

<p>1 Tuesday, 26 June 2012</p> <p>2 (10.00 am)</p> <p>3 LORD JUSTICE LEVESON: Yes, Mr Barr.</p> <p>4 MR BARR: Sir, good morning. Our first witness today is</p> <p>5 Mr John Lloyd.</p> <p>6 LORD JUSTICE LEVESON: Thank you very much.</p> <p>7 MR JOHN NICOL FORTUNE LLOYD (affirmed)</p> <p>8 Questions by MR BARR</p> <p>9 MR BARR: Mr Lloyd, could you confirm your full name,</p> <p>10 please.</p> <p>11 A. It is John Nicol Fortune Lloyd.</p> <p>12 Q. Are the contents of your witness statement true and</p> <p>13 correct to the best of your knowledge and belief?</p> <p>14 A. I believe so, yes.</p> <p>15 LORD JUSTICE LEVESON: Mr Lloyd, thank you very much indeed.</p> <p>16 I have said to all of the witnesses, if not all, that</p> <p>17 I am very grateful to them for the obvious work they</p> <p>18 have put into the questions we have asked and the</p> <p>19 contribution they have made and you are no different to</p> <p>20 the others; thank you.</p> <p>21 A. Thank you.</p> <p>22 MR BARR: You are a contributing editor to the</p> <p>23 Financial Times, where you have had a long history</p> <p>24 reporting on industrial and labour issues as</p> <p>25 a correspondent in east and central Europe and in the</p> <p style="text-align: center;">Page 1</p>	<p>1 First of all, would you agree that a fundamental</p> <p>2 role for a free press is to hold power to account?</p> <p>3 A. Yes, I would.</p> <p>4 Q. And it is to discover the truth on questions of public</p> <p>5 interest?</p> <p>6 A. Yes.</p> <p>7 Q. And that if facilitates and promotes democratic debate?</p> <p>8 A. Yes, I do.</p> <p>9 Q. Is there anything else you would wish to add to that</p> <p>10 list?</p> <p>11 A. Only to say that discovery of the truth is always</p> <p>12 difficult because truth in public affairs, as in</p> <p>13 private, is very complex and many journalists and</p> <p>14 commentators and others believe that truth is no longer</p> <p>15 possible, or never has been possible in journalism.</p> <p>16 I believe it is an aim that can be never be achieved.</p> <p>17 Rather like the holy grateful, it is there as a spur to</p> <p>18 endeavour rather than something that can be</p> <p>19 accomplished. But it is important to journalism because</p> <p>20 that, I think, is the reason why journalism exists and</p> <p>21 why it claims certain privileges.</p> <p>22 Q. I've had the benefit of reading your book, "What the</p> <p>23 Media are doing to our Politics". In that book and also</p> <p>24 in your witness statement, you make references to</p> <p>25 practises in other countries. At the bottom of page 4</p> <p style="text-align: center;">Page 3</p>
<p>1 former Soviet Union. You are a founding member of the</p> <p>2 weekend FT magazine and more recently a contributing</p> <p>3 editor; is that right?</p> <p>4 A. That's right.</p> <p>5 Q. You are also the director of journalism at the Reuters</p> <p>6 Institute for the study of journalism at the University</p> <p>7 of Oxford. Could I ask you, please, to tell us a little</p> <p>8 bit more about the Reuters Institute?</p> <p>9 A. The Reuters Institute was founded on top of an</p> <p>10 existing -- for some 30 years -- fellowship programme,</p> <p>11 which Reuters had funded, which brings journalists in</p> <p>12 mid-career, mainly from other countries, in Britain to</p> <p>13 Oxford for one, two or three academic terms, at which</p> <p>14 time they study, reflect on journalism and do a project.</p> <p>15 We built some six years ago -- the co-founders built</p> <p>16 on top of that what essentially is a think tank on</p> <p>17 journalism. It doesn't teach, it has no students, but</p> <p>18 it researches issues in journalism with a large</p> <p>19 international flavour.</p> <p>20 Q. Your statement is taken as read and so I shall ask you</p> <p>21 only here and there to expand. Can I do so first at</p> <p>22 paragraph 8 of your witness statement, where you talk</p> <p>23 about the essential part that a free press plays in</p> <p>24 a democratic state. Perhaps we can explore that</p> <p>25 a little bit.</p> <p style="text-align: center;">Page 2</p>	<p>1 of your witness statement, you talk about the</p> <p>2 relationship between politicians and proprietors in the</p> <p>3 United States. Perhaps you could distill, in a few</p> <p>4 words, the differences in that relationship, in the</p> <p>5 United States compared to this country?</p> <p>6 A. Yes, as in the statement, it was a conversation with</p> <p>7 an old friend who was editor of the New York Times</p> <p>8 called Joe Lelyveld, who, when I asked him about this,</p> <p>9 said that newspaper groups, including his own, the</p> <p>10 Ochs Sulzberger Group, which has owned for some time the</p> <p>11 New York Times -- the relationship between newspaper</p> <p>12 owners and indeed newspaper editors and politicians was</p> <p>13 one which was quite formal and distant compared with the</p> <p>14 UK, which Lelyveld knows well because he was</p> <p>15 a correspondent here for some years.</p> <p>16 Distant, and any attempt he said by politicians to</p> <p>17 make some kind of deal -- even, in the Prime Minister's</p> <p>18 words, a grand deal -- between them and the newspaper</p> <p>19 would certainly not be countenanced and would never be</p> <p>20 tried.</p> <p>21 The one exception he gave was Mr Murdoch, whose Fox</p> <p>22 channel and whose tabloid paper, the New York Post, did</p> <p>23 have much closer relationships, especially in the case</p> <p>24 of Fox News, with politicians of the right, the Tea</p> <p>25 Party in the Republican party. But apart from that,</p> <p style="text-align: center;">Page 4</p>

<p>1 relationships, according to Lelyveld, were much more 2 formal and distant and correct than they were in the 3 United Kingdom. 4 Q. In relation to France, you describe in your book a very 5 different approach to political interviewing to the one 6 that we are used to in this country. Could you 7 summarise the differences for us, please? 8 A. I think the different is that France, in a way, is even 9 more -- there is more entanglement between politicians 10 and journalists than there is even more than in the UK 11 and much, much more than in the US. That is that as in 12 Italy and other cultures, journalists quite often -- 13 especially political journalists -- adhere to 14 a particular political current and to particular 15 political characters and are, in a way, part of their 16 circle. So it is more collusive, much more collusive 17 than it has been in this country, much more than in the 18 United States. 19 I think it is less the case now but has been the 20 case that when a politician -- indeed, when a public 21 figure -- is interviewed, say in Figaro or Le Monde, the 22 interview is then passed to the politician or public 23 figure for his or her approval, or at least comment, so 24 that the interviewee can then amend or correct the 25 interview after it has been given. Page 5</p>	<p>1 it usual in France for the whole of the interview to be 2 published, or just a selection? 3 A. Much more -- I think rarely it would be the whole 4 interview because they are often pages and pages, but 5 much more of the interview is published. In news 6 stories, certainly in the serious papers like Figaro and 7 Le Monde and Les Echos, the politicians are quoted much 8 more and at greater length in a news story. So a news 9 story about a political issue would typically contain 10 perhaps two, three paragraphs of direct quotes. Here, 11 that is much rarer. 12 Q. In your opinion, which model serves the public interest 13 better: the French model of publishing more extensively 14 and less selectively, or the British model, the 15 Anglo Saxon model, of being more selective? 16 A. I think in that particular instance the French is 17 better. I think it is better to hear at greater length 18 what politicians say, rather than the soundbite -- the 19 soundbites to which they are now reduced. 20 I think in general, the French press has been overly 21 deferential. It is much less so now. It has been much 22 more concerned with, if you like, questions of ideology, 23 even philosophy. The origins of the French political 24 press are much more in polemic debate and ideological 25 argument, whereas the Anglo Saxon and British are much Page 7</p>
<p>1 That, in this country, would rarely be done. If it 2 were done, it would never be admitted. 3 Q. Is there a difference in the usual tone of such 4 interviews? 5 A. Yes. Generally, it has been the case -- one has to say 6 that the presidency of Mr Sarkozy marked a profound 7 difference, I think, and many French writers have marked 8 that. Before then, it is well known that the private 9 lives of politicians in France -- Mr Dominique 10 Strauss-Khan immediately clearly comes to mind in this, 11 but others too -- could enjoy an immunity from any 12 publication of the details of their private life, even 13 though, as is often the case, journalists knew them or 14 suspected them. 15 So private life, until Sarkozy, was something quite 16 apart. Sarkozy marked a difference, because he 17 coincided with the power of the Internet and there was 18 much gossip and revelation on the Internet, which 19 sometimes passed into the press. So now I think the 20 French press is in a transition between a period where 21 they marked a very sharp difference between public and 22 private -- the way that our press and the American press 23 used to do, some decades ago -- to one where it is 24 closer to what they would call the Anglo Saxon. 25 Q. Returning to the substance of political interviews, is Page 6</p>	<p>1 more fact-based, even, to an extent, scandal-based. So 2 the two have been quite different. There are is now 3 a certain amount of coming together. I would still 4 prefer, I think, the Anglo Saxon approach. 5 Q. We may return to this a little later, but one final 6 question before I move on this: would you agree with me 7 that a choice between these two approaches is a matter 8 for culture and not for regulation? 9 A. Very substantially, yes. 10 Q. You touch, on page 5 of your witness statement, at the 11 bottom of paragraph 10, on issues of plurality and 12 cross-media ownership, observing that in recent decades 13 there has been a light touch. Do you have any views on 14 where the balance lies between encouraging investment on 15 the one hand and plurality and competition on the other? 16 A. Increasingly now, I think it becomes a difficult issue 17 and Ofcom, as you will have seen in the last few days, 18 has pronounced on this and said that to mandate 19 pluralism, perhaps of the kind -- although it didn't 20 refer to this -- that the leader of the opposition 21 mentioned, I think in evidence here, is extremely 22 difficult, difficult to get right and difficult to 23 balance, as you put it, between the needs of investment 24 and the needs of pluralism. 25 Most countries, however, I think have some -- either Page 8</p>

<p>1 regulation or general bias to believing that the greater 2 the spread of ownership in newspapers and in television 3 channels, media generally, the better. In some 4 cultures -- again, America comes most to mind because it 5 is so city-based and therefore the companies tend to be 6 city-based -- there is much greater pluralism than 7 others where you have a centralised national press -- 8 nearly all the papers now -- national papers -- are 9 coming from London -- and the tendency for large groups 10 to have several papers, several media holdings. 11 So I think it is difficult to legislate. My bias 12 would be towards as much pluralism as possible. 13 Q. Do you have any view about whether regulation in this 14 sphere is best done by reference to specific percentages 15 of ownership or on a more subjective test, taking into 16 account all relevant factors? 17 A. I think if any regulator were to make such decisions the 18 regulator would have to use both approaches. It would 19 have to be partly subjective but it also would have to 20 bear in mind the needs of investment and so forth. 21 I think that were a regulator to come into this area -- 22 indeed they do, of course -- the Competition 23 Commission -- issues of press are referred to that -- 24 then they should bear in mind that a spread of ownership 25 is valuable.</p> <p style="text-align: center;">Page 9</p>	<p>1 those organisations that have a public trust, but on the 2 other, running a newspaper these days is not necessarily 3 terribly profitable enterprise. 4 A. Yes. 5 LORD JUSTICE LEVESON: And therefore there has been to be 6 a reason why people do it. 7 A. Yes. 8 LORD JUSTICE LEVESON: To try to get that balance right is 9 not entirely straightforward. 10 A. It is exactly the case, and increasingly what one sees 11 and will see more of, I think -- and again, this is more 12 evident in the United States -- is groups of business 13 people or indeed one business person buying a newspaper, 14 or indeed creating a newspaper, in order to propound 15 their views. 16 There is a very well known example in San Diego, 17 where a wealthy businessman, who is a hotel owner, 18 created a new newspaper there when the long established 19 newspaper failed and said that he and his editors were 20 strong Republicans, on the right of the Republican 21 party, and that the editorial would reflect that and 22 that he expected his editors, his reporters, his 23 commentators, to reflect his views. 24 I think that, which had been, after all, the model 25 of the press back in the 18th and 19th centuries, may</p> <p style="text-align: center;">Page 11</p>
<p>1 But also it depends hugely upon who buys it. 2 I mean, one of the examples that we have of press 3 ownership here is by a man who had been an officer in 4 the Russian -- Soviet state security, the KGB, but his 5 ownership of the newspapers, the Independent, 6 Independent on Sunday and Evening Standard, and of his 7 holdings in Russia, especially Novaya Gazeta, has been, 8 by all accounts and by my experience, exemplary. 9 So a lot depends, I think, on observing the way in 10 which newspaper owners and media owners observe what 11 many believe to be a public trust, and that can come 12 from a big company -- I believe that the Financial Times 13 for which I worked for many years -- that Pearson, which 14 is a very large publishing company, does have that view, 15 that its press ownership is a public trust. 16 Other companies don't have that view, have a much 17 more interventionist approach, where the owner's 18 opinions are much more a part of the newspaper's 19 editorial output. They would not, I think, maybe go as 20 far as Lord Beaverbrook, former owner of Express 21 newspapers, who said his newspapers were purely for the 22 purposes of propaganda, but they would go some way 23 towards that. 24 LORD JUSTICE LEVESON: There is a difficult balance here, 25 isn't there, Mr Boyd, because on the one hand there are</p> <p style="text-align: center;">Page 10</p>	<p>1 well return, since, as you say, an owner has to have 2 some reason for maintaining a newspaper, if not profit. 3 LORD JUSTICE LEVESON: Well, that is itself rather 4 concerning, isn't it? 5 A. Yes, except if you think that then the media becomes 6 a kind of agora in which a number of opinions -- left, 7 right, liberal, conservative -- can clash. That, I 8 guess, has been, to some extent at least, the model, the 9 theoretical model, in western democracies. 10 LORD JUSTICE LEVESON: But the risk then is -- and I use 11 a phrase which is not mine but has been used -- that 12 there is a race to the bottom, because in order to sell 13 your newspapers, you have to take certain lines about 14 types of story which are going to sell and give you the 15 opportunity to ventilate your views on topics that will 16 not necessarily be quite so saleable. 17 A. That's not the model, I think, of the tabloids. The 18 tabloids' essential existence is to make money, and now 19 that they are becoming much less profitable or even 20 making a loss, then the raison d'etre of tabloids 21 particularly becomes much more shaky. But the existence 22 of newspapers which to propound a particular worldview 23 is, to some extent at least, independent of their sales 24 and profitability. 25 A well known example, a notorious example, is of</p> <p style="text-align: center;">Page 12</p>

<p>1 Henry Ford, who founded the Dearborn Independent in the 2 30s in order, essentially, to promote his anti-semitic 3 views. He kept that going at a huge loss, but then he 4 was a hugely wealthy man, and it went, I think, until 5 the outbreak of war. 6 So increasingly, I think, one will see wealthy 7 individuals with a strong worldview or particular view, 8 coming into the marketplace and starting a publication 9 of some sort in order to propound their view. One could 10 argue that both Fox News and MSMBC -- if you like, the 11 left wing equivalent in the United States -- are such 12 vehicles. 13 Q. If you turn now to page 6 of your witness statement, 14 please, paragraph 13. There you make a point that 15 others have made, namely there has been a reduction in 16 recent years away from the simple political reporting 17 and more towards commentary. Your book put some 18 statistics on this, saying that in the early part of the 19 millennium a government official had counted 221 20 political commentators and was still counting. Is that 21 a trend that has continued to date? 22 A. I would think so. I mean, one of the jokes that is 23 common among journalists is that comment is free but 24 facts are expensive. It obviously is the case that the 25 more one invests in discovering information, especially</p> <p style="text-align: center;">Page 13</p>	<p>1 politics, including about politics in many, many 2 countries. So anyone who wishes to be well-informed 3 about German politics, which is a good subject to be 4 well-informed about these days, only has to go on the 5 net to the Spiegel in English and other websites in 6 English. The same is true in many countries where the 7 language is not English. One can be hugely 8 well-informed simply by surfing the net and learning 9 which sites tell you what information, and certainly one 10 can be hugely well-informed about British politics in 11 the same way. 12 So the volume of information available to people, at 13 least the majority of people who have an internet 14 connection, is enormously increased. In newspapers, it 15 tends to have decreased. 16 Q. Do you think that there has been a trend towards fusing 17 fact and comment in political reporting? 18 A. Yes, much more so. I mean, if one looks at the reports, 19 say, typically, of the Times, which did probably the 20 most political reporting of the 50s and 60s, and sees 21 (1) the length and (2) the care with which facts are 22 treated, and now compares that with the current Times 23 and other papers, then one sees how much, almost 24 unconsciously now, journalists will inject, if not an 25 opinion of the kind this is good or this is bad, but</p> <p style="text-align: center;">Page 15</p>
<p>1 that reporting which is called investigative and may 2 take a long time, a good deal of travel, for no rapid 3 result, clearly is much more expensive than formula 4 stories which can be done on the day, and is more 5 expensive even than an expensive and well-paid 6 commentator, because that commentator would fill a fair 7 amount of space and though he or she may have a high 8 income, it would be a good deal less than an 9 investigative report would command. 10 So the trend in newspapers which are increasingly 11 cash-strapped then does tend towards both commentary 12 and, if you will, light journalism. You might want to 13 come back to this -- journalism which depends a great 14 deal on public relations. 15 So I think the trend towards commentary of various 16 kinds, not necessarily political commentary, will 17 continue. 18 Q. If pure political factual reporting is on the decline, 19 has the overall volume of political fact which has been 20 reported, even if it is mixed in with comment -- has 21 that increased or decreased? 22 A. Greatly increased, and greatly increased not in 23 newspapers, where it has tended to decline, I believe 24 but on the net. So the net now gives more information 25 than any person can possibly absorb, including about</p> <p style="text-align: center;">Page 14</p>	<p>1 much more of a forecast, that X has happened and this 2 will mean that -- this will have this effect. 3 So in one way, reporting has become more ambitious 4 about making forecasts based upon the events it is 5 describing, and it is usually the case that in the tone 6 of the reportage, one can guess the political -- social 7 position or political position of the reporter. That 8 would be true, I think, in papers of the left, the 9 Guardian, the Mirror and so on -- certainly the 10 Mirror -- and of papers of the right, where the approval 11 or disapproval of the reporter or analyst is fairly 12 clear from the report. 13 Q. Has this trend towards mixed fact and comment come at 14 the expense of accuracy or not? 15 A. That would take, as academics say, a good deal of 16 research. But I would imagine two things: (1), it 17 would be unlikely that reports now are more inaccurate. 18 The reason I say that is that it is much, much easier to 19 check. In the course of my time in journalism, checking 20 has gone from a rather laborious finding a book, finding 21 a reference book, which may or may not be in the 22 newspaper, library, or going somewhere to check -- say 23 Companies House to check companies' records, which 24 meant, of course, an expenditure of time and therefore 25 one wrote less.</p> <p style="text-align: center;">Page 16</p>

