

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

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**WITNESS STATEMENT OF ANDY COULSON**

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I have tried in this statement to cover all the questions raised by the Inquiry and to avoid claiming any right not to answer. There may be areas of questioning where my lawyers will advise me that I should not answer questions. I am not a lawyer and I may not be able to assess for myself what my rights and obligations may be. I would like to take legal advice if the Inquiry wishes to explore issues that I have not dealt with in this statement.

I set out below my response to the questions posed by the Inquiry.

**Brief career history**

1. My name is Andrew Edward Coulson. I am a former journalist and political adviser.
2. From 1989 I was a reporter on The Sun. From 1994, after a brief spell on the Daily Mail, I edited The Sun's Bizarre showbusiness column and from January 1998 until August 1999 I was Associate Editor. From August 1999 until May 2000 I was Editorial Director of News Network and then became Deputy Editor of the News of the World. From January 2003 until January 2007 I was the Editor of the News of the World.
3. From July 2007 until May 2010 I was the Conservative Party's Director of Communications and Planning. I was Downing Street Director of Communications from 12 May 2010 until January 2011.
4. I am now a freelance consultant.

### Employment practices at the News of the World

5. Editing the News of the World required a degree of focus and energy. However, I worked hard to be fair and even-handed with the paper's staff and believe this would be supported by the vast majority of people who have worked for me over the years, both in journalism and in politics.
  
6. I am not a bully. It is a matter of enormous regret to me that I was not given the opportunity to give evidence at Matt Driscoll's employment tribunal hearing. I feel that I have been tried and judged in my absence. The disciplinary proceedings which led directly to the termination of Matt Driscoll's employment commenced in March 2007, after I had resigned from the News of the World. He also launched his employment claim after my resignation. I was not asked by either side, or by the Tribunal, to give evidence about any of the circumstances of his employment. If I had been asked whether there was a culture of bullying on the paper, or if Mr Driscoll had been subject to disability discrimination, I would have denied it. I would also have been able to put into context various emails and other documents and explain the circumstances involving me which I believe the Tribunal misunderstood in its findings of fact.
  
7. At paragraph 195 of its judgment, the Tribunal (while discussing the reason for the dismissal) described me as the "*original source of the hostility*" towards Matt Driscoll, and went on to find that other managers took my lead both before and after my own resignation. The Tribunal went on to observe; "*Mr Coulson did not attend the Tribunal to explain why he wanted the Claimant dismissed*". I am perplexed by this observation, especially the implicit criticism that it was within my gift to attend the Tribunal to give my own version of events, and that I simply chose not to do so. I was not named as an individual respondent to the claim (I understand that I could have been named had Mr Driscoll wanted). I was not called as a witness by either party. In fact, I have been advised that the Employment Tribunal had the power to issue a witness order compelling my attendance, and to issue it of its own motion. Given the allegedly central role that I was said to have played in the adverse treatment of Mr Driscoll, it seems surprising that the Tribunal did not exercise that power. It is even more surprising that I have been criticised for not attending when I had no opportunity to do so.

8. I have asked News International to provide me with evidence and other information from the unfair dismissal case which would help with my recollection but they have declined to do so. Therefore, I cannot comment on the evidence other than that reported in the Tribunal's Judgment. I have also asked this Inquiry for the contemporaneous letters and emails to which reference is made in the Tribunal's Judgment but have been informed you do not have them. I am therefore only able to make the following observations based on my recollection and a reading of the Judgment of 17 December 2008.
9. It is clear to me that a number of errors are contained within the Tribunal's finding of facts which have now found their way into these proceedings as if they are true. I doubt that the Tribunal would have made those findings if I had given evidence, although I fully understand that there is no guarantee that the Tribunal would have accepted my version of events or my explanations.
10. The whole Tribunal Judgment seems to proceed on the assumption that I always wanted to dismiss Matt Driscoll. This is simply wrong. The Tribunal attributes to me the expression that I wanted to 'get shot of' Matt Driscoll (paragraph 107). These words were not mine: they were contained in Stuart Kuttner's email to me of 9 November 2005, and were themselves a report of words apparently used by Mike Dunn (paragraph 104).
11. One of the most obvious gaps in the Tribunal's reasoning concerns why I am said to have wanted to dismiss Mr Driscoll. The only possible reference I can find for the source of my alleged hostility towards him is the finding that I held a grudge against him for failing to confirm a tip I gave to Mike Dunn about the colour of Arsenal shirts in 2004 (paragraph 89). The Tribunal's conclusion makes no sense. Tips often failed to be confirmed or we were beaten to the story by the dailies. If I had held a grudge against every reporter who failed to confirm a tip, many people other than Matt Driscoll would have been complaining about me. Further, it is not as if this was an important story. The changing of the colour of Arsenal's home strip for one season is a fairly trivial sports news item. It pales into insignificance next to, say, an exclusive on the identity of the next England football manager. Contrary to the Tribunal's view that Matt Driscoll's fate was sealed in 2004, it was not. Matt Driscoll was not disciplined for failing to corroborate the tip.
12. Matt Driscoll was not the subject of disciplinary proceedings until the summer of 2005. At that point he was issued with a warning because he had been unable to support quotes he attributed to the footballer Kolo Toure. Arsenal complained to the PCC that the Toure article

