Courts and Tribunals Judiciary

SUMMARY

PPT -v- (1) Independent Television News Ltd (2) Guardian News & Media Ltd [2026] EWHC 2818 (KB): Mr Justice Nicklin
3 November 2026

NOTE: This summary is provided to help in understanding the Court's decision. It does not form part of the judgment. The full judgment of the Court is the only authoritative document. Judgments are public documents and are available at: www.judiciary.uk, https://caselaw.nationalarchives.gov.uk and www.bailii.org

[*References in square brackets are to paragraphs in the judgment of the Court*]

IMPORTANT REPORTING RESTRICTIONS: Although the Court has dismissed the Claimant's claim, the Claimant continues to be protected by an anonymity and reporting restriction order, pending appeal. Until that order is discharged or varied, no person may publish the Claimant's identity, or information likely directly or indirectly to identify him in connection with these proceedings. The identities of three other individuals, referred to as CA, CB and CC, are also protected. Identification or speculation elsewhere, including on social media, does not authorise publication in breach of the order [11], [23]-[32].

Background

1. The Court has today handed down judgment following an expedited trial on 27–28 October 2026.

2. The Defendants, Independent Television News Limited and Guardian News & Media Limited, have conducted a joint journalistic investigation into allegations concerning the conduct of the Claimant, who is referred to in the proceedings as "PPT".

3. In summary, the Defendants allege that, over a period of years, the Claimant used his status and influence as a well-known public figure to establish contact with young women, some considerably younger than him, and that he engaged or sought to engage in seriously inappropriate conduct. Some of the conduct alleged, if proved, could amount to criminal offences. The Defendants propose to publish a documentary programme and associated articles about those allegations ("the Allegations") [2]-[4], [53]-[57].

4. The Claimant broadly denies the Allegations. This case was not a trial of whether they are true. The issue was whether the Court should prevent the Defendants from publishing them because of the effect that publication would have upon the Claimant's mental health and the risk that he would take his own life [5], [8], [33].

5. The Claimant relied upon Articles 2, 3 and 8 of the European Convention on Human Rights. Those provisions protect life, prohibit inhuman or degrading treatment and protect private and family life. The Defendants relied upon Article 10, which protects freedom of expression [6]-[7].

6. The Court has refused the injunction and dismissed the Claimant's claim. That decision does not amount to a finding that the Allegations are true, or to approval by the Court of any publication the Defendants may decide to make. It means only that the Court has concluded that the claims advanced in these proceedings do not provide a proper legal basis for restraining publication. The reasons for that decision are summarised below.

The risk to the Claimant

7. The psychiatric evidence was provided by Dr Inti Qurashi, who was appointed as the Single Joint Expert. Neither party sought to cross-examine him. The Court also considered the full factual history, including medical records, contemporaneous communications, witness statements, the Claimant's psychiatric admissions, a later attempt to take his own life and a recorded discussion with his solicitor [37]-[50], [66]-[76], [104]-[130].

8. The Court found that the Claimant has a serious and longstanding psychiatric vulnerability and an elevated underlying risk of suicide, independently of the proposed publications [78]-[80], [132]-[134].

9. The Defendants' initial notification of the Allegations caused an acute and severe deterioration in the Claimant's mental health. An adverse decision by the Court, the expectation of publication and publication itself would each cause a very substantial increase in his risk of suicide [135]-[139].

10. The Claimant has repeatedly said that he intends to take his own life if publication occurs. Those statements must be taken seriously, particularly because of his previous behaviour, planning and concealment. They do not, however, establish that suicide is inevitable or that treatment cannot reduce the risk [146]-[149].

11. At the time of the trial, community safeguards alone were not sufficient to manage the immediate risk, principally because their effectiveness depended upon the Claimant's cooperation and candour. Inpatient psychiatric care provided much greater protection because it enabled close observation, treatment, immediate intervention and restriction of access to means of self-harm. It significantly reduced the likelihood of suicide, although it could not remove all risk [150]-[159].

12. The Court accepted the expert's conclusion that the risk is capable of being reduced through treatment. The extent and timing of any improvement cannot presently be predicted, and treatment may take months rather than weeks [160]-[164].

13. The Court's overall conclusion was that: "An adverse decision, the anticipation of publication and publication itself would each give rise to a real and immediate risk to the Claimant's life through suicide": [166].

Articles 2 and 3

14. The finding of a real and immediate risk to life was an important part of the Claimant's Article 2 case, but it did not by itself decide the case. The Court also had to identify which part of the State bore legal responsibility for protecting the Claimant

against that particular risk and what reasonable protective steps were required [171], [175]-[192], [244]-[249].

15. The Court held that, for these purposes, responsibility for the Claimant's immediate safety rested with the psychiatric hospital and mental-health services. At the time of judgment, the Claimant was detained under the Mental Health Act 1983. The hospital controlled his care, treatment, observation, access to means of self-harm, leave and eventual discharge [247]-[248].

16. The Court had not taken responsibility for the Claimant's psychiatric treatment or safety in the same way. Its role was to decide the legal dispute between the Claimant and the Defendants. A refusal to prohibit publication would not make any future publication an act of the State [249].