<p>1 Now all kinds of tools are available at the touch of 2 a mouse. So it is much easier to check and I think -- 3 I would imagine that my colleagues in all newspapers, 4 assuming that they do check -- and I think most of them 5 do -- probably get things more right than they used to. 6 LORD JUSTICE LEVESON: It depends a little bit what you mean 7 by "accurate", doesn't it, because you can put a whole 8 series of facts in the article but you have been rather 9 selective about the facts, which therefore drives to 10 a conclusion. Every single fact you have mentioned is 11 accurate, but it is not as balanced. 12 I wonder whether part of what you are saying is that 13 the balance which came from the type of journalism of 14 the 50s is now no longer prevalent, perhaps in part 15 because newspapers have to add something, and you can 16 get your facts by looking at the internet, watching the 17 24-hour news cycle, and therefore people at least are 18 perceived to require something rather more from their 19 newspaper. 20 A. I think that is probably right, although I am not sure 21 it is so new. I think probably in the 50s and 60s, 22 certainly the popular papers -- let's say the Mirror, 23 which then was selling four or five million copies and 24 saw itself as a campaigning paper, and by that it meant 25 that it was campaigning largely for issues which would</p> <p style="text-align: center;">Page 17</p>	<p>1 comment? 2 A. No, I wouldn't. I mean, I think it is necessary to do 3 so -- it is a good thing that fact and comment should be 4 separated, but I cannot see how an intervention of that 5 kind, certainly one which had the backing of statute, 6 would be anything other than oppressive of -- 7 LORD JUSTICE LEVESON: I don't think it would have the 8 backing of statute. We are just talking about whether 9 an ethical code or a statement of principle should 10 contain that as an aspiration. 11 A. Yes, as an aspiration, I think it would be fine, and 12 I think to distinguish between what is verifiably 13 factual and what is personal opinion would be -- is 14 a reasonable aspiration. 15 However, I'm aware that in most newspapers and 16 elsewhere in the media, that is in practice quite 17 difficult to maintain. It is quite difficult in 18 papers -- say, for example, the New York Times, which 19 does aspire, like many American newspapers, to separate 20 the two. One can often find the bias of the 21 newspaperman or of the commentator quite strongly there. 22 It is quite difficult to do, but I think as an 23 aspiration, it is a reasonable one. 24 LORD JUSTICE LEVESON: It goes back to the point, that it 25 depends what facts you put in.</p> <p style="text-align: center;">Page 19</p>
<p>1 be supported by the left -- and the Express and the Mail 2 would be the reverse, to some extent. 3 These, I think, would be highly opinionated papers 4 then and have remained so now. I think you have a class 5 of paper -- and the Times was it up until 70s, 80s -- 6 where, because it saw itself as a paper of the 7 establishment and was writing to and for and from the 8 establishment, then it had to be right, or it had to be 9 right as it possibly could. There are many memoirs and 10 stories about how both the sub-editors especially and 11 the reporters took great pains to make it right. 12 Now, if there is an equivalent to that, it is in the 13 business press, because the business press -- 14 Financial Times in this country and the business press 15 elsewhere -- has a pressure from its audience, who use 16 it as a tool as much or more than a source of 17 entertainment or passing the time, and therefore since 18 their decisions may well be based upon what it says, 19 then the pressure to get it right is much greater. 20 So the business press, I think, has remained the 21 repository of a fact-based discipline and others have 22 become much less so. 23 MR BARR: Would you support the continued existence in the 24 PCC code or any successor to the PCC code of 25 a requirement to separate and distinguish fact from</p> <p style="text-align: center;">Page 18</p>	<p>1 A. Yes, and that is true of all, since newspaper and all 2 reporting -- it is an obvious point to make -- is 3 perhaps -- what? -- 100th or 1,000th of the possible 4 facts of any event. Every event has a huge complex of 5 fact around it. What we do, almost, after a while, as 6 a reporter, unconsciously, is to aggressively fillet 7 from this complex of facts that which we believe are (a) 8 the most important, (b) our newspaper wants to have and 9 (c) what people will read. 10 So that filleting process, that compression, is the 11 essence of journalism, and must be so, otherwise it is 12 simply a transcript. So therefore facts are always 13 treated, to a certain extent, cavalierly. 14 LORD JUSTICE LEVESON: It may not be cavalierly, but 15 potentially selectively, and that selection itself 16 carries with it an opinion, as you just identified. 17 A. Always selectively, but one can at least, I think in 18 theory and I think also in practice, imagine reports and 19 read reports which are reports in good faith, I would 20 say. 21 LORD JUSTICE LEVESON: Yes. 22 A. And these reports in good faith are an attempt to say, 23 "Here are the salient facts and most important facts of 24 this speech, this event, this intervention, this 25 revelation", and a report in good faith is one which, as</p> <p style="text-align: center;">Page 20</p>

<p>1 far as is possible, does not select the facts for</p> <p>2 an opinionated reason but for one which wishes to give</p> <p>3 an accurate account as far as possible within the</p> <p>4 constraints of space of the event.</p> <p>5 MR BARR: Staying with paragraph 13 of your witness</p> <p>6 statement, you describe the creation and development of</p> <p>7 a third power, that of the news media, which</p> <p>8 increasingly has come to regard politicians and politics</p> <p>9 as a dirty game and expresses constant cynicism about</p> <p>10 it.</p> <p>11 Can I ask you to develop that idea, that argument</p> <p>12 for us briefly?</p> <p>13 A. I think what has happened -- and it was much of the</p> <p>14 burden of the book. What has happened, say, in the last</p> <p>15 20, 30 years -- it's happened in this country perhaps</p> <p>16 more than in others, in part of this very strong tabloid</p> <p>17 tradition here, stronger than in other democracies -- is</p> <p>18 to devalue the political process, to see elected Members</p> <p>19 of Parliament and other councils and, above all,</p> <p>20 ministers and indeed opposition politicians, as people</p> <p>21 who essentially are in it for themselves, and to</p> <p>22 approach their actions and their statements with the</p> <p>23 view -- or always with the question, in the reporter's</p> <p>24 mind: why is he or she saying that and what benefit will</p> <p>25 he or she get from it, either personal or political?</p> <p style="text-align: center;">Page 21</p>	<p>1 Looking at journalism cultures around the world, one</p> <p>2 is struck by how different they are, including in the</p> <p>3 democratic world, in western Europe or in North America.</p> <p>4 They have quite different ways of approaching things,</p> <p>5 and our way of approaching things, I think, has become</p> <p>6 overly cynical and reduces much of the complexity of</p> <p>7 everyday life, especially everyday politics, to a series</p> <p>8 of short term personal and political calculations.</p> <p>9 I think all that can be done in a free society is to</p> <p>10 argue against that, to propose different ways of</p> <p>11 approaching the coverage of events. I think in this</p> <p>12 country we are fortunate to have a public broadcaster</p> <p>13 which, by and large, reports, as I was saying earlier,</p> <p>14 in good faith and to an extent at least avoids the</p> <p>15 pitfalls of cynicism.</p> <p>16 Q. We may come back to some of the cultural issues you have</p> <p>17 raised there, but for the moment can I move on to the</p> <p>18 question of the power that politicians hold over the</p> <p>19 media.</p> <p>20 Would you agree that one of the ways in which</p> <p>21 politicians exercise power over the media is in the</p> <p>22 control of the supply of stories?</p> <p>23 A. Very much. Very important indeed, yes.</p> <p>24 Q. And are there any trends or patterns in the way that</p> <p>25 this power has been exercised in recent years that you</p> <p style="text-align: center;">Page 23</p>
<p>1 So the ostensible reason for, say, the speech or the</p> <p>2 proposal or the policy is increasingly subordinate to,</p> <p>3 if you like, the short term political reason. It is to</p> <p>4 court popularity of one kind or another. It is to</p> <p>5 advance the politician's career.</p> <p>6 Now, it seems to me that in any business like</p> <p>7 politics, as in other businesses, these considerations</p> <p>8 must be part of the assumptions and the calculations of</p> <p>9 the men and women in power. But to reduce it simply to,</p> <p>10 if you will, a cynical Occam's razor approach seems to</p> <p>11 me then to lose out on what is the most important part</p> <p>12 of it, and that is the nature of the intervention, the</p> <p>13 nature of the policy proposed and the merits or</p> <p>14 otherwise of that policy.</p> <p>15 Q. Can I take it that you regard that as a negative</p> <p>16 development in reporting?</p> <p>17 A. Yes.</p> <p>18 Q. And if so, what can be done about it?</p> <p>19 A. Well, what can be done about it, I think, is to perhaps</p> <p>20 subject it to debate, to put aspirational -- to make in</p> <p>21 the Press Council or a future press council -- to put</p> <p>22 these aspirational aims more clearly, and I think above</p> <p>23 all to try to work on, most effectively from within the</p> <p>24 profession of journalism itself, to work on the culture</p> <p>25 of journalism.</p> <p style="text-align: center;">Page 22</p>	<p>1 would draw to our attention?</p> <p>2 A. Yes. I think there is something in the argument which</p> <p>3 a number of people have made, including in this court,</p> <p>4 that there was a shift which New Labour brought in.</p> <p>5 I think that the leaders of New Labour, when it was in</p> <p>6 opposition -- Tony Blair, Gordon Brown, Peter Mandelson,</p> <p>7 later Alastair Campbell, who joined them as head of</p> <p>8 communications for the Prime Minister -- these men and</p> <p>9 many of their colleagues had a profound belief that two</p> <p>10 things had happened in the media: one, that John Major</p> <p>11 had been and was being destroyed by newspapers, or</p> <p>12 substantially destroyed by newspapers, and secondly,</p> <p>13 that before him, Neil Kinnock, the leader of the party</p> <p>14 before John Smith and leader of the party for much of</p> <p>15 the 80s, he also had been destroyed, most of all by the</p> <p>16 tabloid press and above all by the Sun.</p> <p>17 These were almost articles of faith and in talking</p> <p>18 to many of these people when I was writing the book, it</p> <p>19 came up again and again. It was, if you like, the</p> <p>20 foundation of the way in which they wished to project</p> <p>21 New Labour publicly, that they had to stop the</p> <p>22 newspapers -- above all, the newspapers, who, after all,</p> <p>23 were the opinion makers, rather than the broadcasters --</p> <p>24 to stop the newspapers ganging up on Labour. Once that</p> <p>25 happened, once the newspapers ganged up on a prime</p> <p style="text-align: center;">Page 24</p>

<p>1 minister or indeed a leader of the opposition, he or she 2 was finished. That, as I say, was an article of faith. 3 The way in which that was then prevented was to 4 constantly -- I think I used the phrase, or someone of 5 my interviewees used the phrase "feed the beast". Like 6 a bird bringing back worms for its chicks, there would 7 always be something to digest by the newspaper and 8 therefore keep them on your terms, rather than you on 9 theirs. 10 I think also that the New Labour aversion to any 11 kind of scandal, including private or sexual scandal, 12 and the way in which, once that came up, they very 13 quickly tried to solve it was an another indication of 14 this. 15 That then became the template. The belief that 16 newspapers had to be kept, as it were, on the back foot 17 by being constantly fed, the belief that 24-hour news, 18 which had become a feature of the 80s and 90s, meant 19 that they were under constant surveillance, 24-hour 20 surveillance, and therefore could never relax, meant 21 they had to armour plate their communication strategy 22 and be constantly pro-active. 23 I think, as has been said in this court, the 24 Prime Minister, when the Prime Minister was Tony Blair, 25 saw constantly newspaper editors, newspaper owners,</p> <p style="text-align: center;">Page 25</p>	<p>1 if they are a left wing government, from a left wing 2 press, or, if they are right wing government, from 3 a right wing press. They can expect always a press 4 hungry for scandal, who will find it sometimes in 5 relatively innocent speeches, declarations and actions, 6 and thus the politician must always be on his or her 7 guard and must be extremely attentive to keeping the 8 owners and the editors as happy as possible, so that the 9 activities of both Mr Blair and Mr Cameron are 10 explicable in that regard. 11 Q. Moving to the reverse side of the coin and the power 12 that the media has over politicians, which you touched 13 upon in your answer a moment ago, how powerful do you 14 assess the option of personal attack against 15 a politician by the media to be? 16 A. It can very powerful. It can be very powerful if it is 17 combined with some kind of scandal, whether in his or 18 her private life or perhaps in political life. 19 A revelation, say, of an abuse or a supposed abuse, 20 coupled then with a powerful polemic which says that 21 this person is not fit for his or her post, then becomes 22 extremely powerful. 23 I think more powerful -- this may be the subject of 24 another question, but more powerful, I think, is the 25 position the newspaper takes over time. The example</p> <p style="text-align: center;">Page 27</p>
<p>1 reporters, commentators, and that was the practice 2 followed by his successor as Prime Minister. It was 3 a combination of feeding and of armour plating. 4 Q. The 24-hour news cycle remains with us. Indeed, if 5 anything, it has intensified, particularly with use of 6 the Internet. Has the government response to that 7 environment changed in recent years, or not? 8 A. Yes, it has. I mean, as I say, because the 24-hour news 9 cycle means that there is no pause, as there used to be, 10 say, after 8 or 9 at night, when the first editions went 11 to bed, until some time later the next morning -- 12 it means, then, that the public relations exercise for 13 governments therefore must be (1) more numerous, must be 14 much more pro-active and must always have a rebuttal 15 ready and, if possible, another story ready. "Why are 16 you concentrating on this? Here is a nice bright shiny 17 story you have missed, and which you can have sometimes 18 all to yourself." 19 So politicians and people who are concerned with 20 public relations within politics would say -- and 21 sometimes openly but always when talking off the 22 record -- would say that is exactly what they are there 23 to do. They are there to defend their masters or 24 themselves from a press that has become, as they see it, 25 ruthless, that they cannot expect any kind of good ride,</p> <p style="text-align: center;">Page 26</p>	<p>1 that comes to mind is that the Sun, which had been, when 2 Rupert Murdoch bought it, a paper of the left, with its 3 origins, I think, in the Daily Herald, which had been 4 a left wing newspaper, in the 70s and 80s, created, if 5 you like, a working class conservatism. It gave 6 permission to people who had been born working class and 7 who may remain working class to be aspirational, to buy 8 their council houses and to be -- to consume more than 9 they did he have before, and indeed therefore to vote 10 for a party which expressed these aspirations, which had 11 been seen much more a party of the middle class. That 12 the Sun should both create some of that trend and run 13 with a trend which was running in society anyway was 14 much more power, I think, than any individual attack, 15 any individual attack or revelation. It was a kind of 16 constant underpinning of the journalism of all kinds, in 17 the Sun above all, but also in some of the other 18 tabloids, and which, as I say, gave permission to large 19 numbers of people to think differently and to therefore 20 choose politically differently than they or their 21 parents and grandparents had done. 22 Q. If that sustained position is particularly powerful, how 23 would you rate the power of electoral support of 24 a newspaper at a particular election? 25 A. I think studies have shown it is less important, that</p> <p style="text-align: center;">Page 28</p>

