absence of that testing inevitably has upon the</p> <p>24 weight that I can put on what any of them actually say.</p> <p>25 A. (Nods head).</p> <p style="text-align: center;">Page 39</p>
<p>1 industry is that it's a ridiculous notion, it would</p> <p>2 never work, and again it doesn't account for the fact</p> <p>3 that journalists operate in a culture that is imposed</p> <p>4 upon them from above, from the likes of Mr Dacre and</p> <p>5 others within the industry, and yet under his model he</p> <p>6 would have all the power and none of the responsibility</p> <p>7 for that.</p> <p>8 It's also pretty much akin to the licensing of</p> <p>9 journalists, which of course the NUJ would absolutely</p> <p>10 oppose, and would damage press freedom within the UK,</p> <p>11 which I know is something that hopefully, you know,</p> <p>12 within the broader Inquiry is something that we all</p> <p>13 don't want to go down that path, so it's not a practical</p> <p>14 model and it's not a solution to the problems we're all</p> <p>15 sharing here in this Inquiry.</p> <p>16 Q. I understand that the NUJ does have some worked out</p> <p>17 proposals on the future of press regulation, but having</p> <p>18 spoken to you beforehand, I think you've made it clear</p> <p>19 that you would rather submit those proposals in writing</p> <p>20 to the Chairman rather than spend time now discussing</p> <p>21 them in any detail, so I'm sure that we'd be very</p> <p>22 grateful to receive the NUJ's proposals in due course.</p> <p>23 Is that acceptable, sir?</p> <p>24 LORD JUSTICE LEVESON: That's absolutely right. As I've</p> <p>25 made clear to everybody, any proposals will be</p> <p style="text-align: center;">Page 38</p>	<p>1 LORD JUSTICE LEVESON: But I'm very grateful to you and I'm</p> <p>2 grateful to you for the work that you've done to take up</p> <p>3 the difficulty that the Inquiry was clearly learning</p> <p>4 about surrounding the fact that there were journalists</p> <p>5 who were anxious to contribute but weren't prepared to</p> <p>6 come forward and be named, so I'm very grateful to you.</p> <p>7 Thank you very much.</p> <p>8 A. Thank you.</p> <p>9 MR BARR: Sir, good afternoon. The next witness is</p> <p>10 Mr Max Clifford.</p> <p>11 LORD JUSTICE LEVESON: Thank you.</p> <p>12 MR MAXWELL FRANK CLIFFORD (sworn)</p> <p>13 Questions by MR BARR</p> <p>14 MR BARR: Mr Clifford, could you give the Inquiry your full</p> <p>15 name.</p> <p>16 A. Maxwell Frank Clifford.</p> <p>17 Q. Are the contents of your witness statement true and</p> <p>18 correct to the best of your knowledge and belief?</p> <p>19 A. Yes.</p> <p>20 Q. Can I start, please, by having a little look at your</p> <p>21 career. You are a public relations consultant, very</p> <p>22 well-known, both within the industry and indeed</p> <p>23 internationally. You started off with a brief career in</p> <p>24 local journalism, then you joined EMI Records in the</p> <p>25 early 1960s as a press officer and promoted EMI artists</p> <p style="text-align: center;">Page 40</p>

<p>1 and their records.</p> <p>2 In 1971, you formed your own public relations</p> <p>3 company, Max Clifford Associates, initially representing</p> <p>4 pop stars and entertainers, but more recently your</p> <p>5 business has grown to include many different types of</p> <p>6 client, including not only stars but also companies,</p> <p>7 organisations and events.</p> <p>8 A. Yes.</p> <p>9 Q. In addition to your commercial work, you do a great deal</p> <p>10 of charity work in public relations. You tell us that</p> <p>11 you spent most of your time working, broadly speaking,</p> <p>12 in public relations, but also a significant minority of</p> <p>13 your time breaking stories and giving interviews to</p> <p>14 newspapers, magazines, radio and television. Perhaps</p> <p>15 the most well-known side of your business is the story</p> <p>16 side of your business, but you tell us that in fact that</p> <p>17 only forms about 15 per cent of your business' overall</p> <p>18 work; is that right?</p> <p>19 A. Yes. In terms of my time and in terms of the money it</p> <p>20 brings into the company.</p> <p>21 Q. You are yourself a victim of phone hacking. You tell us</p> <p>22 in your witness statement that you were contacted in</p> <p>23 2006, first of all by your mobile phone company and then</p> <p>24 afterwards by the Metropolitan Police, who notified you</p> <p>25 that your voicemail had been accessed. You subsequently</p> <p style="text-align: center;">Page 41</p>	<p>1 commercial settlement, I would recontinue my</p> <p>2 relationship with the News of the World, who I'd had</p> <p>3 a close relationship with for 30 years before</p> <p>4 Andy Coulson, under a succession of editors, and I was</p> <p>5 happy to do that. Although I wasn't dealing with the</p> <p>6 News of the World for those years, I was still dealing</p> <p>7 with the Sun, the Times and the Sunday Times on a weekly</p> <p>8 basis.</p> <p>9 Q. Is it right that News International also paid all of</p> <p>10 your legal costs?</p> <p>11 A. Yes, which was I think somewhere over £300,000. The</p> <p>12 whole package came to just under a million pounds.</p> <p>13 Q. Was there any confidentiality agreement?</p> <p>14 A. Yes. We shook hands. There was no contract. We shook</p> <p>15 hands on the understanding I wouldn't reveal the details</p> <p>16 of my settlement, which I didn't until News of the World</p> <p>17 lawyers revealed the details of my settlement, even</p> <p>18 though they got it slightly wrong.</p> <p>19 Q. Can I ask you now to cast your mind back. Was there a</p> <p>20 point in time when it became common rumour within the</p> <p>21 media industry that mobile telephones were being hacked?</p> <p>22 A. Yes. I mean it was something that I was aware of, and</p> <p>23 various journalists and people in and around the</p> <p>24 industry had spoken to me about and had spoken to each</p> <p>25 other about when I was there. Probably from early 2000.</p> <p style="text-align: center;">Page 43</p>
<p>1 learnt that you were hacked by Glenn Mulcaire, acting</p> <p>2 for the News of the World. Is that right?</p> <p>3 A. Yes.</p> <p>4 Q. You came to a settlement with News International, didn't</p> <p>5 you?</p> <p>6 A. Mm-hm.</p> <p>7 Q. And it was unusual in that you negotiated it yourself</p> <p>8 directly with Rebekah Brooks; is that correct?</p> <p>9 A. Yes.</p> <p>10 Q. Could you tell the Inquiry briefly what the terms of the</p> <p>11 settlement were that you negotiated with Rebekah Brooks?</p> <p>12 A. It was over a quiet lunch not long after Rebekah had</p> <p>13 been made chief executive, I'd known her for many, many</p> <p>14 years, Mews in Mayfair, just around the corner from my</p> <p>15 office and it was £220,000 a year for three years plus</p> <p>16 all my legal costs.</p> <p>17 Q. In return for the £220,000 per year, did you agree to</p> <p>18 provide stories for the News of the World?</p> <p>19 A. It was continuing. I had a working relationship with</p> <p>20 the News of the World, as I did with all newspapers for</p> <p>21 many years, so -- but when I fell out with Andy Coulson,</p> <p>22 I stopped working with them, I wouldn't deal with them.</p> <p>23 That went on for a few years, which is when my phone was</p> <p>24 being hacked.</p> <p>25 I agreed with Rebekah that, as part of our</p> <p style="text-align: center;">Page 42</p>	<p>1 Although I will say that many, many years before, you</p> <p>2 know, I was warning clients about -- when they were in</p> <p>3 this country about being very careful about what you say</p> <p>4 on the telephone, because things that were taking part</p> <p>5 in conversations were certainly appearing in the</p> <p>6 newspapers. I remember having those conversations with</p> <p>7 people as different as Muhammad Ali and Marlon Brando,</p> <p>8 and that was long before this.</p> <p>9 LORD JUSTICE LEVESON: That's telephones, not mobiles?</p> <p>10 A. I'm not too clever about when mobile phones really got</p> <p>11 going because I was a late starter, but it was just</p> <p>12 phones, yeah. Phone messages or phones being overheard,</p> <p>13 listened to, you know.</p> <p>14 MR BARR: You're talking about things like people listening</p> <p>15 in on an extension, that sort of thing?</p> <p>16 A. Yes.</p> <p>17 Q. Was there similarly rumour within the media industry</p> <p>18 that confidential information was being obtained by</p> <p>19 blagging from various people?</p> <p>20 A. Bagging?</p> <p>21 Q. Yes, pretending to be somebody they weren't and getting</p> <p>22 information that way?</p> <p>23 A. I think as time went by, the years went by, and the</p> <p>24 competition got fiercer and circulation started to</p> <p>25 subside, so methods became more and more creative. Any</p> <p style="text-align: center;">Page 44</p>

11 (Pages 41 to 44)

1 means. What happened, what mattered was getting
 2 a result. So in my view that's what was going on, and
 3 particularly with a -- you know, I suppose a significant
 4 minority of Fleet Street's finest. I mean, I would
 5 stress that in my experience, the vast majority of
 6 journalists I've worked with and the vast majority of
 7 journalists I've been closely involved with for 45 years
 8 or more, press, television, radio, wouldn't get involved
 9 in anything like this, and the tiny minority that did,
 10 some of them were forced. Some of them had no choice.
 11 If you don't, you're out, you're sacked, you're
 12 finished. That's my belief. But it was a tiny
 13 minority. It was a cancer which hopefully now is being
 14 cut out.

15 Q. Is the source of your information simply the many
 16 conversations that you have with people within the
 17 industry or do you have anything more specific?

18 A. No, no, it's not specific. I mean, it isn't something
 19 that I was making a detailed study of or survey of. It
 20 was just something I became increasingly aware of as the
 21 years went by, particularly over the last ten years.
 22 And with regard to stars and phones, you know, bugs
 23 would be put in rooms where they were staying in hotels
 24 and things like that, and that's long before the phone
 25 hacking, mobile phones.

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1 Q. Do you have any feel for what's going on at the moment?
 2 Has the scandal which broke last summer had a chilling
 3 effect on the types of methods which are being used now
 4 to obtain stories?

5 A. I mean hopefully yes, I mean, it's frightened people and
 6 made them stop those kind of things, which is what
 7 I believe and sincerely hope, but also the effect of
 8 this Inquiry, I think, has frightened editors, so, you
 9 know, for example, in recent months there's several
 10 major stories which would have dominated the headlines
 11 that I'm aware of which haven't come out.

12 Q. I don't want you on that topic to say anything which
 13 would invade any individual's privacy, but can you give
 14 us some idea of what exactly it is which is holding
 15 editors back from publishing the sort of story you have
 16 just mentioned?

17 A. Well, I think it's a backlash. It's a public backlash.
 18 I mean, what really got the British public angry was
 19 Milly Dowler and the McCanns, wasn't it? People like
 20 that. You know, stars having their phones tapped,
 21 people like myself that are successful, wealthy, have
 22 done very, very well out of the media or films,
 23 television, so what, those people don't care, they have
 24 far more important things to worry about. But when they
 25 read and heard about Milly Dowler, when they read and

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1 heard about the McCanns, I think they were shocked and
 2 horrified. That had an effect. And that sent shock
 3 waves throughout Fleet Street, particularly the
 4 tabloids.

5 So editors, I think, in more recent times, I know,
 6 because of conversations, because of things have come
 7 up, because of things I'm aware of, wouldn't run with
 8 something because of the Leveson Inquiry. So it's gone
 9 from one extreme to the other.

10 LORD JUSTICE LEVESON: You'd better tell me, Mr Clifford,
 11 excluding the possible impact on your business, is that
 12 a good thing or a bad thing?

13 A. I think it's a good thing, because they're being far
 14 more responsible and it has no impact on my business
 15 because --

16 LORD JUSTICE LEVESON: All right, I was just trying to make
 17 sure.

18 A. Sure, okay.

19 MR BARR: You were asked whether you were aware of any other
 20 forms of hacking and what you tell us in your witness
 21 statement is that you worked with Rebecca Leighton, who
 22 was the nurse who, it turns out, was wrongly accused of
 23 poisoning her patients by tampering with saline drips,
 24 and you tell us in your witness statement that you have
 25 real concerns about photographs which were taken from

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1 her Facebook account and then used in national media
 2 stories.

3 I don't want to ask you about the technical details,
 4 because I understand that you're not a Facebook user --

5 A. No.

6 Q. -- yourself, but it was a concern that those photographs
 7 had been obtained when they shouldn't have been?

8 A. I mean, this was basically she came to me for help
 9 because she was being destroyed by the media, she said
 10 unfairly, the same as Robert Murat did years before over
 11 the disappearance of Madeleine McCann. I introduced her
 12 to Charlotte Harris and it was Charlotte that basically
 13 came up with this and brought this to my attention.

14 Q. Thank you. You have previously described the British
 15 media as being the most savage media in the world.

16 A. Mm-hm.

17 Q. Apart, perhaps, from the slight chilling effect that
 18 you've described a moment ago, do you still think that
 19 that is true?

