

Claim No :

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

ADMINISTRATIVE COURT

B E T W E E N :

The Queen on the application of

ANDREW WOOD

Claimant

-v-

COMMISSIONER OF POLICE FOR THE METROPOLIS

Defendant

WITNESS STATEMENT OF ANDREW WOOD

I, Andrew Wood, of _____, make the following statement in support of my claim:

1. I am currently unemployed, but on 27 April 2005 I was employed as the media co-ordinator for the Campaign Against Arms Trade ("CAAT"), which is a

campaigning coalition of groups within the UK working for the reduction and ultimate abolition of the international arms trade, together with progressive demilitarisation within arms-producing countries. Instrumental to my involvement with CAAT was the fact that it is a peaceful organisation and has no history of violence or disorder. CAAT does not ever advocate violence as a method for getting its message across. I strongly believe in this approach to political campaigning. I do not have a criminal record and have never been arrested as a result of my involvement in campaigning activities.

2. On 27 April 2005, as part of my job at CAAT, I attended the Annual General Meeting (“AGM”) of Reed Elsevier plc (“Reed”), the parent company of Spearhead Exhibitions Ltd (“Spearhead”), at the Millennium Hotel in Grosvenor Square, London W1. Spearhead organises the biannual Ministry of Defence sponsored Defence Systems Equipment International (DSEi) arms fair, which took place in London’s Docklands in September of this year.
3. In the few weeks before the meeting, some employees and supporters of CAAT had bought a small number of single shares in Reed so that they would be able to attend the AGM and ask questions about the activities of Spearhead. I was at that time an employee of CAAT and had also bought a single share so I could attend the AGM. I would not have been allowed to enter if I had not been a shareholder. This was a fairly routine part of my job, and my intention was simply to participate in the meeting in the same manner as all other shareholders, and if possible to use the AGM as opportunity to learn more about Reed’s involvement in Spearhead in accordance with the rights given to shareholders.

Attending the AGM

4. On the morning of the AGM I and approximately 6 other employees representing CAAT arrived near Grosvenor Square for the AGM. There were also a few other

people who were CAAT supporters but not employees. There were about a dozen of us in total. Before the AGM, this group met for a coffee. We discussed how best to proceed at the AGM, and agreed that if it was appropriate a couple of us might ask the Reed Board of Directors questions, focusing on the possible impact of Reed's takeover of Spearhead upon Reed's other business interests. We agreed that CAAT's presence at the AGM was not designed to be disruptive. It was very important to all employees and associates of CAAT that all protests we were involved in were both peaceful and also non-confrontational. I was also dressed soberly for the meeting. My purpose in attending the meeting was not to draw attention to myself but was rather to learn more about Reed's involvement in Spearhead's activities and to ask a question if there was an opportunity.

5. After coffee, I and the other employees and supporters of CAAT went our separate ways and I made my own way to the Millennium Hotel for the AGM. I was alone at this point, and by the time I arrived at the meeting, I saw that two employees of CAAT, Richie Andrew and Katheryn Busby, were handing out CAAT leaflets to those attending the AGM and also passers by. I understand that Katherine had informed the police of this well in advance of the meeting and also got permission to hand out the leaflets from police officers on the day. I spoke to Richie and Katherine briefly before heading into the hotel.
6. After I entered the hotel, I went through security checks and left my bag and coat in the cloak room. Whilst going through security, the pocket whistle I have attached to my key ring for safety purposes was taken from me. I understood that this was because security at the meeting was very high and did not object to handing it over. I then went into the room where the AGM was being held and sat down. It struck me that the meeting was very sparsely attended. There were no more than 100 people there in total.
7. I listened to a presentation given by the Directors of Reed. Following this presentation, there was an opportunity for all shareholders present to put their

questions to the Board of Directors. I put my hand up and then waited until I was called to ask my question. At the appropriate point, I asked the Board of Directors whether they were concerned that Reed's involvement in the activities of Spearhead might have a negative effect on Reed's other brands, such as their educational publishing business. I directed my question to the chair and was polite and courteous. My question was answered by one of the Directors and that was the end of my direct participation in the proceedings. Several other shareholders (who I do not believe were connected to CAAT) also asked questions, and some of these were along similar lines to my own question.