<p>1 for a paper to come out for X or Y party is less 2 important. I think politicians -- I think there is 3 something in the argument that politicians see it as 4 more important than it is and that, for example, when 5 the Sun very publicly and apparently damagingly changed 6 from support for New Labour to support for Conservatives 7 before the last election, that was assumed by many 8 politicians, both right and left, to be very important. 9 It probably was rather less important than they thought.</p> <p>10 Q. You touch, at the bottom of page 7 of your witness 11 statement, on the issue of transparency in dealings 12 between politicians and the media. Can I ask you to 13 develop your thoughts and to tell us, first of all, at 14 what level of contact do you think it is necessary for 15 a record to be put into the public domain?</p> <p>16 A. I think certainly formal interview. I think it would be 17 reasonable for it to be in the public domain that the 18 Prime Minister or a Cabinet Minister had met an owner, 19 an editor, commentator, reporter, for that matter, 20 although the reporter would very often reflect that 21 meeting had taken place.</p> <p>22 I think that one enters into a much more difficult 23 area where one talks about more casual meetings, and the 24 kind of chat, if you will, sometimes social or even 25 friendly -- friendly acquaintance kind of banter and</p> <p style="text-align: center;">Page 29</p>	<p>1 newspaper executives should be?</p> <p>2 A. Yes, I think so. I think a record should be in the 3 public domain that the meeting took place.</p> <p>4 Q. Which takes me to the next question, as to the level of 5 detail. Should it be simply the fact of the meeting, 6 should it go further and identify at least the subject 7 matter of the conversation, or should it go further 8 still?</p> <p>9 A. My bias is towards the first, that is that it took 10 place. I think that ministers, prime ministers and 11 indeed owners, editors and so on have a right to talk in 12 private if they wish, but that at least it is logged 13 that they were seen and then one gathers, as one has 14 gathered, in meetings between the Prime Minister and 15 executives of News International -- the very fact of the 16 regularity of the meetings, the frequency, is itself 17 a valuable fact.</p> <p>18 Q. At page 8 of your witness statement, you return to the 19 question of the culture of journalism itself, which you 20 identify as a primary issue. In your book, you place 21 considerable weight on the interview with Andrew 22 Gilligan which led ultimately to the Hutton Inquiry. 23 You say this is particularly illuminating as to modern 24 media culture.</p> <p>25 Can you tell us very briefly what your concern was?</p> <p style="text-align: center;">Page 31</p>
<p>1 chat that goes on constantly between contacts and 2 journalists. In my experience, both working here and 3 abroad, one gathers at least as much information from -- 4 very often accidentally, by chance, something comes up 5 which you had not gathered before -- from these 6 off-the-record friendly, informal occasions as you do 7 from what, after all, is, on the part of the 8 interviewee, something which has been well prepared.</p> <p>9 So I think to regulate that would be adverse to both 10 the freedom of the press, press freedom, and to the 11 public interest, because it is from that huge 12 undergrowth of contacts between journalists and people 13 of all kinds -- in business, in politics, in 14 institutions -- that one gets the first intimation of 15 important stories, and indeed very often how they are 16 developing, how important are they, what is being said 17 in this or that circle, what is coming up, who is up, 18 who is down.</p> <p>19 These things are very rarely the subject of formal 20 interviews but they do exist in this substratum, into 21 which journalists must link if they are to keep abreast 22 of the areas which they cover.</p> <p>23 Q. If routine encounters between a journalist and 24 a politician are not to be recorded, would you agree 25 that meetings between senior politicians and senior</p> <p style="text-align: center;">Page 30</p>	<p>1 A. When I was beginning to write the book, it seemed to me 2 an encapsulation of a major theme of it; that is that 3 between the media and politics had developed a daily, 4 indeed hourly struggle, and the struggle was over the 5 minds of those whom we journalists call the audience or 6 the viewers or the readers and whom politicians call the 7 electorate, the citizens. In a way, we are fighting for 8 the same thing. We are fighting for the allegiance of 9 their opinion. We are fighting for their allegiance.</p> <p>10 That struggle, which I think is an increasing 11 feature of the media from the 70s onwards, and became 12 much more overt, seemed to me to have a kind of epiphany 13 in the Gilligan affair, because although it became quite 14 clear quite quickly that the BBC did not -- at the very 15 least did not have the substance with which to back 16 an allegation which essentially was that the Prime 17 Minister knowingly lied to the country in the first 18 report of that, just after 6 in the morning, it 19 continued to defend that, although it no longer 20 continued to put it out, and defended it to the point of 21 pitting itself against the government.</p> <p>22 In his memoirs, Blair writes about the surprise he 23 had that the BBC could not simply issue an apology which 24 for something which, after all, could have been simply 25 a footnote, but instead defended, right up to the level</p> <p style="text-align: center;">Page 32</p>

1 of the chairman and the director general, the report and
 2 rebutted any attempt by the government to have it
 3 corrected, and did so on the grounds that for it to do
 4 so would be to cave in to political pressure and as
 5 a free medium, part of the free media, it could not do
 6 so without losing part of its freedom.
 7 That seemed to me to be a very good example of the
 8 struggle which I was trying to illuminate.
 9 Q. You say that the code of ethics needs to be internalised
 10 by journalists and that a culture of more ethical
 11 journalism should not and probably cannot be imposed.
 12 Let's look at some of the mechanisms by which a code
 13 of ethics might be internalised, starting with the code
 14 itself. You have already told us a little bit about how
 15 you think codes might be improved; is there anything
 16 further you would like to add about how to move ethics
 17 forwards through a code?
 18 A. It is clear that the PCC code, which is by and large
 19 a good one, one which puts, in fairly unambiguous terms
 20 the underpinning of a free -- the free media in
 21 a democratic society and spells out the duties and
 22 responsibility as well as the freedoms -- it is clear
 23 that that really had little effect in the day-to-day
 24 life of many newspapers, and perhaps of very little
 25 relevance to any newspapers, since many newspapers

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1 already had, either explicitly or implicitly, a code of
 2 behaviour in their reporting and in their editing,
 3 which, in a sense, didn't need to have the prick -- the
 4 spur given to them by the PCC code.
 5 How to internalise a code of ethics seems to me to
 6 be a long-term thing. It depends very much on the way
 7 in which journalists, especially reporters -- all
 8 journalists see themselves, and what I have argued is
 9 that as long as they see themselves as, to a large
 10 extent, the servants of a news desk, an editor,
 11 a proprietor, at a distance at least, and that anything
 12 their boss or bosses tells them to do, any kind of story
 13 they tell them to get, any kind of methods they wink at
 14 for getting that, they should fulfil. The more that is
 15 the way in which journalists approach their work, the
 16 less ethics will matter and will be observed.
 17 Other -- we always say -- partly a defence, as well
 18 as self-deprecation, we say journalists say, "We are not
 19 a profession; we are a trade. We are not like you
 20 lawyers, doctors, accountants. We are a trade." It is
 21 partly self-defence, and its self-defence because we
 22 implicitly assume that we therefore don't have the
 23 inhibitions which are upon you. We don't have the
 24 professional codes. We don't have organisations which
 25 can strike us off from being a journalist in the way

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1 that, say, a doctor will have. Thus our ethical
 2 observance doesn't have to be anything like as near the
 3 front of our mind as the professions do.
 4 Whether we are a profession or a trade, it seems to
 5 me, doesn't matter. What we do need, I think, is some
 6 sense that there are limits to what we will do for those
 7 who hire us, and that these limits depend upon doing
 8 journalism, writing stories which (a) are, as far as we
 9 can tell, observably true, and (b) do not, grievously,
 10 egregiously and for no real public interest purpose,
 11 impinge on people's privacy.
 12 If we internalise and have that as part of our
 13 ethic, then we can at least refuse -- maybe at the cost
 14 of our job or promotion, but we can, with some dignity,
 15 refuse to do the bidding of people who wish us to do
 16 things which are and would be regarded as being
 17 unethical, but that is what was in my mind.
 18 Q. You identify a number of institutions concerned with the
 19 news media: the Reuters Institute, which you have told
 20 us a little bit about already, the Media Standards Trust
 21 and Polis at the LSE. What role do you foresee for such
 22 institutes in the maintenance and improvement of ethical
 23 standards in the media?
 24 A. I think they are important, but so far, they have been
 25 important in a minor key. Most journalists are

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1 contemptuous of academics. To say that someone is
 2 academic is pejorative, rather than a compliment. They
 3 are contemptuous of academic media studies or journalism
 4 studies, although increasingly now, journalists -- not
 5 true of my generation, but of younger generations --
 6 increasingly, journalists come out of journalism
 7 schools. But still that contempt remains, that
 8 academics, scholars, people who draw up codes of ethics
 9 and so on, essentially are not in the real world, that
 10 they are abstract, they don't know what happens, they
 11 don't know the difficulties of getting stories out of
 12 reluctant politicians or others. They simply -- and
 13 indeed also don't know anything at all about the market
 14 and what people wish to read.
 15 So it is very difficult.
 16 LORD JUSTICE LEVESON: Some people have said that about the
 17 Inquiry too.
 18 A. Indeed. Well, you have so far borne it.
 19 So far, I think -- sorry, the difficulty then is to
 20 get the debate and the research and the proposals of
 21 what are academic or quasi-academic institutions -- the
 22 Reuters Institute is part of Oxford University, POLIS is
 23 part of LSE, the Media Standards Trust is not part of
 24 a university but brings out material or publishes
 25 material which is rather similar to much of what POLIS

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1 and the Reuters Institute does.

2 The problem is getting that into, if you like, the

3 journalistic discourse. There is no, if you like,

4 general meeting place for journalists who then discuss

5 these issues. There are the usual suspects, who will

6 come to academic conferences or seminars and give their

7 views, but by and large they don't.

8 Reuters Institute have tried extremely hard to get

9 editors of tabloids to speak, and they simply will not

10 come. Sometimes when they do respond, which is rare,

11 they will say that there is no point in having

12 a dialogue because it would be a dialogue of the death.

13 So what does happen in other cultures -- again,

14 especially in the United States, where there is, at

15 least to some extent, a mingling of the academy or

16 journalism studies with the profession -- hardly happens

17 here at all, and I think that is a shame, because

18 although some journalism and media studies, in my

19 experience, are almost impenetrable because they use

20 a particular kind of academic jargon, much of what is

21 published is of great use and interest and elevates the

22 debate as well as the profession.

23 So it is difficult to get these things across.

24 Q. You also raise the idea of a journalism society. Whilst

25 one can see for the person motivated to join and to

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1 participate that might have great benefit, would you

2 accept there is always going to be an Achilles' heel to

3 something like a journalism society in that the less

4 principled journalist simply won't join?

5 A. Yes, I think that is right. I think that is not

6 a reason for not doing it, because that would be true in

7 many walks of life, but I think it is worthwhile now --

8 and it is worthwhile now especially for one reason.

9 My profession -- my part of the profession is declining.

10 There are fewer and fewer newspapermen and women around,

11 and that will continue to be the case. But there are

12 vast millions and millions of people who, in one way or

13 another, use the report to report, to publicise, to

14 comment. Some of them might well claim to be

15 journalists and some of them, I think, are at least

16 doing a journalistic job and for them I think

17 a journalism society, a kind of voluntary institute,

18 probably with a virtual existence more than a real one,

19 where issues of what do you report", when do you report,

20 how much privacy should you observe, to what purpose,

21 what is the public interest, can be debated, I think,

22 again, it would raise the game and would give this new

23 journalism, which is still developing and we barely

24 understand and many of us are hostile to it because it

25 impinges upon our traditional role as gate keepers -- it

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1 would help, I think, develop citizens' journalism

2 a great deal. So I think it is a good idea. How one

3 gets it off the ground, how one pays for it is another

4 matter.

5 Q. At the bottom of page 9 of your witness statement, you

6 discuss self-policing by the media and you point to the

7 perhaps seminal example of the Guardian and its pursue

8 of the hacking story. But would I be right to

9 understand that you think on the whole the media has not

10 done a particularly good job of policing itself?

11 A. No, it hasn't. I think that is a correct assumption.

12 I think another watchword of Fleet Street was that dog

13 does not eat dog and that meant that you didn't then

14 reveal the egregious errors or indeed the egregious

15 tactics of other papers, even if they were your

16 competitor.

17 Quite often, there would be an agreement between

18 newspaper editors as, I think, again in this court, it

19 was said that there was an agreement -- I have no

20 knowledge if this was the case -- between the Daily

21 Express and Daily Mail that they would stop criticising

22 each other. These kind of either explicit or implicit

23 assumptions that you don't go for other newspapers, you

24 don't criticise other people's reports, were -- was the

25 rule.

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1 The Guardian, to its great honour, broke that rule

2 and was much criticised for doing so. In a minor key,

3 when I wrote the book I was much criticised for doing

4 so, for breaking the code which says you do not, in

5 writing about journalism, do other than make some jocular

6 self-deprecating remarks, and that is about the limit.

7 I think now that the Guardian has done that, now

8 that it is clear -- much clearer than it was before --

9 that journalism cannot merely be defended by saying --

10 by reference to the freedom of the press, and therefore

11 anything we do is by definition correct -- since that,

12 I think, has been fairly clearly, including in this

13 room, has been pretty clearly exploded, I think now that

14 both in newspapers or in television, still the dominant

15 medium, and much, much more in the new internet sites,

16 websites and so on, the watchdog of the watchdog

17 function will be developed much more.

18 Q. Is there anything that can be done particularly to

19 encourage that?

20 A. I think one issue is to make it -- this sounds minor,

21 but actually it is quite important. A number of small

22 NGOs have begun or have tried to begin correction

23 websites. That is, they will take -- the one I am

24 thinking of, which I had some hand in helping start,

25 called Full Fact, which is now operating, takes speeches

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<p>1 by politicians or by other public figures and reports on 2 television and in newspapers and so on which it would 3 deem to be possibly contentious and examine it for 4 factual accuracy. 5 Now, clearly, every day a vast number of facts or 6 apparent facts are put into the public arena, so it must 7 be highly selective, especially since these things work 8 on a shoe string. 9 Channel 4 has something similar to it as well. But 10 the development of websites -- and they will largely be 11 websites -- which at least are there as a record to say, 12 "When X said Y, he was wrong, he got most of his facts 13 wrong. When the Daily Beast reported this, it was 14 wrong, and it was wrong for these reasons, and we have 15 checked it out and we have found it wrong" -- that is 16 extremely valuable and I think that should continue. 17 The problem is that the Charity Commission is very 18 reluctant to give charitable status to such an NGO 19 because it sees it as being political and of course it 20 shies away, rightly, from that. But I think that 21 a looser approach to that kind of organisation, a more 22 understanding approach that this in the public interest 23 and not simply a political tool would help enormously 24 and would allow these organisations to be more efficient 25 because it would allow them to raise more money.</p> <p style="text-align: center;">Page 41</p>	<p>1 Q. Do you have any ideas as to the best way to fund 2 a future regulator? 3 A. That is very difficult. PressBoF, which funds the PCC, 4 is declining, not just because Richard Desmond Express 5 Group newspapers withdrew from it and therefore withdrew 6 their contribution to it but because every newspaper 7 group now faces an extremely uncertain financial future 8 and therefore will wish to cut back where it can. And 9 although the PCC is not huge, it is, for some newspaper 10 groups, several hundred thousand pounds, and I think 11 they would try to limit that. So getting it from the 12 industry becomes increasingly difficult. 13 Then there is the state, and that, then, of course, 14 raises the spectre of state interference. My own view 15 is that in this country at least, the example of the BBC 16 as other institutions, including the law itself, being 17 funded by the state does not mean that independence is 18 therefore fatally compromised. 19 But the third, I think -- the third way could be for 20 some voluntary or institutional contribution. That is, 21 that the institution raises its funds from those who -- 22 wealthy individuals, institutions, charitable 23 institutions, funding institutions, who have a strong 24 interest in a free and independent media. 25 That, I think, would be better. That is not to say</p> <p style="text-align: center;">Page 43</p>
<p>1 Q. We have spoken mainly so far about matters of culture 2 and changing behaviour from within. Can we move now to 3 the question of regulation and in particular to future 4 regulation. If we start with independence. Would you 5 agree that any future regulator needs to be independent, 6 particularly of government but also of the press? 7 A. Yes, certainly of government. I think a regulator -- it 8 is reasonable to have representatives of the press. It 9 is not reasonable to have the press dominate, in the way 10 they have, the Press Complaints Commission. 11 Q. In terms of the composition of the regulator, do you 12 have any view as to whether serving editors should sit 13 or whether it would be better for retired editors, 14 without the commercial interest, to be involved? 15 A. I think probably the latter. I think serving editors 16 inevitably, with the best will that they can muster, 17 must pursue, since these are extremely busy men and 18 women and must always look out for the interests of 19 their newspaper, that their decisions would be very 20 deeply affected by short-run advantage and must be so. 21 So it would be better, I think, to have former editors. 22 Q. The question of an appointment system for whoever is to 23 sit on a future regulator, would you agree that it needs 24 to be an independent body? 25 A. Yes, I would.</p> <p style="text-align: center;">Page 42</p>	<p>1 that these wealthy individuals or institutions have no 2 agenda; very often, they will have a very powerful one. 3 But if a number of them came in and they came in on the 4 specific understanding that they gave money to a goal 5 but not gave money in order to have their opinion 6 served, then that, I think, would be the best outcome. 7 Q. In terms of -- 8 LORD JUSTICE LEVESON: Can you give an example of some such 9 institution or body? 10 A. There is in -- I keep instancing the United States but 11 it is the best example of it. The Committee for the 12 Freedom of Journalism, I think -- the main body which, 13 in a way, is rather like and is the inspiration for the 14 idea of a journalism society is funded in this way by 15 the Pew Trust. Pew is one of these big American 16 institutes which were funded, often decades ago, by 17 a wealthy individual and has a large foundation and 18 a large fund. Sorry, I beg your pardon, I have 19 remembered it: the Committee for Concerned Journalists. 20 It is by far the most important body within the 21 United States, mainly in the newspaper section, for 22 dealing with issues of journalism standards, issuing 23 a yearly and very influential account of how journalism 24 has gone in the US -- say, for example, how many foreign 25 correspondents there are, how many have been cut, how</p> <p style="text-align: center;">Page 44</p>