20 A. I mean I think it's a bit gentler at the moment, but
 21 potentially, yes, they destroy people. I mean, they
 22 also do a lot of wonderful things, a lot of very good
 23 things, and if we didn't have a free press, we wouldn't
 24 know about MPs fiddling their expenses and all kinds of
 25 things that we must know about and we must have a free

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<p>1 press. It's the best chance anybody's got, otherwise 2 we're like Chinese and Russians and just slaves to the 3 system. 4 But are they savage? Can they be savage? 5 Absolutely right. Of course some of the most successful 6 papers are the most savage because an awful lot of 7 people would much rather read nasty things about other 8 people than nice things. 9 Q. Perhaps that's a useful introduction to look at some 10 particular aspects of your public relations work. I'd 11 like first of all to turn to the story side of your 12 business. 13 A. Mm-hm. 14 Q. On Max Clifford Associates Limited's website there it is 15 a page which carries a heading "Got a news story", and 16 it explains essentially what it is that you do. It says 17 that you've been responsible for over 170 front-page 18 exclusives within the last 18 months. Is that broadly 19 speaking correct? 20 A. Quite probably yes. 21 Q. And that what you do is that if someone has got a story 22 that you think is worth pursuing, that you will broker 23 the story for the highest possible price? 24 A. No, not necessarily. It depends what people want. 25 Sometimes they don't want money, they want justice.</p> <p style="text-align: center;">Page 49</p>	<p>1 might be Panorama or it might be -- and set up meetings 2 and then it goes in or it doesn't go in, according to 3 what the newspaper, television or whatever discovers and 4 what proof there is. 5 Q. I see. I'll be coming back in a little while to the 6 people that you've helped protect from publicity, but 7 for the moment, dealing with those that you have helped 8 to break stories. 9 A. Sure. 10 Q. Typical examples might be Rebecca Loos or Bienvenida 11 Buck or Daisy Wright, who was Jude Law's nanny? 12 A. Yeah. 13 Q. Have you noticed that the recent developments in the law 14 of injunctions, have they had an effect on kiss-and-tell 15 stories? 16 A. Yes, they have, because injunctions or superinjunctions 17 is something that obviously protects the rich and 18 famous. Unfortunately, it's not available to ordinary 19 members of the public, but fortunately, because of 20 Ryan Giggs, I think that hopefully that's on the way 21 out. 22 Q. You're on record as having said to a reporter from the 23 Guardian, or it's published in the Guardian, at least, 24 that only 20 per cent of the stories that you've placed 25 in your career would qualify for publication on the</p> <p style="text-align: center;">Page 51</p>
<p>1 Sometimes they want to clear their name. Sometimes -- 2 so it just depends on what it is. Every situation is 3 different and every time anybody comes to me, it's 4 a different -- sometimes a different scenario. 5 Sometimes it's purely just a question of stopping things 6 which are damaging them. 7 For example, when the News of the World came out 8 with their story about Max Mosley, which I had nothing 9 to do with, within a period of time the woman who had 10 organised Mr Mosley's entertainment contacted me. Can 11 she come and see me? So she did, and she explained that 12 she was there and I think she'd arranged the other 13 ladies that were there entertaining Mr Mosley, but there 14 was no Nazi theme to this at all. What she said was 15 "The News of the World now are trying to get me to say 16 there was, and if I don't, they're going to put my name 17 and pictures all over the papers." 18 I contacted people at the News of the World and 19 stopped it. That kind of things happens all the time. 20 There's no money involved, but you're in the middle of 21 all kind of things like that all the time. 22 When people come to me, I check out the story, or 23 people that work for me check out the story, and if we 24 believe it to be true and if we want to get involved, 25 then it's a question of contacting the newspaper or it</p> <p style="text-align: center;">Page 50</p>	<p>1 grounds of public interest, and I'm reading a quotation, 2 "a real public interest". 3 A. Yeah, I would say that 20, maybe 25 per cent. I mean, 4 you know, we're going back 40 years. And there's 5 probably 50 per cent that are -- could be debated, with 6 a very strong argument for both sides, and then there's 7 another 25 per cent that there's no way, or 20, 8 25 per cent. I couldn't ever justify Freddie Starr and 9 the hamster as being in the public interest. I wouldn't 10 try to. 11 Q. Has there been a trend? Are there now about the same or 12 more or less stories that you could put your hand on 13 your heart and say are genuinely in the public interest? 14 A. It hasn't changed at all. 15 Q. On that question of factual detail, there are stories 16 which you've been involved in which have become famous 17 because of details which turned out not to be true. One 18 of the most famous was the "Freddie Starr ate my 19 hamster" headline. What role did you play in that false 20 headline? 21 A. As I say, 80 per cent of my business is and has been 22 public relations. I'm paid retainers by clients. 23 Freddie Starr was a client for years. 24 Someone went to the Sun when Kelvin MacKenzie was 25 editor, 1986, claiming that Freddie had eaten her</p> <p style="text-align: center;">Page 52</p>

13 (Pages 49 to 52)

<p>1 hamster. She had a boyfriend Freddie was on good terms 2 with. They'd fallen out and as an act of spite and 3 vengeance. 4 So Kelvin MacKenzie, editor of the Sun, called me 5 and said, "We've got this great story on Freddie Starr". 6 "What is it?" "It's he ate a hamster", et cetera, 7 et cetera. I said "Can you give me an hour and I'll get 8 back to you". 9 I phoned Freddie and he denied it. I phoned his 10 manager, Leon Fisk, and he said as far as he was aware 11 he'd never seen Freddie eat a hamster and he was with 12 him most of the time in those days and they both said 13 could I stop it? 14 My decision was to say to Kelvin, "Freddie denies 15 eating a hamster, but I'm more than happy for the story 16 to go in because he's about to do a British tour and 17 I think it would be great publicity for him". 18 Fortunately for me it worked out that way. 19 Q. Did you see any ethical difficulty in effectively giving 20 Mr MacKenzie the green light to publish -- 21 A. Not at all. 22 Q. -- a false story? 23 A. No. I told Mr MacKenzie that Freddie had denied it. He 24 said to me, "Have you ever seen him do anything like 25 that?" and I said, "No, I've seen him put some very Page 53</p>	<p>1 to in the bedroom. It does nothing to entertain or even 2 interest me. Again, to be honest with you, I'd much 3 rather enjoy a sex life than read about other people's. 4 Q. I'm thinking because that was perhaps a detail, unlike 5 the Freddie Starr story, that did actually have 6 consequences because it was one thing for Mr Mellor to 7 face the consequences of what he did actually do; it was 8 quite another for him to suffer the humiliation of being 9 ridiculed for something that he didn't do. 10 A. Well, if he didn't, the only two people that know that 11 are David Mellor and Antonia de Sancha. 12 Q. You've described to the Select Committee back in 2003, 13 and two others, how you've witnessed celebrity culture 14 in this country change over the decades. 15 A. Mm-hm. 16 Q. Do you think that the British obsession with celebrity 17 has reached an unhealthy level? 18 A. I think it's unhealthy that celebrities have so much 19 influence over young people, and stars, for lots of 20 different reasons. 21 I think there was a survey just a few years ago of 22 8-year-olds asked what they wanted to do, a national 23 survey, when they left school, and a huge amount said, 24 "Be famous". Well, that's sad, and of course because so 25 many celebrities are famous when they've obviously got Page 55</p>
<p>1 strange things in his mouth over the years, but never 2 a hamster", because that is the truth, I haven't. But 3 I was happy to encourage it because I was looking after 4 Freddie's career and his PR and I believed it would be 5 something which would help him. 6 Q. So effectively you passed the decision to Mr MacKenzie? 7 A. Yes. 8 Q. To make -- 9 A. In spite of my client wanting me to stop it. 10 Q. The other perhaps infamous example was the detail that 11 was given of David Mellor's affair with Antonia de 12 Sancha. Is it right that the detail about the Chelsea 13 football shirt was completely made up? 14 A. Well, I mean the only person that knows what 15 David Mellor wore was Antonia de Sancha and 16 David Mellor. I didn't give the interview. I wasn't in 17 the room with the journalist when Antonia de Sancha gave 18 the interview. She had to swear, I would assume, an 19 affidavit that that's exactly what happened. 20 So, you know, everyone has always said, "Well, you 21 made it up". I didn't make it up. And even if I had 22 have made it up, she was doing the interview and I had 23 nothing to do with that interview. I don't tend to sit 24 in, because to be honest with you, I don't particularly 25 want to hear about what David Mellor might have been up Page 54</p>	<p>1 absolutely no talent at all, then I think it obviously 2 can be worrying. 3 I think I've always tried, whenever I speak on 4 television or in the media or at universities or -- to 5 explain my thoughts about stars and celebrities as being 6 generally much ado about nothing, a world full of very 7 selfish people who generally are only interested in one 8 person, and often, including major stars, people who are 9 very unhappy because no matter how big they become, 10 they're jealous of somebody else or petrified of someone 11 else coming up behind them. 12 So I would agree with what you're saying, but it's 13 not something I've ever tried to promote or believe. 14 Q. I wasn't suggesting that you were, I was just trying to 15 establish what your view was. And also from your inside 16 view and enormous experience of the industry, is it 17 right that the media industry has deliberately built up 18 and then knocked down celebrities? 19 A. Well, it's commercial. It sells. You know, there's 20 a huge market grown up in the last 10, 20 years. You 21 only have to look at the girlie magazines and the fact 22 that most tabloid newspapers now have a huge amount of 23 stories about so-called celebrities, and, you know, 24 columns in all the big national tabloids about 25 celebrities, which obviously journalists have to fill Page 56</p>

<p>1 every day. To me, it's always been much to do about 2 very little, but it's become a very big industry. 3 As to whether it's right or wrong, I mean, you know, 4 that's basically controlled by the British public. If 5 they don't want to read it, they don't buy it, in which 6 case the magazines and papers won't write it. But 7 because it's seen to be successful and market research 8 must have shown that, it will continue. 9 Q. Can I move now back to the subject of the ordinary 10 people caught up in stories who you've helped. You 11 mentioned a moment ago Robert Murat. This Inquiry has 12 heard quite a lot of evidence about the disappearance of 13 Madeleine McCann and the effects that this had on media 14 coverage and the suffering of the McCann family. 15 Can I ask you, in your work with Mr Murat was the 16 PCC of any use? 17 A. No. 18 Q. Why not? 19 A. Well, I mean, they were nowhere on the horizon. No, 20 Robert Murat came to me, initially his mother and then 21 his aunt, incredibly upset because of what was appearing 22 in the British press about him, and asking me if I'd be 23 prepared to help him. They explained he didn't have any 24 money, but this was a man who was bordering on suicide. 25 They were being spat at in the street. So I said,</p> <p style="text-align: center;">Page 57</p>	<p>1 happen. 2 Q. So what you're envisaging, if I'm understanding you 3 correctly, is at least some part of a future regulator 4 which is capable of reacting very quickly when an 5 ordinary member of the public comes to them with 6 a complaint about press conduct? 7 A. It's not just that, it's more than that. It's a lot 8 more than that. Anticipation. The biggest part of 9 public relations in terms of damage limitation is 10 anticipation. If you're aware of a potential problem, 11 you can do something about it. 12 When a member of the public is suddenly contacted by 13 a national newspaper with a story which potentially is 14 going to be incredibly damaging to them, their family, 15 they should be able to call someone who will help them, 16 and if necessary, that person has the power to stop that 17 story until they've had a chance to show, see the proof, 18 see the justification. 19 Afterwards is too late, the damage has been done. 20 Q. Can I take it from your answer that implicit in that is 21 you think that prior notification of damaging stories is 22 utterly essential? 23 A. Absolutely. I'm not talking about exposing major 24 security risk, terrorists, paedophiles, all these kind 25 of things. I'm talking about ordinary members of the</p> <p style="text-align: center;">Page 59</p>
<p>1 "Well, I am happy to", you know, if I sit down and 2 listen to what he has to say, and I did, and I got 3 involved. And what I tried to do was to help him stop 4 this problem. 5 Q. If I could just pause you there, for a man who is there 6 on the brink of being destroyed by the media in 7 a fast-moving story, what sort of measures are really 8 effective at preventing the damage? 9 A. I've had this discussion for many, many years. The only 10 really effective way is you have to have a strong Press 11 Complaints Commission, an independent Press Complaints 12 Commission, which isn't financed by Fleet Street, which 13 is prepared to be proactive, not just for stars and the 14 so-called celebrities. They get plenty of protection, 15 more protection than many of them deserve because they 16 can afford to employ rich lawyers and expensive PR 17 people like me to protect them. 18 Ordinary members of the public in my view have got 19 no one at all and no protection from anybody. Certainly 20 not within the law. I mean, I've known of dozens and 21 dozens of examples of people whose lives have been 22 damaged, destroyed, by excessive media activity. And 23 there is no one there for them. 24 It's vitally important that we -- if one good thing 25 comes out of this Inquiry, I hope that that's what will</p> <p style="text-align: center;">Page 58</p>	<p>1 public that suddenly something's happened in their 2 family and they're thrown into the media spotlight. 3 They need to be able to contact a professional body 4 which will take care of them so that they can say, "This 5 newspaper has contacted me and they want or they're 6 threatening or we don't want to have anything to do with 7 them, this is a private matter within our family, or 8 what they're coming out with is totally untrue, unfair" 9 and this body will have to say to the editor, "You don't 10 run that until we've had a chance to look into it, on 11 the understanding that if it stands up and if it's 12 justified, that newspaper still gets the exclusive, so 13 that the competition can't take advantage of that". 14 That's your only way it's ever going to be remotely 15 fair for the vast numbers of people that are put in this 16 situation, like the McCanns, like Robert Murat, like 17 dozens and dozens of others. 18 Q. So it follows that that sort of regulator needs to have 19 really quite significant powers -- 20 A. Of course. 21 Q. -- to dictate to the press at those times? 22 A. Absolutely, they have to have the power to stop the 23 excesses, to stop the wrong. 24 Q. In terms of funding, you said that you didn't think it 25 should be a body funded by the press. Why do you say</p> <p style="text-align: center;">Page 60</p>