he had written was inaccurate. I was not intimately involved with that disciplinary process but I see that the Tribunal seems to have found that the significant proportion of the reason for the disciplinary action was the delay in dealing with Arsenal's complaint (paragraphs 99 to 103 of the Judgment). Of course, I would not condone any delay in dealing with an external complaint, and it may well be true that questions should have been asked of Mike Dunn in relation to his own responsibility for the lateness of the reply to Arsenal. I am clear, however, that on the scale of journalists' misdemeanours, reacting slowly to a complaint is far less serious than being unable to support a quote. From my involvement at the time, I remember being concerned only with that aspect of Mr Driscoll's conduct i.e. the inaccuracies in the article. Inaccuracies in published material may lead to complaints to the PCC (as this case did), to litigation and to substantial loss of credibility.

13. I have not seen the letter of 10 November 2005 that Matt Driscoll wrote to Mike Dunn and which was copied to me. I only have access to the précis of it cited in the Judgment and the extract from my response. Nor have I been able to see Matt Driscoll's notes or tape transcript of the Toure interview. What I do remember is that Mike Dunn felt that the transcripts and later notes provided by Matt Driscoll did not suffice and I was minded to trust his judgment. I would say that Mike Dunn was an executive who was instinctively protective of his staff and certainly not a man to make unwarranted attacks.
14. I vaguely remember being irritated by the content of Matt Driscoll's letter of 10 November 2005 and I believe that is what prompted my response which I accept was intemperate. I don't accept that it equated to bullying. It appears Matt Driscoll wrote to me in terms which made it clear that he did not accept that he had done anything wrong. I would have disagreed with his underlying sentiment, and I also didn't appreciate him writing to me to profess his innocence whilst declining to submit an appeal. My response was accurate: I did take a more serious view of his conduct than Mike Dunn did; I did not agree that Matt Driscoll had done nothing wrong; his future performance would be monitored closely; and any repeat of his failings would lead to further disciplinary action. I appreciate that it could legitimately be said that I was not as supportive as another manager might have been, but that is a long way from bullying.
15. The Tribunal refers to an email that Mike Dunn sent to Matt Driscoll a few weeks later, on 6 December 2005 (Judgment paragraph 108) when he wrote to Matt Driscoll as follows 'I meant it when I said let's start afresh and get on with the job and I have noted that is exactly what you have done'. This demonstrates to me that Matt Driscoll and Mike Dunn had wiped the

slate clean and they were starting as they meant to go on. The air had been cleared and there was no conspiracy to get rid of Matt Driscoll at that stage or indeed later.

16. Much is made of an email of mine of 19 July 2006 which is quoted partially by the Tribunal in the findings of fact - 'want him out as quickly and cheaply as possible'.
17. This was sent after a second incident involving a complaint by Charlton Athletic about another article written by Matt Driscoll, which was made on 22 March 2006. Three weeks later, on 12 April, Matt Driscoll initiated a discussion with Mike Dunn about negotiating severance terms. The severance negotiations were conducted in parallel with the second set of disciplinary proceedings and I note they were still ongoing when I myself left the News of the World in early 2007. Although the Tribunal uses my July 2006 email to justify the theory that the disciplinary proceedings were a pretext to terminate Matt Driscoll as an employee, this is not the case. Although I cannot recall all the detail now, I believe that, with Matt Driscoll being signed off, and already having initiated severance discussions, I decided that we should try to conclude the terms of a severance agreement '... as quickly and cheaply as possible'. Where an employee has indicated that he wishes to leave by initiating discussions about severance, and where his recent performance suggests that he is no longer operating at the level at which he used to operate, it seems to me to be sensible to suggest that the discussions are concluded as swiftly and as inexpensively as possible.
18. I do not believe I was aware that calls were made to Matt Driscoll as described in the findings of fact. I would not normally get involved in that level of detail for day to day management of individual employees. I have no recollection of how Matt Driscoll was treated by News International when he was signed off as unfit for work. Based on the limited evidence I have been able to view I would agree it seems inappropriate for him to have been contacted as often as he was whilst ill. This process would have been led by HR and the company's doctors and I would have expected everything to be handled properly and appropriately. I'd like to add that, given my only partial view of the full facts and background, I am not casting judgment on those individuals who were involved.
19. I was completely taken aback when I heard the Tribunal's finding in relation to my role and wished I had been asked to participate. It prompted a torrent of publicity in which I was repeatedly branded a bully. I have already commented on the fact I do not accept there was a culture of bullying under my editorship.

