

<p>1 Tuesday, 29 November 2011 2 (10.00 am) 3 LORD JUSTICE LEVESON: Good morning. Yes, Mr Jay. 4 MR JAY: May it please you, sir, the first witness today is 5 Mr Richard Peppiatt, please. 6 MR RICHARD PEPPIATT (affirmed) 7 Questions from MR JAY 8 MR JAY: Mr Peppiatt, please make yourself comfortable. 9 I hope you have a bundle we prepared for you. I see 10 that you have. 11 A. I do indeed. 12 Q. In that bundle you will find, I trust, your 13 five-page witness statement which, for the transcribers, 14 starts at page 31032 -- I'm giving the last five 15 numbers -- and extends over five pages. The version 16 I have seen has not been signed but that doesn't matter. 17 Is this your evidence and do you formally attest to its 18 truth? 19 A. It is, yes. 20 Q. Can I ask you, please, some general questions to start 21 with in relation to your career as a journalist? 22 LORD JUSTICE LEVESON: Just before we do that, Mr Peppiatt, 23 you've also attended one of the seminars and contributed 24 to that, for which I'm grateful. That contained both 25 fact and opinion. Is that all true as well?</p> <p style="text-align: center;">Page 1</p>	<p>1 worked there on a full-time freelance basis for two 2 years. More than two years, really. 3 Q. Thank you, Mr Peppiatt. The documents show that your 4 NCTJ you obtained in February 2008 and that you worked 5 for the Mail on Sunday in the financial year 2008/2009. 6 We know that you resigned from the Daily Star, I think, 7 in March 2011; is that correct? 8 A. Yes. 9 Q. Can you remember approximately when you started to work 10 for them? 11 A. Well, it would be sort of two years previous to that, 12 I suppose. I suppose I left Ferrari -- it would 13 probably be February 2009, perhaps. Yeah, February 14 2009, probably. 15 Q. Can you explain, please, the basis on which you were 16 working for the Daily Star, sort of contractually? 17 A. I mean, I suppose it was a casual basis. You know, they 18 didn't have any obligation to give me work beyond 19 a week-to-week basis. However, many reporters in the 20 industry are employed on that basis. You have the 21 expectation that you will be working the next week. 22 There was a rota that runs for ten weeks at the Daily 23 Star at least, so you're not beginning the week 24 thinking: "Am I going to get work?" It is regular and, 25 as I said, it is typical within the industry that that</p> <p style="text-align: center;">Page 3</p>
<p>1 A. That is all true. 2 LORD JUSTICE LEVESON: Thank you very much. In that way, 3 I incorporate what you said there in what you're saying 4 to me now. 5 A. Sure. 6 LORD JUSTICE LEVESON: Thank you. 7 MR JAY: Sir, that's under tab 7. 8 LORD JUSTICE LEVESON: Yes, thank you. 9 MR JAY: I was going to come to that. 10 In your own words and perhaps starting at the 11 beginning of your journalistic career, could you briefly 12 take us through it, please, Mr Peppiatt? 13 A. I suppose my first sort of brush with journalism was 14 when I was living in Los Angeles. I did some sort of 15 bits and pieces for an agency called Splash News and 16 I came back to England, went to university and I did my 17 NCTJ, which is a journalism training course, and then 18 I came out of there and worked at the Mail on Sunday as 19 a freelance reporter. It ranged from sort of doing full 20 weeks to a day a week, sort of depending. That probably 21 went on for four, five months, perhaps. 22 And then I went to an agency called Ferrari Press 23 Agency, which is sort of a local news agency which 24 provides stuff for the national press and I worked there 25 for six months and then I went to the Daily Star and</p> <p style="text-align: center;">Page 2</p>	<p>1 occurs. 2 Q. Were you paid on a daily basis or some other basis? 3 A. I was given a day rate, and I was paid on a weekly basis 4 for that. 5 Q. You don't have to answer this question. Are you able to 6 tell us what that rate is or would you prefer not to? 7 A. No, no. £118 a day, and that was for an eight-hour day. 8 Any hours over that, you may get paid extra. I think it 9 went up to sort of £136 for nine hours, £140-something 10 for 10 and so forth. Anything over 12 hours was sort of 11 double pay. 12 Q. Were you paid bonuses for particular stories? 13 A. You would occasionally sort of get a bonus. It wasn't 14 sort of titled as such, but there would be discretionary 15 payments made at times, yes. 16 Q. Can I deal with issues of corporate governance at the 17 Daily Star, which you cover in the second paragraph of 18 your statement. You explain there was little or nothing 19 in the way of documents or official policies governing 20 conduct. Were you provided with a copy of the PCC code? 21 A. I was the day that the Desmond titles dropped out of the 22 PCC. I don't quite know why on that particular day they 23 were -- they were distributed, but that was the only 24 time that it was sort of left on the desk, so to speak. 25 There was nothing sort of said beyond it being handed</p> <p style="text-align: center;">Page 4</p>

<p>1 out, sort of referencing it, and certainly I never 2 signed an employment contract which had terms. You 3 know: "You must behave in X, Y, Z sort of manner." You 4 know, even the sort of dockets which I would fill out 5 for my payments, the terms of that were more to do with 6 copyright, et cetera, rather than how you should conduct 7 yourself. 8 Q. Do you have a view or insight as to with what level of 9 approbation or otherwise those at the Daily Star 10 regarded the PCC and its code? 11 A. Well, it was just not something that's brought up in 12 reference to stories. You know, there are certain sort 13 of implicit considerations. I say in my statement about 14 you don't go barging into hospitals, et cetera. It's 15 things that you sort of know from your training anyway, 16 but certainly there was never a discussion that 17 I remember of: "Can we run this story? How should we 18 run this story?" in reference to the PCC code itself. 19 And certainly the Daily Star had numerous run-ins with 20 the PCC while they were a member, and it was never sort 21 of referenced in a negative manner, sort of: "Oh, we are 22 deeply shamed"; it was just a shrug of the shoulders, 23 slap of the wrist, and then start again the next day. 24 I don't think it was held in esteem, certainly. 25 Q. Can I deal with the general issue of the drivers for Page 5</p>	<p>1 advertising departments than the newsroom floor." 2 You are now dealing with commercial drivers. Again, 3 in the same way as you did previously, could you 4 elaborate on that for us, please? 5 A. There's certain companies which advertise with the Daily 6 Star a lot. Certainly there was prominence given to 7 sort of PR stories which may be referenced to those 8 particular companies. I remember being sent out on 9 a particular job just -- I did a feature about M&S 10 skinny pants and it was because they were trying to get 11 an advertising contract, as I understood it, with Marks 12 & Spencers. There was no journalistic merit in this. 13 It involved me sort of posing for pictures in my pants. 14 You know, there was no merit in it. 15 So that was the advertising sort of driver, 16 I suppose. Sorry, what was the rest of the question? 17 Q. You've probably answered it. Editorial decisions 18 dictated more from the accounts and advertising -- 19 A. I'd add to that that they have phone lines sort of every 20 day in the paper, and certainly there are certain issues 21 which would come up which would elicit a lot of callers, 22 and that was seen as a good sort of barometer of what 23 was popular. This was -- leading up to my resignation, 24 there was a story about the English Defence League and 25 the story itself, you know, referenced the English Page 7</p>
<p>1 stories. One of the themes which came outlet of your 2 contributions to the seminars is that the story is 3 preordained and then the "facts" are finessed to meet 4 the story. Could you elaborate on that at a level of 5 generality? 6 A. Certainly. The Daily Star is a right-wing tabloid, so 7 they have an ideological perspective on certain issues, 8 say immigration or national security or policing. And 9 so whatever a story may be, you must try and adhere to 10 that ideological perspective. Say there is a government 11 report out giving statistics. Well, you know, any 12 statistics which don't fit within that framework you 13 ignore or sort of decontextualise and pick maybe the one 14 statistic which does. If there's something that comes 15 out saying crime has gone down, you then go look for the 16 statistic which says knife crime has gone up 20 per cent 17 but the rest of crime -- well, we'll just focus on knife 18 crime. Because there is an overwhelming negativity and 19 it runs throughout the tabloid press. You know, a story 20 is simply not a story unless it's knocking someone, or 21 knocking an organisation or knocking an ethnic group, 22 whatever it may be. 23 Q. You say as well editorial decisions -- this is in the 24 third paragraph, fourth line: 25 "... are dictated more from the accounts and Page 6</p>	<p>1 Defence League but it wasn't about the English Defence 2 League itself, but a sort of phone line was set up 3 saying, "Do you agree with the EDL's policies?" 4 Now, there were no EDL policies in the story but 5 99 per cent of people calling back said they did, and 6 this was sort of 2,000 callers. Now, that was a lot for 7 the Daily Star because there were days when it was less 8 than 10 callers ever called up so, that was sort of: 9 "Right, we need to have more of these stories." So it 10 was more of a sort of financial decision -- "This will 11 sell us more papers if we keep sort of banging this 12 drum" -- than it was a journalistic one. 13 Q. Thank you. You say at the bottom of the first page, 14 that private investigators were not routinely employed 15 to your knowledge. You give one possible example at the 16 top of the second page. Could you assist us with that, 17 please, Mr Peppiatt? 18 A. There was a rumour that Stephen Gerrard had got 19 a 16-year-old pregnant, which completely turned out to 20 be untrue, I'll say, but I was sent up to Liverpool to 21 find out whether there was any veracity to this and 22 I needed some help finding addresses of some names that 23 were floating around on message boards, et cetera, and 24 I called up a senior person and said, "Look, this is the 25 name. Can you -- is there anything you can do to help?" Page 8</p>

<p>1 And they came back with a list of addresses, a list of 2 phone numbers to call. 3 Now, as I say in my statement, there's not 4 necessarily anything illegal on that. I did look myself 5 on TraceSmart, which is sort of a database which 6 journalists use. It's electoral registers and things 7 like that. If you ever don't tick the box, you may end 8 up on the TraceSmart register. 9 This was in addition to that, these particular 10 addresses. That was the only instance that I sort of 11 had a thought: "Well, I wonder where that's come from?" 12 But certainly I would say that the Daily Star did not 13 really use private investigators and I don't think that 14 was so much some sort of ethical decision as a financial 15 one. Their budget is significantly smaller than some of 16 their rivals and often they're quite happy just to 17 follow up other people's news rather than sort of be too 18 bothered about actually getting genuine exclusives 19 themselves. You know, it's expensive to get private 20 investigators, et cetera. I just don't think there was 21 the money for it. 22 Q. You take this up about ten lines down the second page. 23 I'll read this out: 24 "The majority of stories appearing in the Daily Star 25 are sourced from the news wires or plagiarised from Page 9</p>	<p>1 is -- as I said to the seminars, it's ideologically 2 driven and it is impact-driven. That's the most 3 important thing. You know, how is the most aggressive 4 way we can frame this story to try and sensationalise 5 and sell our paper? 6 Q. You deal with other sources in the self-same 7 paragraph of your statement. Can I deal with the issue 8 of news agencies or agency reporters and the point you 9 make that there is, you say, an obvious financial 10 incentive in making your stories stand out from the 11 crowd, so the pressure or temptation is to spin or 12 embellish a story. Are you saying that that occurs in 13 relation to what news agencies do? 14 A. First of all, news agencies play a vital role in our 15 sort of media landscape or press landscape, because they 16 are sort of located in sort of far-flung regions, some 17 of them, that staff reporters from newspapers aren't 18 covering. They often pick up the local papers, they'll 19 find stories that may be of interest to the national 20 press, but they're under a great deal of pressure. You 21 know, every year lots of them go out of business, and 22 obviously certain big stories will attract numerous sort 23 of agencies or -- agencies are under pressure to get 24 their stories noticed. It comes through the news wires 25 to the newspapers -- the national newspaper desks as Page 11</p>
<p>1 other newspapers, particularly the Daily Mail, which is 2 such a heavy influence that for the most part it 3 dictated the Daily Star's news agenda." 4 Do you have any evidence of that, Mr Peppiatt? 5 A. I do, yeah. I mean, if you -- I suppose clearly any 6 journalist who reads the Daily Star can tell a lot of 7 the stuff tends to be from the Daily Mail the day before 8 and put on their website. The same line will be taken 9 on the stories. This is a -- you know, this has 10 consequences, because the Daily Mail don't always get 11 things right, but certainly "If the Daily Mail say it, 12 therefore it's good enough for us" was very much the 13 sort of line taken. 14 So as a journalist, you know, if I see a Daily Mail 15 story I've been given to rewrite in Daily Star style, 16 you know, for me to then research where they've got 17 their information, and if I find out that in fact that 18 information has been distorted or is inaccurate, for me 19 to then approach the news desk and say, "Actually, I've 20 found out this Daily Mail story is just not standing 21 up", you'd be sort of kicked back to your seat fairly 22 robustly. You know, that's not the point. This is, you 23 know: the Daily Mail said it; write it. 24 This is not a truth-seeking enterprise. Much of 25 tabloid journalism is not truth-seeking primarily. It Page 10</p>	<p>1 just a stream of stories. 2 Now, you want to get yours noticed and get yours in 3 the paper because you don't get paid otherwise, so 4 obviously there are occasions when the temptation is 5 there to maybe give things a bit of extra spin. And 6 once it's been spun, it will often arrive at the 7 reporter of the newspaper's desk, who is then encouraged 8 to give it an extra spin, and before you know it, then 9 the subs get hold of it and it's given a bit more spin, 10 and then the news desk gets -- you know, it gets through 11 to the -- and they might give it an extra spin on the 12 news and before you know it, the story which the agency 13 has filed bears very little similarity to what you 14 started with. You know, everyone sort of adds their 15 little impression to it. 16 Q. Yes. I suppose you really are left with a googly rather 17 than a straight ball. 18 A. Indeed. Indeed. 19 Q. Can I ask about the role of PR, please. This is another 20 theme which you touch on in the top paragraph on page 2 21 but then elaborate on the second paragraph. In the same 22 way as you've done in relation to the news agencies 23 helpfully, could you help us, please, with the role of 24 PR agencies? 25 A. Particularly in the tabloid market -- and not alone; Page 12</p>

<p>1 it's throughout the media really -- PR is a huge 2 influence, a huge influence. There are more PRs than 3 there are journalists. You get into your inbox every 4 day dozens upon dozens upon dozens of press releases 5 from various companies all trying to get in the paper, 6 get their brand mentioned, and they will incentivise 7 this for you. I say in my statement that in two years 8 I went on four free holidays, you know, from PR 9 companies in order to sort of give their stories an 10 extra push. I was not alone in this, and certainly the 11 higher up the chain you were, the greater the incentives 12 that may be offered.</p> <p>13 The thing about PR stories is they will often come 14 in the form of, say -- I'll give you an example: more 15 Brits than ever are holidaying in the Mediterranean this 16 year. 45 per cent of everyone in Britain who is going 17 on holiday is going to go to the Mediterranean, 18 20 per cent are going to America, you know, 1 per cent 19 is going to Australia.</p> <p>20 Now, that will then be represented as a new story. 21 It will be -- you'll get the name of, say, Travelocity, 22 a website, into that story to get their brand mentioned, 23 but the veracity of where that survey has come from -- 24 is it representative, how many people were asked -- are 25 simply not questions you're encouraged to ask. You</p> <p style="text-align: center;">Page 13</p>	<p>1 incentive, people go: "Maybe I should ham this up 2 a bit." You know, that's probably what people do, and 3 yet again they probably give you a selective version of 4 events and then the reporter themselves gives that a bit 5 of a spin and yet again, we're in the same process of it 6 moves up the chain, getting an extra spin and an extra 7 spin.</p> <p>8 Don't think that just because a reporter's name is 9 on top of a story they necessarily have anything like 10 the last word on how it turns out. I mean, I would say 11 less than -- you know, less than half the time any story 12 that my name was -- it would have been changed to some 13 degree or other and sometimes to quite a large extent. 14 Sometimes, you know, the single line which you thought 15 was vital because that gave it sort of maybe just a -- 16 just held it on the right side of accuracy or truth, is 17 removed because maybe the subeditor doesn't actually 18 know the full story, they're just seeing the copy and 19 they need to fit it within that space and they think: 20 "That's superfluous, get rid of it." So sometimes you 21 would cringe. You would read what -- and you'd go: 22 "That was a bad line to take out", but it's too late.</p> <p>23 Q. You've covered a range of source material, if one can 24 fairly describe it as such. What about the role of 25 investigative reporting at the Star. You use the term</p> <p style="text-align: center;">Page 15</p>
<p>1 know, you just take it at face value: "Yeah, I'm sure 2 that will do for us." Because as I say, it's not about 3 necessarily finding the truth of something; it's simply 4 sort of filling the hole.</p> <p>5 Q. Another source you mentioned -- this may or may not be 6 unremarkable: stories obtained from phone-ins or emails 7 from the public?</p> <p>8 A. Yeah.</p> <p>9 Q. Are members of the public or were members of the public 10 paid for the information they gave?</p> <p>11 A. Almost always, yes. You know, there are sort of -- in 12 all tabloids, there's what we call a "come on", which 13 is -- it will say, "We pay for tips and information", 14 and a phone number to call. And certainly you'd have 15 members of the public call up. Most of the time it was 16 rubbish. There would be occasions when a good story 17 would come through, and often one of the first questions 18 that you'd be asked is: "How much can I get for this?" 19 As a reporter, you don't like to commit too early and 20 you try and sort of get the story out of them first. 21 But certainly logic dictates that when people are 22 calling up saying, "How much will this make?" and your 23 response is often: "It depends where in the paper it 24 is -- if it's a front page, it pays a lot more than 25 page 26", the minute you introduce that financial</p> <p style="text-align: center;">Page 14</p>	<p>1 "traditional" in inverted commas. Is much of that going 2 on?</p> <p>3 A. Not as much as should be. It's a fairly desk-bound job. 4 It's probably -- I suppose there is this preconception 5 of journalists out and about, meeting contacts and sort 6 of -- it's simply not really true these days. It is 7 a very desk-bound -- you're on your computer most of the 8 time, and as I said, for the Daily Star, they were happy 9 to follow up other people's. When I say as well the 10 editorial agenda being decided from the accounts 11 department, this plays into it, because it's a lot more 12 expensive to put a reporter on a story for days on end 13 investigating and trying to get to the -- to the truth 14 of something, than it is just to make a knee-jerk 15 judgment, embellish a few source quotes, take a punt in 16 the dark and move on to your next story. Because, you 17 know, there are certain days you'd have eight, nine 18 stories to do in eight hours. You can't investigate 19 anything properly in that time. You'd just -- you're 20 forced to just rely on whatever's in front of you and 21 make a lot of assumptions and that's pretty much it.</p> <p>22 Q. In the middle of the third page of your statement, 23 31034, you deal with a phenomenon of the overplayed 24 headline. You give one example from the Daily Star: 25 "TV Cowell is 'dead'."</p> <p style="text-align: center;">Page 16</p>