<p>1 that?</p> <p>2 A. It's not going to be independent. They're paying their</p> <p>3 wages. So it has to be funded by, in my view,</p> <p>4 Parliament, because we must have a free press, but we</p> <p>5 must have a responsible press in any healthy democracy.</p> <p>6 It should be also funded by newspapers. They should</p> <p>7 contribute, but they mustn't have a controlling interest</p> <p>8 financially or in any other way.</p> <p>9 Q. No doubt that thinking translates in your mind to who</p> <p>10 should be making the decisions on such a regulatory</p> <p>11 body. Do you think there is any place at all for</p> <p>12 a serving newspaper editor on such a body or not?</p> <p>13 A. No.</p> <p>14 Q. Do you think there is a place on such a body for</p> <p>15 a retired newspaper editor?</p> <p>16 A. Depends on the individual. I mean, I wouldn't like to</p> <p>17 see Kelvin MacKenzie on the board.</p> <p>18 Q. Do I take it from that that what you think is the single</p> <p>19 most important quality for somebody in any regulator is</p> <p>20 someone who the public are going to have confidence will</p> <p>21 act fairly and impartially?</p> <p>22 A. You want a fair and strong and independent man or woman,</p> <p>23 men and women making those decisions, with no bias, with</p> <p>24 no advantages from newspapers or anybody else.</p> <p>25 Q. It might be said for those in the PCC that they have</p> <p style="text-align: center;">Page 61</p>	<p>1 Mr Simon Cowell, it's right, isn't it, that he's been</p> <p>2 a client of yours for some years now?</p> <p>3 A. Ten years, I think.</p> <p>4 Q. I don't want to press you for the precise fees that he</p> <p>5 pays you, but would it be fair to say that they are very</p> <p>6 substantial sums of money?</p> <p>7 A. I mean, most of my clients pay me in the region of</p> <p>8 £200,000 to £250,000 a year.</p> <p>9 Q. And in return for that, you use your knowledge of the</p> <p>10 industry and your extensive contacts and your skills in</p> <p>11 public relations to advise them, to get them</p> <p>12 introductions to assist with their profile?</p> <p>13 A. You do the best you can to obviously enhance their</p> <p>14 career in whatever shape or form. Initially,</p> <p>15 particularly with someone -- I mean, when Simon first</p> <p>16 came to me, he wasn't known, so initially it was about</p> <p>17 promotion. As the years went by and he became more and</p> <p>18 more successful internationally, so then it becomes more</p> <p>19 and more about protection, as with all of the big stars</p> <p>20 I've ever worked with or do work with.</p> <p>21 Q. If we go back to the start of that relationship, is it</p> <p>22 right that what you were able to do is introduce</p> <p>23 Mr Cowell to people close to the Murdochs?</p> <p>24 A. Yes. I mean, I think I was instrumental in introducing</p> <p>25 Simon to Rupert Murdoch by a contact I had at</p> <p style="text-align: center;">Page 63</p>
<p>1 introduced an anti-harassment service. How effective,</p> <p>2 in your experience, has the existing anti-harassment</p> <p>3 service been?</p> <p>4 A. Well, I mean, I'm in the industry. I'd never heard of</p> <p>5 it. So, you know, I'm sure that the vast majority of</p> <p>6 the British public won't be aware. But also, I think</p> <p>7 the vast majority of the British public, certainly those</p> <p>8 I've known of and met and been involved with, wouldn't</p> <p>9 have had a clue about the Press Complaints Commission,</p> <p>10 how to contact them and what to do. It's not something</p> <p>11 that everyone is aware of and very few people.</p> <p>12 Q. Is that another point that we should take on board for</p> <p>13 the future, namely that any future body needs to be very</p> <p>14 well publicised?</p> <p>15 A. Absolutely right. In other words, if you need an</p> <p>16 ambulance, you know who to call. If suddenly you're</p> <p>17 thrust into a potential media nightmare, you need</p> <p>18 someone you can call straight away who is able to</p> <p>19 respond and hopefully stop a potential disaster which</p> <p>20 could destroy you and your family.</p> <p>21 Q. Can I move now to the work you've done on enhancing the</p> <p>22 public relations profiles of clients. I understand that</p> <p>23 a lot of your clients are corporate clients but for the</p> <p>24 purposes of this Inquiry, I'm more interested in perhaps</p> <p>25 some of the celebrities. If we take as an example</p> <p style="text-align: center;">Page 62</p>	<p>1 News International, probably including Rebekah, because</p> <p>2 don't forget, his aspirations were very much television,</p> <p>3 and particularly when it came to the States, which was</p> <p>4 a very, very big target for Simon, Rupert Murdoch was</p> <p>5 a very powerful force.</p> <p>6 Q. And it's perhaps a testament to what you've been able to</p> <p>7 do for him initially and now to protect him from, and</p> <p>8 other clients like him, that the effect of your work is</p> <p>9 enough to command fees of the type that you have</p> <p>10 described?</p> <p>11 A. The only reason for Simon Cowell's success is Simon</p> <p>12 Cowell, but obviously in terms of the media, in terms of</p> <p>13 image, particularly in the early days, you know, you</p> <p>14 play a big part in creating that image, and also trying</p> <p>15 to do the best you can to control that image as it</p> <p>16 grows, but also making sure you don't do an interview</p> <p>17 with that journalist because you can't trust him, you</p> <p>18 can't do an interview with that, don't do this, don't go</p> <p>19 there.</p> <p>20 In the early days, although you're promoting them,</p> <p>21 you're also teaching them the minefield that the media</p> <p>22 is, not just in this country, but everywhere. "If you</p> <p>23 say that to this one, then that's not how it's going to</p> <p>24 appear so don't".</p> <p>25 Q. On that question of trust, what sort of proportion of</p> <p style="text-align: center;">Page 64</p>

16 (Pages 61 to 64)

<p>1 journalists do you consider are trustworthy and what 2 proportion untrustworthy? 3 A. It's very simple. Most of the journalists I deal with 4 are trustworthy, because you don't work with those that 5 aren't. Over the years, the vast majority of 6 journalists I've worked with in the press, radio and 7 television have been and are trustworthy. There's a few 8 that aren't. Probably in the last ten years with the 9 pressures of Fleet Street, those numbers have increased 10 slightly, but they're still the minority. And often 11 those journalists that are doing things that maybe they 12 shouldn't be doing are desperately unhappy about doing 13 them, but if they don't, then they've lost their job. 14 Q. Mr Clifford, if I could now perhaps explore with you 15 some of the approaches that you might use to protect 16 somebody from a damaging media attack, the first example 17 I would like to take is from your book, and it's in the 18 chapter about Rebecca Loos and David Beckham, and 19 obviously in that case you acted for Rebecca Loos, but 20 what the book says at the end of the chapter is if in 21 fact your client had been David Beckham, there are 22 things that you might have been able to do to limit the 23 damage to his reputation. 24 A. Mm. 25 Q. It says:</p> <p style="text-align: center;">Page 65</p>	<p>1 I do?" So I called the editor of the Sun or one of the 2 editors of the Sun and found out they didn't have enough 3 to make the story stand up. My advice to her was, "Say 4 nothing, keep away from the famous footballer, phone him 5 and warn him and it will go away. They can't prove it." 6 She did just that. The famous footballer then 7 contacted his lawyer and the rest is history. So I'm 8 protecting and stopping things all the time. Sometimes 9 I can, sometimes I can't. And, you know, if you like, 10 the famous footballer wasn't a client. 11 Q. You give another example in your book of a senior Labour 12 Party politician, some years ago now, and you say that 13 he was concerned that an infidelity was going to be 14 exposed by the other party and that you advised him that 15 he should expect a telephone call from the woman which 16 would be recorded and used as proof, and so your advice 17 to him was not to say anything incriminating when the 18 call came, and such a call did in fact come. Is that 19 again the sort of advice you give? 20 A. I did that just last week with a very famous artist. 21 Q. Sticking with the senior Labour politician, you go on in 22 your book to say that it was in fact that same person 23 who later, by way of returning the favour, told you 24 about Cherie Blair's pregnancy? 25 A. That wasn't the source of my information, but they</p> <p style="text-align: center;">Page 67</p>
<p>1 "Max could have arranged for David to either lose 2 his mobile or lend it to a mate. The friend, who would 3 have been single, would have owned up to having used the 4 phone to send sexy text messages for a laugh and been 5 paid handsomely to keep his mouth shut." 6 A. I think at the time that was quite light and flippant, 7 you know, but it does and has happened. 8 The biggest part of stopping damaging stories, 9 whether they're sex scandals -- and I've stopped 10 hundreds of them over the years, from many of the stars 11 I've represented or even just people I've known -- is 12 anticipation. You're aware that they're looking to do 13 this. You know, there's a major star that was involved 14 not so very long ago who had a real drug problem. 15 No one knew that, but I was aware that a newspaper were 16 looking into it, so I made very sure that they couldn't 17 get the evidence that they wanted in order to come out 18 with that. 19 Another example just recently was when Imogen Thomas 20 came to me and said "I believe the Sun are about to run 21 a story about my relationship with" an alleged 22 footballer, because I don't think I'm allowed to mention 23 his name, there is an injunction. 24 Q. There's no need to anyway. 25 A. All right. "Because of a famous footballer, what can</p> <p style="text-align: center;">Page 66</p>	<p>1 confirmed it. 2 Q. I see. 3 A. It wasn't -- I think Alastair Campbell claimed it came 4 from phone hacking. It wasn't. It was from someone who 5 was very close to Cherie Blair and she confided in him. 6 They told me, I checked it out and it appeared two days 7 before they were going to release it anyway. I think 8 I gave it to Piers. 9 Q. You say in your book you told Piers Morgan and 10 Piers Morgan consulted Mr Campbell. 11 A. Well, Piers would know who, yes, fine, but it didn't 12 come out as a result of phone hacking. 13 Q. Another device, is it right, for protecting a client 14 would be if there are incriminating photographs -- I use 15 the word incriminating in the widest sense -- that you 16 buy them up? 17 A. Yes. There's been many, many times over the years when 18 people have come to me with pictures which, if they 19 appeared in the national press, would be very 20 embarrassing to some of the stars I've represented, so 21 prevention is better than cure, so it's 22 a straightforward business situation. I'm not talking 23 about paedophiles or anything underage or anything like 24 that, just straightforward someone having a relationship 25 when they're in a relationship, or it's not in their</p> <p style="text-align: center;">Page 68</p>

<p>1 interest for it to come out.</p> <p>2 Q. I understand. Do you sometimes call in favours amongst</p> <p>3 your many contacts to protect your clients?</p> <p>4 A. As much as I possibly can. You know, you do what you</p> <p>5 can. You try to have as much influence as you possibly</p> <p>6 can, and any PR person that doesn't try the same I think</p> <p>7 I would be tending to be a bit suspicious of.</p> <p>8 Q. And presumably if an editor is committed or wants to</p> <p>9 publish a story, one of the things that you can do is to</p> <p>10 say that you will be able to assist your client to have</p> <p>11 a voice in responding to any story and pointing out just</p> <p>12 how sleazy the publisher is being in publishing the</p> <p>13 story. Is that another device?</p> <p>14 A. I think it's just -- I mean, you're just aware. For</p> <p>15 example, I mean the slightly different tack, when</p> <p>16 Gerald Ratner destroyed his business by talking about</p> <p>17 that a lot of his jewellery was rubbish or whatever, he</p> <p>18 tried to argue he never said it or he didn't really mean</p> <p>19 it or it was taken out of context, and of course no one</p> <p>20 would print it because it was really journalists saying</p> <p>21 that journalists were unreliable, we're unreliable.</p> <p>22 So when a few years later -- I had no involvement</p> <p>23 with that at all -- he came to me and he said "I'm about</p> <p>24 to relaunch a new business, will you help me?"</p> <p>25 I explained "Okay, fine, but what you have to do is to</p> <p style="text-align: center;">Page 69</p>	<p>1 substance.</p> <p>2 So I think to a degree it's happened over here.</p> <p>3 David Cameron was a public relations man, I believe,</p> <p>4 years ago, and it shows.</p> <p>5 Q. How has that affected politicians' approach to the</p> <p>6 media?</p> <p>7 A. I think they're far more realistic. I mean, the media</p> <p>8 have become far more intrusive over the last 20 years,</p> <p>9 it's an increasing thing. So the kind of things that</p> <p>10 Winston Churchill might have done and got away with, you</p> <p>11 wouldn't today. Or anybody, any major leader. That's</p> <p>12 just how things have gone.</p> <p>13 Q. Have you detected any fear amongst politicians of the</p> <p>14 press and what the press might do to their image and</p> <p>15 popularity?</p> <p>16 A. Well, a popularity contest is an important part of being</p> <p>17 a politician, so like any major star, you want to try</p> <p>18 and get the best from the media, and I think more and</p> <p>19 more politicians are probably guided by the PR people</p> <p>20 behind the political parties, et cetera.</p> <p>21 I mean, I remember doing Question Time many years</p> <p>22 ago and we were talking about various subjects that</p> <p>23 might come up before the show, because they don't tell</p> <p>24 you, and what astonished me was when I went on the show,</p> <p>25 the politicians representing the different parties, what</p> <p style="text-align: center;">Page 71</p>
<p>1 take the blame. Say that it was totally down to you,</p> <p>2 you did say that, you made a fool of yourself,</p> <p>3 et cetera, et cetera, et cetera, they'll be happy to</p> <p>4 write that." And they did. Within a few months, his</p> <p>5 business was back, Gerald Online was back, making more</p> <p>6 money than his jewellery business. So it's</p> <p>7 understanding the way it works, and most of it's common</p> <p>8 sense.</p> <p>9 MR BARR: Sir, is that a convenient moment?</p> <p>10 LORD JUSTICE LEVESON: Yes. We'll just take five minutes.</p> <p>11 (3.34 pm)</p> <p>12 (A short break)</p> <p>13 (3.41 pm)</p> <p>14 MR BARR: Mr Clifford, can we move now to the relationship</p> <p>15 between the press and politicians, and such insights</p> <p>16 about that relationship as you might be able to give us?</p> <p>17 First of all, what has been your experience of</p> <p>18 politicians and attitudes to image and public relations?</p> <p>19 A. Well, I suppose we tend to follow the Americans, so</p> <p>20 I think our politicians today are far more aware of</p> <p>21 image and presentation, and I think the whole of the</p> <p>22 approach to politics has been influenced by what I would</p> <p>23 call the American way, where image is everything and</p> <p>24 American presidential campaigns are like popularity</p> <p>25 contests, far more about presentation often than</p> <p style="text-align: center;">Page 70</p>	<p>1 they said in answer to a question that came up was very</p> <p>2 different from what they said before we went on, because</p> <p>3 that was the party line, so therefore they had to stick</p> <p>4 to that. Even though it wasn't necessarily what they</p> <p>5 believed or thought or -- but that's just the way it's</p> <p>6 gone.</p> <p>7 Q. Have you come across the press trying to exploit the</p> <p>8 power that they have over the image of politicians in</p> <p>9 any way?</p> <p>10 A. Well, I mean, I think it's fair to say that any</p> <p>11 newspaper proprietor would want to have as much</p> <p>12 influence as possible, and obviously, you know,</p> <p>13 politicians have a lot of power and make decisions and</p> <p>14 make policies that can have a big impact on them and</p> <p>15 their businesses, but it's not just newspaper</p> <p>16 proprietors, it's anybody out there. Whether they're in</p> <p>17 the City, in banks, in vast organisations, the closer</p> <p>18 and the more influence you can have on the people of</p> <p>19 power, obviously the better for you.</p> <p>20 Q. Of course. But the difference between the media and</p> <p>21 other industries is they have the voice, the power to</p> <p>22 publish stories to millions of people.</p> <p>23 A. Absolutely.</p> <p>24 Q. So what I was exploring is whether you have any</p> <p>25 experience of the press using that power to try and</p> <p style="text-align: center;">Page 72</p>

