

NI Group Limited  
D. J. Mohan  
First Statement  
"DJM1"  
14 October 2011

**IN THE MATTER OF THE LEVESON INQUIRY INTO THE CULTURE, PRACTICES AND ETHICS OF THE PRESS**

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**WITNESS STATEMENT OF  
DOMINIC JAMES MOHAN**

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**(1) State who you are and provide a brief summary of your career history in the media.**

**1** I am the Editor of The Sun. I was appointed in August 2009.

**2** I began my career in the media in 1990 at the press agency, the London News Service. I then worked at a number of newspapers including The Sunday Mirror and The News of The World. I joined The Sun as a reporter in 1996. In 1998 I was promoted to Editor of Bizarre and held that post for five years. In 2003 I was given my own weekly opinion column and in 2004 became Associate Editor (Features). In 2007, I was made Deputy Editor and in 2009 I was made Editor.

**(2) Explain how you understand the system of corporate governance to work in practice at the newspaper where you are employed with particular emphasis on systems to ensure lawful, professional and ethical conduct.**

**3** There are a number of different ways in which we strive to ensure that everyone on the paper behaves in a lawful, professional and ethical way.

*(i) The PCC Code*

**4** The main guide to ethical conduct for Sun journalists in their day-to-day work is the PCC Code, which we take very seriously. All journalists are aware that the PCC Code forms part of their obligations under their contract of employment and the Code is incorporated in the staff handbook and HR policies displayed on the News International ("NI") intranet.

**5** To make it even more explicit, a direct obligation to adhere to the PCC Code or face disciplinary proceedings, which in the most severe cases could lead to dismissal, is being written into all new staff contracts.

- 6** The importance of the Code is also underlined through regular discussion of it, as well as training sessions. For example, if the circumstances surrounding a story proposed at the daily news conference raise issues of privacy versus public interest, then there will often be a discussion concerning the PCC Code. Depending on the story, those discussions may then continue privately among senior executives after the meeting. Where difficult issues arise, we will often liaise with the PCC prior to publication. This is mainly undertaken by our Executive Editor, Fergus Shanahan, and our Managing Editor, Richard Caseby.
- 7** We have regularly invited the PCC to run training seminars for Sun journalists. There were five such sessions in 2009 and two in 2010, which involved the PCC's assistant director, Will Gore, leading the group through six real-life PCC complaints covering issues of privacy, mental health, accuracy, reporting of suicide and reporting of children. I understand the case studies discussed in these sessions appear behind tab 13 of file 21 of the bundle of documents provided to the inquiry on behalf of NI (the "NI bundle").
- 8** Any failure to comply with the PCC Code can result in a PCC adjudication being published in all editions. I am proud that as Editor I have only had one partial PCC complaint upheld against the paper.
- (ii) Training sessions*
- 9** In addition to the PCC training seminars, we hold other training seminars. Recent examples are:
- (i) A seminar held in January 2011 led by Lucy McGhee, director of communications at the West London Mental Health Trust, for about a dozen news staff on the correct terminology to use in relation to patients being cared for in secure units. She also examined the work carried out by medical staff at Broadmoor Hospital.
- (ii) Training sessions held in September 2011 on the latest NI guidelines on the new Bribery Act. These were hosted by Richard Caseby, the Managing Editor, Justin Walford, the Sun's in-house lawyer and a legal team from Allen & Overy LLP who helped draft the guidelines. To date, about 100 Sun staff have attended these sessions on the Bribery Act guidelines.
- We are also preparing to schedule other sessions this year on suicide (the Samaritans); HIV/Aids (National Aids Trust) and travellers and gypsies (Friends, Families and Travellers).
- (iii) Role of lawyers*
- 10** The two Sun lawyers, Justin Walford and Ben Beabey, also have an important role to play. They give pre-publication advice to senior executives and journalists on libel, privacy, contempt, confidence, data protection and copyright. In addition there is a rota of night

lawyers, usually barristers, who read copy for libel. The lawyers also deal with post-publication complaints and litigation in consultation with the Managing Editor. In the pre-publication process the lawyers' responsibility is to give advice about any potential breach of law or indeed the PCC Code and to assist in finding legally safe and ethically sound ways of publishing stories. Their advice is always considered seriously by Sun executives and journalists, although any final decision to publish remains with the Editor.