<p>1 We know he's alive and well. The point you're 2 making there is the story was about him leaving the 3 X Factor, I think; is that right? 4 A. Yes, it was. I can give you a few others, if you like, 5 which -- I thought you may ask this question. It 6 depends how long you've got. 7 Q. If you could keep it to the Daily Star and give us three 8 other good examples, please. 9 A. "Chile mine to open as theme park", "Angelina Jolie to 10 play Susan Boyle in film", "Bubbles to give evidence at 11 Jacko trial" -- that's his monkey -- "Jade's back in Big 12 Brother" -- she was dead at the time. Obviously we have 13 the likes of "Maddie's body stored in freezer", which 14 we've heard already. "Grand Theft Auto Rothbury" -- that 15 was the Raoul Moat killing. There was going to be 16 a computer game based around it. Completely untrue. 17 "Brittany Murphy killed by swine flu" -- wasn't the 18 case. "Macca versus Mucka on ice", which was Paul 19 McCartney and his ex-wife were apparently going to 20 showdown on Dancing on Ice. Never transpired. 21 Then we have the likes of "Muslim-only public loos", 22 which in my letter I raise. Completely untrue as well. 23 LORD JUSTICE LEVESON: All these are real headlines? 24 A. These are real headlines. Yes, I know. 25 MR JAY: The Muslim-only public loo story, which you do Page 17</p>	<p>1 that the next day, it should have been an apology 2 printed, not another front page gloating about our 3 success in stopping these toilets, is kind of 4 a pertinent point, I suppose. 5 Q. You mention the PCC. It is right to say that there was 6 a complaint brought by Mr Adam Sheppard against the 7 Daily Star under clause 1 of the code, the accuracy 8 provision, and the PCC upheld it on 27 September 2010. 9 The relevant document I'm handing in. (Handed) 10 LORD JUSTICE LEVESON: Thank you. 11 MR JAY: You've seen it, Mr Peppiatt. 12 A. I had a glance this morning. I very quickly had 13 a glance, yeah. 14 Q. We needn't dwell on it inasmuch as the facts as you've 15 given to us are vouched by what the PCC say. 16 A. Certainly. I mean I'm surprised they did actually 17 uphold an adjudication, because one of the big issues 18 about the PCC is they won't take third-party complaints. 19 They say that only people directly affected can 20 complain. 21 Now, they say not always now, but I know people who 22 have tried to complain over accuracy and they say, 23 "Sorry, you're not directly affected." In this case, 24 I don't know why they decided to take a third-party 25 complaint, but it's certainly a massive flaw in the PCC, Page 19</p>
<p>1 specifically refer to, that was a piece you wrote; is 2 that right, Mr Peppiatt? 3 A. I wrote the follow-up piece the next day. It was 4 a front-page story the first day. The next day I was 5 tasked with writing a follow-up piece which was saying 6 that we'd managed to block these toilets being built. 7 Yet again, a front-page story. The fact that these 8 toilets were never going to be built as declared in the 9 first place was irrelevant. We were -- we'd blocked 10 something that was never going to happen and we knew 11 that, but we thought we'd turn it into somehow a Daily 12 Star campaign success. You know, it certainly wasn't 13 the case. 14 Obviously on the day that the first story was 15 written, it was very clear that these toilets were not 16 tax-payer funded. They were not Muslim-only. Anyone 17 could use them. There was going to be a single squat 18 toilet in a block of about 12 in a private shopping 19 centre in Rochdale. The council had made great efforts 20 to explain to us these terms but it had already been 21 decided by the senior editors that this was going to be 22 a front-page story and so it was. It was one of the few 23 times that the PCC stepped in to this sort of thing, but 24 it was typical. I mean, this is just one example. The 25 PCC did step in, an apology was printed, but the fact is Page 18</p>	<p>1 that anyone can't complain. If you're offended, you 2 know, as a Muslim about that story, you'll probably be 3 told: "Sorry, I don't see how it affects you directly", 4 and I think that's pretty disgraceful, really. 5 Q. The complaint, we can infer, came from a concerned 6 member of the public, although we don't know the 7 identity of the individual named. 8 Can I ask you, please, about the bottom of the third 9 page of your statement, our page 31034. 10 LORD JUSTICE LEVESON: Actually, we do know a name. 11 MR JAY: We have his name. 12 LORD JUSTICE LEVESON: We also know that he didn't represent 13 the council or the Exchange Centre. 14 MR JAY: Yes. I draw the inference he's just a concerned 15 member of the public, but that may or may not be right. 16 A. He may. I don't know, to be honest, no. 17 While we're on this topic, may I just add that, you 18 know, in recent months we've had Big Brother and we've 19 had the Health Lottery launched by the Desmond group, 20 and there has been overwhelming coverage. I think 21 within the first two weeks of August, there were 40 22 stories printed about Big Brother and the Health Lottery 23 dominated the front pages of both the Star and the 24 Express for days and days and days. This is purely 25 advertising their own product and is not about Page 20</p>

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<p>1 journalism, just while we're talking about that sort of 2 topic.</p> <p>3 Q. Thank you. The bottom of page 31034. This is the Matt 4 Lucas story. Can you just tell us a little bit about 5 that, please, Mr Peppiatt?</p> <p>6 A. Matt Lucas' ex-husband -- I think they were the first 7 couple to marry as a gay couple, but they separated some 8 time after -- he committed suicide, which was certainly 9 a tabloid sort of story. On that day, we got 10 a phonecall through to the news desk from a member of 11 the public saying he had information about Luke McGee -- 12 sorry, that was the gentleman's name -- and this call 13 was passed to me and I noted down what he was saying, 14 which were quite sort of sensational claims about that 15 he'd spent a lot of money on alcohol and drugs in the 16 lead-up to his death, millions of pounds he'd sort of 17 blown, and I sort of said to him, "Can we meet up?" He 18 said he was out of town. I said, "What proof can you 19 give -- how do I know that you're not just sort of 20 making this up?" He said, "I can't meet you, you'll 21 just have to take my word for it", you know, that sort 22 of thing. And I was sort of, "I'll pass it on to the 23 news desk", because that's what you do.</p> <p>24 So I sort of wrote down what he'd said, I passed it 25 on to the news desk and they said, "Write it up", and</p> <p style="text-align: center;">Page 21</p>	<p>1 reporting and I mentioned to you already that the 2 workload was sometimes quite overwhelming. There being 3 one particular day, there was just myself and two other 4 reporters to write the whole paper and we had to use 5 sort of pseudonyms to make it appear there was more of 6 us. One pseudonym often used is Laura Neil. The other 7 is Jack Bellamy. They just don't exist. So to make it 8 appear to other people that there's more of us in there 9 writing these stories, we used pseudonyms, and yet again 10 this is not conducive to good journalism. You simply 11 cannot do a job properly. It's -- I think Nick Davies 12 will probably talk more about this, but churnalism is 13 what it is.</p> <p>14 Q. We know you resigned from the Daily Star because you've 15 told us, and indeed you wrote an open letter to 16 Mr Desmond which was published in the Guardian; is that 17 right? It's under our tab 5.</p> <p>18 A. That's true, yeah.</p> <p>19 MR JAY: Sir, in your bundle, page 3 is missing. I'm going 20 to hand it up.</p> <p>21 LORD JUSTICE LEVESON: Thank you. I think I have one now.</p> <p>22 MR JAY: Thank you. Did you ever get a reply from 23 Mr Desmond?</p> <p>24 A. I'm still waiting.</p> <p>25 Q. You say a number of things in the letter, some of which</p> <p style="text-align: center;">Page 23</p>
<p>1 I said, "Surely I need to meet the man first, you know, 2 we don't know that --" and it was just, "Write it up."</p> <p>3 So there was a front-page story about him spending 4 a lot of money on drugs before his death. You know, 5 I think that there was certainly the consideration that 6 the man is dead, therefore you can't really libel him.</p> <p>7 Q. But there was litigation over the story?</p> <p>8 A. There was. That was breach of privacy, I think, from 9 Matt Lucas himself. But it wasn't -- but, you see, it 10 wasn't actually Luke McGee's family, Luke McGee being 11 dead. You can say pretty much what you want about him 12 because he's dead. That was the slightly callous 13 perspective that was taken and I'd like to apologise to 14 Luke McGee's familiar because I'm not -- you know, 15 I accept responsibility for the fact that no one held 16 a gun to my head and made me write that and the next day 17 another hurtful story too, and I feel very, very 18 ashamed.</p> <p>19 Q. Thank you. You deal with a wider point in the middle of 20 the next page, 31035, but it's one you've in part 21 developed already: the number of reporters, indeed the 22 paucity of reporters on the Daily Star. Could you 23 comment on that for us, please, and elaborate a little 24 bit?</p> <p>25 A. Yeah. When I said -- you mentioned about investigative</p> <p style="text-align: center;">Page 22</p>	<p>1 you've given in evidence today, so we needn't repeat 2 them. For example, the EDL story, the Muslim lavatory 3 story. What about on the second page? This sounds 4 a bit flippant, the proposal to Susan Boyle. What was 5 that about, the mock proposal to Susan Boyle?</p> <p>6 A. I suppose it is of interest because it's sort of -- it's 7 been interesting for me and very difficult, I'd say, as 8 well, over the last week, hearing celebrities and sort 9 of members of the public come up and talk about their 10 privacy being invaded, being harassed. You know, to 11 hear it from that perspective, you know -- there is very 12 much -- I think you caricature people and you make them 13 not so much human beings as just your target on a story, 14 and certainly it hammers home -- I think it's a very 15 hard-nosed reporter on Fleet Street who can't recognise 16 that sometimes the treatment is not humane, and I think 17 that Susan Boyle is a good example of probably when 18 I overstepped the mark with harassment.</p> <p>19 I was sent up to -- she was on X Factor and she was 20 finding the pressure, you know, quite overwhelming. 21 I think she has some sort of learning difficulties as 22 well, and she was certainly not prepared for the sort of 23 huge media interest surrounding her and she was finding 24 it very difficult, was at times acting in a slightly 25 bizarre manner, and often this was with provocation from</p> <p style="text-align: center;">Page 24</p>

6 (Pages 21 to 24)

<p>1 reporters and photographers. She was lashing out. She 2 was saying things. X Factor decided to put her into 3 hiding in Scotland to try and cool things down a bit, 4 and the press were told to stay away, just leave her be. 5 But this was a bit like a red rag to a bull for the 6 Daily Star, and I was sent up to Scotland to try and 7 find her, and was told to go and buy a kilt and a ring 8 and some roses and try and propose to her. 9 So I spent the next week pursuing her around 10 Scotland. 11 Q. Did it culminate in a mock proposal? 12 A. It did. 13 Q. Did that cause her -- what was her reaction, in 14 a nutshell? 15 A. "Piss off." Excuse my language, but that was exactly 16 what she said. But I mean, yeah, it was certainly not 17 very sensitively done, let's just say that, because 18 a lot was made of -- 19 LORD JUSTICE LEVESON: I'm not sure the word "sensitive" 20 fits into that story at all. 21 A. No, and certainly because this woman was unmarried, she 22 was -- you know, she was allegedly a virgin, a big play 23 of was made of this aspect of her life. It certainly 24 wasn't very sensitively done. Yet again, I can only 25 apologise for my part in that.</p> <p style="text-align: center;">Page 25</p>	<p>1 about an attractive female. They're quirky stories. 2 And the news desk had had absolutely no luck all day 3 finding anything of this ilk which would fit, and so the 4 news editor of the day came over and said, "Right, 5 anyone, I don't care what it is, first person to give me 6 a page 3 story, 150 quid", and I came up with that. 7 And I mean, the thing about someone like Kelly Brook 8 is -- the story itself, it's not damaging to her 9 reputation. It's quite in the public domain that she 10 is -- takes a while to get ready. She's spoken about 11 this openly. She's someone who tends to take -- you 12 know, tabloid stories about her she tends to just 13 ignore, and you know this as a reporter, that she's not 14 litigious, and you know it's the sort of story she'd 15 probably laugh off. 16 There are frequent stories which aren't really 17 knocking stories, that are just fictitious, that 18 a celebrity wouldn't think it was worth pursuing 19 a lawsuit over because where's the damage? You know, 20 you've spoken about the fact that you take a long time 21 to get ready, or, as we've heard many times, afterwards: 22 "We made a mistake but it was done in good faith." 23 Well, no, it's simply playing the game and walking that 24 sort of tightrope of: what can we get away with? 25 I think in my evidence to you I mention the sort of</p> <p style="text-align: center;">Page 27</p>
<p>1 MR JAY: It's a banal point, but do you have the right TV 2 show? Wasn't it Britain's Got Talent? 3 A. Sorry, it's Britain's Got Talent. You can see that I've 4 been out of the game for a bit. 5 Q. Well, I'll say nothing more about that. The Kelly Brook 6 interview and the story about the therapist which you 7 deal with. Was that a made-up story? It's a hypnotist, 8 not a hypnotherapist. 9 A. Yes, it was completely made up. Shall I explain, you 10 know, I suppose the process of which I came up with that 11 story? 12 Q. Yes. 13 A. It may be of interest to you. 14 Q. It is in the bundle we have. It's the penultimate 15 page of tab 8, the story itself. 16 LORD JUSTICE LEVESON: Thank you. 17 MR JAY: But just tell us a little bit about that, 18 Mr Peppiatt. 19 A. It was a Sunday afternoon, very late in -- very late, 20 about 6 o'clock, and sort of 6 o'clock on a Sunday is -- 21 certainly everyone's looking to get out the office and 22 go home, and we at the Daily Star didn't have a page 3 23 story. 24 Now, page 3 stories are a very particular type. 25 They tend to have to be quite funny. They like ones</p> <p style="text-align: center;">Page 26</p>	<p>1 difference between sort of a legal sense of truth and 2 a moral one. I think it's an important distinction. 3 Q. Yes, tell us about that, please. 4 A. The legal sense of truth is sort of: what can we get 5 away with saying? That's sort of the legal sense. The 6 moral sense would be more: what would be a fair way to 7 represent this? What would be an accurate way to 8 represent this? 9 Now, tabloid newspapers have no interest in the 10 moral sense. All they want to do is think: what can we 11 get away with saying? How far with we push the 12 boundaries and get away with it? As you see when you 13 have these monsterings of people, it's sort of: how far 14 with we push it? If one newspaper pushes the line, 15 everyone rushes to fill the void behind them. It's just 16 a matter of: what can we get away with saying? There's 17 no consideration of: what are the ethics? What are the 18 moral considerations? I'm sure I'll be lambasted by 19 some tabloid editors for saying that, but I'm sick of 20 them stepping forward and going: "Moral considerations 21 are at the forefront of our mind", because they're 22 certainly not. 23 Q. At the end of this open letter, the Guardian prints 24 a statement from the Daily Star. It's 02122 on our 25 numbering. They say this:</p> <p style="text-align: center;">Page 28</p>