20. Quite apart from my own views of whether there was bullying at the News of the World, the Tribunal's decision does not seem internally consistent. At paragraph 128, the Tribunal refers to there having been a "*consistent pattern of bullying behaviour*" between mid-2005 and mid-2006. The only incidents of alleged bullying behaviour were the disciplinary proceedings. Even if these could be said to amount to a "*consistent pattern*" (which I don't agree with), the finding that these disciplinary proceedings were "*unjustified*" (paragraph 121) is astonishing. The disciplinary proceedings followed from complaints being made by two football clubs about serious inaccuracies in Matt Driscoll's reporting. Accuracy in reporting is of critical importance, and Mr Driscoll failed to report accurately. That he was subjected to a disciplinary process was justified and not an act of bullying.
21. I was also surprised by the size of the pay-out to Matt Driscoll. After the 7/7 bombings in 2005, the News of the World campaigned for an increase in the compensation pay-outs for victims. That Matt Driscoll received considerably more than the amount that had been paid to someone seriously injured in those attacks was a source of some surprise to me.
22. The evidence of Matt Driscoll's union representative, Steve Turner, cites other instances of alleged bullying. I do not know the extent to which these cases were said to overlap with my tenure as editor. I do not know who Mr Turner was referring to, and cannot comment on his evidence other than to deny it. I did not oversee a culture of bullying at News of the World under my editorship. I was very keen to build up an esprit de corps. I believe that the vast majority of people who worked with and for me in journalism and in politics would agree that I was not a bully.
23. I dispute Ian Edmondson's evidence to the Inquiry about bullying, as well as that given by the NUJ on behalf of some of its members. Tabloid journalists work in a highly competitive environment and there is pressure to deliver stories, but I did not bully people to achieve results.
24. I had left the News of the World when the Tribunal's decision was announced in 2008 and so was not involved with any systems and procedures that might have been implemented as a result.
25. I have no recollection of any other bullying allegations that were made during my time as editor. I tried to check this recollection is correct by asking News International but they were not willing to assist me.

**News International severance package**

26. When I left the News of the World in January 2007 I agreed a severance package with Les Hinton. The terms are contained in the attached Compromise Agreement exhibited as AEC/1.
27. Since leaving the News of the World I have received no benefits from News International in addition to those within the Compromise Agreement. My lawyers have been paid some fees under the costs indemnity set out in paragraph 4.6 of the agreement. At News International's instigation, it had been agreed before I left that the termination payments would be paid in tranches. The News International BUPA health cover for me and my family continued for three years under the terms of the agreement and, also, a number of News Corp Restricted Stock Units ('RSUs'), awarded to me before I resigned, vested in August 2007.

**My appointment as Director of Communications for the Conservative Party**

28. I do not have a copy of my contract with the Conservative Party for the position of Director of Communications and Planning which I took up in May 2007. I believe it is with the police and I have asked for a copy.
29. The first approach from the Conservatives came from George Osborne, I believe in March 2007. He contacted me and we met at a London hotel for a drink. In that conversation he told me that the Conservative Party wanted to make changes to its professional operation and asked whether I would be interested in joining the team. Having never considered a career in politics I was initially reluctant, but became more intrigued as the conversation went on. I believe David Cameron called me later that night to say that Mr Osborne had told him of our conversation and that he would like to meet. We did so, at some point soon after, at his parliamentary office in the Normal Shaw South building and we had a discussion about the job.
30. Discussions then stalled during the local election period. Towards the end of May 2007 they were re-started and after further conversations with Mr Cameron, then Party Chairman Francis Maude, Chief of Staff Ed Llewellyn and Steve Hilton I was offered the job of Director of Communications and Planning.

31. The hiring process was completed in a phone conversation with Mr Cameron whilst I was on holiday in Cornwall. During that conversation I believe he told me that background security checks had been made. He also asked me about the Clive Goodman case. Shortly after this conversation my appointment was announced and a start date agreed of July 9. At no point during these discussions was my severance package with News International discussed.
32. During the process of negotiation with the Conservative Party I had no contact with Rupert Murdoch, James Murdoch or Les Hinton. At some point I told Rebekah Brooks and other close friends that I was in discussion with the Conservatives, and later that I had decided to take the job. I don't recall any conversations at all that might have had a bearing on Rebekah making representations about my role or how my appointment might give an advantage to News International.

#### **Previous relations with senior Conservatives**

33. During my time at the News of the World I had dealings with senior politicians from both Labour and the Conservatives. I met with David Cameron on a few occasions, the first time, before he stood for the party leadership in 2005. I met him briefly for a coffee with his press officer at a London hotel. I next met him at the Conservative conference in Blackpool in October 2005 at a dinner hosted by Les Hinton. After he became Leader I met him, again for coffee, at the party's conference in Bournemouth a year later. We also had lunch in London with the News of the World political editor. I believe I also attended a breakfast with Mr Cameron hosted by Rupert Murdoch in London along with all other News International editors in June 2006.
34. The agenda for all these meetings was essentially the same: a broad conversation about British politics, foreign affairs and the major issues of the day. At no point in any of these conversations was the potential support of the News of the World (or the other News International titles) discussed and nor indeed were any commercial issues.
35. During my years at News International I attended a number of political meetings, lunches and dinners with politicians from both Labour and the Conservatives. At no point in those meetings did I ever instigate, witness or take part in a conversation involving News International's commercial business aims.

