

<p>1 Wednesday, 25 January 2012</p> <p>2 (10.05 am)</p> <p>3 LORD JUSTICE LEVESON: I think you've been here under oath,</p> <p>4 Mr Mahmood, so it remains extant.</p> <p>5 MR MAZHER MAHMOOD (on former oath)</p> <p>6 MR BARR: Good morning, sir. Before I commence my</p> <p>7 questioning of Mr Mahmood, it perhaps would be sensible</p> <p>8 if I adduce by summary the evidence of Mr Greenslade,</p> <p>9 who has provided a witness statement and exhibits which</p> <p>10 are relevant to Mr Mahmood's evidence.</p> <p>11 LORD JUSTICE LEVESON: Yes.</p> <p>12 MR BARR: The witness statement is dated 17 December of last</p> <p>13 year, and it was provided to the Inquiry after</p> <p>14 Mr Mahmood gave evidence last year.</p> <p>15 Mr Greenslade tells us that in 1988 he was the</p> <p>16 managing editor, news, of the Sunday Times, the person</p> <p>17 in overall charge of the news gathering and news</p> <p>18 production department. He tells us that in December</p> <p>19 1988 the paper received a complaint from a police</p> <p>20 officer about a story written by one of the reporting</p> <p>21 staff, Mr Mahmood, which had been published in the</p> <p>22 Sunday Times some months before. That story alleged</p> <p>23 that a chief inspector had been demoted to constable</p> <p>24 following a conviction for drink driving. The complaint</p> <p>25 was that the chief inspector had in fact been demoted</p> <p style="text-align: center;">Page 1</p>	<p>1 reported to Mr Peter Roberts, the managing editor, and</p> <p>2 he ordered the paper's systems editor, Mr Bryan Silcock,</p> <p>3 to investigate further. He ran an audit check to trace</p> <p>4 the origin of the file, and he wrote a report to</p> <p>5 Mr Roberts dated 17 December 1988, a copy of that report</p> <p>6 is attached.</p> <p>7 The report relates how Mr Mahmood had entered the</p> <p>8 computer room and, assisted by the systems operator, had</p> <p>9 retrieved versions of the agency file. Mr Silcock</p> <p>10 managed to find versions of the original report, that</p> <p>11 showed they had correctly stated the demotion was to</p> <p>12 inspector. The conclusion of Mr Silcock's report was</p> <p>13 that he could not see any explanation for the</p> <p>14 differences, except that the audit file was altered, and</p> <p>15 there could be no doubt that the reports from the Devon</p> <p>16 News Agency were correct.</p> <p>17 On receiving Mr Silcock's report, Mr Greenslade</p> <p>18 asked Mr Williams to question Mr Mahmood. He admitted</p> <p>19 going to the computer room, but denied having tampered</p> <p>20 with the file.</p> <p>21 Mr Greenslade did not have the power to fire a staff</p> <p>22 member, so he asked the editor, who was then</p> <p>23 Mr Andrew Neil, to convene a meeting of senior</p> <p>24 executives to discuss the case, and such a meeting was</p> <p>25 convened. Mr Roberts and Mr Greenslade explained the</p> <p style="text-align: center;">Page 3</p>
<p>1 only to the rank of inspector.</p> <p>2 Mr Greenslade asked his news editor,</p> <p>3 Michael Williams, to look into the complaint.</p> <p>4 Mr Williams had told him that Mr Mahmood had informed</p> <p>5 him that the error was due to a mistake by the news</p> <p>6 agency that had filed the original story. That's to</p> <p>7 say, the Devon News Agency. So Mr Greenslade asked</p> <p>8 Mr Williams to get in touch with the agency in order to</p> <p>9 ascertain how the mistake had been made.</p> <p>10 Mr Williams reported back that the agency had</p> <p>11 checked its transmission; it showed that its story had</p> <p>12 correctly stated that the demotion was to inspector,</p> <p>13 rather than constable. The agency sent a copy of its</p> <p>14 original to Mr Williams.</p> <p>15 Mr Williams then contacted the Sunday Times'</p> <p>16 computer room to ask for a copy of the file sent by</p> <p>17 Devon News. He noted that it says "constable" rather</p> <p>18 than "inspector", in contrast to the file which had been</p> <p>19 sent to him directly by the agency. During Mr Williams'</p> <p>20 conversation with the computer room operative, he was</p> <p>21 told that Mr Mahmood had recently visited the computer</p> <p>22 room, which was off limits to editorial staff.</p> <p>23 After checking once more with the Devon News,</p> <p>24 Mr Williams and Mr Greenslade suspected that Mr Mahmood</p> <p>25 may have tampered with the file. The matter was</p> <p style="text-align: center;">Page 2</p>	<p>1 details of the case and were asked to make</p> <p>2 recommendations. They recommended dismissal. That</p> <p>3 recommendation was accepted and it was decided that</p> <p>4 Mr Roberts would inform Mr Mahmood.</p> <p>5 However, when they emerged from the meeting, they</p> <p>6 found that Mr Mahmood had already resigned. There were</p> <p>7 envelopes on Mr Greenslade's desk and Mr Williams'.</p> <p>8 In that event, no further action was taken.</p> <p>9 Mr Greenslade tells us that in his mind, Mr Mahmood had</p> <p>10 resigned to avoid the embarrassment of being officially</p> <p>11 dismissed.</p> <p>12 The exhibits are not only the report but also</p> <p>13 Mr Mahmood's letter of resignation.</p> <p>14 LORD JUSTICE LEVESON: Which says:</p> <p>15 "Because of the nature of my work, I am only able to</p> <p>16 operate with the absolute support and trust of my senior</p> <p>17 colleagues and lawyers, but now that my honesty and</p> <p>18 integrity as a journalist is in question, I feel that</p> <p>19 there is no longer a place for me on the paper."</p> <p>20 MR BARR: That's right.</p> <p>21 LORD JUSTICE LEVESON: Yes.</p> <p>22 MR BARR: Can I confirm that the cameras are off? Thank</p> <p>23 you.</p> <p>24 Questions by MR BARR</p> <p>25 MR BARR: Mr Mahmood, you've provided the Inquiry with</p> <p style="text-align: center;">Page 4</p>

<p>1 a third witness statement. Are the contents of your 2 witness statement true and correct to the best of your 3 knowledge and belief? 4 A. Yes, they are. 5 Q. Dealing first with the circumstances in which you left 6 the Sunday Times in 1988, you deal with those from 7 paragraph 23 onwards in your most recent statement, and 8 you tell us that you've considered your letter of 9 resignation and the newspaper's internal report at the 10 time and you accept the contents of the report now, as 11 you did in 1988. You say that you did not challenge the 12 report at the time, but chose to leave before you were 13 disciplined because you would resign rather than be 14 dismissed. 15 You say you regret your actions in 1988 when you 16 were a very junior reporter, keen to impress. You say 17 you realise that you'd acted improperly and that this 18 would be unacceptable at the newspaper. Is that right? 19 A. Correct. 20 Q. At that time, you were 25 years old, weren't you? 21 A. 24, actually. 22 Q. 24 years old, and you'd been practising as a journalist 23 since your teens? 24 A. Correct. 25 Q. Tampering with the computer file in order to pass the</p> <p style="text-align: center;">Page 5</p>	<p>1 Q. Tab 13, I'm told. Right at the back. 2 A. Okay. 3 Q. If you look on page 4, line 11, my question which I was 4 putting was: 5 "Is it right that you left the Sunday Times under 6 something of a cloud the first time around?" 7 And you replied: 8 "We had a disagreement; correct." 9 A. Absolutely. I was acknowledging that I did leave under 10 a cloud and hinting at the disagreement -- you didn't 11 ask any supplementary questions and, you know, it wasn't 12 a highlight of my career, obviously, it's not something 13 that I elaborated on, you know. 14 Q. Can we explore, first of all, whether or not there was 15 in fact a disagreement, because your current witness 16 statement, your third witness statement, says that you 17 accept the contents of the report now, as you did in 18 1988. 19 A. Absolutely. What I was referring to by "disagreement" 20 was that I had a disagreement with Mr Greenslade, who 21 didn't like the way that I worked, you know, didn't 22 like -- I felt he didn't like me, and ever since has 23 displayed obsessive hostility towards me. There were 24 a number of run-ins I had with him. There were 25 disagreements over several stories.</p> <p style="text-align: center;">Page 7</p>
<p>1 mistake from yourself to the Devon News Agency was 2 wrong, wasn't it? 3 A. Absolutely. Look, I was a young reporter and I'd had 4 a series of run-ins with Mr Greenslade while at the 5 paper, and, you know, I'd made a mistake, I acknowledge 6 that, and rather than incur the wrath of an executive 7 I didn't get on with, I foolishly thought the best way 8 would be to cover my mistake. It was the wrong thing to 9 do, and I resigned. 10 Having said that, it was a quarter of a decade 11 ago -- 12 LORD JUSTICE LEVESON: It was actually 23 years ago, wasn't 13 it? 14 A. Well -- 15 LORD JUSTICE LEVESON: But my concern is what you said to 16 me, which wasn't 23 years ago, or indeed much more than 17 23 days ago, and I think we could just look at that, 18 please. 19 MR BARR: Indeed we will, because -- and just before we do, 20 you say "mistake"; we are talking about an act of 21 dishonesty, aren't we? 22 A. Sure. Absolutely. 23 Q. When I asked you about it, the transcript starts on 24 page 3 and runs over to page 4. 25 A. Sorry, what tab is that?</p> <p style="text-align: center;">Page 6</p>	<p>1 Q. We'll come to that in a moment, but isn't the position 2 that your answer to me was disingenuous because the true 3 position was that you had left the Sunday Times because 4 you had committed an act of dishonesty -- 5 A. Correct, absolutely -- 6 Q. -- which you were ashamed of, ashamed of then and now? 7 A. I accept that very much so. I accept that. But the 8 background to it is that I had a history of 9 disagreements with one executive on the paper. As you 10 noted my resignation letter, I was referring to other 11 stories as well where I'd been questioned, you know, so 12 it was an ongoing thing. But that was the final straw. 13 And I acknowledge it was wrong, I was young, I was 14 naive, it was a foolish thing to do, I acknowledge that. 15 Q. You say you were young and naive. You'd been working as 16 a journalist for several years? 17 A. Sure. 18 Q. What you did was plainly wrong, wasn't it? 19 A. I acknowledge that. I acknowledge that, absolutely, but 20 you know there was intense pressure at the time. It was 21 a tough time, my first with the Sunday Times. 22 Q. There has been some recent writing on this issue, and 23 there's an article which has been brought to the 24 Inquiry's attention in the British Journalism Review. 25 The article was published in December of last year by</p> <p style="text-align: center;">Page 8</p>

<p>1 Mr Michael Williams and has a slightly unseemly title of 2 "I've seen the future and it's crap." 3 A. Yes. 4 Q. If we turn to page 39 of that article -- 5 A. What tab? Which tab is that? 6 Q. Tab 12, I'm told. It's right at the very back of my 7 bundle. 8 A. Right. 9 Q. Mr Williams says towards the bottom of that page: 10 "At the very least there was a great deal of 11 reckless risk-taking -- not exactly discouraged by the 12 News International corporate ethos. I summarily 13 dismissed a reporter who was caught trying to cover his 14 mistakes by offering a financial bribe to the staff in 15 a newspaper computer room to falsify his copy (something 16 he has never subsequently denied). Shortly afterwards 17 he went seamlessly on to a senior job at our sister 18 paper, the News of the World, where his 'scoops' were 19 celebrated. This autumn he was rehired by the 20 Sunday Times as an 'undercover reporter'. All corporate 21 memory of scandal had been erased." 22 There's no doubt, is there, that Mr Williams is 23 referring in that article to you? 24 A. Absolutely, and it's a completely untrue allegation, and 25 can I also point out Mr Williams himself left the Page 9</p>	<p>1 thorough, as they are now. It's just completely untrue. 2 Q. I want to now move to your relationship with 3 Professor Greenslade, as he now is, back in the 1980s 4 when you were working on the Sunday Times. You say that 5 there were several disagreements. The Inquiry has been 6 provided with information which suggests that 7 Professor Greenslade doesn't accept that. He can't 8 recall any disagreements. 9 A. Well, I say -- 10 Q. Might you be mistaken in your recollection? 11 A. No, definitely not mistaken. This is a man who has 12 written articles saying "Why I'm out to nail 13 Mazher Mahmood". I think his agenda is very clear. He 14 didn't like me then, doesn't like me now. 15 Q. It's certainly right to say that Professor Greenslade 16 has published a number of articles critical of some of 17 your work. It's also right, though, that he has on 18 other occasions praised your work, isn't it? 19 A. Right. I don't know what the proportion is, but the 20 majority of his work is very critical. 21 Q. He praised your work in exposing the Pakistani cricket 22 match-fixing, didn't he? 23 A. Yes, he did. Hard not to, to be honest. 24 Q. And your expose involving the Duchess of York? 25 A. I don't know whether he praised that or not. Page 11</p>
<p>1 Sunday Times under somewhat of a cloud. I don't know 2 the precise details, but his employment was terminated 3 in 1994 and I think the reasons are shrouded in secrecy 4 because of some deal he struck through his solicitor 5 Schillings. 6 But that allegation is completely untrue and even 7 Mr Greenslade, who is known to be very critical of my 8 work, yesterday in his blog said that was news to him. 9 He found it surprising. It's simply untrue. 10 Q. I want to be specific. We know from the documents that 11 Professor Greenslade has provided, and which you have 12 not disputed, that you resigned before being dismissed, 13 but the specific allegation there is there was an offer 14 of a financial bribe to staff in the computer room to 15 falsify copy. Is that true? 16 A. That's completely untrue. I did not bribe anybody. 17 LORD JUSTICE LEVESON: Just before we leave that page, do 18 you recognise how he describes working at the newspaper 19 further up the sheet: 20 "Take the story to breaking point and then ratchet 21 it back a notch. Unfortunately many journalists at 22 Wapping conveniently forgot about the last bit, as they 23 got carried away in the Wild West atmosphere." 24 A. No, I don't recognise that at all. I mean, the 25 Sunday Times is very, very strict, they're very Page 10</p>	<p>1 Q. Can we move now to the evidence which you gave about the 2 Turcu case? We learnt at the end of your oral evidence 3 that there had been an appeal against the judgment which 4 you had exhibited to your second witness statement, and 5 that the appeal had been compromised. There was no 6 mention of the appeal in your witness statement, was 7 there? 8 A. Well, if you look at my second witness statement, in 9 paragraph 22, I think it was, I think I hinted at it. 10 In fact, it's something that should be heard. I think 11 it's something that the Inquiry should hear about, 12 because it illustrates how ludicrous the conditional fee 13 arrangement is. It's ludicrous. 14 Alin Turcu is a man that we said was involved in the 15 Beckham kidnap plot. Transpired that in fact it's not 16 Alin Turcu at all. That was a name he'd stolen. His 17 real name is Bogdan Maris, a name that he'd taken from 18 somebody he'd met in prison while in Romania. So in 19 a sense we'd libelled an imposter. 20 He then takes us to court for libel on a conditional 21 fee basis. During the trial he was not in touch, 22 I understand, with his barrister, David Price, and we 23 win, Lord Justice Eady ruled that there definitely was 24 a plot, and we won. Despite the fact we won, it cost us 25 so much money, it was an absolutely fortune despite Page 12</p>

<p>1 having won. I think Mr Justice Eady said at the time 2 that the position of the News of the World was wholly 3 unenviable, which indeed it was.</p> <p>4 Following that, one of the informants on that story 5 had turned against me and the paper and, encouraged by 6 Mr Greenslade -- Mr Greenslade introduced him to 7 David Price and he then made a statement and eventually 8 an appeal was launched.</p> <p>9 I was told that purely on the grounds of cost -- you 10 know, it made economic sense not to pursue this, easier 11 to give Bogdan Maris or Turcu or whatever his name was, 12 better to pay him off than go back into court and incur 13 costs yet again.</p> <p>14 Q. I want to explore some of that reply a step at a time. 15 Can we start first of all with paragraph 22 of your 16 second witness statement.</p> <p>17 A. Where is that in the bundle?</p> <p>18 Q. It should be in the original bundle.</p> <p>19 A. And it's on the screen.</p> <p>20 Q. Sure. You say: 21 "In a related libel trial [this is related to the 22 Victoria Beckham kidnap story] (brought by a member of 23 the gang who had been reported to have been involved in 24 the discussions -- the newspaper apologised to him) 25 Mr Justice Eady said ..."</p> <p style="text-align: center;">Page 13</p>	<p>1 what I was referring to there was that allegations of 2 fabrication of stories was simply not true, and this 3 was -- this case was illustrating that, that 4 Mr Justice Eady had ruled that our evidence was valid, 5 having gone through every tape of every conversation. 6 So it was in that context I mentioned it.</p> <p>7 But as I say, it's something that I should have 8 mentioned, because I feel it's something the Inquiry 9 should be aware of, that you can get petty criminals 10 like Bogdan Maris or Alin Turcu and they walk away with 11 money, despite being villains.</p> <p>12 Q. Let's explore what the appeal involved. As you've 13 pointed out a moment ago, at the first trial the 14 claimant did not give evidence?</p> <p>15 A. He was not in touch with his brief.</p> <p>16 Q. It's right, isn't it, that part of the appeal involved 17 the service of a witness statement from Mr Turcu and 18 assertions by Mr Turcu that he was going to come and 19 attend any retrial of the matter?</p> <p>20 A. Right. The first time I've seen these documents have 21 been recently. I was not privy to these. It was all 22 dealt with by our legal department. I was only told 23 about the apology afterwards and it was explained to me 24 that it wasn't viable on commercial grounds. Perhaps 25 these are questions best addressed to our legal team.</p> <p style="text-align: center;">Page 15</p>
<p>1 I'm going to read on in a moment, but before I do 2 that, that's the apology you're referring to in your 3 third witness statement?</p> <p>4 A. That's right, that we apologised to him, so obviously it 5 follows that we had settled with him in some way.</p> <p>6 Q. Does it, Mr Mahmood? Because in the judgment at first 7 instance, although the judgment was for 8 News International, News International had not won every 9 factual dispute, had it? In particular, the judge had 10 not found that there was a gang, only a loose 11 association of criminals prepared to take whatever 12 opportunities presented themselves?</p> <p>13 A. Right, but we won the libel action.</p> <p>14 Q. And so what apology were you there referring to? Was it 15 a --</p> <p>16 A. This was following the appeal that we thought we don't 17 want to go ahead with this appeal, we don't want to go 18 back to court and incur further costs, so the newspaper 19 apologised to Turcu or Bogdan Maris. I was only told 20 about it after it happened, actually.</p> <p>21 Q. It's singularly unclear in your witness statement, isn't 22 it, that there was an appeal, that there was a great 23 deal of fresh evidence on the appeal and the appeal was 24 compromised?</p> <p>25 A. Paragraph 22 was under the subheading "Fabrication" and</p> <p style="text-align: center;">Page 14</p>	<p>1 Q. Well, you've seen the documents now?</p> <p>2 A. I have.</p> <p>3 Q. So I think you can answer the questions on the basis of 4 what you've seen --</p> <p>5 A. What tab are they?</p> <p>6 Q. We can go through them if you wish, but I can put 7 them --</p> <p>8 A. Okay.</p> <p>9 Q. -- more quickly.</p> <p>10 A. Sure.</p> <p>11 Q. In addition to Mr Turcu's witness statement, there was 12 also a statement from Mr Gashi, wasn't there?</p> <p>13 A. That's correct. As I said, Mr Greenslade had put 14 Mr Gashi in touch with David Price.</p> <p>15 Q. And Mr Gashi's witness statement, the substance of it 16 was that the whole story had been a set-up?</p> <p>17 A. That's right. Mr Gashi is -- made numerous allegations, 18 but clearly his statement doesn't tally with the 19 findings of Mr Justice Eady, and the background to Gashi 20 is that he was an informant of mine, provided 21 information, and was always vetted by myself and always 22 found to be accurate at the time.</p> <p>23 I fell out with him after he was deported as an 24 illegal immigrant, and he turned against me because he 25 felt that I should in some way have assisted him in</p> <p style="text-align: center;">Page 16</p>