1 many bureaus remain and so forth.
 2 That is funded not by the industry, not by the
 3 state -- the state funds very little in the media in the
 4 United States -- but funded by a very well funded
 5 institute, the Pew Foundation.
 6 MR BARR: In terms of what the future regulator might do, do
 7 you agree that one of its functions must be to
 8 adjudicate upon standards?
 9 **A. Yes, I think that is a reasonable duty for it to have.**
 10 Q. Do you see merit in it having power proactively to
 11 investigate?
 12 **A. Yes. I think that if and when newspaper groups or media**
 13 **groups bought into this, they should buy into a system**
 14 **where their protestations and their signing up to**
 15 **a code -- which all members, of course, of the PCC do**
 16 **sign up to -- should be examined and should be**
 17 **relatively transparent in the way that a newspaper**
 18 **editorial will routinely say that any institute should**
 19 **be at times investigated to make sure it is living up to**
 20 **its own claims.**
 21 Q. Do you have a position as to whether or not it would be
 22 a good idea to allow third parties to raise complaints
 23 about media coverage or should complaints be restricted
 24 to those personally affected. I am thinking here about
 25 pressure groups and so on.
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1 **A. I think it is reasonable for third parties. I think the**
 2 **restriction of the moment of the PCC, which is that the**
 3 **complaints will only be accepted if they are actually by**
 4 **the person who has suffered the real or imagined injury,**
 5 **is too restrictive.**
 6 There is a problem, of course, that that may open
 7 the doors to all kinds of -- to simply an unmanageable
 8 flood of complaints, and therefore I think one would
 9 have to be discriminating. But I think that at the
 10 moment, restricting it to simply the object of the real
 11 or supposed harm is too restrictive.
 12 LORD JUSTICE LEVESON: What you have to be able to do is
 13 tell the difference between what is itself an attempt to
 14 legitimately influence the debate --
 15 **A. Yes.**
 16 LORD JUSTICE LEVESON: -- from what is a legitimate
 17 complaint about what has actually been done.
 18 **A. Yes.**
 19 LORD JUSTICE LEVESON: That is the difference, isn't it?
 20 **A. Indeed, and discrimination could -- there must be some**
 21 **mechanism to discriminate between the two.**
 22 MR BARR: Do you think it would be a useful role for
 23 a future regulator to have a dispute resolutions
 24 function to provide a quick, cheap and effective way of
 25 resolving privacy complaints and defamation issues
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1 without recourse to the court?
 2 **A. The way you put the question almost demands a yes, but**
 3 **I think that is right.**
 4 Q. I accept that and so I am going to ask the follow-up,
 5 which is: do you think that is something which can
 6 practically and feasibly be put into place?
 7 **A. I think it can. Again, much will depend on the details**
 8 **and the practice and the devil is in the details, but I**
 9 **think it can be, yes. It can at least be attempted.**
 10 Q. As to teeth, what sanctions do you think it would be
 11 appropriate for a regulator to deploy in appropriate
 12 cases?
 13 **A. I think that one sanction is to make sure that the**
 14 **offending and -- the offence would have to be very**
 15 **clearly established, but once it had been clearly**
 16 **established the offence on the part of the publication**
 17 **or the broadcast should itself receive as much publicity**
 18 **as possible, that the regulator, the council, would have**
 19 **the power and should have the influence to put it in the**
 20 **public domain and expect it to get some salience in that**
 21 **public debate, especially on television.**
 22 In other words, what one would seek to do is to
 23 raise the game. At the moment, of course, PCC -- the
 24 upholding of complaints to the PCC are published. They
 25 are published to the offending member. They can be
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1 published anywhere in the newspaper, but they are
 2 published and usually are published -- in fact, I think
 3 always published in full, but they receive little
 4 attention.
 5 I think what one would seek to do is to raise the
 6 game, and that is to give -- and this would be partly by
 7 example, partly by the leadership of the council,
 8 whatever it might be -- to say, "This is very important.
 9 An important breach of public trust has been committed
 10 by X newspaper and we wish to take some time to put it
 11 right." The function of ombudsmen in newspapers has
 12 been -- and in this country, there are very few of
 13 these, the Guardian is one -- has been to draw attention
 14 in a much visited part of the newspaper to something
 15 which has gone badly wrong within the newspaper.
 16 Again, the better example is in the United States,
 17 where both the Washington post and New York Times had
 18 ombudsmen who were exceptionally given huge space -- in
 19 one case, the ombudsman reported, at many pages' length,
 20 a piece in the magazine which, in his view, had been
 21 comprehensively been misreported.
 22 It is that kind of making a fuss about it, making
 23 sure that the audience understands that this is
 24 a large -- this is not just a routine matter; it is
 25 a large and important matter because a large number of
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1 **people have been misinformed and that is a bad thing.**
 2 **That, I think, is the main sanction that should be**
 3 **developed.**
 4 Q. What about a power to fine?
 5 **A. If a voluntary organisation then gives the institution**
 6 **of which it is part the power to fine, yes. And I think**
 7 **for serious lapses then that would be -- the fines would**
 8 **have to be fairly substantial in order to actually**
 9 **deter, but yes, if it was agreed by the membership that**
 10 **should be the case, then yes.**
 11 Q. The qualification you introduced to that answer takes me
 12 to the next point, which is: what mechanism is required
 13 in order to ensure that all those who ought to be
 14 subject to a future regulatory regime are in fact
 15 subject to it? When we have, at the moment,
 16 Mr Desmond's newspapers outside the PCC and we have
 17 Private Eye outside the PCC for rather different
 18 reasons, is voluntary mechanism really feasible?
 19 **A. It comes on to -- I mean, this touches on something we**
 20 **haven't talked about much but which is increasingly**
 21 **important, and that is the huge amount of journalism and**
 22 **revelation which is simply not in the mainstream media,**
 23 **ie the net and the increasing weakness of the mainstream**
 24 **media may render some of these discussions not**
 25 **irrelevant but increasingly difficult to make any -- to**

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1 elaborate mechanisms.
 2 **But I think there are two methods if one is dealing**
 3 **with newspapers as they are now. One is to develop --**
 4 **if one can develop carrots, to develop carrots, and one**
 5 **of these is one which the Irish press council has come**
 6 **up with, which is that members who are in good standing**
 7 **and shown to be in good standing will enjoy an**
 8 **assumption, I think is right -- if a libel case is taken**
 9 **against them, the judge will take the good standing into**
 10 **account and may reduce the damages.**
 11 **So that may be one reason why Mr Desmond's**
 12 **newspapers in Ireland are members of the Irish Press**
 13 **Council but not members of the British PCC. The other,**
 14 **I suppose, is --**
 15 LORD JUSTICE LEVESON: Sorry -- no, you carry on and I will
 16 come back to it --
 17 **A. I was only going to say that the other is statute, and**
 18 **therefore that membership is -- and the Media Standards**
 19 **Trust, as I understand their proposal, which only**
 20 **recently came out -- the Media Standards Trust has**
 21 **argued that under statute, all news media organisations,**
 22 **corporations certainly -- not individuals on the web but**
 23 **news corporations of some kind or another should be**
 24 **members.**
 25 LORD JUSTICE LEVESON: Let me test the Irish idea. We might

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1 be going to this further. Is there not something which
 2 is not entirely satisfactory about a system which
 3 results in differential compensation for the victim
 4 depending upon who victimised the victim?
 5 **A. I agree entirely. I mean, I made the point myself.**
 6 **I think it doesn't really matter to the victim that the**
 7 **offending newspaper has been, in the estimation of his**
 8 **peers and the council, a good member, because his damage**
 9 **remains the same. It doesn't affect his damage.**
 10 **Therefore -- I talked to the Irish ombudsman and he**
 11 **himself sees this as a weakness. As I understand it,**
 12 **the issue has not yet been tested in court, but he would**
 13 **expect exactly that objection to come up.**
 14 MR BARR: Further on the question of statute, put out of
 15 your mind, please, any possibility of statutory
 16 regulation of content, which has very obvious
 17 difficulties, and consider a statutory underpinning to
 18 a regulator designed to ensure inclusion and to confer
 19 powers; what is your view on that?
 20 **A. I think, perhaps because I have been in newspapers most**
 21 **of my professional life, I still have kind of an**
 22 **aversion to it. To a degree, I would not wish to**
 23 **justify it rationally, but I think I would -- nearly all**
 24 **newspaper people, no matter what part of the jungle they**
 25 **have made their living in or make their living in, have**

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1 **a kind of built-in aversion and a kind of, if you will,**
 2 **preference for a part of society which remains -- which**
 3 **retains the right to be irresponsible.**
 4 LORD JUSTICE LEVESON: So it is emotional, rather than
 5 intellectual?
 6 **A. I fear it is. I will go on to be intellectual in**
 7 **a second, but just to deal with the emotion -- because**
 8 **emotions are powerful, as you will have seen in this**
 9 **court -- the way the press here developed was -- you can**
 10 **see it in novels, in Victorian novels like "The Warden"**
 11 **or "Pendennis". You can see how it developed as a kind**
 12 **of subliterate genre, and that is probably true in other**
 13 **countries as well. Certainly it was true in France.**
 14 **Therefore it grew as something which was organically**
 15 **Bohemian, anti-authoritarian, possibly overly**
 16 **emotional -- indeed, certainly overly emotional -- but**
 17 **nevertheless free.**
 18 **That, I think, remains an attachment by newspaper**
 19 **people to that kind of system and therefore there is**
 20 **a certain recoil from the kind of much more formal and**
 21 **careful calculations that have to be made and are made**
 22 **by people in the professions.**
 23 **Intellectually, I think, as I said before, statute**
 24 **in this country, underpinning statutory arrangement, has**
 25 **not, in the case of the BBC, in dealing only with the**

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1 media, has not meant that it is -- that it has become
 2 a government voice -- very far from it -- or, I think,
 3 decreased its appetite to do difficult reporting,
 4 investigative reporting, reporting which has embarrassed
 5 both the government and institutions like the police and
 6 so forth.
 7 **So I have no particular fears of a statutory**
 8 **underpinning, but I testify that there is this strong**
 9 **underpinning in the newspaper industry of a dislike of**
 10 **being marshalled into the same kind of more, if you**
 11 **will, responsible corrals which -- into which other**
 12 **professions are accustomed to work.**
 13 MR BARR: Thank you. Those are all my questions.
 14 LORD JUSTICE LEVESON: Thank you very much, Mr Lloyd. I can
 15 assure you that I have absolutely understood that last
 16 point.
 17 Thank you very much. We will take a break.
 18 (11.28 am)
 19 (A short break)
 20 (11.35 am)
 21 LORD JUSTICE LEVESON: Yes, Mr Jay?
 22 MR JAY: The next witness is Mr Tim Colbourne, please.
 23 LORD JUSTICE LEVESON: Thank you very much.
 24 MR TIMOTHY COLBOURNE (affirmed)
 25 Questions by MR JAY

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1 MR JAY: Thank you, Mr Colbourne. You have given us your
 2 full name. May I invite you, please, to turn up your
 3 witness statement, which will be in the file in front of
 4 you. It is dated 17 May. It has three exhibits. Are
 5 you able to confirm this as your evidence to the
 6 inquiry?
 7 **A. I am.**
 8 Q. This is evidence that you volunteered, rather than
 9 provided pursuant to a statutory notice; is that
 10 correct?
 11 **A. That's correct.**
 12 Q. In terms of who you are, you have been a special adviser
 13 working to the Deputy Prime Minister since August 2010
 14 and you are based in the policy and implementation unit
 15 at Number 10 Downing Street?
 16 **A. That's right, correct.**
 17 Q. And so if we are looking at the period
 18 particularly December 2010, what, in general terms, were
 19 your responsibilities?
 20 **A. I was responsible for four government departments: the**
 21 **Ministry of Defence, the Department for Culture, Media**
 22 **and Sports, the Department for Work and Pensions and the**
 23 **Cabinet Office. I was one of five special advisers in**
 24 **the Number 10 policy unit and I provided advice largely**
 25 **to the deputy Prime Minister on those portfolios. Very**

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1 occasionally, in the early months of the job, I had
 2 occasion to provide advice to the Prime Minister,
 3 although around the end of 2010, that system changed,
 4 the policy unit expanded and the lines of reporting were
 5 clarified and my advice from that point onwards was
 6 solely to the Deputy Prime Minister.
 7 Q. On 17 November 2010 -- this is page 13730, under tab 2
 8 of the file -- you received an email from Mr Frederick
 9 Michel; is that correct?
 10 **A. That's correct.**
 11 Q. Had you any contact with him before you received this
 12 email?
 13 **A. No, this came out of the blue, as it were.**
 14 Q. It says, amongst other things:
 15 "It would be good to discuss the current agenda
 16 around the creative industry ..."
 17 In a nutshell, what was that agenda?
 18 **A. Two things, largely. There was a piece of work being**
 19 **conducted by Professor Ian Hargreaves into intellectual**
 20 **property and copyright, which I had some familiarity**
 21 **with. I had a number of conversations around that time**
 22 **with various parts of the media and broadcasting**
 23 **industries about that work.**
 24 **Secondly, the Digital Economy Act, which was a piece**
 25 **of legislation passed at the end of the last**

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1 **Labour Government's time in office and for which various**
 2 **pieces of secondary legislation remained to be enacted**
 3 **and there are ongoing discussions within government,**
 4 **with industry and others about legislation. So those**
 5 **were the two topics of interest to me.**
 6 Q. We see no reference to the BskyB bid in this email. Had
 7 the BskyB bid been on the agenda, would you have agreed
 8 to see Mr Michel?
 9 **A. No, I wouldn't.**
 10 Q. We know that a meeting took place on 2 December 2010.
 11 There are two pieces of evidence which relate to it.
 12 First of all, please, your note, which is under tab 3,
 13 please, of the bundle. Page 13732. First of all, can
 14 you tell us, where did the meeting take place?
 15 **A. The meeting took place in one of the rooms at Number 10,**
 16 **which is known as the study. It is one of the state**
 17 **rooms on the first floor.**
 18 Q. The handwritten part which we see here, this obviously
 19 is your handwriting. May I ask you, please, when did
 20 you complete these notes?
 21 **A. They were completed during the meeting, so I wouldn't**
 22 **have made any further changes to them afterwards.**
 23 Q. Thank you. The note itself is self-explanatory. There
 24 is reference to the creative industry agenda but then it
 25 moved off to BskyB. Were you surprised when Mr Michel

