

<p>1 2 (2.00 pm) 3 LORD JUSTICE LEVESON: Right. Well? 4 Closing submissions by MR MILLAR 5 MR MILLAR: Sir, I appear on behalf of the Telegraph Media 6 Group. 7 LORD JUSTICE LEVESON: Yes, after ten months, Mr Millar, 8 I've got that. 9 MR MILLAR: Thank you for the opportunity to address the 10 Inquiry and the time allocated to my client to do so. 11 We have, just for the record, put in full written 12 submissions. 13 LORD JUSTICE LEVESON: I have seen them, I have them in 14 front of me and I can assist you by saying I've read 15 them. They will, of course, be published. 16 MR MILLAR: I'm very grateful. 17 The aim of these submissions is not to, insofar as 18 that's possible, repeat what's in the written 19 submissions. I do, however, want to say a few words at 20 the outset about phone hacking and unlawful or unethical 21 journalistic practices generally. 22 LORD JUSTICE LEVESON: Mr Millar, I'd be very grateful for 23 that because I take the point you make about the 24 Telegraph's position, which you make very clearly in 25 your submissions, but of course I won't be addressing</p> <p style="text-align: center;">Page 1</p>	<p>1 The Telegraph was and remains appalled at the 2 revelations about phone hacking which led to this 3 Inquiry being established. Such activities are a very 4 long way removed from the responsible journalism in the 5 public interest which the Telegraph strives to provide 6 to its readers. And, as we've said at paragraph 21 in 7 our written submission, when something has gone wrong, 8 newspapers should own up and seek to put it right. 9 This has to happen in relation to phone hacking and 10 all other unlawful and unethical journalistic practices 11 identified by this Inquiry. 12 The evidence of Murdoch MacLennan, TMG's chief 13 executive, was that phone hacking was, and I quote, 14 "non-existent" at the Telegraph. He was able to say 15 this with confidence. First, when this Inquiry was set 16 up, TMG carried out a thorough internal review going 17 back to 2005 that found no evidence that any Telegraph 18 journalist has been involved in any hacking or indeed 19 any criminal conduct at all during this period. 20 Moreover, none of the Telegraph titles appear in the 21 so-called "league table" produced by the Information 22 Commissioner identifying newspapers which had sought 23 access to private data through the private investigator 24 Steve Whittamore. That, of course, goes back before 25 2005.</p> <p style="text-align: center;">Page 3</p>
<p>1 the Telegraph in terms, or indeed any of the titles in 2 terms, because I'm seeking to address the culture, 3 practice and ethics of the press or a section of the 4 press, and therefore the assistance I'm seeking from you 5 and from others, as I suggested this morning, is really 6 concerned with the conclusions I should reach about the 7 overall position. 8 MR MILLAR: Yes. 9 LORD JUSTICE LEVESON: And I appreciate that you can say, 10 "Well, we run our title, we don't run the other titles", 11 and I can only then ask you to have listened to all the 12 evidence I've heard and help me reach what conclusions 13 I should reach about culture, practice and ethics. 14 MR MILLAR: Yes, I will be endeavouring to do that. 15 LORD JUSTICE LEVESON: That's fine. 16 MR MILLAR: But it would be remiss of me not to say at least 17 a word at the outset about those matters. 18 Then I want to focus on, time being limited, 19 essentially three things. 20 First, as you've mentioned, sir, the culture, 21 practices and ethics of the press, the area you're asked 22 to explore into in part 1 of your Inquiry. Secondly, 23 the future of the press in the Internet age. And 24 thirdly, the future regulation of the press, as to which 25 you must now make your recommendations.</p> <p style="text-align: center;">Page 2</p>	<p>1 LORD JUSTICE LEVESON: You'll forgive me, Mr Millar, if 2 I accept of course what you've said and I understand 3 what Mr MacLennan said about the research that he'd 4 done, but just so that it's known, I would be surprised 5 if the Information Commissioner happened to alight upon 6 the only private detective in the country who was 7 working for media clients. I'm not for a moment 8 suggesting the Telegraph were involved in anything. 9 MR MILLAR: I understand. 10 LORD JUSTICE LEVESON: But you understand the point I'm 11 making. 12 MR MILLAR: I understand, but one can only work with the 13 evidence one has. 14 LORD JUSTICE LEVESON: Of course, I quite understand. 15 MR MILLAR: We believe that all of this is because of the 16 high professional standards the Telegraph insists upon 17 from its journalists. And -- and this is important -- 18 in the unlikely event that it were to find itself with, 19 if I can put it this way, one rogue reporter, the 20 Telegraph has strict financial and editorial governance 21 systems. These would quite simply make it impossible 22 for such a reporter to pay private investigators to 23 gather information illegally or to pay bribes. 24 You, sir, I know, appreciate that not all British 25 newspapers are open to the sorts of charges of</p> <p style="text-align: center;">Page 4</p>

<p>1 malpractice that led to this Inquiry being established. 2 The Telegraph is a prime example of one which is not. 3 But it is important also that the public and our 4 politicians understand that this is the case and that we 5 start from that understanding. 6 With those introductory comments, I turn to my and 7 your first heading: the culture, practices and ethics of 8 the press. 9 It's logical to consider first the historical issues 10 identified at subparagraphs 1(c) and 1(d) of your terms 11 of reference, namely the extent to which the current 12 regulatory framework has failed and the extent to which 13 there was a failure to act on previous warnings about 14 media misconduct. 15 As to the current regulatory framework, that is by 16 now, of course, well known. PressBoF, the Press Board 17 of Finance, raises funding from the industry to support 18 the system of self-regulation in its entirety. You've 19 heard evidence indicating that it's been very successful 20 in doing this in the years since its inception in 1990. 21 Over £30 million-worth of funding has been provided to 22 the Press Complaints Commission via PressBoF during this 23 period. It's funded the PCC in full against agreed 24 budgets. 25 This is not something to be sniffed at in times when Page 5</p>	<p>1 whether to grant relief which might affect the right to 2 freedom of expression. 3 The relevant provisions of the Editors' Code had 4 only recently been updated to comply with the 5 contemporary European Convention on Human Rights 6 standards, and Parliament did so. It enacted 7 section 12(4) with the privacy provisions of the Code in 8 mind, and that surely represents a valuable endorsement 9 of the Code. 10 It's easy to forget the numerous specific 11 achievements of the Editors' Code Committee. For 12 example, you, sir, I'm sure will recall, as many of us 13 who practised in the 1980s and 1990s will, that 14 witnesses at criminal trials were very often bought up 15 by certain newspapers. 16 This presented problems for the administration of 17 justice, in particular as to their credibility at trial. 18 The Editors' Code Committee introduced clear and tough 19 rules, now under paragraph 15, setting out the 20 limited -- extremely limited -- circumstances in which 21 such payments might justifiably be made. These rules 22 have been complied with and since then that particular 23 problem -- one of that age, if I can put it that way -- 24 has effectively disappeared. 25 Secondly, the rules on subterfuge were revised in Page 7</p>
<p>1 public funding for regulators is under serious pressure 2 as a result of the financial crisis. 3 The PCC deals with complaints but the rules applied 4 in doing so are written and updated by editors in the 5 Editors' Code Committee, a subcommittee of PressBoF. 6 TMG, as you know, is a strong supporter of the Editors' 7 Code. 8 Now the evidence on the topic has concluded, we 9 would suggest a number of key points need to be 10 remembered about the Code. 11 First and most importantly, the Code has received 12 widespread acceptance across the industry during its 13 time in existence. We would suggest that that is 14 precisely because it is drafted by editors who are 15 working in newspapers and magazines and who understand 16 how they operate. 17 Secondly, this process permits the Code to be 18 updated regularly to keep pace with developments, both 19 in society and in the industry, and indeed the 20 continuous flow of PCC adjudications. This can happen 21 without undue formality or delay under the current 22 system. 23 Thirdly, in 1998, Parliament enacted section 12(4) 24 of the Human Rights Act, requiring courts to take 25 account of any relevant privacy code when considering Page 6</p>	<p>1 2007 following the Goodman/Mulcaire convictions to cover 2 the activities of journalistic sources and agents, such 3 as private detectives. That's paragraph 10(2). And 4 successive updates of the Code, as I say, responding to 5 concerns about newspaper activities, have protected both 6 children and hospital patients when the subject of press 7 activity. 8 The predecessor of the PCC, the Press Council, had 9 not managed to introduce an editorial code at all, and 10 it's easy to lose sight of the effect that the Editors' 11 Code has had more generally since 1990 in changing 12 practices in the vast majority of newsrooms. Where an 13 issue arises that is covered by the Code, the relevant 14 provisions are considered and applied in most newsrooms. 15 It does not seem to us that any of the evidence you have 16 had would contradict that proposition. Certainly so at 17 the Telegraph, where, as Mr MacLennan told you, the 18 journalists live by the Code. 19 It's important to remember that this process has 20 raised standards considerably across this period from 21 1990 to date. What it's done is to enable occasions of 22 malpractice to be identified and characterised as being, 23 quote, "in breach of the Code", and that in turn has 24 created a culture in which, in the vast majority of 25 cases, ethical breaches are noted, responded to swiftly Page 8</p>