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<p>1 gaining stay in this country. He said, "Look, I've 2 helped you, you have connections with the Home Office, 3 you should have helped me stay in this country." 4 So having landed back in Albania, he turned against 5 me and made phone calls to Mr Greenslade. 6 Mr Greenslade -- made a series of allegations. 7 Greenslade advised him to talk to police. He also put 8 him in touch with Mr Price. So that's the background to 9 Gashi. 10 Q. Mr Gashi also alleged, didn't he, that not only was the 11 story a set-up, but also it was a set-up at your 12 instigation? 13 A. It doesn't -- as I say, Mr Justice Eady went through all 14 the evidence, and I think it's very clear, his 15 conclusion is very clear. So Mr Gashi is lying. 16 Q. But the point is, Mr Mahmood, that Mr Justice Eady 17 didn't have Mr Gashi's evidence, did he? This was fresh 18 evidence that the appellant wished to use. 19 A. No, but Mr Justice Eady had access to every single tape. 20 Q. Mr Gashi went so far, didn't he, as to allege that there 21 was no plot? 22 A. As I say, Mr Gashi has -- since his deportation has made 23 a variety of bizarre and ludicrous allegations. 24 Q. In addition to the statement -- 25 A. And that, I think that during the cricket trial he</p> <p style="text-align: center;">Page 17</p>	<p>1 gun or not? 2 A. No, I do not, no. 3 Q. So you -- 4 A. But we are aware that one of the members of the gang had 5 a weapon, we're certainly aware of that, and our 6 evidence showed that. Where it came from, I don't know. 7 Q. The third witness on that subject was the girlfriend of 8 the owner of the gun, who said that she had hidden the 9 gun. 10 A. Sorry, she was the girlfriend of who? Of Gashi, 11 I think. 12 Q. We can look that up. 13 A. No, it was Gashi's girlfriend. 14 Q. Gashi's girlfriend said -- Dominique Maurice(?), yes, 15 you're right, said that she had hidden the gun. 16 A. She would say whatever Gashi told her to say. As I say, 17 you're going off on a tangent here, the gun thing. We 18 saw a gun on the video, one of the gang had a gun. For 19 Gashi to claim that it was his gun, it was a replica, 20 you know, it's a matter for him. 21 Q. It's quite important, isn't it, because Mr Gashi is 22 saying it was all a set-up which he had instigated, and 23 he was the person who had provided the replica gun; 24 that's an important fact, isn't it? 25 A. Not at all. As I say, Mr Justice Eady went through</p> <p style="text-align: center;">Page 19</p>
<p>1 approached them, spoke to police, police disregarded 2 him, said that he was unreliable, he was mentally 3 unstable, he's attempted suicide twice, so they didn't 4 regard him as a credible witness. 5 Q. Could you please listen to the question: in addition to 6 the statements of Mr Turcu and Mr Gashi, the appellant 7 also served for the purposes of the appeal three 8 statements about the gun which had featured in films 9 that had been taken covertly, including a statement from 10 Mr Turcu's old employer saying that one of its employees 11 had said the gun had been supplied by the employee to 12 Mr Gashi, but was not a real gun; it was a replica. 13 A. I've seen that, but what's the evidence that that was 14 the gun that was on the video? 15 Q. And there was a statement from the man who supplied the 16 gun to Mr Gashi confirming that and saying, having seen 17 the film, that he thought it was the same gun. 18 A. Mr Barr, these guys involved in the Beckham kidnap plot 19 were serious Eastern Bloc criminals, they were jailed 20 for other offences. These were serious villains. For 21 them to obtain a weapon was not a big deal. The 22 assertion that it had to be a gun supplied by Gashi, 23 that simply doesn't hold any water. 24 Q. You say it's an assertion that doesn't hold any water. 25 Do you have any personal knowledge of who supplied the</p> <p style="text-align: center;">Page 18</p>	<p>1 every single tape, scanned -- I mean, the police went 2 through all our tapes first of all, the CPS went through 3 all our tapes and all our evidence, the police were 4 satisfied with our evidence, the CPS was satisfied with 5 our evidence when they brought charges and 6 Mr Justice Eady was satisfied with the evidence. So, 7 you know, the only person now, after having turned 8 against me, Mr Gashi's making his allegations, he's the 9 only one that says that the evidence isn't up to 10 scratch. Everybody else seems to think it is. 11 Q. Wasn't the true position that in addition to whatever 12 concerns there might have been about legal costs, the 13 evidential landscape had changed dramatically by the 14 time that the appeal was compromised, and that there was 15 evidence from a number of witnesses which was adverse to 16 the News International case and which News International 17 was poorly placed to challenge? 18 A. I don't think that was the case and that's not how our 19 legal team presented it to me. Mr Gashi would be shown 20 to be discredited in seconds if he appeared in court. 21 I think in one court case -- he even turned up in 22 a court case to do with a story about red mercury where 23 he stood in the witness box and admitted that he'd lied, 24 made up a false allegation about me. When he was 25 challenged why he had lied, he said, "Look, I don't</p> <p style="text-align: center;">Page 20</p>

5 (Pages 17 to 20)

<p>1 know."</p> <p>2 So on the basis of Gashi, it's a bit unfair to</p> <p>3 criticise that story. In essence you're saying the</p> <p>4 police got it wrong, CPS got it wrong, Mr Justice Eady</p> <p>5 got it wrong but Gashi's right. That's essentially what</p> <p>6 you're saying to me.</p> <p>7 LORD JUSTICE LEVESON: I'm not concerned about the story in</p> <p>8 itself. That's part of, if you like, legal history.</p> <p>9 I'm concerned with the custom, practice and ethics of</p> <p>10 the press, and I'd like your help on this: Mr Gashi was</p> <p>11 your informant. He provided you, as I understand what</p> <p>12 you've said, with much useful information, which had led</p> <p>13 to investigations which you'd conducted.</p> <p>14 A. Correct.</p> <p>15 LORD JUSTICE LEVESON: And you'd relied upon him for the</p> <p>16 purpose of your work?</p> <p>17 A. Well, relied on him in that he provided tips. We would</p> <p>18 investigate each tip, independently gather evidence. We</p> <p>19 get tips from all kinds of people.</p> <p>20 LORD JUSTICE LEVESON: Yes, but in particular you'd relied</p> <p>21 upon him for tips and for information over some time?</p> <p>22 A. Correct.</p> <p>23 LORD JUSTICE LEVESON: Yes.</p> <p>24 A. And each tip that he presented we vetted thoroughly.</p> <p>25 LORD JUSTICE LEVESON: Just bear with me, please. I will</p> <p style="text-align: center;">Page 21</p>	<p>1 much one dismisses this man -- and I'm not here to</p> <p>2 support Mr Gashi at all -- a newspaper would be</p> <p>3 concerned to find itself in this position and would want</p> <p>4 to put into place measures to protect itself, not least</p> <p>5 because, quite right, you say Mr Justice Eady saw the</p> <p>6 tapes, but he only saw the tapes that he got, and the</p> <p>7 risk is that you are then put into a difficult position,</p> <p>8 and I'm sure you can't have been pleased to be</p> <p>9 interviewed by the police. That's itself a concerning</p> <p>10 position. So I'm just interested to know what your view</p> <p>11 is about the fact that nothing seems to have been</p> <p>12 discussed with you, nothing seems to have been put into</p> <p>13 place to ensure your position was protected.</p> <p>14 A. I don't quite follow what you mean by nothing was put in</p> <p>15 place. I mean, what do you mean should have been put in</p> <p>16 place?</p> <p>17 LORD JUSTICE LEVESON: I'm surprised that you weren't told</p> <p>18 immediately about this statement, not merely so that you</p> <p>19 could say it's rubbish, or whatever view you took about</p> <p>20 it --</p> <p>21 A. Sure.</p> <p>22 LORD JUSTICE LEVESON: -- but also so that you could think</p> <p>23 how you could protect yourself in the future if tipsters</p> <p>24 were going to do this to you.</p> <p>25 A. No, I'm sure it was mentioned. I cannot recall. It's</p> <p style="text-align: center;">Page 23</p>
<p>1 get there. However dishonest he might be, he was now</p> <p>2 saying, in a statement which was going to be put before</p> <p>3 the court, that you'd put him up to this particular</p> <p>4 story. That's what he was saying.</p> <p>5 A. Correct.</p> <p>6 LORD JUSTICE LEVESON: Are you telling me that nobody</p> <p>7 discussed that with you or warned you about it or told</p> <p>8 you about it at all? So that you had no knowledge of</p> <p>9 this?</p> <p>10 A. I can't recall that, but what I can recall is that he</p> <p>11 was also encouraged by Mr Greenslade to speak to police</p> <p>12 and I was called in and interviewed by police over</p> <p>13 a whole range of allegations that he'd made, and each of</p> <p>14 them were later proved to be false, so --</p> <p>15 LORD JUSTICE LEVESON: But --</p> <p>16 A. -- we knew that the man's a liar.</p> <p>17 LORD JUSTICE LEVESON: -- you misunderstand my point,</p> <p>18 Mr Mahmood. I am concerned to know whether your</p> <p>19 newspaper, who clearly knew about all this, they were</p> <p>20 seeing the papers, raised with you issues or put into</p> <p>21 train measures arising out of the fact that this man who</p> <p>22 provided you with tips was now alleging that you'd set</p> <p>23 him up to it. There was no such discussion with you?</p> <p>24 A. I can't recall. I can't recall a specific discussion.</p> <p>25 LORD JUSTICE LEVESON: Because one might think that however</p> <p style="text-align: center;">Page 22</p>	<p>1 the nature of my work that we are dealing with these</p> <p>2 kinds of criminals. You know, it's inevitable we have</p> <p>3 to deal with these unreliable people.</p> <p>4 LORD JUSTICE LEVESON: Could I express some concern,</p> <p>5 Mr Mahmood, that you can't recall what I would have</p> <p>6 thought, speaking for myself, would be quite an</p> <p>7 important discussion for your protection, which wasn't</p> <p>8 that long ago in history.</p> <p>9 A. I can certainly recall having a conversation with</p> <p>10 Tom Crone about allegations he'd made to the police.</p> <p>11 I can recall that.</p> <p>12 MR BARR: Mr Gashi --</p> <p>13 A. Mahmood.</p> <p>14 Q. Terribly sorry. Mr Mahmood, perhaps I could help you</p> <p>15 with that. Could you turn to tab 10 of the bundle.</p> <p>16 A. Right.</p> <p>17 Q. You should have there a statement of yours. Do you have</p> <p>18 it?</p> <p>19 A. Correct.</p> <p>20 Q. It was one of the exhibits to the statement that you</p> <p>21 filed late on Monday of this week. A statement of</p> <p>22 yours, it's made for the purposes of the appeal, you can</p> <p>23 see that from the heading?</p> <p>24 A. That's right.</p> <p>25 Q. And it says at paragraph 2:</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 "I have recently [it's dated 4 July 2006] read the 2 witness statement relied upon by the appellant given by 3 Florim Gashi dated 21 September 2005. The purpose of 4 this statement is to answer various allegations raised 5 by Mr Gashi in his statement. This is intended to be 6 a brief statement in response, and if this appeal 7 progresses any further, as the appellant wishes, then 8 I can produce a fuller statement in due course if 9 required." 10 Then your statement goes on to rebut the various 11 allegations in the main and to accept one or two of 12 them. 13 A. Well -- 14 Q. Having drawn your attention to that document, it's 15 right, isn't it, that your earlier evidence that you 16 knew nothing about this appeal until after it had been 17 settled -- 18 A. No, I didn't know that we'd -- 19 Q. -- must have been wrong? 20 A. No, it's not wrong. I didn't know that we'd settled. 21 I had no idea that we'd settled. Thanks for alerting me 22 to this. It clearly was discussed with me because I've 23 written a statement of response to the allegations that 24 you made so I think that answers that question but I was 25 certainly not aware that we'd settled and I still don't</p> <p style="text-align: center;">Page 25</p>	<p>1 I found no support for the proposition that he had made 2 the whole thing up.' 3 "He also said: 4 "There was clearly a plan to kidnap 5 Victoria Beckham, however desultory some of the 6 discussions may have been' and 'It is clear that real 7 crimes were regularly discussed ... There is no 8 reliable way to determine that the Beckham discussions 9 are to be distinguished from the others as not real." 10 Then you go to to say: 11 "I think this answers the criticisms that I had in 12 some way concocted the story, that there was no truth in 13 it, or that I had exaggerated it ..." 14 So it's plain, isn't it, that one of the reasons why 15 you included that quotation in your witness statement 16 was because you wanted to draw attention to 17 Mr Justice Eady's finding that there was clearly a plan 18 to kidnap Victoria Beckham? 19 A. That's right. As I said, it was under the subheading 20 "Fabrication". 21 Q. As well as -- 22 A. Absolutely, no, I agree. 23 Q. -- the additional allegation that you'd fabricated it? 24 A. Of course. 25 Q. If we look at paragraph 8 of your third statement --</p> <p style="text-align: center;">Page 27</p>
<p>1 know what the amount of the settlement was or what the 2 terms of the settlement were. 3 Q. I would like to know how it is that you're telling us on 4 Wednesday morning that you didn't know about the appeal 5 until after it had settled when -- 6 A. No, what I'm saying about the appeal -- 7 Q. -- your exhibit on Monday makes clear that you did. 8 A. As I said to you, I was unaware of the terms of the 9 settlement or they'd reached a settlement. I was told 10 about that afterwards. Clearly I was aware of the fact 11 there was an appeal. 12 LORD JUSTICE LEVESON: You appreciate that I'm not concerned 13 with the facts of the case, that's merely the 14 background. I'm concerned about a slightly different 15 point, about discussions arising out of the fact that 16 one of your tipsters had said all this very damaging 17 material or statements about you. 18 Anyway, I've understood what you have said. 19 MR BARR: Can we go back to paragraph 22 of your original 20 witness statement, Mr Mahmood, your second statement. 21 This may need to be brought to the screen again. It's 22 the paragraph we looked at a moment ago. I've read the 23 introductory sentence already. The quotation of 24 Mr Justice Eady says: 25 "Mr Mahmood may be hard bitten and cynical, but</p> <p style="text-align: center;">Page 26</p>	<p>1 A. Is that coming up? 2 Q. -- which says: 3 "I had also thought and still think that the fact of 4 the appeal and settlement did not change the effect of 5 the words in the judgment which I quoted in my second 6 statement. The words of Mr Justice Eady which I quoted 7 were about an additional point that had arisen in the 8 proceedings, which was an attack on my character, 9 suggesting that I knew that this story was false and 10 that I had picked on vulnerable asylum seekers." 11 The point is, Mr Mahmood, not only was the quote 12 relevant to the fabrication issue, the appeal was also 13 relevant to the question of whether or not there was 14 a plot at all, wasn't it? 15 A. Sure. 16 Q. And so this is really no excuse at all, is it, for not 17 mentioning the appeal more fully in your second witness 18 statement? 19 A. As I say, it's an oversight and it's an issue that 20 I would want aired because it's an issue that I'm 21 concerned about, how people like this can go to court 22 and walk away with money purely on economic grounds. 23 It's an issue that I'm concerned about. 24 Q. Can we move now to what you tell us about the PCC. You 25 tell us that there was an investigation by the PCC into</p> <p style="text-align: center;">Page 28</p>

<p>1 the payments which had been made by the News of the 2 World to Mr Gashi. 3 A. Correct, there was. 4 Q. It's right, isn't it, that the PCC found in the News of 5 the World's favour? 6 A. That's correct. 7 Q. And it did that because it interpreted the PCC code in 8 relation to payments to witnesses as only applying once 9 charges were laid? 10 A. Correct. 11 Q. And not in accordance with the wider meaning of legal 12 proceedings, which is applied in contempt of court 13 cases. 14 A. Right, okay. 15 Q. The third matter which I'd like to ask you about today, 16 Mr Mahmood, is your use of Florim Gashi after the 17 Beckham kidnap plot. 18 A. Right. 19 Q. It is right, isn't it, that you continued to use 20 Mr Gashi to provide you with tips for stories after the 21 Beckham plot? 22 A. That's correct. 23 Q. Even though he was regarded by the police as an 24 unreliable witness? 25 A. Most of the people I deal with would be regarded as</p> <p style="text-align: center;">Page 29</p>	<p>1 withdrew? 2 A. I can't recall that. I did ask our lawyers to try and 3 get a transcript of the case, but they've not been able 4 to do that in time, but I do recall being told by our 5 legal team that he'd stood up in court and admitted that 6 he'd lied and was not -- unable to explain why he'd 7 lied. 8 Q. You tell us that when you joined the Sunday Times last 9 year the editor asked you to confirm that you no longer 10 used Mr Gashi nor would you in the future use Mr Gashi 11 and you gave him that assurance? 12 A. Absolutely. This is a man who's made allegations 13 against me to the police, so it wouldn't even -- the 14 question doesn't even arise, really. 15 Q. Did -- 16 A. We fell out after he was deported so I've not spoken to 17 him or dealt with him since. In fact, he was ringing me 18 up threatening me from Albania. 19 Q. Did the Sunday Times require any other conditions on the 20 way in which you conducted your investigations when they 21 employed you last year? 22 A. No, they did not. 23 MR BARR: Thank you. Those were all my questions. 24 A. Thank you. 25 LORD JUSTICE LEVESON: Is there a risk that if you use an</p> <p style="text-align: center;">Page 31</p>
<p>1 unreliable witnesses. I've had front page splashes from 2 crack addicts. A story I did about a footballer's 3 father who was running a crack den in Nottingham, that 4 came from a crack addict who even stole my tape 5 recorder. We deal with unreliable people all the time 6 but it's information that's important, that we vet and 7 check thoroughly. So it can't be said that because 8 Gashi had been described as unreliable by police that we 9 thought he was unreliable. 10 Q. It does put at risk, though, doesn't it, the potential 11 integrity of your investigations if you're relying upon 12 a man whose credibility issues were as significant as 13 Mr Gashi's? 14 A. As I said, we get stories from crack addicts, 15 prostitutes, all kinds of sources. Our job is to test 16 the tip that they're providing, gather information, and 17 only if our lawyers are satisfied does it appear in the 18 paper. 19 Q. You tell us at paragraph 19 that Mr Gashi made 20 allegations about you in the red mercury trial and then 21 in the cricket match-fixing trial, a matter which you 22 touched upon a little earlier in your evidence. You 23 also say that in the red mercury trial, he admitted in 24 court that he had made false accusations about you and 25 withdrew them. Which allegations are you saying he</p> <p style="text-align: center;">Page 30</p>	<p>1 informant who you know to be unreliable as the basis to 2 start investigation, that you're then really embarking 3 upon what is little more than a fishing expedition? 4 A. No, it's not true at all. I mean, with Gashi, I mean at 5 the time all the information that he'd provided me was 6 accurate. I didn't regard him as an unreliable witness, 7 even after the Beckham case. I believed and still do 8 that the information he provided at the time was 9 correct. But the nature the work is, as I explained, 10 that you have to deal with people who are simply 11 unreliable, untrustworthy. You have to. 12 LORD JUSTICE LEVESON: I understand the point. And I also 13 understand your point about conditional fee agreements, 14 but its place in this discussion we will have to think 15 about. 16 All right, thank you very much. I will rise. 17 (10.52 am) 18 (A short break) 19 (11.00 am) 20 MR JAY: The next witness is Mr Robert Crow, please. 21 LORD JUSTICE LEVESON: Can I confirm that the audio and 22 visual are back on? Thank you. 23 MR ROBERT CROW (affirmed) 24 Questions by MR JAY 25 MR JAY: Kindly sit down and make yourself comfortable and</p> <p style="text-align: center;">Page 32</p>