<p>1 influence politicians.</p> <p>2 A. No. I've not had any close involvement on the kind of</p> <p>3 things that could have gone on behind the scenes, but</p> <p>4 obviously again common sense tells you that</p> <p>5 Rupert Murdoch supporting David Cameron in the last</p> <p>6 election made a difference.</p> <p>7 Q. Have you come across -- you mentioned a moment ago</p> <p>8 politicians having to follow the party whip, which we</p> <p>9 well know.</p> <p>10 A. Mm-hm.</p> <p>11 Q. Have you come across politicians within the same party</p> <p>12 trying to damage each other's reputations and using the</p> <p>13 media to do that?</p> <p>14 A. I think that's all part of being an ambitious</p> <p>15 politician. You want to get on. You want to be the top</p> <p>16 person, so some people are more ambitious than others.</p> <p>17 Whether they're journalists or politicians.</p> <p>18 Q. I don't want you to give any names or details, but have</p> <p>19 you any personal knowledge of that sort of thing</p> <p>20 happening?</p> <p>21 A. Well, I've got an awful lot of awareness of powerful</p> <p>22 important people in newspapers wanting to have as much</p> <p>23 influence as possible on politicians, but that's</p> <p>24 probably always been the case. It's just possibly a bit</p> <p>25 easier now to see.</p> <p style="text-align: center;">Page 73</p>	<p>1 when they become unpopular or something happens.</p> <p>2 You know, my observation from a distance was that</p> <p>3 when Alastair, who was new to it, you know, the major</p> <p>4 criticism -- only criticism -- was that his ways were</p> <p>5 certainly not the ways that I would have employed or</p> <p>6 used, and my own experience was that at that particular</p> <p>7 time, Peter Mandelson was very complimentary to me</p> <p>8 because I was bringing out Tory sleaze, but after the</p> <p>9 election, I never heard from him.</p> <p>10 Q. Was Mr Campbell selective in those to whom he would feed</p> <p>11 stories?</p> <p>12 A. I know very little about Alastair Campbell in terms of</p> <p>13 how he operated, who he spoke to, how he dealt with.</p> <p>14 You know, I've given you an overall observation. It's</p> <p>15 purely on PR and talking to people in the media, but</p> <p>16 I honestly don't know.</p> <p>17 Q. I don't want to press you into areas that you can't help</p> <p>18 us with, so it's a very fair answer, Mr Clifford, and</p> <p>19 I'll move on now to the question of editorial</p> <p>20 independence. You said to the Select Committee back in</p> <p>21 2003, well, the picture you painted was that editors do</p> <p>22 have a good degree of editorial independence. I think</p> <p>23 the way you described it then was Mr Desmond was the man</p> <p>24 who tended to intervene the most, that you thought that</p> <p>25 at that time Mr Morgan and Ms Brooks would have far more</p> <p style="text-align: center;">Page 75</p>
<p>1 Q. Can I ask you now particularly about the approach of the</p> <p>2 New Labour press machine, and what's commonly been known</p> <p>3 as the spin doctors.</p> <p>4 A. Mm-hm.</p> <p>5 Q. When Alastair Campbell began to work for Tony Blair,</p> <p>6 what observations do you have about the way in which he</p> <p>7 dealt with the media in the late 1990s?</p> <p>8 A. I suppose Alastair Campbell was new to public relations,</p> <p>9 he'd been a Daily Mirror journalist. My observations,</p> <p>10 not at close hand but from a distance, based on dealing</p> <p>11 with the media, talking to journalists, was that</p> <p>12 Alastair got a bit carried away with the power that</p> <p>13 Tony Blair had at that time and possibly years later</p> <p>14 would have regretted the way he dealt with Fleet Street.</p> <p>15 Q. What way is that?</p> <p>16 A. Well, telling rather than asking. Ordering rather than</p> <p>17 discussing. Threatening rather than. That's the</p> <p>18 impression I got. You know, and everybody does things</p> <p>19 their own way. But, you see, it's very easy to be</p> <p>20 strong as a PR when you have something that everybody</p> <p>21 wants. For the five or ten minutes when your person,</p> <p>22 Tony Blair or whoever, is incredibly popular, you can do</p> <p>23 that, but that doesn't last and you have to remember</p> <p>24 that when you need friends and when you need to try and</p> <p>25 do the best you can for the people you're representing</p> <p style="text-align: center;">Page 74</p>	<p>1 editorial independence than those working to Mr Desmond,</p> <p>2 and you described Mr Dacre as being a law unto himself.</p> <p>3 A. Nothing's changed.</p> <p>4 Q. That was going to be my question, save, of course, the</p> <p>5 identity of some of the Murdoch editors.</p> <p>6 The next topic I'd like to ask you about is</p> <p>7 apologies and the prominence of apologies. There's been</p> <p>8 a lot of evidence from those who are being apologised to</p> <p>9 that they don't think the apologies are big enough or</p> <p>10 prominent enough. Is that a criticism that you would</p> <p>11 identify with?</p> <p>12 A. One hundred per cent. I think if you come out with</p> <p>13 a front page splash, which is then shown to be totally</p> <p>14 untrue, then the apology should be at least noted on the</p> <p>15 front page of that paper. It would be a very quick way</p> <p>16 of stopping an awful lot of front pages which shouldn't</p> <p>17 have come out. So I'm not saying dominating the page,</p> <p>18 but for example, at the bottom of the front page, "We</p> <p>19 got it wrong". Page 5, page 10, page 7, "We got it</p> <p>20 wrong." Clearly at the bottom of the page. So everybody</p> <p>21 that saw that piece, and much, much quicker, not months</p> <p>22 and months and months when everybody's forgotten it, but</p> <p>23 very quickly, okay, which is why a body like I talked</p> <p>24 about hopefully would do that, that is there, clearly</p> <p>25 for everybody to see. That's what I would like to see.</p> <p style="text-align: center;">Page 76</p>

<p>1 It won't happen, but I'd love to see it.</p> <p>2 Q. There was some discussion in 2003 in the Select</p> <p>3 Committee of the possibility of requiring advertisements</p> <p>4 with apologies to be printed not in a guilty paper, but</p> <p>5 in some of its rivals. Do you think that's a realistic</p> <p>6 idea?</p> <p>7 A. No, because the damning thing is -- they tend to --</p> <p>8 they're not going to have a go at each other, because</p> <p>9 they all do the same thing. You know, it's the readers</p> <p>10 that saw that. Plus, from your point of view, if you've</p> <p>11 been wrongly accused, wrongly exposed, wrongly -- then</p> <p>12 it's the people who read that you want to be seeing it</p> <p>13 was wrong. You know, because they're aware of it if you</p> <p>14 see what I'm saying. They're the ones you're concerned</p> <p>15 about. They're the ones that the damage has been done.</p> <p>16 So that's something again I've advocated for many, many,</p> <p>17 many years.</p> <p>18 Q. Finally, a witness earlier today, Heather Mills, in her</p> <p>19 witness statement has made reference to you. I'm going</p> <p>20 to read out the reference. It's not a matter which is</p> <p>21 likely to need to be adjudicated on in this Inquiry, but</p> <p>22 because it's been raised, I'm going to touch upon it and</p> <p>23 give you the opportunity to respond.</p> <p>24 Paragraph 21 of Heather Mills' statement says:</p> <p>25 "It was only when I would not give them the Paul and</p> <p style="text-align: center;">Page 77</p>	<p>1 press.</p> <p>2 A. When they get it wrong, yes.</p> <p>3 LORD JUSTICE LEVESON: When they get it wrong. I have</p> <p>4 received submission after submission in this room that</p> <p>5 anything that has a statute surrounding it will impact</p> <p>6 adversely on the freedom of the press and free speech,</p> <p>7 and I'd be very interested to know how you square that</p> <p>8 circle.</p> <p>9 A. I don't think that is the case. I think that the</p> <p>10 British public are increasingly disenchanted with the</p> <p>11 honesty of the British press and I think that something</p> <p>12 like this would help to restore their confidence, and if</p> <p>13 the British public were confident that they were getting</p> <p>14 a free, independent but honest press, then I think that</p> <p>15 that would be a plus, and a plus in the circulation</p> <p>16 battle as well.</p> <p>17 I think that the credibility of the British press</p> <p>18 has sunk in recent years, partly because of what's gone</p> <p>19 on with News of the World and News International. So</p> <p>20 I don't think so. I think that the more responsible and</p> <p>21 the more caring the British press, the better.</p> <p>22 I would also love to see good news in the British</p> <p>23 papers, because it helps to give the nation a lift.</p> <p>24 Unfortunately, it's very hard to get good news stories</p> <p>25 in the papers, and I'm talking about ordinary members of</p> <p style="text-align: center;">Page 79</p>
<p>1 I story that they turned on me in 1999. I remember</p> <p>2 getting a call from Max Clifford (who I had never heard</p> <p>3 of at the time) saying words to the effect of 'If you do</p> <p>4 not let me represent you as Paul's new girlfriend I am</p> <p>5 going to destroy you'. At the time I dismissed it not</p> <p>6 knowing he would go on to arrange for various people to</p> <p>7 sell lies about me for money."</p> <p>8 Is that allegation true?</p> <p>9 A. There's an awful lot of things I could say about Heather</p> <p>10 Mills, but I won't. It's totally untrue, 100 per cent</p> <p>11 untrue, without any true foundation at all.</p> <p>12 MR BARR: Thank you very much, Mr Clifford. Those were all</p> <p>13 my questions.</p> <p>14 LORD JUSTICE LEVESON: Mr Clifford, there are a couple of</p> <p>15 things you said that I'd like to just ask you about.</p> <p>16 You have spoken of the need, with which I entirely</p> <p>17 agree, for a free press.</p> <p>18 A. Mm-hm.</p> <p>19 LORD JUSTICE LEVESON: By which I apprehend you mean</p> <p>20 independent press with free speech.</p> <p>21 A. Yes. Yeah, a brave free press that is prepared to</p> <p>22 challenge and prepared to be controversial and stand up.</p> <p>23 Yes.</p> <p>24 LORD JUSTICE LEVESON: On the other hand, you speak about</p> <p>25 a body which has the power effectively to stop the</p> <p style="text-align: center;">Page 78</p>	<p>1 the public and the wonderful things that people do all</p> <p>2 over Britain every day, which will never ever be</p> <p>3 reported.</p> <p>4 So there's lots of things, but certainly I don't</p> <p>5 think that having a responsible body that is able to</p> <p>6 protect the excesses of the media would in any way be</p> <p>7 damaging to them or their freedom, and I think it would</p> <p>8 give them greater respect, and in the long term,</p> <p>9 possibly help the chances of their survival.</p> <p>10 LORD JUSTICE LEVESON: Inevitably, if it's going to have the</p> <p>11 force, the ability to be able to stop inaccuracy, it's</p> <p>12 going to have to be backed by some sort of legal</p> <p>13 sanction, otherwise --</p> <p>14 A. Well, I think obviously the law is still there, you</p> <p>15 know. Obviously it should be made so much easier. It</p> <p>16 should be legal aid for ordinary members of the public</p> <p>17 because they can't afford to take them on, so that would</p> <p>18 be changed, but of course people will always and do have</p> <p>19 the right to challenge.</p> <p>20 LORD JUSTICE LEVESON: Yes.</p> <p>21 A. So that, you know, if you've got it wrong and you're</p> <p>22 publicly admitting you've got it wrong, that's one</p> <p>23 thing. If someone then decides they want to sue you,</p> <p>24 they want to, then they have that opportunity.</p> <p>25 LORD JUSTICE LEVESON: There's no reason -- or do you think</p> <p style="text-align: center;">Page 80</p>

<p>1 there's a reason why you shouldn't be able to run 2 a complaints mechanism alongside taking action for libel 3 or whatever? 4 A. Not at all. Not at all. I mean, I think every 5 situation would be looked at in its own merits, the same 6 as everything that happens in the justice system in this 7 country with every other area. The one area where we 8 don't have that is the media. 9 LORD JUSTICE LEVESON: The other thing you've said -- I'll 10 just pick up something you've just said there. Some 11 sort of mechanism to resolve issues of privacy or libel 12 that was inquisitorial, in other words you don't have to 13 have two sides, you have somebody who sits in the middle 14 and tries to sort it out, that is quick and easy to use 15 and cheap, if not free, would that satisfy the sort of 16 requirement that you've just identified? 17 A. Yes. And I don't think they have to be cheap or 18 necessarily free, because I think it's an important part 19 in a democracy that ordinary members of the public get 20 protection because there's vast numbers out there and 21 they don't get protection, so -- but that person -- 22 LORD JUSTICE LEVESON: No, no, when I say cheap or free, 23 I mean free to use. 24 A. Yes. 25 LORD JUSTICE LEVESON: For the very reason you've Page 81</p>	<p>1 that particular story running. 2 A. If I remember rightly, and I'm not sure, I believe it 3 was Ian Edmondson, because at the time Ian was the news 4 editor, and the conversation was, "This is what 5 happened, so if I was you, I'd leave them alone." 6 I believe it was Ian Edmondson. Probably because he was 7 the news editor so he would have been right at the heart 8 of what was going on. 9 LORD JUSTICE LEVESON: The three people who might or might 10 not have been involved were the deputy editor, the news 11 editor and the chief reporter, Mr Thurlbeck. That's 12 merely a statement of fact, not -- 13 A. No, it wouldn't have been Neville Thurlbeck and it 14 probably wouldn't have been -- would it have been Neil 15 Wallis, the deputy editor? I think he was number two 16 under Andy Coulson. 17 LORD JUSTICE LEVESON: I think that's -- 18 A. It wouldn't have been him either. It would have been 19 probably then Ian Edmondson. It might have been someone 20 that worked for Ian Edmondson, because when I was no 21 longer dealing with the News of the World, the reporters 22 were phoning me all the time saying, "Max, can't you 23 sort out your differences with Andy Coulson, it's 24 driving us mad because we're chasing people all over the 25 world for them to say, oh, Max Clifford's looking after Page 83</p>
<p>1 identified. 2 A. And the public would be aware. They have a number. You 3 know, this is the emergency number when it comes to the 4 press. Not 999 but whatever you want to call it, they 5 can call it and they can get a response, and someone 6 could look after them. 7 I think that out of that and lots of other things as 8 well, you know, it makes for a much happier, healthier 9 media and a much happier, healthier public in this 10 country when it comes to the media. Much fairer, as 11 well. 12 LORD JUSTICE LEVESON: All right. You've touched upon 13 a story and indicated an involvement in the story which 14 has been the subject of a fair amount of evidence during 15 the course of the last few weeks, which is the way in 16 which the News of the World dealt with the story 17 surrounding Mr Max Mosley and you told me that you'd 18 become involved in the way in which you explained. 19 A. Mm-hm. 20 LORD JUSTICE LEVESON: We've heard most of the actors in 21 that drama, from the newspapers' perspective and indeed 22 from Mr Mosley, as well. What they have said is not 23 always consistent. I'd be very interested if you could 24 tell me to whom you spoke at the News of the World about 25 your client and who gave you the assurance that stopped Page 82</p>	<p>1 us", so it might have been one of those reporters who 2 then reported that back. 3 LORD JUSTICE LEVESON: All right. 4 A. But it probably was Ian Edmondson. 5 LORD JUSTICE LEVESON: All right. Thank you very much, 6 Mr Clifford. Thank you very much for the assistance 7 you've given me. 8 A. All right. 9 LORD JUSTICE LEVESON: Thanks. 10 MR BARR: Sir, as far as I'm aware, we're not ready for the 11 next witness because Mr Dacre hasn't arrived. 12 LORD JUSTICE LEVESON: No. 13 MR BARR: Indeed, he wasn't expected until 4.15. 14 LORD JUSTICE LEVESON: No. 15 MR BARR: In those circumstances, might I invite you to 16 consider rising? 17 Housekeeping 18 LORD JUSTICE LEVESON: Yes, well there are some things that 19 I think we could probably deal with over the next few 20 minutes. I'll want to say something after Mr Dacre has 21 finished, but not beforehand, although in the meantime 22 I think there are a number of further statements and 23 submissions that are to be taken as included within the 24 records. Is that right, Mr Jay? 25 MR JAY: Yes. A list of further statements will be put on Page 84</p>