<p>1 and rectified effectively and prominently by the 2 newspaper concerned.</p> <p>3 PressBoF also guarantees the existence and 4 development of the Press Complaints Commission.</p> <p>5 The latter point, continuous development of the 6 bodies within the regulatory framework as well as the 7 rules, is an important aspect of a system created by the 8 industry and independent of statute.</p> <p>9 It can keep recreating itself under its own 10 arrangements. Thus, during the same period, PressBoF 11 has, for example, extended the remit of the PCC beyond 12 print news publication to cover online newspapers and 13 magazines. It has introduced public appointments 14 procedures for membership. It's strengthened the lay 15 majority on the Press Complaints Commission. It's 16 introduced public consultation into the annual reviews 17 of the Editors' Code, and in 2007 extended the PCC's 18 remit to cover editorial audiovisual content that now 19 appears on newspaper and magazine websites.</p> <p>20 It has been said that the evolution of the PCC has 21 not been quick enough or far-reaching enough, and with 22 hindsight the Telegraph would not disagree with that. 23 The point we make here is simply that this sort of 24 evolution can happen efficiently and organically under 25 a system established and accepted by the industry.</p> <p style="text-align: center;">Page 9</p>	<p>1 healthy relationship with the PCC. As he put it: 2 "They can pick up the phone and they can send an 3 email to me, and they're very quick to point out where 4 there's an issue with a particular person that is 5 requiring or demanding privacy".</p> <p>6 So that aspect of the PCC's activity is not to be 7 underestimated or undervalued. But throughout this 8 hearing Telegraph witnesses have acknowledged the 9 shortcomings of the PCC.</p> <p>10 First, it operates more as a mediator of particular 11 disputes. Mr Gallagher's predecessor, Will Lewis, had 12 earlier in the same session memorably said, 13 "I understand the PCC up until this point to have been 14 a mediator with a regulatory reputation". And he 15 concurred with the emerging consensus for a more 16 independent, genuinely self-regulatory system.</p> <p>17 Mr Lewis's characterisation may be a good one and it 18 might have come to be thought of as an industry 19 regulator, for want of a better word, actually to 20 describe its more limited role.</p> <p>21 Second, and in consequence of the first point -- 22 LORD JUSTICE LEVESON: It also described itself as 23 "a regulator".</p> <p>24 MR MILLAR: Maybe for the same reason. But it is 25 acknowledged, I think by common consent now, the</p> <p style="text-align: center;">Page 11</p>
<p>1 LORD JUSTICE LEVESON: But it only identifies occasions of 2 malpractice and characterises them as being "in breach 3 of the Code" if there is a complaint made by somebody 4 who falls within the comparatively limited definition of 5 those who can complain.</p> <p>6 MR MILLAR: Yes. I'm coming to that.</p> <p>7 LORD JUSTICE LEVESON: Right.</p> <p>8 MR MILLAR: There are other points to be made about the PCC. 9 There are failings and shortfalls. I'm going to 10 identify and accept them. That's part of the process of 11 analysis by which you get to the case we're putting 12 forward on regulation.</p> <p>13 LORD JUSTICE LEVESON: That's a very polite way, Mr Millar, 14 of saying, "Just listen and stop interrupting me", and 15 I shall.</p> <p>16 MR MILLAR: The PCC has -- and this is really the point, 17 sir, you've just made -- we would say, for the most part 18 proved effective in dealing with single complaints from 19 the public within its terms of reference; doing so 20 swiftly and without cost.</p> <p>21 It can be very effective in intervening or mediating 22 or heading off a problem presented by a particular 23 story.</p> <p>24 Mr Gallagher, for example, the editor of the Daily 25 Telegraph, said he has what he described as a very</p> <p style="text-align: center;">Page 10</p>	<p>1 evidence has concluded at this Inquiry, that in the 2 strict use of that term it is certainly not a regulator, 3 and has not had available to it regulatory powers in the 4 true sense.</p> <p>5 It lacks the powers to deal with systemic ethical or 6 governance failures; in particular newspapers as opposed 7 to one-off complaints. That is clear from the evidence 8 that you've heard at this Inquiry. As Lord Black 9 acknowledged in his evidence, this means that there are 10 some instances of non-compliance with the code -- big 11 instances -- which are simply beyond the PCC's control 12 or outside of its remit. When one of these, like phone 13 hacking, comes up, the reputation of the PCC is 14 severely, and it would appear in the case of phone 15 hacking, fatally damaged.</p> <p>16 Thirdly, there is a perceived lack of independence 17 because of the direct relationship between PressBoF and 18 the PCC, the adjudicatory body.</p> <p>19 Fourthly, there is the problem of the reluctant 20 publisher. Lord Black also acknowledged that operating 21 a voluntary system makes it difficult to deal with the 22 occasional rogue publisher who wants to pick and choose 23 when its in or out of the complaints system.</p> <p>24 LORD JUSTICE LEVESON: You need to be careful about the 25 description "rogue", because there may be very good</p> <p style="text-align: center;">Page 12</p>

3 (Pages 9 to 12)

<p>1 reasons why that particular publisher doesn't want to be 2 within the system, which may itself reveal systemic 3 problems. 4 So, for example -- if I don't take the obvious one 5 but if I take the example of Mr Hislop -- Mr Hislop made 6 it abundantly clear that there was absolutely no reason 7 whatsoever why he should participate in the PCC because 8 his periodical, every week, week in, week out, laid bare 9 criticisms of all those papers whose editors were 10 represented on the PCC. So that is a systemic issue, 11 quite apart from what might be other issues. Isn't it? 12 MR MILLAR: Yes. I ought to say, I was using the word 13 "rogue" because it was the word that Lord Black had used 14 in his evidence. 15 LORD JUSTICE LEVESON: Yes. 16 MR MILLAR: And I was summarising his evidence. 17 We take that point, but the ideal is to have as many 18 signed up as possible. Indeed, the ideal is to have 19 everybody signed up. 20 LORD JUSTICE LEVESON: Absolutely no question about that. 21 MR MILLAR: And Private Eye is, with all due respect, a very 22 unusual publication in the firmament of British 23 publications. There aren't any other examples -- 24 LORD JUSTICE LEVESON: There are other examples. You could 25 then take -- now inevitably I'll take Northern & Shell.</p> <p style="text-align: center;">Page 13</p>	<p>1 light of everything I've just said, the correct answer 2 to this question is that the industry system in 3 existence hitherto has been unable or ill-equipped to 4 act effectively when facing serious examples of 5 non-compliance. 6 But it would be wrong, just for the record, to 7 suggest that there has been a complete failure by the 8 industry to act in the face of warning signs. 9 To take the trade in data and phone hacking as the 10 most immediate examples, as Lord Black explained in his 11 first statement, the industry did respond to warning 12 signs in these areas. As I've already mentioned, in 13 2007, following the Goodman/Mulcaire convictions, the 14 subterfuge rules in the Editors' Code were amended to 15 cover hacking, and to make clear that exactly the same 16 ethical rules applied to acts of private investigators 17 on behalf of newspapers. 18 The industry, through PressBoF, also worked with the 19 PCC to implement the six recommendations contained in 20 its now much criticised 2007 report on phone hacking in 21 the wake of the conviction of Goodman and Mulcaire. 22 You've heard evidence about those and they would have 23 been, if implemented, rules which would have prevented 24 future misuse of cash to pay contributors to act 25 illegally. So they were the right rules at the right</p> <p style="text-align: center;">Page 15</p>
<p>1 You didn't have to have the insight of a great thinker 2 to appreciate that Mr Desmond has views about some of 3 the editors who he sees are really running the PCC, and 4 equally you don't have to be very perceptive to realise 5 that they have views about him. That's all fair enough. 6 Everybody's entitled to think what they wish about their 7 competitors. But the thing that a regulator has to be 8 is to be independent of all of that, doesn't it? 9 MR MILLAR: Yes. The point is well made and it's taken, and 10 I'll say "stray" rather than "rogue". 11 LORD JUSTICE LEVESON: I'm not criticising you or 12 Lord Black. 13 MR MILLAR: The aim must also be to have a consensual 14 regulatory system that doesn't give rise to 15 a publisher -- and certainly not a major publisher -- 16 expressing concerns such as those as the basis for not 17 participating in the system. That must be the aim. And 18 I think that is well recognised now as a result of all 19 the water that's flowed under the bridge at this 20 Inquiry. 21 So, as you will gather from the recent remark that 22 I've made, the Telegraph accepts the case for replacing 23 the PCC with something better. 24 As to 1(d), the extent to which there was a failure 25 to act to previous warnings about media misconduct, in</p> <p style="text-align: center;">Page 14</p>	<p>1 time. 2 Then following the publication by the Information 3 Commissioner of "What price privacy?", PressBoF 4 co-ordinated through the industry associations an 5 information campaign to emphasise to all journalists the 6 importance of respecting the legislation on data 7 protection, and the Inquiry has a copy of the relevant 8 guidance note. 9 So, as I say, the problem was not no response. It 10 was that the response was unsuccessful, in part because 11 of the limited powers of the PCC, its inability to go 12 beyond taking steps such as the ones that I've just 13 listed. 14 As far as individual publishers are concerned, I can 15 only speak for my client, the Telegraph. 16 At this level there's always been a notable 17 commitment to action when warning signs appeared. For 18 example, as you've heard, TMG led the industry's 19 response to "What price privacy?" that I've just 20 mentioned. And although it had not been criticised by 21 the Information Commissioner in 2008, it updated its own 22 expenses policy to make clear that all payments to 23 sources or intermediaries had to be made through the 24 company's contributor system, requiring audited BACS 25 transfers and editorial scrutiny.</p> <p style="text-align: center;">Page 16</p>

