

IN THE COURT OF APPEAL

Filed on behalf of the Claimant
Witness: Andrew Wood
Third Witness Statement
Exhibits referred to: None
Date of signature:

On appeal from:

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

THIRD WITNESS STATEMENT OF ANDREW WOOD

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

1. When I attended the Reed Elsevier ("Reed") Annual General Meeting on 27 April 2005, I had worked at the Campaign Against Arms Trade ("CAAT") for about twelve months. I was one of six staff at CAAT, three of whom, including myself, worked three days a week. Prior to working as CAAT's Media Co-ordinator, I'd many years of experience undertaking press officer functions for various organisations dating back about a decade, in a paid and unpaid capacity. I am a member of the National Union of Journalists, I have been for the past five years;

and I'm affiliated to the Press and Public Relations Branch. I therefore have a good understanding of what is and is not involved in being a press officer.

2. Simply being a press officer doesn't make one of interest to the media. A press officer may act as a spokesperson on occasion but they would be *invited* to make a comment or give an interview by the media, and the press officer may decline or possibly refer the media to someone else in the organization - for example a campaigner.
3. Prior to the 2005 AGM, the staff at CAAT had decided that our presence would be low key. Reed, at that time, had only recently taken over Spearhead – a company which organised arms fairs. We'd not attended Reed's AGM prior to the one in 2005. We didn't hold a demonstration, nor a press conference or a photo-call at the 2005 AGM. There seemed to be little of potential interest to the media. No press release or other press resources like a briefing, was produced or distributed for the Reed AGM in 2005, and I did not contact any journalists about it. In other words, no media work was undertaken for the AGM at all.
4. It was not my expectation that I would be photographed at the Reed AGM, by the media or indeed anyone else.
5. My expectation in attending the 2005 AGM was simply to ask a question, and I considered my attendance as no different to any other shareholder. The AGM was largely unremarkable, it ended normally and there was no crisis or emergency which would have merited interest from the media or, indeed, from the police.
6. Even if CAAT had invited media attention on 27 April 2005, I would not expect the media to pursue a small campaign group's press officer in the way that the police pursued Ian Prichard and me after the AGM.

7. Finally, I should say that the police also have a quite different role to the media; their photography happens in a different context and it is used in a different way. The police have vested in them powers which are beyond those of normal civilians, and being targeted by them obviously has far greater implications than being targeted by the media. In this regard, I think it is quite reasonable to have a different expectation in relation to photography by the police to that in relation to the media.

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

Signed:.....

ANDREW WOOD

Dated this day of June 2008