*(iv) Internal policies*

- 11 The NI staff handbook is a comprehensive guide to behaviour expected by the company and is issued with all staff contracts. This contains copies of a number of company policies and guides on, for example, data protection and freedom of information. There is also the News Corp Standards of Business Conduct book which sets out clearly the conduct expected of all employees in the group. This has recently been updated and issued in hard copy to all staff. I understand that copies of all of these documents have been included in the NI bundle.
- 12 In addition, a new process for paying cash to sources was introduced in September. A request for any cash payment must now be fully logged and signed for in ink by the head of department, the Editor or Deputy Editor, the Managing Editor or Deputy Managing Editor and the journalist who requested it. The logging book has a disclaimer stating that the journalist has been trained in the Bribery Act and will not contravene the NI policy. I describe the previous practice in relation to cash payments at paragraph 46 below. There are also certain procedures in place in relation to payments to contributors, which I describe at paragraph 45 below.

*(v) Discipline*

- 13 On the rare occasions that standards are not met, then we have disciplinary procedures which deal with this. This is an HR process led by the Managing Editor. For example, in 2007, a news reporter was given a final written warning for incorrectly identifying an individual as a prostitute. In October this year, a member of our online staff was sent a warning letter after publishing the wrong verdict in the Amanda Knox appeal against her convictions on The Sun's website. (The Italian court had found her guilty of slander but not murder.)

*(vi) Readers*

- 14 Finally, the Sun's readers are also a great barometer and I pay close attention to their letters, phone calls and emails. These can often give excellent insight into whether we have got something right or not and this is a useful soft control.
- (3) What is your role in ensuring that the corporate governance documents and all**

**relevant policies are adhered to in practice? If you do not consider yourself to be responsible for this, please tell us who you consider to hold that responsibility.**

- 15** As Editor, I have ultimate responsibility for ensuring that our corporate governance system on the paper works and is adhered to in practice. On a day-to-day basis I delegate these responsibilities to the Managing Editor. He is responsible for logging cash payments, negotiating with editorial department heads and the legal department over individual queries regarding, for example, the Bribery Act compliance, organising training seminars for staff and liaising with the HR department and me over any disciplinary issues.
- 16** My working day is dominated by considerations and decisions relating to the increasing restraints and restrictions to which we are subject in the sphere of libel, privacy injunctions, the PCC code and, in the latest instance, the new Bribery Act. Much of my time is spent discussing these issues with the Managing Editor, my Associate Editors and the Sun's legal team.
- (4)** **Explain whether the documents and policies referred to above are adhered to in practice, to the best of your knowledge.**
- 17** To the best of my knowledge, the policies referred to above are adhered to in practice and this compliance is the subject of a number of checks. For example, senior executives and the legal team who read copy immediately before publication are aware of the PCC Code, and have undergone PCC training seminars (see paragraph 7 above), and they can suggest halting publication should they suspect any breach. The senior executives can investigate further and should any breach be discovered they can admonish the journalist immediately, or in a serious case, escalate the issue by referral to the Managing Editor and Editor. I have mentioned at paragraph 13 above some examples of disciplinary action we have taken. I understand that details of dismissals for misconduct are contained in NI's response to the documentary requests made by the inquiry.
- 18** If the PCC Code is breached, a complaint is received and it is found to have merit, then a correction will be published. Any published correction as a result of a PCC complaint is negotiated directly with the PCC who in turn liaises with the complainant. Corrections are never placed further back in the newspaper than the original article, except for those connected with page one stories where the correction is published on page two. However, in July, we carried a front-page cross-reference headed "Judge is cleared" which referred to a clarifying story on page 2 following the conclusion of an investigation by the Office for Judicial Complaints (the "OJC"). A judge had been accused of being "influenced by alcohol" at a trial in Swindon where he acquitted a man of raping an eight year-old girl after the jury failed to reach a verdict. According to the original story in the Sun, the girl's mother had likened the judge's behaviour at trial to that "of a person influenced by alcohol". The

judge complained to the PCC about the Sun's projection of the story. When the OJC rejected the mother's claim and cleared the judge, the clarifying story, which had been negotiated with the judge through the PCC, was published. A copy of the story is attached to this statement behind tab (a) of exhibit DJM1.