<p>1 Although none of its journalists had hacked phones, 2 events at the News of the World prompted Mr MacLennan to 3 issue a consolidated code of conduct to all editorial 4 staff, with a covering letter reminding them of their 5 obligation to maintain the very highest standards in 6 their work.</p> <p>7 So what is the Inquiry to say about the culture, 8 practices and ethics of the British press, about which 9 it's heard so much evidence, some relating to phone 10 hacking, but going a long way beyond that single unhappy 11 topic?</p> <p>12 I look at culture, first. I suppose the first 13 question is: what are you being asked about here? One 14 has to define one's terms. Here it seems to us that 15 you're being asked about essentially shared mental 16 assumptions within each organisation, the assumptions 17 that guide both interpretation -- interpretation of the 18 Editors' Code -- and action by defining what is or is 19 not appropriate behaviour for a variety of situations. 20 Different situations.</p> <p>21 The problem, of course, is that in a large industry 22 such as the British press, diverse and sometimes 23 conflicting cultures are liable to co-exist due to 24 different characteristics of the particular editorial 25 and management teams at the particular newspaper.</p> <p style="text-align: center;">Page 17</p>	<p>1 example, about what readers want to read, how much 2 privacy celebrities should have given that they are 3 celebrities and they put aspects of their life into the 4 public domain, how much fact-checking is required for 5 a story and crucially, what or what is not defensible as 6 being in the public interest?</p> <p>7 I'm just picking some examples there from the 8 evidence that you've heard. It must be clear to you 9 from the evidence that all of that is the case. It 10 seems to us to be the case, and we say that you should 11 recognise that in your report and make findings in 12 recognition of that fact.</p> <p>13 LORD JUSTICE LEVESON: That's where there is the distinction 14 between what might be described as the "broadsheet 15 papers" and what might be described as the "tabloid" and 16 "mid-market papers", and if you are saying to me that 17 I must recognise that there is a range of legitimate 18 responses by each type of paper, then I think that's 19 right.</p> <p>20 There isn't a bright line in relation to particular 21 stories, on one side of which nothing is permissible and 22 the other side of which anything is permissible. And 23 that line, that width, which is a grey area, is going to 24 move. The question is whether the process should be 25 different, albeit that the result, for different</p> <p style="text-align: center;">Page 19</p>
<p>1 Certainly different newspapers -- we know this 2 much -- behave differently in the same situation. Some 3 may feel that the public interest justifies running 4 a particular story or photograph or investigating in 5 a particular way, where others may not.</p> <p>6 Is this because they're guided by different shared 7 assumptions about how newspapers should act and what 8 they should publish, particularly where their action 9 impacts on the rights or sensibilities of others?</p> <p>10 We would say that the answer to this question, on 11 the evidence you've heard, is yes. That is not to say 12 that one can always or easily identify a right or 13 a wrong way of acting as a newspaper in a particular 14 situation.</p> <p>15 At the extremes, you clearly can. As we said, 16 no one in their right mind could try to defend the 17 hacking of Milly Dowler's phone by journalists. On the 18 other hand, no journalist would say you should not 19 publish a story about a Cabinet Minister accepting 20 corrupt payments because his or her financial affairs 21 are private.</p> <p>22 But where the judgment calls have been made in the 23 vast middle ground between those two types of extreme 24 example, it seems to us clear that different newsrooms 25 operate on different shared mental assumptions; for</p> <p style="text-align: center;">Page 18</p>	<p>1 reasons, might not be the same. Do you follow the point 2 I'm seeking to make?</p> <p>3 MR MILLAR: I do. I think it's a little bit ahead of the 4 point I've got to.</p> <p>5 LORD JUSTICE LEVESON: See, I didn't shut up. All right.</p> <p>6 MR MILLAR: I will come to that. I was just trying to 7 tackle this question of culture, because there's a lot 8 in that word, and one has to ask oneself -- or, rather, 9 sir, you have to ask yourself: "What am I being asked to 10 think about and decide there?"</p> <p>11 It seems to us from the evidence that it is this 12 differing set of shared assumptions that management 13 teams in different newspapers have about a whom range of 14 subjects. What their readers want to read is often put 15 forward as the starting point. Certainly it is in the 16 case of the Telegraph, which is very attuned to its 17 readership and what they want to read, but equally we've 18 heard evidence from an editor of the Sun who said 19 exactly the same thing. The content of the perception 20 is different, and that may affect the culture.</p> <p>21 All I'm doing at this stage is recognising that that 22 is what the evidence at the Inquiry shows us quite 23 clearly. And it is a useful starting point for 24 analysing the rest of the issues you have to look at in 25 one.</p> <p style="text-align: center;">Page 20</p>

<p>1 A distinction between the broadsheets, mid-market 2 and tabloids can be a little crude. It's not for us to 3 suggest that there aren't perfectly good shared mental 4 assumptions in tabloid newspapers; they're just 5 different. That's the point. 6 LORD JUSTICE LEVESON: I think that's what I just tried to 7 say. 8 MR MILLAR: Well, I agree then. 9 But we certainly don't want to be taken to be 10 suggesting that this is in some way critical of other 11 forms of journalism to that which the Telegraph is known 12 for. 13 LORD JUSTICE LEVESON: The problem -- 14 MR MILLAR: It's just the reality of a complex, diverse 15 industry. 16 LORD JUSTICE LEVESON: The problems of the word "culture" go 17 slightly beyond that. It would be impossible to say 18 that it was a culture within the medical profession that 19 doctors behaved as Dr Shipman behaved, yet there was 20 still an absolute requirement to review the regulatory 21 mechanisms to make sure that every step was taken to 22 deal with a problem such as that which Dr Shipman 23 generated. 24 MR MILLAR: Sure. 25 LORD JUSTICE LEVESON: It strikes me that culture,</p> <p style="text-align: center;">Page 21</p>	<p>1 badly. 2 I am saying that when an episode like phone hacking 3 occurs, you can say it's the consequence of the culture 4 in that newsroom in the sense that I've described it, 5 because the shared set of assumptions about all these 6 complex things allow it to happen. I'm not running away 7 from that conclusion. What I didn't want to do was what 8 each newspaper must do itself, which is to explain the 9 particular cocktail of mental assumptions and attitudes 10 to how journalism should be done that operate within its 11 newsroom, because that's for others to do. 12 One further caveat to this is important. The 13 culture in an organisation can be changed. This may be 14 because the management team changes or because the 15 existing team changes its approach, including as to the 16 governance arrangements within the organisation. 17 We heard with interest, sir, your exchanges with 18 Deputy Assistant Commissioner Akers this morning 19 regarding the role of the MSC in the management of 20 affairs at News International. That may be a good 21 example of how such changes can be brought about: a big 22 structural change as the beginning of the process of 23 changing the culture. 24 This point is clearly very important because to the 25 extent that there are cultural problems in any industry</p> <p style="text-align: center;">Page 23</p>
<p>1 therefore, must be more than a single example. It must 2 be more than a single title, if you like. It has to be 3 something that is perhaps a consequence of the way in 4 which the job has to be done or can be done, depending 5 upon what your aims and aspirations for your paper are. 6 MR MILLAR: Yes. 7 LORD JUSTICE LEVESON: But neither need it be universal. 8 MR MILLAR: Yes. Well, look, it's not for me to address 9 a set of shared mental attitudes, as I've characterised 10 them, at any other newspaper other than the Telegraph. 11 But taking the Telegraph as an example, we can see -- 12 and I'll deal with this in a moment -- that the 13 practices within the newspaper are the product of a set 14 of shared mental assumptions in management and senior 15 editorial posts about how journalism should be done. 16 LORD JUSTICE LEVESON: I will stop interrupting, but I just 17 want to pick you up on what you've just said, because 18 I don't agree with the assertion that it's not for you 19 to address the shared mental culture. 20 That's exactly what I have to do. I have to look at 21 the culture, practices and ethics of the press, and the 22 assistance that I would like from you, and indeed from 23 all those who are to speak, is very much their 24 perception of what the evidence reveals -- 25 MR MILLAR: I understand that, sir. Maybe I put the point</p> <p style="text-align: center;">Page 22</p>	<p>1 or part of an industry, it can't be assumed that 2 regulation, particularly, we would say, regulatory 3 arrangements instigated by the government, will 4 necessarily change those. One only has to look at the 5 banking industry to see that that is the case, or, dare 6 I say it, the House of Commons, albeit the members of 7 the House have always had rather fewer rules to work 8 under than the banking industry, especially prior to the 9 expenses scandal. 10 Sometimes the culture is changed by the public 11 revelation of a scandal, or succession of scandals, so 12 big, and to which there is such a powerful reaction, 13 that there is no alternative but to change. This has 14 proved true of the MPs' expenses scandal in relation to 15 the claiming of allowances by our Parliamentarians, and 16 it may yet prove to be true of the banking crash, 17 particularly as matters such as the LIBOR fixing scandal 18 emerge into the public domain. 19 Sometimes the intervention of the law, especially 20 the criminal law, alongside the public revelations and 21 outrage can also shock or even frighten people into 22 changing, but peer or industry pressure to change and 23 pressure from advertisers and the public, public 24 opinion, is likely to play a big role in this situation, 25 bigger, we would suggest, than what's written down in</p> <p style="text-align: center;">Page 24</p>

<p>1 rules required by Parliament.</p> <p>2 The Inquiry must bear this in mind, if you accept</p> <p>3 our submission on this point, because we say it's likely</p> <p>4 to be true of the phone hacking scandal and the</p> <p>5 subsequent allegations of other different types of</p> <p>6 journalistic malpractice that have been made since last</p> <p>7 summer.</p> <p>8 There has been a massive public response, expression</p> <p>9 of outrage, and the industry is under enormous pressure,</p> <p>10 where there are problems in the culture, to change those</p> <p>11 in response to that.</p> <p>12 LORD JUSTICE LEVESON: One might have said the same at</p> <p>13 earlier times in the history of press investigations.</p> <p>14 MR MILLAR: Well, I was going to say next that repeated</p> <p>15 reference has been made at this Inquiry to the setting</p> <p>16 up of the Calcutt Committee in 1989, but it has to be</p> <p>17 remembered that the then Prime Minister, Margaret</p> <p>18 Thatcher, set up the Calcutt Committee because of</p> <p>19 progressive loss of confidence in the Press Council in</p> <p>20 the 1980s, which was felt not to have the powers and not</p> <p>21 to be doing the job.</p> <p>22 LORD JUSTICE LEVESON: If you read some the evidence that</p> <p>23 I've seen about that, it was felt that the press</p> <p>24 themselves undermined the work of the Press Council.</p> <p>25 MR MILLAR: Yes.</p> <p style="text-align: center;">Page 25</p>	<p>1 scandal of the scale of phone hacking that prompted</p> <p>2 almost overnight the setting up of the Inquiry.</p> <p>3 So, with respect, the background is qualitatively</p> <p>4 different here.</p> <p>5 As far as practices is concerned, we would say the</p> <p>6 position is the same in relation to practices; the next</p> <p>7 thing you're asked to look at.</p> <p>8 The practices of an organisation tend to be</p> <p>9 determined by the aims of the leadership. And it's</p> <p>10 apparent from the account I've given of the Telegraph's</p> <p>11 internal systems that that can be to the benefit of the</p> <p>12 organisation as far as practices are concerned. Thus</p> <p>13 the clear aim of management has been to avoid cash</p> <p>14 payments to private investigators and the like, so it's</p> <p>15 made clear to all editorial staff this is an</p> <p>16 unacceptable practice and arrangements are put in place</p> <p>17 to prevent it and effectively make it impossible. Thus</p> <p>18 management aims affect practice.</p> <p>19 Again, the evidence you have heard, we accept, shows</p> <p>20 that permitted practices can differ from newspaper to</p> <p>21 newspaper, as with culture.</p> <p>22 As far as ethics is concerned, there is, of course,</p> <p>23 there is of course a single set of ethical rules in the</p> <p>24 form of the Editors' Code, but TMG accepts, as suggested</p> <p>25 by the evidence received at this Inquiry, that the</p> <p style="text-align: center;">Page 27</p>
<p>1 LORD JUSTICE LEVESON: And they didn't like the Press</p> <p>2 Council so what they went about doing -- this is some of</p> <p>3 the material that I've seen -- is rubbishing it</p> <p>4 publicly, and therefore the public lost all confidence</p> <p>5 in it.</p> <p>6 MR MILLAR: Yes, but that happened over a period.</p> <p>7 LORD JUSTICE LEVESON: Certainly.</p> <p>8 MR MILLAR: And during that decade, there were certainly</p> <p>9 many examples of unethical journalism; chequebook</p> <p>10 journalism, the example I gave earlier: buying up</p> <p>11 witnesses being one of the big examples, and other</p> <p>12 intrusions into privacy.</p> <p>13 LORD JUSTICE LEVESON: Yes, that didn't stop then, because</p> <p>14 the biggest outrage about buying up witnesses occurred</p> <p>15 in 1995 during the prosecution of Rosemary West and</p> <p>16 those witnesses, the Cromwell Street murders.</p> <p>17 MR MILLAR: Yes.</p> <p>18 LORD JUSTICE LEVESON: I don't need to be reminded of any of</p> <p>19 that; it's seared on my conscience.</p> <p>20 MR MILLAR: There were some other big examples. The</p> <p>21 Yorkshire Ripper case, as well, where there were many</p> <p>22 documented cases of attempts to buy up witnesses.</p> <p>23 But the point I'm making is that those examples and</p> <p>24 those concerns about intrusions into privacy were</p> <p>25 building up over a period. It wasn't a single one-off</p> <p style="text-align: center;">Page 26</p>	<p>1 provisions of the code are simply not operated and</p> <p>2 applied uniformly across the industry.</p> <p>3 The Inquiry is by now familiar with the rules which</p> <p>4 tend to be applied differently by different newspapers:</p> <p>5 rules as to privacy, harassment, intrusion into grief,</p> <p>6 use of subterfuge in particular.</p> <p>7 To sum up, clearly the Inquiry can say that there</p> <p>8 have been high profile examples of the Code not being</p> <p>9 applied by one or more newspapers, phone hacking being</p> <p>10 the most glaring example; but equally it has to say</p> <p>11 there are many, many other newspapers, such as the</p> <p>12 Telegraph titles, where the journalistic culture and</p> <p>13 practices are exemplary and the publisher strives for</p> <p>14 the highest possible ethical standards.</p> <p>15 The next question is, having reached this point in</p> <p>16 my analysis: what of the future?</p> <p>17 I make my comments about the future of the press in</p> <p>18 the Internet age before those relating to future</p> <p>19 regulation, because we would suggest that no discussion</p> <p>20 of the latter should take place without an understanding</p> <p>21 of the former.</p> <p>22 Changing attitudes to news consumption, and in</p> <p>23 particular the arrival of the Internet as a mass medium</p> <p>24 for the dissemination of news and entertainment, means</p> <p>25 that the future of the newspaper industry is highly</p> <p style="text-align: center;">Page 28</p>