36. I remember several meetings with Tony Blair. I also met Gordon Brown alone in his office at the Treasury and again for breakfast with other News of the World executives. I also met him alone in his hotel suite at Labour conference in Manchester in 2006. I remember that meeting well because Mr Brown told me that he had it 'on very good authority' that Rupert Murdoch would appoint me as Editor of The Sun when Rebekah was promoted. I believe he said this to impress on me his closeness to Rupert Murdoch but I took his comments with a large pinch of salt.
37. Before our job discussion in 2007 I met with Mr Osborne on a few occasions. We met for a drink at the Blackpool conference in 2005 and for coffee in his suite at the Bournemouth conference a year later. On both occasions I brought along a number of my executives and the conversation was about the Conservative Party's plans. At some point before I left the News of the World, Mr Osborne also attended a lunch at News International hosted by me and attended by a handful of my executives. He had stepped in for Mr Cameron who had cancelled at short notice.
38. My only other dealings with Mr Osborne were in relation to a story the News of the World published in October 2005. At some point in the days before publication, I contacted Mr Osborne to say that my news desk had a story about him. I wanted to give him a full opportunity to respond. Mr Osborne told me that he would be providing a statement via the party's press office. He then did so on the day of publication. The same statement was given to The Sunday Mirror. It has been suggested that, with magical foresight on my part, I went easy on Mr Osborne in the hope of getting a job 15 months later. I would point out two things: first, I had no idea that I would leave the paper at this point and I had no intention of working in politics; second, I published the story with the headline TOP TORY, COKE AND THE HOOKER across six columns of the front page of the biggest selling Sunday newspaper (I attach a copy of the article as AEC/2). It is, I think, fair to say that I did not go easy on Mr Osborne and that he would not have considered that week's paper to be career enhancing.
39. Before starting work with the Conservatives, the politician I worked with most closely was William Hague. I had met him a few times for coffee in the years before I became editor, with other executives. When I became editor I decided to approach him with the offer of a weekly column. He wrote his first column for us in, I believe, December 2003. We would speak most weeks to discuss the column which he would file on a Friday evening or Saturday morning. During this time we would meet occasionally for a drink or a meal to discuss his column and politics more generally. These meetings took place in London and at party

conference. When Mr Hague decided to return to frontline politics as Shadow Foreign Secretary in 2005 he, sadly for the paper, gave up the column.

40. During my time as editor I met with a number of other Conservative politicians including Dr Liam Fox, David Davis, Oliver Letwin, Alan Duncan and Michael Howard. These meetings mostly took place in the run-up to the 2005 election. I, for a time, considered endorsing the Conservatives in that election. I was keen to meet and hear the views of Michael Howard's Shadow Cabinet members. The same meetings took place with their counterparts in the Labour Party at their conference. In the end, I decided to continue the paper's support of Tony Blair.
41. I also attended Rupert Murdoch's annual summer drinks parties at which a large number of Government and Opposition politicians and advisers were usually present.
42. Whilst my News International background may have been considered useful by the Conservatives when considering me for the post, it was not specifically discussed as being an advantage. Colin Myler had replaced me as editor and we were not especially close. I also understood his politics to be more sympathetic to Labour than the Conservatives. I told David Cameron, in one of our first discussions, that he should not expect an easy ride from the paper. Mr Cameron knew Rebekah Brooks and I were friends, but again I made clear, and he understood, that this did not mean that The Sun would endorse us. I believe both of these warnings were confirmed by the mixed coverage we received in News International papers in the years ahead. I believe I was employed for my communication skills and experience and for my ability to motivate and manage a team. Over time, I also became one of a group of people Mr Cameron and others would look to for clear communications and political advice.
43. As far as I was concerned there was no conflict of interest in my taking the job with the Conservative Party and I did not see it, nor was it identified by anyone else, as providing the potential for any conflicts of interest.
44. However, since resigning from my role as Downing Street Communications Director I have given thought to one issue which I now accept could have raised the potential for conflict.
45. In 2006 I was awarded News Corp stock along with other company executives. As referred to above, there was also further stock to come to me in 2007 which was included in the Compromise Agreement. I had sold other shares awarded to me during my years at News

International both before and immediately after my resignation. I have held the RSUs from the day they were awarded until now. I never really focussed on their significance.

46. Whilst I didn't consider my holding of this stock to represent any kind of conflict of interest, in retrospect I wish I had paid more attention to it. I was never asked about any share or stock holdings and because I knew that I wasn't involved in any commercial issues, including the BSkyB bid, it never occurred to me that there could be a conflict of interest.
47. The bid for BSkyB by News Corp was not something in which I was involved in any way, shape or form. I have no recollection of dealing with any communications issues arising from it, save for the Daily Telegraph revelations about Vince Cable. That incident required my involvement in the media handling of what was a political, not a commercial, issue.

#### **Vetting and clearance procedures**

48. Aside from the security checks made immediately before I worked for the party, I am not aware of any other vetting procedures during the party's time in opposition. On arrival at Downing Street I didn't ask at what level my security was set and assumed I would be assigned whatever level was appropriate. My recollection is that it only became an issue on one occasion following the Midlands airport security incident in the autumn of 2010. I believe there was a concern that the communications around that issue were flawed and that I should have been in a particular meeting where they had been discussed. I assumed from that point that a more serious level of vetting might be required and would get underway. I don't know for certain if the new level of vetting was activated or what stage that process was at when I left. I didn't see it as my job to either chase this or to ask questions about it. I assumed there were very clear official procedures and they would be followed.
49. I should say that I never asked for special access and did not ask for special authority over the civil service. I went to the meetings I was invited to and got on with my job.