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<p>1 started to debate those matters?</p> <p>2 A. I wasn't entirely surprised that he would take the</p> <p>3 opportunity, given that we were sitting in a room</p> <p>4 together, to try to pick my brains. If I recall</p> <p>5 correctly, he asked if I was aware of what was going on</p> <p>6 with the bids. I explained that I had no part in it and</p> <p>7 I knew absolutely nothing about the progress of the bid.</p> <p>8 He then asked whether I was aware of the stages in the</p> <p>9 process that were expected to come over the following</p> <p>10 months.</p> <p>11 As I was pretty sketchy about where those milestones</p> <p>12 lay and I decided it would be useful to understand the</p> <p>13 contours of the process, if not the content of the</p> <p>14 process, we then had a discussion around when those</p> <p>15 milestones were to be expected.</p> <p>16 Q. There is reference to Ofcom's role, looking at plurality</p> <p>17 not at competition. That is correct:</p> <p>18 "Brussels looks at competition. Ofcom report to</p> <p>19 News Corp with questions. Ofcom report to Vince. Vince</p> <p>20 decides whether to go to the Competition Commission."</p> <p>21 Can I ask you, please, to compare your notes with</p> <p>22 the email in KLM18. This is under your tab 10. It is</p> <p>23 in the PROP file at page 01677. Do you have that to</p> <p>24 hand?</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 57</p>	<p>1 implication here that I was offering strategic advice to</p> <p>2 News Corp for the furtherance of their bid, which was,</p> <p>3 at that time, in progress, and that I was offering that</p> <p>4 advice with the implication that Vince Cable would be</p> <p>5 receptive if they took one stance or another in relation</p> <p>6 to the Labour Party.</p> <p>7 That I completely reject. I would not have offered</p> <p>8 advice in those terms. I have to say, I have no</p> <p>9 particular insight into the thoughts and workings of the</p> <p>10 Labour Party on this and most other matters, but in this</p> <p>11 case, I suspect that a passing reference has been</p> <p>12 over-interpreted and exaggerated in Mr Michel's record</p> <p>13 and it doesn't reflect the conversation which took</p> <p>14 place.</p> <p>15 The notes which I took of the meeting, the</p> <p>16 contemporaneous notes, don't make reference to this</p> <p>17 point, and as I say, I have no specific recollection of</p> <p>18 it being discussed.</p> <p>19 Q. Might Mr Michel have said something along the lines that</p> <p>20 it was important for News Corp to get Labour on board?</p> <p>21 A. Quite possibly, and if that was said, I imagine I would</p> <p>22 have politely acknowledged it.</p> <p>23 Q. The fifth point:</p> <p>24 "He [that is you] will insist on the need for Vince</p> <p>25 to meet with us once Ofcom report published."</p> <p style="text-align: center;">Page 59</p>
<p>1 Q. You are referred to there as "Nick's adviser". The</p> <p>2 first three bullet points, are those, broadly speaking,</p> <p>3 correct or not?</p> <p>4 A. Those are correct. So the meeting was an introductory</p> <p>5 meeting with a representative of industry who I hadn't</p> <p>6 met previously and I had, at this time, a number of</p> <p>7 introductory meetings with other bodies in the creative</p> <p>8 industries. That is, for example, with the BBC, with</p> <p>9 ITV, with some of the American networks. The purpose of</p> <p>10 these introductory meetings was first and foremost to</p> <p>11 set out the nature of the work which that particular</p> <p>12 body conducts and so there was a presentation in broad</p> <p>13 terms of what News Corporation does and what the range</p> <p>14 of its business interests are.</p> <p>15 Q. Thank you. There is one point, which is the fourth</p> <p>16 point, which is in bold type:</p> <p>17 "Honest discussion on the importance for us of</p> <p>18 getting Labour on board/comfortable with the transaction</p> <p>19 as it will influence Cable a lot."</p> <p>20 Can you help us, please, as to whether that is</p> <p>21 accurate?</p> <p>22 A. I have no recollection of that discussion. It is</p> <p>23 possible that Fred Michel mentioned the Labour Party</p> <p>24 during the conversation. What strikes me about the way</p> <p>25 in which this is phrased is there is a, to my mind,</p> <p style="text-align: center;">Page 58</p>	<p>1 Is that accurate or not?</p> <p>2 A. That is not accurate. I have a distant memory, bearing</p> <p>3 in mind this was a half hour meeting 18 months ago.</p> <p>4 I have a distant recollection that there was</p> <p>5 a discussion of a desire by Mr Michel to organise</p> <p>6 a meeting with Mr Cable after the Ofcom reports had been</p> <p>7 published. I was not in any position to facilitate that</p> <p>8 meeting, nor would I have offered to do so, nor would</p> <p>9 I have said that I insist that Mr Cable held such</p> <p>10 a meeting.</p> <p>11 For the record, I don't think that it is the role of</p> <p>12 specialises to insist that ministers should meet with</p> <p>13 people they are not inclined to meet.</p> <p>14 Q. You weren't, of course, Dr Cable's adviser in any event,</p> <p>15 were you?</p> <p>16 A. No, nor was his department one of the departments for</p> <p>17 which I had responsibility.</p> <p>18 Q. If I just touch very briefly, then, on the sixth point.</p> <p>19 This is the creative industry's issue again, I think.</p> <p>20 Is that right, Mr Colbourne? Might this be accurate, or</p> <p>21 not?</p> <p>22 A. This undoubtedly refers to the discussion which we did</p> <p>23 have about the Digital Economy Act. As I explained</p> <p>24 earlier, there were various pieces of secondary</p> <p>25 legislation which flow from that Act. It may be that at</p> <p style="text-align: center;">Page 60</p>

15 (Pages 57 to 60)

<p>1 the time there was an intention to bring something 2 forward and we discussed the handling of that, but in 3 the event, I don't think any such announcement was made, 4 in January or at any other time. So whether Mr Michel 5 has understood the nature of the conversation or not, 6 I am not sure. These matters are still under discussion 7 within government at the moment.</p> <p>8 Q. Is it standard practice for special advisers to make 9 contemporaneous notes of meetings?</p> <p>10 A. It is not something which we are advised on one way or 11 another. I was struck, coming into government, that 12 there is a very strong culture amongst the Civil Service 13 of note-taking and the paper trail is, as it were, the 14 lifeblood of the Civil Service, and the way that it does 15 business, the way in which decisions are minuted and 16 arrived at. There is no such expectation of special 17 advisers. Some do take notes and others are not in the 18 practice of taking notes on a regular basis.</p> <p>19 LORD JUSTICE LEVESON: There may be an issue there. I am 20 sure you are aware of the concern that the Inquiry has 21 heard about and discussed, about precisely what 22 assistance special advisers should be given in 23 connection with taking on what are, after all, brand new 24 duties.</p> <p>25 A. Personally, I think the level of advice and guidance Page 61</p>	<p>1 a personal note-taking habit -- is I scrupulously record 2 action points with an asterisk in my notes. There were 3 no action points recorded for this meeting and I had no 4 discussions with either Vince Cable's department or 5 anyone else about it afterwards.</p> <p>6 MR JAY: The only upshot of the meeting is the email at 7 tab 4 from Mr Michel to you, 7 December, page 13734, 8 which makes no reference to anything apart from 9 assisting the reform process as much as possible in your 10 respective sectors, I paraphrase.</p> <p>11 A. This was a typically warm communication from Mr Michel 12 to follow up on the meeting. He indicates in it that he 13 expects there to be future contacts. In the event, 14 there was no such future contact.</p> <p>15 Q. Yes, well, events changed a couple of weeks after that 16 email, but I think we can leave it there.</p> <p>17 LORD JUSTICE LEVESON: Mr Colbourne, thank you very much. 18 I am grateful to you for providing that piece to the 19 jigsaw. Thank you.</p> <p>20 (The witness withdrew from the witness box)</p> <p>21 MS PATRY-HOSKINS: Sir, the next witness is Mr Giles Crown.</p> <p>22 A. Thank you very much indeed.</p> <p>23 MR GILES HUMPHREY CROWN (sworn) 24 Questions by MS PATRY HOSKINS</p> <p>25 MS PATRY-HOSKINS: Mr Crown, if you would just take a seat Page 63</p>
<p>1 which is given to special advisers is minimal, that 2 a lot could be done to improve it. I recall that when 3 I was employed I was given a copy of the code of 4 conduct, special advisers, together with my contract but 5 there was no more detailed guidance.</p> <p>6 On this specific point, I keep notes for my own 7 personal benefit, as an aide-memoire. But I think it is 8 also good practice if only to keep a short list of 9 bullet points, so that it is clear to any third party 10 who might have reason subsequently to ask about the 11 nature of the meeting what exactly was under discussion.</p> <p>12 LORD JUSTICE LEVESON: As would now transpire, one of the 13 things about this note, which is not a million miles 14 from a concern, is that on the one hand you are doing 15 something for them -- this is the note, not you. 16 I understand your evidence. You are going to insist on 17 this. On the other, they want to do something for you, 18 namely to support the Deputy Prime Minister, and that 19 suggests something which creates an impression which I'm 20 sure you would say simply is not right, in light of what 21 you said.</p> <p>22 A. No, I don't recognise that at all, and there was no 23 discussion of a deal and there was no undertaking to 24 carry out particular actions pursuant to the meeting. 25 One of the things that I do -- and again, it is Page 62</p>	<p>1 and make yourself comfortable. First of all, could you 2 give your full name to the inquiry, please?</p> <p>3 A. Giles Humphrey Crown.</p> <p>4 Q. Mr Crown, you have provided an amended witness 5 statement, now dated 25 June 2012, with 11 exhibits; can 6 you please confirm this is your formal evidence to the 7 inquiry?</p> <p>8 A. That is the case, yes.</p> <p>9 Q. Thank you. I am going to summarise the first three 10 paragraphs of your statement just so that we have an 11 understanding of who you are and why it is that you are 12 here giving evidence to the inquiry. You explain at 13 paragraph 1 that you are a partner in the law firm Lewis 14 Silkin and you are head of media brands and technology 15 department, and that you are here making this statement 16 on behalf of Edward Bowles.</p> <p>17 You make clear that where facts are not within your 18 own knowledge, you have stated the source of your 19 belief, ie from Mr Bowles unless otherwise stated. You 20 are a friend of Edward Bowles and you explain how you 21 met, and you explain that you have been assisting Edward 22 and his family in relation to the matters which we are 23 going to discuss in evidence today --</p> <p>24 A. That's correct.</p> <p>25 Q. -- on a pro bono basis and that Edward has asked you to Page 64</p>

16 (Pages 61 to 64)

<p>1 make this statement to the Inquiry on his behalf. In 2 the circumstances, which we will outline in a moment, he 3 does not feel able to give evidence to the Inquiry 4 himself.</p> <p>5 If I just explain who Mr Bowles is. He is a British 6 national. His wife, Ann, is a Belgian national and 7 their 11-year old son Sebastian tragically died in 8 a coach crash on the evening of 23 March 2012. They 9 also have -- and I say this because it is important for 10 the chronology, which we are going to discuss -- a nine 11 year old daughter, Helena, and you explain that the 12 Bowles family moved to Belgium from London in 2009. 13 I don't think we need to summarise any further their own 14 personal circumstance. That is an accurate summary of 15 the first three paragraphs?</p> <p>16 A. That is all correct.</p> <p>17 LORD JUSTICE LEVESON: Mr Crown, can I just say I am very 18 grateful to you for assisting the Inquiry with this 19 evidence and I am also very grateful to 20 Mr and Mrs Bowles for allowing you to do so. I take the 21 opportunity to extend formally my deepest sympathy to 22 them for the tragedy they have suffered.</p> <p>23 A. Thank you, sir.</p> <p>24 MS PATRY-HOSKINS: In a nutshell, Mr Crown, the purpose of 25 your statement is to describe the media intrusion</p> <p style="text-align: center;">Page 65</p>	<p>1 in the crash who had not died.</p> <p>2 Q. Right. So on that same day, 14 March, Mr Bowles was 3 informed at lunchtime that Sebastian had not survived 4 and he made contact with his wife at that time.</p> <p>5 A. Yes.</p> <p>6 Q. The following morning -- so again, taking matters still 7 chronologically --</p> <p>8 A. Yes.</p> <p>9 Q. -- Thursday 15 March, whilst some families were taken to 10 identify the bodies of their children, the others, 11 including Mr Bowles, his wife and his daughter, were 12 taken to the scene of the crash. Now, I labour on this 13 in some detail because the Helena photograph, as we are 14 going to describe it, was taken at that time?</p> <p>15 A. Yes.</p> <p>16 Q. You explain in paragraph 9 of your statement that the 17 Helena photograph, which only came to Mr Bowles' 18 attention some days after the family returned to 19 Belgium, was taken while Edward and Helena were under 20 the porch of the Hotel des Vignes, which is the hotel we 21 have just been discussing, on private property, waiting 22 for the coach to take them to the tunnel?</p> <p>23 A. Yes.</p> <p>24 Q. The flowers, as you explain, that Edward and Helena 25 carried in this photograph were placed at the crash</p> <p style="text-align: center;">Page 67</p>
<p>1 suffered by the Bowles family in the immediate aftermath 2 of Sebastian's death; is that correct?</p> <p>3 A. That's correct. I have attempted accurately to 4 summarise what happened.</p> <p>5 Q. Right. I am going to take this statement in 6 chronological order insofar as I can, in order to make 7 it simple. We can start, then, at paragraph 8 of your 8 statement. We will start with obviously the tragic 9 accident.</p> <p>10 A. Yes.</p> <p>11 Q. You tell us there that the accident occurred at 9.15 pm 12 on Tuesday 13 March 2012, and that the families were 13 informed of the accident in the early hours of the 14 morning of 14 March.</p> <p>15 A. Yes.</p> <p>16 Q. You explain that Mr Bowles travelled directly from 17 London, arriving -- again, it is important for the 18 chronology, which is why I read it out -- arriving at 19 the Hotel des Vignes. This hotel, which you explain is 20 located in a hamlet near Sierre, had been designated 21 specifically by the Swiss authorities as the centre for 22 parents whose children had been involved in the crash?</p> <p>23 A. That's correct. I do understand from Edward that in 24 fact that hotel was for the families of the victims who 25 had died. There was a separate hotel for those involved</p> <p style="text-align: center;">Page 66</p>	<p>1 scene in the tunnel. Now, we are not going to show 2 today, during the course of this evidence the 3 photograph, the Helena photograph, for obvious 4 reasons --</p> <p>5 A. Yes.</p> <p>6 Q. -- but can you try and describe it for us?</p> <p>7 A. It is a photograph of obviously a young girl crying, 8 carrying flowers and a hand on her head, which is 9 Edward's hand on her head.</p> <p>10 Q. Right. You explain again, giving context to that 11 photograph, that the photographers are not allowed onto 12 the hotel property and had been kept at a distance of 13 about 20 metres by police posted outside the hotel. You 14 also explain that coaches had also been placed behind 15 the hotel gate, between the families and the 16 photographers, in an attempt to obstruct the view of 17 photographers of the bereaved families.</p> <p>18 You say it is clear from the photograph itself that 19 it was taken at a distance without the knowledge of 20 those who were photographed.</p> <p>21 A. Yes.</p> <p>22 Q. How can you tell that from the photograph? Actually, 23 can you just pause there. I am just going to make sure 24 the judge has the correct photograph. It is in the 25 number of places, but if you look in exhibit 3, four</p> <p style="text-align: center;">Page 68</p>

17 (Pages 65 to 68)

<p>1 pages from the back of that exhibit. 2 LORD JUSTICE LEVESON: Yes. 3 MS PATRY-HOSKINS: The bottom photograph on that page. 4 LORD JUSTICE LEVESON: Four pages from the back? 5 MS PATRY-HOSKINS: Four pages from the back. 6 LORD JUSTICE LEVESON: Thank you. 7 MS PATRY-HOSKINS: The photograph at the bottom of that page 8 is the photograph. 9 LORD JUSTICE LEVESON: Thank you. 10 A. I would say it is clear that the photograph is not in 11 any way staged. It is clear that the people in the 12 photograph have no knowledge that they are being 13 photographed, and in the context of Edward's explanation 14 of how people were positioned, it would seem to me the 15 type of photograph that had been taken at a distance. 16 Q. You explain at paragraph 10 that Mr Bowles has in fact 17 confirmed to you that he would never have given consent 18 for the publication of this photograph of his nine year 19 old daughter grieving over the death of her brother in 20 these terrible and distressing circumstances. 21 A. Yes. 22 Q. Now, still on 15 March, please, Mr Crown. You tell us 23 Mr Bowles was later informed by his neighbours in London 24 and Belgium that around this time there were packs of 25 press outside their homes. In addition, you tell us, to</p> <p style="text-align: center;">Page 69</p>	<p>1 after the accident. 2 A. Yes. 3 Q. You tell us that the crash received extensive media 4 coverage at the time. A few days after the crash 5 emerged, there had been a British victim, a fact which 6 then also received extensive media coverage. You put 7 out three particular publications as having published 8 articles about the fact that there had been a British 9 victim. So I am going to take them in turn if I can. 10 A. Yes. 11 Q. I am going to start with the Sun, please, at 12 paragraph 7(a). 13 A. Yes. 14 Q. You tell us that the Sun published an article about 15 Sebastian's death on the front page and continued on to 16 page 5 of its Friday 16 March issue. That is exhibit 2. 17 I am just going to ask you to look at that. 18 A. Yes. 19 Q. We can see the date and the headline: 20 "Tragedy of Sebastian, 11. Brit boy killed on the 21 coach." 22 With a photograph, which I will return to in 23 a moment, which appears to be of Sebastian. 24 A. Yes. 25 Q. Going over to the page 5 extract, it has a picture of</p> <p style="text-align: center;">Page 71</p>
<p>1 journalists calling at neighbours' houses, they also 2 followed neighbours in London along the street, asking 3 them about the Bowles family. In Belgium, the numbers 4 of journalists were so great that the neighbours had to 5 call police to have them cleared away and the police had 6 to return every half an hour or so to move on the 7 journalists that had returned. 8 A. Yes. 9 Q. Again, going through the chronology, paragraph 12 -- 10 A. Sorry, I would just say on that, that is how it was 11 described to Edward and it is from some of the articles 12 which quote neighbours and friends. I think the Mail 13 article talks about the shutters being down at the 14 house, so it seemed to be confirming that there were 15 a lot of journalists around the house at that time. 16 Q. We will look at those articles in some detail in 17 a moment. I just want to finish with paragraph 12 in 18 this section. The family returned to Belgium, you tell 19 us, late on 15 March, and rather than going to their own 20 home, they decided to stay with Mr Bowles' wife and her 21 parents for the first night. 22 A. Yes. 23 Q. I am going to turn now to paragraph 7 in the chronology, 24 because the next date we are going to be looking at is 25 Friday 16 March, so by this stage we are three days</p> <p style="text-align: center;">Page 70</p>	<p>1 a number of children and Sebastian in the bottom 2 right-hand corner. 3 A. Yes. 4 Q. And it has the following headline: 5 "Dearest mama, papa, Helena and Flopsy, I can 6 already ski quite well. We had hotdogs ... it is really 7 great here". 8 That appears to be a quote from Sebastian himself. 9 A. Yes. 10 Q. Can you just give us details of where that quote was 11 obtained from. 12 A. That quote was obtained from a blog that was on 13 a website, not linked to the school website, but 14 a website that was set up for the trip -- for the 15 children on the trip to communicate with their parents, 16 so their parents could find out what was happening on 17 the trip. It was taken -- that quote was taken from 18 Sebastian's postings on that blog, as was the 19 photograph. One can see in the photograph Sebastian in 20 his skiing outfit. 21 Q. Can I just make clear, a website that you say was not 22 linked to the school's website? 23 A. Yes. 24 Q. One which was set up solely for the purpose of allowing 25 children on the trip to communicate with their parents?</p> <p style="text-align: center;">Page 72</p>