<p>1 "Richard Peppiatt worked purely as a casual reporter 2 at the Daily Star for almost two years." 3 Do you agree with that? 4 A. No. Well, other than the "almost two years". If you 5 check my first byline and my last byline, it strings out 6 well over two years, but anyway, I'll let them off. 7 They're not great with accuracy. 8 Q. "Recently he became unhappy after he was passed over for 9 several staff positions." 10 Is that right? 11 A. No. Would you like me to explain why that's not right? 12 Q. Yes. 13 A. Certainly anyone who knows me, at that time I was very, 14 very down. I was very much looking -- my eyes were 15 firmly on the door. I was very unhappy in my job. The 16 idea that I would have wanted a staff job there is very 17 preposterous to anyone who knows me. Staff jobs do 18 occasionally come up and it was given to a fellow 19 reporter, but it tends to be that whoever's been there 20 longest gets the staff position that came up. Now, 21 I was three or four down the line. I would never have 22 expected a staff job and this particular girl had been 23 forced for a good six months, on a daily basis, to make 24 up stories about Jordan or come up with lines about 25 Jordan. They weren't all untrue, but a lot of them were</p> <p style="text-align: center;">Page 29</p>	<p>1 But of course, those questions don't get asked. 2 I mean, lots of tabloid stories where you will not see 3 a single name attached to them because they're pretty 4 much made up or based on such scant speculative 5 information as to be essentially untrue. 6 And to me, the net effect on the person who is the 7 subject of that story is the same. Whether it's 8 completely plucked out of the air or is based on 9 a caller calling in with a bit of information and you 10 think, "Oh, stick it in the paper, I'm sure it's true", 11 doesn't make any difference to the subject of that 12 story. They still read it and as we've seen in the last 13 week, it upsets them, it causes issues. You know, where 14 has this come from? Is it from my friends? Those 15 weren't considerations that I ever had when I was 16 a tabloid reporter, and much to my detriment I didn't 17 think like that. 18 Q. The statement continues: 19 "Since he wrote his email, we have discovered that 20 he was privately warned very recently by senior 21 reporters on the paper after suggesting he would make up 22 quotes." 23 Is that true? 24 A. No, not at all, and I welcome them to provide any 25 evidence whatsoever that that is the case. As with the</p> <p style="text-align: center;">Page 31</p>
<p>1 very heavily spun indeed and that culminated in Katie 2 Price turning around on Twitter and accusing her of 3 having an STD, which saw a backlash of abuse. She was 4 very, very upset that she was getting so much abuse 5 online and she was ready to quit, and it was sort of 6 a peace offering from the paper to give her a staff 7 position. 8 The idea that I somehow was unhappy about that -- 9 you know, the woman deserved that staff job very much 10 indeed. 11 Q. Thank you, and then the statement continues: 12 "He refers to a Kelly Brook story. In fact, he 13 approached and offered the newspaper that story, vouched 14 for its accuracy and then asked for and received an 15 extra freelance fee for doing so." 16 Is that right? 17 A. No. Certainly not. For the reasons I've just explained 18 to you, the editor was fully aware that this story was 19 cock and bull, and -- I mean, look at the story itself. 20 There's not a single named source in it. You know, any 21 sort of -- you know, this is a -- in the whole thing, 22 there's not a single named source at all, and if you 23 were a news editor who was trying to do their job 24 thoroughly, you would say, "Well, who is your source? 25 Why is there no one backing this up officially?"</p> <p style="text-align: center;">Page 30</p>	<p>1 last thing, if they can provide evidence of me applying 2 for a job or being offered to apply for a job or me 3 showing interest in a job, I welcome that. I equally 4 welcome any documents that show that I was warned about 5 anything. I mean, I probably have been warned about 6 making up quotes, but probably not good enough ones. 7 Q. I continue: 8 "Regarding the allegations over the paper's coverage 9 of Islam, he was only ever involved in a very minor way 10 with such articles and never voiced either privately or 11 officially any disquiet over the tone of the coverage." 12 Is that right? 13 A. No, not at all. I mean, I think at last count there 14 were something like 15, 16 stories that I use now when 15 I do talks and lectures, you know, that I wrote 16 involving -- you know, Muslim-bashing stories is what 17 I would call them -- which I analyse with students. 18 I don't know what they think a minor way is, but no, 19 it's certainly not true, and as for did I express 20 disquiet, I certainly did towards the end when I was 21 very much sort of really disheartened with what was 22 going on, but about a year beforehand, there had been 23 a casual reporter like myself who had expressed disquiet 24 over the tone of the coverage and because she did that, 25 she was given every anti-Muslim, every anti-immigrant</p> <p style="text-align: center;">Page 32</p>

<p>1 story to write from then on for about two weeks until it 2 became so much that she quit, and that was the -- you 3 know, it certainly deterred me, and I am -- you know, 4 certainly to this day, I am deeply ashamed of myself 5 that I didn't walk out the door with her but instead 6 I stuck my head down and thought: "I don't want to end 7 up like that, I can't afford to be." 8 That's the atmosphere. You toe the line or you get 9 punished. It's not an open dialogue. "You write what 10 we tell you, how we tell you to write it." We have in 11 the morning a news list and the news list is the stories 12 which they want to put in the paper that day, and they 13 have two or three lines -- the first two or three lines 14 of what they want the story to be. That is handed to 15 you and you write that. 16 Now, by that point, you've probably not even seen 17 anything to do with this story. The first you know of 18 it, you've been dictated: "This is the story that we 19 want." And your job is not to then turn around and go: 20 "Actually, I have investigated it and it's not quite 21 true"; you would be, you know, told off for that, and 22 certainly if you repeated it, you would be out the door 23 pretty quickly. Your job is simply to write the story 24 how they want it written. 25 I mean, I suppose maybe -- do you want me to mention</p> <p style="text-align: center;">Page 33</p>	<p>1 line, and then you need to get some sort of official 2 quote. So then I called up Inderjit Singh, director of 3 the Network of Sikh Organisations and said to him: 4 "We've been hearing that Muslims are planning on 5 disguising themselves as Sikhs. What do you think of 6 this?" So you add this veneer of legitimacy by getting 7 a quote off someone by telling them something that you 8 know is probably not true, but then you've got your 9 story. 10 That, as I said, is not a truth-seeking exercise. 11 It's an impact-seeking exercise. The spectre of having 12 a story that lashed out at both Sikhs and Muslims at 13 once was far too good to pass over. 14 LORD JUSTICE LEVESON: Can we just look at this for 15 a moment, Mr Peppiatt. You talked about some parts of 16 it being made up. So the line, you say, from the 17 Telegraph that there was a fear of it comes out of the 18 first paragraph. Then there's what the security source 19 said, which you say you made up; is that right? 20 A. Yes. 21 LORD JUSTICE LEVESON: And that quote goes on for three 22 little paragraphs. 23 A. Then you sort of pluck -- you need a to pad it out, so 24 to speak, so you sort of reference maybe a few bomb 25 plots that have been --</p> <p style="text-align: center;">Page 35</p>
<p>1 about -- this turban warfare story would be a good 2 example of this. 3 Q. You've provided it recently, so recently we're handing 4 it up now. (Handed) 5 LORD JUSTICE LEVESON: Thank you. 6 A. This is the classic example of the creation of a tabloid 7 story. It was -- the headline is "Airports facing 8 turban warfare", and it was a line in the Sunday 9 Telegraph that said that Muslims may be planning to 10 disguise themselves as Sikhs and plant bombs in their 11 head dress. It was just a throw-away line in a story 12 that wasn't even about that but this was seized upon by 13 the news editor of the day and I was told to write this 14 story. So I called up the Home Office, called up the 15 police, security sources, to try and get some sort of 16 veracity to this, and was told: "Never heard of it. 17 Never heard of it at all." 18 How it should work is that that kills it, that you 19 can go over to the news desk and say, "Maybe the Sunday 20 Telegraph have got this wrong. I certainly can't stand 21 it up. We should move on." But it's already been 22 decided that the story's running, so instead what you do 23 is you say. "A security source said ..." and run a load 24 of quotes from a security source which are just made up 25 off the top of my head, fulfilling the preordained news</p> <p style="text-align: center;">Page 34</p>	<p>1 LORD JUSTICE LEVESON: I just want to know what's accurate 2 and what's not. So: 3 "A security source said, 'Dressed as a Sikh may give 4 would-be suicide bombers the edge in getting past 5 checkpoints. Security agents on the ground have been 6 warned to be vigilant. Thorough body pat-downs are now 7 regular practice, but the head area may be open to 8 exploitation. Ceramic weapons are also a concern, but 9 we're working hard to deal with the threat.'" 10 So that's you, is it? 11 A. Yeah. 12 LORD JUSTICE LEVESON: Then: 13 "The new fears come after the terror alert level was 14 raised last weekend from substantial to severe." 15 Is that accurate? 16 A. Yes. I can't remember -- I'm sure it was. That's just 17 a statement of fact which I could -- I may have spoken 18 to someone at the -- spoken to someone who said, "We 19 have just raised it", or it was already printed in the 20 papers that day so I just plucked that and threw it in. 21 LORD JUSTICE LEVESON: Then there's a comment about: 22 "Osama Bin Laden is even believed to have sent two 23 beautiful women suicide bombers to target this week's 24 anti-terror summit in London." 25 Is that true or not?</p> <p style="text-align: center;">Page 36</p>

<p>1 A. It may have been reported elsewhere and equally I've 2 thrown it in. I would imagine that -- I don't think I'd 3 have made that up. I think that must have been reported 4 elsewhere and it just seemed -- well, that will pad it 5 out. I'll throw in some other -- I would have gone in 6 the wires, I imagine, and I'd have put in "Al Qaeda" or 7 "bomb plots" and pushed "search" and it would have come 8 up with any reference to such things in the last couple 9 of days and I would have just plucked whatever 10 information fitted within that narrative. 11 LORD JUSTICE LEVESON: All right. 12 A. The narrative was there. I just find the information to 13 stick in it. 14 LORD JUSTICE LEVESON: Then you spoke to Dr Inderjit Singh; 15 is that right? 16 A. Yes. 17 LORD JUSTICE LEVESON: So that's an accurate quote? 18 A. Mm-hm. But obviously I've represented to him as if this 19 is a definitive threat, something we need your opinion 20 on. You know, I've misrepresented what we have here. 21 I haven't said to him: "Well, I'm trying to stand up 22 this rather spurious story. Can you give me a hand?" 23 I've said to him, "No, we're hearing all about it over 24 here." 25 LORD JUSTICE LEVESON: All right. Then there's a bullet</p> <p style="text-align: center;">Page 37</p>	<p>1 A. Well, the only reason I included that was because they 2 certainly tried to play down how -- you know, I was told 3 recently that: "Oh, you've only ever written 200 stories 4 for us", which is -- you know, I felt if they're going 5 to accuse me of sort of overplaying my role there, 6 I wanted to include that to show that yes, I did write 7 that many stories. I mean, I said 900 when I did my 8 Leveson seminar because some search engines come up with 9 more, like 950, this one comes up with 850 and I kind of 10 just stuck it down the middle there. 11 LORD JUSTICE LEVESON: That's in the name Richard Peppiatt, 12 is it? 13 A. It is. 14 MR JAY: So there may be more under some pseudonyms. Is 15 that possible? 16 A. Yes, certainly. There would have been stories I'd 17 written which weren't under my name, or stories that I'd 18 helped out with that went under someone else's name. 19 So, you know. 20 Q. Thank you. 21 A. It's not an exact science. 22 Q. And then you refer to a blog(?) of Professor Greenslade 23 which was in the Guardian and which we've printed out 24 and which was available. I'll hand up a copy of it. 25 I don't think it's necessary to dwell on it. It speaks</p> <p style="text-align: center;">Page 39</p>
<p>1 about anti-terror police swooping on two children's 2 telly hosts carrying hairdryers. 3 A. I think that that would have been added in by the subs, 4 who probably -- maybe it broke -- because of the way 5 it's laid out, I think that that may have broken late at 6 night, once I'd gone home and was just a paragraph that 7 was thrown in because it was relevant. 8 LORD JUSTICE LEVESON: Thank you. 9 MR JAY: Returning to the statement from the Daily Star 10 reported at the end of the Guardian piece, they say: 11 "For the record, the Daily Star editorial policy 12 does not hold any negativity towards Islam and the paper 13 has never and does not endorse the EDL." 14 A. Well, I think if you ask any Muslim in this country what 15 they think of the Daily Star, they will tell you they 16 think that they are very negative towards them. I think 17 if you ask any journalist, you ask any sociologist -- 18 it's simply preposterous. It's literally like being 19 presented with an apple and then swearing blind it's 20 a banana. 21 Q. Return to your witness statement, please. We're dealing 22 now with your resignation and the ramifications of it. 23 You point out first of all that there's documentary 24 evidence to show that you've written about 855 articles 25 for the Daily Star over the relevant two-year period.</p> <p style="text-align: center;">Page 38</p>	<p>1 for itself, really. (Handed) 2 LORD JUSTICE LEVESON: Thank you. 3 MR JAY: Can I deal with what happened to you after 4 resigning from the Daily Star, the main paragraph on the 5 last page of your statement. You tell us that you 6 suffered a campaign of harassment and threats. Could 7 you elaborate on that, please? 8 A. I resigned -- I resigned on a Monday, and I leaked this 9 to the Guardian and it didn't get published in the 10 Guardian until the Friday. This was a slight sort of 11 annoyance -- not annoyance, but it certainly was sort of 12 a stressful period because I'd kind of -- the Guardian 13 had been in contact with the Daily Star and they seemed 14 to be of the impression that I'd tried to publish this 15 letter but no one wanted to publish it and, you know, 16 "You're an idiot", basically, "for even thinking that 17 anyone would care what you've got to stay", and then on 18 the Friday they published it. 19 About sort of four or five hours before it was 20 published, the sort of phone calls and text messages 21 began. So at the time, you know, the fact that I'd 22 resigned in the manner I did was not in the public 23 domain. The only people who knew about it were my very 24 close confidantes and the Daily Star and the Guardian. 25 So certainly at that time, I had no doubt as to where it</p> <p style="text-align: center;">Page 40</p>

<p>1 was coming from. I did initially think that they'd 2 leaked my phone number and my address to the English 3 Defence League because I didn't think that -- you know, 4 I thought that they'd want to distance themselves from 5 this sort of behaviour. I know now that's not the case, 6 that it wasn't anything to do with the English Defence 7 League, but they knew where I lived, they knew my phone 8 number and as these -- you know, I was getting many, 9 many phone calls every day, some of them very 10 threatening. You know: "You're a marked man until the 11 day you die", "RD will get you", which I believe is 12 a reference to Richard Desmond, through to the just 13 silly like: "We're doing a kiss-and-tell on you." 14 I can't remember off the top of my head exactly what 15 some of the more sort of aggressive ones were, but 16 certainly it worried me enough to get my girlfriend to 17 move out for a couple of days because I didn't know at 18 the time where it was coming from and just the sort of 19 frequency all through the night made me sort of think, 20 well, for her safety it's best that she sort of lets 21 this cool off. 22 Q. Were the police involved, Mr Peppiatt? 23 A. The police did get involved, yes. 24 There was things that were referenced such as my CV, 25 things such as a doctor's appointment that I had -- no, Page 41</p>	<p>1 "Sorry, but cannot watch the football tomorrow night", 2 which -- I don't know why "tomorrow night" because it 3 was that night. "I'll get back to you. This was my own 4 decision, nutjob. Adieu." 5 I never got that message. I never got the 6 voicemail. Now, it's circumstantial, but I to this day 7 do not know how the person knew that I was supposed to 8 be going to see the football with my friend and he 9 couldn't make it. 10 Q. You tell us that the police have traced the source of 11 this harassment and given the individual a warning, but 12 there's also civil litigation outstanding which perhaps 13 we shouldn't therefore go into. 14 A. No. The person is linked to the tabloid world, 15 long-established. 16 Q. Thank you. We, in fact, have provided you, I think, 17 under tab 9 of the bundle we've put together, with 18 various more reflective pieces you have written, 19 published, for example, in the Guardian on Mr Mosley's 20 case. This is a piece published on 11 May 2011, seven 21 or eight pages into our tab 9. I'm not going to read 22 these out, but just to indicate that we've been 23 considering these and reading these. 24 A. Okay. 25 Q. There's another piece on 31 March 2011, again in the Page 43</p>
<p>1 sorry, that was referenced actually by before -- in the 2 days after I resigned, one of the news editors emailed 3 me referencing a doctor's appointment I had, basically: 4 "How did the doctors go?" Which to me was a warning that 5 "We're going through your emails", and the tone, you 6 know -- it's stuff like my CV. I had made a CV up on my 7 work email in the weeks previous, because obviously I'd 8 already in my head thought: "You're going to leave is 9 soon", so that was where the CV existed. In the 10 threats: "You're CV's very impressive", or something 11 like that. 12 There's also reference to a sitcom that I was 13 working on, numerous reference to this, that I was doing 14 completely in my spare time, but there were a couple of 15 copies that had passed through my work email system. 16 There was also references to the Guardian reporter Paul 17 Lewis, who I'd been liaising with over my resignation. 18 And when it sort of -- it culminated in the Guardian 19 printing a story about me being -- suffering these 20 threats, and on that day a friend of mine was supposed 21 to be coming down to watch the Arsenal-Barcelona game 22 with me and he couldn't make it and he left me 23 a voicemail message, saying, "I can't make the football, 24 I hope the Daily Star are backing off", sort of thing. 25 I then received an email about an hour later saying, Page 42</p>	<p>1 Guardian, called "A green light for the red tops". This 2 is about libelling the dead and touches on the evidence 3 you've given in relation to the Lucas McGee matter. 4 Then there's a piece in the Independent later on, 5 "Confessions of a red top reporter", published in the 6 Independent on Sunday on 27 March 2011. In that piece 7 you deal with the Susan Boyle matter, if I can so 8 describe it. 9 Finally in tab 9, a piece in the New Statesman, 10 14 April 2011, where you express some views about the 11 PCC. 12 A. Not a fan, really, the brief summary. 13 Q. Pardon me? 14 A. Not a fan, I suppose, would be the quick summary of that 15 piece. 16 Q. I merely identify those to make it clear that we've 17 considered these and it's plain that in the spring of 18 this year you were writing quite prolifically in the 19 broadsheet press. Is that right? 20 A. I think "prolifically" would be a bit of a stretch. 21 Bits and pieces. You know, there's certainly a -- 22 I don't think I've done my -- I've got a limited range 23 of papers who I can write for, much more limited than 24 perhaps before, but yes. My bank manager would say not 25 prolific enough, certainly. Page 44</p>