<p>1 provide us with your full name.</p> <p>2 A. Robert Crow.</p> <p>3 Q. Thank you very much. You've provided us with a witness</p> <p>4 statement which you've signed and dated 14 December of</p> <p>5 last year, and in respect of which there is a statement</p> <p>6 of truth. Subject to one typographical correction in</p> <p>7 paragraph 8, is this your true evidence, Mr Crow?</p> <p>8 A. Yes.</p> <p>9 Q. The correction is substituting "Whittamore" for</p> <p>10 "Whittaker", do you see that?</p> <p>11 A. Yes, that's true.</p> <p>12 Q. You, of course, are General Secretary of the National</p> <p>13 Union of Rail, Maritime and Transport Workers, and have</p> <p>14 been since 2002; is that correct?</p> <p>15 A. That's true.</p> <p>16 Q. Can I ask you, please, about paragraphs 3 and 4 of your</p> <p>17 statement, where you deal with surveillance instigated</p> <p>18 by News International and carried out by Mr Derek Webb.</p> <p>19 There's a letter from Linklaters which was sent to your</p> <p>20 solicitors on 20 January of this year, which indicates</p> <p>21 that Mr Webb was carrying out covert surveillance of</p> <p>22 you, and I can give the dates: between 26 October and</p> <p>23 30 October 2010, 8 November and 13 November 2010, 12 and</p> <p>24 17 December 2010 and then again, perhaps most materially</p> <p>25 in relation to evidence you're about to give us, between</p> <p style="text-align: center;">Page 33</p>	<p>1 the main, because we operate within the public transport</p> <p>2 systems, it causes strife. It also causes people to</p> <p>3 change their travel plans and so on, and we expect that</p> <p>4 people would be unhappy about travelling -- having their</p> <p>5 plans disrupted and so on.</p> <p>6 The way I see it it's quite right for a newspaper or</p> <p>7 a media entity to basically argue that it's wrong what</p> <p>8 we're doing, that we shouldn't be striking, we wouldn't</p> <p>9 differ with that, but the same time goes the boundary,</p> <p>10 as I see it, is where they take it into personalities of</p> <p>11 individuals and infringe upon their families and also</p> <p>12 other members or officials and staff of our</p> <p>13 organisation. All they're purely trying to do is make</p> <p>14 life better for working men and working women.</p> <p>15 LORD JUSTICE LEVESON: Could you go a little bit slower,</p> <p>16 Mr Crow, because it's all being written down.</p> <p>17 A. Okay, sir.</p> <p>18 LORD JUSTICE LEVESON: And I want to make sure that it's all</p> <p>19 caught.</p> <p>20 A. No problem, sir. Do you want me to say it again?</p> <p>21 LORD JUSTICE LEVESON: No, no.</p> <p>22 MR JAY: We'll see how this plays out in the individual</p> <p>23 examples you give in your statement. Can I deal first</p> <p>24 with the article in the Mail on Sunday, which was</p> <p>25 published on 2 February 2003.</p> <p style="text-align: center;">Page 35</p>
<p>1 11 and 14 January 2011. Is that right?</p> <p>2 A. That's correct.</p> <p>3 Q. You don't know, however, why News International were</p> <p>4 carrying out surveillance into you, but you can surmise;</p> <p>5 is that right?</p> <p>6 A. Yes.</p> <p>7 Q. Can I deal, please, with paragraph 5 of your statement?</p> <p>8 You rightly say that as a public figure, as the General</p> <p>9 Secretary of a union, you can expect a certain amount of</p> <p>10 negative publicity. In general terms, where do you see</p> <p>11 the boundaries between that which is intrusive and</p> <p>12 therefore impermissible and that which may be</p> <p>13 permissible?</p> <p>14 A. We run a democratic organisation. Our job is to secure</p> <p>15 the most safest possible workplace for our members, both</p> <p>16 rail, road, sea and bus. Our job at the end of the day</p> <p>17 in my view is to make sure that when our members turn up</p> <p>18 for work, they go home unharmed, uninjured and in one</p> <p>19 piece. Also our job is to secure the best possible</p> <p>20 terms and conditions for our members and in the wider</p> <p>21 field to get the best possible welfare and social</p> <p>22 reasons for our members to be about in society. That's</p> <p>23 our job.</p> <p>24 The boundaries as I see it is that number one, if my</p> <p>25 union for a democratic ballot called strike action, in</p> <p style="text-align: center;">Page 34</p>	<p>1 We have that article at page 54982. Do you have</p> <p>2 that in front of you? It may be on that screen,</p> <p>3 Mr Crow. Coming up?</p> <p>4 A. No, I'm not looking at the article in front of me.</p> <p>5 LORD JUSTICE LEVESON: Is it at the back of your statement?</p> <p>6 A. No, unfortunately it's not.</p> <p>7 LORD JUSTICE LEVESON: Look, you'd better have mine.</p> <p>8 A. Thank you, sir.</p> <p>9 MR JAY: There are a number of points about this. Can we</p> <p>10 just provide the context, Mr Crow? The Central Line had</p> <p>11 broken down for two weeks because there was a derailment</p> <p>12 at Charing Cross so it was shut, so --</p> <p>13 A. Not at Charing Cross, Chancery Lane.</p> <p>14 Q. Pardon me. So you had to get to work by one means or</p> <p>15 another. You live in north-east London, I understand;</p> <p>16 is that right?</p> <p>17 A. That's right.</p> <p>18 Q. Which is, is this right, seven miles from your place of</p> <p>19 work?</p> <p>20 A. I've never measured it, sir.</p> <p>21 Q. So you either -- well, there are various other means,</p> <p>22 but you chose, on my understanding, on a number of</p> <p>23 occasions to take a lift on your personal assistant's</p> <p>24 scooter?</p> <p>25 A. That's right.</p> <p style="text-align: center;">Page 36</p>

<p>1 Q. We see a picture of you, it's not very clear, on the                  2 back of your personal assistant Mr Scott's scooter. We                  3 can't see the registration mark of the scooter, but we                  4 know there is one, and this is relevant to evidence                  5 you're about to give, and there's a certain commentary                  6 and/or discussion on the significance of all of this.                  7 A. Yes. The picture is taken from outside my home. The                  8 scooter is in reverse, with the individual personal                  9 secretary coming, reversed his scooter. He's picked me                  10 up, I'm waving at my young daughter upstairs in the                  11 bedroom, and I set off to go to King's Cross station to                  12 attend the meeting in Newcastle about the regional                  13 council.                  14 Q. Yes. There is an important issue as to how the Mail on                  15 Sunday obtained information in relation to Mr Scott,                  16 which I am going to turn to, but setting that issue to                  17 one side, what objection, if any, do you have to this                  18 piece in the Mail on Sunday?                  19 A. Number one, obviously the person taking the picture is                  20 hiding away somewhere, which is not really a big issue                  21 as far as I'm concerned. He's taking a picture of                  22 a member of staff of our organisation. He's not an                  23 official of the union, he's purely a member of staff who                  24 decided to help out. This weren't in a strike, which                  25 some people could use the argument it was down to the                  Page 37</p>	<p>1 how they obtained the information.                  2 MR JAY: You deal with that in paragraph 8 of your                  3 statement. This is part of Operation Glade, which was                  4 Metropolitan Police investigation following the raid on                  5 Mr Whittamore's premises.                  6 A. Yes.                  7 Q. Which, if my memory is right, was 8 March 2003. Can you                  8 tell me, please, what your involvement is or was in                  9 relation to that, or more particularly, the involvement                  10 of Mr Scott, your personal assistant?                  11 A. Yes. My personal assistant, who has been my personal                  12 assistant for ten years, and the previous General                  13 Secretary Jimmy Knapp's assistant for some eight years,                  14 he's been a member of our union with unblemished record,                  15 at home one afternoon, early evening, when there was                  16 a knock on the door and it was two police officers from                  17 the corruption unit, who asked him did his scooter break                  18 down in the Wandsworth area of London? And he                  19 categorically remembered that he'd never ever been to                  20 Wandsworth with his scooter and he said "Your scooter                  21 broke down in Wandsworth". He said, "No, it never broke                  22 down in Wandsworth". He said all we can say is someone                  23 phoned up at this moment in time the DVLA in Swansea on                  24 a particular date, which he gave to Mr Scott, and said                  25 that your motorbike, your scooter's broken down and he                  Page 39</p>
<p>1 RMT which caused the disruption on the Central Line,                  2 this was over a massive signal failure that took place                  3 over some eight, nine, ten years ago, and an individual                  4 concerned helped me out. I don't drive a car myself and                  5 the only way for me to get to work is bus, which I did                  6 on a number of occasions. On this occasion I had to be                  7 on time to catch a train to Newcastle so he picked me up                  8 by scooter, which he'd done on a number of occasions,                  9 and took me home by scooter on a number of occasions.                  10 Q. It might be said, Mr Crow, that the story is entirely                  11 vacuous in the sense that you have to get to work, you                  12 take a scooter of your personal assistant's, so what?                  13 But on the other hand it might be said, well, is there                  14 a problem publishing this sort of vacuity? How do you                  15 see it?                  16 A. Number one, if you stayed at home you would say that                  17 I get around the strikes by staying indoors. If I                  18 pedalled to work it would be pedal power. If you went                  19 by bus, it would be I'd moved into the bus industry                  20 rather than the rail industry. The issue is a non story                  21 as far as I'm concerned. It's about how do you get to                  22 work.                  23 LORD JUSTICE LEVESON: That's what Mr Jay is saying. It may                  24 very well be a non story.                  25 A. Yes. The issue to us is not about the non story, it's                  Page 38</p>	<p>1 wanted to know who the owner was. Or he found                  2 a scooter, who was the owner of the scooter.                  3 Obviously that information that they got from DVLA                  4 was then supplied to Mr Whittamore, who then supplied it                  5 to the Daily Mail or Sunday Mail who produced the                  6 article and no action was taken by the police against                  7 the newspapers as a result of obtaining corrupt                  8 information.                  9 Q. Yes. This ties in with Operation Glade, that someone                  10 blagged information --                  11 A. Yes.                  12 Q. -- from DVLA, transmitted that information to                  13 Mr Whittamore --                  14 A. Yes.                  15 Q. -- and then evidently that information was passed on to                  16 the Mail on Sunday?                  17 A. Yes.                  18 Q. Does that --                  19 A. That's the scooter and the motorbike -- the scooter                  20 concerned with the glazed out registration numbers                  21 concerned.                  22 Q. So the information which was made available to DVLA was                  23 the registration mark of Mr Scott's scooter?                  24 A. Yes.                  25 Q. But the request was who was driving the motorcycle and                  Page 40</p>

<p>1 the answer came back Mr Scott?</p> <p>2 A. Yeah. Putting two and two together, they obviously had</p> <p>3 the picture, they had the person who picked me up, it</p> <p>4 may have been someone, a member of the public who had</p> <p>5 seen me on the back of a scooter going to work but they</p> <p>6 didn't know who the individual was, and the only way</p> <p>7 they could obtain that information was by blagging the</p> <p>8 DVLA to find out Mr Scott's registration number by</p> <p>9 making out that the scooter had been either lost or</p> <p>10 broken down in Wandsworth, which he'd never been.</p> <p>11 Q. I understand. Did Mr Scott provide a witness statement</p> <p>12 to the police --</p> <p>13 A. Yes, he did.</p> <p>14 Q. -- in relation to this?</p> <p>15 A. Yes.</p> <p>16 Q. We know what happened to Operation Glade, that it</p> <p>17 culminated in a hearing at Blackfriars Crown Court on</p> <p>18 19 April 2005 and conditional discharges were imposed by</p> <p>19 the courts, so Mr Scott never gave evidence, presumably?</p> <p>20 A. He wasn't called. He was prepared to give evidence and</p> <p>21 we also complained to the Information Commissioner as</p> <p>22 well.</p> <p>23 Q. Can I just ask you, please, because I've been asked to</p> <p>24 put this to you, in relation to the fourth line from the</p> <p>25 end of paragraph 8, if I can invite that to your</p> <p style="text-align: center;">Page 41</p>	<p>1 that week, that at that particular time, at that</p> <p>2 particular hour of the day, that someone was there with</p> <p>3 a camera to take a picture.</p> <p>4 LORD JUSTICE LEVESON: One possibility, and I'm not trying</p> <p>5 to resolve it, is that someone had seen you go in on the</p> <p>6 scooter before, found out the home of the scooter and</p> <p>7 hoped that they'd catch you?</p> <p>8 A. That may be the case, and I'm sort of no detective to</p> <p>9 find that out, but it would be very strange that someone</p> <p>10 on a scooter would actually find a scooter in Hackney,</p> <p>11 out of all the places in London, to find out where its</p> <p>12 premises were.</p> <p>13 LORD JUSTICE LEVESON: No, I understand the point, but once</p> <p>14 they know its home, somebody could just wait and see.</p> <p>15 I don't know, we just have to find out, but the --</p> <p>16 A. Either way, why would they ring the DVLA up and ask for</p> <p>17 information?</p> <p>18 LORD JUSTICE LEVESON: That's a different question.</p> <p>19 MR JAY: Because they want to find out Mr Scott's</p> <p>20 identity --</p> <p>21 A. And his home address.</p> <p>22 LORD JUSTICE LEVESON: That's the point.</p> <p>23 MR JAY: That's the point.</p> <p>24 LORD JUSTICE LEVESON: Yes.</p> <p>25 MR JAY: There's that extra point, that it's not just</p> <p style="text-align: center;">Page 43</p>
<p>1 attention, Mr Crow?</p> <p>2 A. Yes.</p> <p>3 Q. The point is fully understood in relation to DVLA and</p> <p>4 blagging. You're possibly suggesting there that the</p> <p>5 fact that it was ascertained that Mr Scott would be</p> <p>6 picking you up on a particular day might have been</p> <p>7 obtained by hacking into either your phone or Mr Scott's</p> <p>8 phone, do you follow me?</p> <p>9 A. That's correct, yes.</p> <p>10 Q. It's been suggested to me that you have no evidence for</p> <p>11 that, that's just guesswork on your part. Is that fair</p> <p>12 or not?</p> <p>13 A. Yes. We've asked the police to see if there was proof</p> <p>14 that our phones had been hacked. They said that it's</p> <p>15 still under investigation under Operation Weeting at</p> <p>16 this moment in time. It's just strange that this</p> <p>17 particular day I was picked up by my personal</p> <p>18 secretary -- because he never picked me up every day,</p> <p>19 I used to get the 275 bus to Walthamstow and get the</p> <p>20 Victoria Line in.</p> <p>21 On this particular day I had to be at King's Cross</p> <p>22 for a train to Newcastle and the weather weren't</p> <p>23 particularly good. He wanted to make sure and I wanted</p> <p>24 to make sure that I got the train on time. So it's</p> <p>25 strange that this particular day, there was no other day</p> <p style="text-align: center;">Page 42</p>	<p>1 Mr Scott's identity, but his home address --</p> <p>2 A. That's right.</p> <p>3 Q. -- which might enable them to tail him from his home</p> <p>4 address to your home address. That may be part of the</p> <p>5 picture. Thank you, Mr Crow.</p> <p>6 The next example you would like to draw to the</p> <p>7 Inquiry's attention, paragraph 9 of your statement,</p> <p>8 13 June 2009. This is when the Sun obstructed you on</p> <p>9 your way to work. Can you talk us through that one?</p> <p>10 A. Yes.</p> <p>11 Q. We have some photographs which show the Sun bus.</p> <p>12 A. Yes.</p> <p>13 Q. And also a photograph which shows you being arguably</p> <p>14 obstructed by two men. First of all, while we're on the</p> <p>15 Sun bus, could you tell us, please, where that bus was</p> <p>16 in relation to your house?</p> <p>17 A. Well, that actual picture where that Sun bus is there in</p> <p>18 the picture is outside Woodford station on the Central</p> <p>19 Line. What they actually did was that we had a strike</p> <p>20 which was on -- previous to 13 June on the days leading</p> <p>21 up, I think it was on the Tuesday and Wednesday of the</p> <p>22 match, and there had been a match being played at</p> <p>23 Wembley that particular week, and I left me house in the</p> <p>24 morning and as I walked just out of the house, the Sun</p> <p>25 bus, that Sun bus was parked at the end of my road,</p> <p style="text-align: center;">Page 44</p>