<p>1 A. Yes.</p> <p>2 Q. And text and photograph appeared on that website?</p> <p>3 A. That's right.</p> <p>4 Q. Do you know whether it was a fully accessible website or</p> <p>5 whether it had a password to enter it or ...?</p> <p>6 A. There was no password on that website. As Edward has</p> <p>7 summarised through me in the statement, his view was it</p> <p>8 was clearly a website that was intended for parents and</p> <p>9 not for the general public.</p> <p>10 Q. You explain this in some detail at paragraph 24 of your</p> <p>11 statement. For the sake of completeness, you explain</p> <p>12 that neither Mr Bowles nor his wife gave permission for</p> <p>13 publication of any material from this blog. You explain</p> <p>14 the website wasn't protected by a password but it was</p> <p>15 clearly intended only for the parents of the children on</p> <p>16 the trip, so that they could communicate with their</p> <p>17 children and see what they had been doing each day.</p> <p>18 A. Yes.</p> <p>19 Q. Then you tell us this:</p> <p>20 "Once it became known that the media had taken</p> <p>21 information from the website, it was shut down, but this</p> <p>22 in itself caused distress to Mr Bowles, his wife and</p> <p>23 other parents, because it was the only available record</p> <p>24 of their children's final days and hours. Happily, the</p> <p>25 school has now been able to make that information</p> <p style="text-align: center;">Page 73</p>	<p>1 A. That's correct.</p> <p>2 Q. It has just been repeated back to you. You didn't</p> <p>3 witness these conversations yourself?</p> <p>4 A. Not at all, no.</p> <p>5 Q. Again, if I summarise what he has told you about his</p> <p>6 involvement.</p> <p>7 A. Yes.</p> <p>8 Q. He says that he dealt, on the bank's behalf, with</p> <p>9 a number of media inquiries in relation to the story.</p> <p>10 He asked all members of the media to whom he spoke to</p> <p>11 respect the family's privacy and in particular not to</p> <p>12 publish any photographs of the children or to reveal</p> <p>13 their names. He was told that a journalist from the Sun</p> <p>14 had shown up outside the family home in Belgium and he</p> <p>15 then left a message on the Sun's news desk, asking them</p> <p>16 to make sure the journalist left the premises and</p> <p>17 respected the family's privacy.</p> <p>18 A. Yes.</p> <p>19 Q. In a subsequent conversation with the Sun, he spoke to</p> <p>20 one of its news editors and it transpired they were</p> <p>21 going to run a story about Sebastian's death. So two</p> <p>22 conversations -- well, one message and one conversation</p> <p>23 at that stage?</p> <p>24 A. Yes, yes.</p> <p>25 Q. And during the second conversation, it became clear that</p> <p style="text-align: center;">Page 75</p>
<p>1 available to the parents by other means."</p> <p>2 A. Yes.</p> <p>3 Q. Now, just for the sake of clarity, the Sun did not</p> <p>4 publish the Helena photograph that we have referred to?</p> <p>5 A. No.</p> <p>6 Q. Or other photographs which may have been obtained from</p> <p>7 a Facebook page, which we will come on to later. That's</p> <p>8 correct, isn't it?</p> <p>9 While we are staying on the Sun, please, I would</p> <p>10 like us, please, to look at paragraph 21 of your</p> <p>11 statement. This means that the chronology is slightly</p> <p>12 askew, but while we are discussing the Sun's involvement</p> <p>13 in this story, it is important that we remain discussing</p> <p>14 the Sun.</p> <p>15 You explain there -- I will paraphrase this -- that</p> <p>16 the bank that Mr Bowles works for has its own PR firm.</p> <p>17 A. Yes.</p> <p>18 Q. And a gentleman there called Matt Newton who works for</p> <p>19 that PR firm also has had some contact with the media in</p> <p>20 relation to Sebastian's death and the media coverage of</p> <p>21 the accident?</p> <p>22 A. Yes.</p> <p>23 Q. Am I right in saying that what you relate back to us in</p> <p>24 paragraph 21 is from a conversation you have had with</p> <p>25 Mr Newton about his involvement with the media?</p> <p style="text-align: center;">Page 74</p>	<p>1 they were going to run a story. Mr Newton says, or told</p> <p>2 you, that he was firm in expressing the clear desire not</p> <p>3 to participate or talk to any member of the media and</p> <p>4 asked them in particular not to publish any photographs</p> <p>5 of the children. The Sun told him that a photograph of</p> <p>6 Sebastian was already online and therefore they were</p> <p>7 going to run with it in the paper.</p> <p>8 A. Yes.</p> <p>9 Q. Mr Newton made clear that in his view a photograph</p> <p>10 appearing somewhere online was very different from</p> <p>11 publishing it in the Sun and repeated his request not to</p> <p>12 publish any photographs. The following morning, the Sun</p> <p>13 published a large photograph of Sebastian on its front</p> <p>14 page. Mr Newton called the journalist and asked him not</p> <p>15 to take the story any further and stressed the family's</p> <p>16 desire to be left alone.</p> <p>17 A. Yes.</p> <p>18 Q. So can I just clarify the facts?</p> <p>19 A. Mm-hm.</p> <p>20 Q. This would suggest that Mr Newton spoke -- or at least</p> <p>21 left one message and had one conversation with the Sun</p> <p>22 prior to their front page and page 5 story that we have</p> <p>23 already looked at.</p> <p>24 A. Yes.</p> <p>25 Q. During the course of those conversations and messages,</p> <p style="text-align: center;">Page 76</p>

19 (Pages 73 to 76)

<p>1 he made it absolutely clear that the Bowles family did 2 not want to participate in any story about Sebastian? 3 A. That is my understanding, yes. 4 Q. He also made it quite clear to them in particular that 5 he did not want any photographs of the children being 6 published? 7 A. That is what he told me, yes. 8 Q. And he was told that they would run with it? 9 A. Yes. 10 Q. There was also a message about a journalist turning up 11 at their property, and they were told again, in no 12 uncertain terms, that that person should be asked to 13 leave and should not return? 14 A. Yes. 15 Q. Despite those conversations and messages, it is in those 16 circumstances that the Sun did run with the story and 17 did publish a photograph of Sebastian on the front page; 18 is that factually accurate, to the best of your 19 knowledge? 20 A. That is what I was told and I should just clarify 21 perhaps that Mr Newton saw this paragraph and confirmed 22 its accuracy. 23 Q. That is very helpful. For the sake of completeness, if 24 we look at paragraph 13, we can see that in fact, 25 despite all of this and despite the fact that they had</p> <p style="text-align: center;">Page 77</p>	<p>1 your behalf, then please pass on my details." 2 A. Yes. 3 Q. And she apologies again. So far as you are aware -- 4 I know it is not entirely within your knowledge, but as 5 far as you are aware, this visit from the Sun journalist 6 took place at a time when there had already been 7 a conversation between Mr Newton and the Sun news desk 8 about journalists attending the property and after it 9 had been made clear that they simply didn't want anyone 10 to attend their property in that way? 11 A. That would certainly seem to be the case, on the basis 12 of Mr Newton's evidence and what Edward says about this 13 visit. 14 Q. Thank you very much. I am going to turn now to the 15 Daily Mail, if I can. This is 7(b) of your witness 16 statement. 17 A. Yes. 18 Q. You explain that on the same day -- we're still talking 19 about 16 March, the same day that the Sun article 20 appeared. You say that the Daily Mail published an 21 article and online, at dailymail.co.uk. The online 22 article, a true copy of which you say is exhibit 3, 23 included the Helena photograph, the family 24 photographs -- which I will come on to describe in 25 a moment -- and the photograph of Sebastian in his</p> <p style="text-align: center;">Page 79</p>
<p>1 run a front page that day, a further journalist appears 2 to have come to the house of Mr Bowles on Friday 3 16 March. You tell us there that when Mr Bowles 4 returned to the family home with his daughter, waiting 5 at their front door was a woman who Mr Bowles suspected 6 was a journalist. He spoke to her and she identified 7 herself as Caroline Grant from the Sun. 8 A. Yes. 9 Q. He told her he didn't have anything to say to her but 10 she could leave a note. She then left the property and 11 returned to her car, leaving no note. It is made clear 12 that Ms Grant was at all times polite and somewhat 13 apologetic, and the next day a police office in fact 14 handed a note from Ms Grant, which is exhibit 5, 15 together with her business card, which she had handed in 16 at the police station. 17 A. Yes. 18 Q. We can see that at exhibit 5. Paraphrasing it -- 19 A. Yes. 20 Q. -- she apologises for being in contact but she says she 21 wants to leave her details in case there is anything 22 Mr Bowles felt he might like to say about Sebastian as 23 a tribute. 24 A. Yes. 25 Q. "If there is anyone you would rather to speak to me on</p> <p style="text-align: center;">Page 78</p>	<p>1 skiing outfit which was taken from the online blog and 2 which we have already seen in respect of the Sun 3 article. 4 A. Yes. 5 Q. Can we look briefly at exhibit 3, just to look at that, 6 just very briefly. 7 A. Yes. 8 Q. Now, the online version of the article has the quote at 9 the top from the online blog. 10 A. Yes. 11 Q. It then has a photograph of Sebastian which -- and you 12 have put "FP" by the right-hand side of that. I assume 13 that means "Facebook photograph"? 14 A. Yes, that is a photograph taken from Facebook. 15 Q. We can then see a photograph on the right-hand page 16 there -- I should say on the next page -- of Sebastian. 17 A. Mm-hm. 18 Q. Before we turn on to anything further, can I ask you to 19 look very quickly at the text of the article? 20 A. Yes. 21 Q. "A British boy killed in the Swiss coach disaster was 22 known as 'the little cherub', his former headmistress 23 revealed yesterday." 24 Without reading out the whole of the text of the 25 article, that would indicate that the Daily Mail or the</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 Mail Online had spoken to a former headmistress of 2 Sebastian Bowles? 3 A. Yes. 4 Q. A lady who worked at a primary school in London? 5 A. Yes. 6 Q. If we then turn over to the next page, again, there is 7 a photograph of two adults which is also annotated with 8 the ledger "FP"; do you see that? 9 A. Yes. 10 Q. That appears to be a photograph of Mr Bowles and his 11 wife -- 12 A. That's right. 13 Q. -- smiling and in a holiday situation. 14 A. Yes, that's right. 15 Q. And again, a Facebook photograph? 16 A. That came from Edward's Facebook page, yes. 17 Q. We will come on to ask questions about Facebook in 18 a moment, but just for the sake of completeness, there 19 is then a number of pictures also of the crash site. 20 A. Yes. 21 Q. A photograph of some of the police officers carrying one 22 of the coffins. It then has an extract again from the 23 blog. 24 A. Yes. 25 Q. Which we have already discussed, and a number of other</p> <p style="text-align: center;">Page 81</p>	<p>1 A. I don't have a Facebook site myself but I understand 2 there are different privacy settings, one of which is 3 friends only, which in theory means it should only be 4 accessible to those you have accepted as friends on the 5 Facebook site. 6 Q. Is your evidence that he has told he is certain that he 7 had that privacy setting in place? 8 A. That is exactly what he told me, yes. 9 Q. You also explain that he has no friends in the media on 10 his Facebook site. Is that intended to mean that it 11 could not be the case that one of his friends had given 12 permission to publish the photograph? 13 A. My understanding -- 14 LORD JUSTICE LEVESON: All that is saying is he doesn't have 15 anybody who he recognises as being in the media. 16 Whether one of the persons who is his friends actually 17 did is another matter. 18 A. Yes, indeed, exactly. That's correct. 19 MS PATRY-HOSKINS: And perhaps the most crucial point: in 20 any event, even if that were not the case, he did not 21 give, nor would he have given, anyone permission to use 22 or publish these photographs, which were obviously of 23 a private personal and family nature. 24 A. Yes. 25 Q. And you tell us, just for the sake of completeness, that</p> <p style="text-align: center;">Page 83</p>
<p>1 photographs, including photographs of a child laying 2 flowers, photographs of a number of victims of the crash 3 and the Helena photograph, which we have already 4 identified, four pages from the back of that exhibit, 5 annotated "HP"? 6 A. Yes, that's correct. 7 Q. I should have said, for the sake of completeness, that 8 the article also refers to, as you have already said, 9 that the shutters at the house in Leuven had been down 10 and therefore that it is apparent that someone must have 11 looked at the outside of their house in order to be able 12 to refer to that in the article? 13 A. Yes, that's correct. 14 Q. I understand from your witness statement at paragraph 17 15 that in fact Mr Bowles didn't become aware of this 16 article, which is 16 March, until the next day, Saturday 17 17 March? 18 A. Yes. 19 Q. And what you say at paragraph 17 is this: 20 "The photographs could only have been taken from 21 Edward's Facebook site. Edward is certain that he had 22 placed all of his Facebook privacy setting on 'friends 23 only'. " 24 A. Yes. 25 Q. Can you just explain to us what that means?</p> <p style="text-align: center;">Page 82</p>	<p>1 once he found out these photographs had been obtained by 2 the media, he first altered the settings to allow access 3 to the site to him alone, and later he simply 4 deactivated his Facebook account completely and it 5 remains deactivated to this day? 6 A. Yes. 7 Q. I am sure this is absolutely clear, but just so that we 8 are absolutely clear, did anyone ever approach Mr Bowles 9 to say, "Look, we have obtained these photos. Could we 10 have your permission to publish them?" 11 A. Not as I understand it, no. 12 Q. You also tell us that this was really the final straw 13 for Mr Bowles and it was at this stage that he contacted 14 you and said, "Mr Crown, I would be very grateful for 15 your help." 16 A. Yes. I mean, he was very distressed at this point. 17 Q. We will come back to how you dealt with this and the 18 response when we get to it chronologically, I think. 19 A. Yes. 20 Q. Because there is a number of responses to the PCC letter 21 which we will come on to. 22 A. Yes. 23 Q. There is also a very recent letter, which we need to 24 address. We will come back to that. 7(c), for the sake 25 of completeness. You tell us that the Daily Telegraph</p> <p style="text-align: center;">Page 84</p>

21 (Pages 81 to 84)

<p>1 also published an article in its 16 March issue, which 2 included quotes of Sebastian's postings from the online 3 blog and you believe the Helena photograph. You exhibit 4 exhibit 4, a copy of the online article --</p> <p>5 A. Yes.</p> <p>6 Q. -- because you haven't been able to find a copy of the 7 sort of original.</p> <p>8 A. Yes.</p> <p>9 Q. The Daily Telegraph -- there were, in fact, a number of 10 editions that day. They have provided us with a number 11 of different versions of the Daily Telegraph that day 12 and they make the point, quite simply, that the Helena 13 photograph does not appear anywhere in any of those 14 editions.</p> <p>15 A. Yes.</p> <p>16 Q. Is there anything else you want to say about that?</p> <p>17 A. I, of course, accept that. As I said, we were trying to 18 obtain a copy of that issue of the Telegraph, 19 unsuccessfully, and so how this came about is -- one 20 must remember at that point Edward called me and said he 21 thought it was the Mail and Telegraph in particular, and 22 I followed up on that and then had a conversation with 23 the Telegraph, and that conversation is summarised in my 24 statement.</p> <p>25 It wasn't during the course -- in that conversation,</p> <p style="text-align: center;">Page 85</p>	<p>1 A. Yes.</p> <p>2 Q. If we stay on Friday 16 March for the moment and just 3 tie up some loose ends. From paragraph 14 onwards, you 4 tell us that also on 16 March, apart from the visit from 5 the Sun journalist that we have already discussed, it is 6 also clear that a journalist from Blik newspaper had 7 approached a neighbour --</p> <p>8 A. Yes.</p> <p>9 Q. -- and had asked him to approach Mr Bowles and again, 10 a note was left in Mr Bowles' postbox by a journalist. 11 That is exhibit 6.</p> <p>12 A. Yes.</p> <p>13 Q. We don't need to read that out, but it is also clear 14 that the newspaper is asking for an interview or some 15 kind of comment --</p> <p>16 A. Yes.</p> <p>17 Q. -- on the fact that Sebastian has been one of the 18 victims.</p> <p>19 A. Yes.</p> <p>20 Q. You then explain, paragraph 15, that as a result of all 21 of these visits, Edward's family lived with their 22 external window shutters closed because they were 23 concerned about media intrusion.</p> <p>24 A. Yes.</p> <p>25 Q. Now, we now move to Saturday 17 March, so only four days</p> <p style="text-align: center;">Page 87</p>
<p>1 I wasn't told: "We haven't published the photograph." 2 I mean, it may be that we were just talking at 3 cross-purposes, but that was my understanding, that that 4 photograph had been in the Telegraph, because that is 5 what Edward had told me.</p> <p>6 Q. I think you now accept that it may simply not have been 7 published. We will come to your conversation with 8 Mr Gallagher. What the final edition on that day did 9 publish was photographs of a number of the children who 10 had died in the accident.</p> <p>11 A. Yes.</p> <p>12 Q. The photograph of Sebastian taken from the online blog 13 we have already discussed.</p> <p>14 A. Yes.</p> <p>15 Q. And the quotations taken from the online blog as well?</p> <p>16 A. That's correct.</p> <p>17 Q. Sir, I am not sure whether you have copies of these. 18 They were biked over to us recently. I am happy to hand 19 them up. (Handed)</p> <p>20 LORD JUSTICE LEVESON: Thank you very much.</p> <p>21 MS PATRY-HOSKINS: They should be put in exhibit 4 with the 22 online version.</p> <p>23 LORD JUSTICE LEVESON: Thank you.</p> <p>24 MS PATRY-HOSKINS: Now, that deals with paragraph 7 and the 25 three publications that I said we were going to look at.</p> <p style="text-align: center;">Page 86</p>	<p>1 on from the accident.</p> <p>2 A. Yes.</p> <p>3 Q. We have already described a lot of things that happened 4 in those days since the accident took place. Saturday 5 17 March is the day Mr Bowles became aware, as we have 6 explained, of the Facebook photographs being available 7 to the media.</p> <p>8 A. Mm-hm.</p> <p>9 Q. I would also like us, please, to touch on a visit that 10 he received from a journalist from the Mail on Sunday. 11 You tell us that Matt Sandy from the Mail on Sunday 12 arrived without any prior warning at the Bowles' home. 13 He carried a bunch of flowers. Mr Bowles actually 14 opened the door not knowing who he was, because there 15 were quite frequent deliveries of flowers to the family 16 home.</p> <p>17 A. Yes.</p> <p>18 Q. He was in tears at the time. Mr Sandy explained who he 19 was and Mr Bowles relayed to him the same message as he 20 had to Ms Grant and the other journalist, thanked him 21 for the flowers and then closed the door. Then Mr Sandy 22 from the Mail on Sunday left a note.</p> <p>23 A. Yes.</p> <p>24 Q. Which is exhibit 7.</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 88</p>