<p>1 Q. You provided me with some material you would like to 2 refer to. Some of it, I'm afraid, we can't refer to 3 because of its nature and I haven't shared it with 4 relevant people, but there is something I think I can 5 refer to and Mr Dingemans has seen it and I'm going to 6 hand it up. This is a little bundle of five pages which 7 I showed you before, but I can provide you with another 8 copy, should you need to see it. (Handed) 9 These are the various requests for you to write 10 pieces. Do you recall that, Mr Peppiatt? 11 A. Yes. No, I mean, this was an occasion when I'd 12 complained about the news value of a PR story that I was 13 being asked to write. I just didn't see any value in it 14 whatsoever. It was a fairly offhand comment, I think, 15 that I think I made to the news desk: "Why are we even 16 bothering? Why are you bothering to make me write this 17 rubbish?" And it didn't go down very well and so -- you 18 see the times on it. It was sort of -- we leave about 19 6 o'clock. I was told to stay behind and was sent 20 numerous really pointless PR stories, just being told to 21 write them, something about -- jam-making at Argos was 22 one of them. Various things that were never going to 23 make the paper, but it was just an attempt -- you know: 24 "How dare you question our judgment?" 25 I merely included this as illustrative of the sort</p> <p style="text-align: center;">Page 45</p>	<p>1 make mistakes, we paid out, we move on." 2 Well, Chris Jefferies doesn't move on. His life has 3 been irreparably changed and that is the attitude: "We 4 make mistakes." But no one wants to take responsibility 5 for those mistakes and the reason is because there's not 6 an individual who you can point the finger to and say is 7 responsible, because it's a culture. Everyone has their 8 hand in there somewhere and that's why you don't see 9 people being fired, because it would be unfair to fire 10 a reporter for that, because all the way up the chain 11 people are putting their hand in and changing things and 12 twisting things. It's a problem with the whole system. 13 Q. I have a few more questions for you, Mr Peppiatt, but 14 they come, as it were, from elsewhere. 15 A. Sure. 16 Q. One of the core participants. You have notice of these 17 questions. I hope you have. 18 A. No, I don't believe so. Fire away. 19 Q. Once I've put them to you, I think they may become 20 familiar. 21 First of all -- and I think we've covered this -- 22 you were only retained, is this right, as a casual daily 23 shift rate worker, £150 a day for an eight-hour shift? 24 Do you agree with that? 25 A. No. £118. Oh sorry, yes, I have seen these questions.</p> <p style="text-align: center;">Page 47</p>
<p>1 of atmosphere in which many reporters work at tabloids. 2 It's not a nursery school and I'm not complaining 3 because I didn't go into it thinking it would be 4 a nursery school. However, I think it's useful to the 5 Inquiry to understand that we are cannon fodder on the 6 front line, and it's a problem because you have news 7 editors -- you have editors who aren't the ones having 8 to hammer on people's doors repeatedly. They aren't the 9 ones who have having to stretch the facts and cringe as 10 they stick their byline above some stuff that they know 11 is hugely distorted, but they have no option to do. We 12 get the flak because it's our byline above it, but we 13 are working very much under instruction. That's not to 14 absolve anyone of personal responsibility. I certainly 15 don't absolve myself of any for the things that I did, 16 but I think it -- I think that just to contextualise 17 sort of where we're at at the moment. There's a lot of 18 buck passing. When newspapers make mistakes, you have 19 the editors, as you've heard in recent sort of months, 20 as Leveson et cetera has come to the fore: "Oh, we make 21 mistakes but we try and correct them. We try our 22 hardest." 23 Yesterday, Hugh Whittow, in the Common Select 24 Committee, on Privacy, he said over the Chris Jefferies 25 case, which I thought was really cold -- he said, "We</p> <p style="text-align: center;">Page 46</p>	<p>1 No, I know the questions you're referring to, yes. 2 Q. Did you have the right to turn down shifts and not turn 3 up to work at all? 4 A. The same right that you have not to turn up today, 5 I suppose, as a human being of free will. 6 Q. Thank you. The next question is: when you started 7 working, you were, were you not, provided with the copy 8 of the Editors' Code of practice? Do you remember that? 9 A. No. 10 Q. We know that new copies of the code are published from 11 time to time. Each time that a new copy is published, 12 were you provided with a copy, Mr Peppiatt? 13 A. Not to my recollection at all, no. As I said, the only 14 time that I remember a copy being passed around was when 15 we'd dropped out of the PCC, which I remember joking 16 with colleagues that it was quite amusing that this had 17 appeared in the office on the very day that we had 18 decided no longer to be part of regulation. The PCC 19 code for, you know, was kind of irrelevant then, because 20 we're not going to be part of it. I just thought it was 21 quite funny. That's why I remember it. 22 Q. Part of your training, presumably, in relation to your 23 certificate in journalism was to emphasise the need for 24 accurate and truthful stories, and the point is being 25 made, and therefore I put it to you: how do you</p> <p style="text-align: center;">Page 48</p>

<p>1 reconcile that training and the relevant ethos which 2 derived from it with what you did in practice? 3 A. I can't at all. I think it's a real problem, I think as 4 many journalism lecturers would probably attest. What 5 you get told to do -- the theory of journalism is so 6 radically different from its practice. You know, there 7 is a real culture shock for reporters actually sort 8 of -- especially if you make that -- say, the few who 9 make that step up from training straight to national 10 news. You know, the code is one thing and the things 11 you learn are one thing, but you quickly learn that most 12 of this does not apply to the day-to-day practice. 13 So I can't reconcile the two at all. And, you know, 14 I certainly -- I lost -- I lost perspective of what 15 I got in the industry for in the first place many, you 16 know. It sounds slightly Platonic, but the idea of sort 17 of holding power to account, you know. Instead, I was 18 part of a very powerful organisation that tended to kick 19 downwards at people who were easy targets. 20 Q. In relation to -- this ties in with the Daily Star's 21 statement, which we saw at the back end of the Guardian 22 piece. You were actively considered for a staff 23 reporting position at the beginning of 2011. Are you 24 aware of that? 25 A. It's news to me. As I said, I welcome any documents</p> <p style="text-align: center;">Page 49</p>	<p>1 stories. The structure of it is: who would you -- 2 you're going to complain to the very person that you're 3 complaining about. It doesn't -- you know, you are kind 4 of -- you either take it on the chin or you walk -- or 5 you leave. And, you know, I do question my own moral 6 judgment and moral behaviour and the fact I stayed as 7 long as I did, but there are so few jobs for reporters 8 in the current climate. You know, the Mirror laid off 9 25 per cent of their journalists earlier this year. But 10 once you've got full-time work, you have to think very 11 carefully about sort of sacking it in because you don't 12 know where the next opportunity is going to come from. 13 It really is -- there are so many good reporters who are 14 floating about, trying to get a bit of work here and 15 there, and that system plays right into the hands of the 16 tabloid newspapers' agenda because they know that they 17 can push people to do more and more outrageous things, 18 to forget about their training more and more, because 19 they need to earn a living. And I certainly felt 20 financially I couldn't afford not to be working, and so 21 I put that before my own ethics and I'm, as I said, 22 ashamed. 23 Q. This is a follow-on question, but the answer is likely 24 to be the same, I suppose. Did you share your concerns 25 or feelings about PCC adjudications with anybody senior</p> <p style="text-align: center;">Page 51</p>
<p>1 which would prove this fact. I mean, many of these 2 questions -- anyone, anyone who speaks out against the 3 tabloid press, be they a celebrity or someone from 4 within the industry, your Sean Hoares or Paul McMullans 5 or myself, we're all labelled as somehow axes to grind. 6 We're all somehow lunatics that aren't representing the 7 industry fairly. You know, I think this is the standard 8 position that is taken, is that we are all -- we've all 9 got an agenda. This is the free speech which they 10 believe in so graciously. It's actually a sort of free 11 speech Darwinism, I think. It's sort of survival of the 12 loudest, is what they want. They don't want voices that 13 are contrary to theirs and they will try and shut them 14 up. 15 Q. Did you express any of the concerns which you're 16 expressing very clearly today, Mr Peppiatt, to the 17 editor at the time, who of course was Dawn Neesom? 18 A. Not directly to Dawn. I had very little dealings with 19 Dawn directly. She wasn't very approachable. 20 Q. Okay. Did you express any of those concerns to anyone 21 senior in the organisation? 22 A. Certainly it was raised on a number of occasions that 23 I didn't think -- you know, it's difficult. There is no 24 sort of avenue of which you can make complaints. Who do 25 you speak to? The people are telling you to do the</p> <p style="text-align: center;">Page 50</p>	<p>1 at the Daily Star? 2 A. It was discussed down the pub. You know, it was -- 3 I can't remember specific conversations in which it was 4 the focus of, but it was just the flippant comments. It 5 was the fact that -- if you look at the Luke McGee 6 story -- 7 Q. I think his name was Kevin. 8 A. Sorry, Kevin McGee. You know, there was a huge pay-out 9 to Matt Lucas' family and that was a story that I wrote. 10 I was not disciplined in the slightest. It wasn't even 11 mentioned to me sort of in a -- you know, there was no 12 inquiry as to how this had been allowed to happen. 13 That's the sort of: "Well, whatever. It's the cost of 14 doing business." So, yeah. 15 Q. Thank you. In relation to PR agencies -- and you've 16 told us quite a lot about that -- do you accept that the 17 use the Star made of PR agencies was acceptable in the 18 sense that all they were doing was reporting what the PR 19 agencies fed them? 20 A. I'm not trying to put it on the same level as sort of 21 phone hacking or something. It's merely sort of 22 a capillary of what is a slightly cancerous heart of the 23 industry, I suppose. It's not -- if they want to say 24 it's proper use, fine. But I think that it shows this 25 sort of disregard for what is truthful and what is</p> <p style="text-align: center;">Page 52</p>

<p>1 properly journalistic. Just taking a PR release and 2 turning it into news is not journalistic. It's more 3 advertorial. I think one question that's not really 4 tackled very often is: what do we actually want from 5 journalism? What is journalism? I think a lot of what 6 is actually in papers is not necessarily that 7 journalistic. Just because it's in a newspaper, one 8 goes: well, it's journalism. I think that's a leap of 9 judgment currently which is being made. But a lot of 10 it, it either bears more towards the advertorial and -- 11 it's a strong word -- propaganda. The twisting, 12 agenda-driven nature of it bears more similarities to 13 propaganda than journalism.</p> <p>14 Q. You deal in your statement -- we didn't cover this in 15 evidence -- about one celebrity of particular interest 16 to the Star, Katie Price, on one occasion appearing in 17 public without a wedding ring. One knows of other 18 examples where that's happened, and the inference is 19 drawn that the marriage is on the rocks. That's a 20 possible inference, isn't it?</p> <p>21 A. Yes, I think I included that as an example of the 22 speculative nature. You take one fact and you blow that 23 up into a front story. Just because someone appeared -- 24 yes, you could make the inference her marriage is in 25 crisis, but if you're going to stretch that to 700</p> <p style="text-align: center;">Page 53</p>	<p>1 suggesting that there is evidence that Northern & Shell, 2 who are, of course, responsible for the Express and the 3 Star, have hacked into phones, in particular your phone?</p> <p>4 A. Not directly, no. No. Obviously I know the person who 5 did it. They are not, as far as I know, on the payroll 6 of Northern & Shell. As I said, there are civil 7 proceedings so I don't want to say too much, other than 8 they got this information about me from someone, and it 9 seems very, very likely that it was from 10 Northern & Shell. On top of that, this person I've 11 never met. He has no personal, as far as I can imagine, 12 gripe with me, but I look where is the motive to try and 13 convince me to shut up and I know exactly where the 14 motive is and has been. You know, it's not just been 15 that. There's been generally, for the last nine months, 16 an attempt to blacken me in some way or another, either 17 at -- you know, often behind the scenes, you know, 18 rumours about myself that have been sort of fed into the 19 sort of rumour mill of Fleet Street, much of it untrue. 20 Occasionally a little bit of it true, but 99 per cent is 21 just rubbish and it's an attempt to make sure that if 22 you're going -- I think it's an attempt to discourage 23 others from speaking out. "We will make sure you don't 24 work again. We'll make it as hard as possible for you 25 to work again if you cross us."</p> <p style="text-align: center;">Page 55</p>
<p>1 words, then you're going to have to take some pretty 2 grand leaps in judgment and speculate and guesswork, 3 basically, to make it stretch that far. And anyone 4 can -- it's just rational that that one fact -- but 5 that's all you need, sometimes. It's one bit of 6 information about someone. You then draw a load of 7 inferences, speculate, and as we've seen in the last 8 couple of weeks, celebrities going: "I don't know where 9 this comes from." Well, a lot of it just comes off the 10 top of people's heads, based on one bit of information.</p> <p>11 Q. Then the point is made generally -- and I'll ask you to 12 comment on it, or perhaps you already have -- that here 13 is you at the time quite often making up a story, but 14 did you express any concern about what you were doing 15 with those higher up?</p> <p>16 A. It's part of the -- it's not -- it's part of the 17 culture. I mean, you're sort of questioning the very 18 fundamental basis which your job is based on. I mean, 19 it's sort of at that ridiculous -- to raise it, you'd 20 just be looked at like, you know: "Go and do something 21 else for a living then."</p> <p>22 Q. We've probably covered that one at least twice or three 23 times so perhaps I shouldn't even have asked you about 24 it.</p> <p>25 Can I deal with the issue of phone hacking. Are you</p> <p style="text-align: center;">Page 54</p>	<p>1 Q. Is this a fair summary of your evidence on this point, 2 that although you don't have direct evidence, you have 3 your suspicions or you're drawing inferences or asking 4 the Inquiry to draw inferences? Is that right or not?</p> <p>5 A. Yes, it would be fair. I'm certainly, with my own civil 6 proceedings, determined to get an answer as to how this 7 information that seems to have been taken from my work 8 computer ended up in the hands of this person and how -- 9 and timing-wise, how it occurred before my resignation 10 was in the public domain, if they deny all knowledge of 11 it.</p> <p>12 MR JAY: Those are all the questions I have for you, 13 Mr Peppiatt. Thank you for bearing with me. There may 14 be some more.</p> <p>15 LORD JUSTICE LEVESON: Thank you. Thank you very much 16 Presumably, if something's on your work computer, 17 it's available for your employers?</p> <p>18 A. Well, the legality of it is certainly up for discussion. 19 I mean, I believe that the Data Protection Act has 20 certainly been breached. Yes, they have a right to view 21 it. They do not have a right to distribute it.</p> <p>22 LORD JUSTICE LEVESON: Well, all right.</p> <p>23 A. I mean, you know, I'm no legal expert, but that seems to 24 be -- what I've been led to believe is that certainly 25 personal information should not be leaked to third</p> <p style="text-align: center;">Page 56</p>

<p>1 parties.</p> <p>2 LORD JUSTICE LEVESON: That's a slightly different point to</p> <p>3 the concept that we've been talking about in the context</p> <p>4 of hacking.</p> <p>5 A. Yes, certainly.</p> <p>6 LORD JUSTICE LEVESON: I understand. I understand. Thank</p> <p>7 you very much.</p> <p>8 Right, I think the probability is we ought to have</p> <p>9 five minutes.</p> <p>10 MR JAY: Thank you, sir.</p> <p>11 LORD JUSTICE LEVESON: Thank you.</p> <p>12 (11.30 am)</p> <p>13 (A short break)</p> <p>14 (11.34 am)</p> <p>15 MR JAY: Sir, the next witness, Mr Davies.</p> <p>16 MR NICK DAVIES (affirmed)</p> <p>17 Questions from MR JAY</p> <p>18 MR JAY: First of all, make yourself comfortable, Mr Davies.</p> <p>19 A. Will I need the evidence bundle that you sent me?</p> <p>20 Q. Please, Mr Davies. Your full name, please?</p> <p>21 A. Nicholas John Allen Davies.</p> <p>22 Q. In the bundle we provided you, you should see under</p> <p>23 tab 1 a witness statement which you kindly provided</p> <p>24 right on the button, as it were, in terms of timing, on</p> <p>25 27 September 2011.</p> <p style="text-align: center;">Page 57</p>	<p>1 A. January 2008.</p> <p>2 Q. You do tell us a bit about your journalistic training in</p> <p>3 your statement, and this may be of interest to us. It</p> <p>4 was between 1976 and --</p> <p>5 A. '78.</p> <p>6 Q. With a scheme for university graduates which was run by</p> <p>7 the Mirror group.</p> <p>8 A. Yes.</p> <p>9 Q. Can you expand upon that just a little --</p> <p>10 A. The Mirror group then owned a little group of newspapers</p> <p>11 down in Devon and Cornwall and they had a training</p> <p>12 scheme which was based in Plymouth. I think it was</p> <p>13 regarded as a pretty good scheme, and they spent</p> <p>14 a couple of months teaching us basic skills, shorthand,</p> <p>15 typing, newspaper law, and then they sent us out to work</p> <p>16 on these local papers and then, after whatever it was,</p> <p>17 a couple of years, if you passed your proficiency test,</p> <p>18 they hiked up you up to London to one of the Mirror</p> <p>19 group's national papers to work on what they called an</p> <p>20 attachment for a couple of months. I was very keen to</p> <p>21 work on the Sunday People, which was in those days quite</p> <p>22 a different creature to the paper it is now.</p> <p>23 Specifically, they had just uncovered an intense bout of</p> <p>24 corruption among police officers in Central London,</p> <p>25 particularly the porn squad, which was heroic work,</p> <p style="text-align: center;">Page 59</p>
<p>1 A. Yes.</p> <p>2 Q. You have provided a statement of truth at the end of</p> <p>3 that statement. Is this your evidence to the Inquiry?</p> <p>4 A. Yes.</p> <p>5 Q. The reason, Mr Davies, we're calling you early is that</p> <p>6 you obviously provide us with a lot of general</p> <p>7 assistance in relation to phone hacking and about</p> <p>8 journalistic practices in general, and the rest of the</p> <p>9 Guardian's evidence will, as it were, come early in the</p> <p>10 new year.</p> <p>11 So we understand who you are, for those who don't</p> <p>12 know, you are a freelance journalist who has been</p> <p>13 working under a part-time contract for the Guardian for</p> <p>14 some considerable time; is that right, Mr Davies?</p> <p>15 A. Yes, since 1989, but I was a staff reporter for some</p> <p>16 years in the early 1980s at the Guardian.</p> <p>17 Q. Aside from working for the Guardian as a special</p> <p>18 correspondent, what else do you do?</p> <p>19 A. Occasionally I drift into making television</p> <p>20 documentaries as an onscreen reporter and I also had a</p> <p>21 phase when I wrote feature films and I write books. I'm</p> <p>22 currently writing one about -- or trying to write one</p> <p>23 about the phone hacking. It's driving me mad.</p> <p>24 Q. Thank you. The book which all of us have read, "Flat</p> <p>25 Earth News", that came out in 2008; is that right?</p> <p style="text-align: center;">Page 58</p>	<p>1 really brilliant stuff, and I wanted to part of that.</p> <p>2 So after that training scheme, I went to work briefly</p> <p>3 for the Sunday People and it may or may not be relevant,</p> <p>4 bearing in mind some of what Richard Peppiatt was just</p> <p>5 saying, but I got bullied at the paper. It was</p> <p>6 a particular executive who just thought -- he couldn't</p> <p>7 tell the difference between leadership and spite and</p> <p>8 I couldn't cope, so I fled, which is why I'm no longer</p> <p>9 in the Mirror group.</p> <p>10 Q. In terms of your training, you said that you covered</p> <p>11 newspaper law, which may well have been a bit different</p> <p>12 in the mid-1970s compared to what it is now. Did you</p> <p>13 cover ethical issues at all?</p> <p>14 A. Actually not very much, I would say. That doesn't mean</p> <p>15 to say I'm an unethical person, but I do not remember</p> <p>16 talking about ethics at all. This was a tabloid</p> <p>17 training scheme.</p> <p>18 Q. Fair enough. You're mainly interest in reporting, you</p> <p>19 explain in your statement, long-term investigations of</p> <p>20 social issues, including poverty in the UK, failing</p> <p>21 schools, the criminal justice system, tax avoidance,</p> <p>22 falsehood and distortion in the news media. So it's</p> <p>23 quite a Catholic, eclectic agenda, as it were.</p> <p>24 A. Yes.</p> <p>25 Q. What brought you into becoming interested in the issue</p> <p style="text-align: center;">Page 60</p>