8. The only disruption of any sort during the AGM was caused by two individuals not associated with CAAT or myself in any way. They chanted some slogans at the Reed Board of Directors until they were both removed by security. Following their removal, the meeting proceeded as normal.

Events following the AGM

9. I left straight after the AGM was closed as I wanted to get some fresh air. I collected my things from the cloakroom and walked out past most of the other shareholders who were staying in the building for a reception. On my way out I bumped into Ian Prichard who was also an employee of CAAT and we left the hotel together. Ian and I crossed to the other side of the road and stopped to talk with Kathryn Busby, who I believe had remained outside of the hotel throughout the AGM. I noticed a car parked beside the pavement where we were standing. A tall, well built police officer then got out of the car and began to photograph me with what looked like a wide angle lens camera. The officer was at most two metres away from me, and the camera was pointed straight at myself and Ian. The policeman was photographing us continuously. He even turned the camera in different directions, seemingly to get photographs of us from a number of angles. The camera also appeared to have a small video camera attached to it, although I

could not tell if this was being used. I was very shocked by the officer's behaviour. It made me feel anxious and actually frightened. I was also confused as to why this was happening to me, as I knew I had not done anything wrong.

10. In spite of feeling scared and intimidated, I was determined to stay calm and not to react to the situation. I turned slightly away from the policeman who was photographing us, and Ian and I carried on walking. We crossed Grosvenor Square and headed out by a side street towards Bond Street underground station. In this side street a police vehicle drew up beside us. Unfortunately I can't say for certain if this was the same vehicle that pulled up near us in Grosvenor Square. This time around four officers exited the vehicle and stood close around both of us. The officers asked Ian who he was and what he was doing at the AGM that morning. After Ian answered their questions, they asked me the same. During this time, I believe we were again being photographed by one of the officers.
11. I felt threatened and uncomfortable throughout this. At no point would any of the officers explain why we were being photographed or questioned. It was my unease at this and my knowledge that I not done anything wrong which meant that I chose not to give them my identity or any other details, but instead said something along the lines of "I am going about my lawful business" and carried on walking.
12. Ian and I continued to make our way calmly to Bond Street underground station, which is a few hundred metres from Grosvenor Square along some back streets. We were closely followed by the police officers all the way to the underground station. The police officers then followed us into the station and waited a short distance away from us whilst we bought tickets (which took a few minutes). When I had gone through the turnstile in the station, I was stopped by a ticket officer, who asked if he could see my 'Oyster Card' (period travel card). I told him that I had a carnet and not an Oyster Card. I was confused as my ticket had let me through the barrier without a problem so there seemed no reason to stop me. I now think that the ticket officer may have been seeking to identify me from an oyster card,

probably under instructions received from the police while we were buying tickets. However, I cannot prove this.

13. It was only when Ian and I had gone some way down the escalator to the platform that we turned around and saw that we were no longer being followed by the police officers.

Effect of the incident

14. The whole incident was extremely upsetting and I felt shaken and frightened as a result. The proximity of the police officer to me whilst he was taking the photographs was intrusive and intimidating. The fact that I had not done anything at any point to warrant intervention of any kind by the police left me feeling that being photographed, followed and questioned was unnecessary and unjust.
15. The knowledge that I have nothing to hide in terms of my own actions does not make this situation any easier for me. Instead it makes me more anxious that the photographs were taken when there did not seem to be any reasonable explanation as to why there was a need to do so.
16. I feel uneasy that I do not know how any information concerning me might be used by the police in the future, and that I had no control over the photographs being taken. I feel very uncomfortable that information might be kept on file by police indefinitely and without me being able to either confirm or dispute its accuracy. Furthermore, I have in the past been told by a journalist that details about me and my involvement in political movements had been disclosed to him by the police. In light of this I am extremely worried that any information that the police do compile on me could be passed on to others without my consent or even knowledge.

17. I also feel strongly that this sort of behaviour is simply wrong – we are part of a civil society in which the freedom to express your views through peaceful means is accepted as important and to be respected.

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

Signed:.....

ANDREW WOOD

Dated this day of October 2005