<p>1 the website as soon as possible. These are statements 2 which have been circulated to the core participants. 3 There will be additional further statements, which will 4 be taken as read at a slightly later stage, probably at 5 the end of this month. 6 LORD JUSTICE LEVESON: Right. In that regard, I acknowledge 7 that I've received from Mr Mosley the product of the 8 work that he offered to undertake in relation to 9 regulation, and it seems to me these are entirely his 10 ideas, they're not factual evidence, they're 11 suggestions, and that the proper course is to take that 12 step with him as well. 13 But I am sure that as we go through the remaining 14 material, it's right that we decide what should go on 15 the web to make sure we have everything that we need. 16 MR JAY: Sir, yes. 17 LORD JUSTICE LEVESON: In that regard, there are some other 18 matters that everybody has to deal with, as we come to 19 the end of module one. They include submissions on 20 credibility, submissions on the law and submissions on 21 the matters which I raised on 16 November. 22 In relation to credibility, I don't know whether the 23 team has received any submissions. I'm sure I haven't 24 seen any. Similarly in relation to the other matters. 25 I understand that everybody's been working very hard</p> <p style="text-align: center;">Page 85</p>	<p>1 LORD JUSTICE LEVESON: Thank you very much. Mr Caplan, is 2 that all right for you? 3 MR CAPLAN: I hope and believe it will be. 4 LORD JUSTICE LEVESON: I'm very grateful. 5 The reason for doing it is this, and let me make it 6 abundantly clear. Because of the way this module is 7 cast, I do not believe that I am going to be deciding 8 very much about specific issues of credibility. There 9 will be some, I apprehend, but therefore I'm very keen 10 to receive people's submissions, because if I have to 11 comply with the requirements of Rule 13 of the Inquiry 12 Rules, then I want to be able to do so while the Inquiry 13 was proceeding, in order to ensure that it didn't hold 14 up the ultimate publication of a report at the end of 15 the Inquiry. I'm sure that everybody will understand 16 what I mean by that. 17 Mr Dingemans, you're probably conscious of the 18 points that I've been making and I hope that's all right 19 for you. 20 MR DINGEMANS: Yes, and we propose to put in short 21 submissions on credibility, law and one other matter. 22 LORD JUSTICE LEVESON: Thank you very much indeed. Some of 23 it, Ms Michalos, won't trouble the Metropolitan Police, 24 but to such extent as they do, I'd be interested to hear 25 what you have to say.</p> <p style="text-align: center;">Page 87</p>
<p>1 and I'm not in any sense being critical. It seems 2 sensible to extend the time for all these submissions to 3 24 February, although I'm still conscious that I haven't 4 received the opening submissions that Mr Sherborne 5 promised me I think well in advance of the end of 6 November. I'm not suggesting he's not been working 7 either, but the latitude that I've extended to him goes 8 further than I would naturally have wished, but there it 9 is. 10 Does anybody have any difficulty with that as 11 a general proposition? 12 MR WHITE: No, sir, that's very helpful. Our submissions 13 are in hand but we were having some difficulty meeting 14 today. 15 LORD JUSTICE LEVESON: I understand that, and indeed given 16 that we've had some evidence today, it would have been 17 impossible. That's why I think it's sensible for you to 18 take the time to get them right. 19 MR WHITE: Thank you very much. 20 LORD JUSTICE LEVESON: As you want to pursue them. 21 Mr Sherborne, I hesitate to ask you. 22 MR SHERBORNE: Sir, probably the less said the better on my 23 part, but I did explain to Mr Jay earlier that I would 24 provide them during the short break that we've been 25 afforded between module one and module two.</p> <p style="text-align: center;">Page 86</p>	<p>1 MS MICHALOS: Sir, yes. 2 LORD JUSTICE LEVESON: Thank you very much. Similar for the 3 National Union of Journalists? 4 MR HARRIS: That's fine. 5 LORD JUSTICE LEVESON: The Guardian? 6 MR SPEKER: We're on course to meet our deadline. 7 LORD JUSTICE LEVESON: Thank you very much indeed. I hope 8 I've not missed anybody out. 9 I will rise and allow everybody to get ready for 10 a comparatively brief final section of evidence. Thank 11 you. 12 (4.11 pm) 13 (A short break) 14 (4.14 pm) 15 LORD JUSTICE LEVESON: Thank you very much indeed, Mr Dacre. 16 I'm sorry you've been inconvenienced, but I'm sure you 17 understand why. Thank you. 18 MR PAUL DACRE (recalled) 19 LORD JUSTICE LEVESON: Right, yes. 20 Questions by MR SHERBORNE 21 MR SHERBORNE: Good afternoon, Mr Dacre. 22 Can I begin by taking a minute to explain why you're 23 back here, as there may be some misunderstanding about 24 it, given some of the reporting. As you know, the 25 reason is not, and I repeat not, because of some sort of</p> <p style="text-align: center;">Page 88</p>

<p>1 personal score between you and your newspaper on the one 2 hand and Mr Grant on the other. That's obviously not of 3 primary interest to the Inquiry. You understand that, 4 don't you?</p> <p>5 A. (Nods head).</p> <p>6 Q. And this is really about the bigger picture, as it were. 7 Can I start then by telling you what I'm not going to 8 deal with? I'm not going to deal with the events 9 surrounding the reporting of the birth of Mr Grant's 10 child, how journalists obtained private information from 11 the registry office and so on --</p> <p>12 MR CAPLAN: It's very clear the two topics that are going to 13 be dealt with. We raised it in front of you yesterday. 14 They are the two topics which were raised with you, and 15 I'm sorry to say but Mr Sherborne is rehearsing other 16 topics which never were in the purview of this further 17 evidence.</p> <p>18 LORD JUSTICE LEVESON: I think the probable answer, 19 Mr Sherborne, is to just crack on with the two topics.</p> <p>20 MR SHERBORNE: I am going to deal with the article about the 21 "plummy-voiced woman" that was published by 22 Associated Newspapers in February of 2007. 23 Can we begin with the article itself? We've 24 prepared a small bundle of documents for you; none of 25 them should be a surprise. Do you have a copy of that</p> <p style="text-align: center;">Page 89</p>	<p>1 supplementary statement. You see, I'm not sure you will 2 have that in your bundle. Can I hand up a copy? 3 I think I have a spare copy somewhere that I can hand 4 up. I have a very marked copy. (Handed).</p> <p>5 LORD JUSTICE LEVESON: I can ignore the markings as long as 6 I can follow what's going on. Thank you. Right.</p> <p>7 MR SHERBORNE: The real thrust of the story that we're 8 concerned about is to be found, Mr Dacre, in about four 9 paragraphs in the third column. Do you see?</p> <p>10 A. Yeah.</p> <p>11 Q. Starting with: 12 "Jemima has become convinced her 46-year-old 13 boyfriend is involved with a glamorous, young 14 Cambridge-educated film executive." 15 Now --</p> <p>16 A. Yes, fine, got it here.</p> <p>17 Q. I'm grateful. We don't have much time, so can 18 I summarise those four paragraphs. I think there's one 19 at the top there, then there's a second one and then 20 there's -- you can miss out the following ones because 21 they're about Drew Barrymore, and then the theme is 22 picked up again with the paragraph "But the truth is 23 Jemima was far more concerned". 24 Can I summarise those paragraphs in this way and see 25 if you accept it: there are two outstanding feature to</p> <p style="text-align: center;">Page 91</p>
<p>1 bundle, Mr Dacre?</p> <p>2 A. Yes, right.</p> <p>3 Q. You should find at tab 2, I think, page 13, although you 4 may, I think, have taken the article itself out of that 5 bundle, you may have a separate copy of it, but if you 6 could find a copy of that article, page 13, and can you 7 see there's the sub-headline on the right-hand side 8 talking about the flirtation with the glamorous film 9 executive?</p> <p>10 LORD JUSTICE LEVESON: Mr Sherborne, do I have a copy of 11 this?</p> <p>12 MR SHERBORNE: I would hope that your Lordship does. 13 I don't know, sir, whether you have the bundles that 14 were prepared by the Inquiry --</p> <p>15 LORD JUSTICE LEVESON: I have the bundle prepared by the 16 Inquiry.</p> <p>17 MR SHERBORNE: It should be in that bundle. If you give me 18 a moment, I can find which tab. I'm sorry, I've already 19 handed my copy of the little bundle we prepared for 20 Mr Dacre away. I think you will find it --</p> <p>21 LORD JUSTICE LEVESON: I'm keen to follow what you're 22 asking, that's all.</p> <p>23 MR SHERBORNE: And I'm keen that you're able to follow it as 24 well, sir. I think it's probably an exhibit to the 25 witness statement of Mr Grant, is it? To the second</p> <p style="text-align: center;">Page 90</p>	<p>1 this story. One is the repeated reference to Mr Grant's 2 use of mobile phones and mobile phone contacts between 3 him and this woman, and the second outstanding feature 4 is the repeated reference to the fact that this woman, 5 with whom he's accused of having a flirtation, sounded 6 posh or plummy. Would you take that from me?</p> <p>7 A. Yes, that's a very rough and ready shorthand version of 8 it, yes.</p> <p>9 Q. There are no fewer, I think, than eight references to 10 phones or phoning, and three or four references to this 11 other woman having a plummy voice of some description in 12 those four paragraphs. You see my point, Mr Dacre, is 13 this, that the clear emphasis of this story is on the 14 telephone contact that was taking place with this other 15 woman and what she sounded like. Do you follow?</p> <p>16 A. I'd rather put my own word on it. What are you going to 17 ask me, please?</p> <p>18 Q. Do you accept that those are the two outstanding 19 features --</p> <p>20 A. No, no, I mean this is three or four paragraphs in 21 a 2,000-word piece, so I can't really accept that that's 22 the summary.</p> <p>23 Q. But in relation to what is said about this film 24 executive, who, it is said, destroyed the relationship 25 between Jemima Khan and Hugh Grant, will you accept</p> <p style="text-align: center;">Page 92</p>

23 (Pages 89 to 92)

<p>1 those are the two key features?</p> <p>2 A. No, I won't. I'd rather you ask me questions and I will</p> <p>3 answer them. I'm not going to characterise them using</p> <p>4 your words.</p> <p>5 Q. Do you want me to take you through the article and show</p> <p>6 you each and every reference to a phone and a plummy</p> <p>7 voice?</p> <p>8 LORD JUSTICE LEVESON: I don't think it matters,</p> <p>9 Mr Sherborne. I think that I can read the article in</p> <p>10 its entirety and I would like the whole of the article</p> <p>11 so that I can read it, and then I will make a decision,</p> <p>12 if it's important, about the points that you're making,</p> <p>13 but they come out of the article rather than anything</p> <p>14 else, don't they?</p> <p>15 MR SHERBORNE: They do, sir, yes.</p> <p>16 LORD JUSTICE LEVESON: Right.</p> <p>17 MR SHERBORNE: Let's deal with what we know, Mr Dacre. We</p> <p>18 know that no such woman as described in your article</p> <p>19 existed, don't we?</p> <p>20 A. Firstly, let me just put it in some kind of context.</p> <p>21 This article was in the Mail on Sunday, all right? It</p> <p>22 has its own autonomous editor, as I made clear to the</p> <p>23 Inquiry earlier in the week, and I think you already</p> <p>24 spent a great deal of time with our legal director and,</p> <p>25 indeed, him discussing this. I, however, am now</p> <p style="text-align: center;">Page 93</p>	<p>1 putting in documents which Mr Dacre hasn't seen and he's</p> <p>2 now being shown for the first time while giving his</p> <p>3 evidence. That was the whole point of agreeing that any</p> <p>4 further documentation would come to Mr Dacre by</p> <p>5 lunchtime yesterday so that if any further research was</p> <p>6 needed to be done, he needed to acquaint himself with</p> <p>7 any archived information, he could do so.</p> <p>8 LORD JUSTICE LEVESON: All right. I'm not sure it's going</p> <p>9 to help. I don't mind seeing a letter, I don't think</p> <p>10 it's necessarily appropriate to put it to Mr Dacre</p> <p>11 because it's going to a slightly different issue.</p> <p>12 MR SHERBORNE: Well, it is, because what Mr Dacre is</p> <p>13 suggesting is that Mr Grant didn't make any point about</p> <p>14 this at this time. That's what I was dealing with. It</p> <p>15 wasn't meant to be part of the examination of Mr Dacre,</p> <p>16 but I'll move on.</p> <p>17 LORD JUSTICE LEVESON: All right, yes.</p> <p>18 MR SHERBORNE: So you accepted, as part of the settlement,</p> <p>19 that there was no such woman at Warner Brothers;</p> <p>20 correct?</p> <p>21 A. Correct.</p> <p>22 Q. Correct. What we do know now, because we've had</p> <p>23 a statement from Patricia Owens, who was the</p> <p>24 plummy-voiced film production company assistant that</p> <p>25 Mr Grant referred to in his evidence, who was leaving</p> <p style="text-align: center;">Page 95</p>
<p>1 prepared to talk about it.</p> <p>2 I think the central thing we have to say about this,</p> <p>3 whatever is in the article and whatever is in those four</p> <p>4 paragraphs, we admitted at the time we got it wrong, we</p> <p>5 paid your client modest damages, so in that sense</p> <p>6 anything referring to this article, it's already been</p> <p>7 acceded that it's wrong.</p> <p>8 Q. Exactly. It's been conceded that there was no such</p> <p>9 executive at Warner Brothers --</p> <p>10 A. And at the time we conceded it was wrong, Mr Hugh Grant</p> <p>11 insisted that he didn't know at all any woman of this</p> <p>12 description, and that was the basis on which our</p> <p>13 settlement was made.</p> <p>14 Q. Why do you say that, Mr Dacre?</p> <p>15 A. Well, because that's what happened.</p> <p>16 Q. Isn't it right, Mr Dacre, that at the time that he</p> <p>17 complained about this article, he did refer to</p> <p>18 a personal assistant --</p> <p>19 A. No, I don't think so. At that time he insisted that he</p> <p>20 knew of no such woman and that no woman existed of that</p> <p>21 kind.</p> <p>22 Q. Can I hand you up a letter before action that was sent</p> <p>23 by his solicitors --</p> <p>24 MR CAPLAN: I'm sorry to interrupt. This is exactly the</p> <p>25 type of situation I wanted to forestall yesterday,</p> <p style="text-align: center;">Page 94</p>	<p>1 messages for him at the time, we do know that there was</p> <p>2 that person, don't we?</p> <p>3 A. Well, I repeat, in our settlement at that time, it is my</p> <p>4 understanding that Mr Grant's position was that he knew</p> <p>5 no woman of any kind as described in this piece.</p> <p>6 For the life of me, I can't understand the</p> <p>7 consistency of your argument. Seems to me you're saying</p> <p>8 that the true woman that eventually he realised we're</p> <p>9 referring to, even though he hadn't remembered at the</p> <p>10 time of our settlement, at this Inquiry, hey presto, he</p> <p>11 conveniently remembers that it could have been, it could</p> <p>12 have been a plummy-voiced woman in California, a PA of</p> <p>13 middle age. If we'd been hacking into his phone, why,</p> <p>14 in this article, even though we've said it wasn't true</p> <p>15 and it accepted it wasn't true, why was the woman who</p> <p>16 referred to a Cheltenham Ladies School educated lady</p> <p>17 who'd been to Cambridge, she was now a senior executive</p> <p>18 at Warners in London. It doesn't make sense, with all</p> <p>19 possible respect.</p> <p>20 Q. I really don't have a lot of time, Mr Dacre, so I'd</p> <p>21 prefer it, if you can, to restrict your answers to the</p> <p>22 questions that I've put to you as opposed to questions</p> <p>23 that I might put to you. So can we come back to my</p> <p>24 question: have you seen Ms Owens' witness statement or</p> <p>25 not?</p> <p style="text-align: center;">Page 96</p>