- (5) Explain whether these practices have changed, either recently as a result of the phone hacking media interest or prior to that point, and if so, what the reasons for the change were.**
- 19** We are always reviewing our practices and policies. For example: private investigators can no longer be used at NI without the express permission of the Chief Executive Officer, as I noted above, a new system of governance for cash payments was introduced in September 2011 in light of further allegations during the police investigation into The News of the World; staff have also been undergoing training covering journalistic practices, particularly in relation to the new Bribery Act; and a new whistle-blowing helpline is now available.
- (6) Where does the responsibility for checking sources of information (including the method by which the information was obtained) lie: from reporter to news editors/showbiz editor/royal editor to editor, and how is this done in practice (with some representative examples to add clarity)?**
- 20** The responsibility for checking sources of information lies firstly with the reporter, then upwards through the News Editor and then, depending on the story, to senior editors and myself. However, in practice, confidential sources belong to the reporter and he is under no compulsion to reveal them. Relationships in the newsroom are built on trust and experience and reporters are expected to reassure their editors as to the veracity and legitimate provenance of their sources without always specifically revealing them. Reporters are expected to behave professionally, lawfully and ethically and they are responsible for adhering to the PCC Code as required by the staff handbook. (See answer to question 2). They will inform their desk head of a story they are working on and the circumstances behind it. If the journalist needs guidance on any ethical matter they consult their desk head or the Managing Editor who may in turn consult with the Editor. It is important for journalists to have an avenue of neutral consultation open to them (to the Managing Editor) which takes them outside the white heat of the daily news production process.
- 21** The Sun's stories come from many sources: big agencies like the Press Association who are contracted to supply the newspaper; a network of smaller regional agencies who are paid for each story; press releases and members of the public. Some tipsters respond to our in-paper phone line, text number and email address which offers them the chance to supply stories in exchange for payment. Like all of our suppliers, these sources are

expected to act in a legal and ethical way and if we have reason to suspect that they have not done so, then we will not publish a story.

- 22** In addition to these sources, our reporters are expected to nurture a number of private, personal and reliable sources. If a story is obtained from such a source in confidence then there is no obligation on the journalist to disclose that source. In fact, the PCC Code says that they have a "moral obligation" to protect it. Reporters are generally unwilling to share these sources because they owe their sources that duty of confidence and also because they are the lifeblood of their career, should they wish to change employers. Once a source is named and shared with others the reporter loses control over whether that source might be identified in any complaint or litigation. An editor may be therefore aware of the general area a certain story came from and the legitimacy of the source, but not necessarily their precise identity.
- 23** It depends on the individual story but corroboration and/or guidance about the accuracy and circumstances of the story will usually be sought from a spokesman, agent or the individual concerned. To give a broad example, a story may be mentioned by the News Editor to the Editor in conference or outside that meeting. Myself or a senior executive may ask what the source is on the story and which reporter is involved. We will then have a clearer idea on the likely veracity and provenance of that source. I may ask for the reporter or the News Editor to try and speak to a corroborative source and/or check with an individual, agent or organisation concerned. Myself or a fellow senior executive will sometimes then speak to one of our own contacts or a representative, depending on the subject, for our own reassurance – but it very much depends on the individual story.
- 24** Here is an example of the germination of a front page story: on 5 October 2011, a reporter received information that a high-profile actor had been arrested for child abuse. He telephoned the local police press office later that day. They confirmed that a man had been arrested in the local area for that offence, and confirmed his age; both the age and area corresponded with what we knew about the actor. When I asked the News Editor about the sourcing, I was told that the information had come from a legitimate source to a trusted and experienced reporter and that the police had confirmed key elements. I therefore ran the story on page one the following day.
- 25** When a tipster rings the news desk hotline after reading our page two advertisement asking readers to call in with stories, he/she will speak with the News Editor or one of the Assistant News Editors. The News Editor will ask the source how they know this information, why they think it to be true and who else might corroborate their assertions. Depending on the story, the source may be asked for documentation, photographs or any other material that might support their story. If the News Editor considers the tip to be

interesting and potentially true, a reporter will be assigned and they will be expected to pursue evidence that might prove the story, for example, meeting the tipster, following the tipster's other leads, using the reporter's own contacts and putting any allegations to a subject or agent. If the News Editor or one of his assistants believes that the information may have been obtained through suspect means or that purchasing that information would be in breach of, say, the Bribery Act or the PCC Code, then the story will be declined unless an overriding public interest is identified.