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<p>1 uncertain at the point at which you produce your report. 2 People consume less and less news off the printed page. 3 It's startling, sir, to recall now that when the 4 first General Press Council was formed in 1953, 5 following the 1949 Royal Commission, 21 million 6 newspapers were sold in Britain each weekday, and 31 7 million on a Sunday. The weekday figure now, I believe, 8 is just over 9 million and falling. 9 Newspapers now have to compete not just with radio 10 and television news, but also with an ever-growing 11 supply of news and entertainment content in different 12 forms on the Internet. 13 As with many social trends, it's instructive to look 14 at the United States on the basis that what happens 15 there, happens here eventually, and eventually to much 16 the same extent. The most recent work in this area in 17 America has been done by the Pew Project for Excellence 18 in Journalism. It's a non-profit research project in 19 Washington, a fact tank, specialising in the impact of 20 the Internet on society, and one strand of it is the 21 Project for Excellence in Journalism. 22 The State of the Media survey by Pew in 2011 23 revealed 46 per cent of those polled saying they read 24 their news online at least three times a week, passing 25 newspapers at 40 per cent for the first time.</p> <p style="text-align: center;">Page 29</p>	<p>1 The same is true of quality journalism. If they're 2 not prepared to pay for it in a fragmented market, as a 3 particular thing they buy in an app, part of the output 4 of a newspaper, the industry is in a very difficult 5 situation as far as that sort of content is concerned. 6 And I think that's widely recognised. 7 LORD JUSTICE LEVESON: Yes. It's a much, much bigger 8 problem than having to cope with the problems of 9 regulation, whatever form regulation might ultimately 10 be. 11 MR MILLAR: Let's just say it's another problem that the 12 industry faces. 13 Reduced newspaper sales mean lost circulation 14 revenues and lower advertising revenues. The 2011 Pew 15 survey revealed that in 2010, both digital news 16 readership and advertising revenue from digital streams 17 in the US surpassed that of newspapers for the first 18 time. 19 So far as advertising revenues are concerned, this 20 is so not because there have been large increases in 21 digital advertising revenue, but rather because the loss 22 of print advertising revenue has been so dramatic. 23 The most recent Pew survey in March of this year 24 looked in detail at 38 American newspapers, of necessity 25 regional or local, because that's the way the press</p> <p style="text-align: center;">Page 31</p>
<p>1 In a separate investigation by Pew, 47 per cent of 2 those polled said they get some news from mobile devices 3 such as cell phones, e-readers and tablets each week. 4 Pew reports that this trend is increasing rapidly. This 5 is important because three-quarters of those polled in 6 this part of the poll said they would not be prepared to 7 pay anything for news received via apps. Yet I'm 8 instructed, and I think you've been told in evidence, 9 that each additional form or format in which the 10 newspaper has to curate and then disseminate and publish 11 information, increases the overheads of the newspaper. 12 So there are two different graphs going in two 13 different directions there at the moment. 14 LORD JUSTICE LEVESON: I don't understand how people can 15 expect to receive well-researched investigative 16 journalism, which gives the public information so that 17 the public can hold power to account, and not pay for 18 it. I don't see how that's an equation that can ever 19 ultimately work. 20 MR MILLAR: You're right about that. We share that concern. 21 But the logical conclusion of that analysis may be that 22 investigative journalism shrinks to a vanishing point 23 unless it can find streams of income to fund it and 24 people are prepared to fund it to enable it to happen; 25 but people aren't prepared to pay for it.</p> <p style="text-align: center;">Page 30</p>	<p>1 operates there. This showed that for every \$7 lost in 2 newspaper advertising revenue, the newspapers in the 3 survey were picking up only an additional \$1 in digital 4 advertising revenues. I'm instructed by my client that 5 a similar displacement ratio has occurred with many 6 British newspapers. Online advertising rates are more 7 competitive and are simply much lower. 8 This factor is particularly important for the sort 9 of local and regional papers that Pew was surveying, and 10 is for our local and regional papers. 11 Lastly, of course, there's no equivalent to the 12 newspaper's cover price with the Internet. The fact 13 that news is free on the rest of the Internet means it's 14 difficult to run a newspaper website on a subscription 15 basis. 16 The Internet has also changed patterns of news 17 consumption. The Internet is dramatically altering 18 these, in three ways in particular. First, the reach of 19 existing news organisations is being widened. Their 20 reporting is accessible to a global audience. So online 21 newspapers such as the Telegraph are competing in a much 22 bigger global market. 23 Secondly, more and more readers are accessing their 24 news through online-only news providers, such as the 25 Huffington Post. Some of these operate largely as low</p> <p style="text-align: center;">Page 32</p>

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<p>1 overhead aggregators of other Internet news content, 2 usually content gathered at the considerable expense of 3 a newspaper such as my client, the Telegraph. 4 We don't get the browser, the person doing the 5 browsing, making it harder to keep advertising revenues 6 up, but the browser gets the fruit of our news gathering 7 and our journalism. 8 Thirdly, there is this thing called "crowd-sourced 9 news", which is a phrase I hadn't heard before I started 10 looking at this over the weekend. This is the phrase 11 for something you have heard evidence about, which is 12 news content from a variety of Internet news sources 13 being aggregated and pushed at online readers via large 14 social media platforms like Google, Google News and 15 Yahoo News, and portals like MSN. This has precisely 16 the same disadvantage from our point of view as the 17 other aggregators like Huffington. 18 So the upshot is that a paper like TMG now has to 19 compete with other newspaper sites, online-only sites, 20 big broadcast sites such as that of the BBC and news 21 agency sites such as Reuters. 22 We're not suggesting there are not some winners 23 amongst the losers. The statistical evidence shows that 24 different newspapers are faring very differently in the 25 transition to digital. There can be success stories, Page 33</p>	<p>1 dispute, or the issue, about what form future regulation 2 should take. We don't want to repeat those or all of 3 the points made by PressBoF and the two Lords, 4 Lord Black and Lord Hunt, in their evidence in Module 4. 5 These address in detail how the proposed system put 6 forward by PressBoF remedies the failings of the PCC 7 that I identified earlier on in these submissions, and 8 we gratefully adopt those points. 9 But TMG does want to emphasise the following points, 10 as it were from its own particular perspective. 11 The Telegraph does not want to be subject to a form 12 of regulation which it opposed in principle -- that is 13 regulation following statutory intervention -- when it 14 does not require to be regulated in this way because it 15 has achieved high standards under the current system. 16 The same point can be made, no doubt, by many other 17 newspaper publishers. 18 TMG is also deeply concerned about the uncertain 19 future that it and other newspapers face. As I've said, 20 even profitable newspapers, such as those operated by 21 TMG, may find it harder and harder to be profitable as 22 more readers get their news through the Internet. 23 The proposal put forward by PressBoF is known in its 24 essentials and understood. It may not be perfect, but 25 it does not add to those concerns. It's a work in Page 35</p>
<p>1 and TMG's evidence shows it to be one of these, 2 a profitable newspaper in a difficult time. 3 To achieve this, the Telegraph has had to focus 4 intensely on delivering to its readers and its 5 commercial partners the service they want. It has also 6 had to invest heavily in technology and digital 7 operations, so that it can complete on even terms with 8 all these other online news providers. 9 It now produces immediate high quality content 10 available to the world at large on an attractive and 11 accessible website and in other digital forms, but, as 12 I have said, at a considerable cost. And the future, 13 even for a successful operation like the Telegraph, is 14 necessarily highly uncertain. And I don't mean the 15 long-term future. We're talking years not decades here. 16 So against that slightly depressing background, 17 I turn to regulation. 18 A great deal of evidence has been given about the 19 future of press regulation. There's also much argument 20 in the written closing submissions. The Inquiry is 21 aware that TMG supports the proposal put forward by its 22 own director, Lord Black, in his capacity as chairman of 23 PressBoF in Module 4. 24 We've set out in our written closing submissions at 25 paragraphs 112 to 118 the basic points we make about the Page 34</p>	<p>1 progress and will doubtless be refined and improved. 2 By contrast, we've not seen any proposals formulated 3 by the Inquiry or by Parliament itself, and that is 4 inevitably and necessarily a matter of concern for us. 5 LORD JUSTICE LEVESON: Well, hang on. What would you expect 6 me to do? If I'd started formulating proposals, then 7 I would have been criticised roundly for pre-judging 8 issues which I have to decide. What I have received is 9 a dozen sets of proposals, which I have to analyse. 10 MR MILLAR: It wasn't intended, sir, as a criticism of you. 11 It is simply a statement of fact, so that you understand 12 our position and you think of things from our position. 13 We have on the one hand a set of proposals put 14 forward by PressBoF which have been subject to detailed 15 scrutiny in this Inquiry, which we support. There is 16 nothing in the domain of the Inquiry, promulgated by the 17 Inquiry or by Parliament, saying what form regulation 18 following statutory intervention would take and how the 19 structure would operate. 20 LORD JUSTICE LEVESON: But you could analyse each of the 21 other submissions that I have received and subject them 22 to the same critical analysis that the suggestions put 23 forward by PressBoF have been subjected to. 24 MR MILLAR: Of course we could, but -- 25 LORD JUSTICE LEVESON: And then you'll be able to say, "This Page 36</p>