<p>1 which is only six doors long, and seven men were 2 standing there, two with cameras, two people, I don't 3 know who they were, just looked like, if you don't mind 4 me saying, yourself, like a solicitor or barrister 5 standing there, very smart, and a person with the Sun 6 microphone in his hand.</p> <p>7 Q. Right.</p> <p>8 A. He walked straight up to me and stood on me feet and his 9 words were, "What's it like then not getting to work?" 10 You stopped people getting to work this week, how about 11 a taste of your own medicine?" with someone taking 12 pictures who I found out to be a Mr Lee Thompson, 13 I found out through his blog, who makes it clear by 14 selling his work to newspapers that on his CV how happy 15 he was that he stopped me leaving my home that day to go 16 to work.</p> <p>17 I said to the person concerned, I was very cool -- 18 this what they really wanted me was to hit out and take 19 a picture of me hitting a journalist and you wouldn't 20 have done anything about the Sun bus, it would just be 21 a picture of me hitting a journalist because they asked 22 a nice and delicate question about the strike.</p> <p>23 I kept very cool and told him to get off my feet and 24 I wanted to go to work and they proceeded with the bus 25 right up Snakes Lane East, which goes from my road</p> <p style="text-align: center;">Page 45</p>	<p>1 a situation of intimidation and hit out because it's not 2 my style. I phoned the police and the police come and 3 they told the people to move out the way and stop 4 obstructing me going to work.</p> <p>5 I have to say, just on another note, that if we have 6 a strike and if we dare stop people going to work, the 7 police would have come and arrested us straight away for 8 obstruction and intimidation, but they was allowed to 9 get away with it.</p> <p>10 They made a video the next day, which was something 11 like <a href="http://www.stopbocrowgettingtowork.com">www.stopbocrowgettingtowork.com</a>. You could see 12 the video of me walking up the road and also put in 13 their editorial that I was a coward because I phoned the 14 police. I don't know what else I should have to do. 15 I suppose if I hit them I'm a thug and if I call the 16 police I'm a coward.</p> <p>17 That's the police turning up and asking what the 18 situation was. I actually got my mobile phone out and 19 took a video of them and the police actually told me to 20 put my video away.</p> <p>21 Q. Thank you. That's very clear, Mr Crow, on that point. 22 There's another example. We're moving forward in 23 time to January of last year, Mr Crow, when you take 24 a holiday along with your partner and two friends. This 25 is in the Caribbean, I believe. Can I just have from</p> <p style="text-align: center;">Page 47</p>
<p>1 towards the station, shouting out at every single person 2 walking up the road, like I was going to the stocks, 3 "This man has stopped all your trains this week, what do 4 you think?" all the way up, shouting into the baker's 5 shop, shouted into the local chemist, shouted into the 6 launderette: come out and basically, you know, pillar 7 this man on his way to the station.</p> <p>8 When I got to the station, he still stood in me way 9 and said I weren't allowed to go to work.</p> <p>10 Q. We have a --</p> <p>11 A. Video.</p> <p>12 Q. -- photograph of that. We won't be able to use the 13 video I'm afraid but there's a photograph of two men -- 14 there we are.</p> <p>15 A. Yes.</p> <p>16 Q. What's that showing, Mr Crow?</p> <p>17 A. That's -- behind me is the bus parked up. They're two 18 of the people that was smartly dressed. There was 19 another person as well that was smartly dressed. There 20 was two people with television cameras, either side of 21 me face, pointing to me face. The bus driver, who was 22 a big lad as well, and they're saying to me now that 23 I can't go through to the station to go to work, and 24 they stood there. At that point I had to say, well, you 25 know, what do I do? I weren't going to get into</p> <p style="text-align: center;">Page 46</p>	<p>1 you please the date the holiday began, because this is 2 relevant to --</p> <p>3 A. 13 January.</p> <p>4 Q. And the letter from Linklaters makes it clear that you 5 were under surveillance from Mr Webb from 11 to 6 14 January, which may or may not be relevant to this.</p> <p>7 So your holiday begins on 13 January. Is that the 8 day you fly out to the Caribbean --</p> <p>9 A. No, I day I fly out.</p> <p>10 Q. Do you arrive on the 14th?</p> <p>11 A. No, the 13th.</p> <p>12 Q. We can see the article at 54983. It's dated 23 January. 13 It's in the News of the World and it's by the chief 14 reporter, Mr Neville Thurlbeck. Do you have that?</p> <p>15 A. Yes I do.</p> <p>16 Q. Before I ask you questions about the article itself, can 17 you tell us, please, the circumstances in which the 18 information and photographs which we see in the article 19 might have been obtained?</p> <p>20 A. Yes. On 14 January, our first port of call was the 21 lovely island of Grenada. Myself and three other 22 colleagues with me who was leaving the ship, you hand 23 your passport in when you go onto the ship and they give 24 you a card, like a credit card, which is the same as 25 a passport, for leaving the ship and going off the ship.</p> <p style="text-align: center;">Page 48</p>

12 (Pages 45 to 48)

<p>1 It was purely by chance as we're walking up the gangway                  2 to get off the ship, the security officer that takes                  3 your card and checks you in that you're off the ship or                  4 on the ship was talking to a man in uniform, ship                  5 uniform, same like the uniform that he had on. He had                  6 a piece of paper in his hand that he was asking, "Is                  7 Robert Crow on the ship?" and I was taken aback.                  8 I first of all thought they were going to throw a party                  9 for me if I was on there. I was taken aback and                  10 I didn't want to say there and then I was on the ship to                  11 the person because he'd have known I'd been there.                  12 So the person walked down the gangway and I said to                  13 the security officer, "Why you are giving information?"                  14 He said "That's okay, that's Mr Matthews, he does work                  15 for Thomson Ships, he takes people for trips and one                  16 thing and the other and he shows people shops and                  17 jewellery and things like that". I said "Why would he                  18 be asking for information?" He said "Perhaps you've                  19 booked a trip". I said "No, I've booked nothing".                  20 We followed where his footsteps were and said to the                  21 person at the port, "Did you see Mr Matthews go                  22 through?" He said "Oh yes, he's gone into the                  23 supermarket". We went into the supermarket, four of us,                  24 and confronted him and he said he was just down at the                  25 port side, about half a mile from the ship, and a person                  Page 49</p>	<p>1 Q. So these are photographs taken with a long lens, and                  2 it's pretty clear looking at the photos that you were                  3 unaware that they were being taken?                  4 A. That's right.                  5 Q. And you're on holiday on the island of Aruba and you say                  6 this is intrusive?                  7 A. Yes.                  8 Q. Your partner's name is mentioned. It also says that                  9 she's out shopping.                  10 A. Yes.                  11 Q. Which again is -- what do you say about that?                  12 A. She was out shopping, she wasn't, actually, but that's                  13 what you do when you go on holiday.                  14 Q. But to ask you the point directly: is there any public                  15 interest, in your view, in publishing that sort of                  16 information about your partner?                  17 A. No, not at all. I really can't see what the actual --                  18 you can see what the story's about, it's just to                  19 humiliate you, basically saying you shouldn't be going                  20 on holiday and shouldn't be going shopping and shouldn't                  21 be having a private life in general. How dare you have                  22 a holiday.                  23 Q. Did you, out of interest, complain to the PCC about this                  24 article?                  25 A. I'm not certain, no, if we actually complained to the                  Page 51</p>
<p>1 come up to him and said, "Oh, can you do us a favour                  2 mate, would you go down to the ship and see if Mr Crow                  3 is on there because we're throwing a surprise party for                  4 him". He said "Of course I will", and he walked half                  5 a mile, which I thought was very strange, why you would                  6 want to walk back half a mile just because someone asked                  7 you if I was on the ship or not.                  8 Then we confronted the person concerned and he said                  9 that he'd just done it to help this person out, he                  10 thought he was being helpful.                  11 We have a subsequent claim going in at this moment                  12 in time that someone has given information out and we                  13 believe that the person concerned was obtaining                  14 information.                  15 The picture concerned -- I can't really see his name                  16 on there, but the side of the newspaper article is --                  17 Q. Chris Bott.                  18 A. If you go to Google search, he operates as a private                  19 investigator/photographer operating from Florida in USA.                  20 Q. Okay.                  21 A. The actual picture concerned was about three or four                  22 days into the vacation on the island of Aruba, where                  23 they followed me and my partner, taking pictures,                  24 obviously to humiliate me and completely to be                  25 intrusive.                  Page 50</p>	<p>1 PCC. We may well have done. We've certainly got a case                  2 against Thomsons at the moment, Cruises, on the basis                  3 that we believe a member of their staff divulged                  4 information, confidential information, on a client's                  5 integrity, and also that that information shouldn't be                  6 provided because it should be secured with the company                  7 you book your holiday up with. The information                  8 shouldn't be given out.                  9 Q. Do you have any evidence that this might be linked to                  10 Mr Webb, apart from the coincidence of --                  11 A. No, I have no evidence, no.                  12 Q. Can I ask you about the next example, I think it's the                  13 final one, paragraph 11, Mr Crow. This is the union AGM                  14 held in June of last year at the Nevis Centre. Where is                  15 that?                  16 A. Fort William, underneath the Ben Nevis mountain.                  17 Q. Can you tell us about that?                  18 A. We had our annual general meeting each year. The                  19 caretaker of the Nevis Centre, which is a municipal                  20 centre, where we hold our conference, said he was                  21 getting phone calls throughout the week leading up to                  22 the AGM asking questions about did we have a hospitality                  23 room and what kind of facilities that we was given and                  24 so on. And he just batted them back in the normal way                  25 that it was none of his business and he's got a business                  Page 52</p>

<p>1 booking with the National Union of Rail, Maritime and 2 Transport Workers in holding our conference. 3 Then a person who at that time said he was working 4 as a freelance working out of Inverness for the 5 Sunday Times tried to obtain a copy of our annual 6 general meeting agenda, which was private and for 7 members only, and again the caretaker said "It's out of 8 my remit, you need to go and speak to the trade union if 9 they want to give you a copy". 10 Our press officer received a number of copies -- 11 phone calls, where he told them it's a private matter, 12 the annual general meeting, for our members and members 13 only. 14 What took place then was the caretaker of the Ben 15 Nevis Centre does his closed circuit TV watch every so 16 often and he went onto his closed circuit TV watch and 17 found that the individual journalist who said that he 18 was working as a freelancer for the Sunday Times was 19 going down bins trying to obtain information. We 20 reported that to the police. The police have done 21 nothing on the issue and we're taking the complaint out 22 against the police. 23 Earlier on in this Inquiry I heard an editor or 24 a deputy editor say that they don't go on fishing trips, 25 that newspaper. They might not go on fishing trips, but</p> <p style="text-align: center;">Page 53</p>	<p>1 "In my opinion, the details of our holiday, which 2 was a Caribbean cruise, could only have come from either 3 hacking phones or buying information from the tour 4 operator." 5 The gist of your evidence was far more, indeed 6 solely related to the second point, information obtained 7 from the tour operator. Do you have any evidence that 8 the information was obtained from hacking phones? 9 A. No, not directly. Only to say that we believe there was 10 hacking going on, our movements were -- only could have 11 been known in that sense of the word by where we'd have 12 been at a port of call at that time and so on. No 13 direct evidence, sir, on what the information is, but 14 certainly Mr Matthews -- and went to the head of 15 security as well -- he clearly went there to give 16 information to the person that took the photographs in 17 our view or the person in the port and the story 18 actually ends up in the News of the World. 19 Q. But from the picture you're giving us, it sounds more as 20 if all the information is collated by old-fashioned 21 surveillance techniques and a bit of dishonesty, namely 22 Mr Matthews obtaining information and possibly Mr Bott 23 obtaining information and possibly, and I understand 24 this to be your case, Thomsons providing information, 25 but those are the more likely sources of information</p> <p style="text-align: center;">Page 55</p>
<p>1 they certainly go on refuse trips up there because the 2 man had his head in the bin like the character Top Cat, 3 to be honest with you, and quite clearly that 4 information was tried to be obtained in our view 5 illegally to use against and slur the RMT. 6 Q. Can I just understand the strength of the evidence, 7 which relates the information coming from a bin, as you 8 say, rather than being, for example, the agenda 9 accidentally left in the Nevis Centre, and then being 10 picked up and handed to the Sunday Times? 11 A. Whether he went into the centre and got a copy or 12 whether he got a copy from someone else, I don't know, 13 but the fact is that we've still got the CCTV and the 14 person don't just go into the bins, he takes the bin 15 bags away with him and puts them in his car. There's 16 cutbacks going on at the moment, I know, with the local 17 authorities; I never thought journalists would go around 18 and help out the bin men, to be honest with you. 19 Q. Okay, thank you. I think that's all your evidence on 20 that point. 21 There's a point I missed, I'm afraid, in relation to 22 the holiday. I've been asked to put this to you. Look 23 at paragraph 10 of your statement. 24 A. Yes. 25 Q. The penultimate sentence reads:</p> <p style="text-align: center;">Page 54</p>	<p>1 rather than hacking of phones, would you accept that? 2 A. I can't prove, you know, if it was done by phone hacking 3 or it was Mr Matthews or it was someone else. All 4 I know is it ends up in the story of Mr Thurlbeck. 5 LORD JUSTICE LEVESON: If you're being watched, of course 6 you could have been watched going on board ship. 7 A. Yes. 8 LORD JUSTICE LEVESON: Or getting to the place from which 9 you were embarking on your cruise. 10 A. That's correct, sir. 11 LORD JUSTICE LEVESON: Whatever. But do I gather your 12 substantial complaint in relation to this incident is 13 the intrusion into your holiday? 14 A. Yes. 15 MR JAY: That's very clear, Mr Crow. 16 Are there any other examples which you want to draw 17 to our attention? 18 A. Very briefly. Basically on the illegal activity which 19 I believe happened to me by parking a bus outside the 20 home of the road where I lived. I'd like to also say 21 that we've already settled with Sun newspaper a libel 22 case where I was accused of having a union car -- which 23 I don't even drive, haven't got a licence -- and a union 24 sponsored house, which the union pays no contribution at 25 all to where I live. That was settled, got into the Sun</p> <p style="text-align: center;">Page 56</p>

14 (Pages 53 to 56)

<p>1 newspaper, and there was later a correction, apology, 2 and a court settlement done on that one. 3 Secondly as well, on top of that, back in 2003 in an 4 election for our national president, a person standing 5 election put mistruths out in his election address and 6 I subsequently put a letter out making it clear that it 7 was mistruths. I was accused by the Times newspaper of 8 breaking the law -- in their words, not mine -- and 9 subsequently the certification officer ruled that 10 I never broke the law and the Times newspaper settled 11 with me with a decision which demonstrated the fact 12 I never broke the law. 13 Just finally, this Christmas just gone, Boxing Day, 14 to give you an example, there was a strike on Boxing Day 15 this year caused by another union that operates, called 16 ASLEF. Nothing to do with the RMT whatever. And the 17 Times newspaper said that I and my union called that 18 strike, which caused massive disruption to the 19 travelling public, whether it be going to seeing their 20 loved ones over Christmas or whether it be going to see 21 sporting activities and so on, and they've put 22 a correction in, not an apology, on page 67, just saying 23 that it wasn't the RMT that called it, it was ASLEF. 24 Independent newspaper even went further and said I was 25 the Christmas glitch that that's caused all this</p> <p style="text-align: center;">Page 57</p>	<p>1 accredited press card. 2 A. Correct. 3 Q. You started your blog Jack of Kent in 2007. Your 4 objective is to provide a liberal and critical 5 perspective on legal and policy matters. You aim to be 6 nonpartisan and not to descend to gossip. You say that 7 almost all of your sources are stated and often quoted 8 in full or linked to. Could I ask you, please, how many 9 hits do you get on your blog on average? 10 A. I actually don't know. Last time I looked at the -- 11 what are called the stats for my blog, I think it was 12 between about 1,000 and 2,000 hits a day, and the New 13 Statesman stats I think are higher than that as well. 14 Q. Thank you. You tell us that when you blog, you comply 15 with the general law of the land, and you believe that 16 you blog ethically and responsibly. Perhaps I could ask 17 you to develop what you mean by "ethically and 18 responsibly". In your view, what does that entail? 19 A. Well, the starting position is that you just think 20 through why you are publishing this, what is the purpose 21 in why you are publishing whatever you are publishing? 22 If it seems to serve a good purpose, then I think is 23 there any reason for me not to publish this? For 24 example, can I source it or not? If I can't source it, 25 why am I making the claim? Is this something which is</p> <p style="text-align: center;">Page 59</p>
<p>1 disruption and have not even apologised. 2 So our trade union over the last 10 to 12 years has 3 been the victim of a campaign of victimisation, 4 harassment against not only me but officials of my union 5 and staff of my union for doing one thing and one thing 6 only, and that's standing up for good honest working men 7 and working women. 8 MR JAY: Thank you very much, Mr Crow. 9 LORD JUSTICE LEVESON: Thank you. 10 A. Thank you, sir. 11 MR BARR: Sir, the next witness is David Allen Green. 12 MR DAVID ALLEN GREEN (affirmed) 13 Questions by MR BARR 14 MR BARR: Mr Green, I won't ask you your full name because 15 you've just given it, but could I ask you to start with: 16 are the contents of your witness statement true and 17 correct to the best of your knowledge and belief? 18 A. Yes. 19 Q. You tell us that you are the person who writes the Jack 20 of Kent blog. You're the legal correspondent for the 21 New Statesman and the media correspondent for The 22 Lawyer. You're also a practising lawyer and 23 a journalist. You were called to the bar in 1999 and 24 cross-qualified as a solicitor in 2001. You're a member 25 of the National Union of Journalists and you hold an</p> <p style="text-align: center;">Page 58</p>	<p>1 appropriate for me to write about? Am I doing this for 2 the wrong motive altogether? 3 And there are times where I just don't run something 4 or write about something just because it doesn't -- 5 first of all, it wouldn't seem interesting to write or 6 it probably wouldn't be of any interest to the people 7 who read my blog. I've developed a very good 8 relationship with the people who comment on my blog and 9 I would be wasting their time. 10 So if it's not really that consequential or worth a 11 blog, I may say something on Twitter. I try and make 12 Jack of Kent a nonpartisan blog. I am a supporter of 13 the Liberal Democrats but I don't write a party 14 political blog at all. I use Twitter for more 15 inconsequential statements, but for blogging I do put a 16 lot of thought into why am I actually publishing this to 17 the world? 18 Q. That approach has plainly been successful because you 19 tell us that in over four years of writing about 20 sensitive and controversial subjects you have never had 21 a significant complaint or a credible threat. 22 A. Mm-hm. 23 Q. Completely accepting that you're an entirely responsible 24 blogger, I would like to ask you about the potential for 25 bloggers to act irresponsibly, and for your views on how</p> <p style="text-align: center;">Page 60</p>

1 the blogosphere is best regulated.  
 2 A. You can't look at blogging in isolation. Almost all the  
 3 examples one can come up with are where you would say  
 4 there has been irresponsible blogging or irresponsible  
 5 use of social media. Often the information involved has  
 6 come from somewhere else. So for example when there was  
 7 a great deal of excitement because superinjunctions were  
 8 being broken on Twitter, and indeed somebody set up  
 9 a Twitter account which somehow, some way, managed to  
 10 list seven or eight superinjunctions with relevant  
 11 details, then yes, that was taken forward by various  
 12 people on Twitter and it caused some excitement, but the  
 13 question for me is how that information got put into  
 14 social media in the first place.  
 15 Similarly, on the Trafigura matter, the identity of  
 16 the entity who was seeking to allegedly injunct  
 17 Parliament or threatened to injunct Parliament over the  
 18 Minton report, it was broken on Twitter, but all the  
 19 information which allowed people on Twitter to break  
 20 that information had been very carefully put into the  
 21 public domain by non-blogging social media sources. All  
 22 that happened is that people on Twitter were able to  
 23 just put things together and work out what -- you know,  
 24 who was actually threatening Parliament with an  
 25 injunction.