- 26** When the source is a regular source and has a proven track record of supplying reliable tips the information may, on occasion, be put directly to the subject or agent at the heart of the story. More usually, a story is second and sometimes third sourced before it is put to the subject.
- (7)** **To what extent is and should an editor be aware of the sources of the information which make up the central stories featured in your newspaper each day (including the method by which the information was obtained)?**
- 27** As I said above, an editor may be aware of the general area a particular story came from and its legitimacy, but won't necessarily know the identity of the source. It is difficult to say what the position normally is, as it varies so much from day to day. If there are a number of controversial stories in the paper, I will often delegate the checking of some of them to senior editors, so that I can focus on others.
- (8)** **Explain the extent to which you consider that ethics can and should play a role in the print media, and what you consider 'ethics' to mean in this context.**
- 28** Under my editorship, I think ethics have played a strong role and hugely influence my decision-making.
- 29** As Editor I have always been determined to foster a culture of honesty, integrity and high ethical standards at the Sun. Like me, all the journalists use the PCC Code as their starting point in any debate over editorial ethics and behaviour. Our experience over many years in dealing with dilemmas in newsgathering and publication of controversial material has built a wealth of informal precedent which we can draw on when we make decisions. That decision-making process often involves my most senior editors, the Managing Editor and the in-house lawyers. Staff at a mass market tabloid newspaper like the Sun are constantly having to balance the public interest against an individual's right to a private life. Please refer to my answer to question 18 for further discussion of this point.
- 30** There are boundaries and many examples of occasions when stories have not been run for ethical reasons despite their potential editorial and commercial value. Much private information is often excluded from publication as is certain detail and pictures in sexual,

murder and suicide cases. There are also numerous examples of information regarding military operations being left out which we felt might endanger the lives of forces personnel or the public.

- 31** I have chosen not to run details of high-profile first trimester pregnancies on a number of occasions despite their obvious commercial appeal. In January last year, The Sun learned that X-Factor host, Dannii Minogue, was pregnant. After discussions with the singer's representatives, we learned that she had not yet had her 12 week scan. We did not therefore run the story, although another paper did. Last month, I declined the wedding photographs of a newly-married shark attack victim because of the associated sensitivities.
- 32** Similarly, we agreed not to publish a story of a gay man being held in custody in Saudi Arabia after discussions with the Foreign Office. Details of a well-known TV actress's battle with depression weren't published after discussion with her agent; the celebrity later sold her story to another newspaper.
- 33** The Sun is a powerful force for good. It has a strong moral compass and I am proud to be its Editor. There are many examples of how Britain's best-selling newspaper uses its popularity to inform and improve the lot of ordinary people.
- (i) The Sun was the first media organisation to launch a wholehearted campaign to support the Help for Heroes charity campaign in 2007. By May 2011 the charity announced it had raised over £100m to help injured service personnel providing direct, practical support. An example of The Sun's work on this campaign is attached to this statement behind tab (b) of exhibit DJM1.
  - (ii) In 2008 the Sun launched "The Millies", an annual award scheme to honour excellence and bravery in the armed forces at a time when many of those making sacrifices in faraway war zones were suffering from public neglect. The awards night is attended by members of the royal family and is televised in a primetime programme attracting over 5m viewers. An example of The Sun's work on this campaign is attached to this statement behind tab (c) of exhibit DJM1.
  - (iii) In 2009 when the jobless total exceeded 2.5m, The Sun launched a dedicated weekly section called Sunemployment for readers seeking work. In May this year the Sunemployment roadshow visited Newcastle, Manchester, Birmingham, Cardiff and Hastings. Thousands of people attended the Q&A sessions with business leaders, recruitment experts and major employers in each region. Since the campaign first launched over 50,000 people have been found work or training through it and it has received the backing of the Chancellor of the Exchequer. Examples of The Sun's work on this campaign are attached to this statement behind tab (d) of exhibit DJM1.