<p>1 works", or, "This doesn't work".</p> <p>2 MR MILLAR: But they're not going to make the recommendation</p> <p>3 and they're certainly not going to make the law. And</p> <p>4 what newspapers such as the Telegraph are asking</p> <p>5 themselves is: if there is to be a recommendation or</p> <p>6 a proposal for statutory underpinning, as it's been</p> <p>7 described in this Inquiry, what will that actually</p> <p>8 involve? How much statutory input will there be into</p> <p>9 the terms under which the ethical code gets formulated,</p> <p>10 the way in which the body gets constituted, the</p> <p>11 sanctions that are to be operated, the sanctions that</p> <p>12 are to be operated if you don't join the organisation?</p> <p>13 Nothing on that.</p> <p>14 LORD JUSTICE LEVESON: Well, you could start by looking at</p> <p>15 the principles enunciated in Ireland, which merely</p> <p>16 identify what a regulator ought to look like, but</p> <p>17 doesn't either set up a regulator or indeed define its</p> <p>18 precise remit.</p> <p>19 MR MILLAR: But the point I'm making is: how do we know that</p> <p>20 that is what is on offer here? That's what has to</p> <p>21 happen. We don't, do we?</p> <p>22 LORD JUSTICE LEVESON: Of course we don't, because I don't</p> <p>23 know as yet. I'm waiting to hear everything, then</p> <p>24 I will make a recommendation, which then the Government</p> <p>25 will either accept or reject, which the press will</p> <p style="text-align: center;">Page 37</p>	<p>1 replicated Ofcom. I would be very surprised if</p> <p>2 I reached that conclusion.</p> <p>3 MR MILLAR: We're glad to hear that, but the point I'm</p> <p>4 making -- and I think you understand it and accept it --</p> <p>5 is that there are very many possible models for</p> <p>6 statutory intervention in regulation of differing</p> <p>7 degrees, with a different amount of statutory regulation</p> <p>8 of, or definition of, bodies, rules, sanctions. And we</p> <p>9 just have no idea what it might look like, if we face</p> <p>10 it.</p> <p>11 LORD JUSTICE LEVESON: I agree, which is why the help would</p> <p>12 be: what are the principles which I should be following</p> <p>13 when seeking to devise a recommendation? And: what are</p> <p>14 the red lines that would cause greater concern? What</p> <p>15 are the slightly fuzzier lines where there is more room</p> <p>16 for discussion?</p> <p>17 That's what I thought was the debate that was</p> <p>18 started by what Mr Dacre said as long ago as</p> <p>19 last September, I think, when he recognised the need for</p> <p>20 a different mechanism and he made some suggestions, some</p> <p>21 of which I think he's stepped back from. Well, he's</p> <p>22 perfectly entitled to that view. But I'm trying to</p> <p>23 understand what are the principled objections.</p> <p>24 I can understand you saying, "I recognise what the</p> <p>25 PressBoF people are suggesting because I can see it.</p> <p style="text-align: center;">Page 39</p>
<p>1 either accept or reject.</p> <p>2 MR MILLAR: No, but it's obvious there could be more or less</p> <p>3 statute involved. There could be more or less statute</p> <p>4 involved in each of the areas that I've described.</p> <p>5 Mandatory rules. Things that have to be achieved.</p> <p>6 LORD JUSTICE LEVESON: Well, I understand, and the real</p> <p>7 question is --</p> <p>8 MR MILLAR: But we don't --</p> <p>9 LORD JUSTICE LEVESON: -- how close to the wall can you</p> <p>10 throw the penny?</p> <p>11 MR MILLAR: Yes.</p> <p>12 LORD JUSTICE LEVESON: To get a system that will work and</p> <p>13 that will satisfy the public concern about what the</p> <p>14 press has been up to. And I say "the press", not "the</p> <p>15 Telegraph". "The press".</p> <p>16 MR MILLAR: But how close to the wall can you throw the</p> <p>17 penny doesn't help in terms of trying to envisage what</p> <p>18 a statutory framework would look like, or how much</p> <p>19 statutory material would influence the setting of the</p> <p>20 terms of the ethical code.</p> <p>21 You'll be familiar with the legislation that set up</p> <p>22 Ofcom. There were clear imperatives governing the</p> <p>23 formulation of the Ofcom code.</p> <p>24 LORD JUSTICE LEVESON: Well, I'd be surprised if I went down</p> <p>25 a route that sought to recommend a system that</p> <p style="text-align: center;">Page 38</p>	<p>1 How can I comment on what you're saying, because I don't</p> <p>2 know what you're saying?" Well, I don't yet know what</p> <p>3 I'm saying, but what I am saying is that you can help me</p> <p>4 by identifying where the lines could be drawn without</p> <p>5 offending what for you are absolutely unwaivable</p> <p>6 principles.</p> <p>7 MR MILLAR: Sir, you know the answer to that question, with</p> <p>8 respect. The answer is that any form of statutory</p> <p>9 intervention in the process of regulating the newspapers</p> <p>10 is unacceptable to us.</p> <p>11 LORD JUSTICE LEVESON: But I don't understand why,</p> <p>12 Mr Millar. I mean, I mean it. Mr Dacre last September</p> <p>13 recognised there was a possibility of a need for</p> <p>14 statutory underpinning. Not for a statute that</p> <p>15 regulated the press. I well understand the view of the</p> <p>16 press on that subject. But one that would facilitate</p> <p>17 the provision of powers for the press itself to set up</p> <p>18 an independent regulatory regime.</p> <p>19 MR MILLAR: Well, sir, there are objections of principle.</p> <p>20 They're set out in our written submissions at paragraphs</p> <p>21 113 and following. I can go through them again. I fear</p> <p>22 I'd be repeating what's in the document and evidence and</p> <p>23 submissions that you've heard from other core</p> <p>24 participants.</p> <p>25 In summary, the concern is that once the door is</p> <p style="text-align: center;">Page 40</p>

<p>1 open to some form of statutory intervention, which we 2 have not had in this country for hundreds and hundreds 3 of years -- and I'm going to deal with Ireland in 4 a moment -- we're in a different ballpark. 5 We're in a different ballpark because the principle 6 has been breached. However benign the recommendations, 7 sir, you may make, or however close to the wall the 8 penny happens to be when you publish your report, 9 there's no guarantee that the penny, having been put 10 down on the pavement, will stay at that point that close 11 to the wall. 12 LORD JUSTICE LEVESON: Well, I understand that point, and 13 I heard what Lord Wakeham said about the wishes of 14 Parliamentarians. All I can say is, looking at the 15 experience of the last 50 years, I've seen no evidence 16 of Parliament wanting to get more involved and to go 17 further than the press has been prepared to go. 18 Look at the outcome of each Royal Commission. Look 19 at the outcome of Calcutt 1. Look at the outcome of 20 Calcutt 2. Look at what happened after the death of 21 Princess Diana. They've not been straining at the leash 22 to impose ever more rigorous statutory interventions. 23 MR MILLAR: No, but if recommendations are made by you, sir, 24 to do it and the process is started, then the point is 25 we are in a different ballpark.</p> <p style="text-align: center;">Page 41</p>	<p>1 involved in the regulation are authors of their own 2 fate, and they have achieved the regulatory system that 3 they've achieved without legislative intervention, 4 without coercion. And that is in itself an end and in 5 itself important in a democracy. 6 I can say that in most instances -- nearly all 7 instances where one finds oneself, as I do, in emerging 8 democracies, discussing press regulation through the 9 auspices of international agencies, the Council of 10 Europe, the EU, the OSC -- the default position, the 11 primary position, is always and overwhelmingly the 12 arrangement of regulation and regulatory arrangements 13 without the involvement of the government. And there's 14 a very good reason for that and it's the one that I've 15 just given: that it gives people a stake in the result 16 of the regulation, which is going to make it more 17 effective, more likely to work. 18 We may have to just agree to disagree about this, 19 but -- 20 LORD JUSTICE LEVESON: I'm not agreeing or disagreeing at 21 all. I'm merely listening, Mr Millar. 22 MR MILLAR: You said that there are issues of principle 23 underpinning our position which you don't understand and 24 I'm putting them to you. We do understand them. We 25 believe in them passionately. This is our traditional</p> <p style="text-align: center;">Page 43</p>
<p>1 The Rubicon has been crossed. Prior to that, the 2 Rubicon hadn't been crossed. We're very concerned, not 3 least of all because of the vulnerable position of the 4 industry, that Parliament will take it upon itself to 5 overregulate, as Mr Barclay put it. Parliament has 6 a history of doing that, a tendency to do that. 7 Politicians and legislators are not subject to 8 a self-denying ordinance when it comes to the amount and 9 the content of regulation. Once they've got the bit 10 between their teeth, history tells us they can get quite 11 enthusiastic about it. So it's getting the bit between 12 their teeth that we're worried about. 13 There are other points of principle. The Government 14 and Parliament are not stakeholders in press regulation. 15 They should be apart from it and held to account by the 16 press. 17 LORD JUSTICE LEVESON: I agree with that. 18 MR MILLAR: Yes. It is an important achievement that 19 a society democracy such as ours can arrive at a system 20 of self-regulation without the involvement of statute or 21 Government that works. 22 You say, "Well, we have to give up on that idea 23 now". We say, "No, we don't have to give up on that 24 idea now. We have to persist in that idea." And it's 25 a very important idea because it means the people</p> <p style="text-align: center;">Page 42</p>	<p>1 in this country, this is the British traditional. It is 2 a massive step to throw out the history of a free press, 3 by which I mean a printed press that has no statutory 4 intervention as far as its regulation is concerned. It 5 is a very, very big step. 6 You can look at, sir, Ireland and you can look at 7 Scandinavia, as you have done, where there has been 8 statutory intervention in press regulation, but you have 9 to remember that there are dramatic differences between 10 newspaper industries in different countries. These are 11 not just to do with size. 12 Other countries have very different traditions in 13 relation to controls over the print media. Most other 14 countries have a weaker and at least more recent 15 tradition than we do of a press operating entirely free 16 of government intervention. There would not be the same 17 ingrained resistance, which is what you're encountering 18 from the industry, to statutory intervention that you 19 see in this country, no doubt making it easier to 20 introduce in those countries. 21 In fact, the best comparator is the United States, 22 where there is a comparable tradition to ours going back 23 to the First Amendment, where there's no agency-related 24 central government which can licence or regulate the 25 press or indeed the Internet. And that's an article of</p> <p style="text-align: center;">Page 44</p>