17. No prior case establishes that the Court's knowledge of a suicide risk, together with its power to prohibit the event expected to increase that risk, is by itself enough to require the Court to act. Accepting the Claimant's argument would create a new category of legal obligation under Article 2, rather than apply an existing principle to new facts [250]-[257].

18. The Article 3 claim also failed. The Court accepted that publication would cause the Claimant acute and potentially prolonged mental suffering. The proposed journalism would nevertheless be the act of private organisations, not treatment inflicted upon the Claimant by the State. The established law did not impose a positive obligation upon the Court to prevent that suffering by restraining publication. The hospital's intervention was protective and therapeutic, rather than inhuman or degrading treatment [259]-[263].

The legal basis for the injunction

19. There was a separate legal difficulty. Although the High Court has a broad power to grant injunctions, that power must be exercised according to established legal principles. It does not itself create a claim against another person [264]-[265].

20. The Claimant had not brought a claim in misuse of private information, breach of confidence, defamation, harassment or any other recognised cause of action. His case depended directly upon Articles 2, 3 and 8 [266], [299]-[305].

21. The Court held that, in the circumstances of this case, the Convention rights relied upon and the Court's general power to grant injunctions did not provide a legal basis for creating a new obligation between the Claimant and the Defendants. This was a separate reason why the injunction could not be granted [264]-[271].

What protective measures did the law require?

22. The Court considered what measures the State would reasonably have to take even if the Claimant were correct about the scope of Articles 2 and 3. The State was already protecting him through inpatient psychiatric care and treatment. The law requires reasonable preventive measures, not a guarantee that every risk will be eliminated [272]-[274].

23. An injunction would remove the immediate publication-related trigger while it remained in force, but it would not treat the Claimant's underlying condition or remove his elevated underlying risk. The evidence did not identify a future date upon which publication would become safe simply through the passage of time [275].

24. The Court also rejected the alternative suggestion that publication should be delayed for a fixed period, including a possible period of 18 months. There was no clinical basis for selecting that or any other period. Continuing uncertainty was itself likely to prolong the Claimant's distress, suicide risk and inpatient treatment [276]-[277].

25. The Court concluded that inpatient treatment and psychiatric risk management were the reasonable and appropriate protective measures required of the State. Articles 2 and 3 did not require the Court to take the additional step of prohibiting publication [278]-[279].

Article 8 and freedom of expression

26. The Article 8 claim failed first because the Claimant had not identified a recognised legal basis upon which the Court could restrain the Defendants. The Court nevertheless went on to consider, in case that conclusion was wrong, how the competing rights would have been balanced [299]-[306].

27. The Court accepted that publication would interfere exceptionally seriously with the Claimant's private and family life. The possible consequences went far beyond ordinary distress, embarrassment or damage to reputation. They included a very substantial increase in suicide risk, severe psychiatric deterioration, compulsory detention and serious disruption to personal and family relationships [307]-[310], [325].

28. The Claimant also relied upon the possible effects upon his son. The Court recognised that death, serious psychiatric deterioration or prolonged admission would be likely to affect their relationship. There was, however, no direct evidence from the son, or from anyone speaking directly on his behalf, which enabled the Court to assess the nature and weight of the son's own rights and interests [296], [311]-[314].

29. On the other side were the Defendants' rights to investigate and publish, the rights of their sources to communicate their experiences and the public's right to receive information. Where sources wished to tell their own stories publicly, the law recognised that their personal autonomy was also relevant to the balancing process [288], [315].

30. The proposed publications concern serious allegations about the alleged use of status and influence by a prominent person over an extended period. The Court held that those matters were capable of making a significant contribution to public debate [316]-[318].

31. The Defendants' evidence was that they had conducted an extensive investigation, spoken to more than 100 people, including more than 30 sources said to have first-hand accounts, considered contemporaneous material and subjected the proposed publications to editorial and legal scrutiny [54]-[57], [319].

32. Those matters did not prove that the Allegations were true. The Court did not decide their truth. However, the proposed journalism did not lose its public-interest value merely because the Allegations were disputed and had not been determined in these proceedings [319]-[320].

33. The injunction would have been an exceptionally serious restriction upon freedom of expression. It would prevent the Defendants from publishing the results of their investigations and prevent their sources from communicating their accounts through the Defendants. The restriction might also have continued for an uncertain and potentially indefinite period [323]-[324].

34. If a direct balancing exercise had been available, and giving the consequences for the Claimant very substantial weight, the Court would not have been satisfied that Article 8 required the proposed publications to be suppressed. The Article 8 claim was therefore dismissed both because there was no proper legal basis for the injunction and, alternatively, because the balance of the competing rights did not justify it [299]-[306], [326]-[331].

Outcome and continuing restrictions on identifying the Claimant

35. The Claimant's claim for an injunction was dismissed. The Court did not determine whether the Allegations, or any of them, were true, and the dismissal of the claim does not amount to approval of any publication the Defendants may decide to make [8], [33], [320], [332].

36. The Claimant remains anonymous in the judgment. The Court held that dismissing the claim did not require it to identify him or itself place the full detail of the Allegations in the public domain. Whether, when and in what form to publish remains a matter for each Defendant, subject to its editorial responsibilities and any legal consequences of the publication actually made [26]-[29].

37. The anonymity and reporting restrictions will remain in force during the period allowed for any appeal and, if an appeal is lodged within that period, pending its determination or further order [29]-[32].