- (iv) During our recent education week campaign, The Sun launched a website "Hold ye Front Page", which tells the great stories of 2,000 years of history and scientific breakthrough as if they were Sun front pages. The idea has already produced a bestselling book which was celebrated at the time by Tony Blair, the former prime minister, as an excellent teaching aid. Examples of The Sun's work on this campaign are attached to this statement behind tab (e) of exhibit DJM1.
- (v) After the death of the singer Amy Winehouse earlier this year, the Sun joined in a partnership with her father to launch a drug awareness campaign. Examples of The Sun's work on this campaign are attached to this statement behind tab (f) of exhibit DJM1.
- (vi) Last year the Sun's Haiti charity single, masterminded by the music mogul Simon Cowell, raised more than £1m for disaster relief. Examples of The Sun's work on this campaign are attached to this statement behind tab (g) of exhibit DJM1.
- 34** I believe it is this unique combination of material that makes The Sun Britain's best-selling newspaper. That said, publishing a daily newspaper for eight million readers each day where thousands of articles are published each week means that we work in a fast-moving environment where decisions have to be made quickly. Mistakes can be made. If they are, then I endeavour to correct them as swiftly as possible and for myself and my executive team to learn from them. \*
- (9)** Explain the extent to which you, as an editor, felt any financial and/or commercial pressure from the proprietors of your newspaper, or anyone else, and whether any such pressure affected any of the decisions you made as editor.
- 35** Clearly the newspaper business is a highly pressurised one with intense competition and I am expected to produce a lively and entertaining newspaper with interesting and exclusive content. I have never, however, felt under inappropriate pressure in that context.
- (10)** Explain the extent to which you, as an editor, had a financial incentive to print exclusive stories.
- 36** The Sun sells almost three million copies and has nearly eight million readers a day. Some exclusive stories help drive circulation and I am paid a fair salary and bonus to produce an entertaining and successful newspaper.
- (11)** Explain whether, to the best of your knowledge, your newspaper used, paid or had any connection with private investigators in order to source stories or information and/or paid or received payments in kind for such information from the police, public officials, mobile phone companies or others with access to the same: If so,

**please provide details of the numbers of occasions on which such investigators or other external providers of information were used and of the amounts paid to them.**

- 37** The Sun has used private investigators in the past to assist journalists on stories, but I am not aware of any private investigators being commissioned under my editorship. I understand that our payment system is currently being reviewed to provide the Inquiry with information requested concerning payments made to private investigators from 2005 onwards.
- 38** The Sun does, however, regularly use news agencies and search agents to trace the addresses and telephone numbers of people we would like to contact in connection with stories. They are typically desk-based individuals or agencies who source addresses and other information from publicly available databases (for example, historical electoral rolls, Companies House records, Land Registry records and legitimate telemarketers' telephone lists).
- 39** It typically costs between £50 and £300 to obtain an address for an individual from such an agency. Last year, The Sun paid approximately £165,000 in fees to a small number of such agents.
- 40** To the best of my knowledge, The Sun has never knowingly paid or made payments in kind to police, public officials or mobile phone companies for information.
- (12) What was your role in instructing, paying or having any other contact with such private investigators and/or other external providers of information?**
- 41** As a reporter and Showbiz Editor, I regularly instructed and paid tipsters, freelancers, news agencies and, on a few occasions, search agents.
- (13) If such investigators or other external providers of information were used, what policy/protocol, if any, was used to facilitate the use of such investigators or other external providers of information (for example, in relation to how they were identified, how they were chosen, how they were paid, their remit, how they were told to check sources, what methods they were told to or permitted to employ in order to obtain the information and so on)?**
- 42** I do not believe there is any specific protocol that governs the hiring of private investigators, search agents or other external providers of information, other than the new requirement for the CEO's authorisation in relation to private investigators. As in our dealings with any news agency, company or freelance journalist, there is a general expectation that all external providers will fulfil their obligations legally and ethically. The paper generally uses search agents that we trust on the basis of experience.