22 (Pages 85 to 88)

<p>1 Q. Frankly, I don't really need to paraphrase it; we have 2 heard it all before. He apologises for disturbing them 3 but saying, essentially, that telling your world about 4 loved one may offer a grain of support. 5 A. Yes. 6 Q. And he says: 7 "These are all my details. Please be in touch if 8 you feel able to do so." 9 A. Yes. 10 Q. Now, at this point, you become involved, and you explain 11 at paragraph 17 why it is that he decided to contact 12 you, whether you could help him in protecting his 13 privacy at this exceptionally difficult time. 14 A. Yes. 15 Q. The first thing you did was -- I am going to turn to the 16 PCC circulated on the afternoon of the same day, 17 17 March. That is contained at exhibit 1. Now, first 18 of all, you tell us that -- 19 A. Could I just clarify one point? The first thing 20 I actually did was call the PCC. 21 Q. That is what I was going to ask you. 22 A. Sorry, I contacted them on their 24-hour helpline. 23 I spoke to them. 24 Q. To Mr Milloy? 25 A. To Mr Milloy.</p> <p style="text-align: center;">Page 89</p>	<p>1 of editors, you tell us? 2 A. That's right. 3 Q. Can we look very briefly at the letter that you drafted 4 on that day. 5 A. Yes. 6 Q. Bearing in mind, of course, that by this stage at least 7 these three articles we have referred to had already 8 appeared in the press. 9 A. They had, but when I drafted this letter I hadn't 10 actually -- Edward had spoken to me, he had called me. 11 I was coming back home at the time. I got straight home 12 and I started to speak to the PCC and drafted this 13 letter before I had had seen these articles. 14 Q. That is very helpful. Again, I am going to is 15 summarise. You explain at the start who you act for. 16 You explain that Mr Bowles and his family are suffering 17 and they sincerely wish to be left to grieve the death 18 of their son in peace without any media intrusion. You 19 make that absolutely clear. 20 A. Yes. 21 Q. You explain also that despite these pleas, intrusion has 22 happened. You explain in particular at paragraph 4 that 23 intrusive photographs have already been published of 24 them grieving, including photographs of Helena in 25 a distressed state, along with photographs from the</p> <p style="text-align: center;">Page 91</p>
<p>1 Q. Can you tell us about the conversation, please. 2 A. I explained the issues as I understood them at the time 3 and I made clear Edward's concern over the media 4 intrusion and he was sympathetic and I believe he asked 5 me then to put the concerns in writing, which I was 6 planning on doing anyway, to send out a letter to 7 various media outlets, and so I then drafted the letter 8 quickly, as quick as I could, send it to Mr Milloy and 9 I also sent it to various media outlets that I had 10 contact details for as well. 11 Q. Okay. Pausing there, do you know whether, prior to your 12 contact with the PCC, the PCC had had any contact with 13 the Bowles family, or attempted to make any contact with 14 the Bowles family? 15 A. No, I'm almost certain they didn't. There was no 16 mention of that when I spoke to the PCC. 17 Q. Mr Milloy advised you to draft the letter? 18 A. Yes. I mean, obviously I don't know what would have 19 been the reaction if I had not been a lawyer. I mean, 20 I made clear, as I made clear all along, that I was 21 a lawyer but also a friend. So, as I say, I don't 22 know -- he did ask me to put it in writing to the PCC, 23 and then I believe he said he would then send that out 24 to his contacts, as I believe happened. 25 Q. All right. So you sent it both to him and to a number</p> <p style="text-align: center;">Page 90</p>	<p>1 Facebook site which we have already discussed. 2 A. Yes. 3 Q. You explain that intrusion in this way and publication 4 of such photographs is a grave infringement of their 5 privacy. You then set out a number of provisions from 6 the editors' code of practice -- 7 A. Yes. 8 Q. -- including sort of more general ones, for example, 9 that it is unacceptable to photograph individuals in 10 private places without their consent -- 11 A. Yes. 12 Q. -- but also the more specific provisions relating to 13 children and intrusion into grief or shock. Do you see 14 that? 15 A. Yes. 16 Q. I don't want to read them out, but I am sure we are all 17 very familiar with the provisions. 18 A. Yes. 19 Q. But it is important that you drew their attention to it. 20 You say you alerted the PCC to the complaints and you 21 say at paragraph 6 that one of the important concerns of 22 the family is that there is going to be a funeral, it is 23 a strictly private occasion and there can't be any 24 reason or justification for the media attending that. 25 Then you say:</p> <p style="text-align: center;">Page 92</p>

23 (Pages 89 to 92)

<p>1 "We require that all private photographs of the 2 family, including those photographs referred to above, 3 are removed immediately from all media websites and 4 there is no further publication whatsoever of any such 5 photographs. In particular, but without limitation, 6 there must be no taking or publication of any 7 photographs of Helena." 8 A. Yes. 9 Q. So it couldn't really have been clearer on that? 10 A. Can I clarify one point? 11 Q. Of course you can. 12 A. There was a state funeral for all 22 children, which 13 was -- and then there was a separate memorial service 14 for Sebastian. Edward's particular concern was that the 15 memorial service would be private and so I was focused 16 on trying to make sure that happened. 17 Q. So those were the two distinct concerns of the family at 18 that stage, on Saturday 17 March. Those were the things 19 you were particularly drawing to their attention. 20 A. Mm-hm. 21 Q. Do you have any recollection of exactly which editors 22 this was circulated to? Was it just the ones who had 23 already published articles or was it -- 24 A. No, I had -- I sent it to probably about eight contacts 25 in the media, including these ones. But others as well, Page 93</p>	<p>1 Q. So it is in that light and in that context that we look 2 at their response dated 20 March: 3 "Thank you for your letter ..." 4 LORD JUSTICE LEVESON: Just before you go to the response, 5 you say this was sent by email. So there's no delay in 6 anybody getting this letter? 7 A. No, it was sent to, I think, three -- two individuals at 8 the Mail and a general editor's or news email address as 9 well. 10 LORD JUSTICE LEVESON: That is the process you adopted 11 presumably for all the press that you sent it to? 12 A. That's right. 13 LORD JUSTICE LEVESON: Yes, sorry. 14 MS PATRY-HOSKINS: So the chronology is the Mail Online 15 article appears, the next day you send the letter 16 directly to them. 17 A. Yes. 18 Q. On 18th, you send a chaser email? 19 A. Yes. 20 Q. And on 20th, this is the letter you get? 21 A. That's correct. 22 Q. "The photographs published of your clients on holiday 23 (one of Mr and Mrs Bowles and another cropped to show 24 only Sebastian) ..." 25 I will come back to the cropping in a moment: Page 95</p>
<p>1 the main media outlets, those that I had email addresses 2 for, as well as the PCC. 3 Q. You tell us at paragraph 18 that this letter was sent 4 directly to, amongst others, Paul Dacre at the Daily 5 Mail, by email on that same afternoon. 6 A. Yes, that's correct. 7 Q. The reason I refer to that is obviously we have left 8 a loose end with the Daily Mail. You explain that there 9 was no response or acknowledgement. You then sent 10 a follow-up email on 18 March, which did result in 11 a letter in response dated 20 March 2012? 12 A. Yes. 13 Q. And that is exhibited at exhibit 8. If we can have 14 a look at that, please. 15 A. Yes. 16 Q. We remind ourselves, of course, that the Daily Mail and 17 certainly the Mail Online article we have looked at had 18 published not just Facebook pictures but also the Helena 19 photographs. 20 A. Yes. 21 Q. And the online blog photograph and the quotations from 22 the online blog. 23 A. Yes. 24 Q. So obviously a matter of serious concern to Mr Bowles? 25 A. Yes. Page 94</p>	<p>1 "... were taken from Mr Bowles Facebook page on 2 Friday at a time when they were openly accessible. We 3 note that the page's privacy settings have now been 4 increased and as per your request, we have removed these 5 photographs from the website." 6 Then they say: 7 "Your clients have our deepest sympathy and we have 8 no wish to add to their distress. We have now 9 circulated an internal warning detailing the issues 10 raised in your letter of 17 March and setting out your 11 clients' concerns." 12 A. Yes. 13 Q. Now, first of all -- let's take this in stages -- this 14 doesn't deal with all the concerns in the PCC letter and 15 particularly not the Helena photograph? 16 A. Yes. 17 Q. Secondly, is there anything you would like to say about 18 the privacy settings or whether it matters whether they 19 were full privacy settings or no privacy settings at 20 all? 21 A. I can't add to what we have said about privacy settings, 22 other than -- and as I've put in -- I was quite careful 23 in the PCC letter. I put it that either the settings 24 had been circumvented or these photographs had been 25 obviously -- obviously private photographs had been Page 96</p>

<p>1 published from a Facebook page.</p> <p>2 Q. They say they have now removed the Facebook photographs</p> <p>3 from the website; is that correct, to the best of your</p> <p>4 knowledge?</p> <p>5 A. I believe that was correct, yes.</p> <p>6 Q. Did they remove at the same time the Helena photograph?</p> <p>7 A. No.</p> <p>8 Q. If you turn on to exhibit 9.</p> <p>9 A. Yes.</p> <p>10 Q. You tell us this is a true copy of the article currently</p> <p>11 on the website. Now "currently", that means when you</p> <p>12 were drafting this statement?</p> <p>13 A. Yes, it is dated 19 June, so it was --</p> <p>14 Q. So as of 19 June, this was -- we can see that the</p> <p>15 Facebook pictures have indeed been removed.</p> <p>16 A. Yes.</p> <p>17 Q. We still have the extract from the blog and we still</p> <p>18 have, we can see towards the end of that, the Helena</p> <p>19 photograph.</p> <p>20 A. Yes.</p> <p>21 Q. Sir, it is not four pages from the back because a number</p> <p>22 of comments have been added, but it is five pages --</p> <p>23 a number of additional photographs in fact appear,</p> <p>24 including the class photograph and so on.</p> <p>25 LORD JUSTICE LEVESON: Right.</p> <p style="text-align: center;">Page 97</p>	<p>1 Q. 17 March?</p> <p>2 A. Yes.</p> <p>3 Q. "This photograph was not published in the Daily Mail and</p> <p>4 was removed from our website as soon as we became aware</p> <p>5 that its subject was Helena."</p> <p>6 Pausing there, that must have been at some point</p> <p>7 after 19 June, because we have just looked at the</p> <p>8 article as it was on 19 June and it contained the Helena</p> <p>9 photograph; correct?</p> <p>10 A. That's right.</p> <p>11 Q. "I would be grateful if you could convey this to the</p> <p>12 Bowles family, along with our sincere regrets."</p> <p>13 What they say, in essence -- they want to set out</p> <p>14 the circumstances in which they published the photograph</p> <p>15 of Helena. They say the photograph was taken by one of</p> <p>16 the largest press picture agencies in the world on</p> <p>17 15 March and the caption only read "Relatives of victims</p> <p>18 leave the Hotel Des Vignes". The Mail Online didn't</p> <p>19 identify Helena in its caption because it was unaware</p> <p>20 who the subject was, they say.</p> <p>21 They then make a number of comments about the fact</p> <p>22 that they would expect a respectable picture agency like</p> <p>23 EPA to take steps to ensure that they asked themselves</p> <p>24 the correct questions and taken into account appropriate</p> <p>25 considerations and so on.</p> <p style="text-align: center;">Page 99</p>
<p>1 MS PATRY-HOSKINS: That is where we were with the Daily Mail</p> <p>2 and their response to the PCC letter until the fact that</p> <p>3 your witness statement prepared for this Inquiry appears</p> <p>4 to have resulted in a further letter from</p> <p>5 Associated Newspapers dated yesterday.</p> <p>6 A. Yes. I received it about 7 o'clock last night.</p> <p>7 Q. About 7 o'clock last night you received it. Now, I am</p> <p>8 going to pass you a copy, because it has only just come</p> <p>9 in. I saw it this morning.</p> <p>10 LORD JUSTICE LEVESON: Thank you.</p> <p>11 MS PATRY-HOSKINS: I am going to paraphrase it while I have</p> <p>12 it in my hand. Dated 25 June 2012. That is yesterday.</p> <p>13 LORD JUSTICE LEVESON: That is yesterday.</p> <p>14 MS PATRY-HOSKINS: Yes:</p> <p>15 "It has been brought to my attention that</p> <p>16 a photograph we now know to be Helena Bowles was</p> <p>17 published on the Mail Online."</p> <p>18 I should be clear this is from Alex Bannister, the</p> <p>19 group managing editor.</p> <p>20 A. Yes.</p> <p>21 Q. Just pausing there, when were Associated first aware, to</p> <p>22 the best of your knowledge -- when was it first brought</p> <p>23 to their attention that in fact a photograph of Helena</p> <p>24 had been published by them?</p> <p>25 A. Well, certainly with the receipt of my letter.</p> <p style="text-align: center;">Page 98</p>	<p>1 A. Yes.</p> <p>2 Q. "It wasn't until your witness statement to the Inquiry</p> <p>3 that we actually became aware that the girl in the</p> <p>4 photograph was in fact Helena ..."</p> <p>5 And so on. I don't need to read the whole letter</p> <p>6 out.</p> <p>7 A. Yes.</p> <p>8 Q. They do say essentially that they have now taken -- once</p> <p>9 it became clear to them that it was Helena, they have</p> <p>10 now taken the photograph off the website and it doesn't</p> <p>11 appear there anymore.</p> <p>12 A. Yes.</p> <p>13 Q. Is there anything you would like to say about the</p> <p>14 contents of that letter, please, Mr Crown?</p> <p>15 A. I have a number of comments on the letter, if there is</p> <p>16 time.</p> <p>17 Q. Yes.</p> <p>18 A. Firstly, it was clear to them that -- they say the</p> <p>19 caption was "Relatives of victims leaving the</p> <p>20 Hotel Des Vignes". As I have explained, that was</p> <p>21 a hotel specifically for victims who had died. They, to</p> <p>22 my mind, knew that the photograph was of a young</p> <p>23 relative of a victim. On its face, it is clearly</p> <p>24 a grieving young child at that hotel, so clearly must</p> <p>25 have been a relative of a victim.</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

1 My understanding from Edward is that the Facebook
 2 photograph they took of Sebastian -- the cropping that
 3 is referred to in the Associated letter was actually
 4 cropping out Helena. It was a photograph of the two of
 5 them.
 6 The -- and the photograph itself, the other
 7 photograph, the Helena photograph, has Edward in it.
 8 I don't know how that cropping took place, but obviously
 9 Edward is with Helena with his hand on her head. So
 10 he would have been in that photograph as well, and
 11 I don't know how -- but certainly the Facebook
 12 photograph that appeared on the Mail Online of
 13 Sebastian, Edward has told me that was just Sebastian
 14 and Helena, and Helena was cropped out of that
 15 photograph.
 16 Just moving on through the letter, they say they
 17 didn't identify Helena but obviously they did name her
 18 in the article and they say unaware of who the subject
 19 was. As I have said -- I have made some comments on
 20 that.
 21 They talk about reliance on EPA. That is the first
 22 I had heard about the picture agency. We have referred
 23 to some of the provisions of the code that I had quoted
 24 in the PCC letter about my understanding that the
 25 newspaper should take responsibility for the pictures

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1 they published. They said "EPA inform us". It is not
 2 clear to me whether that is informing them now or
 3 whether they made any inquiries at the time of EPA as to
 4 the circumstances in which this photograph was taken.
 5 And they say that they were told it was someone
 6 standing in a public place on the other side of the road
 7 from the hotel. I can't say any more than what Edward
 8 has told me, as summarised in my statement, about where
 9 the individuals were and the circumstances in which that
 10 photograph was taken, and certainly Edward's evidence is
 11 that it was on hotel property and there were steps taken
 12 to shield the families of the victims from the
 13 photographers.
 14 They then say that they had no reason to believe the
 15 photograph had not been taken in a public place or that
 16 relatives did not wish to be observed and photographed,
 17 to which I would -- you know, the photographs speak for
 18 themselves and I find it surprising that they make that
 19 assertion.
 20 They then say -- the letter makes no reference to
 21 the photograph being published on the Mail Online. They
 22 say:
 23 "If the Lewis Silkin letter had alerted us that the
 24 photograph on Mail Online was of Helena, it would have
 25 been immediately removed."