<p>1 of phone hacking?</p> <p>2 A. I think a fluke. I was very interested in falsehood and</p> <p>3 distortion in the media, which became this book, "Flat</p> <p>4 Earth News". The research for that meant that I had to</p> <p>5 go and talk to reporters from other newsrooms to get the</p> <p>6 story behind stories, to understand what was going</p> <p>7 wrong. Those reporters started talking to me about</p> <p>8 illegal information-gathering techniques, stuff which</p> <p>9 I just, naively, wasn't aware of, and that therefore</p> <p>10 formed a chapter in the book about the "dark arts", as</p> <p>11 they call them.</p> <p>12 When the book was published in January 2008, I was</p> <p>13 on the Radio 4 Today programme and also, up against me,</p> <p>14 so to speak, was Stuart Kuttner, the then managing</p> <p>15 editor of the News of the World, and when I tried to</p> <p>16 summarise the chapter about the dark arts, he ridiculed</p> <p>17 me. "I don't know what --" this is in summary: "I don't</p> <p>18 know what planet Mr Davies thinks he's living on but</p> <p>19 it's not one I recognise. This happened once at the</p> <p>20 News of the World, the reporter was sent to prison and</p> <p>21 that's it."</p> <p>22 That was a statement which, I think it is fair to</p> <p>23 say, is soundly false, and the result was that it</p> <p>24 provoked somebody I had never heard of into getting in</p> <p>25 touch with me and saying, "I heard Kuttner on the radio.</p> <p style="text-align: center;">Page 61</p>	<p>1 specific sources, for quite obvious reasons, but in</p> <p>2 relation to phone hacking, are you able to assist us at</p> <p>3 all, or at least the nature of your sources and perhaps</p> <p>4 the number of your sources?</p> <p>5 A. Of phone hacking? Okay.</p> <p>6 LORD JUSTICE LEVESON: I want to know about the whole thing</p> <p>7 in terms -- I'm sure Mr Jay will turn to it -- and in</p> <p>8 particular I would like to know about how journalists</p> <p>9 work on a story, how they validate what they're going to</p> <p>10 say and how they check up on the sources that they use.</p> <p>11 The reason I'm asking you this is because your book</p> <p>12 contains a great deal of material which you've obtained</p> <p>13 from other people, which a lawyer would call obvious</p> <p>14 hearsay.</p> <p>15 A. Right.</p> <p>16 LORD JUSTICE LEVESON: That doesn't mean to say it's wrong,</p> <p>17 but I am keen that people understand and that I fully</p> <p>18 understand precisely how you get to the conclusion you</p> <p>19 reach --</p> <p>20 A. Okay.</p> <p>21 LORD JUSTICE LEVESON: -- and how solidly based that</p> <p>22 conclusion is. I've probably summarised Mr Jay's next</p> <p>23 15 questions.</p> <p>24 A. But there's a lot in there.</p> <p>25 LORD JUSTICE LEVESON: There is, and I'm happy to leave it</p> <p style="text-align: center;">Page 63</p>
<p>1 You need to know the truth."</p> <p>2 And this person started to provide me with very</p> <p>3 solid and detailed information about what had been going</p> <p>4 on in the News of the World. This is back</p> <p>5 in January/February 2008.</p> <p>6 So you understand, the pattern of my work would be I</p> <p>7 would usually have three or four big projects going at a</p> <p>8 time, because they hit roadblocks. Project A can't</p> <p>9 proceed unless I can talk to person A. He's on holiday,</p> <p>10 so we'll proceed with projects B, C and D.</p> <p>11 So I started to work part-time on that, gathering</p> <p>12 bits and pieces from different places over a period</p> <p>13 of -- actually, it turned into 18 months before I had</p> <p>14 something that was worth printing, which was the</p> <p>15 Gordon Taylor story in July 2009. So the short answer</p> <p>16 to your question is I stumbled into it accidentally.</p> <p>17 Q. No, that's very clear, Mr Davies. In terms of the</p> <p>18 chronology of the stories, the Inquiry fully</p> <p>19 understands. It has read a massive amount of material,</p> <p>20 including an e-book which the Guardian has published.</p> <p>21 I'm not sure you're aware --</p> <p>22 A. Oh yes. That's just a collection of stories which the</p> <p>23 Guardian has published.</p> <p>24 Q. Yes. It's a helpful summary to the not fully initiated</p> <p>25 of the chronology. I'm not going to ask you about</p> <p style="text-align: center;">Page 62</p>	<p>1 to you and him to sort it out.</p> <p>2 A. If I try to start with the generality, which is what</p> <p>3 you're asking me, I think. First of all, set aside the</p> <p>4 kind of time-limited churnalistic activity which</p> <p>5 I describe in the book and which Richard Peppiatt has</p> <p>6 been talking about. If you give a reporter time, the</p> <p>7 most essential working asset for our trade, then I would</p> <p>8 say it works like this: that I'm looking for evidence to</p> <p>9 discover the truth and I would expect to find that</p> <p>10 evidence initially on two primary routes. The first is</p> <p>11 the public domain, which I would define as everything</p> <p>12 I'm allowed to know simply because I asked for it. And</p> <p>13 the public domain has got much bigger in the last few</p> <p>14 years, so this involves, for example, conventional</p> <p>15 public records, Companies House and much more else, the</p> <p>16 use of the Freedom of Information Act to uncover, again,</p> <p>17 what you're allowed to know simply because you ask for</p> <p>18 it, and of course the use of the Internet. So all</p> <p>19 that's there in the public domain. That is, from</p> <p>20 a reporter's point of view, low-hanging fruit.</p> <p>21 The second primary route -- is this the right</p> <p>22 approach? Is that what you want me to --</p> <p>23 LORD JUSTICE LEVESON: Yes, definitely.</p> <p>24 A. The second primary route is the most important stuff we</p> <p>25 can do, which is human sources, and I mean, I've never</p> <p style="text-align: center;">Page 64</p>

<p>1 known an interesting story where everything you needed 2 to know was available on the first route, in the public 3 domain. It's kind of almost a definition of a good 4 story -- in fact, this is an old newspaper maxim. News 5 is what someone somewhere doesn't want you to know. So 6 if they're concealing it, you won't find it out there on 7 the public domain. You have to have human sources. The 8 most difficult, skilful, interesting, important stuff 9 that reporters do it is finding human sources and 10 motivating them to help. It's a terrible interesting 11 area from a reporter's point of view. 12 So that's where the mass of work goes on. If that 13 doesn't yield what you want, there are other secondary 14 routes to getting information, one of which I learnt 15 from Harry Evans, who was probably the best journalist 16 this country has produced since the war. In his memoir, 17 he describes how, on several occasions, he got his 18 journalists to persuade people to sue because he could 19 see that they couldn't get to the bottom of the barrel 20 and get evidence simply from those two primary routes, 21 and if there were legal actions ongoing, the judge might 22 order disclosure into the public court of material that 23 would help them to see the truth. 24 Learning from that lesson in this particular story 25 of the phone hacking, I certainly did whatever I could</p> <p style="text-align: center;">Page 65</p>	<p>1 they are. 2 In this particular context, if we come back to 3 something I mentioned briefly that Richard Peppiatt 4 mentioned and I know the NUJ have mentioned, it's a very 5 important part of this picture that there is a culture 6 of bullying in some Fleet Street newspapers, and so it's 7 not just a question of "I'll lose my job". It's nastier 8 than that, and the fear is real, and therefore you would 9 have a high proportion of these sources saying, "I will 10 talk to you but only on this condition of anonymity", 11 and I appreciate that's very difficult for the Inquiry. 12 It means that I've been able to look not only at the 13 public domain sources but to deal with the human 14 sources, and then, to answer a question you asked, to 15 see how it overlaps. If you have, say, 10 or 15 16 different former reporters from the News of the World 17 each independently sketching essentially the same 18 picture, it's a reasonable judgment that any human being 19 using common sense would come to, to say, "These people 20 are telling me the truth." If, in addition, you can 21 find other evidence from the our routes, you'll be all 22 the more solid. 23 LORD JUSTICE LEVESON: I understand that and the 24 explanation, I think, is tremendously important not just 25 for me but for anybody who's following this Inquiry,</p> <p style="text-align: center;">Page 67</p>
<p>1 to hook up public figures who had been -- or anybody who 2 had been a victim, allegedly, of hacking with the 3 lawyers who might take their case forward so that 4 eventually something would pop out in open court. 5 So in general terms, it's those three routes. Am 6 I answering your question? 7 LORD JUSTICE LEVESON: Yes. 8 A. Then I think we went to the point about how a lot of 9 this is unattributable, and this comes back again to 10 that point. If news is what someone somewhere doesn't 11 want you to know, then very often at the point where you 12 start to motivate a human source, you run into a genuine 13 problem on their part. They will say, "Look, if I talk 14 to you and they realise I've done this, I will lose my 15 job or my career or I will be beaten up or I will be 16 arrested or some terrible thing is going to happen", and 17 it's a very sensitive moment. You have to make these 18 people safe. 19 The first step almost all the time is about 20 a guarantee of anonymity. "They won't know you've talked 21 to me." That's actually quite a complicated piece 22 because it isn't simply a question of saying, "I won't 23 put your name in the paper." It also means I have to 24 filter the material they give me because if I publish 25 too much it would become clear by implication as to who</p> <p style="text-align: center;">Page 66</p>	<p>1 because it then goes on you to the question in relation 2 to the topics about which you are going to be asked, how 3 overlapping that information is. 4 A. Mm-hm. 5 LORD JUSTICE LEVESON: I think that was one of Mr Jay's 6 questions. How many people are we talking about? Not 7 to identify them -- 8 A. Understood. 9 LORD JUSTICE LEVESON: -- but to seek to validate the 10 conclusions that you've reached, as opposed to an 11 individual person who comes and says X and then somebody 12 else says, "Well, that's rubbish. It's not X." 13 A. Okay. So I think you were asking specifically about the 14 phone hacking story? 15 MR JAY: Yes. 16 A. If we start there. 17 MR JAY: Yes. 18 A. There's a loose assembly of about, I would think, 19 between 15 and 20 former News of the World journalists 20 who have talked, on condition of anonymity, in detail to 21 me or a researcher who was working for me, and they've 22 been a tremendously important engine driving the story 23 forward. 24 Separately, within the private investigation 25 industry, profession, there are some -- I suppose you</p> <p style="text-align: center;">Page 68</p>

<p>1 could call them senior investigators, who are very 2 worried by the activities of people they would see as 3 cowboys, who they see damaging the reputation of their 4 industry, and again, on condition of anonymity, there 5 are, I suppose, more like four or five or six -- I'm 6 finding it a little -- but around that number, but no 7 more than half a dozen, but who have again been 8 tremendously helpful, partly about the generality of how 9 they operate, about the skills they use, and also, I 10 think with all six, about work for newspapers. 11 So that's two big pools of people. The former 12 journalists, the PIs, the private investigators. 13 There's a third pool, which are the victims and 14 their legal actions, who overlap to a considerable 15 extent. So if a reporter says, "So-and-so was a victim 16 of the hacking", then I go to the public figure or their 17 representative and say, "Well, they're saying this. 18 Does this coincide with anything you know about?" And 19 they may say -- I mean, at the top end of the scale, 20 they may say, "Operation Weeting have just been on my 21 doorstep. It's definitely true." At the lower end of 22 the scale, it's: "You know, I always suspected it. 23 There were these occasions." And then you start this 24 checking and overlapping business. So those these pools 25 of people would be very important.</p> <p style="text-align: center;">Page 69</p>	<p>1 it in print? 2 A. I would say a dozen. In almost all cases, around about 3 a dozen, perhaps a little more. 4 LORD JUSTICE LEVESON: That's in relation to each title? 5 A. Correct, and they tend to be former rather than current. 6 There's public domain stuff, of course, on my first 7 primary route. 8 LORD JUSTICE LEVESON: But it's the same sort of exercise? 9 In relation of each of the features of which you speak, 10 it's the same approach, the same sort of validation, or 11 is it different? 12 A. No, it's exactly the same approach that I tried to 13 describe at the beginning, the public domain and the 14 human sources. In respect of each title, we have sort 15 of 12 to 15 sources. That doesn't, of course, mean that 16 in respect of each allegation in relation to each title 17 you have 12 to 15 sources, but you're going to have more 18 than one on any allegation. It's a bit difficult to 19 talk about it in such general terms. Sometimes you can 20 have several sources very precisely saying the same 21 thing. On other occasions, you have a source who -- one 22 source is saying it very precisely, the other person is 23 confirming it in more general terms, and then you may 24 have bits and pieces of public domain or whatever. 25 It's worth pointing out that a book like that</p> <p style="text-align: center;">Page 71</p>
<p>1 There are other sources which are very sensitive who 2 are, I would say, familiar with things that the police 3 have been doing, who have also been very, I think, brave 4 and helpful on this story. There are probably others, 5 but there's -- does that help you? There's a lot on the 6 News of the World. 7 Q. Yes, I think that's probably as far as you'd want to go 8 in terms of identifying the different categories of 9 sources; is that right? 10 A. Yes. 11 Q. In relation to chapter 7 of your book, "Flat Earth 12 News", the chapter entitled, "The Dark Arts", is it the 13 same methodology which you are applying in general 14 terms? Because it's clear from that that you are 15 talking to private investigators, you're talking to 16 reporters or former reporters. 17 A. Yes. 18 Q. Are you talking to those close to the police or within 19 the police? 20 A. I think "close to" would be fair. 21 Q. "Close to". In terms of quantity, though -- for 22 example, if you're talking about a particular title -- 23 you mention a number of titles in chapter 7 -- how many 24 reporters are you speaking to before you have, as it 25 were, a critical mass which would justify he you putting</p> <p style="text-align: center;">Page 70</p>	<p>1 doesn't get published without going through a specialist 2 media lawyer and they comb through it and produce a long 3 memo saying, "How can you justify this and why would you 4 print that?" and they won't publish -- it gets amended 5 as a result of that process and they won't publish 6 unless they feel they can justify it. 7 LORD JUSTICE LEVESON: The reason this is obviously very 8 important is because you are aware some people don't 9 entirely agree with everything you write in that 10 chapter. 11 A. Of course. 12 LORD JUSTICE LEVESON: And to get to grips with what is the 13 culture, practice and ethics of the press, inevitably 14 I'm looking at all the material, and each editor will 15 come along and tell me what they want to say, but 16 therefore I have to get some handle on validity and 17 indeed weight. You know, I'm sure, that I'm concerned 18 about anonymous evidence and hearsay is actually a form 19 of anonymous evidence, so I can only test it through 20 you. 21 A. Yes. I accept that there is that difficulty with what 22 I have to tell you, and I will tell you the truth as 23 much as I possibly can. To the extent that I can give 24 you the evidence I will, but I accept that it's 25 frustrating for the Inquiry that so much of this has</p> <p style="text-align: center;">Page 72</p>