#### **Director of Communications and Planning in opposition and Director of Communications in Downing Street**

50. In the opposition role I oversaw all of the party's communications departments including press, broadcast and online. I had a specific role overseeing all of the communications for the

Leader of the Opposition and his Shadow Cabinet. I was also one of a small group of people with responsibility for the strategic planning and execution of the General Election campaign.

51. In opposition there is a clear main strategic objective which is to get into government. For most of our time in opposition the timing of the election was uncertain, so planning was not straightforward. One of my main operational priorities was to organise and motivate a professional media team able to deal with the day to day pressures of opposition but also to ensure we handled the media in a way that would lay the ground for government.
52. In opposition your 'machine' is under constant analysis from the media and I was keen to prove that in that regard we were ready for government. I would like to think that the media, broadcast and print, would agree that the Conservative press office handled them all professionally and properly. Day to day, I would attend David Cameron's morning and afternoon meetings, along with other key staff, and would be part of the general planning team.
53. I would be invited to join a whole range of other meetings on a whole range of issues where my input on communications was required. I got involved in policy only in relation to its likely impact on the media. I would be asked my view on certain policies and would give it, but my role did not involve formulating or deciding policy. My job was to make sure policy was properly communicated.
54. The methods of delivery in my role involved all areas of media. David Cameron would give speeches, press conferences, provide interviews, write articles and use the Conservatives' own website to communicate his policies and views.
55. Mr Cameron and I shared a strong view that broadcast media played an increasingly important role in politics. The evening news in particular, we felt, provided a crucial opportunity for us to deliver his and the party's message directly into people's homes. Over time it became clear that TV would play a dominant part, more than ever before, in the General Election. As a result I would say, on balance, we put more energy towards broadcast than print. This was best demonstrated by the decision to push hard for TV debates.
56. David Cameron felt strongly about, and enjoyed, public meetings. At his suggestion we organised an unprecedented campaign of 'Cameron Direct' meetings where he would take

unscripted questions from the public. Some of these meetings were covered by the media, most were not.

57. Another aspect of my job was to monitor broadcast coverage, in particular the BBC, given its audience dominance. My approach was to keep as many lines of communication as possible open with the BBC, and to argue our case. I never took the view that ranting at producers and editors was either proper or productive. But I would monitor the BBC's coverage, including online, and firmly register our view when I thought it was appropriate.
58. Over time I developed a close relationship with David Cameron. He is a hard-working and inspirational boss, leader and a thoroughly decent, moral man. Although his communications were my priority, I also developed a good relationship with his Shadow Cabinet and (later) Cabinet colleagues. I made myself available for advice 24 hours a day and worked hard to make sure their communications were properly handled and that they were dealt a fair hand by the media.
59. I would also play a central part in what could be described as 'crisis management'. In modern politics media storms frequently erupt, often out of no-where. On those occasions I was one of a team of people who would help formulate and communicate the party's and/or the Leader's response. In opposition there was no more time consuming crisis than the expenses scandal. This crisis management aspect of my job continued in Government where I advised both Conservative and Lib Dem Cabinet members.
60. I led a talented team of press officers and other staff who worked on the Party's events, advertising campaigns and online activities. I encouraged a strong team spirit, made sure they were properly supported and ensured that their considerable efforts were properly recognised and rewarded. In terms of engagement with the media I was clear that all staff should be professional and honest in their dealings at all times.
61. I was appointed as Director of Communications and Planning and the exact terms and conditions are in the contract, a copy of which I am not currently able to provide but have requested. When I entered government my contract with the Conservative Party was terminated and I was paid a lump sum. This arrangement was cleared by the civil service.
62. After the election, I oversaw all government communications but with a particular focus on No10. I had overall responsibility for the Prime Minister's communications but also worked

with the various Whitehall departments with the aim of co-ordinating all communications. I worked alongside the civil service communications departments but did not have direct management responsibility or authority over them.

63. I was also tasked with integrating with the Lib Dem communications team, making Jonny Oates and later Lena Pietsch my deputy. Other members of the Lib Dem team were also integrated into the No10 Comms set-up.

64. I worked with the Conservative and Lib Dem communications Special Advisers brought into No10 by the Prime Minister. They included Gabby Bertin, the PM's Political Press Secretary and for a time Henry Macrory the Head of Political Press. I also worked with the special advisers within the various government departments. Although we worked closely together there was a clear line drawn between the civil servants and the special advisers. Part of my job was to make sure that the entire team worked well together but never at the expense of the civil servants' clear party political neutrality. This was an important distinction and one which the political team within No10 respected.

65. I was very clear that just as the PM wanted his Cabinet members to have more autonomy, so should their communication departments. I was there to help when problems arose, which they did from time to time, to organise and execute the over-arching plan and to ensure that the messages were neither mixed nor badly co-ordinated. This was one of the most challenging aspects of the job in government.

66. In government my day was structured around a series of regular meetings:

7.30 am: Conference call to catch-up on press and morning broadcast headlines.

8.00 am: Chair communications meeting where the comms team would discuss the grid detailing forthcoming government activity, that day's events, raise any issues, discussing in more depth any press and broadcast issues.

8.30 am to 9.00 am: Meeting in PM's office. Attended by PM and key staff plus others when appropriate. I would usually provide a brief media summary and the PM would then work through a pre-determined agenda including the plans for the day and pressing issues. These might include specific media issues. In the Prime Minister's absence George Osborne or William Hague would chair.

