

Beyond Public Curiosity: Necessity, Proportionality and Foreseeable Harm in Celebrity Privacy Reporting

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Abstract: This article mainly discusses how media reporting should balance the protection of celebrities' privacy rights and the genuine public interest in cases involving personal privacy information and public curiosity. The article holds that the celebrity status may reduce the privacy expectations in truly relevant public interest matters, but this does not justify unrestricted intrusion into private life. The article studies and references several cases such as *Campbell v MGN*, *Von Hannover v Germany*, *Murray v Express Newspaper*, etc., distinguishes public interests from public curiosity, and advocates that every privacy detail of every celebrity in news reporting must have an independent, justifiable, and in line with public interests reason. Additionally, the article points out that images, medical information, and news related to family require more rigorous review because they may exacerbate the public humiliation of celebrities, cause excessive attention, and cause long-term harm. The article proposes an editorial framework based on the principle of proportionality, which focuses on the true public interest, incremental necessity, the least intrusive means, and foreseeable harm, aiming to protect democratic news reporting while preventing celebrity privacy from becoming a commodity for public consumption.

Keywords: Celebrity privacy, Public interest, Press freedom, Proportionality, Media ethics.

1. Introduction

In the current era of rapid iteration of digital media, the risk of celebrities' privacy rights being infringed upon by external media continues to rise, and the practical demands for protecting related rights have become increasingly prominent (Solove, 2006). As the speed of information dissemination gradually increases, celebrities' privacy, such as personal image, medical data, family information, vulnerable moments, etc., is constantly being secretly photographed, disseminated, and commercially exploited by paparazzi and unscrupulous media, causing the boundary between media's legitimate public interest reporting and sensationalistic curiosity-driven reporting to become increasingly blurred (Warren & Brandeis, 1890; Alach, 2008; Čeferin & Poler, 2017). This ambiguity creates a legal and ethical problem: once a story contains some element of public interest, the media may use that interest to justify the publication of far more intrusive private details. Although public figures need to legally give up some of their privacy rights when discussing public issues, supervising public power, and ensuring public safety, the fame of public figures cannot be used as a reason for their privacy lives to be randomly violated by the media (*Campbell v MGN Ltd*, 2004; *Von Hannover v Germany*, 2004).

Therefore, the core issue of cases related to celebrities' privacy does not lie in discussing whether celebrities have the right to privacy, but in how media can reasonably report on celebrities' privacy (Gavison, 1980; Solove, 2006). A news report may involve the privacy life of a celebrity based on legitimate public interests, such as correcting misleading public statements or exposing serious misconduct by the celebrity (*Campbell v MGN Ltd*, 2004; Čeferin & Poler, 2017). However, this does not mean that every private detail, photo, or vulnerable moment related to the event can be publicly reported by the media without discrimination (Wragg, 2015). The core controversy at the ethical and legal level lies in how to delineate the reasonable boundaries between public interest reporting and the privacy rights of celebrities in media

coverage (Kovach & Rosenstiel, 2021; Independent Press Standards Organisation [IPSO], 2024).

This article explores this issue through the legal and ethical frameworks of the United Kingdom and Europe, referring to and studying multiple cases such as *Campbell v MGN*, *Von Hannover v Germany*, *Murray v Express Newspapers*, and *Mosley v News Group Newspapers*. These cases indicate that public places do not automatically eliminate the privacy expectations of celebrities, and celebrities' self-disclosure behavior should not be regarded as the abandonment of their privacy rights (*Von Hannover v Germany*, 2004; *Douglas v. Hello!*, 2008; *Campbell v MGN Ltd*, 2004).

The article argues that the celebrity's fame inevitably reduces the public's privacy expectations on certain aspects regarding true public interest issues, but this does not mean that the media can intervene and report on every private detail, photo, or vulnerable moment related to the event without limit (*Campbell v MGN Ltd*, 2004; Wragg, 2015). On the contrary, every news report should be judged and reviewed based on a proportionality principle-based editorial evaluation system that focuses on real public interests, minimum necessity, minimizing the degree of infringement, and foreseeable damage (IPSO, 2024; European Court of Human Rights, 2022). In this way, while protecting democratic journalism, it prevents celebrities' privacy from becoming a commodity available for public casual consumption (Kovach & Rosenstiel, 2021; Warren & Brandeis, 1890).