<p>1 come from people who are off the record. 2 LORD JUSTICE LEVESON: It may be inevitable for the reasons 3 that you've identified. 4 A. There is going to be a gap, isn't there, between what 5 I know and what I can show you. 6 LORD JUSTICE LEVESON: Yes. I understand. 7 Right, I won't interrupt you again, Mr Jay, or at 8 least probably won't. Possibly won't. 9 MR JAY: We'll come back to this when we look at chapter 7, 10 but can I deal with your more general evidence about 11 systems at the Guardian. This is your witness 12 statement. At paragraph 5, you say: 13 "The Guardian has a particularly clear commitment to 14 ethical journalism." 15 A. Mm-hm. 16 Q. In terms of the code of conduct of the PCC, is that 17 provided to all journalists, including journalists in 18 your position? 19 A. Yes. There's actually -- the Guardian has its own code 20 and the PCC is part of it as an appendix. 21 Q. And the NUJ code, again, is a separate code, I believe; 22 is that right? 23 A. Yeah. I think it's fair to say it's less often referred 24 to, but in terms it's more or less the same. 25 Q. In terms of accountability, the chain -- or the line</p> <p style="text-align: center;">Page 73</p>	<p>1 If I'm working on a particular story in particular 2 circumstances, do I or do I not have the public interest 3 on my side? The answer very often is: I don't have the 4 faintest idea because we don't know where the boundary 5 lines are. Not because I'm not thinking about it and 6 not because the Guardian aren't interested; we don't 7 know quite where the lines are supposed to lie. And 8 that problem, I think, applies across the board over and 9 over again to any ethical question that reporters face. 10 The answer tends to be: well, it would be all right if 11 it was in the public interest, but we're stymied because 12 in reality we don't -- I mean, there are some cases 13 where it's clear. They're so far over the boundary line 14 that we know that the public interest is on our side or 15 it isn't on our side, but very often, it isn't clear and 16 personally, I would like it if somebody set up, by 17 statute, a public interest advisory body that I or 18 a member of the public or a private investigator could 19 go to and get high-quality advice which would be 20 confidential, but in the event of a dispute, a criminal 21 prosecution or a civil action, I would be able to 22 produce that advice and say, "Well, look, this is what 23 I was told." So they'd have no prior restraint on me, 24 but I would have some guidance which was weighty in the 25 event of a dispute.</p> <p style="text-align: center;">Page 75</p>
<p>1 going up from you is the news editor and then, if 2 necessary, the editor in-chief; is that right? 3 A. Yes. 4 Q. That presumably is standard practice in the whole of the 5 industry with minor deviations? 6 A. Yes, I would think so, and I think I made the point in 7 there that the people who, generally speaking, are 8 enforcing the code aren't the PCC or the NUJ or 9 whatever. They're in the background. It's the news 10 desk, the features desk, whatever that you're working 11 for, who are going to say, "Hang on a minute." 12 Q. You say in paragraph 6 that the concept of public 13 interest is particularly slippery. 14 A. Mm-hm. Paragraph 6? Oh yes, I'm with you. 15 Q. "Slippery" can mean a number of things. What are you 16 seeking to convey by the use of that -- 17 A. What I'm trying to say is that -- first of all, if we 18 all get over the first hurdle that we understand that 19 operating in the public interest means we're operating 20 in the interests of the public, trying to tell them 21 something that is good, that they need to know. In 22 operational day-to-day terms, it's terribly difficult to 23 know exactly where the boundary lines are, and so 24 sometimes this is a legal point. Section 55 of the Data 25 Protection Act says you have a public interest defence.</p> <p style="text-align: center;">Page 74</p>	<p>1 Q. I've received a message, Mr Davies. It's no fault of 2 anybody's. I think you're going slightly too fast for 3 our transcriber. 4 A. Sorry. I'll try to slow down. 5 Q. One notch only. Your evidence is coming across very 6 clearly, but it does have to be written down. 7 A. Okay. 8 Q. Can I seek to analyse what you've just said in this way. 9 Is the problem that in many cases you don't know where 10 the public interest lies because you don't know what the 11 truth of the story is or you don't know where your 12 investigations might lead, and so -- 13 A. No. 14 Q. No? 15 A. That's not the problem. The problem is that we don't 16 know where the boundary line is, so ... 17 Well, one way of approaching it is this. Different 18 journalists have completely different definitions. So 19 people from the News of the World will tell you, in all 20 sincerity, that it was in the public interest that they 21 exposed Max Mosley's sex life. I profoundly and 22 sincerely disagree with them. I do not think that was 23 in the public interest. 24 Now, I understand that the courts came down, so to 25 speak, on my side of the argument. They still haven't</p> <p style="text-align: center;">Page 76</p>

<p>1 persuaded those other journalists that they're wrong. 2 They sincerely believe that the boundary line is in 3 a different place and there have been some cases -- for 4 example, the John Terry case -- where the courts 5 themselves have danced on both sides of the line, at 6 first saying the story about John Terry having an affair 7 is confidential and then jumping over the line and 8 saying, "No, actually, it's in the public interest that 9 this be disclosed", and if the courts aren't clear, how 10 am I supposed to be the clear, the hack with the 11 notebook? 12 Q. Yes. 13 A. It's not about not knowing the details of the story; 14 it's about not knowing what the rule is in operational 15 terms. Does that make sense? 16 Q. It does and it doesn't because you, of course, are not 17 writing this type of story. You're writing a different 18 type of story. Are you able to assist us with perhaps 19 even a hypothetical example or an accurate example, 20 sufficiently anonymised, where the moral dilemma or the 21 ethical dilemma is laid bear for us? 22 A. Well, we had a huge problem with the Wikileaks stuff. 23 Because in the middle of all this phonehacking, I went 24 off and persuaded Julian Assange to give all this 25 material to the Guardian and the New York Times and</p> <p style="text-align: center;">Page 77</p>	<p>1 he would acknowledge the validity of that defence. 2 Is this making sense? 3 LORD JUSTICE LEVESON: Yes, I understand exactly what you're 4 saying. 5 A. There's another example I've just thought of. We have 6 to be a bit careful about this because this is 7 information that's not been published. About six years 8 ago, there was a senior politician in this country whose 9 child attempted suicide. This is a story which we have 10 never published and it's very, very debatable as to 11 whether or not we should have done. You will hear 12 journalists debating it because it became politically 13 significant for that politician's career that the child 14 had done this, and yet we never reported it. 15 Or another one: should we or should we not have 16 reported the fact that Prince Harry was fighting in 17 Afghanistan? That's probably a better example. You 18 remember this? Prince Harry was sent to Afghanistan. 19 Before he went, the army and the palace called in 20 newspapers and said, "This is what we're doing. We're 21 going to send Harry to Afghanistan. Will you please 22 black it out, not report it?" And newspapers agreed not 23 to publish it on the basis that if they did, it would 24 bring down extra fire on him and the other people in his 25 squadron and we didn't want to be responsible for that.</p> <p style="text-align: center;">Page 79</p>
<p>1 Der Spiegel, and it rapidly became apparent that that 2 material contained information which could get people on 3 the ground in Afghanistan seriously hurt. They were 4 implicit identified as sources of information for the 5 coalition forces. 6 I raised this with Julian very early on and he said, 7 "If an Afghan civilian gives information to Coalition 8 forces, they deserve to die. They are informers. They 9 are collaborators." And there were huge tussles between 10 the journalists and him -- actually, maybe this isn't 11 a terrible good example because I would say emphatically 12 it's absolutely clear that we couldn't publish that 13 information and didn't, but he did. I would love to 14 have been able to go to a specialist advisory body and 15 say, "Where is the public interest here?" in order to be 16 able to show it to him, to persuade him. 17 The other example I gave in the statement was that 18 although the Data Protection Act has a public interest 19 defence, which in principle would allow me, in some 20 circumstances, to blag information from a bank account 21 or the DVLA, I've never ever used it because I wouldn't 22 feel safe, because I don't know where the 23 Information Commissioner is going to say the boundary 24 line is. All I know is that he said in principle he 25 would expect to see very strong public interest before</p> <p style="text-align: center;">Page 78</p>	<p>1 That looks pretty like good thinking. On the other 2 hand, it meant that we were colluding in what then 3 became PR story, because when the story was finally 4 released, the headline was "Harry the hero", but in fact 5 we had offered him an extra layer of protection by doing 6 that, and what I -- 7 LORD JUSTICE LEVESON: I'm not sure that's right, actually. 8 What you'd done was you had given him the same layer of 9 protection that all his colleagues had. You hadn't 10 added an extra layer of protection. 11 A. But the crucial words are -- you said, "I'm not sure 12 that you're r right." 13 LORD JUSTICE LEVESON: Oh yes, that's because I'm polite. 14 A. But I would say, without any hint of politeness, I'm not 15 sure, you see, what was right then. I tell you, my 16 initial reaction to that was that we were right to 17 suppress the information for the safety of those people 18 involved. After I'd thought about it for a few days, 19 I changed my mind and thought it was wrong that we did 20 that and the fact -- the collusion factor was part of 21 it. There's another example -- 22 LORD JUSTICE LEVESON: I'm happy to have more examples 23 because this is tremendously important, and I am going 24 to want to come back at the end of your evidence to talk 25 about the bodies that you think ought to be in place, as</p> <p style="text-align: center;">Page 80</p>

20 (Pages 77 to 80)

<p>1 I'm sure Mr Jay, the structures that you think ought to 2 be in place. But can I just say this: that you've 3 mentioned a story that didn't enter the public domain. 4 I absolutely would not want anybody to report what 5 you've said and then to start reinquiry as to whether 6 that's sensible, as to who it might be or anything. 7 That is not the purpose of this Inquiry and I hope that 8 everybody will take that point extremely seriously. 9 I'm sorry, I -- 10 A. You're right. I also feel the same way. 11 LORD JUSTICE LEVESON: Right. 12 MR JAY: Thank you. 13 Mr Davies, you deal with some other general evidence 14 about systems in the Guardian, which others doubtless 15 will give as well, but can I just touch on one issue in 16 paragraph 9, namely legal advice and in-house lawyer. 17 A. Mm-hm. 18 Q. All your stories presumably are checked? 19 A. Mm-hm. 20 Q. For defamation and accuracy; is that right? 21 A. By the lawyer, yeah, for contempt or any other issues. 22 Q. And someone forms a judgment a priori, I suppose, as to 23 whether a story is potentially legally contentious, in 24 which case the legal scrutiny is more intense, or 25 whether it appears more uncontroversial, in which case</p> <p style="text-align: center;">Page 81</p>	<p>1 and Glasgow. So you've been able to publish newspapers 2 and reach that very, very dense, highly populated 3 market. 4 So you have a hugely competitive national newspaper 5 market. When you compare it to the United States, 6 a population, say, five times the size, scattered over 7 a huge geographical area, so you couldn't possibly print 8 a newspaper in New York, put it on a train and reach LA. 9 So they grew up with city papers, not national papers, 10 by and large, and you get one or two in each city. 11 I hope this is relevant, but if you look at our 12 national newspaper market, the first -- (a) that is very 13 important. I don't know whether there's a more 14 commercially newspaper competitive market in the world. 15 And within that market, the popular newspapers rely 16 overwhelmingly on selling the papers to earn their 17 income. The broadsheets, as they've always 18 traditionally been called, by contrast rely far more on 19 advertising, selling advertising space to get their 20 income. 21 So within that highly competitive market, it's the 22 popular newspapers that are trying to sell in the 23 millions where that commercial imperative is at its most 24 intense, and it gets passed down through the ranks, as 25 I think Richard was trying to describe and is often</p> <p style="text-align: center;">Page 83</p>
<p>1 it's -- I wouldn't say cursory, but it's less 2 microscopic; is that right? 3 A. Roughly speaking, yes. 4 Q. In paragraph 11, you deal with ethical issues in 5 general. The key point you're making here perhaps is 6 that the commercial imperatives which drive some 7 journalism are not as clearly in play or in play at all 8 in relation to this particular title. 9 A. This particular ...? 10 Q. Title. In other words, the Guardian? 11 A. Yes. The Guardian is a little bit different to other 12 newspapers because it belongs to a trust. Therefore it 13 doesn't have to generate lots of money to pass back to 14 its shareholders, and I think that that does have 15 a really important knock-on effect on the internal 16 culture of the paper. It's the corollary to what 17 Richard Peppiatt was talking about earlier on, that 18 where you have a highly competitive, commercially driven 19 newspaper, that will get passed down from the chief 20 executive and the management side to the editor, down 21 through the desks and to the reporters. In a way, all 22 this story starts with geography. You happen to have in 23 this country a population of 50 to 60 million people who 24 for decades have been within a train ride's distance -- 25 within an overnight's train ride's distance of London</p> <p style="text-align: center;">Page 82</p>	<p>1 reinforced which the bullying which I have a referred 2 to. 3 The broadsheets have less commercial imperative. 4 Still they have to sell copies to justify their 5 advertising income, but not as many copies. It isn't as 6 intense and within that less intense end of the market, 7 a newspaper like the Guardian that's owned by a trust is 8 less intense again in its commercial pressure. It is 9 nonetheless there -- we have to survive -- but it's 10 mitigated. 11 Does that make sense? 12 LORD JUSTICE LEVESON: Yes, certainly. Again, I'm 13 interrupting. I shouldn't do that. But at one stage 14 I'm going to want you to talk about the different 15 imperatives, if you can, that face broadsheets like the 16 Guardian, which has one type of audience, and the 17 mid-market or tabloid end, which has a different type of 18 audience, sells many, many more copies, and whether the 19 same considerations which you've been discussing really 20 apply to the different types of story that these 21 different newspapers promote. 22 A. But do you want me to talk about that now or -- 23 LORD JUSTICE LEVESON: Well -- please do. 24 A. To take you up on -- because I think I've given the 25 answer already, which is that the commercial</p> <p style="text-align: center;">Page 84</p>

<p>1 considerations are reduced in the broadsheet paper, and 2 in particular the broadsheet paper owned by the trust. 3 What I'm arguing for is that -- journalism doesn't begin 4 with checking facts. There's a prior stage of selective 5 judgment. What subjects should we cover? Having 6 decided to cover this subject, what angle should we 7 take? What priority do we give it in the bulletin or 8 the paper? At what length, with what language? This is 9 all highly selective. How should we make those 10 selective judgments? Overwhelmingly, they are made on 11 commercial grounds. So we want the story which is quick 12 and cheap to do, which is why we recycle agency copy and 13 other people's stories. We want the story that will 14 sell papers, so therefore you pick the sexiest possible 15 way of telling it.</p> <p>16 The problems that are associated with that I think 17 spread across the spectrum. I'm not exempting the 18 Guardian from problems. We have run stories which were 19 clearly false. The Jersey children's home -- do you 20 remember that, a couple of years ago -- where the idea 21 was that the police had evidence that children had been 22 killed and buried in the ruins of an old children's home 23 on the isle of Jersey. That's a classic of what Richard 24 was trying to describe earlier. The evidence for the 25 truth of that proposition is screaming its falsehood.</p> <p style="text-align: center;">Page 85</p>	<p>1 LORD JUSTICE LEVESON: Yes, I understand. 2 A. Okay. 3 LORD JUSTICE LEVESON: Now I put the reason for my question, 4 because I have been -- "criticised" is not too high 5 a word -- for approaching the issue without tabloid 6 expertise, and I'm keen to understand the extent to 7 which the issues -- it may be the subject matter is 8 different, but the issues should be different whatever 9 title you're working for. Do you understand the point 10 I'm making? 11 A. Yes, okay. There are differences of degree, rather than 12 kind, I suppose is one way of summarising it. 13 MR JAY: Thank you. May I deal with the general issue in 14 relation to sources. This is paragraph 14 of your 15 statement. 16 A. Mm-hm. 17 Q. You make it clear that you never pay your sources for 18 their assistance, and in the middle of the page: 19 "Similarly, I have never come across the Guardian 20 paying police, public officials or mobile phone 21 companies." 22 A. Mm-hm. 23 Q. That's your direct experience, is it, Mr Davies? 24 A. Yes. Well, yes, it's a negative experience, isn't it, 25 but it is mine.</p> <p style="text-align: center;">Page 87</p>
<p>1 So, for example, the police said, "We have been looking 2 into the ruins of this building and we have found 3 a cellar which is exactly like the cellar which is 4 described by our survivor witnesses." It's "very dark". 5 Cellars are dark. It means nothing. Then they said, 6 "And in this cellar we found a bath", and it's quite 7 alarming, this, the sort of hints of torturing. "It's 8 actually bolted to the floor", as though everybody's 9 bath was mobile. It's silly. It doesn't make any 10 sense.</p> <p>11 So then the problem that occurred on all newspapers 12 across the whole spectrum is it's too good a story to 13 knock down. So it's exactly what Richard was saying. 14 A reporter from any paper is sent out to Jersey to 15 follow up on this story. The reporter who rings up and 16 says, "Actually, this is crap, there's just no evidence 17 for this at all", they will not be thanked. It's 18 a great story.</p> <p>19 I actually ran a piece in the Media Guardian, 20 saying, "What are we talking about?" I was speaking 21 about this in public meetings. I actually bet one 22 meeting my left finger if the story was true, but 23 nevertheless we carried on running it.</p> <p>24 So it's a problem that spreads to some degree across 25 Fleet Street, commercial judgments.</p> <p style="text-align: center;">Page 86</p>	<p>1 Q. Then you say: 2 "For the sake of completeness ..." 3 That occasionally a meal or a drink is bought, as 4 you might expect. The question is probably so obvious 5 it goes without saying, but what are the ethical 6 ramifications of paying for stories? 7 A. Generally speaking? 8 Q. Yes, and why don't you pay for stories? 9 A. I've said in the statement that I think the issue is not 10 primarily ethical. I'm not one of those people who says 11 chequebook journalism is inherently evil. I think it's 12 a practical question. So if you go back to my business 13 about the human sources on that primary route, the key 14 thing we have to do -- sometimes easy, sometimes 15 terribly difficult -- is to motivate people to talk to 16 us. People of -- like I have to be able to get the 17 12-year-old child prostitute to talk to me, and the 18 police officer who is trying to arrest her, and the 19 social worker who can't control her, and the pimp who's 20 taking money off her. All of them I have to persuade to 21 talk to me, and the way to do that with success is to 22 find a motivation and build a relationship. It's the 23 most exciting, interesting thing in reporting. If you 24 pay -- and this is why I say it's practical, not 25 ethical -- (a) there is a chance that you're giving</p> <p style="text-align: center;">Page 88</p>