<p>1 faith under the First Amendment. 2 LORD JUSTICE LEVESON: Their press is also very different. 3 MR MILLAR: Their press is also very different in a lot of 4 respects. Structurally it's very different. But that's 5 not the point I'm making. The point I'm making at the 6 moment is that you may be comparing apples with oranges 7 if you compare the situation you face in the UK with 8 Ireland or Scandinavia. You certainly are, one would 9 have thought, so far as resistance to government 10 intervention is concerned. 11 Of course, it is with the US organisations providing 12 news services globally that our newspapers will 13 increasingly have to compete in the next few years. 14 This brings me on, sir, to the final few points 15 I wanted to make. I'm very mindful of the time and 16 I apologise for having gone over my limit. 17 LORD JUSTICE LEVESON: Don't worry, Mr Millar. This is very 18 important and I'm keen to hear it. I think we asked 19 people how long they wanted so we could sort out the 20 right amount of time. Rather than tried to shut people 21 down, we wanted to make sure that people had time to 22 develop the points they wanted to make, so make the 23 points you want to make. 24 MR MILLAR: Thank you. 25 We were at the point where you picked me up on the</p> <p style="text-align: center;">Page 45</p>	<p>1 So in those circumstances, we would say it's hardly 2 surprising, with respect, that the industry appears to 3 be almost unanimously supporting the PressBoF proposal, 4 and we would say that in these circumstances there is 5 a heavy onus on the Inquiry, if it is to recommend 6 statutory intervention in newspaper regulation, to show 7 why the PressBoF proposals will not ensure that the 8 shared mental assumptions and leadership aims in those 9 newsrooms that we're all concerned about change and 10 remain changed so as to avoid the problems the Inquiry 11 has identified. 12 We don't consider this has been shown or that it can 13 be, but the key point from our perspective is that the 14 industry will willingly commit to making these proposals 15 work. This is the best starting point for a new system 16 of regulation. No regulation through a mechanism about 17 which the industry, almost without exception, is 18 sceptical, has the same sort of chance of success. 19 Sir, those are my submissions. 20 LORD JUSTICE LEVESON: Thank you very much indeed, 21 Mr Millar. 22 Let's take a break now and then we'll carry on. 23 (3.18 pm) 24 (A short break) 25 (3.27 pm)</p> <p style="text-align: center;">Page 47</p>
<p>1 observation, and it was simply that, that we haven't at 2 this point seen any proposals formulated by the Inquiry 3 or Parliament itself. What I was saying was it is 4 a matter of concern for us, and you wouldn't expect 5 anything otherwise. 6 Aidan Barclay put it bluntly in his oral evidence. 7 We don't want to destroy an industry through 8 overregulation. We have no idea whether a regulatory 9 system created following a statutory intervention might 10 create this risk, or even a risk of damage to if not 11 destruction of the industry and therefore collaterally 12 damage TMG. 13 In particular, we don't know whether we will end up 14 subject to regulatory burdens flowing from statutory 15 intervention which our future competitors on the 16 Internet will escape. These are likely increasingly to 17 be aggregators, especially the social media platforms, 18 and domiciled abroad. 19 We're having some difficulty envisaging a statutory 20 provision that can be drafted that will be effective in 21 bringing them, by matter of obligation, into 22 a regulatory fold. We don't imagine they would take 23 that lying down. But bringing them in consensually, as 24 the PressBoF proposals have suggested, is a completely 25 different matter.</p> <p style="text-align: center;">Page 46</p>	<p>1 LORD JUSTICE LEVESON: Yes, Mr Dingemans. 2 Closing submissions by MR DINGEMANS 3 MR DINGEMANS: Sir, the aim of these closing submissions is 4 to supplement briefly the written submissions that have 5 already been filed on behalf of the Express and Star 6 newspapers and OK! Magazine. 7 May I make three short opening observations? 8 LORD JUSTICE LEVESON: Certainly. 9 MR DINGEMANS: First, by emphasising the importance of 10 a free press, you, sir, have repeated and repeated again 11 your recognition of this fact, that it is a starting 12 point for any consideration of the matters engaged by 13 the Inquiry. It is not a point that needs to be 14 developed. 15 Secondly, we do respectfully submit that the 16 evidence has shown that there was no phone or computer 17 hacking carried out by the Daily or Sunday Express, the 18 Daily Star or the Daily Star Sunday or at OK! Magazine. 19 This is important, given the background against which 20 the Inquiry was established, but it is clear from the 21 terms of reference, the evidence and what you have said 22 that it does not begin and end there. 23 Thirdly, it is essentially common ground that the 24 vital importance of the press brings with it 25 responsibility and rights and obligations. A free press</p> <p style="text-align: center;">Page 48</p>

<p>1 can itself be held to account by criminal, civil and 2 regulatory law, and I will address further submissions 3 on those aspects.</p> <p>4 May I turn first to the criminal law? There are 5 various statutes which regulate the behaviour of 6 journalists, and it is not necessary or appropriate to 7 say anything more about that now. But it is an 8 essential background against which considerations of 9 regulation need to be considered.</p> <p>10 Secondly, civil law --</p> <p>11 LORD JUSTICE LEVESON: Before you pass from crime, would you 12 agree that for good and understandable reasons, it is 13 much, much more difficult to pursue a criminal 14 investigation against a newspaper or a journalist 15 because of the respect that is a consequence of 16 Article 10(2)?</p> <p>17 MR DINGEMANS: Article 10(2) engages both civil, criminal 18 and regulatory law.</p> <p>19 LORD JUSTICE LEVESON: Yes. But, for example, not naming 20 sources, the way in which the search powers are framed, 21 all make it much more difficult. That's the first 22 point.</p> <p>23 The second point is that it requires a victim to be 24 not merely identified and identifiable, but to make 25 a complaint. And of course, as we've seen in the</p> <p style="text-align: center;">Page 49</p>	<p>1 attractive to all those attempting to maintain the 2 appropriate balance. And it might be thought that an 3 important part of your recommendations, sir, should 4 engage issues of accessibility for those complaining 5 about newspaper conduct as well as cost for the 6 newspapers of those complaints.</p> <p>7 LORD JUSTICE LEVESON: One of the things that I've 8 ventilated during the Inquiry is that a regulator should 9 have some arbitral arm which can do just that, and I'd 10 be interested to hear whether you have any submissions 11 on that, and in particular on the possibility that one 12 could recommend -- and I'm not there yet, but I'm 13 thinking about every possibility -- that if a newspaper 14 organ was not in the regulatory system that had the 15 arbitral arm, so that a complainant had to go to court 16 and incur costs, then cost shifting should operate in 17 a way that protected the victim, on the basis the 18 newspaper could sign up to a regime which would free it 19 of those costs.</p> <p>20 MR DINGEMANS: Can I just address both of those?</p> <p>21 LORD JUSTICE LEVESON: Yes.</p> <p>22 MR DINGEMANS: We had put in written submissions, which we 23 didn't repeat, in relation to a tribunal system.</p> <p>24 Obviously a system of arbitration depends on the consent 25 of both parties to be effective. And effectively it</p> <p style="text-align: center;">Page 51</p>
<p>1 context of a number of different aspects of the Inquiry, 2 that doesn't happen very often, because they don't know.</p> <p>3 MR DINGEMANS: There is certainly the need to know before 4 you can complain. I entirely accept that. That's 5 a feature also of civil law and much of regulatory law. 6 If people don't know what's going on, they can hardly 7 complain in whatever sphere. But for obvious reasons 8 I'm not developing submissions about the criminal law. 9 And you, sir, have well in mind the importance of not 10 going unnecessarily beyond that which is required for 11 the purposes of proper regulation.</p> <p>12 May I turn, then, to civil law and make briefly 13 a few points in relation to that?</p> <p>14 LORD JUSTICE LEVESON: Yes.</p> <p>15 MR DINGEMANS: We do submit a substantial vice in the area 16 of civil law relating to newspapers is the cost of 17 proceedings. This affects both those who wish to 18 complain and the newspapers.</p> <p>19 The civil law can be an effective system for the 20 regulation of relationships, but only where it is 21 generally accessible. And you, sir, are well aware of 22 all the jurisprudence on Article 6 and there's no need 23 to develop it.</p> <p>24 Any system providing for speedy, binding and final, 25 subject to appropriate appeals, resolutions would be</p> <p style="text-align: center;">Page 50</p>	<p>1 seems that people, when they're talking about arbitral 2 systems, are talking really about a tribunal system.</p> <p>3 Because of course, unless after the event both parties 4 give their consent, then it really adds nothing to the 5 current law as it exists.</p> <p>6 LORD JUSTICE LEVESON: Oh, I don't know, because if the 7 press have joined a system that provides a free and 8 speedy remedy, and the victim doesn't choose to go down 9 that route, then the costs system might work the other 10 way. If the press interest didn't sign up to the 11 system, then it would do so at its own cost.</p> <p>12 MR DINGEMANS: So long as there was balance between the two. 13 One can see many advantages of a system that is speedy 14 and accessible. All the evidence that you have heard, 15 sir, from both sides suggest that costs is a real 16 barrier to effective complaints in civil proceedings, 17 and if there was any way to remove those barriers, which 18 avoided duplication -- the last thing one wants is -- 19 and a complaint that was directed at the current system 20 is that people could make their complaints, go through 21 the regulatory system, and then use that really to 22 piggyback civil proceedings, whether that happens very 23 much or not.</p> <p>24 LORD JUSTICE LEVESON: No, it was nobody suggesting that it 25 was a regulatory system in the end, now, whatever they</p> <p style="text-align: center;">Page 52</p>