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1 I mean, the letter was written with speed, a general
 2 letter to a number of media editors, as was necessitated
 3 by the circumstances. I would say that they could have
 4 inquired -- I did put in the letter my mobile number and
 5 my email address on the letter and said, "If there were
 6 any questions about the letter, then please get in touch
 7 with me", as indeed the Telegraph did, as I have
 8 summarised in my statement.
 9 Q. Yes.
 10 A. And indeed the PCC or anyone else could have asked if
 11 there was any doubt about which photograph was being
 12 referred to and looking back over the article, I can't
 13 really see, to my mind, any other photograph in the
 14 online article that could have been of an eight year old
 15 grieving, as described in the letter. There are
 16 a number of photographs, of course, but if one looks
 17 through that article, to my mind, it would be fairly
 18 clear which was the Helena photograph.
 19 Q. I am going to put aside that letter if you have finished
 20 making the comments you wish to make.
 21 A. Yes.
 22 Q. I want to stick with EPA, the picture agency concerned
 23 here, because there is something raised by the Sun,
 24 which I think we need to address.
 25 LORD JUSTICE LEVESON: Just before we pass on from this

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1 letter, I think we ought to make clear that we will put
 2 it into the exhibits to Mr Crown's statement so that it
 3 adjoins the others and is available for everybody to
 4 see.
 5 MS PATRY-HOSKINS: Absolutely. We will call it exhibit 12
 6 for those purposes.
 7 LORD JUSTICE LEVESON: Thank you.
 8 MS PATRY-HOSKINS: You will remember, of course, that the
 9 Sun newspaper did not publish the Helena photographs or
 10 the Facebook photographs; it published the photograph
 11 from the online blog.
 12 A. Yes.
 13 Q. The Sun say, much as the Daily Mail do, that that
 14 photograph was distributed internationally by two
 15 picture agencies, one called Kos, the other agency being
 16 EPA, the same picture agency. The Sun want to make it
 17 clear that they obtained that picture from the picture
 18 agency and not from the original website, and it was in
 19 the context that the photograph was being offered
 20 internationally by two picture agencies that the Sun may
 21 have told Mr Newton in that case that the photograph was
 22 already available and that it published it; is there
 23 anything you would like to say about that?
 24 A. I don't think there is anything I can add.
 25 Q. All right. Just, again, taking you through the

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<p>1 chronology -- we have hopefully almost finished it but 2 you explain that was the response to the PCC letter from 3 the Daily Mail.</p> <p>4 A. Yes.</p> <p>5 Q. The response to the PCC letter by the Telegraph is 6 described at paragraph 19 of your witness statement.</p> <p>7 A. Yes.</p> <p>8 Q. Because you explain that the PCC's letter was also sent 9 directly to Mr Gallagher at the Daily Telegraph by email 10 that day. You explain that this resulted shortly 11 afterwards in an e-mail from Mr Gallagher, enquiring 12 whether the letter related specifically to them or was 13 just a general warning. You then rang him and explained 14 that Mr and Mrs Bowles specifically objected to the 15 publication of the Helena photograph. We have now 16 identified, I think, that it is unlikely that the 17 Daily Telegraph did in fact publish the Helena 18 photograph.</p> <p>19 A. Yes.</p> <p>20 Q. Although as you have said previously in evidence, that 21 wasn't made clear to you during the course of this 22 conversation.</p> <p>23 A. No, and in the light of that, it is perhaps slightly 24 strange. This conversation was all around the 25 publication of the picture of Helena.</p> <p style="text-align: center;">Page 105</p>	<p>1 Q. -- asking if, at any stage, Mr Bowles would feel like 2 giving a TV interview about his loss and terrible 3 events, please to contact him.</p> <p>4 Do you know whether the PCC letter was ever sent to 5 any broadcasters, Mr Crown?</p> <p>6 A. I would have to check. I can't say for sure.</p> <p>7 Q. You explain, then, at paragraph 22, for the sake of 8 completeness, that the Inquiry should be aware that the 9 Helena photograph, which is the one which obviously has 10 caused Mr Bowles a great deal of distress, has also 11 appeared in the Belgian media, including on the front 12 page of a Belgian newspaper, and on the front page of 13 a weekly magazine called Moustique.</p> <p>14 A. Yes.</p> <p>15 Q. That is exhibited at exhibit 11. The reason why I ask 16 you to turn that up is because of a distressing incident 17 that took place in respect of it, which is that Edward 18 saw the magazine in a supermarket whilst with Helena, as 19 it was prominently displayed beside the narrow entrance 20 to the main body of the shop, and they were both very 21 upset by it. Not only that, but as they passed it 22 another member of the public pointed to them both.</p> <p>23 A. Yes.</p> <p>24 Q. We can see that very clear picture, which again we are 25 not going to show on screen but which is obviously</p> <p style="text-align: center;">Page 107</p>
<p>1 Q. If I can summarise, he told you -- he told you you were 2 "late to the party" in relation to this matter, that he 3 had in fact known there had been a UK victim some days 4 before it was public but he had held off publishing 5 anything because he in fact knew Mr Bowles. He said it 6 was legitimate to publish the Helena photograph because 7 it was now in the public domain and had been taken in 8 a public place. You explain that you disagreed with him 9 because of her age and the circumstances in which the 10 photograph had been taken. He explained that he didn't 11 want to cause additional distress and would check that 12 the photograph was not available on the Telegraph 13 website, which, of course, pausing there, it is not.</p> <p>14 A. It isn't, and I have attempted here to summarise as 15 accurately as I can the conversation I had with him.</p> <p>16 Q. I don't think we need to look at the rest of the 17 paragraph, which details the relationship Mr Gallagher 18 has with Mr Bowles.</p> <p>19 Moving on to paragraph 20, you explain that 20 Mr Vincent of ITN News also came to the house in Leuven 21 on Monday 19 March. Mr Bowles was out but his 22 brother-in-law answered the door. He was also civil and 23 left a note in the postbox, which is exhibited at 24 exhibit 10 of your statement. A handwritten note --</p> <p>25 A. Yes.</p> <p style="text-align: center;">Page 106</p>	<p>1 a blown-up version of the photograph showing Helena in 2 a very distressed state.</p> <p>3 I then want to take --</p> <p>4 LORD JUSTICE LEVESON: I think we ought to just comment that 5 that is, of course, not a newspaper that is covered by 6 this inquiry.</p> <p>7 MS PATRY-HOSKINS: No.</p> <p>8 LORD JUSTICE LEVESON: But that you make it clear that the 9 Belgian Journalists' Council is investigating certain 10 aspects of the reporting of the accident by the Belgian 11 media, particularly in relation to people in vulnerable 12 positions, such as minors and victims and their 13 families, and that identification must be weighed 14 against the social importance of reporting. So 15 something is happening on that side as well.</p> <p>16 A. That is what Edward has told me as well, yes.</p> <p>17 MS PATRY-HOSKINS: Let's move to witness statement, 18 paragraph 24 onwards.</p> <p>19 A. Yes.</p> <p>20 Q. 24 has already been covered. This is the section on the 21 blog.</p> <p>22 A. Yes.</p> <p>23 Q. Paragraph 25 is the real small grain of comfort, if 24 I can call it that. Following the PCC letter, you tell 25 us that the level of media activity at the Bowles' home</p> <p style="text-align: center;">Page 108</p>

27 (Pages 105 to 108)

1 greatly reduced and there was happily no apparent media
 2 presence at Sebastian's private funeral service.
 3 **A. Yes.**
 4 Q. Then you tell us a bit about the PCC's further
 5 involvement. Mr Dewar at the PCC sent you an email on
 6 26 March, following up on your call with Mr Milloy, in
 7 order to check how the service had gone and whether
 8 there were any ongoing concerns which the PCC may be
 9 able to help with.
 10 **A. Yes.**
 11 Q. You have told us about a bit about your interaction with
 12 the PCC. On this particular occasion, did you consider
 13 the PCC to be helpful in your aim of assisting -- well,
 14 the protection of the family's privacy.
 15 **A. I thought they were sympathetic. I thought it was**
 16 **helpful to be able to get hold of someone on a Saturday**
 17 **afternoon to assist in getting the message out quickly**
 18 **to the media. I thought the point about me -- as we**
 19 **have gone through before, it was me drafting a letter**
 20 **for them. I don't know how they would have dealt with**
 21 **it if it hadn't been a lawyer on the line, but certainly**
 22 **one has to remember that if Edward had been trying to do**
 23 **this, there is absolutely no way that he would have been**
 24 **in a position to draft anything and indeed, I do doubt**
 25 **or -- I am not sure quite how well known that 24-hour**
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1 helpline is. Certainly Edward wouldn't have known
 2 anything about it. The reason I know about it is
 3 because I am a media lawyer.
 4 But -- and I know -- I think probably their
 5 circulation of the letter to whoever they did circulate
 6 it to may have been helpful in dampening down the media
 7 issues. As I say, all I know for sure is that at the
 8 memorial service, there didn't seem to be any --
 9 LORD JUSTICE LEVESON: So you say it is they who circulated
 10 it to editors or did you?
 11 **A. Both. I sent it to the editors that I had details of,**
 12 **but I believe -- or certainly what Mr Milloy said was**
 13 **that he would also send it to the PCC contact list of**
 14 **editors and other PCC contacts. So I think both**
 15 **happened.**
 16 LORD JUSTICE LEVESON: All right.
 17 MS PATRY-HOSKINS: Do you know if the PCC did circulate --
 18 **A. No, no --**
 19 Q. Did they ever tell --
 20 **A. No, they didn't. That is just what we discussed in the**
 21 **conversation, that if I got him a letter then he would**
 22 **sent it round to the PCC contacts. I think he said he**
 23 **would sent it round with a comment from the PCC alerting**
 24 **the editors to the relevant provisions of the code. But**
 25 **I don't actually know first-hand whether that actually**
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1 **happened.**
 2 Q. Can you think of anything else that they might have done
 3 that would have been helpful?
 4 **A. Well, I mean, obviously by the time you call that number**
 5 **the damage has effectively been done. I mean, it was**
 6 **helpful to make sure -- as I said, one of the main aims**
 7 **was the memorial service. But, you know, Edward was**
 8 **very distressed by that point. I was calling them to**
 9 **try and help, but there was a lot of damage already**
 10 **done. The pictures had already been published. So**
 11 **I suppose the main point to my mind is why what appeared**
 12 **to me fairly clear code provisions hadn't been complied**
 13 **with by the media, because in these sort of situations**
 14 **there is only so much you can do once the photographs**
 15 **and information is out in the public domain.**
 16 Q. What could the PCC have done to prevent that happening,
 17 if anything?
 18 **A. I think all that they could really have done -- well,**
 19 **I suppose, have a structure that means that the press**
 20 **are more likely to comply with those code provisions**
 21 **which would be to my mind some sort of commercial**
 22 **incentive or fines, or something along those lines, that**
 23 **means -- because part of this, as one can see, there is**
 24 **a certain degree of competition amongst the media to get**
 25 **the story, to get the photograph, and there seems to me**
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1 **a lack of a consideration from the individual media as**
 2 **to whether they themselves are doing the right thing or**
 3 **whether just because someone else has published**
 4 **a photograph or just because a photograph is available**
 5 **it gives them a right or a get-out in publishing it**
 6 **themselves.**
 7 Q. I understand. All right. Is there anything else you
 8 would like to say about the PCC before I move to the
 9 final paragraphs in your statement?
 10 **A. No.**
 11 Q. Paragraphs 26 and 27, then, please. I am just going to
 12 paraphrase these because they are important. You say
 13 Mr Bowles would like to make it clear that he did not
 14 object to the media's reporting of the accident in
 15 itself as he recognises it was a tragedy of national
 16 importance for Belgian and also Switzerland.
 17 He also acknowledges the fact that his son was the
 18 only victim of UK nationality provided the UK media with
 19 a reason to focus on the story more than it otherwise
 20 might and to draw attention to Sebastian's death in
 21 doing so.
 22 He observes that the reporting of the death had the
 23 effect, almost certainly unintended, that he had no need
 24 to contact anyone to inform them about Sebastian's part
 25 in the tragedy. However, he did and he does object to
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<p>1 the nature of the media cover and the intrusion as you 2 have already detailed. 3 A. Yes. 4 Q. You also say, at paragraph 27 -- 5 LORD JUSTICE LEVESON: Could you read this out slowly, 6 please? 7 MS PATRY-HOSKINS: Paragraph 27? 8 LORD JUSTICE LEVESON: Yes. 9 MS PATRY-HOSKINS: I will read it out verbatim: 10 "Edward has agreed to provide this evidence to the 11 Inquiry, on request, solely for the assistance of the 12 inquiry, and because the incident occurred whilst the 13 Inquiry was underway. Edward and his family are not 14 public figures, but have through personal tragedy been 15 caught up in a public event. The Bowles family have not 16 made and will not be making any public statement to the 17 media in relation to these matters. Their agreement to 18 provide this evidence to the Inquiry in no way should be 19 taken as waiving their right to privacy or their desire 20 to be left alone by the media to continue to grieve over 21 their son's tragic and untimely death." 22 Is there anything, Mr Crown, you would like to add 23 to that final paragraph? 24 A. I would just like to try and make clear that Edward and 25 the family have no wish to have a fight with the media Page 113</p>	<p>1 email address was used on the Saturday. But if it was 2 to Mr Dacre it is unlikely it would have reached him on 3 a Saturday. The managing editors have the 4 responsibility on that day, and it is open and available 5 to the Commission to contact the managing editors if 6 that is a matter of urgency. 7 LORD JUSTICE LEVESON: Yes, well, it might be -- there are 8 a number of questions, aren't there, Mr Caplan. 9 Firstly, I am slightly concerned that the PCC left it to 10 Mr Crown to draft a letter; one would have thought they 11 could have done that with the barest of details, and one 12 could then have thought that they would say "Don't you 13 bother sending it to anybody, we will send it to 14 everybody who needs to know". It may be that we will 15 receive some response about that. 16 But I am sure you will appreciate why, in the light 17 of the fact that this occurred in March, after we had 18 been going four months, if not nine months if you take 19 it from last July, I felt it was important, if the 20 Bowles were prepared to allow this evidence to be 21 deployed. 22 MR CAPLAN: Yes. All I would say is the photographs that we 23 understood were the subject of concern were taken down 24 on the Monday and this letter, which I leave you, sir, 25 obviously, to read, deals with the Helena photograph. Page 115</p>
<p>1 in any sense. They gave evidence reluctantly and after 2 much consideration to this Inquiry because they felt it 3 was the right thing to do. They are disappointed that 4 with regard to such an immense tragedy they would have 5 expected some greater restraint from the media in the 6 way the tragedy was reported and in Edward's view that 7 wasn't the case. 8 Just to emphasise, their overriding desire that 9 their privacy is maintained as it is still, as you will 10 understand, a very recent event and additional publicity 11 at this point would greatly aggravate the family's 12 briefing. 13 Q. Mr Crown, thank you very much. Is there anything else 14 you wish to add? 15 A. No, thank you. 16 Q. I have no further questions. 17 LORD JUSTICE LEVESON: Thank you very much. 18 Mr Crown, I repeat my gratitude to you and the 19 Bowles and my expressions of deepest sympathy. 20 A. Thank you, sir. 21 LORD JUSTICE LEVESON: Yes, Mr Caplan. 22 MR CAPLAN: Can I mention one matter in relation to the PCC, 23 and that is they do have the contact numbers for 24 managing editors, both telephone and email, for urgent 25 inquiry and contact. I don't know, obviously, what Page 114</p>	<p>1 I do apologise to the family, but my clients did not 2 appreciate that that was her; it would have been taken 3 down earlier. 4 LORD JUSTICE LEVESON: There it is. 5 Thank you very much, Mr Caplan. 6 Right. 2 o'clock. Thank you. 7 (12.56 pm) 8 (The short adjournment) 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 Page 116</p>

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