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1 So almost all the examples I can personally think  
 2 about in three years of using social media of alleged  
 3 abuses by people using social media often can be traced  
 4 back to somebody who may or may not have an agenda in  
 5 placing that information into social media in the first  
 6 place.  
 7 Q. At the very least, social media has the effect of  
 8 promulgating the information very widely and very  
 9 quickly, doesn't it?  
 10 A. Yes. I think the best -- social media covers things far  
 11 wider than politics and media. There are some fantastic  
 12 blogs out there which don't write about political  
 13 matters or media matters at all. But it is something  
 14 which can take reportage further.  
 15 Mainstream media are hard pressed. It's very  
 16 difficult to create content day after day. Things are  
 17 put out there. But what people in social media can do  
 18 is step back in their own time and put together in one  
 19 place all the material from disparate places for the  
 20 benefit of the readers, so it's becoming more often that  
 21 stories are being taken forward by citizens using social  
 22 media, blogging, tweeting, Facebook or whatever,  
 23 podcasts, videocasts on YouTube, because they have the  
 24 time and it's a form of active citizenship.  
 25 The notion that bloggers are out there as cowboys,

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1 which was put forward to this Inquiry by a witness here,  
 2 is looking at it in a very wrong way, in my opinion.  
 3 What you actually have are citizens who are now able to  
 4 use various forms of social media to share information  
 5 amongst themselves. It's very rare, in my experience,  
 6 for a blogger or tweeter to themselves place into the  
 7 public domain private information. What has usually  
 8 happened is they've taken it from some other source and  
 9 it's been tweeted or it's been blogged.  
 10 Q. Accepting that there are many very beneficial uses of  
 11 social media, which you've just touched upon, it's  
 12 right, though, isn't it, that it can be misused, someone  
 13 can use a blog or a tweet to intrude into people's  
 14 privacy without warrant, to promulgate inaccuracies, to  
 15 undermine injunctions, that can be done anonymously as  
 16 well?  
 17 A. That is the case. Social media can be misused just like  
 18 mainstream media can be misused and the law can be  
 19 misused.  
 20 Q. But the thoughts that I'm seeking are do you have any  
 21 views as to whether, in order to guard against such  
 22 misuse, it is feasible to regulate first of all  
 23 blogging?  
 24 A. I think there's two ways I'd like to address that  
 25 question. First of all is to make a very general point.

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1 At a number of times, people involved in social media  
 2 have shown a lot more responsibility than people in  
 3 mainstream media, so, for example, during the Lawrence  
 4 case, it could have been perfectly possible for  
 5 everybody to have linked to or reproduced the Rod Liddle  
 6 piece in the Spectator, which one wonders how it managed  
 7 into the Spectator but it was published and it shouldn't  
 8 have been published.  
 9 It didn't happen.  
 10 As regards the superinjunctions, yes, I think the  
 11 CTB, I think, injunction was widely mocked, not by me  
 12 but it was widely mocked, but when somebody went further  
 13 and put some very personal information into social  
 14 media, it wasn't retweeted. People said no, this isn't  
 15 good and it got very little traction.  
 16 My starting point in addressing the question you've  
 17 just posed is: there is a great deal of self-regulation  
 18 and responsibility because what you are dealing with is  
 19 not a type of person called blogger, you're actually  
 20 dealing with citizens who are communicating with each  
 21 other about issues that concern and interest them.  
 22 As regards regulation, I would suggest there are two  
 23 ways things are regulated. One is to take a very, shall  
 24 we say, formal approach to regulation that in  
 25 circumstance A you will face sanction B. And so you

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<p>1 have some sort of code, you have some sort of legitimacy                  2 for that code, you have some sort of way of practically                  3 enforcing that code and you have some sort of way of                  4 providing a sanction against somebody who is in breach                  5 of that code for no good reason.                  6 It is incredibly difficult to see how that sort of                  7 model of regulation could work with people just using                  8 social media to communicate with each other, of which                  9 blogging is just one kind.                  10 But there's another sense of the word regulate, for                  11 example when you use the phrase "I'm about to regulate                  12 my own conduct". There are things which make certain                  13 outcomes more likely, just because they are there. And                  14 but for them not being there, things would or wouldn't                  15 happen. And one way of helping social media is                  16 providing information. So the better blogs and the                  17 better tweeters link to information, so, for example, if                  18 I'm covering a legal case, which is live in the news,                  19 I can link to the statute, I can link to the caselaw,                  20 I can link to the CPR provisions, I can link to a whole                  21 range of materials which other entities have very kindly                  22 put on the Internet, and that just basically means that                  23 blogging and social media usage over time will be                  24 better, because they have access to better information.                  25 And that is one way of encouraging good blogging. It's</p> <p style="text-align: center;">Page 65</p>	<p>1 and analyse this and tell us what it means would be OpEd                  2 columnists or the occasional pamphleteer. Now anybody                  3 can do that.                  4 I think the best example of how blogging, social                  5 media and mainstream media work together is in science.                  6 Because there's been a dramatic improvement in science                  7 journalism overall, although we do get some quite silly                  8 tabloid stuff, because some of the best science                  9 journalists, like Adam Williford, Mark Henderson, Ian                  10 Semple(?), cooperate with bloggers, science bloggers,                  11 not only to source stories but to actually take stories                  12 forward. It's quite a wonderful thing to see how                  13 mainstream media are working with citizens now.                  14 I would actually say, looking at blogging and the                  15 blogosphere as something in itself and something which                  16 is capable of being regulated, and the question is                  17 should we or how you do it, is to look at how people are                  18 using social media in the wrong way.                  19 Q. Thank you. You go on to tell us at paragraph 7 of your                  20 witness statement that you pre-moderate comments on your                  21 blog.                  22 A. Yes.                  23 Q. Which has obviously worked well for you and promoted, as                  24 you tell us, the quality of the comments which are                  25 posted.</p> <p style="text-align: center;">Page 67</p>
<p>1 just to basically provide good, first rate information                  2 for citizens to be able to share amongst themselves and                  3 public bodies are doing that.                  4 And the media are in my opinion becoming better at                  5 working with social media rather than against social                  6 media.                  7 There are other ways, for example, in my view the                  8 Trafigura story was broken. I think that whoever posted                  9 that story in the Guardian had a very good inkling that                  10 citizens looking at it carefully would be able to work                  11 out which Parliamentary Question it was, and it                  12 happened, and it happened in real time in about 20                  13 minutes. I saw it happen, sitting at my screen, seeing                  14 political bloggers and tweeters actually saying "Wow,                  15 this is interesting. Where can we go with this? What                  16 public domain information is available?" And it was                  17 there.                  18 That is one way in which mainstream media works with                  19 social media.                  20 Another way is actually working with bloggers.                  21 Bloggers are not first-level reporters. The whole idea                  22 that you could replace reporting with blogging is                  23 misconceived. What actually is the case is reporters                  24 put the information into the public domain, but in the                  25 olden days, the only people who could actually sit back</p> <p style="text-align: center;">Page 66</p>	<p>1 A. Yes.                  2 Q. Plainly there are some sites that don't pre-moderate and                  3 there may be some that don't even post-moderate?                  4 A. Yes.                  5 Q. Would you regard it as good practice to pre-moderate?                  6 A. No, it's a matter of choice. An outstanding blogger is                  7 Nelson Jones who writes Heresy Corner. He does very                  8 similar work to me, forensic analysis, putting things                  9 together --                  10 LORD JUSTICE LEVESON: Mr Green, could you slow down?                  11 A. I'm sorry.                  12 LORD JUSTICE LEVESON: It's one of my repeated comments that                  13 people are speaking very quickly and because I'm trying                  14 to get it all recorded and transcribed, it can be lost.                  15 A. I apologise. I'll slow down.                  16 There's a blogger who does very similar work to me                  17 called Nelson Jones who writes the Heresy Corner blog.                  18 He doesn't pre-moderate and his comments are of                  19 a broadly similar quality to mine.                  20 I pre-moderate because first of all I write about                  21 sensitive issues. I'm also -- I also happen to be                  22 legally trained, so I do think I'm able to make the                  23 decisions on what should and shouldn't be posted. But                  24 the fact that I pre-moderate is possibly one reason why                  25 I have such good quality comments on my site, but it's</p> <p style="text-align: center;">Page 68</p>

<p>1 perfectly possible for a blogger to have good quality 2 sites without pre-moderation. 3 As regards those bloggers who have fairly vile 4 comments on their sites and refuse to take them down, 5 well, that's not what I would do, but they're just 6 exercising what they can do with social media in the way 7 they're choosing. I choose not to do that. 8 Q. You tell us in paragraph 8 of your witness statement 9 that in 2010, Jack of Kent was shortlisted in the 10 blogging category for the George Orwell prize for 11 political writing. You have been asked to co-judge the 12 blogging prize in 2011 and examined over 200 political 13 blogger entries. Also last year your New Statesman blog 14 was shortlisted alongside the blogs of the BBC's 15 business editor and the Economist's political editor in 16 the mainstream media blog category of the Editorial 17 Intelligence awards. 18 You also tweet and have a Facebook page. Your 19 Twitter account has 21,700 followers and your Facebook 20 page, 1,190 users. Do you think that the ethical and 21 regulatory questions which we've just been exploring 22 which relate to blogging apply similarly to Twitter and 23 to Facebook or is there a difference? 24 A. They are all different forms of social media. Twitter 25 is an extraordinary platform. On the face of it, you Page 69</p>	<p>1 I'm talking about and linked to it, and it's a very 2 efficient way of getting information on a particular 3 topic very, very quickly. 4 It's not a surprise, I think, that almost every 5 journalist now has a Twitter account. Because not only 6 is it a way of promoting your writing by saying this is 7 what I've written or this is what I like, but it's 8 a very good way of getting information very quickly on 9 emerging topics, and so you have some first rate what 10 are called anchor journalists like Neal Mann, who can 11 break stories far quicker because they are watching the 12 Twitter accounts of various things in separate lists, 13 can see something and then very quickly verify it or not 14 and break a story, and it is quite an interesting way of 15 gaining information. 16 But to think of it as Twitter or Facebook or 17 blogging, again I would suggest an alternative way is 18 just to think of it as different electronic technical 19 platforms of social media which people are using. So 20 yes, the same issues and concerns do cover all of them. 21 Q. You then go in your witness statement to tell us 22 a little bit about blogging, and in particular to give 23 us some pointers towards a definition but not an actual 24 definition. It's a form of self-publication, can be 25 immediate, well suited to responding to developing news Page 71</p>
<p>1 would expect Twitter to be a very limiting form of 2 communication because you only have 140 characters per 3 message. Normally you can -- there are certain ways of 4 extending them, but they're not possible. And you would 5 think this would be a way of limiting communication. 6 In fact it's worked out to be a very flexible way of 7 communication because for example you can link to 8 things, but the urls can be shortened, so they won't 9 take up that much of the 140 characters. So it's a very 10 good way of distributing links to people. So if I say 11 this is an interesting case, I can link to it, send it 12 to my followers and they can all click into it. 13 You can use what are called hashtags. They are used 14 in two ways. Sometimes they are used ironically, just 15 to say this is an aside to the main point of my tweet. 16 But what you can do with the so-called hashtags is that 17 you can click onto them and so you then can create 18 a list of all the tweets which are actually dealing with 19 that topic. 20 So, for example, with Leveson, there's a hashtag 21 which people are using at the moment and they click onto 22 that hashtag and then they will get the journalists who 23 are covering it, they will get people who are following 24 the comments. If I have mentioned a particular story, 25 there's perhaps somebody now just saying this is what Page 70</p>	<p>1 events, as you've just told us. You then go on to tell 2 us about live blogging and you draw a parallel with 3 pamphleteering and refer, as you have done orally a 4 moment ago, to the power of linking. 5 At the top of paragraph 21 of your witness 6 statement, you give an example of the ongoing 7 collaborative relationship that the blogger can have 8 with his readers to take matters further and develop 9 ideas, and you introduce your work about Mr Hari's blog 10 as David Rose. Your statement exhibits a lot of 11 material to show how that process occurred and it's 12 right, isn't it, that through your website you drew 13 attention to matters in the public domain which, when 14 put together, although you didn't name Mr Hari, enabled 15 others to put the jigsaw together? 16 A. Yes. I feel more comfortable talking in concrete terms 17 about blogging rather than abstract terms so if I could 18 come to the two examples I've exhibited because they're 19 very similar. One is for work I did on so-called 20 David Rose. The other one is something which of course 21 will be very familiar to the Inquiry, which is the 22 Night Jack blogging I've done, which serves two purposes 23 because it's something you all know about, so you can 24 see how it works, and second of all it's just been a 25 very interesting exercise in what blogging is capable of Page 72</p>

<p>1 in just a few days.</p> <p>2 In the Hari case there was an article in the</p> <p>3 Spectator, a diary column, as there is from time to</p> <p>4 time, so it was placed into the public domain as an</p> <p>5 issue by the mainstream media. It was by my friend the</p> <p>6 journalist Nick Cohen. He and a number of other</p> <p>7 journalists over a period of time had noticed that their</p> <p>8 Wikipedia entries were being distorted, hostile things</p> <p>9 were being put in and other things were being put in</p> <p>10 which tended over time to promote the career of another</p> <p>11 journalist, Johann Hari.</p> <p>12 It just seemed interesting and some the negative</p> <p>13 things which were put into those Wikipedia entries were</p> <p>14 actually quite nasty and I thought poor Nick, this is</p> <p>15 not very nice to actually have this sort of campaign</p> <p>16 against dependence you on the Internet.</p> <p>17 That's where it would have stayed because there's no</p> <p>18 reason it would have moved further, just in the</p> <p>19 mainstream media.</p> <p>20 I thought this is interesting and I thought is there</p> <p>21 a public interest in following this, is this worth</p> <p>22 writing about? And I thought yes, somebody apparently</p> <p>23 is using an account over time in a systemic way, there</p> <p>24 were over 900 edits of one kind or another over a number</p> <p>25 of years where the careers of various journalists were</p> <p style="text-align: center;">Page 73</p>	<p>1 who suggested to his editor that the journalist be sent</p> <p>2 for journalism training because I don't want to use my</p> <p>3 blogging for people to lose their jobs. It just doesn't</p> <p>4 seem appropriate. But it did seem an interesting</p> <p>5 question.</p> <p>6 We got to the point where it was fairly obvious who</p> <p>7 was behind this David Rose account and it was fairly</p> <p>8 obvious it was Johann Hari.</p> <p>9 No non-public information had been used in that</p> <p>10 exercise. All that had happened was bloggers and</p> <p>11 commenters had put together information which the</p> <p>12 David Rose person had put into the public domain</p> <p>13 themselves. It's just that we had put it together and</p> <p>14 analysed it.</p> <p>15 And then there were other allegations about the</p> <p>16 journalist, about plagiarism and fabrication, which came</p> <p>17 to a head, and so there was a suspension and eventually</p> <p>18 the journalist disclosed himself to his employer, that</p> <p>19 that is what he had been doing with his Wikipedia.</p> <p>20 So he wasn't outed by Jack of Kent. All we did was</p> <p>21 put together information which pointed in one direction</p> <p>22 because I thought it was important for the admission to</p> <p>23 come from the journalist themselves for what they had</p> <p>24 been doing.</p> <p>25 What has happened since is that a lot of other</p> <p style="text-align: center;">Page 75</p>
<p>1 being attacked whilst the career of a particular</p> <p>2 journalist was promoted at their expense.</p> <p>3 The person who used the account, they called</p> <p>4 themselves David Rose, had placed lots of information</p> <p>5 about themselves into the public domain on Wikipedia</p> <p>6 sites. A whole persona was created with a fantastic</p> <p>7 array of attributes. This was somebody who had spent</p> <p>8 two years in the Antarctic but also regularly subbed for</p> <p>9 the Independent. Every time somebody said "Actually,</p> <p>10 who are you, what about this?" he said "Oh, I can</p> <p>11 explain that away". It just seemed to be an</p> <p>12 extraordinary thing.</p> <p>13 I just wrote "Who is David Rose?" I just put</p> <p>14 a number of all these things in one place. Who is he?</p> <p>15 It just seemed an interesting question.</p> <p>16 And so over the course of 140 comments on my post</p> <p>17 various suggestion and theories were tried, nobody put</p> <p>18 any private information in there. There were no</p> <p>19 malicious comments published. Obviously he was</p> <p>20 a controversial journalist, there were certainly things</p> <p>21 I didn't publish on my blog because I didn't think it</p> <p>22 was appropriate and I just wanted to get to the bottom</p> <p>23 of who this person was.</p> <p>24 It wasn't an attempt to witch-hunt, in fact I never</p> <p>25 called for the journalist to be sacked. I was the one</p> <p style="text-align: center;">Page 74</p>	<p>1 things may have come to light. Lots of journalists are</p> <p>2 now telling me things which I should be publishing about</p> <p>3 the journalist and I think that's inappropriate because</p> <p>4 the person has apologised, although many people,</p> <p>5 including myself, don't think the apology is very</p> <p>6 satisfactory, but there is a point where you go from</p> <p>7 actually trying to look at something to something being</p> <p>8 a witch-hunt, and I don't want to go that far.</p> <p>9 Q. Thank you.</p> <p>10 A. The other example is Night Jack which I can come to</p> <p>11 later.</p> <p>12 Q. Yes.</p> <p>13 LORD JUSTICE LEVESON: Is there a risk that journalists are</p> <p>14 giving you information for you to put out in your blog</p> <p>15 that they wouldn't put out in their newspapers?</p> <p>16 A. It's happened occasionally that I have been approached</p> <p>17 on that basis. But on the other hand I don't think</p> <p>18 I have ever published something which I wouldn't be</p> <p>19 happy publishing had I got the information myself.</p> <p>20 I do think some journalists do have a relationship</p> <p>21 with bloggers like that. The nearest I've ever come to</p> <p>22 that situation was when a journalist from the Guardian</p> <p>23 had a copy of the Wikileaks nondisclosure agreement and</p> <p>24 I thought this was an interesting issue that Wikileaks,</p> <p>25 which supposedly was in favour of transparency, had</p> <p style="text-align: center;">Page 76</p>