2. Public Interest is Not Equivalent to Public Curiosity

When public media report on the private lives of celebrities, they must first distinguish between "public interest" and "public curiosity" (Čeferin & Poler, 2017). Both seemingly serve the public, but in fact, they have completely different social normative meanings. Public interest refers to a legitimate reporting reason at the legal and ethical level, emphasizing whether a disclosure is conducive to democratic

supervision, public accountability, public safety, correcting major misinformation, or exposing serious misconduct by the government or celebrities; while public curiosity is merely a market phenomenon, indicating that the audience desires to know the private lives of celebrities out of curiosity, entertainment, or prying motives. Privacy rights, as a basic human right, are worthy of protection not because the individual has public notoriety, but because privacy is closely related to personal autonomy, personality integrity, and human dignity. Gavison (1980) defined privacy as the restriction of others' access to oneself, obtaining information about oneself, and interfering with one's life. Solove (2006) also pointed out that privacy is not a single concept but a series of social harms related to information collection, information processing, information dissemination, and invasion. Therefore, even if the subject of the report is a celebrity, their private space still has legal and moral value. The media cannot equate "there are readers who want to see" directly with "the society needs to know".

This point was already demonstrated in Warren and Brandeis' (1890) classic paper. They criticized modern journalism for turning private gossip into a commercial transaction, using the audience's curiosity to invade the tranquility of personal lives. In other words, the concept of privacy rights has always been closely related to restricting commercial snooping. Prosser (1960) later classified privacy infringement into four categories: intrusion into private space, public disclosure of private facts, creation of misleading images, and unauthorized use of name or portrait. Through this classification, we can better discover that the infringement of the media on celebrities does not only occur when public media report false content; even if the information is true, if the acquisition method is invasive or the disclosed content is highly private facts, it may still constitute a privacy injury. Therefore, public interest should be understood as an incremental justification standard, rather than a passbook that can cover all private details (Wragg, 2015).

3. Campbell Case and the "Incremental Necessity" Principle

The *Campbell v. MGN Ltd* (2004) case has become one of the most important cases in discussions about the privacy rights of celebrities because it clearly demonstrates that "the core facts can be reported" does not mean "all incidental details can be reported". In this case, the newspaper's report contained several different levels of information: first, Campbell was addicted to drugs; second, she was undergoing drug rehabilitation treatment; third, she was a member of the Narcotics Anonymous mutual aid group; fourth, the report disclosed details such as the frequency of treatment, location clues, and her photo when she left the mutual aid group. The court's handling method indicates that the public interest must be subdivided into specific information units, rather than being judged generally. The media has the right to correct her previous denial of drug use in the public image because it involves the contradiction between her active creation of a public narrative and the facts; but when the report turns to treatment details and secretly taken photos, the focus of disclosure shifts from "correcting misinformation" to "showing shame and vulnerability", which is precisely the most serious infringement of privacy (Mendelson et al., 2018).

The significance of this judgment lies in that it rejects the

logic of "celebrities voluntarily expose themselves, so they should bear all the exposure". Campbell did indeed use her public image to gain professional benefits, and she did mislead the public on the issue of drug use; but these facts can at most reduce her partial privacy expectations on this specific issue, rather than canceling her reasonable privacy expectations in the treatment, rehabilitation, and medical mutual aid scenarios. Drug rehabilitation treatment is different from ordinary entertainment information; it involves multiple privacy information such as health, shame, social stigma, and rehabilitation risks. Once the media discloses treatment details, they are not only transmitting information but may also undermine the psychological security of the person seeking help and even be harmed by social opinion (Mendelson et al., 2018). The House of Lords of the United Kingdom based this proportion judgment on this, considering that reporting the core facts can be justified, but further disclosure of treatment details and photos constitutes an improper infringement of privacy (*Campbell v. MGN Ltd*, 2004).

Therefore, this case provides an important rule for media practice: for every additional private detail, the media must re-prove its necessity. For example, reporting "a certain celebrity publicly opposed drug use but actually used drugs" may have public interest because it involves the authenticity of the public image; but disclosing their treatment location, treatment time, doctor or mutual aid group information requires additional proof of why these details are indispensable. If deleting these details does not cause substantial loss to the public discussion, then the disclosure does not have necessity (Wragg, 2015). Wragg (2015) found in his research that subsequent case precedents failed to fully inherit this spirit because courts and editors sometimes, if they find that a report has some public-interest hook, no longer carefully review the harm caused by the disclosure of details. Such a binary logic weakens the principle of proportionality and turns the public interest from constraining the norms of public media into a "shield" for media to arbitrarily expand the scope of reporting (Mendelson et al., 2018).