<p>1 might have thought before.</p> <p>2 MR DINGEMANS: Yes.</p> <p>3 LORD JUSTICE LEVESON: But I agree with your proposition if</p> <p>4 you put it this way: it's very unhelpful only to be able</p> <p>5 to go to court.</p> <p>6 MR DINGEMANS: Yes. We do respectfully make that</p> <p>7 submission, sir, and we do make the principal submission</p> <p>8 that costs become a barrier not only to those that need</p> <p>9 to complain but also to the newspapers that are dealing</p> <p>10 with the complaints that are made against them.</p> <p>11 May I mention briefly one other area of civil law,</p> <p>12 and that's the law of privacy. I don't propose to</p> <p>13 develop the very detailed submissions that have been put</p> <p>14 in on the law of privacy and its development, but I hope</p> <p>15 I can make this submission. Back in 1990, when</p> <p>16 David Calcutt QC, to whom there's already been</p> <p>17 reference, was appointed to head the departmental</p> <p>18 committee into measures necessary to give protection to</p> <p>19 individual privacy and whether statute was required,</p> <p>20 that led to the 1991 establishment of the Press</p> <p>21 Complaints Commission, but the failure to develop any</p> <p>22 statutory law on privacy was then overtaken by, of</p> <p>23 course, the jurisprudence incorporated by the Human</p> <p>24 Rights Act in 1998, and it might be thought that when</p> <p>25 you analysed the vast majority of the complaints before</p> <p style="text-align: center;">Page 53</p>	<p>1 have formed the backdrop to some of the cases before</p> <p>2 you.</p> <p>3 Can I then turn to regulation and start with the</p> <p>4 principled aim of regulation. In our submission, the</p> <p>5 most effective statement about regulatory intent was</p> <p>6 said in relation to the regulation of lawyers, who are</p> <p>7 also known to sin and fail, in <i>Bolton v The Law Society</i>,</p> <p>8 and that is in 1994, 1 Weekly Law Reports, and that was</p> <p>9 Lord Bingham in the Court of Appeal effectively setting</p> <p>10 out the principled aim of regulation, and it is not to</p> <p>11 punish, that can be an effect of regulation, and it is</p> <p>12 not to compensate, that can be an effect of regulation;</p> <p>13 it is to ensure that maintenance and indeed the</p> <p>14 enhancement of standards in the regulated area.</p> <p>15 LORD JUSTICE LEVESON: I think that's tremendously</p> <p>16 important, because it's quite different. It isn't</p> <p>17 sufficient to say, well, there's the criminal law or</p> <p>18 there's the civil law.</p> <p>19 MR DINGEMANS: Yes.</p> <p>20 LORD JUSTICE LEVESON: There is something different.</p> <p>21 MR DINGEMANS: They can overlap, and it would be an absurd</p> <p>22 advocate who made the submission that they don't</p> <p>23 overlap, but the principled aim of regulation is</p> <p>24 different from both the criminal law and civil law, but</p> <p>25 it has flip sides because people talk in terms of</p> <p style="text-align: center;">Page 55</p>
<p>1 you and consider the general nature of the culture,</p> <p>2 ethics and practices of the press, that many of these</p> <p>3 take place against a law of privacy which -- and it is a</p> <p>4 failure of the law and has been acknowledged as such --</p> <p>5 has been less than certain. Perhaps it is now beginning</p> <p>6 to develop in a way that responsible journalists and</p> <p>7 those advising consumers and those making complaints can</p> <p>8 have some better idea of what the outcome is going to</p> <p>9 be, but uncertainty in the law, particularly in this</p> <p>10 area, has been a particular vice.</p> <p>11 In that respect, of course, sir, you have to deal</p> <p>12 with the fact of the different categories of people and</p> <p>13 their approaches to privacy. I've set that out in</p> <p>14 paragraph 9 of your written submissions, but in our</p> <p>15 submission there are people who provide details of their</p> <p>16 private life which others consider to be far too much</p> <p>17 information, and that you can see from some of the</p> <p>18 magazines and social media, and there are some people</p> <p>19 who are happy and content with good press coverage, even</p> <p>20 where it is intrusive, but are then very unhappy with</p> <p>21 negative press coverage, particularly where it is</p> <p>22 intrusive, and there are others who are very protective</p> <p>23 about their privacy full stop and end of story, but</p> <p>24 people don't always stay in those same categories, and</p> <p>25 of course the difficulties of trying to identify that</p> <p style="text-align: center;">Page 54</p>	<p>1 regulators having substantial powers to fine, as if that</p> <p>2 was in some ways a shortened form of the criminal law</p> <p>3 and this was a more effective way of punishing</p> <p>4 wrongdoing, that is again to miss the substantial point</p> <p>5 of regulation.</p> <p>6 Can I then turn to some bright lines we submit in</p> <p>7 relation to regulation? First, there should be no</p> <p>8 current editors on the regulatory body. This is an</p> <p>9 industry which is still too small to enable persons to</p> <p>10 be seen to be independent; whether they are or not is in</p> <p>11 some respects not the thing, but to be seen to be</p> <p>12 independent of the bodies which they are regulating. So</p> <p>13 far as individual titles are concerned, and it's no</p> <p>14 secret that those that I represent are not current</p> <p>15 members of the PCC, it is again too small that</p> <p>16 animosities or perceived animosities and loyalties or</p> <p>17 perceived loyalties could undermine what could otherwise</p> <p>18 be a proper functioning body.</p> <p>19 Secondly, it is necessary to consider the scope of</p> <p>20 regulation. Is it to govern printed media alone,</p> <p>21 because we know that there are systems for regulation of</p> <p>22 television and radio, and importantly, and my learned</p> <p>23 friend Mr Millar has already dealt with this, is it to</p> <p>24 extend to the Internet?</p> <p>25 In News International's closing overview at</p> <p style="text-align: center;">Page 56</p>

14 (Pages 53 to 56)

<p>1 paragraph 35, they set out the Reuters report into 2 digital news and give the reference for that, and they 3 note that estimated 77 per cent of the UK population 4 uses the Internet -- so of course it's self-selecting in 5 that respect -- accesses the following news sources in 6 a week: online, 82 per cent; television, 76 per cent; 7 print, 54 per cent; and radio, 45 per cent. We do 8 respectfully submit that any system of regulation of the 9 printed media which excludes the Internet media is one 10 that is not going to be comprehensive. 11 LORD JUSTICE LEVESON: All right, let me just understand 12 what that means. Do you there mean to submit that there 13 ought to be a system devised that requires, mandates, 14 those that operate on the Internet to join, or do you 15 mean to suggest that you should devise a system that 16 encourages but does not compel, in other words, those to 17 join, because all you've said is that the system should 18 not exclude. 19 MR DINGEMANS: I do propose to develop that submission, but 20 to tell you where I go in that, and it's part predicated 21 in our written submissions, is this: we do respectfully 22 submit that given the comparative decline of print media 23 and what will be the increasing prominence of Internet 24 media, that any system of future regulation must be 25 comprehensive of all news media. Therefore, one is</p> <p style="text-align: center;">Page 57</p>	<p>1 MR DINGEMANS: We respectfully submit that the regulatory 2 body must have the power to act on complaints, but also 3 the power to act on clients of its own notion. It might 4 be thought that a historic failing of the body was its 5 inability to act in response to other than formal 6 complaints. 7 We do also submit that the body should have the 8 power to deal with the relevant applicable standards, 9 for this principled reason, is that it draws a further 10 dividing line between any system of appointment of that 11 body, which may or may not, depending on your 12 recommendations and depending on legislative take-up, 13 take statutory involvement, and therefore, for example, 14 the Editors' Code, which has by and large seemed in the 15 evidence to have withstood much analysis, can be set by 16 that body. 17 LORD JUSTICE LEVESON: Is your bright line about editors 18 sufficiently broad as to extend to objecting to their 19 involvement in the creation or at least the advice as to 20 the creation of a code? 21 MR DINGEMANS: No. Not in that sense. At the moment you 22 have a code which will continue, no doubt, to be 23 refined, but so far as the regulatory acting on 24 complaints and dealing with other matters, as you know, 25 the evidence why we're not current members of the PCC is</p> <p style="text-align: center;">Page 59</p>
<p>1 likely to be in a situation where perhaps little points 2 apart, and we'll come to those, you are in a system of 3 voluntary regulation, and therefore you're in a system 4 whereby economic and real factors, being as important as 5 they are to decision-making, one is in a system whereby 6 you are encouraging persons to join a proper regulatory 7 body that has so many advantages to all that they will 8 become members of it. 9 LORD JUSTICE LEVESON: You'll have to tell me what the 10 advantages are going to be for the Internet providers. 11 MR DINGEMANS: I'll -- 12 LORD JUSTICE LEVESON: Please. 13 MR DINGEMANS: -- come to those. 14 LORD JUSTICE LEVESON: In your own time, Mr Dingemans. 15 MR DINGEMANS: Yes. But in our submission, there are real 16 difficulties, and part of the difficulties in compelling 17 Internet providers -- those have been developed in other 18 submissions and I'm not going to repeat those, but the 19 real difficulties with compelling Internet providers of 20 news show that the need to ensure that there is not as 21 it were an imbalance of regulation become more 22 important. 23 Can I then just continue to address some other 24 bright lines for the regulatory body? 25 LORD JUSTICE LEVESON: Yes.</p> <p style="text-align: center;">Page 58</p>	<p>1 before you. And, sir, you may have summarised it 2 accurately when you pointed to personalities and 3 animosities, but that plainly wouldn't extend to the 4 aspect of drawing up the applicable standards, and there 5 are maybe advantages in that respect. 6 We also respectfully submit that there may be times 7 when an editor has had sufficient time away from the 8 industry so that there are no current loyalties or 9 animosities or indeed historic loyalties and 10 animosities, they might then become suitable, but that 11 would inevitably be a matter for the body appointing 12 those to be members of the new regulatory body. 13 Can I in that respect turn to our final bright line 14 for submission, and it is this: we do respectfully 15 submit that the constitutional significance of the free 16 press is such that the body appointing the persons to 17 the regulatory body should have protections equivalent 18 to those governing the appointment of Judicial 19 Appointments Commissioners. The judiciary has its own 20 constitutional importance in our society, and we do 21 respectfully submit that the press has a vital role to 22 play and that it is essential to put clear blue water 23 between Parliamentary bodies and the regulators. There 24 have been suggestions in the evidence that a headhunter 25 might be appointed to find the next people, and we do</p> <p style="text-align: center;">Page 60</p>