<p>1 imposed a confidentiality agreement on its staff where 2 I think it was something like a £12 million penalty 3 clause, which was an extraordinary thing. And so 4 I published that in the New Statesman, and once that was 5 out in the public domain, then the journalist who had 6 passed it to me actually said this was my document which 7 I had been given. 8 I think that's the only example which comes readily 9 to mind of me co-operating with a journalist in the 10 mainstream media, but I don't think I've ever been used 11 by a journalist to put something in the public domain 12 which they wouldn't feel happy publishing themselves. 13 MR BARR: Your statement goes on to deal with Twitter, much 14 of which you have already addressed but there's one 15 issue I would like you to expand upon. You talk about 16 a process of significant but informal peer approval and 17 self-regulation on Twitter. 18 A. Yes. 19 Q. From your experience, how does that work? 20 A. Well, two or three ways. People will very readily 21 comment on what you say on Twitter and the more 22 followers you have, the more people who watch your 23 Twitter account, the more comments like that you have, 24 and it is actually quite brutal sometimes and upsetting. 25 On the other hand, it does make sure if you are doing</p> <p style="text-align: center;">Page 77</p>	<p>1 self-regulation. There's transparency, you can see how 2 influential somebody is or not, you can see them by 3 their follow account or how often they retweet. There 4 is accountability. If you do something wrong, you will 5 very, very quickly know about it. And so in a way it is 6 a good example of self-regulation, because it polices 7 itself and gives itself the information to allow it to 8 police itself. 9 Q. Your witness statement continues by exploring the 10 relationship between social media and the mainstream 11 media? 12 A. Yes. 13 Q. You do this in two parts. First of all, looking at 14 negative aspects, and you give us examples where you 15 tell us that the mainstream media has abused material 16 available in social media. The first example you give 17 us is the way in which the Scottish edition of the 18 Sunday Express on 8 March 2009 used material from 19 Facebook to write an article about Dunblane survivors 20 for which they later had to apologise. 21 Then you also tell us that there have been instances 22 where photographs posted on Facebook, essentially for 23 private purposes, have then been used by the mainstream 24 media without obtaining permission first? 25 A. Yes. I'll just deal with the Sunday Express thing</p> <p style="text-align: center;">Page 79</p>
<p>1 something which isn't quite right, you're called out on 2 it straight away and people say this is wrong or you've 3 got something wrong. 4 The other way peer review works is that over time 5 certain tweeters will gain more followers or gain more 6 credibility, some lose credibility. It's not like 7 message boards where everybody has space to go as long 8 as they want. You can choose who you follow. So there 9 are journalists who -- and bloggers and tweeters who 10 have built up very high follower accounts just because 11 they over time are seen as a reliable source of legal 12 information or science information. 13 I would say it's analogous to what I view the 19th 14 century city of London must have been like, that 15 everybody just knew each other's reputation. You can 16 quickly see their follower account, who they follow, 17 whether they have credentials, whatever. You can 18 instantly form a view, not always the correct view, but 19 you can instantly form a view as the credibility of 20 a tweeter. 21 Somebody wants to go onto Twitter just to be 22 malicious and send lots of abusive tweets, you will -- 23 they will find it very difficult to build up 24 a substantial follow account over time. 25 These are two ways where there is what I would call</p> <p style="text-align: center;">Page 78</p>	<p>1 first. It was an absolutely horrific episode in 2 journalism. Some journalist on the Scottish edition of 3 the Sunday Express got access to the Facebook accounts 4 of the individuals who had been unfortunately caught up 5 in the Dunblane massacre. They were teenagers. They 6 were acting like teenagers, they were talking to each 7 other about what they did as teenagers. This is what 8 social media is for. They're in different places, 9 they're able to communicate with each other. 10 The Sunday Express took it upon itself to make this 11 a major story. It took examples of exchanges and 12 photographs and tried to make out that the survivors of 13 Dunblane were being disrespectful in acting like this, 14 that it was scandalous. 15 It was an utterly horrible piece of journalism, and 16 it's something which I would invite the Inquiry to have 17 a look at as an episode because I think it's the worst 18 single example of newspaper abuse of social media. 19 There was outrage, and the outrage was converted 20 into a campaign, an online campaign, which within a week 21 forced the Sunday Express, Scottish edition, to 22 apologise. 23 LORD JUSTICE LEVESON: So the date of the apology is 2009, 24 not -- 25 A. 2009, I apologise, that's a typographic error.</p> <p style="text-align: center;">Page 80</p>

<p>1 LORD JUSTICE LEVESON: Not 2011.</p> <p>2 MR BARR: The point is the apology was forced through social 3 media before the PCC could comment?</p> <p>4 A. Yes. These outrages come and go and sometimes they are 5 disproportionate and you do think why are so many people 6 outraged? All that is happening, it isn't that the 7 social media platform is causing the outrage, it's just 8 people acting as citizens are outraged at something they 9 have seen, and it worked very quickly with the Dunblane 10 matter. I apologise for the typographic error.</p> <p>11 LORD JUSTICE LEVESON: No, no, no.</p> <p>12 MR BARR: Do you think that there's a need for any further 13 regulation of the mainstream media in its use of social 14 media or do you think that the existing definitions in 15 the PCC code are sufficient to cover the abuses that 16 you've come across?</p> <p>17 A. The best way of approaching that question is to draw to 18 the Inquiry's attention the use tabloids are now 19 routinely making of photographs taken from Facebook and 20 Flickr. Because it is casual, it is routine, they take 21 a view on the risk. They have no right to use that 22 photograph for that purpose, it seems to me. They know 23 that they're probably infringing copyright in doing so, 24 but they've taken a view on the risk that they won't 25 face any legal action.</p> <p style="text-align: center;">Page 81</p>	<p>1 There's no public interest in this. This is a very 2 personal operation for people or whatever, or 3 a psychological experience where they're having 4 counselling. It's a very difficult time for people to 5 go through, and then a tabloid will get photographs of 6 them and do a before and after, just to humiliate them, 7 just because it's something to do. It's wrong. There's 8 no public interest in doing it, and these sort of things 9 are still carrying on.</p> <p>10 LORD JUSTICE LEVESON: When you say it's rife --</p> <p>11 A. I said it's routine.</p> <p>12 LORD JUSTICE LEVESON: Or routine, can you point me to 13 evidence of that?</p> <p>14 A. I have asked for examples on Twitter and I was given 15 quite a few examples, and you will see in my witness 16 statement I'm intending to do a supplementary witness 17 statement detailing these.</p> <p>18 LORD JUSTICE LEVESON: Yes, I noticed that you were planning 19 to do a further statement.</p> <p>20 A. It's just that I was given so much information on 21 examples of how social media helps improve media and 22 abuses, it seemed to me best to do a short initial 23 witness statement for the purposes of today, and then to 24 follow that up with detailed examples in a further 25 witness statement.</p> <p style="text-align: center;">Page 83</p>
<p>1 They certainly wouldn't use photographs taken from 2 a picture agency in that way. It's a form of free 3 content.</p> <p>4 The reason why I highlight those points to the 5 Inquiry is I think that is to an extent broadly 6 analogous with what the culture of phone hacking or 7 email hacking was five or six years ago. I do not think 8 many journalists actively decided to break the law, they 9 had the means to do so and views were taken on whether 10 laws would be enforced or not.</p> <p>11 So to hear that tabloids realise that they shouldn't 12 have been doing telephone and email hacking when they 13 are routinely misusing on a day-to-day basis photographs 14 taken to which I don't think they are entitled I think 15 is a way of seeing how regulation works even now, 16 because they shouldn't be infringing copyright in that 17 way but they routinely do.</p> <p>18 And the people whose photographs are taken from 19 their Facebook account and published to the world with 20 sensational copy and published on the Internet, it's 21 traumatic and humiliating to the individuals involved.</p> <p>22 I understand the Inquiry are going to have somebody 23 from Trans Media Watch on this, and I helped them with 24 their submission, where the only public interest in the 25 story is that somebody has a gender reassignment.</p> <p style="text-align: center;">Page 82</p>	<p>1 LORD JUSTICE LEVESON: I'd be very grateful, and it may be 2 sufficient merely to publish that further statement 3 rather than ask you to come and speak to it, but I would 4 be grateful.</p> <p>5 A. I should be grateful if it could just be published.</p> <p>6 LORD JUSTICE LEVESON: Thank you.</p> <p>7 MR BARR: The third category of abuses that you tell us 8 about is the exposure of anonymous bloggers. At 9 paragraph 33 of your witness statement you name two, 10 Night Jack and Girl With a One Track Mind. At 11 paragraph 34, you also mention Belle Du Jour. In your 12 exhibits, you've also shown us the comments you've had 13 about the Night Jack story?</p> <p>14 A. Yes.</p> <p>15 Q. And your work to try and establish how the exposure of 16 Night Jack's identity came about.</p> <p>17 A. Yes.</p> <p>18 Q. I've shown you before you started giving evidence 19 a letter that the Inquiry has received from the Times, 20 from the editor Mr Harding, dated 19 January this year, 21 that's last Thursday, after he gave evidence, which 22 contains some further information about what the Times 23 says about this matter. I'll read it out. It says: 24 "In June 2009, we published a story in what we 25 strongly believed was of public interest. When the</p> <p style="text-align: center;">Page 84</p>

<p>1 reporter informed his managers that in the course of his                  2 investigation he had, on his own initiative, sought                  3 unauthorised access to an email account, he was told                  4 that if he wanted to pursue the story, he had to use                  5 legitimate means to do so. He did, identifying the                  6 person at the heart of the story, using his own sources                  7 and information publicly available on the Internet.                  8 "On that basis, we made the case in the High Court                  9 that the newspaper should be allowed to publish in the                  10 public interest. After the judge ruled that will could                  11 publish in the public interest, we did.                  12 "We also addressed the concern that had emerged                  13 about the reporter's conduct, namely that he had used                  14 a highly intrusive method to seek information without                  15 prior approval. He was formally disciplined. The                  16 incident has also informed our thinking in putting in                  17 place an effective audit trail to ensure that in the                  18 future we have an adequate system to keep account of how                  19 we make sensitive decisions in the news-gathering                  20 process.                  21 "This was an isolated incident and I have no                  22 knowledge of any else like it. If the Inquiry has any                  23 further questions about it I would, of course, be happy                  24 to answer them."                  25 The whole of this letter will in due course be</p> <p style="text-align: center;">Page 85</p>	<p>1 injunction hearing before Mr Justice Eady.                  2 At that hearing, the Times told Mr Justice Eady --                  3 LORD JUSTICE LEVESON: I'm not sure that you need to                  4 rehearse the history for us, because now you're just                  5 doing that. I'm more interested in how --                  6 A. The point I was hoping to reach was that that                  7 information in that letter should have been given to the                  8 court before Mr Justice Eady.                  9 LORD JUSTICE LEVESON: That's an issue which I will have to                  10 think about, of course. But your blog, which discusses                  11 this at some length and comes back to it, speaks of                  12 a concern -- and was this your concern or somebody                  13 else's -- that the research had been done backwards.                  14 I think you used the analogy of a maze, working from the                  15 inside out rather than the outside in.                  16 A. Yes. When I first came across this story in 2009                  17 I wrote about it and I thought it was a spectacular                  18 piece of detective work to have worked out Night Jack's                  19 identity from the information on his blog. It just                  20 seemed an astonishingly good piece of journalism to have                  21 actually achieved that.                  22 It always struck me that it was a very, very neat                  23 explanation for how it was done, which was perfect, and                  24 I've seen the witness statement of the journalist and it                  25 reads like a detective novel. It's a great piece of</p> <p style="text-align: center;">Page 87</p>
<p>1 published on the Inquiry's website.                  2 A. That letter was dated?                  3 Q. Last Thursday.                  4 My question to you is: from your knowledge, from                  5 your blogging activities, are you able to say one way or                  6 another anything about the veracity of that account?                  7 A. I have no separate information to verify or otherwise                  8 the statement, but I would like to make a couple of                  9 comments on that letter.                  10 First of all, it's odd that that information wasn't                  11 given at the time of witness statements given the                  12 question which was posed to the Times editor.                  13 The second point is that the chronology of who did                  14 what and when is actually quite difficult to follow                  15 initially. A decision was made to publish information                  16 based on an investigation where email hacking had                  17 occurred as part of it. Well, it may well be that                  18 there's a public interest in that. I can think of                  19 circumstances where there could be a public interest in                  20 using that sort of means, but it wouldn't be my                  21 decision, it's the editor's decision.                  22 The blogger, Jack Night was his blogging name, was                  23 notified. He got the phone call. He contacted lawyers.                  24 The Times was contacted. They agreed not to publish                  25 immediately and then there was a privacy hearing, an</p> <p style="text-align: center;">Page 86</p>	<p>1 journalism. But I just thought I'm not quite convinced.                  2 There must have been some sort of other ways in which                  3 information was verified.                  4 But I didn't give it a second thought really for two                  5 years because it had come and gone and the Times had                  6 assured the court that it was done entirely on publicly                  7 available information.                  8 And then as I've set out there was a witness                  9 statement from the interim head of legal just mentioning                  10 it. It was the first of the witness statements to be                  11 published. I didn't know if there were going to be                  12 other witness statements published at all, whether it                  13 was going to be mentioned. But I noticed it because it                  14 was reported by the Press Gazette and that's the only                  15 reason I noticed it and they didn't make anything big of                  16 it and it wasn't featured in any of the other papers to                  17 any great extent. Not that I saw anyway.                  18 Q. If I could just stop you there, does it come to this,                  19 that there may still be an unanswered question about                  20 whether anything that was gained from the email hacking                  21 in fact was used to assist the identification?                  22 A. I've not made that allegation, but it just seems an                  23 artificial exercise to separate out --                  24 Q. I'm not suggesting you made the allegation, but I am                  25 asking: is that still the unanswered question?</p> <p style="text-align: center;">Page 88</p>

<p>1 A. It seems to me that if you have used an email hack as 2 part of an investigation, you can't artificially pretend 3 you never did that. You will use that information as 4 part of solving the puzzle which you have set yourself. 5 What seems to me to have gone wrong is that at the 6 time it wasn't very clear to the managers the role -- 7 the hacking had taken place and the Times has said 8 itself in fact they are unclear as to the actual role 9 although they are assured that the identification had 10 been above board. 11 My concern is this should have been before the court 12 at the injunction application. 13 Q. Thank you. You go on in your witness statement to tell 14 us about the positive aspects of social media. 15 A. Yes. 16 Q. We have the statement, which is taken as read, so 17 I needn't ask you to develop it at any length. 18 LORD JUSTICE LEVESON: Just before you pass on, I mean your 19 real point, which is I think the value of going down 20 this line as a general illustration, is that the power 21 of those who comment on blogs and who write blogs is 22 potentially very great because of the use that had been 23 made of legitimately available information but by many 24 people. 25 A. Yes.</p> <p style="text-align: center;">Page 89</p>	<p>1 way of writing. 2 I contact those involved, I ask for press 3 statements. I try and work out what happened 4 procedurally and how the case ended up in the court or 5 whatever, and then what I will do is set out what the 6 Crown Prosecution Service said, what the defence lawyer 7 said, point out what the applicable law is, in a way 8 which I hope is accessible to lay people, and so rather 9 than telling people what they should think about a case, 10 although I do have my opinions, what I'm providing are 11 the tools by which citizens who come across my blog can 12 form their own views on those cases. 13 LORD JUSTICE LEVESON: You might even actually explain 14 sometimes why judges do what they do in a way that is 15 more accessible than judges do. 16 A. I explain cases as carefully as I can to lay people in 17 a different medium. I would never in any circumstance 18 criticise a judge in my blog. 19 LORD JUSTICE LEVESON: You didn't have to say that, 20 Mr Green. 21 A. I will criticise their decisions. 22 LORD JUSTICE LEVESON: Oh. 23 A. But I was able to write about the Simon Singh libel case 24 over two years, which was an incredibly illiberal case 25 to have been brought against Simon Singh and I don't</p> <p style="text-align: center;">Page 91</p>
<p>1 LORD JUSTICE LEVESON: That's the real point behind all 2 this, isn't it? 3 A. Yes. That's the point I want to make. 4 LORD JUSTICE LEVESON: Yes. 5 A. I would say that social media and active citizenship 6 using social media platforms is part of the solution to 7 how we can have a better mainstream media in this 8 country. It isn't as if that is part of the problem to 9 be solved, I think it's actually part of how we can go 10 about getting better news, better analysis. 11 There are a number of bloggers out there who do 12 exactly the same as what I have done on other subjects. 13 I just happen to have covered Night Jack and other media 14 law stories. 15 LORD JUSTICE LEVESON: Yes. You make the point in relation 16 to your own blogging about how you use your blog to 17 expose decisions, explain them, challenge them and 18 comment as you feel appropriate. 19 A. Well, typically I see something in the news, it's what 20 I call a bad law story, where either there has been some 21 very bad journalism or there has been an abuse of power. 22 But the usual thing is that the law is an ass. You see 23 these stories all the time, they are a staple. And 24 sometimes the law is an ass and needs to be exposed as 25 such but sometimes it's just that this is a formulaic</p> <p style="text-align: center;">Page 90</p>	<p>1 think I mentioned Sir David Eady once or criticised him 2 once. 3 LORD JUSTICE LEVESON: All right, I understand the point. 4 MR BARR: Thank you. Two more short points. You are making 5 the point in your witness statement that people 6 shouldn't come to sweeping stereotypes about who 7 bloggers are, and point out that there are a lot of very 8 eminent people doing a lot of very positive blogging 9 work in many fields. 10 A. Yes. 11 Q. The other point, a technical one, paragraph 53 of your 12 witness statement, where you tell us in fact you have no 13 idea where the servers of the website which hosts your 14 blog are located. 15 A. No. I could find out if I so wished, but it's not an 16 important issue for me. I'm just using a platform which 17 is available to any citizen, you just type into a box 18 and it's then published, and anybody can do that. 19 Q. You're using one of two -- 20 A. Main ones. 21 Q. -- principal routes of blogging? 22 A. Yes, there's Wordpress and there's Blogger, and people 23 who either are not part of a mainstream site or haven't 24 built their own website will tend to just open a blog 25 account and it's as easy to open as an email account and</p> <p style="text-align: center;">Page 92</p>