<p>1 these people a motive to fabricate, to earn their money, 2 and (b) at best, you get a very limited amount of 3 co-operation.</p> <p>4 So there have been occasions when I've been, so to 5 speak, competing with tabloid journalists for the same 6 story and they've gone in with their chequebooks. If 7 you could quantify it, they've got the first couple of 8 pages of the story but I got the whole chapter because 9 people decided they want to help. That, I think, is 10 where the problem is. You see, practical rather than 11 ethical.</p> <p>12 There's a subsidiary point where clearly if you -- 13 if a journalist or anybody else is offering to pay money 14 in contravention of the Bribery Act, then there's 15 a legal problem, clearly.</p> <p>16 Q. As regards the specific example you've given about child 17 prostitution -- you cover this in detail in 18 paragraph 20, which is 03000. You make it clear that in 19 order properly to investigate that case, you were paying 20 no more than £20 to the children involved, which is, of 21 course, equivalent to the pathetically small amounts 22 they would obtain from those purchasing their services.</p> <p>23 A. Yes, it was the only example I could think of where I'd 24 paid people. It isn't actually paying to motivate them. 25 It's paying to -- I don't know, it was partly to</p> <p style="text-align: center;">Page 89</p>	<p>1 A. Yes. The story wasn't offered to me. It was offered to 2 another reporter, who said, "What do you think?" And 3 I said I do not think we should be reproducing anything 4 which rebreaches this man's privacy, so let's not do it. 5 It's a judgment call. I don't know --</p> <p>6 LORD JUSTICE LEVESON: It's been one of the great problems 7 that I've had for the last week, that I've been inviting 8 people to breach their own privacy by telling me about 9 breaches of privacy.</p> <p>10 A. It is a problem, isn't it?</p> <p>11 MR JAY: Then the third example, where the public interest, 12 as it were, fell the other way, is the --</p> <p>13 A. Oh yes.</p> <p>14 Q. -- piece you wrote along with a colleague, Amelia Hill, 15 in the Guardian on 4 July 2011, breaking the story about 16 the hacking of Milly Dowler's voicemail.</p> <p>17 A. Yes.</p> <p>18 Q. We have that, I'm sure everybody has seen it, under our 19 tab 3.</p> <p>20 A. Mm-hm. There the question was whether or not we were 21 digging up the grief of the family again by publishing 22 this story.</p> <p>23 Q. We know what the outcome of the balancing exercise was, 24 but why, in a nutshell, did you come down in favour of 25 publication?</p> <p style="text-align: center;">Page 91</p>
<p>1 compensate them for the money they weren't earning, but 2 I said in here too, I just -- I'd rather they got 20 3 quid from me than from some businessman doing something 4 horrible on his way home. I mean, these are children 5 we're talking about.</p> <p>6 Q. On public interest -- you've covered this already -- 7 paragraph 21, the bottom of the same page, you refer to 8 the kind of ethical mist. You've told us about the 9 difficulties with Section 55, although no journalist has 10 ever sought to rely on it.</p> <p>11 But you do provide us with two specific or three 12 specific examples on the next page, 03001.</p> <p>13 A. Oh yeah, I'd forgotten about these.</p> <p>14 Q. The first of these is so famous we need not dwell on it 15 overmuch, but this is an internal News of the World 16 email which you supplied to the CMS Select Committee 17 in July 2009.</p> <p>18 A. Yes, and the point is I redacted --</p> <p>19 Q. You redacted the transcripts.</p> <p>20 A. Yes, to protect the privacy of those involved.</p> <p>21 Q. Then you refer, in the next example: 22 "The Guardian was offered a story about a former 23 cabinet minister whose voicemail was hacked." 24 You felt that that went too far in terms of a breach 25 of privacy?</p> <p style="text-align: center;">Page 90</p>	<p>1 A. This is tricky stuff, but -- so I think first, what we 2 were disclosing was so important that we needed to find 3 some way of getting it into the public domain. On the 4 other hand, you know, the family have been through hell. 5 I really was worried about digging it up. So the step 6 that we took to try to reduce the impact for the family 7 was that via Surrey Police we sent a detailed message 8 saying, "Look, here's what we are preparing by way of 9 the story. This is just to alert you to the fact that 10 we're expecting to publish this within the next 48 11 hours."</p> <p>12 I think they were actually on holiday but they came 13 back, I think, in time to get that message. So that was 14 the best we could do in the circumstances. I think it 15 was absolutely was right to get it into the public 16 domain, and I think Mrs Dowler gave evidence about this, 17 that she was upset by the story, which is -- you know, 18 I wish she hadn't been upset and we did what we could to 19 soften the impact by sending that detailed warning.</p> <p>20 Q. You refer on the second page of this article --</p> <p>21 A. What's the tab number?</p> <p>22 Q. Tab 3 of the bundle we've prepared. Level with the 23 upper hole punch, Mr Davies.</p> <p>24 A. Yes.</p> <p>25 Q. The deletion of the messages. You say, four lines down:</p> <p style="text-align: center;">Page 92</p>

<p>1 "According to one source, this had a devastating 2 effect." 3 We heard about that directly from the Dowlers. 4 A. Yes. 5 Q. You're not going to tell us who that source is, so 6 I won't even ask you, but -- 7 A. It's better not to. 8 Q. Thank you. A bit later down, you refer to a senior 9 source familiar with the Surrey Police investigation. 10 A. Yes. 11 Q. Can I ask you this question, without naming anybody: do 12 you happen to know who it was who hacked into 13 Milly Dowler's voicemails? 14 A. There's two stages to this. The facilitator was 15 Glenn Mulcaire. There's a misunderstanding, I think, 16 around the way that he operates. He doesn't actually, 17 on the whole, do the listening to the messages himself. 18 Most of that is done by the journalist themselves. 19 Mulcaire's job was to enable them to do that where there 20 was some problem, because he's a brilliant blagger, so 21 he could get information, data, from the mobile phone 22 company. And occasionally I think he did special 23 projects. I think perhaps the royal household would be 24 an example. 25 So if you ask who hacked Milly's voicemail, the Page 93</p>	<p>1 that may or may not chime with evidence we heard last 2 week. Indeed it probably does. But at the bottom of 3 the page, question 434, you were asked: 4 "How effective do you think the PCC is in upholding 5 standards?" 6 Without reading this out, Mr Davies, what in summary 7 did you say to this Inquiry about the effectiveness of 8 the PCC? 9 A. In relation to the McCanns specifically? 10 Q. More generally, I think. 11 A. I think that the history of the PCC's performance 12 undermines the whole concept of self-regulation. 13 Re-reading this evidence, because you sent it to me at 14 the end of last week, I noticed that I was speaking up 15 for self-regulation, but I wouldn't any more. I don't 16 think this is an industry that is interested in or 17 capable of self-regulation. 18 I think probably at this point I was at the edge of 19 that conclusion, but hadn't quite come to it. I think 20 I felt that perhaps the problems which I'd seen in the 21 PCC, particularly with handling the original outbreak of 22 phone hacking in 2006/7, the McCann case and the 23 Max Mosley case, might have been the result of the 24 particular chair and the particular director, and for me 25 there was a turning point in -- this is April '09. We Page 95</p>
<p>1 answer is that Mulcaire facilitated the hacking by one 2 or more News of the World journalists and our 3 understanding of the facts is that it was one or more of 4 the News of the World journalists who then had to delete 5 the messages in order to enable more to come through. 6 Q. That's helpful. I think that's as far as we can 7 properly take it but it explains one or two statements 8 which have been put in the public domain at the time 9 that the Dowlers' evidence was given to this Inquiry. 10 Before I come to the dark arts and your book, may 11 I deal with a couple of points in relation to the PCC. 12 Under tab 2, you'll find, I hope, some evidence you gave 13 to the Select Committee on 21 April 2009, together with 14 Professor Greenslade. You were, as it were, a double 15 act on that day and I think he's in the room today. We 16 can read that carefully for ourselves. Indeed, some of 17 us have done beforehand. 18 Just alight upon something you've said. At page 131 19 at the top right-hand side, Mr Davies. 20 A. Mm-hm. 131 the top right, yes. 21 Q. Professor Greenslade talks about the McCanns. 22 A. Are you sort of there in the middle of that column? 23 Q. Yes. 24 A. The McCanns were a classic case? 25 Q. Yes. Just noting that and we'll skim-read that, but Page 94</p>	<p>1 published the Gordon Taylor story in July, and 2 in November, the PCC published the second report on 3 phone hacking. Different personnel, different chair. 4 The former -- well, I think the same director, but the 5 man who is now director was involved in the production 6 of that report, Stephen Abell, who I regard as a good 7 man. 8 But the report was terrible. Just an awful piece of 9 work. You know, my editor resigned from the code 10 committee in protest. He went on the radio and said, 11 "This is worse than useless", which I think was an 12 understatement. And that shifted me across the line. 13 I just think -- I do not trust this industry to regulate 14 itself. I say this as I love reporting. I want us to 15 be free. You have a huge intellectual puzzle in front 16 of you. How do you regulate a free press? But it 17 obviously doesn't work. We're kidding ourselves if we 18 think it would, because it hasn't. 19 Q. This is the report, which is no longer on the PCC 20 website, which referred to, I paraphrase, some of the 21 Guardian's more dramatic claims not being borne out by 22 the evidence or words to that effect? 23 A. Yes, and along the way there was some slippery 24 behaviour, slippery handling of evidence. 25 Q. Now may I come to Flat Earth News. Page 96</p>

<p>1 A. Mm-hm. 2 LORD JUSTICE LEVESON: Just before you start, it's not just 3 an intellectual puzzle, Mr Davies, because it has to 4 work and it has to work for everybody. It has to work 5 for the press and it has to work for the public. 6 A. Yes. 7 LORD JUSTICE LEVESON: So it has some real practical issues. 8 A. Yes. I think the point you've just made there is 9 terribly important, that in the past what has tended to 10 happen is that whatever debate may have occurred -- for 11 example, in the Calcutt commissions, the model that has 12 emerged has been dominated by the needs and thinking of 13 Fleet Street, and no system that is designed within that 14 shape is going to succeed and be stable. It has to take 15 account of the victims of the media. That's the crucial 16 first step. We have to stop only thinking about the 17 freedom of the press and build in satisfactory ways for 18 those people to get remedy. 19 LORD JUSTICE LEVESON: Well, I hope that that thinking has 20 started, and I was impressed by some of the 21 contributions in that regard that were made at the 22 seminars. 23 A. Mm-hm. 24 LORD JUSTICE LEVESON: Because it's something that your 25 business has to think about and help me work out.</p> <p style="text-align: center;">Page 97</p>	<p>1 A. Yes. This is a memo that I wrote for the Select 2 Committee that wasn't published and then they 3 eventually, months later, put it on their website and at 4 some moment, the Guardian ran it on the Guardian's 5 website. 6 Q. Can I just ask you about the third page, please? 7 A. Third page. Yes. 8 Q. Just to understand the source of your information, in 9 general terms to the extent to which you can assist, but 10 if there are sensitivities here, please tell me -- you 11 say at the top that: 12 "Paperwork held by the CPS shows that police began 13 their investigation in January 2006 by analysing data 14 held by phone companies. This revealed a vast number of 15 victims, indicated a vast array of offending behaviour, 16 but the prosecutors and police agreed not to investigate 17 all the available leads." 18 How do you know that? 19 A. Because a good human source showed me that paperwork. 20 Q. Fair enough. The same presumably applies to the next 21 paragraph: 22 "In addition, the CPS paperwork shows that 23 prosecutors were persuaded by the police to adopt 24 a policy of ringfencing evidence so that even within the 25 scope of the limited investigation, there would be</p> <p style="text-align: center;">Page 99</p>
<p>1 A. Mm. We're going to come to this later, did you say? 2 LORD JUSTICE LEVESON: I think we are, yes. 3 A. All right. 4 MR JAY: I have it in mind as sort of the -- not the coda to 5 your evidence, but at a later stage early in the 6 afternoon. 7 A. Okay. 8 Q. Sorry, but before I come to Flat Earth News, may I just 9 ask you a couple of questions about one piece, which is 10 under tab 5 in the bundle, Mr Davies. 11 A. Yes. 12 Q. It's a piece you wrote on 27 January 2011 in the 13 Guardian. 14 A. Hang on, there's lots of pieces in this tab. 15 Q. Yes. 16 A. What's it about? 17 Q. It's called "News of the World phone hacking, Nick 18 Davies' email to MPs". It's about a dozen pages into 19 tab 5? 20 A. I've found it. 21 Q. It's a six-page piece. I think what you're doing 22 here -- but correct me if I'm wrong and it's clear that 23 this is what you're doing. You sent some information to 24 the Select Committee and you're just publishing it in an 25 article in the Guardian; is that right?</p> <p style="text-align: center;">Page 98</p>	<p>1 a further limit on the public use of evidence in order 2 to ensure that sensitive victims would not be named in 3 court." 4 So -- 5 A. Same source. 6 Q. That's the same source? 7 A. Yes. 8 Q. Then the next paragraph it's clear that the Guardian 9 made use of the Freedom of Information Act some 10 considerable time later, in January 2010, and that 11 demonstrated that at that stage there were 4,332 names 12 or partial names of people and in whom the men had an 13 interest. 14 The "men" you're referring to are Goodman, Mulcaire 15 and then generically one other man who has not been 16 charged; is that right? 17 A. Yeah. In August 8, 2006, the police arrested 18 Glenn Mulcaire, Clive Goodman and one other person, 19 whose identity I know but he's never been named in the 20 public domain. They seized material from those three. 21 Q. Indeed. 22 A. And my freedom of information request was a request for 23 a statistical summary of what was in that seized 24 material from those three people. And I put the 25 application in way back and Scotland Yard breached the</p> <p style="text-align: center;">Page 100</p>

<p>1 statutory requirement to reply within 20 working days. 2 That's why it didn't come through until January. 3 Q. We can guess what the primary source of the information 4 was. It was Mr Mulcaire's notebook, presumably, was it? 5 A. Yes, I think it would be. There's a little bit of 6 Goodman and a little bit of the third guy, but it's 7 going to be mostly Mulcaire. 8 Q. And so we understand your methods, if I can so describe 9 it, and you've told us about this earlier, the Freedom 10 of Information Act is a tool at your disposal. How 11 often, approximately, have you used it in order to 12 obtain information in the context of the phone hacking 13 issue? 14 A. Oh, on the phone hacking? Only two or three times. And 15 it got very complicated because they were being blocked 16 and knocked back and I seemed to get reviews and I had 17 to take an appeal to the ICO. I would think it's 18 a maximum of three different applications, but it may 19 have been that they started as only one or two and split 20 as different blockages occurred in the route. You see 21 what I mean? One went all the way to the 22 Information Commissioner's office before they gave in. 23 Q. Flat Earth News. 24 A. Mm-hm. 25 Q. Chapter 7.</p> <p style="text-align: center;">Page 101</p>	<p>1 of information applications that were made by 2 Michael Ashcroft, Lord Ashcroft, which then went into 3 the public domain when they were replied to, so they're 4 not mine, they were Lord Ashcroft's, and thirdly, direct 5 contact between myself and a member of the Whittamore 6 network. Possibly two members. 7 Q. Thank you. 8 A. And also I pestered the Information Commissioner's 9 office until they were blue in the face for bits and 10 pieces. 11 Q. And they -- 12 A. Gave me bits and pieces, but not as much as I wanted, 13 which is why the pestering went on. So it's that 14 overlap thing again. 15 LORD JUSTICE LEVESON: That's what journalists do. 16 MR JAY: You'll understand, Mr Davies, that on Thursday 17 we're going to be covering all of this with Mr Thomas. 18 A. Yes. 19 Q. Including Freedom of Information Act requests and an 20 analysis of the 13,343 requests you refer to at 21 page 260, so we're going into it all in considerable 22 detail. 23 A. Yes. 24 Q. It may not be necessary to cover all the ground with 25 you.</p> <p style="text-align: center;">Page 103</p>
<p>1 A. Yes. 2 Q. We've photocopied relevant pages. I think they have 3 been provided to the technician, but if not, we'll 4 manage without them. At page 257 -- 5 A. 257? That's before. Hang on, 257? Are you sure? 6 Q. Between, sorry, it's between 256 and 259, doesn't 7 actually have a 257 at the bottom, but it's part 4 8 "Inside Story", "The Dark Arts" starts at 259. 9 A. Right. 10 Q. You caption it with a quote from Alastair Campbell, who 11 will explain what he meant by that in more detail 12 tomorrow. 13 A. Okay. 14 Q. 259, "The Dark Arts". You start off with a review of 15 the Information Commissioner's work, the raids in 16 relation to Mr Whittamore, as I was summarising to the 17 Inquiry when I opened the formal part of this Inquiry on 18 14 November. 19 Do I have this right, Mr Davies, that quite a lot of 20 this is material in the public domain, but it was 21 boosted or bolstered and substantiated by Freedom of 22 Information Act requests which you made of the 23 Information Commissioner's office? 24 A. Not quite right. So you have the two reports on 25 Operation Motorman that were published in 2006, freedom</p> <p style="text-align: center;">Page 102</p>	<p>1 I'm asked to point out this to you, though. At the 2 bottom of page 262, if you just bear with me. You say 3 that the judge, who is His Honour Judge Samuels QC, 4 asked a highly relevant question. This is when the case 5 reached the -- 6 A. Blackfriars Crown Court. 7 Q. -- Crown Court at Blackfriars, and the question was 8 words to the effect: 9 "Where are the journalists?" 10 A. Mm-hm. 11 Q. You say at the bottom of the page: 12 "The prosecutor could not explain." 13 A. Yes. 14 Q. But I'm asked to put to you that the prosecutor could 15 and did explain that some journalists had been 16 interviewed and the decision was taken that there was 17 insufficient evidence to prosecute. Were you aware of 18 that? 19 A. I am aware that journalists were interviewed. That's 20 a statement of the fact; it isn't an explanation as to 21 why neither they nor the newspapers were prosecuted. Do 22 you see? 23 Q. Yes. 24 A. So that the prosecutor is simply restating the fact that 25 this hasn't happened. The question is: Why? That's one</p> <p style="text-align: center;">Page 104</p>

26 (Pages 101 to 104)