<p>1 A. This is the PA in California?</p> <p>2 Q. This is the executive assistant in the film production</p> <p>3 company in California, yes.</p> <p>4 A. Yes, I've seen that, yes.</p> <p>5 Q. And you've seen that she confirms that she was leaving</p> <p>6 messages late at night about meetings and that they</p> <p>7 might have been understood by someone who had been</p> <p>8 listening in, who didn't know the context, as being</p> <p>9 a bit flirtatious, a bit jokey. You've seen she said</p> <p>10 that, yes?</p> <p>11 A. Mm.</p> <p>12 Q. Okay, so we know there was no woman at Warner Brothers,</p> <p>13 there was no source to this story, but there does happen</p> <p>14 to have been a woman who was leaving messages at the</p> <p>15 time on Mr Grant's phone; correct?</p> <p>16 A. That is what you are saying, yes. I am saying that, as</p> <p>17 editor-in-chief of Associated Newspapers, who had looked</p> <p>18 into this matter -- I wasn't the editor of the paper</p> <p>19 concerned -- I've spoken to the editor who assures me --</p> <p>20 and I know what you're trying to say, that he was using</p> <p>21 phone hacking. He categorically denies it, as I</p> <p>22 categorically denied it the other day. He assures me</p> <p>23 that this piece was obtained by legitimate journalistic</p> <p>24 methods. He has explained to you and it's been</p> <p>25 explained to this Inquiry that the author of the piece,</p> <p style="text-align: center;">Page 97</p>	<p>1 A. I've no idea.</p> <p>2 Q. -- with Mr Grant at the time.</p> <p>3 A. Frankly, I have absolutely no idea and I don't know what</p> <p>4 you're trying get at, I really honestly don't, with</p> <p>5 great respect.</p> <p>6 Q. Rather than look at what I'm trying to get at, why don't</p> <p>7 you answer the question, Mr Dacre? Have you read her</p> <p>8 statement in which she says exactly what I just put to</p> <p>9 you?</p> <p>10 A. I haven't got it to hand. I did read it a couple of</p> <p>11 nights ago. I can't actually recall the exact --</p> <p>12 Q. You read it a couple of nights ago?</p> <p>13 A. Yes.</p> <p>14 Q. You didn't read it today at all?</p> <p>15 A. I know this may astonish you, but I'm editor-in-chief of</p> <p>16 a major publishing group, I've had major board meetings,</p> <p>17 I've had very considerable staffing issues to do and I'm</p> <p>18 trying to edit my paper. So yes, I read it two nights</p> <p>19 ago, but I have actually done some homework today on</p> <p>20 this subject.</p> <p>21 Q. So what I'm putting to you, Mr Dacre, is that although</p> <p>22 she didn't work for Warner Brothers, she did work for a</p> <p>23 film production company associated with Warner Brothers.</p> <p>24 Do you just accept that?</p> <p>25 A. If you say it's in the statement, I will accept it.</p> <p style="text-align: center;">Page 99</p>
<p>1 Katie Nicholl, the diary editor of the Mail on Sunday,</p> <p>2 wrote this piece drawing on evidence provided to her by</p> <p>3 Sharon Feinstein, a long-time, very experienced senior</p> <p>4 showbusiness writer expert, who in turn drew some of her</p> <p>5 material from a source in the Grant camp, who she had</p> <p>6 used before and had always found to be impeccably</p> <p>7 accurate. In this instance it wasn't, and that was the</p> <p>8 basis of this article, or these three paragraphs in the</p> <p>9 article.</p> <p>10 Q. Mr Dacre, we're going to get through this much quicker</p> <p>11 if you just answer my questions.</p> <p>12 A. I can't --</p> <p>13 Q. I promise you there'll be plenty of time to make the</p> <p>14 points that you want to make.</p> <p>15 So let's come back to the details which you say</p> <p>16 don't quite match the description of Ms Owens in the</p> <p>17 article, because I think you mentioned one or two in one</p> <p>18 of your previous answers. Let's take them very quickly</p> <p>19 in turn, if I may.</p> <p>20 You say that the woman in the article is said to</p> <p>21 work for Warner Brothers and Mrs Owens doesn't work for</p> <p>22 Warner Brothers. That's right? Well, technically she</p> <p>23 doesn't, but you accept, don't you, Mr Dacre, that she</p> <p>24 does work with a production company associated with</p> <p>25 Warner Brothers that was making a film --</p> <p style="text-align: center;">Page 98</p>	<p>1 Q. Indeed. And the other point you make, and Ms Hartley</p> <p>2 makes in, I think, one of her statements, is that</p> <p>3 Mrs Owens is not a senior executive in the film</p> <p>4 industry. That's one of your points as well, as is</p> <p>5 described in the article.</p> <p>6 A. Yeah, okay, then.</p> <p>7 Q. But you do accept, don't you, that she was executive</p> <p>8 assistant to the president of the film production</p> <p>9 company? Will you accept that?</p> <p>10 A. Is this in her statement?</p> <p>11 Q. Yes.</p> <p>12 A. I must take your assurance for it then.</p> <p>13 Q. The one point you mentioned only moments ago is you say</p> <p>14 that the woman in the article is described as having</p> <p>15 been educated at Cheltenham's Ladies College in</p> <p>16 Cambridge, whereas Mrs Owens wasn't. That's your point,</p> <p>17 isn't it?</p> <p>18 A. It says in the article, that she was, yes, that the lady</p> <p>19 who we accepted didn't exist, and who Mr Grant said</p> <p>20 didn't exist, and we accepted we got it wrong and paid</p> <p>21 modest damages.</p> <p>22 Q. Mr Owens tells us in her statement that she obviously is</p> <p>23 English, she was educated at college in Surrey and,</p> <p>24 critically, she has what people might describe as a posh</p> <p>25 or plummy voice.</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 A. But it didn't originally -- it didn't exist originally 2 when we paid the damages, the modest damages to 3 Mr Grant. 4 Q. I think the last point that is made by 5 Associated Newspapers trying to distance itself from 6 Mrs Owens is that the article itself doesn't mention any 7 voicemail messages. Do you remember Ms Hartley said 8 that? 9 A. Mm. 10 Q. Can I just deal with that point? There are two answers 11 to that, aren't there, Mr Dacre? First is this: you 12 wouldn't expect the article to mention voicemails 13 explicitly, would you, even if they'd been listened to? 14 A. I don't know where this conversation is leading to, 15 Mr Sherborne, but -- 16 Q. If you can just answer the questions, maybe we'll get to 17 where it's leading much quicker. 18 A. I've told you already that this lady, either of your 19 ladies, Mr Grant denied existed when we paid him 20 damages. At this Inquiry, he suddenly, hey presto, out 21 of a hat produces a rabbit that it must have been this 22 lady. 23 Q. Will you answer my question now? 24 A. Sorry, could you remind me what it was? 25 Q. Of course I can.</p> <p style="text-align: center;">Page 101</p>	<p>1 Q. -- to comment on Mr Mohan's evidence. 2 A. -- I don't see the relevance to this -- the three 3 paragraphs in this article, with the greatest of 4 respect. 5 LORD JUSTICE LEVESON: I understand the point, Mr Sherborne, 6 but actually you're simply asking Mr Dacre to comment, 7 and this is really a speech, with respect. 8 MR SHERBORNE: What I'm asking Mr Dacre to do is to consider 9 the source of this article, because what I'm going to 10 come on to do is to ask him about how he was able to 11 publish the statement that he did on 22 November that 12 Mr Grant (overspeaking) -- 13 A. I did not publish it! It was in the Mail on Sunday, it 14 was the Mail on Sunday -- 15 LORD JUSTICE LEVESON: No, no, Mr Dacre, actually I think 16 this article you did. 17 A. Oh, we've moved on? I apologise, I apologise to you. 18 LORD JUSTICE LEVESON: I understand the point, but it's very 19 important that Mr Dacre be asked to deal with the facts 20 and then you can argue the inferences to such extent as 21 it matters and we can do that at leisure. 22 MR SHERBORNE: You see, Mr Dacre, the short point is this 23 isn't it a coincidence that at the very time of this 24 article -- 25 A. Which article are we talking about now?</p> <p style="text-align: center;">Page 103</p>
<p>1 A. Yeah. 2 Q. Isn't the answer to your suggestion that there is no 3 reference in this article to voicemail messages at all 4 that you wouldn't expect there to be because, of course, 5 listening to voicemail messages is a criminal offence? 6 A. Well, clearly, yes, Mr Sherborne. 7 Q. And it's precisely the answer that there's no reference 8 to voicemail messages here that Mr Mohan gave when he 9 was recalled on Tuesday to deal with similar pieces in 10 the Sun which looked like the product of phone hacking. 11 Did you hear his evidence? 12 A. I didn't hear his editor -- his evidence, and I deeply 13 resent your comparison to my paper. 14 Q. You see, isn't the truth this, as Mr Jay put to 15 Mr Mohan, and I'll quote him faithfully: 16 "The article doesn't refer to voicemails, but there 17 is a lot of information in it obtained in or around 18 knowing what is happening in telephone calls, isn't 19 there?" 20 A. I can't answer this question. I don't understand it, 21 I don't know where you're getting to. I'm not prepared 22 to comment on Mr Mohan's evidence. I haven't read it, 23 I haven't examined it -- 24 Q. I'm not asking you -- 25 A. -- and I don't -- I don't see --</p> <p style="text-align: center;">Page 102</p>	<p>1 Q. The one that should still be -- 2 A. Not in the Sun? 3 Q. The one that should still be in front of you. 4 LORD JUSTICE LEVESON: I think everything is back to the 5 Mail on Sunday. 6 A. Right. So, as I said, not an article I placed in the 7 paper. 8 MR SHERBORNE: I understand that, but you have explained now 9 more than once that you've investigated it and that 10 you've had people investigate these matters for the 11 purposes of the statement that was put out in November 12 of last year. 13 So perhaps I can ask you again: isn't it a bit much 14 of a coincidence that at the very time of this article 15 about the flirtation with a posh film industry woman 16 that there was a plummy-voiced Englishwoman, who was an 17 executive assistant in the film industry, who was 18 leaving Mr Grant silly or flirtatious messages on his 19 voicemail late at night about meeting up about a Warner 20 Brothers film? Do you understand what I mean by that? 21 A. I'm not going to comment on coincidences. 22 Q. But in these circumstances, Mr Dacre, can you honestly 23 be 100 per cent certain, having looked into it, that 24 this story was not based on information which had 25 somehow been accessed from Mr Grant's voicemails?</p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