<p>1 then you can just publish to the world.</p> <p>2 Q. The question which arises from that: if someone does</p> <p>3 post something which is objectionable, if the servers</p> <p>4 are outside the jurisdiction, and I use the word if</p> <p>5 advisedly, it makes it very difficult, doesn't it, if</p> <p>6 the blogger refuses to take down the post?</p> <p>7 A. Yes. But I personally think blogging in terms of formal</p> <p>8 regulation is best left to the law of the land. If you</p> <p>9 have a copyright or privacy or libel claim, it's just</p> <p>10 a different form of publication and can be subjected to</p> <p>11 the general law of the land. That's why I used that</p> <p>12 phrase.</p> <p>13 LORD JUSTICE LEVESON: Provided, of course, that the person</p> <p>14 who is affected knows the identity of the person who is</p> <p>15 writing the blog. If you blog in an adopted name, and</p> <p>16 do not disclose who you are, then --</p> <p>17 A. That is a problem, but it's also quite difficult to see</p> <p>18 what a solution to that problem would be now that</p> <p>19 anybody can just publish on the Internet.</p> <p>20 LORD JUSTICE LEVESON: I understand. But that's quite an</p> <p>21 important position because it's fine for you to say I'm</p> <p>22 subject to the law of the land and if I defame somebody,</p> <p>23 they can sue me, but that's because they know your name.</p> <p>24 A. Yes. However, unless a blogger has built up a following</p> <p>25 or has become popular, you can publish stuff and it</p> <p style="text-align: center;">Page 93</p>	<p>1 a platform, which they pay for for me to use for free,</p> <p>2 and their commercial model may well be they just want to</p> <p>3 get somebody onto their platform so they can promote</p> <p>4 their platform as having such-and-such content.</p> <p>5 The starting point is not how do you earn money out</p> <p>6 of blogging but how can you participate in the debate.</p> <p>7 LORD JUSTICE LEVESON: Should there be a difference between</p> <p>8 those who commercialise their use of social media by</p> <p>9 encouraging advertisements or whatever, and those who</p> <p>10 are doing no more than just speaking loudly actually to</p> <p>11 the world at large rather than to their next door</p> <p>12 neighbour?</p> <p>13 A. Yes, but a blog will not gain any traction just because</p> <p>14 of its advertising. So you may try and use that as</p> <p>15 a means of regulating some blogs and not others, but I'm</p> <p>16 struggling for the moment to think of a way that could</p> <p>17 be converted into meaningful regulatory action.</p> <p>18 LORD JUSTICE LEVESON: I wasn't necessarily doing that.</p> <p>19 I was just trying to understand how and why it works.</p> <p>20 A. Yes. I personally don't like the word "blogging" and</p> <p>21 I do try and avoid it as much as possible, but whenever</p> <p>22 I try to use a synonym I'm mocked so I have to stick to</p> <p>23 I am a blogger.</p> <p>24 But it isn't a category of activity which is very</p> <p>25 tight. It's just writing for the Internet on things</p> <p style="text-align: center;">Page 95</p>
<p>1 won't get noticed necessarily unless it's picked up by</p> <p>2 somebody else. It's easy to publish, but it's not that</p> <p>3 easy to popularise something. That does take somebody</p> <p>4 else to take an interest. You can't set up an anonymous</p> <p>5 website and publish to the world and expect the world to</p> <p>6 notice.</p> <p>7 MR BARR: Thank you. Those are all my questions.</p> <p>8 LORD JUSTICE LEVESON: I have one other set of questions,</p> <p>9 please, Mr Green.</p> <p>10 Without being too inquisitive, how does a blog --</p> <p>11 I'm not necessarily saying your blog -- make money or</p> <p>12 does it not make money?</p> <p>13 A. I think I've probably earned, which I've never claimed,</p> <p>14 about £12 in all my time at Jack of Kent through</p> <p>15 Google AdWords. Most of the adverts are for</p> <p>16 chiropractor practices which I find quite amusing</p> <p>17 because that's the main case I wrote about for two</p> <p>18 years. You don't do it to earn money. You do it</p> <p>19 because you want to participate to a public debate.</p> <p>20 On the New Statesman I'm paid as a freelancer, but</p> <p>21 some bloggers are able to gain income from traffic. But</p> <p>22 most people who use blogging don't do it for financial</p> <p>23 reasons, but because they want to be part of a civic</p> <p>24 society. Somebody has to pay to host it, and that's why</p> <p>25 Blogger and Wordpress exist, and they provide</p> <p style="text-align: center;">Page 94</p>	<p>1 which interest you. It used to mean that you had</p> <p>2 a weblog and you used it in a formal way, but I think</p> <p>3 the meaning is becoming so elastic and that's why in my</p> <p>4 statement I'm careful not to offer a definition but just</p> <p>5 some pointers as to how this is different from other</p> <p>6 forms of media.</p> <p>7 LORD JUSTICE LEVESON: All right. Thank you very much</p> <p>8 indeed.</p> <p>9 A. Thank you.</p> <p>10 MR JONATHAN GRUN (affirmed)</p> <p>11 Questions by MS PATRY HOSKINS</p> <p>12 MS PATRY HOSKINS: Good afternoon. You have provided</p> <p>13 a statement to the Inquiry which you should find behind</p> <p>14 tab 1 in the bundle before you. Please state your full</p> <p>15 name.</p> <p>16 A. It's Jonathan David Grun.</p> <p>17 Q. The statement that you've provided is not in the form of</p> <p>18 a witness statement with a statement of truth. Can</p> <p>19 I confirm that it is your evidence to the Inquiry and</p> <p>20 that you can confirm that the contents of it are true to</p> <p>21 the best of your knowledge and belief?</p> <p>22 A. Yes, I can confirm that.</p> <p>23 Q. You explain in your statement that you are the editor of</p> <p>24 the Press Association. First of all, can you tell us</p> <p>25 how long you have been editor?</p> <p style="text-align: center;">Page 96</p>



<p>1 A. I've been editor of the Press Association since 2000.</p> <p>2 Q. Were you at Press Association before --</p> <p>3 A. Yes. Before that I joined as a reporter in 1979.</p> <p>4 Q. Can we firstly explore, please, what the Press</p> <p>5 Association is. You explain at the second paragraph of</p> <p>6 your statement that the Press Association was founded in</p> <p>7 1868 and you say that it is the national news agency of</p> <p>8 the United Kingdom. Why have you chosen that phrase?</p> <p>9 Why is it the national news agency of the United</p> <p>10 Kingdom?</p> <p>11 A. I think it's really as a statement of fact. There are</p> <p>12 other agencies but they operate more on a regional</p> <p>13 basis. We are the only national news agency that has</p> <p>14 reporters both in London -- reporters, photographers</p> <p>15 both in London and across the rest of the country.</p> <p>16 Q. You explain in the same paragraph that you provide</p> <p>17 a service to every media organisation covering</p> <p>18 broadcast, print and online. How many staff do you</p> <p>19 employ?</p> <p>20 A. If we look at our news wire, we have something in the</p> <p>21 region of about 100 sharp-end news reporters. More</p> <p>22 widely across the whole of the Press Association, we</p> <p>23 probably have in excess of 600 people engaged in</p> <p>24 editorial-related business. For example, we provide</p> <p>25 listings information for our customers. We produce</p> <p style="text-align: center;">Page 97</p>	<p>1 24, for example, if we put out a news alert on the wire,</p> <p>2 then they will pick that up and use it straight away.</p> <p>3 They may attribute it to the Press Association, but they</p> <p>4 will use it straight away.</p> <p>5 Q. I'll come back to whether or not they have to make any</p> <p>6 further checks. I just want to finish on the statement</p> <p>7 of editorial values. If we look at the fourth</p> <p>8 paragraph, we can see that you state in simple terms</p> <p>9 that you do not have any political views. You write no</p> <p>10 opinionated editorials or editorials of any kind</p> <p>11 whatsoever. You don't campaign or crusade. You simply</p> <p>12 gather news and pictures and distribute them as fast as</p> <p>13 modern communication systems will allow. Is that still</p> <p>14 a fair and accurate representation of what you aim to</p> <p>15 do?</p> <p>16 A. Absolutely, and it has been ever since we were founded</p> <p>17 in 1868. The PA isn't for anyone or against them. We</p> <p>18 simply try to provide straight reporting. Fair,</p> <p>19 impartial reporting.</p> <p>20 Q. Can I turn to how you maintain the standards. You</p> <p>21 explain that there is clearly an onus on you to be first</p> <p>22 with the news and an onus on you to be as accurate as</p> <p>23 possible?</p> <p>24 A. That's right.</p> <p>25 Q. You put those burdens on yourself but you've already</p> <p style="text-align: center;">Page 99</p>
<p>1 ready-made newspaper pages for them as well.</p> <p>2 Q. You've touched on what you provide but am I right in</p> <p>3 saying that essentially you provide news stories through</p> <p>4 the wire service, photographs and video content? Would</p> <p>5 that be right?</p> <p>6 A. That's right. A constant stream of news stories, sports</p> <p>7 stories, pictures and increasingly we're complementing</p> <p>8 that content with video as well.</p> <p>9 Q. Turn to the appendix to your statement, the third page.</p> <p>10 You explain that this is your statement of editorial</p> <p>11 values as posted on the agency's intranet. There's</p> <p>12 a heading, "Why people trust the Press Association", and</p> <p>13 you set out there your core editorial values. You say</p> <p>14 they can be summarised in three words: "fast, fair and</p> <p>15 accurate".</p> <p>16 The statement of editorial values goes on to say</p> <p>17 toward the end of the third paragraph:</p> <p>18 "When a story breaks, the cry across the newsroom</p> <p>19 that it's on PA is the catalyst for action."</p> <p>20 Does that mean that you consider PA-provided news to</p> <p>21 be taken seriously as accurate?</p> <p>22 A. Yes. I mean, the bond of trust that we have with our</p> <p>23 customers means that they have to be able to use</p> <p>24 anything that we provide them without making any further</p> <p>25 checks. If you watch breaking news on Sky or BBC News</p> <p style="text-align: center;">Page 98</p>	<p>1 touched on this. You also say that your customers must</p> <p>2 be able to use a PA story without making any further</p> <p>3 checks. Does that mean that you wouldn't expect someone</p> <p>4 buying your story to need to check the accuracy of it at</p> <p>5 all?</p> <p>6 A. That is the arrangement that we have with our customers.</p> <p>7 Of course they can develop stories, they can go out and</p> <p>8 expand on them, many of them do, but we undertake that</p> <p>9 the material that we provide on the wire can be used as</p> <p>10 it is.</p> <p>11 Q. So the responsibility for the accuracy of your story</p> <p>12 remains with you, in your view?</p> <p>13 A. Well, I always take the responsibility for providing</p> <p>14 accurate content. We say that we're fast, fair and</p> <p>15 accurate. Of course, the most important one of those is</p> <p>16 that we're accurate. It's good to be first with</p> <p>17 a story, but first you have to be right. And those are</p> <p>18 the sort of guiding principles that have stood us in</p> <p>19 good stead over the years.</p> <p>20 Q. Let's concentrate on how you aim to achieve such high</p> <p>21 standards. I'm going to deal first with stories and</p> <p>22 then photographs. Let's start with sources. On page 2</p> <p>23 of the statement you say:</p> <p>24 "All stories have a source."</p> <p>25 Well, yes, that's clearly right.</p> <p style="text-align: center;">Page 100</p>

25 (Pages 97 to 100)

<p>1 A. Yes.</p> <p>2 Q. I want to understand how that protects you. Is one</p> <p>3 source sufficient or is one named source sufficient in</p> <p>4 your view?</p> <p>5 A. The reason why, for example, the BBC and Sky, ITN and</p> <p>6 other broadcasters, online services would be able to use</p> <p>7 PA without making further checks is because it's not us</p> <p>8 saying something has happened, it's a named source</p> <p>9 that's saying something has happened. All of our</p> <p>10 stories have an attributable source, often -- usually on</p> <p>11 the record, almost always named as well, so that</p> <p>12 provides protection for us and for our customers at the</p> <p>13 same time.</p> <p>14 It is a fact that if we're quoting an organisation,</p> <p>15 if an organisation has put out a statement, I can't</p> <p>16 actually verify the truth of what they're saying, but</p> <p>17 what I can say is that they've said it and I can</p> <p>18 attribute it to them, so that provides a measure of</p> <p>19 protection for the Press Association that we're</p> <p>20 providing an accurate reporting service, and our</p> <p>21 customers are able to use the material knowing that they</p> <p>22 can attribute it to a named source.</p> <p>23 LORD JUSTICE LEVESON: Would you be troubled if the named</p> <p>24 source had given you a story but which itself was</p> <p>25 defamatory of a third person?</p> <p style="text-align: center;">Page 101</p>	<p>1 content of it is. It may well -- most news conferences</p> <p>2 have involved people being critical about other people.</p> <p>3 We'll look at the nature of the critical comments and</p> <p>4 probably run those on the wire, but then we'd also go to</p> <p>5 the person who is being criticised later, not before</p> <p>6 publication, later --</p> <p>7 LORD JUSTICE LEVESON: By definition, because you're doing</p> <p>8 it all live.</p> <p>9 A. Because we're doing it live, yes. That's one of the</p> <p>10 things about an agency service, that the people who</p> <p>11 actually write it, they're supplying breaking news</p> <p>12 stories to our customers maybe two or three sentences at</p> <p>13 a time. If we're reporting the events of a news</p> <p>14 conference, the event will still be going on while we're</p> <p>15 running what we call copy, story, to our customers.</p> <p>16 MS PATRY HOSKINS: You say in your witness statement that</p> <p>17 editorial standards are your responsibility, but that</p> <p>18 you report to an independent Press Association board.</p> <p>19 A. Yes.</p> <p>20 Q. Can you tell us two things. First, in what way is it</p> <p>21 independent? Secondly, what's its role?</p> <p>22 A. It was set up about three years ago to provide some kind</p> <p>23 of oversight of the editorial operation. I report to</p> <p>24 them twice a year. I submit a written report to them</p> <p>25 twice a year, and we have a meeting at least twice</p> <p style="text-align: center;">Page 103</p>
<p>1 A. Yes. I hope at that point some of our other editorial</p> <p>2 checks would come into play and, depending on the</p> <p>3 circumstances in which they'd made the statement,</p> <p>4 whether there was any privilege associated with it or --</p> <p>5 but I would hope that -- the fact is, when -- one of the</p> <p>6 checks we have is that yes, a named source may be saying</p> <p>7 something, we would obviously be wary if it appeared to</p> <p>8 be defamatory.</p> <p>9 We'd also apply what you could call experience and</p> <p>10 common sense to what they're saying as well. Just</p> <p>11 because someone is saying something, it doesn't</p> <p>12 necessarily say that we'll send it on to our customers.</p> <p>13 We might therefore want to go and make further checks.</p> <p>14 LORD JUSTICE LEVESON: I'm pleased that common sense comes</p> <p>15 into it somewhere, Mr Grun, but I'm just actually</p> <p>16 probing that a little bit more. Obviously if one of</p> <p>17 your reporters goes to a court, then what has been said</p> <p>18 in court is easy. But to what extent would your</p> <p>19 reporters go beyond the word of their source to validate</p> <p>20 the information or would you leave that to your</p> <p>21 customers?</p> <p>22 A. I think it very much depends on the circumstances, on</p> <p>23 the story that we are covering. If we are reporting,</p> <p>24 for example, a news conference, we will be running that</p> <p>25 story live. We'll be looking at it to see what the</p> <p style="text-align: center;">Page 102</p>	<p>1 a year, where they're able to talk to me about the work</p> <p>2 of the agency. Of course, I tell them about the good</p> <p>3 things that we do, but I also tell them about the</p> <p>4 mistakes that we've made and if any lessons can be drawn</p> <p>5 from those mistakes, what I'm doing to and what I and my</p> <p>6 team are doing to change our editorial procedures, to</p> <p>7 tighten up, to try and make sure that they don't happen</p> <p>8 again.</p> <p>9 As I understand it, the Trust or the Consultative</p> <p>10 Committee, I think is its formal title, is independently</p> <p>11 constituted and it submits a report to the main board of</p> <p>12 the Press Association in time for the annual report, to</p> <p>13 report on our editorial activities.</p> <p>14 As I say, it's been in existence for about three</p> <p>15 years. I think it probably was a foresighted decision</p> <p>16 to set it up. It certainly has, I think, been able to</p> <p>17 provide reassurance to our customers about the quality</p> <p>18 of the editorial service and also reassurance to the</p> <p>19 journalists who work at the PA as well. And it's been</p> <p>20 very useful for me as well because it does mean that of</p> <p>21 necessity I have to focus on editorial standards, and</p> <p>22 when things go wrong, I have to consider what I'm going</p> <p>23 to tell them about it and what I need to do about it to</p> <p>24 make sure things like that don't happen again.</p> <p>25 LORD JUSTICE LEVESON: It's a separate body, it's the board</p> <p style="text-align: center;">Page 104</p>