<p>1 respectfully submit that whilst the headhunter would no 2 doubt do a conscientious job, may in fact find the best 3 person for the appointment, there's none of the 4 transparency and systemic guarantees against 5 interference that are required in these areas. 6 In that respect, if you are in the slightest bit 7 interested to read about that, Baroness Prashar wrote an 8 interesting article about the current failings in the 9 system for the office for appointment of -- 10 LORD JUSTICE LEVESON: You mentioned that in paragraph 19 of 11 your submissions, but don't provide a reference. 12 MR DINGEMANS: Ah, I did provide it in my earlier 13 submissions, which is why I didn't provide another 14 reference. 15 LORD JUSTICE LEVESON: All right, then that's my fault. 16 MR DINGEMANS: No, no, I can well understand a desire not to 17 read the earlier submissions. 18 LORD JUSTICE LEVESON: Oh no, no, I'm happy to read them, 19 but I didn't read them alongside these. I think I might 20 have read the paper, but I just want to check. 21 MR DINGEMANS: No, it is there. Effectively at the moment 22 there's still no guarantee of Nolan compliance 23 appointments. They have all been that, but there is not 24 statutory guarantee on that, and that was a matter on 25 which Baroness Prashar made a specific comment. But we</p> <p style="text-align: center;">Page 61</p>	<p>1 each week and then expect to be in front of them the 2 week after. 3 LORD JUSTICE LEVESON: (Nods head) 4 MR DINGEMANS: We do respectfully submit that if you deal 5 with that aspect by ensuring credible public 6 appointments to the regulatory body and then put in 7 proper systems for incentivised joining for the bodies 8 that are carrying out the printing, whether on the 9 Internet or by way of print media, then there may be 10 developments in that respect. 11 As far as the -- 12 LORD JUSTICE LEVESON: But what I couldn't ever cope with 13 there is somebody who's deliberately placed themselves 14 outside the jurisdiction, but then no system, either of 15 civil law or regulation, would capture them unless they 16 want to come into it. 17 MR DINGEMANS: No system of criminal, civil or regulatory 18 law would catch them, no, sir, and in those 19 circumstances, ensuring that you have a voluntary system 20 which is attractive to all -- for the proper reasons, 21 not because they'll then just make decisions in their 22 own favour, but attractive to all the relevant parties, 23 we do respectfully submit is something that would be 24 a proper way to go forward. 25 May I finish in the six minutes I have remaining --</p> <p style="text-align: center;">Page 63</p>
<p>1 do respectfully submit that any system for appointment 2 to the new regulatory body ought to include the Nolan 3 guarantees by way of appointment. 4 Those were some distinct submissions in relation to 5 regulation. 6 So far as the line between whether it needs to be 7 statutory or should be voluntary, we do respectfully 8 submit that any principled system of tribunals or 9 arbitral tribunals, as you have suggested, may provide 10 their own incentives for that joinder by means of the 11 print media and indeed others. For example, you have 12 important publications, such as you've referred this 13 afternoon to Private Eye, standing outside the PCC 14 system, which has run its own campaigns about costs of 15 libel proceedings, which in itself might then consider 16 a new regulatory body with the cost-shifting principles 17 that you have referred to do have such advantages that 18 it might be worth joining. 19 LORD JUSTICE LEVESON: Yes. The reason I mentioned 20 Private Eye was because Mr Hislop's reasons for not 21 joining the PCC are very different from 22 Northern & Shell's reasons for leaving, are themselves 23 principled, and understandable in the context of the 24 work that Private Eye does. 25 MR DINGEMANS: Yes. He could hardly publish Street of Shame</p> <p style="text-align: center;">Page 62</p>	<p>1 LORD JUSTICE LEVESON: Mr Dingemans, we asked how long 2 everybody wanted, as I said to Mr Millar. You take the 3 time that you want to to develop your views. They are 4 very, very important, because Northern & Shell are 5 different to many of the other core participants because 6 they have a very different view of regulation, for 7 whatever reason, so don't worry about the time. 8 MR DINGEMANS: Well, I still intend to be six minutes. 9 LORD JUSTICE LEVESON: All right. 10 MR DINGEMANS: It was just to address, sir, your questions 11 on culture, practices and ethics of the press and some 12 suggestions for consideration, and we do respectfully 13 submit that they are no more nor less than that. 14 The first is this: it is notable that in British 15 print journalism there is a general and absolute 16 fearlessness on the part of journalists of politicians, 17 so journalists do not fear politicians, and that is 18 a remarkable feature of journalism in this jurisdiction, 19 and something that necessarily falls to be preserved. 20 LORD JUSTICE LEVESON: What about the converse? 21 MR DINGEMANS: I hadn't proposed -- I had seven 22 propositions. I wasn't going to deal with the 23 politicians' views. 24 LORD JUSTICE LEVESON: But, you see, it is actually 25 important, isn't it?</p> <p style="text-align: center;">Page 64</p>

<p>1 MR DINGEMANS: Yes.</p> <p>2 LORD JUSTICE LEVESON: All right.</p> <p>3 MR DINGEMANS: Because plainly the relationships between</p> <p>4 press and politicians are relevant, but if you are</p> <p>5 looking for one to fear the other, given the power that</p> <p>6 is held -- the legislative power that is held by</p> <p>7 politicians and the executive power that is held by</p> <p>8 politicians, we do respectfully submit that it is a much</p> <p>9 better society that has the press fearless of</p> <p>10 politicians than the press fearful of politicians.</p> <p>11 LORD JUSTICE LEVESON: I would like them neither to be</p> <p>12 fearful of the other, but each to recognise that the</p> <p>13 other is doing an important job in our democracy. Or is</p> <p>14 that too much to hope for?</p> <p>15 MR DINGEMANS: I suspect, sir, you would find that in the</p> <p>16 evidence before you.</p> <p>17 Can I turn to the second proposition?</p> <p>18 LORD JUSTICE LEVESON: Yes.</p> <p>19 MR DINGEMANS: This comes from the evidence of some of the</p> <p>20 editors and journalists that gave evidence before you,</p> <p>21 which was that they do genuinely have a relentless</p> <p>22 desire to communicate the news as they see it.</p> <p>23 LORD JUSTICE LEVESON: Yes.</p> <p>24 MR DINGEMANS: Thirdly, they do have a sensitivity to their</p> <p>25 own readers' opinions, but it might be thought a general</p> <p style="text-align: center;">Page 65</p>	<p>1 aspects, but when one looks at the example of</p> <p>2 Mr Jefferies, to the extent that it even engaged the</p> <p>3 criminal law of contempt, or civil criminal law of</p> <p>4 contempt, that there was a stunning lack of judgment in</p> <p>5 some of the newspaper coverage.</p> <p>6 We have respectfully submitted that the Attorney's</p> <p>7 current use of the laws of contempt, which have existed</p> <p>8 and continue to exist, is something to be commended.</p> <p>9 LORD JUSTICE LEVESON: Yes.</p> <p>10 MR DINGEMANS: The sixth proposition was this, that the</p> <p>11 evidence shows that those proprietors and senior members</p> <p>12 of the profession have a strong continuing desire to</p> <p>13 exist by making a profit.</p> <p>14 LORD JUSTICE LEVESON: Yes.</p> <p>15 MR DINGEMANS: And seventhly, and it may explain some of the</p> <p>16 stories where people have thought that a factual</p> <p>17 background exists and gone to print too early, there is</p> <p>18 a desire to be a step ahead of other publications.</p> <p>19 Those were seven general propositions. I'm sorry</p> <p>20 they're not fact-specific, but I hope you'll forgive me</p> <p>21 for not making them fact-specific, for your</p> <p>22 consideration.</p> <p>23 LORD JUSTICE LEVESON: Well, that's a very interesting</p> <p>24 analysis. I think I can think of lots of examples of</p> <p>25 almost every single one.</p> <p style="text-align: center;">Page 67</p>
<p>1 insensitivity to public opinion. That may be a good or</p> <p>2 a bad thing, but we respectfully submit it's established</p> <p>3 on the evidence.</p> <p>4 Fourthly, the evidence shows that they have</p> <p>5 a tendency to see news as divorced from the individuals</p> <p>6 involved.</p> <p>7 Fifthly, in some areas, there has been shown</p> <p>8 a stunning lack of judgment to the extent that it might</p> <p>9 engage the criminal law, and I say no more about that;</p> <p>10 about where lines can properly be drawn between the</p> <p>11 public interest in acquiring news and privacy.</p> <p>12 LORD JUSTICE LEVESON: Would it be fair -- and I don't</p> <p>13 require you to answer this question, Mr Dingemans, if</p> <p>14 you don't want to, but just thinking about your last two</p> <p>15 points, and putting them together to say that it's</p> <p>16 possible that that combination explains what happened in</p> <p>17 relation to Mr Jefferies.</p> <p>18 MR DINGEMANS: Indeed, sir. Inevitably, because they are</p> <p>19 skilled, they've been trained to deal with news, but</p> <p>20 aspects of the training, you might have thought that</p> <p>21 some aspects of the academic aspects of the training</p> <p>22 still don't necessarily deal with the fact that there</p> <p>23 are individuals at the end of a news story and in some</p> <p>24 respects you have to understand that the journalist</p> <p>25 can't stop printing the news because of those personal</p> <p style="text-align: center;">Page 66</p>	<p>1 MR DINGEMANS: I'm very grateful. Those are my submissions.</p> <p>2 LORD JUSTICE LEVESON: Thank you.</p> <p>3 Right. Well, we have a rather longer day tomorrow</p> <p>4 than we would have had, but so be it. Thank you very</p> <p>5 much. Tomorrow morning, 10 o'clock.</p> <p>6 (4.00 pm)</p> <p>7 (The hearing adjourned until 10 o'clock the following day)</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p style="text-align: center;">Page 68</p>

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