- (14) **If there was such a policy/protocol, explain whether it was followed, and if not, what practice was followed in respect of all these matters.**
- 43 See my answer above.
- (15) **Explain whether there are any situations in which neither the existing protocol/policy nor the practice were followed and, what precisely happened/failed to happen in those situations. What factors were in play in deciding to depart from the protocol or practice?**
- 44 See my answer above.
- (16) **Explain the extent to which you are aware of protocols or policies operating at your newspaper in relation to expenses or remuneration paid to other external sources of information (whether actually commissioned by your newspaper or not).**
- 45 The majority of payments made to external suppliers are through the Editorial Commissioning System ("ECS"). This is used to pay individuals, news and picture agencies using a self-billing system in which an invoice is not needed to generate payment. The payment is requested by the journalist and signed off by the relevant desk head before being submitted to the Managing Editor's office for approval. The payment is then made electronically direct to the recipient's bank account.
- 46 Cash payments to sources are also made through the ECS. Under the new payments policy introduced in September 2011, cash payments must now be logged and signed off in sequence by the head of department, the Editor or Deputy Editor, the Managing Editor or Deputy Managing Editor and then the journalist who requested it. Prior to September 2011, there was a similar signing procedure but one which ended with anyone from the relevant desk collecting the cash. With the new system, the journalist who first requested the money must sign a book and a disclaimer outlining that they have had training in the Bribery Act and will follow NI company guidelines on the use of the cash.
- 47 Non-contributor payments, for example, studio fees and model agency costs are made through the Common Approval System ("CAS"). This is a conventional accounts payable accounting system, in which the supplier is paid on receipt of an invoice.
- (17) **Explain the practice of your newspaper in relation to payment of expenses and/or remuneration paid to other external sources of information (whether actually commissioned by your newspaper or not).**
- 48 Please refer to my answer to question 16.
- (18) **In respect of editorial decisions you have made to publish stories, explain the**

**factors you have taken into account in balancing the private interests of individuals (including the fact that information may have been obtained from paid sources in the circumstances outlined under question 11 above) against the public interest in a free press. You should provide a number of examples of these, and explain how you have interpreted and applied the foregoing public interest.**

- 49** The PCC Code specifies that everyone is entitled to respect for his or her private and family life, home, health and correspondence, including digital communication. Editors are always expected to justify intrusions into someone's private life without their consent. We often talk to the PCC pre-publication and listen to their advice before deciding whether to publish or not. Like other popular newspapers we can be controversial and do reveal information about individuals in the public eye, celebrities and sports stars. I often decide to leave out certain private details but, if they are a public figure, publication is balanced against the individual's previous public disclosures of information and their responsibilities. For instance, I believe that a sportsman who trades on a family image to secure sponsorship and commercial deals has a responsibility to behave in a certain way. Therefore it may be justifiable to expose that individual for indiscretions or lapses in their behaviour.
- 50** But the public interest is extremely difficult to define and has to be assessed on a story-by-story basis. It is a grey area, involving a balancing exercise and I believe we get it right more often than we get it wrong.
- 51** As referred to in my answer to question 8, there have been a number of examples when I have chosen not to publish details about sensitive operational military information, details of individuals' pregnancies and health for ethical reasons. We will also routinely leave out details and pictures of high-profile individuals' homes, car number plates and family members.
- 52** Last month, The Sun exposed an individual who was a senior member of the British National Party. The Sun's reporter posed as a sympathiser to infiltrate a group who had travelled to a Nazi event in Hungary. The subject was spotted and photographed performing a Hitler salute. This photograph, together with the story, was published in the paper and online and the individual in question subsequently lost his job. We published this story because I believe there is a clear public interest defence in exposing the sinister side of a member of an organisation, which is trying to appeal to voters as a moderate and credible political party. A copy of our front page on this story is attached to this statement behind tab (h) of exhibit DJM1.
- 53** In May this year, The Sun revealed how the captain of the Doncaster rugby league team successfully bet on his own team's defeat. The investigation showed how matches are

fixed; how the Doncaster captain bet his team would lose in a Challenge Cup match by 38 points; how a top rugby league official persuaded him to try and lose a game and how players pull tricks to swing a match. The Doncaster captain was fined and banned for 18 months by the sport's governing body. It was a traditional investigation in the public interest exposing wrongdoing in a sport popular among our readers. A copy of our front page on this story is attached to this statement behind tab (i) of exhibit DJM1.