1 **A. I can be as confident as any editor, having made**
 2 **extensive enquiries into his newspaper's practices and**
 3 **held an inquiry, that phone hacking was not practised by**
 4 **the Daily Mail or the Mail on Sunday. You know that**
 5 **because I gave my unequivocal, unequivocal assurances**
 6 **earlier in this week.**
 7 Q. You see, Mr Mohan, the editor of the Sun -- you
 8 mentioned other editors -- had to accept that he
 9 couldn't be 100 per cent sure that none of his
 10 journalists or freelancers -- remember this is
 11 a freelance story -- that none of his journalists --
 12 **A. No, it was a freelance story that was written by a staff**
 13 **person talking to senior freelancers, yes.**
 14 Q. That none of his journalists or freelancers hadn't
 15 obtained any of their stories?
 16 **A. Yes, I can be very confident because those journalists**
 17 **are journalists of integrity, we've used them in our**
 18 **group for years and the source I have told you of**
 19 **Ms Feinstein had been impeccably accurate in the past.**
 20 Q. And Mr Wallis also said he couldn't be sure.
 21 **A. I'm not going to speak for other newspapers. I will**
 22 **speak for Associated Newspapers and I've told this**
 23 **Inquiry, I cannot be any more unequivocal, that all my**
 24 **enquiries and all the evidence I've received, and having**
 25 **spoken to the editor of my group: our group did not hack**
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1 **phones, and I rather resent your continued insinuations**
 2 **that we did.**
 3 Q. Can we come on to Ms Khan? You'll remember that
 4 Jemima Khan was forced to make a statement because when
 5 you put out the press release in November of last year,
 6 which contained the "mendacious smears" allegation, you
 7 suggested that the source of the story had come from
 8 Ms Khan herself. Do you remember that?
 9 **A. I didn't suggest, no.**
 10 Q. Do you want to have a look at the statement that, as
 11 I understand it, you authorised being put out in
 12 November.
 13 **A. What, in the paper?**
 14 Q. Yes.
 15 **A. I'm sorry, I thought you meant in our witness**
 16 **statements. Yes, I recall, yes.**
 17 Q. And you've seen that she's sworn a statement denying
 18 that she was the source?
 19 **A. But look, it is absolutely irrelevant. I'm sorry. We**
 20 **got this bit of the story wrong. We apologised in open**
 21 **court. We paid, we paid modest damages to rectify the**
 22 **situation, very quickly, as it happens. Therefore**
 23 **Ms Khan, much as I respect her, is swearing on a story**
 24 **that we had conceded was wrong.**
 25 Q. But do you accept there are only two -- what I'm
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1 concerned with is how you can have satisfied yourself so
 2 that you could be 100 per cent sure, as you say you are,
 3 that there was nothing tainted about the source of this
 4 story. That's what I'm asking you about.
 5 **A. I told you, having spoken at length to the editor of the**
 6 **Mail on Sunday, who has spoken to this Inquiry -- I'm**
 7 **not quite sure why you didn't grill him as much on**
 8 **this -- that I am satisfied that legitimate journalistic**
 9 **methods were used to obtain the source for the basis of**
 10 **these three paragraphs.**
 11 Q. But do you see why I ask you this, because there are
 12 only two options, Mr Dacre.
 13 **A. I'm not going to speculate. I'm not going to be drawn**
 14 **by your innuendo. I've made clear my position and I'm**
 15 **not going to deviate from that.**
 16 LORD JUSTICE LEVESON: I'd like to ask a different question,
 17 because I am not going to make a decision, I think,
 18 about the precise source of this story. I am not going
 19 to make a finding of any sort about where this story
 20 came from. At least that's my present view.
 21 The concern that I had and the only real concern
 22 that I had was that Mr Grant came here and said --
 23 I think he used the word "speculate", I think he meant
 24 "infer", having had an idea that this might have come
 25 from hacking. That's how he put it, and I think he
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1 said, "I'd love to hear the different explanation."
 2 **A. Mm-hm.**
 3 LORD JUSTICE LEVESON: And you on behalf of the Mail were
 4 absolutely entitled to say, "He can think, he can infer
 5 what he wishes, he can think what he likes, he's
 6 entitled to, but he's wrong. It didn't; it came from
 7 another source." Fine. If that's what had been said,
 8 then I for one would have pushed the whole thing away.
 9 But the story that came out contained within it
 10 "Mr Grant is guilty of a mendacious smear". He is
 11 deliberately lying, that's what it means. In other
 12 words, he's made a conscious decision, knowing perfectly
 13 well it's not true, to say it on oath.
 14 I was concerned about that word, that's all. For
 15 me, that's the only thing here.
 16 **A. Could I then respond to that?**
 17 LORD JUSTICE LEVESON: Please.
 18 **A. This needs to be put in a context and I thought I'd done**
 19 **some of it the other day and I'd like to amplify it, I'm**
 20 **grateful for the time.**
 21 **First of all, let's go back to that first day of the**
 22 **Inquiry. It was an extraordinary occasion, an**
 23 **extraordinary day. There's never been an inquiry like**
 24 **this before, it was being televised, it was being beamed**
 25 **around the world. It was a unique occasion.**
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<p>1 Mr Grant, the poster boy for Hacked Off, is giving 2 evidence on the first day, an international film star. 3 He makes his allegation. It wasn't an innocent piece of 4 evidence; it had been drawn out of him by the Inquiry. 5 He makes it. He hadn't included it in his witness 6 statement. He knew, I would suggest, the damage it 7 would cause.</p> <p>8 After all, allegations of phone hacking have closed 9 down a newspaper and has resulted in the loss of work by 10 hundreds and hundreds of journalists. It was explosive 11 and it was toxic and he, as a very sophisticated 12 communicator, he deals with the press all his life, knew 13 the damage it would cause.</p> <p>14 What he omitted to tell this court, what he omitted 15 to tell you, was that he had made these allegations in 16 a much firmer form before and our legal department had 17 put him on notice that they were not accurate and that 18 we'd written to his representatives making that clear. 19 That is why I used the word "mendacious" statement.</p> <p>20 I'd now like to take on the context of the actual 21 day. I think I explod -- I explained to you that I was 22 driving back from an appointment, the lead item on the 23 four o'clock news on the BBC was that another newspaper 24 group had been dragged into the phone hacking scandal. 25 Actor Hugh Grant had accused -- accused, not speculated,</p> <p style="text-align: center;">Page 109</p>	<p>1 LORD JUSTICE LEVESON: Mr Dacre, I wouldn't go down this 2 particular route, because I'll make my own judgment 3 about the transcript of Mr McMullan's phone call. I'm 4 going to have to read that.</p> <p>5 A. All right, but fair enough, but Mr McMullan told the 6 Inquiry later, as I'm sure you know, that he wasn't 7 referring to phone hacking in the Daily Mail, the fact 8 we were one the highest payers --</p> <p>9 LORD JUSTICE LEVESON: I know. I know what he said and 10 I have to read --</p> <p>11 A. Okay, well I just wish that Mr Grant had checked with 12 Mr McMullan as to what he meant. You've read that, 13 we've heard it, and it was certainly my hearing that he 14 rebutted quite satisfactorily that would suggest it was 15 dealing with phone hacking.</p> <p>16 LORD JUSTICE LEVESON: All right.</p> <p>17 A. Number 3: 18 "We need a full public inquiry into all the methods 19 and cultures of the British tabloid press because one of 20 the things that will emerge is that it wasn't just the 21 News of the World; it was all the tabloids ..."</p> <p>22 This is a man who's been put on notice by our legal 23 department that we deny this categorically. 24 "... including the ones that purport to have family 25 values, shorthand the Daily Mail, have been enthusiastic</p> <p style="text-align: center;">Page 111</p>
<p>1 not suggested, not inferred -- this is modern journalism 2 shorthand -- had been accused -- I'm sorry, had accused 3 my group of being involved in phone hacking. I cannot 4 tell you how damaging that was to our group.</p> <p>5 But, as I said, he made this statement before so if 6 you just bear with me because it's very important. On 7 7 July 2011 Mr Grant told the House of Lords that the 8 Hacked Off -- at the launch of the Hacked Off campaign: 9 "Private investigator Glenn Mulcaire worked 10 70 per cent of his time for the News of the World and 11 30 per cent for the Daily Mail."</p> <p>12 That is untrue and false. I have carried out 13 a major internal inquiry into our payments and our 14 computers. We have never paid any payments to 15 Mr Mulcaire. I repeat, Ms Hartley rang Mr Grant's 16 representative, told him of this, and denied that we as 17 a company hacked phones.</p> <p>18 Then another quote, 6 July 2011: 19 "Well, according to Paul McMullan, the ex News of 20 the World features editor, who I interviewed 21 surreptitiously and I published the article in the 22 newspapers, he says it was every tabloid on Fleet Street 23 who were enthusiastic phone hackers, going right up to 24 the ones with the highest moral standards like the 25 Daily Mail" --</p> <p style="text-align: center;">Page 110</p>	<p>1 and rabid phone hackers. That was an interview on the 2 Radio 4 World at One.</p> <p>3 And lastly, this was to the Prime Minister, a report 4 in the Financial Times: 5 "The actor, meeting the Prime Minister for the first 6 time since the phone hacking scandal blew up over the 7 summer, said he 'knew for a fact' that 'six or seven 8 newspapers had been involved in phone hacking'."</p> <p>9 Clearly that would by implication have included the 10 Daily Mail. That is untrue and false. So it was in 11 that background we'd already told him it wasn't true, 12 that we felt we had to respond even more robustly. 13 I say I'd heard that on the 4 o'clock news, I had 14 a consultation with my legal department, the editor of 15 the Mail on Sunday, we agreed that we'd tried to be 16 reasonable, we'd tried to explain to him that this was 17 not true and that we needed to fight fire with fire on 18 this.</p> <p>19 Now, your Honour's made the very good point -- could 20 I have a glass of water?</p> <p>21 LORD JUSTICE LEVESON: Please.</p> <p>22 A. Your Honour made the point, rather than rushing out that 23 press statement -- and I want to explain in a minute, 24 I felt we had to be as robust as possible and fight fire 25 with fire because it was such a damaging accusation --</p> <p style="text-align: center;">Page 112</p>

28 (Pages 109 to 112)

<p>1 your Honour said, "Well look, why didn't you go back,</p> <p>2 you know, listen to -- read the evidence and come out</p> <p>3 with a more reasoned response?" I think you just</p> <p>4 repeated that.</p> <p>5 With the greatest possible respect, I don't think</p> <p>6 you understand the speed of and the ability to set the</p> <p>7 agenda and create a firestorm of 24-hourly bulletin</p> <p>8 instant news. If we had allowed that to get traction,</p> <p>9 it would have taken off. The implications for that</p> <p>10 story would have gone down that the Daily Mail had been</p> <p>11 accused of fucking -- of hacking phones. As it was, we</p> <p>12 put that statement out, by the 6 o'clock television</p> <p>13 news, the news which actually sets the agenda, a much</p> <p>14 more balanced version was being presented using our very</p> <p>15 strong rebuttal, high in the news, and it was no longer</p> <p>16 leading the news, and we were happy with that balance.</p> <p>17 That's why I felt we had to act in the robust way we</p> <p>18 did.</p> <p>19 LORD JUSTICE LEVESON: Mr Dacre, I might follow all that --</p> <p>20 and I'm not taking this time off Mr Sherborne -- I might</p> <p>21 follow all that and I could quite understand it, but</p> <p>22 I raised the matter and I identified my concern, and</p> <p>23 I can see the point you make, I understand that and I'll</p> <p>24 look at the correspondence if you want me to look at it,</p> <p>25 but even then, even weeks later when Ms Hartley gave</p> <p style="text-align: center;">Page 113</p>	<p>1 not going to descend into the micro detail, because if</p> <p>2 I did that, I would never finish in relation to every</p> <p>3 single story for every single newspaper. It is, in any</p> <p>4 event, part 2 of the Inquiry.</p> <p>5 A. I accept the point your Honour makes.</p> <p>6 LORD JUSTICE LEVESON: All right.</p> <p>7 MR CAPLAN: Could I just invite you to consider the time?</p> <p>8 I understand that Mr Sherborne should have some more,</p> <p>9 but before your conversation with Mr Dacre started, it</p> <p>10 was 4.40 pm. I was about to --</p> <p>11 LORD JUSTICE LEVESON: With great respect, Mr Caplan,</p> <p>12 Mr Sherborne asked a question, Mr Dacre was very keen to</p> <p>13 make quite a lengthy statement. I understand that, and</p> <p>14 I wasn't going to stop him and Mr Sherborne didn't stop</p> <p>15 him, but this is why I didn't tie it down. There has to</p> <p>16 be the fair chance for Mr Sherborne to put what he wants</p> <p>17 to put to him and I'm sorry, I understand the point but</p> <p>18 I'm not going to let it just dribble away.</p> <p>19 Right, yes, Mr Sherborne.</p> <p>20 MR SHERBORNE: Perhaps I can return to my point. Very</p> <p>21 quickly, can I deal with one thing, Mr Dacre.</p> <p>22 In your investigations into this article, can you</p> <p>23 explain whether you discovered the reason that no</p> <p>24 contact was made with either Mr Grant or Jemima Khan</p> <p>25 prior to the article being published?</p> <p style="text-align: center;">Page 115</p>
<p>1 evidence and we went back onto the word "mendacious",</p> <p>2 which is the only word in it which actually somebody is</p> <p>3 going to argue to me is reflective of there isn't</p> <p>4 a reverse gear here, there's only a forward gear,</p> <p>5 Ms Hartley was abundantly clear that the Mail did not</p> <p>6 retract that word or reduce the impact of that word at</p> <p>7 all, and that's why I've been concerned about it.</p> <p>8 A. I do understand that, I really do understand that, but</p> <p>9 one of the definitions of the word "mendacious" is</p> <p>10 "false", and I can't help but feel that in the context</p> <p>11 of those four occasions when Mr Grant had slandered the</p> <p>12 Daily Mail, and we'd made it clear to him that we hadn't</p> <p>13 been up to the activities he was alleging, that he knew</p> <p>14 it was false. He must have read our witness statements,</p> <p>15 which we again repeated there was no phone hacking at</p> <p>16 our group --</p> <p>17 LORD JUSTICE LEVESON: I know what the argument is going to</p> <p>18 be. The argument may be that this might easily have</p> <p>19 come that way without necessarily the knowledge of the</p> <p>20 writer of your article. I'm not going to resolve that</p> <p>21 issue. I've tried to explain to you -- and I'm not</p> <p>22 going to take the time off Mr Sherborne -- what bothered</p> <p>23 me, what caused me to feel that it was right to allow</p> <p>24 this issue to be ventilated, because it's whether</p> <p>25 I derived something from it on the wider picture. I'm</p> <p style="text-align: center;">Page 114</p>	<p>1 A. I can't remember. Did it carry an answer from a quote,</p> <p>2 a representative in the piece?</p> <p>3 Q. It didn't. Mr Grant's already explained in his witness</p> <p>4 statement there is no contact with either him or</p> <p>5 Ms Khan. The reason I ask you is this: as you know,</p> <p>6 you're well-known for having said to the Select</p> <p>7 Committee in I think April 2009 that in 99 out of 100</p> <p>8 cases newspapers contact the subject of a story prior to</p> <p>9 it, and I'm asking you this, Mr Dacre. I hope you won't</p> <p>10 disagree that that's what you said. I'm asking you</p> <p>11 this: do you know the reason why contact was not made</p> <p>12 with Ms Khan or Mr Grant prior to the article?</p> <p>13 A. I don't want to be evasive. I don't know that it</p> <p>14 wasn't. I know I perhaps should know that, but I don't</p> <p>15 know that it wasn't.</p> <p>16 MR CAPLAN: I'm not going to keep rising up, it's very</p> <p>17 unattractive, but the paragraph says halfway through the</p> <p>18 article "a spokesman for the couple would make no</p> <p>19 comment".</p> <p>20 A. Exactly, I thought I'd read that. Sorry.</p> <p>21 MR SHERBORNE: In your settlement of this action, your</p> <p>22 newspaper group agreed to the fact that no attempt was</p> <p>23 made to contact either Mr Grant or Ms Khan prior to the</p> <p>24 story being published.</p> <p>25 A. Well --</p> <p style="text-align: center;">Page 116</p>