<p>1 of the things I was pestering the Information 2 Commissioner's office about and this is one of the 3 things this they did help me on. They explained, which 4 did not come out in court -- and correct me if I've got 5 this wrong, but I'm pretty sure that I'm right -- that 6 when they were looking at this prosecution, they said to 7 themselves, "If we prosecute the Fleet Street 8 newspapers, first, they will hire very expensive QCs and 9 we will have to do the same; secondly, they're going to 10 tie us up in endless pre-trial argument, which again is 11 going to be very expensive. We simply don't have the 12 legal budget to do this." 13 So that explanation, which was given to me by the 14 ICO subsequently, was not given, as I understand it, in 15 court. The explanation, do you see, as against the -- 16 somebody's shaking their head behind you. I don't know 17 whether it's -- 18 Q. Whether they are or not, I'm concentrating on what 19 you're saying. 20 LORD JUSTICE LEVESON: Don't you worry about anybody else. 21 A. Oh, sorry. 22 LORD JUSTICE LEVESON: They'll make their views clear at 23 some stage. 24 A. What I'm giving you is an accurate summary of what the 25 ICO told me, and in answer to your question, the</p> <p style="text-align: center;">Page 105</p>	<p>1 A. The specific issue being: why didn't you prosecute the 2 newspapers? 3 Q. Yes. 4 A. Yes. Have you -- am I allowed to ask, have you had 5 access to the raw material that the ICO obtained from 6 the Whittamore network? 7 Q. I don't normally answer questions. 8 A. I'm sorry. 9 LORD JUSTICE LEVESON: It works the other way around here. 10 A. What I'm trying to say is I did have access to that, as 11 you can tell from some of the stories I wrote on all of 12 it two years ago, and I'm not a lawyer, I'm 13 a journalist, but it seemed to me surprising that there 14 hadn't been a prosecution of the newspapers as well as 15 the PIs. 16 Q. The Inquiry has had access and the core participants 17 have seen it to material provided by the Information 18 Commissioner's Office which has not been made available 19 for (inaudible). 20 A. Okay. 21 Q. May I bring you forward, but possibly back in time, to 22 page 266 of "The Dark Arts" -- 23 A. Yes. 24 Q. -- where you embark upon a review of, really, the next 25 20 pages or so of a range of matters which, if you look</p> <p style="text-align: center;">Page 107</p>
<p>1 explanation for the fact of the non-prosecution of the 2 newspapers, I believe, was not expressed in court. 3 MR JAY: Are you able to tell us -- but if you can't, please 4 confirm it -- who it was at the Information 5 Commissioner's office who give you that explanation. 6 A. You know the truth is I cannot remember whether I spoke 7 to them on the basis that I wouldn't name them or not, 8 but it was an authoritative figure who knew what they 9 were talking about. I could check with the ICO and come 10 back to you. I think it's probably all right, but 11 I don't want to break the terms of the conversation. 12 I simply can't remember. Do you want me to follow up on 13 it? 14 Q. Not at this stage, Mr Davies. It's something that I can 15 take up with the relevant people on Thursday. 16 A. Okay. 17 Q. I'm just making a note on the transcript so that it 18 doesn't fall within any gaps, in case I don't remember 19 to. 20 You deal generally with the issue of journalists 21 over the next few pages to the top of page 265. 22 A. Yes. 23 Q. Presumably, Mr Davies, you, amongst others, would invite 24 the Inquiry to take this up with the former Information 25 Commissioner when he gives evidence on Thursday?</p> <p style="text-align: center;">Page 106</p>	<p>1 at page 266, about a third of the way down, you say 2 this: 3 "It's never easy to look back from the midst of the 4 epidemic and see how the germ first started to spread. 5 There has always been a little dirty play, a little 6 illegal stuff going on in the shadows of Fleet Street." 7 And what you undertake here, do I have this right, 8 Mr Davies, is a sort of historical review which brings 9 a narrative forward, starting perhaps from the 1970s 10 when the Commissioner at Scotland Yard, of course, was 11 Sir Robert Mark, when he carried out a massive clean-up 12 operation, as we all know, and you bring the story 13 forward to more or less the present day; is that right? 14 A. That's what I was trying to do, yes. 15 Q. So I can understand the position then, when you mention 16 Z, at page 267 -- 17 A. Yes? 18 Q. -- at about what point in time are we talking about? Is 19 this the 1980s or some different time period? 20 A. The timeframe of Z's activities on the behalf of 21 Fleet Street? 22 Q. Yes. 23 A. Begins in the early 1980s, I think 1982, but early 24 1980s, and stretches forward into the very recent past. 25 My belief is that he was still active at the time that</p> <p style="text-align: center;">Page 108</p>

<p>1 I was researching and writing the book.</p> <p>2 Q. The nature of your information in relation to Z, can</p> <p>3 I ask you this question: is there anything here in the</p> <p>4 book which derives directly from Z himself? If you</p> <p>5 don't want to answer that, just say so.</p> <p>6 A. No, it doesn't come from Z himself. It's a combination</p> <p>7 of exactly those two primary routes: public domain and</p> <p>8 human. So, yeah.</p> <p>9 Q. In terms of quantity, the number of human sources, are</p> <p>10 we talking the same sort of numbers as you've mentioned</p> <p>11 previously, about a dozen, or are we talking some</p> <p>12 different number?</p> <p>13 A. Okay. First of all, this guy is very well-known, so</p> <p>14 I covered -- when he was originally tried for police</p> <p>15 corruption, I covered his trial. His activity for</p> <p>16 newspapers is something I already knew about, just</p> <p>17 because I'm a reporter and was aware of him. So that's</p> <p>18 a slightly unusual aspect of it, that I'd already come</p> <p>19 across him.</p> <p>20 Sources? Gosh. I would think you have five or six</p> <p>21 individuals who I spoke to during the research of the</p> <p>22 book about his activity, and -- I think it's all right</p> <p>23 to say this -- one of the things that happened was</p> <p>24 after -- I told you how I stumbled into this, people</p> <p>25 started talking about him: "Christ, I remember him". So</p> <p style="text-align: center;">Page 109</p>	<p>1 particular individual has been the subject of Panorama</p> <p>2 programmes, certainly one programme, I've seen it.</p> <p>3 You're not the only one -- not to diminish what you're</p> <p>4 saying -- who covers him as well.</p> <p>5 A. No.</p> <p>6 Q. Can I ask you though, please, about 271, the second</p> <p>7 paragraph. When you say that these two were merely the</p> <p>8 brand leaders:</p> <p>9 "By the mid-1990s, Fleet Street was employing</p> <p>10 several dozen different agents to break the law on its</p> <p>11 behalf. Most were private investigators, a few were</p> <p>12 ordinary civilians who developed the knack of blagging</p> <p>13 confidential official out of banks and phone companies."</p> <p>14 Then you refer to someone in Ruislip who was</p> <p>15 regularly conning ex-directory numbers and itemised</p> <p>16 phone bills out of BT.</p> <p>17 Again, please, so that we understand the evidential</p> <p>18 strength of this, the sources of your information?</p> <p>19 A. Okay. So there you've got reporters from a lot of</p> <p>20 different newspapers talking about their use of private</p> <p>21 investigators, you've got some of the investigators who</p> <p>22 I referred to, the kind of senior members of the</p> <p>23 profession, helping me out, and you have some public</p> <p>24 domain material. So the person from Ruislip was</p> <p>25 convicted in the public domain and there were records of</p> <p style="text-align: center;">Page 111</p>
<p>1 I then contacted Scotland Yard and asked somebody I know</p> <p>2 there who is reasonably senior, "Will you brief me on</p> <p>3 this?" I think one of the things that had emerged --</p> <p>4 I have to be careful not to identify -- along the way</p> <p>5 there had been an operation by Scotland Yard to</p> <p>6 prosecute this individual, Z, to stop him acting as</p> <p>7 a go-between between newspapers and corrupt officers,</p> <p>8 and therefore that was a clear signal that there were</p> <p>9 people in Scotland Yard who were aware of his activities</p> <p>10 and trying to stop him. So I tried to get into that</p> <p>11 part of the Yard and somebody senior came and met me in</p> <p>12 a hotel lobby and spent several hours helping me out</p> <p>13 with the history of this man's activity as they knew it.</p> <p>14 So it's the sort of four, five, six reporters during</p> <p>15 the research, the Yard briefing, various public domain</p> <p>16 sources, there are two trials here -- one of which</p> <p>17 I covered, the other which I wrote about; the second</p> <p>18 trial comes from the attempt to stop him -- and then my</p> <p>19 own background knowledge.</p> <p>20 Q. Page 269, you mention a particular private investigator.</p> <p>21 A. Yes. Right up the top?</p> <p>22 Q. Yes.</p> <p>23 A. Yeah, gotcha.</p> <p>24 Q. The Inquiry doesn't really wish to go into the detail of</p> <p>25 this at this stage, although it's right to say that this</p> <p style="text-align: center;">Page 110</p>	<p>1 that trial occurring.</p> <p>2 I'm pretty sure that there was background in the ICO</p> <p>3 as well. I don't know whether it was in the Motorman</p> <p>4 reports or one of the other -- I think it might be in</p> <p>5 the first Motorman report, there was quite a lot of</p> <p>6 useful background on scale. This is from memory.</p> <p>7 Q. There are four examples given, which correlate with what</p> <p>8 you're just saying.</p> <p>9 A. -- I haven't read it.</p> <p>10 Q. At the start of the --</p> <p>11 A. Okay.</p> <p>12 Q. Fair enough. The activities of these private</p> <p>13 investigators, have I understood this paragraph</p> <p>14 correctly, that in essence they were carrying out the</p> <p>15 same sort of activities as Mr Whittamore and his team?</p> <p>16 Or were they doing something different?</p> <p>17 A. I think there's a possible -- at least five different</p> <p>18 possible activities. So number one, blagging</p> <p>19 information out of confidential databases. Two, there</p> <p>20 are hints of voicemail hacking coming out. There are</p> <p>21 hints of email hacking coming out. There are hints of</p> <p>22 burglary coming out. And what's the other one? Oh,</p> <p>23 corruption of police officers.</p> <p>24 Q. Ransacking bins?</p> <p>25 A. No, corruption of police officers is coming through</p> <p style="text-align: center;">Page 112</p>

<p>1 quite strong, and -- well, the bins is a rather quirky 2 thing on the side with a quirky bloke, but those five 3 activities are being talked about by reporters. If 4 we're talking just at that basic level of what people 5 are telling me, what the PIs are telling me, what the 6 reporters are telling me, they're covering those five 7 kinds of activities.</p> <p>8 Q. Thank you. The relevance of Z bears particularly on the 9 issue of police corruption, I think; is that right?</p> <p>10 A. Correct.</p> <p>11 Q. We're perhaps in the realm of another module of this 12 Inquiry, but if I could be forgiven for asking you one 13 question about it -- or perhaps not just one, maybe more 14 than one -- are you able to give us any sense of the 15 scale of this activity?</p> <p>16 A. Z's activity?</p> <p>17 Q. In relation to the police.</p> <p>18 A. It's very difficult to quantify it. I mean, I'm not 19 quite sure how cautious we're being about identifying 20 him, but when Scotland Yard attempted to stop him, they 21 mounted a prosecution, there was a trial. The trial did 22 not convict him; it acquitted him. There was some 23 coverage at that time where, for example, it was 24 suggested that every crime reporter in Fleet Street will 25 be drinking champagne tonight and there were crime</p> <p style="text-align: center;">Page 113</p>	<p>1 mid-1990s.</p> <p>2 Q. Possibly a bit earlier, I'm told, because the Mail's 3 offices moved to Kensington in 1989, and therefore if 4 there's drinking at the Wine Press in Fleet Street, it 5 must have been before then. Is that possible?</p> <p>6 A. You've just identified the title. No, that doesn't make 7 any sense at all, does it? The Wine Press are an 8 innocent party in this. They're not responsible for 9 what goes on in their bar, but Wine Press was 10 a long-established watering hole for Fleet Street, 11 particularly for Fleet Street crime reporters and police 12 officers, and the fact that one particular newspaper 13 moved several miles to the west doesn't change the fact 14 that that's the pond where the fish are and the reporter 15 from that newspaper is going to go back. Everybody's 16 not going to follow them down the road. I'm confident 17 this is post '89. In fact, I'm confident this is early 18 and mid-1990s, as I described.</p> <p>19 Q. I'm just putting a point to you. You have given the 20 answer and that's fine, Mr Davies.</p> <p>21 How many reporters at the Mail gave you the 22 information you refer to, namely handing over quite 23 substantial amounts of cash?</p> <p>24 A. Do you remember I said there are different layers of 25 detail, but there were three in particular who helped me</p> <p style="text-align: center;">Page 115</p>
<p>1 reporters being quoted saying, "This is a great day for 2 the freedom of the press." If you set this against what 3 reporters and PIs and Scotland Yard themselves are 4 saying about the man's activities, I think it's fair to 5 say that he was involved over a number of years in quite 6 casual activity, carrying cash from newspapers to 7 corrupt police officers, and that was particularly clear 8 from the police point of view, who I think felt really 9 frustrated and angry about what was going on. Because 10 this is not just about breach of privacy. There were 11 examples -- I can't remember whether I've given them in 12 the book, I can remember one of them which I was given, 13 but where active inquiries were impeded by the sale of 14 this information.</p> <p>15 Q. Towards the top of page 272, you refer to a particular 16 title.</p> <p>17 A. Mm-hm.</p> <p>18 Q. You understand that there is a sensitivity about that?</p> <p>19 A. Mm-hm.</p> <p>20 Q. Can I understand, first of all, though, approximately 21 when did the events you describe at this point on 22 page 272 occur?</p> <p>23 A. Hang on. I just have to read it so that I can catch up 24 with you.</p> <p>25 Okay. I think we're here in the early and</p> <p style="text-align: center;">Page 114</p>	<p>1 on that aspect of it. These are former Mail reporters.</p> <p>2 Q. Was it known where the money was going?</p> <p>3 A. Absolutely clearly. This is where it gets terribly 4 difficult because, for example, there was quite a lot of 5 specific detail with this particular story. This is how 6 we got the information. There was a clear indication of 7 who the recipient detective was, so who it is that Z is 8 passing the money to, how much was passed, but that's 9 what I was saying earlier on; it's not just a question 10 of concealing the identity of the journalist. If you 11 disclose the precise detail, then by implication you 12 identify the source.</p> <p>13 I think it's fair to say that the Mail, who we've 14 identified now, are absolutely not alone here in their 15 relationship with Z. I think it was, as I say, casual 16 and widespread.</p> <p>17 Q. Page 273. You deal with one particular matter, namely 18 access to a government database.</p> <p>19 A. Mm-hm.</p> <p>20 Q. The source you refer to with access to a government 21 database, who was that person? I'm not asking you to 22 identify the person, but give us some idea as to the 23 modus operandi here. Can you help us?</p> <p>24 A. As to who's talking to me?</p> <p>25 Q. Yes.</p> <p style="text-align: center;">Page 116</p>

<p>1 A. It says: a reporter who has now left the Mail. Again, 2 it's one of these things where you have a lot of 3 different reporters who have worked there talk about the 4 blagging of confidential data and then different 5 individuals go into different elements of detail on it. 6 Q. Presumably then -- is this right, Mr Davies -- towards 7 the bottom of page 273, it's the same point in relation 8 to the Sunday Times; is that right? 9 A. The point being? 10 Q. That it's probably former Sunday Times reporters who are 11 providing you with the information? 12 A. Yes. Again, you have about a dozen or 15 former 13 reporters who are talking and overlapping to different 14 degrees on different subjects. 15 Q. We note what you say at the top of page 274 about the 16 routine use of private investigators? 17 A. Mm-hm. 18 Q. One expert blagger told you -- have I understood it 19 correctly -- that he was working for the Sunday Times? 20 A. Yes. He's going back a bit. 21 Q. Back to about when? 22 A. I reckon late 80s, that particular person. He's one of 23 your kind of senior figures who doesn't like the way it 24 all took off. 25 Q. Then you refer, towards the bottom of page 274, to Page 117</p>	<p>1 "Lord Ashcroft and another peer, Lord Levy, both had 2 their tax records blagged by somebody who appears to 3 have been working for the Sunday Times." 4 Then to look at Lord Levy in particular: 5 "Bogus calls were made to the Inland Revenue by 6 somebody posing as Lord Levy before the Sunday Times 7 wrote about his tax payments in June 2000 ..." 8 What happened there, I think, is that the Sunday 9 Times put this story to Lord Levy and Lord Levy applied 10 for an injunction to restrain publication. Were you 11 aware of that? 12 A. Sounds familiar. I'm not sure, but it sounds possible. 13 Q. Although in the end, the injunction was refused by 14 a High Court judge on public interest grounds. 15 A. It may well be. 16 LORD JUSTICE LEVESON: Is that a convenient moment, Mr Jay? 17 MR JAY: Sir, it is. We are on track in terms of the 18 overall timetable. I may need to conclude Mr Davies by 19 about quarter to 3. 20 LORD JUSTICE LEVESON: Very good. I just want to remind 21 everybody that although we're obviously looking at these 22 title by title, it is no part of this part of the 23 Inquiry to make decisions of fact about who did what to 24 whom, and I repeat that at various points so that nobody 25 should misunderstand the significance of what we're Page 119</p>
<p>1 a former reporter of the Times who then brought 2 proceedings against an employment tribunal. That's 3 Mr David Connett, is it? 4 A. This is the Sunday Times. Correct, and I sat in on that 5 Tribunal hearing and covered the evidence that came out. 6 So that's public domain again. 7 Q. Yes, and the ruling of the employment tribunal again is 8 a document in the public domain and we'll be looking at 9 it in due course. 10 You deal with someone else, this time the Sunday 11 Telegraph, at page 276. This is in relation to Dr David 12 Kelly. 13 A. Mm-hm. 14 Q. Then at 277, you point out that the -- or one of the 15 reporters at the Times used Steve Whittamore. 16 A. Mm-hm. 17 Q. I think it's clear from the table which is on the second 18 of the two Information Commissioner's reports, "What 19 price privacy now?" 20 A. Mm-hm. 21 Q. Although the Times only features -- 22 A. Marginally. 23 Q. -- in those single figures. Can I ask you about 24 a specific question I'm invited to put to you. 277, 25 two-thirds this of the way down, you say: Page 118</p>	<p>1 doing. 2 MR JAY: Thank you. 3 LORD JUSTICE LEVESON: Thank you very much. 2 o'clock. 4 (1.01 pm) 5 (The luncheon adjournment) 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 Page 120</p>

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