4.00 pm: Meeting in PM's office. A slightly smaller gathering of the PM and his key staff. There would be an update on the day's issues and looking ahead to the following day, or week. Another opportunity for ongoing and longer term issues to be discussed.

5.30 pm: Communications meeting. I would chair a second meeting of No10 communications special advisers, discuss live issues and the grid for the day or week ahead.

67. Other regular meetings took place to discuss the grid, foreign trips, Afghanistan communications and other planning issues. I travelled with the PM on some, although not all, foreign trips but would oversee the communications plan for all those visits in advance. I worked with the No10 events team led by Liz Sugg on the planning and staging of events involving the PM, both in and out of No10.
68. One of the biggest changes of approach from opposition to government with regard to communication and the media was the decision to reduce the amount of appearances by the PM. Cabinet members were encouraged to do more. We felt that Gordon Brown's habit of providing an almost constant commentary of interviews was the wrong approach and that David Cameron would aim to be less obsessed by day to day media demands. This had the benefit of creating more time for the real work of Government. It also created the impression, and more importantly a reality, of a calmer, more professional Government.
69. This was demonstrated by the fact that on arrival in No10, David Cameron also opted to swap Gordon Brown's private office, which resembled a newspaper newsroom complete with giant plasma screens showing 24 hour news channels, for the smaller office next to the Cabinet Room.
70. Before I left, I also worked with officials to complete a review of Cabinet Office and No10 communications. Together we produced a plan to create a more effective, communications structure in terms of cost and performance.
71. In summary, my job in No10 was to be one of a team of key advisers to the Prime Minister helping to deliver his plans for government, to work with the official communications team overseeing the co-ordination of government communications and to lead the coalition team of special advisers handling day to day media.

72. Both before and after the General Election I took broadly the same approach to my engagement with proprietors and senior executives of the newspaper groups. I still aimed to meet or talk to most editors, political editors and some columnists on a reasonably regular basis. I considered it to be an important part of my job.
73. I attach a schedule of media meetings in opposition (AEC/3) and one of media meetings in government (AEC/4). These have been compiled from incomplete itinerary cards and from my memory. They will not therefore be definitive, but have been drawn up in an effort to assist the Inquiry.
74. I would occasionally have lunch or dinner with proprietors or senior executives of newspaper groups. Sometimes I would just meet them for coffee. These coffee meetings would take place in or near to CCHQ and Parliament and later on, in or near No10. I would also meet regularly with broadcast journalists. Most of these meetings were off the record and the agenda informal. They were an opportunity for the journalists to seek guidance on the issues of the day and to discuss up-coming events for planning purposes. I would also use the meetings to clear up any inaccuracies or misunderstandings that had been printed or broadcast, and would aim to get the PM's message across.
75. Occasionally I would attend meals hosted by newspapers with David Cameron and other Shadow Cabinet and later Cabinet members. These would happen most frequently at Conservative Party conference but would also occur at other times during the year.
76. The conference dinners included those organised by The Telegraph (hosted by the Chief Executive, Murdoch MacLennan), The Daily Mail (hosted by Paul Dacre) and The Times (hosted by James Harding).
77. The meetings (breakfast, lunches and dinners) hosted by the Conservative Party at conference involved, at various times, almost all national newspapers. I do not have and so haven't provided a full listing in the schedules. We also met with the broadcast political editors and television executives from the BBC and other channels. In addition there was also a reception held for regional newspaper editors.
78. I attended coffee meetings between David Cameron and other journalists, at various times. In opposition, David and Samantha Cameron would also host occasional dinners at his home for media. These included newspaper and broadcast journalists. I would usually, although not

always, attend. I played a central role in organising this diary of activity but David Cameron was not always an entirely willing participant. Given the choice, I think he would have preferred to be doing other work or enjoying a night at home with his family. However, he understood, and reluctantly agreed, that it was important to meet with journalists, formally and informally.

79. It was important for three reasons. Firstly, you stood a better chance of getting your message across and of stopping misunderstandings quickly if you had good relationships. In a perfect world as Prime Minister you would issue a statement, give an interview, or stage a press conference and your message would be communicated to the public in fair, even-handed reports. Modern politics doesn't work that way. What we did and said required explanation and at times I needed to fight our corner for fair coverage.
80. Secondly, I took the view that it was important that journalists saw David Cameron in a relaxed and informal mode, as well as at work. Again, modern politics demands this. I felt it was important to show his authentic life away from work, not least as the Labour Party was working hard to convince the public that he spent his private moments lounging around a mansion, in top hat and tails, sipping champagne and nibbling on caviar. This was an important myth to dispel.
81. Thirdly, journalists want to meet politicians. There is no substitute in journalism for face to face contact. It was also important for David Cameron to hear what some of the journalists had to say on behalf of their readers and viewers. I believe I was even-handed in who had access to him.
82. At the invitation of the editor, Mr Cameron and other members of the Shadow Cabinet and later the Cabinet would also attend and give speeches at events organised by various newspapers. These included the FT, The Guardian and The Times. Although this narrative and the accompanying schedules contain a long list of media meetings I would stress this was by no means viewed as the most important part of my, or more importantly David Cameron's, job.
83. The media meetings could be cancelled or re-arranged, often at short notice, because of more important events. It was a constant struggle to maintain media relations whilst trying to do 'the day job' of co-ordinating and executing the party's (later the government's) message across a range of policy departments, the practical work around all events including major

speeches, conferences, the General Election campaign and the 24 hour job of managing the various stories that would break at any moment.