**54** The Sun has also exposed a court clerk who was allegedly offering to wipe dangerous drivers' convictions for financial gain. The Magistrates Court worker allegedly boasted that he could clean licences for £500 cash. When we handed our information over to police they asked if we could hold off from publication for 24 hours to help their investigation. I agreed and the detective in the case thanked us for our patience and the way we handled the case. A man was later charged with taking a bribe, misconduct in a public office and perverting the course of justice and faces trial. I believe there was a clear public interest in exposing this criminality. A copy of the story we ran on this is attached to this statement behind tab (j) of exhibit DJM1.

**55** Publishing in the public interest deserves to be considered in a wider context than the judgement of individual stories. It is in the public interest that a mass market of readers is educated in the significant issues of the day so that the country can exist as a functioning democracy. The Sun does this by mixing informative articles with entertainment in such a popular way that it sells 3m copies a day on a Saturday (according to ABC figures) and commands a readership of 7.8m (according to an NRS survey). In the past year 19m people in the UK have read a copy of The Sun, which amounts to 38% of the adult population. Each year 22.5m UK adults have some form of interaction with The Sun either in print or online.

**56** To put this in context, the day after Michael Jackson's death, The Sun's circulation increased by more than 325,000 copies - more than the combined total paid-for circulation of The Guardian and The Independent on any given day.

**57** Millions of ordinary working people do not turn to The Financial Times or The Times to learn, for example, about the latest attempt to solve the Greek debt crisis. They discover it in The Sun. A double page spread on July 22 headlined "I Owe Ouzo" described the background to the £100bn Eurozone bailout agreed at an emergency summit in Brussels. It was accompanied by a graphic detailing the debt, unemployment rates and relative financial toxicity of 18 European countries. It was popular, informative, educational journalism at its best, addressing the most important political issue of the year. On the next page there was an article about how Lady GaGa's father hired a stripper to teach her piano as a child. By creating a unique chemistry of stories every day The Sun educates,

entertains and surprises its mass audience.

58 Similarly, on September 30 2011, The Sun's exclusive front page story concerned the Manchester United goalkeeper David de Gea being caught shoplifting a doughnut from a Tesco store. This article went around the world and ignited discussion and debate on radio, TV and social media. Inside the paper that day, we launched our new Hold Ye Front Page educational website which I referred to above.

59 The Sun's unique mix of popular journalism gives millions of people a sense of their own place in the nation's public life. It can make our readers smile and gives a voice to their passions and prejudices. Our readers may be prompted to buy The Sun to read the splash story about the affair the Manchester United footballer Ryan Giggs conducted with his brother's wife. But they will also discover more serious elements inside. For example, The Sun mounted a "Shackle Britain" campaign when Tony Blair refused a referendum on the new EU Constitution; thousands of booklets "translating Eurospeak into Sunspeak" were distributed in the UK and Brussels in the best traditions of Thomas Paine, the 18th century pamphleteer. An example of the Sun's work on this campaign is attached to this statement behind tab (k) of exhibit DJM1.

60 Put simply, The Sun connects with the values, broad interests and obsessions of millions of ordinary working men and women every day and in doing so it serves a proper purpose in our democracy. It distils complex important issues of the day, including politics, finance and law into concise readable copy which educates and entertains. Publishing popular newspapers is not a public service but the publication of commercially successful titles like The Sun is, I believe, in itself in the public interest.

(19) Explain whether you or your newspaper (to the best of your knowledge) ever used or commissioned anyone who used 'computer hacking' in order to source stories, or for any reason.

61 To be the best of my knowledge, computer hacking has never been used to source stories on The Sun.

I believe that the facts stated in this witness statement are true.

Sign 

Dated: 14/10/11