<p>1 Q. I'm simply --</p> <p>2 A. -- I don't know whether it said that. I haven't seen</p> <p>3 that, as --</p> <p>4 Q. Mr Dacre, please let me get to the end of a question</p> <p>5 before you answer it. Did you or did you not</p> <p>6 investigate whether or not contact had been made and why</p> <p>7 it was --</p> <p>8 A. I will do what -- Mr Caplan just read out the relevant</p> <p>9 quote which I just said "A spokesman for the couple</p> <p>10 would make no comment on their relationship last night,</p> <p>11 saying neither party is prepared to make a statement.</p> <p>12 This is a private matter."</p> <p>13 And that's quite high up in the copy so I'm very</p> <p>14 happy that correct journalistic procedures were carried</p> <p>15 out.</p> <p>16 MR SHERBORNE: Rather than seeking the assistance of</p> <p>17 Mr Caplan, perhaps I can take you to the small bundle</p> <p>18 that is in front of you. Turn to tab 2, please. Can</p> <p>19 you look at page 8.</p> <p>20 A. You're not going to believe this, but I don't have</p> <p>21 a tab 2. I have a tab 3.</p> <p>22 Q. Let me hand you --</p> <p>23 A. Hang on. Could it be this?</p> <p>24 Q. Page 8. This is a statement which was read out with the</p> <p>25 consent of your newspaper group. Two paragraphs up from Page 117</p>	<p>1 under threat because of this mystery woman who didn't</p> <p>2 exist when we put it to Mr Grant later --</p> <p>3 MR SHERBORNE: The question is not whether you can read the</p> <p>4 article, Mr Dacre. I asked you whether you investigated</p> <p>5 this. Yes or no, please.</p> <p>6 A. Yes, of course, I investigated it and I said to you</p> <p>7 before Mr Caplan got up I thought a spokesman had spoken</p> <p>8 to our newspaper.</p> <p>9 MR SHERBORNE: You said you didn't know. You said you</p> <p>10 didn't know.</p> <p>11 Can I ask you this. This is all about Mr Grant's</p> <p>12 belief, do you understand? Mr Grant's belief at the</p> <p>13 time that he gave the evidence. Can I just remind you</p> <p>14 of something? You said in one of the statements that</p> <p>15 you made to Lord Justice Leveson a short while ago that</p> <p>16 this was not referred to in Mr Grant's witness</p> <p>17 statement. We know it was. Will you accept from me</p> <p>18 that that was why Mr Jay asked him questions about the</p> <p>19 plummy-voiced woman story?</p> <p>20 LORD JUSTICE LEVESON: All right.</p> <p>21 MR SHERBORNE: Will you accept that?</p> <p>22 LORD JUSTICE LEVESON: Let's move on. I'll see.</p> <p>23 MR SHERBORNE: I can give you --</p> <p>24 LORD JUSTICE LEVESON: No, not know.</p> <p>25 MR SHERBORNE: I can give you the note, sir, in the Page 119</p>
<p>1 the bottom, can I read you this:</p> <p>2 "At no stage were any of the above allegations or</p> <p>3 factual assertions put to the claimant prior to</p> <p>4 publication."</p> <p>5 A. Yes, well, they clearly literally and technically</p> <p>6 weren't. They went through his spokesman who said they</p> <p>7 weren't prepared to comment.</p> <p>8 Q. They weren't put to him and as Mr Grant has said they</p> <p>9 weren't put to Ms Khan. Have you investigated that?</p> <p>10 Rather than rely on Mr Caplan --</p> <p>11 A. I'm not going to answer any more questions on this</p> <p>12 particular point. We quite clearly state quite high up</p> <p>13 in the copy that the journalist concerned put these</p> <p>14 allegations to the spokesman for the couple and it</p> <p>15 quotes that neither party -- she or he is quoted as</p> <p>16 saying neither party is prepared to make a statement.</p> <p>17 LORD JUSTICE LEVESON: Actually, that's not quite right,</p> <p>18 Mr Dacre, because what the spokesman was asked about was</p> <p>19 to comment on their relationship. That's the</p> <p>20 relationship between Jemima Khan and Hugh Grant, not</p> <p>21 whether or not Hugh Grant was speaking to a woman --</p> <p>22 I'll look at the documentation.</p> <p>23 A. It comes two paragraphs after that, with respect, your</p> <p>24 Honour. On their relationship, comment on their</p> <p>25 relationship, ie their relationship which was seemingly Page 118</p>	<p>1 statement, paragraph 17.</p> <p>2 LORD JUSTICE LEVESON: Thank you very much indeed, I'll</p> <p>3 certainly find that.</p> <p>4 MR SHERBORNE: You see, Mr Grant made it clear that the</p> <p>5 basis for his speculation as to whether the story might</p> <p>6 have been the product of listening to his voicemails was</p> <p>7 the fact, as I've explained, about the plummy-voiced</p> <p>8 woman that he knew about and about what Mr McMullan said</p> <p>9 to him, in the conversation that he taped without</p> <p>10 Mr McMullan knowing it. Do you remember? Will you</p> <p>11 accept now that that was his basis for the speculation?</p> <p>12 A. I can accept that, but I find it very difficult in the</p> <p>13 context of the previous statements he made in which we</p> <p>14 had categorically refuted to his spokesman, sent him an</p> <p>15 email, that he would know that that couldn't be so.</p> <p>16 MR SHERBORNE: So you accept, though, that that was his</p> <p>17 basis, that that was his honest basis for inferring that</p> <p>18 there may have been some listening in to his voicemail?</p> <p>19 A. I think Mr Grant was obsessed by trying to drag the</p> <p>20 Daily Mail into another newspaper's scandal, and that</p> <p>21 his strategy was to try to do that.</p> <p>22 Q. Isn't this just an example, Mr Dacre, of attack being</p> <p>23 the best form of defence?</p> <p>24 A. With the greatest respect, you're attacking my group</p> <p>25 rather unpleasantly and I'm going to defend it. I love Page 120</p>

30 (Pages 117 to 120)

<p>1 it, I've worked very hard for it for 20 years of my life</p> <p>2 and I'm proud of our newspapers. When people attack</p> <p>3 them, I defend them.</p> <p>4 Q. You see, this is the point, Mr Dacre. If rather than</p> <p>5 listen to what was put out on the radio you had actually</p> <p>6 read the transcripts of what Mr Grant had said, you</p> <p>7 would have realised that he was not attacking the</p> <p>8 Daily Mail or the Mail on Sunday --</p> <p>9 A. I cannot agree with that. It was being reported on the</p> <p>10 airwaves --</p> <p>11 Q. Mr Dacre, it is 5 to 5, please let me finish my</p> <p>12 question. You would have realised that he was not</p> <p>13 attacking your newspaper group; he was simply in</p> <p>14 response to Mr Jay's question explaining what his</p> <p>15 speculation was?</p> <p>16 A. With great respect, I suggest that's a disingenuous</p> <p>17 interpretation of events. He knew very well how toxic</p> <p>18 that allegation would be made, that suggestion. I tried</p> <p>19 to explain that at some length.</p> <p>20 Q. It was your newspaper group, Mr Dacre, that made the</p> <p>21 allegation, one that was picked up and repeated</p> <p>22 throughout the media that he had lied on oath. Will you</p> <p>23 accept that?</p> <p>24 A. I accept that the mendacious smear was, yes, it was</p> <p>25 reported.</p> <p style="text-align: center;">Page 121</p>	<p>1 Mr Grant's statement. Can I just say I'm not going to</p> <p>2 go to it now, could I please for the record and for your</p> <p>3 note invite you to look at paragraph 11, because</p> <p>4 I believe --</p> <p>5 MR SHERBORNE: Sorry, it's 11.</p> <p>6 MR CAPLAN: It's under the libel section of Mr Grant's</p> <p>7 statement.</p> <p>8 MR SHERBORNE: Yes, sorry, it's 11 not 17.</p> <p>9 LORD JUSTICE LEVESON: Thank you very much indeed.</p> <p>10 Right, I have that. Yes, I've seen it. Thank you.</p> <p>11 Thank you very much, Mr Dacre. Thank you.</p> <p>12 A. Thank you very much.</p> <p>13 LORD JUSTICE LEVESON: What I'm about to say may not cause</p> <p>14 you pleasure, but it's a consequence of what you've said</p> <p>15 a couple of times, once at the seminar and then again</p> <p>16 during the course of your evidence.</p> <p>17 I shall be returning to the question of how the</p> <p>18 press should move forward, and it will be the constant</p> <p>19 theme of my Inquiry until the end, because I see it as</p> <p>20 an iterative process. I think it's very important that</p> <p>21 it is iterative, because I will ask questions and make</p> <p>22 suggestions that people think about things in order</p> <p>23 specifically so that the industry can do so, and then</p> <p>24 respond. In that way, we may get somewhere that</p> <p>25 satisfies all the requirements that I believe will be in</p> <p style="text-align: center;">Page 123</p>
<p>1 Q. Will you not withdraw it even now, Mr Dacre, and</p> <p>2 apologise for the "mendacious smears" lie?</p> <p>3 A. I will withdraw it, as I said the other day to this</p> <p>4 Inquiry, if Mr Grant withdraws his repeated statements</p> <p>5 about the Daily Mail, I will withdraw my "mendacious</p> <p>6 smear", sir, without hesitation, yes.</p> <p>7 Q. Mr Dacre, I'll give you one last opportunity --</p> <p>8 LORD JUSTICE LEVESON: No, we --</p> <p>9 MR SHERBORNE: I already explained that Mr Grant shared with</p> <p>10 this Inquiry his speculation, because he was asked to do</p> <p>11 so by Mr Jay. Will you now withdraw your allegation of</p> <p>12 mendacious smears?</p> <p>13 A. I've said what I will do. I'm very happy to withdraw it</p> <p>14 if Mr Grant withdraws his -- not allegations, not</p> <p>15 suggestions, but his repeated statements about the</p> <p>16 Daily Mail.</p> <p>17 Q. I think that tells us something, doesn't it, Mr Dacre,</p> <p>18 about the culture, practices and ethics of the press?</p> <p>19 A. Well that's ...</p> <p>20 MR CAPLAN: Just for the record --</p> <p>21 LORD JUSTICE LEVESON: You're entitled to ask Mr Dacre some</p> <p>22 questions, if you want to.</p> <p>23 MR CAPLAN: I don't propose to.</p> <p>24 LORD JUSTICE LEVESON: Very good.</p> <p>25 MR CAPLAN: Mr Sherborne referred to paragraph 17 of</p> <p style="text-align: center;">Page 122</p>	<p>1 the public interest and that others believe the press</p> <p>2 will embrace.</p> <p>3 Therefore, it may be that some of those ideas will</p> <p>4 require or would benefit from your input, and I hope</p> <p>5 that you will be prepared to provide it.</p> <p>6 A. Your Honour, I think I've shown this week that I'm</p> <p>7 prepared to devote a lot of time to this issue.</p> <p>8 LORD JUSTICE LEVESON: I'm very grateful.</p> <p>9 A. I've spent a lot of time with it.</p> <p>10 May I just make one additional observation, do you</p> <p>11 mind, just to finish off?</p> <p>12 Very quickly. Many American websites have been</p> <p>13 carrying stories about Mr Grant and other celebrities</p> <p>14 because -- that Mail Online can't carry because it</p> <p>15 adheres to the code. This is quite an important point.</p> <p>16 Last week saw the announcement of potentially the</p> <p>17 biggest floatation in the stock market history, that of</p> <p>18 Facebook. Mark Zuckerberg, the owner of Facebook, has</p> <p>19 gone on record by saying that people no longer expect</p> <p>20 privacy in the Internet age. If the mainstream media in</p> <p>21 Britain is unable to address news stories that are</p> <p>22 freely available elsewhere, we will look increasingly</p> <p>23 irrelevant especially to younger people.</p> <p>24 I only say this because I said to you earlier that</p> <p>25 this week Mail Online became the world's biggest website</p> <p style="text-align: center;">Page 124</p>

<p>1 with over 100 million unique users and that's eloquent 2 evidence that there is a huge demand for British 3 journalism globally. 4 The fact that it is called the World Wide Web is 5 literally true, and the centre of the global newspaper 6 business is the not the UK now, it's no longer the UK, 7 but the US. In that sense the Internet is the 8 embodiment of the first empire and I would ask that the 9 editor of the Mail Online put in a paper to this Inquiry 10 to outline the huge problems that the Internet poses 11 both for the printed press and regulation. 12 LORD JUSTICE LEVESON: If the editor of the Mail Online 13 wants to submit some evidence to the Inquiry, I'd be 14 perfectly willing to receive it and to take it on board 15 and possibly to call him -- 16 A. I do think it's one of the fundamental problems. 17 LORD JUSTICE LEVESON: And possibly to call him. 18 A. That would be very valuable. We would welcome that. 19 LORD JUSTICE LEVESON: I do understand the different 20 position of Twitter, which of course has a different 21 dynamic for all sorts of reasons. Your stories couldn't 22 be conveyed in 140 characters. 23 A. That's a matter of opinion. 24 LORD JUSTICE LEVESON: And that alters the dynamic, and 25 there is a very interesting distinction to be drawn</p> <p style="text-align: center;">Page 125</p>	<p>1 assistance that I can get to ensure that the most 2 satisfactory solution is available to everybody. 3 A. Excellent. Thank you for your time. Thank you. 4 LORD JUSTICE LEVESON: Thank you very much. 5 There is something that I want to say before we 6 conclude. 7 Today is I think, according to the records I have, 8 the 40th day of hearings, and this marks, at least 9 provisionally, the end of module one. I say 10 provisionally, because it's quite clear that there will 11 be some further material that enters the Inquiry record 12 and may require oral evidence to deal with this crucial 13 relationship between the press and the public, not least 14 of which the whole issue of regulation to which we have 15 just been referring. 16 For those who are interested, I would like to 17 recognise the progress we've made so far. We have 18 actually heard from 184 witnesses, and the statements of 19 42 other witnesses have been read into the record. 20 In the circumstances, I would like to pay tribute to 21 all those who have allowed us to do that. It's 22 obviously a tribute to the co-operation which the 23 Inquiry has received from those who are core 24 participants. It's my personal gratitude for the 25 assistance we've received from the Inquiry's legal team</p> <p style="text-align: center;">Page 127</p>
<p>1 between a conversation that two people might have in 2 a pub or in a private place on the one hand and 3 a newspaper always, and the question is: is 4 communicating with friends on Twitter nearer the 5 conversation in the pub or with friends or in a hall in 6 a debate with friends or the journalistic product of 7 a newspaper, which carries with it a kitemark of 8 integrity, honesty, accuracy, or should do, and how you 9 try and -- 10 A. But that would be competing with American websites that 11 don't observe that kitemark. 12 LORD JUSTICE LEVESON: Well -- 13 A. I'd ask you to call the editor of the Mail Online, he'd 14 relish answering these questions. I would only say that 15 it was Twitter that fuelled the Jan Moir debate and some 16 of the vicious and vile things that were said on that 17 would distress you, I suspect. In that sense, it's not 18 an innocent conversation between friends in a pub. It's 19 used -- some celebrities have Twitter followings of 3, 4 20 million. 21 LORD JUSTICE LEVESON: I understand the problem. 22 A. Okay, I'm sorry. 23 LORD JUSTICE LEVESON: I have my own problems without trying 24 to solve everybody else's. I take the point, 25 I understand it, and I'm very pleased to receive any</p> <p style="text-align: center;">Page 126</p>	<p>1 and the support staff that has done so much to ensure 2 that we have the right papers, usually, in the right 3 place at the right time. Everybody working to very 4 tight deadlines. 5 I'm grateful for the work done by the assessors, who 6 continue to fulfil their role by providing thoughtful 7 advice and comment in their areas of expertise, and so 8 help inform the questions that are asked. 9 I'm conscious that I've kept my foot very firmly on 10 the accelerator and that that's caused difficulty to all 11 manner of people. Our work will progress in the next 12 two weeks and we'll look at the contributions that have 13 been received from others, including the many 14 contributions, I think something approaching 600 15 contributions, onto the general enquiries website, all 16 of which will be analysed, some of which will be put 17 into statement form and put into the records. In other 18 words, I am seeking still to obtain as much evidence as 19 I can from as many people as I can. 20 The foot will continue to be applied to the 21 accelerator. We'll start module two in two weeks' time, 22 and then proceed ultimately to module three, but as 23 I say, we are likely to come back to various of the 24 issues that we've identified. 25 I'll end by also thanking all those who have</p> <p style="text-align: center;">Page 128</p>

32 (Pages 125 to 128)

<p>1 contributed to the work of the Inquiry by giving 2 evidence, and the obvious work that's been put into the 3 statements that have been prepared, whether voluntarily 4 or with some encouragement under the relevant statute. 5 Thank you all very much. 6 (5.06 pm) 7 (The hearing adjourned until Monday, 27 February 2012) 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p> <p style="text-align: center;">Page 129</p>	

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