84. David Cameron's view was always clear, we would do our best to maintain good relationships but it should never get in the way of his doing the job of Leader of the Opposition and later Prime Minister.
85. The engagements with the media, as I have demonstrated, were sometimes formal, other times social. There was no hard and fast rule about which it would be.

#### **Continuing engagement with representatives of News International**

86. Rebekah Brooks has been a colleague and friend for around 15 years. Until the events of last summer I would see her socially, but only on a few occasions did I socialise with her in the company of David Cameron. Those occasions were mostly at parties with a large number of guests, including her 40th birthday, her wedding and a New Year's Eve party in 2008. I stayed at her home in Oxfordshire with my family on New Year's Eve in 2008 and 2010.
87. I recall two dinners with her and David Cameron both of which took place at conference, which were also attended by other Sun executives. These took place in 2009 and 2010. It's possible that similar events took place in 2007 and 2008 but I can't recall them. I have explained earlier that we had dinners, lunches or breakfasts with most other newspapers during conference as well. There was an event in Davos in January 2010, hosted by Rebekah, which David Cameron and I attended, along with a large number of guests, including other politicians. My family and I also spent a weekend at Dorneywood in 2010 as a guest of George Osborne and his wife. Rebekah and her husband were also guests.
88. I would talk to Rebekah from time to time, when she was both editor of The Sun and later Chief Executive of NI. Most of these conversations were social although we would on occasions talk about politics. In all professional conversations, especially those leading up to the General Election, I actively pursued a pro-Conservative and later pro-Government line. Coverage in The Sun and other News International papers shows that Rebekah didn't always listen to me.

89. With regard to James Murdoch, I met him alone for one early evening drink not long after he joined News International. I have bumped into him at social events on a number of occasions and always in company.
90. I had no contact with Rupert Murdoch from the day I left the News of the World until after I had been appointed by the Conservatives. I attended his summer drinks party in 2007 just after I had started in the post. We may have said a brief hello.
91. I next saw him at a birthday party he hosted for Rebekah Brooks at his London home in 2008. We had a brief conversation about politics. Soon after the election I suggested that David should aim to see editors and proprietors, especially those who had been supportive. When Rupert Murdoch came to London a visit to No10 was arranged. I met him when he arrived and took him to the Prime Minister's office. I didn't sit in on the meeting which I think lasted around 30 minutes. Afterwards, I met him later in the corridor and we had a brief conversation. The Prime Minister held similar meetings with other newspaper proprietors and senior figures including Paul Dacre.
92. The second post-election meeting with Rupert Murdoch was in New York on the day Mayor Bloomberg organised a party in honour of the Prime Minister. Before the party Rupert Murdoch met David Cameron for around half an hour. He and I met briefly when he arrived, but I did not sit in on the meeting. In the evening, before the dinner, I had a longer conversation with Rupert Murdoch and his wife Wendi at the drinks reception. From memory we mostly discussed American politics.
93. I also sat next to him at dinner for a while (the seating arrangements changed with each course) and we talked about British politics. Whoopi Goldberg sat on my other side and I spent most of my time at the table talking to her.
94. Not long after I took up my role with the Conservatives I had dinner with Les Hinton together with our wives in London. I have met him at a small number of social events, on one occasion in Davos and on New Year's Eve 2010. I also met with News International editors from time to time. These included lunches alone with James Harding, Dominic Mohan and John Witherow. We hosted Colin Myler and other News of the World executives for breakfast or tea at conference, I think, on two occasions. We made similar arrangements for other Sunday newspapers including the Mail on Sunday and the Observer. I did not have any separate meetings with Mr Myler that I can recall.

95. I met Fred Michel on a few occasions for coffee including one occasion, possibly, in No10. The agenda was always general and we did not, to the best of my recollection, ever discuss News International's commercial agenda (including BskyB). He also helped organise a lunch between David Cameron and the former Spanish Prime Minister Jose Maria Aznar when we were in opposition. I can't recall, but it is possible, that Mr Michel attended that lunch.
96. With regard to proprietors and chief executives of other newspaper groups; I attended a meeting with Eveyeny Lebedev, his father and Lord Rothermere shortly after their purchase of the Evening Standard which took place in David Cameron's parliamentary office. I have met Murdoch MacLennan a number of times for dinner, I have stayed with him once and count him, and his wife Elsa, as friends. I met Aidan Barclay on a number of brief occasions although never for a meal. I organised a lunch with Sly Bailey and her regional newspaper editors, hosted at Canary Wharf and later a lunch with her national newspaper editors. I also met Richard Desmond for coffee in his office.
97. I am friends with a number of newspaper editors and executives from different newspaper groups. I regularly met with executives from The Telegraph including the then editor Will Lewis, his replacement Tony Gallagher and deputy editor Ben Brogan. The Editor of the Mirror, Richard Wallace, is also a friend and we would occasionally meet for dinner. The Deputy Editor of the Daily Mail, Jon Staefel, I also know quite well and I would meet him occasionally. I met with Paul Dacre in his office and I attended a dinner he hosted. I also knew the former editor of the Independent Simon Kelner and we would see each other occasionally. I had lunch with Patience Wheatcroft editor of The Sunday Telegraph and later the Wall Street Journal. I also know the editors of some of the Sunday newspapers, including Tina Weaver at the Sunday Mirror and Ian MacGregor of The Sunday Telegraph and would meet with them for lunch or dinner. I met Deborah Turness, Editor of ITV News, for dinner on a few occasions and we met for coffee in No10. I also had lunch with Helen Boaden from the BBC (on at least one occasion with David Cameron) and I accepted an invitation from her to the Proms, with my wife. I had lunch on one occasion with John Riley from Sky News. In advance of and during the negotiations for the TV debates in 2010 I met with a number of broadcast executives.
98. I had good relationships at different levels with all national newspapers. I'd met Alan Rusbridger before joining the Conservatives, when I'd judged The Guardian Student Media Awards in 2006. It was clear to me on arrival at the Conservatives that the relationship with