<p>1 of the Press Association --</p> <p>2 A. It is a separate body.</p> <p>3 LORD JUSTICE LEVESON: -- a trust?</p> <p>4 A. It is a separate body. Three people sit on it, three</p> <p>5 distinguished journalists sit on it, and they provide</p> <p>6 their report, which they submit to our main board.</p> <p>7 LORD JUSTICE LEVESON: So that's entirely editorial,</p> <p>8 journalistic?</p> <p>9 A. They're not employed by the PA. They are -- one is --</p> <p>10 I think two of them are former newspaper editors, the</p> <p>11 other is a former distinguished BBC journalist.</p> <p>12 MS PATRY HOSKINS: You also tell us that journalists are all</p> <p>13 instructed to operate within the terms of the Editors'</p> <p>14 Code.</p> <p>15 A. Yes.</p> <p>16 Q. And also that everyone is meant to be alert to</p> <p>17 "unintentional breaches". What do you mean by</p> <p>18 "unintentional breaches"?</p> <p>19 A. From my experience, you find that most things that go</p> <p>20 wrong in editorial operations happen by accident. The</p> <p>21 story that you've been asked to scrutinise in depth is</p> <p>22 never the one that's going to land you in legal trouble.</p> <p>23 The one that lands you in legal trouble is the one that</p> <p>24 somehow slipped beneath the radar.</p> <p>25 (inaudible) the code, it is, as in most other</p> <p style="text-align: center;">Page 105</p>	<p>1 it. We cover a lot of showbusiness stories, we take</p> <p>2 a lot of pictures relating to showbusiness and shoot</p> <p>3 quite a lot of video as well.</p> <p>4 Q. Given the potential for the privacy of a celebrity to be</p> <p>5 invaded when such a story is obtained, has this</p> <p>6 presented any challenges in maintaining your high</p> <p>7 standards?</p> <p>8 A. I don't think that we've found that to be the case.</p> <p>9 Most of the stories, I suppose, that we do about</p> <p>10 celebrities, I mean most of the occasions that we run</p> <p>11 into celebrities are when they are making themselves</p> <p>12 available, so it may well be film premieres in</p> <p>13 Leicester Square, the sort of promotional work that they</p> <p>14 do when they have a book to sell or a film to promote or</p> <p>15 a TV programme to promote.</p> <p>16 Q. You say you don't run the type of stories which might</p> <p>17 lead to problems?</p> <p>18 A. We may follow them up if other people run them, but we</p> <p>19 are not usually the original source for them.</p> <p>20 Q. Can I ask you about photographs. Does the same</p> <p>21 principle apply to photographs as does with stories:</p> <p>22 someone should be able to use your photograph without</p> <p>23 having to make any further checks? Is that --</p> <p>24 A. That's right, yes.</p> <p>25 Q. Do you sell photographs of celebrities or is that the</p> <p style="text-align: center;">Page 107</p>
<p>1 newspapers rooms, you'd hope, the cornerstone of our</p> <p>2 journalism. All the staff have a copy of it. They're</p> <p>3 reminded about its existence -- when there are important</p> <p>4 adjudications issued by the PCC, we'll draw them to the</p> <p>5 attention of our staff so that they can learn any</p> <p>6 lessons that need to be learnt from that.</p> <p>7 More broadly, on a day-to-day basis, in addition</p> <p>8 to -- the people who work on our news desk and our</p> <p>9 picture desk would be expected to know how the code</p> <p>10 operates, but they'd also be expected to be aware of all</p> <p>11 the other legal pitfalls that editorial content can be</p> <p>12 prone to and to watch out for them and to try and make</p> <p>13 sure that we don't supply them to our customers.</p> <p>14 Q. We'll come onto some examples of unintentional breaches</p> <p>15 in a moment. Before I move away from stories, you may</p> <p>16 be aware that two witnesses from press agencies came to</p> <p>17 give evidence to this Inquiry back at the end of</p> <p>18 December, Mr Bell and Mr Johnson from NAPA. They</p> <p>19 suggested that there had been an increasing demand over</p> <p>20 the years for stories about celebrities and</p> <p>21 showbusiness. Has that been your experience?</p> <p>22 A. Yes, absolutely the case. There was a time, perhaps at</p> <p>23 the early part of my career at PA, where showbusiness</p> <p>24 wouldn't have featured very heavily in our output. Now</p> <p>25 we have several members of staff who are dedicated to</p> <p style="text-align: center;">Page 106</p>	<p>1 preserve of other specialist picture agencies?</p> <p>2 A. No, we do take pictures of celebrities. They're</p> <p>3 usually, as I say, taken in the sort of circumstances</p> <p>4 where they're making themselves available to be</p> <p>5 photographed.</p> <p>6 Q. Do you employ staff photographers?</p> <p>7 A. We do. Almost all of them -- sorry.</p> <p>8 Q. Almost all?</p> <p>9 A. Almost all of the stories that we run on the wire and</p> <p>10 almost all of the pictures that we run on the wire are</p> <p>11 taken by -- are written or taken by our own staff.</p> <p>12 Q. Do you ever purchase photographs from paparazzi or</p> <p>13 freelance photographers?</p> <p>14 A. Not that I'm aware of. We may buy some pictures from</p> <p>15 freelance photographers. I mean, that's in the nature</p> <p>16 of the sort of agency business. But the overwhelming</p> <p>17 majority of the material that we produce -- that we send</p> <p>18 to our customers, has been produced ourselves.</p> <p>19 Q. We've heard evidence from editors about the contacts</p> <p>20 that they have with agencies when they're purchasing</p> <p>21 a photograph. Is it your experience that editors will</p> <p>22 come to you and ask you about the circumstances in which</p> <p>23 a particular photograph of a celebrity was taken? For</p> <p>24 example, to ascertain whether or not that photograph was</p> <p>25 taken in a situation which might be considered to be</p> <p style="text-align: center;">Page 108</p>

<p>1 invading their privacy?</p> <p>2 A. Yes. That does happen, although I think people trust</p> <p>3 the PA to supply them with material that can be used</p> <p>4 without making any further checks. We do sometimes</p> <p>5 receive telephone calls from picture desks who will ask</p> <p>6 about the specific circumstances in which a picture may</p> <p>7 have been taken.</p> <p>8 For example, it might be a celebrity who has been</p> <p>9 photographed accompanied by their children. Before we</p> <p>10 put that picture out, we would ask those questions about</p> <p>11 the circumstances: was the celebrity content for their</p> <p>12 children to be photographed? How could we be sure about</p> <p>13 that? It might be someone walking through an airport</p> <p>14 accompanied by their children. We would then have to</p> <p>15 take a decision whether we had the consent or not, and</p> <p>16 then if we thought that we didn't, what we would</p> <p>17 actually do with the picture. It might well be that in</p> <p>18 any case we would pixelate the face of the children or</p> <p>19 we might edit the picture so the children aren't</p> <p>20 included in it.</p> <p>21 Q. Can I ask you about when things go wrong and a complaint</p> <p>22 is received. First of all, can you tell us roughly how</p> <p>23 many complaints you get a year, first of all through the</p> <p>24 PCC and, secondly, directly to you?</p> <p>25 A. It varies year by year, but I would say that in</p> <p style="text-align: center;">Page 109</p>	<p>1 a well-known problem in journalism -- where two people</p> <p>2 with the same name are -- one behaves in a way that</p> <p>3 brings him to adverse attention of the public and it's</p> <p>4 the other one who gets blamed. I think the original</p> <p>5 case was called Artemis Jones, but that goes back in my</p> <p>6 legal history.</p> <p>7 A. Yes. You're not going to talk about that?</p> <p>8 MS PATRY HOSKINS: That's what happened here, isn't it?</p> <p>9 A. Yes, that's right.</p> <p>10 Q. The story went out and it was obvious that you had just</p> <p>11 named -- the name was precisely the same, the same</p> <p>12 spelling, but you'd just got the wrong person?</p> <p>13 A. Yes. It's probably the gravest editorial error that the</p> <p>14 PA has made in the whole time that I've been there. We</p> <p>15 wrote a story about the wrong person. As soon as it was</p> <p>16 drawn to our attention, we corrected it, obviously</p> <p>17 apologised for it. I think in the subsequent settlement</p> <p>18 it was described as "an honest mistake".</p> <p>19 Q. Who described it as "an honest mistake"?</p> <p>20 A. I think that was the solicitor who was acting for the</p> <p>21 aggrieved party had described it as "an honest mistake".</p> <p>22 Q. Right.</p> <p>23 A. The error was made by a journalist who had been covering</p> <p>24 courts for us for about 30 years, was such a trusted and</p> <p>25 reliable member of staff that they actually trained</p> <p style="text-align: center;">Page 111</p>
<p>1 a typical year we might have between two and four</p> <p>2 complaints that would be referred to us by the PCC.</p> <p>3 Q. What about directly, people who just complain directly</p> <p>4 to you?</p> <p>5 A. Often they do. In many ways, we prefer people to</p> <p>6 contact us as soon as possible if -- people complain or</p> <p>7 make observations about different things. A spin</p> <p>8 doctor, for example, might call up to say he or she is</p> <p>9 unhappy with the tone that the story takes. We'll have</p> <p>10 a look at that, but we probably wouldn't necessarily do</p> <p>11 anything about changing it unless we felt that we had</p> <p>12 been unfair, in which case we recast the story.</p> <p>13 If someone contacts us because there's an inaccuracy</p> <p>14 in a story, then we want to take action to correct that</p> <p>15 as quickly as possible, because we take the view that</p> <p>16 the sooner we can correct the content, the less chance</p> <p>17 there is of it being used by one of our customers in</p> <p>18 a newspaper when we can stop it spreading too far online</p> <p>19 as well.</p> <p>20 Q. I want to ask you about one example when it did go badly</p> <p>21 wrong. That's tab 3 in the bundle that you have. I'll</p> <p>22 just explain to the chairman I'm not going to read out</p> <p>23 any names or refer to any facts, for obvious reasons.</p> <p>24 LORD JUSTICE LEVESON: This is -- I think we can probably</p> <p>25 take it quite shortly. This is a story -- it's</p> <p style="text-align: center;">Page 110</p>	<p>1 junior reporters in the arts of court reporting, and the</p> <p>2 reporter concerned was so ashamed by what they had done</p> <p>3 that they resigned.</p> <p>4 You always -- when you news edit or edit, you bear</p> <p>5 a thousand tiny scars of the mistakes that you've made,</p> <p>6 that's how you gain experience, but I think that this</p> <p>7 particular scar is still very red and painful as far as</p> <p>8 we're concerned, because it flew in the face of the most</p> <p>9 basic thing that we should do, which was to provide an</p> <p>10 accurate service.</p> <p>11 Q. Can I pick you up on one aspect of this particular</p> <p>12 story, which is this: you ended up having to pay this</p> <p>13 person a substantial sum in damages, but newspapers who</p> <p>14 had picked up the story, based on what you'd said, were</p> <p>15 also ordered to pay damages. Given what you said about</p> <p>16 the importance that you place on being able to put out</p> <p>17 a story that no one else has to check, did this error</p> <p>18 affect the relationship that you had with newspapers or</p> <p>19 other media organisations?</p> <p>20 A. Taken in the long run, no, because I think people</p> <p>21 studied the case, realised just that it was</p> <p>22 a catastrophic example of human error and not one that</p> <p>23 pointed to some systemic failure within the PA editorial</p> <p>24 operation. But of course we don't like to -- we felt</p> <p>25 terribly embarrassed and angry with ourselves that we</p> <p style="text-align: center;">Page 112</p>

<p>1 had put our customers in the position where they had 2 printed a really seriously inaccurate story.</p> <p>3 Q. Two short questions to ask you. The first is on the 4 issue of pooling. On the second page of your statement, 5 you explain the concept of pooling a story, essentially 6 a situation where it is agreed that the 7 Press Association will attend a particular event, say 8 a funeral, on behalf of the whole media, and then 9 provide one report and that's shared across various 10 media organisations. Can you tell us whether that's 11 a common occurrence and whether, in your view, it's 12 something that could be expanded more widely? The 13 reason I ask is I'm sure there will be people who would 14 say, "I'd love to have had just one reporter and one 15 photographer on my doorstep than the scrum that I had". 16 Is there any scope for expanding that?</p> <p>17 A. Just to explain a little bit about pooling, it is common 18 occurrence for the Press Association to provide pooled 19 words and pictures from an event. It might be a visit 20 by the prime minister to somewhere that has restricted 21 access. We provided pooled coverage of Prince Harry 22 when he was in Afghanistan. The PA reporter and 23 photographer went out and spent time with him, 24 representing the interests of all of the British media. 25 I think the point you're making is when ordinary Page 113</p>	<p>1 local weekly newspapers, for example, that don't 2 directly pay for the service would also -- we'd also 3 supply that to them.</p> <p>4 As to whether it could be more widely used, I guess 5 there would be the opportunity for pooling arrangements 6 to be used more widely. My only concern would be that 7 I wouldn't want the press' operations to be unduly 8 fettered because of that, you know, that it becomes the 9 norm that only one reporter or photographer can work on 10 any particular story. I mean, you know, media 11 organisations should have the freedom to be able to 12 cover stories in the way that they see fit.</p> <p>13 Q. My last question is about regulation. There's a short 14 section in your statement which deals with the 15 importance of self-regulation. Given the short time 16 that we had, I'm just going to throw the question open 17 to you. Is there anything that you would like to say 18 about regulation, either to praise the current system of 19 regulation in whatever form you see fit or whether -- or 20 perhaps you'd wish to say a few words as to some of the 21 options that have been discussed at this Inquiry, 22 whether you have any concerns or suggestions for the 23 future.</p> <p>24 LORD JUSTICE LEVESON: If this isn't a question you want to 25 cope with in two minutes, we can carry on later. Page 115</p>
<p>1 people get drawn into media attention, perhaps for 2 tragic reasons, maybe a member of their family has died 3 in tragic circumstances, and they find themselves the 4 focus of media attention, sometimes you have to say that 5 doesn't necessarily present a problem for them. They're 6 more than happy to speak to anyone who would like to 7 speak to them. But on other occasions, quite 8 understandably, they feel that concerted media attention 9 is intrusive, and although they would like to perhaps 10 make a statement about the member of their family, they 11 don't want to do it to all and sundry repeatedly; that's 12 when the pooling arrangement can be brought into play.</p> <p>13 The way that it works typically is that a PA 14 reporter and photographer will meet with the people 15 involved, will write a story, maybe take some pictures, 16 and then we'll supply that content to all of our 17 customers.</p> <p>18 In fact, we go further than that, because in those 19 circumstances, if you take on -- I don't know if it's 20 the privilege -- I suppose it's a privilege, to be able 21 to provide that service, there's also a responsibility 22 that the material is supplied as widely as possible, so 23 although we will provide those words and pictures to 24 our -- the customers who pay for the service, we'll also 25 supply them to any other media organisation, perhaps Page 114</p>	<p>1 A. I'm more than happy to deal with it in two minutes, but 2 I would like to say a word of praise for the Press 3 Complaints Commission. I think that the work that they 4 do in resolving complaints and mediating when complaints 5 are made is really worthwhile.</p> <p>6 LORD JUSTICE LEVESON: Do you think it's justifiable that 7 they don't take complaints from third parties?</p> <p>8 A. I think that is an area that perhaps would be something 9 that should change in the new system that will come -- 10 because clearly there will be a new system, and the -- 11 I think the flaw in the PCC's operations is actually 12 contained in its name: it's just involved in resolving 13 complaints, and I think where we are going is that 14 whatever replaces the PCC, or whether the PCC's 15 operations are expanded, will have to deal much more 16 with monitoring and maintaining editorial standards.</p> <p>17 MS PATRY HOSKINS: Is there anything you'd like to add?</p> <p>18 A. I don't think so.</p> <p>19 LORD JUSTICE LEVESON: Let me just ask a couple of things. 20 There is no doubt, as you say in your statement, that 21 the Inquiry will explore the actions of everybody in 22 relation to the phone-hacking incident. You ask the 23 Inquiry to consider the actions of the police and 24 politicians and the reasons why it took so long for the 25 full shocking story to emerge. One could equally ask Page 116</p>

<p>1 why it took so long for the press not to pick up on what                  2 was going on. The press, after all, hold everybody else                  3 to account for what they do, and properly so, but one of                  4 the issues of concern is the extent to which the press                  5 operate an -- albeit unstated -- agreement that they                  6 don't do it themselves.                  7 A. I wouldn't necessarily agree that that's the case --                  8 that that would be the case. I think all of us feel                  9 regret that this story wasn't pursued more vigorously                  10 some years ago. It is, however, difficult to pursue                  11 a story vigorously in the face of official denials that                  12 anything untoward has occurred, and that effectively is                  13 the situation as it was five years ago.                  14 I mean, the information that's coming out now has                  15 actually been available, it's been in official hands for                  16 several years. It's only now that it's actually coming                  17 out.                  18 LORD JUSTICE LEVESON: In any event, it's not just hacking,                  19 is it? If you've paid, as I'm sure you have, attention                  20 to the types of conduct and criticisms that have been                  21 made from that table over the last three months, it's                  22 rather wider than that, isn't it?                  23 A. I really don't know whether it's more. Yes, I imagine                  24 it is. You will draw your own conclusions regarding                  25 that, but I have no special knowledge, I have to say, as                  Page 117</p>	<p>1 imagined. Or: this is quite remarkable, nothing like                  2 this had ever come within my contemplation.                  3 A. I think it was the latter description, really, for most                  4 people who work in newsrooms around the country, and                  5 certainly the Press Association newsroom. Part of my                  6 job -- as part of my job, I visit our customers, which                  7 means I probably visit more newsrooms in a year than                  8 anyone else in the country --                  9 LORD JUSTICE LEVESON: It's actually why I was asking you                  10 the question.                  11 A. Everywhere that I go, I am tremendously impressed by the                  12 professionalism of the journalists involved and the                  13 everyday determination to adhere to high journalistic                  14 standards.                  15 LORD JUSTICE LEVESON: And you're talking essentially about                  16 the regional press?                  17 A. A large part of it would be the regional press, but                  18 together with my colleagues I visit national                  19 organisations as well.                  20 LORD JUSTICE LEVESON: I'm sure. The other question that                  21 I wanted to ask you was whether the way in which news is                  22 having to be gathered today, where local newspapers are                  23 clearly under financial pressure, is putting an                  24 additional burden on the Press Association to ensure                  25 that it retains local news as an important part of its                  Page 119</p>
<p>1 to the extent of it.                  2 LORD JUSTICE LEVESON: Actually, one of my responsibilities                  3 is to think about the customs, practices and ethics of                  4 the press. You've spent your life in the press,                  5 therefore put hacking to one side, put the interception                  6 of calls to one side and all the other criticisms that                  7 have been made, did they cause you surprise from your                  8 experience of the press?                  9 A. It certainly has caused me some surprise, and a great                  10 deal of concern. Look, I don't want to present the                  11 Press Association as any kind of paragon of journalistic                  12 virtue. I think from the questioning that we've had                  13 you've been able to prove very successfully that we                  14 definitely have feet of clay when it comes to making                  15 editorial mistakes, but I have to say that some of the                  16 evidence that I have heard during these hearings have                  17 represented things that are entirely alien to me as an                  18 agency journalist, and I would have thought that the                  19 journalists who work with me at the Press Association                  20 would equally be -- perhaps not surprised, but would be                  21 concerned about it.                  22 LORD JUSTICE LEVESON: Of that I have no doubt, but the                  23 state of mind I'm trying to drive at is: well, we were                  24 conscious that there were some things going on around                  25 the fringes; actually it sounds rather worse than we'd                  Page 118</p>	<p>1 remit.                  2 A. Yes. Providing news from across the country, both for                  3 customers to use at a national level but also for                  4 customers to use at a regional level, is very important                  5 to us. And I agree with you, the difficulties the                  6 regional press are -- in fact all of the press, but                  7 particularly the regional press are going through at the                  8 moment is a genuine cause for concern.                  9 LORD JUSTICE LEVESON: Are the Press Association doing more                  10 in the regions than they were or the same and we're just                  11 suffering a deficit of regional news?                  12 A. Our network of regional reporters, because when our                  13 customers suffer, we suffer as well, so our network of                  14 regional reporters is not as extensive as it would have                  15 been a few years ago, but we still maintain                  16 a substantial network of regional reporting staff and                  17 photographic staff, and providing news, as I say, from                  18 the regions for use at a national level and also                  19 sometimes by the regional media themselves, likewise the                  20 sort of service that we provide from here at the Royal                  21 Courts of Justice will resonate with national customers                  22 but also a lot of the stories that we do are of critical                  23 importance to regional customers as well.                  24 LORD JUSTICE LEVESON: All right. Thank you very much                  25 indeed. Thank you, Mr Grun.                  Page 120</p>

<p>1 A. Thank you.</p> <p>2 MS PATRY HOSKINS: Thank you, sir. That concludes the</p> <p>3 evidence for this morning, you'll be glad to hear.</p> <p>4 LORD JUSTICE LEVESON: Yes. We decided to conclude Mr Grun</p> <p>5 We'll start again at 2.15, if that's all right.</p> <p>6 I understand that at the very beginning of the</p> <p>7 morning, the audio feed failed. That was not as</p> <p>8 a consequence of anything that happened within the</p> <p>9 Inquiry or indeed as a consequence of the arrangements</p> <p>10 that were made for Mr Mahmood. I am sorry about it. It</p> <p>11 was beyond our control, but the audio feed for the first</p> <p>12 minutes that were missing will be available later today.</p> <p>13 Of course, the transcript, I think, is also available.</p> <p>14 Thank you.</p> <p>15 (1.10 pm)</p> <p>16 (The luncheon adjournment)</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 121</p>	

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