The Guardian was well established at the highest levels of the Party. I ensured that The Guardian was treated fairly in terms of access to David Cameron and other politicians and I maintained professional and friendly relationships with the political staff.

99. I'd hoped for some time that The Sun would support us in the General Election just as I had hoped a number of other papers would. As we approached conference season the paper's coverage became less positive for Labour. I'm sure I discussed it with Rebekah and with Dominic Mohan. I would certainly have taken every opportunity, to the point of becoming a bore, to sing the praises of David Cameron and the Conservative Party and to encourage them to support us. That was my job.
100. I remember speaking to David Cameron after he had met James Murdoch in September 2009. He told me that The Sun would be supporting us. My view was that it was good news but that we should wait until it had actually happened. I played no part in the planning or timing of their announcement. I saw it break on Sky News while at home and then spoke with Dominic later that night or possibly the next day. I was pleased, of course. The biggest selling national newspaper switching their support from Labour to the Conservatives was positive. But, I didn't for a moment think that it would secure a General Election victory. I was, in truth, a little disappointed by the manner in which The Sun decided to switch support. I felt it was more a rejection of Labour than a positive endorsement of us. If I'd had half the influence on The Sun that some claim, the front page would have looked very different.
101. I want to make it quite clear that there was never any inappropriate deal between the papers and the Party. There were no conditions or contingencies suggested or levied in return for a newspapers' support. In my experience, from both sides of the equation, there was no quid pro quo between the Conservative Party (in government or in opposition) and News International. Nor indeed with any other media group.
102. There was a continual conversation with all media groups with the aim of persuading them to take a favourable view of the Party, its policies and its politicians. That engagement was a fundamental part of my job. During my time working in opposition I sought to secure the support of every newspaper, with the possible exception of the Daily and Sunday Mirror. There was even a time when The Guardian suggested to me that their support was possible. At a drinks reception in David Cameron's office a Guardian executive told me not to 'write off' the idea of a Guardian endorsement. I chose not to count on it.

103. I also put considerable energy into encouraging the Daily Mail, The Times and The Daily Telegraph's support and endorsement, none of which came easy. Endorsement ahead of an election is important, but more important in my view was the coverage received in the weeks and months ahead. In that regard The Sun, The Daily Mail, The Telegraph, the FT, The Times, and many other newspapers, gave the Conservative Party a rough ride.
104. That we ended with the support of so many national newspapers tells you that we had, over a long and difficult campaign, succeeded in convincing them that David Cameron was the best person to lead the country on behalf of their readers. But I didn't for a moment think any of these endorsements, including The Sun's, would be the deciding factor in the General Election. Instead, I held the strong view that TV coverage, not least as a result of the debates, would dominate the media landscape of the 2010 General Election campaign.

#### **Policy issues**

105. I did not participate in policy meetings in government and played no part in policy decision-making. I was involved in policy only in so far as to how it was communicated. I would sometimes be asked my view from a communications and political perspective and I would give it. Once the policy was decided and signed off I would then work with my team to decide how it should be communicated.
106. I don't remember having any involvement in policy making in relation to the BBC. I would give my view on BBC coverage, but would not be involved in policy decisions about issues such as the license fee, beyond my communications role.
107. I don't remember having any engagement beyond my communications role that touched upon policy relating to OFCOM.
108. My only involvement in the BSkyB issue, that I can recall, came after Vince Cable's comments to journalists from The Daily Telegraph. This was a significant communications moment in which I played a part in the handling. In relation to media policy more generally, I have no recollection of ever being involved, other than in the planning and execution of the communication strategy, once the policy had been formulated.
109. Finally, I should like to add that the ongoing police inquiry has meant that I have been denied access to people and material, which I would have liked to have had, in order to check

facts and the accuracy of my recollection. The constant media coverage surrounding recent events, which has been factual and speculative, accurate and inaccurate, makes it difficult for me to remember with any degree of clarity what I first knew, when. Having said that, and doing the best I can, I believe that the contents of this witness statement are true.

Signed



**Andrew E Coulson**

**1 May 2012**