From an ethical perspective, this also indicates that freedom of the press is not an unrestricted professional privilege, but rather an institutional function serving a democratic society. The media is protected because it can supervise power, expose deception, and promote public discussion, rather than because it can commercialize any eye-catching private information (Kovach & Rosenstiel, 2021). The value of the Campbell case lies in that it does not deny the legitimacy of media supervision of celebrities but rather requires the media to remain restrained in the supervision process. Truly responsible news judgment should not only concern whether one's news story can attract readers but should also strictly review whether there is any content in the manuscript that exceeds the scope of public interest and infringes upon the privacy rights of others. Only by doing so can the media truly fulfill its burden of proof for public interests.

4. Photos Taken in Public Places Still Fall Under The Purview of Privacy Rights Regulation

Apart from the private facts themselves, the media must also carefully review the use of photos and video materials. Many entertainment media often claim the legitimacy of their

reports by citing the fact that the photos were taken in public places. However, the judgments in the cases of *Murray v. Express Newspapers plc* (2008) and *Von Hannover v. Germany* (2004) both indicate that public places do not equate to the loss of privacy rights for public figures. In the Murray case, J. K. Rowling's young child was secretly photographed and published on the street. Although the photography took place in a public place, the court still held that the judgment of reasonable privacy expectations cannot be based solely on the location, but must take into account the age of the person being photographed, the nature of the activity, whether they consented, the method of photography, the purpose of the photo, and the impact on the person (*Murray v. Express Newspapers plc*, 2008). This judgment reminds us that privacy protection is for people's living situations, not just physical spaces. Just walking on the street does not mean that one consents to being followed, enlarged, sold, and permanently disseminated.

Von Hannover v. Germany (2004) further reinforces this point. The European Court of Human Rights held that the key to determining whether a celebrity photo can be published is not whether it was taken in a public space, but whether it truly contributes to public affairs discussions. Caroline von Hannover, as a public figure, of course may receive a certain degree of media attention; but her daily life photos such as shopping, vacations, and spending time with family do not significantly contribute to the public's understanding of politics, society, or public affairs. Therefore, the court held that publishing these photos as entertainment materials is more about satisfying the public's curiosity about the private life of celebrities rather than serving public interests (Rudolf, 2006). This logic is particularly important for celebrity reporting, as images are more likely to create humiliation, identifiability, and sustained dissemination effects than words. Because photos not only prove that something happened, but also visually fix the vulnerable state of the person and expose them to public judgment for a long time (Bell, 2025).

Mosley v. News Group Newspapers Ltd (2008) also illustrates that the combination of images and private details significantly aggravates privacy harm. In this case, the News of the World publicly reported Max Mosley's private activities details and secretly filmed videos and attempted to use public interest as a defense. However, the court held that private sexual activities voluntarily occurring between adults do not constitute public affairs; unless the media can prove that the relevant behavior involves illegalities, abuse of public office, or specific public risks, otherwise publishing such content is merely satisfying the public's curiosity (*Mosley v. News Group Newspapers Ltd*, 2008). This case shares a common point with Campbell: the court did not deny the possibility of reporting on celebrities through media but refused to mistake "excitement" as "publicity".

These cases collectively demonstrate that photos and videos should not be regarded as supplemental items of written reports, but should be considered as independent forms of privacy infringement. Even if written reports have certain public interest, the accompanying pictures must also undergo necessary and proportionality review. For instance, the media can report that a certain celebrity has made deceptive public statements, but this does not automatically mean that their medical treatment scenes, photos of their children, or pictures of their private activities can be published. The Editors' Code of IPSO also clearly stipulates that everyone is entitled to respect for their private

and family life, physical and mental health, and communication privacy; when invading someone's private life without their consent, the editor must prove the legitimacy of such action and must not take pictures of individuals without consent in public or private places where there is a reasonable expectation of privacy (Independent Press Standards Organisation [IPSO], 2024). Therefore, when reporting on celebrities, media cannot only focus on "whether the content is true", but must also examine "whether the presentation is necessary". Truth does not automatically make publication legitimate, nor does it make private information publicly available.

5. Opposing Viewpoint and Response - Dose the Commercialization of Celebrities Equivalent to Giving Up Their Privacy Rights?

Of course, those who support the idea that media should have more disclosure space might present a strong counter-argument: there is often a symbiotic relationship between celebrities and the media (Curry, 2000). For instance, many celebrities actively disclose their personal information through interviews, social media, brand endorsements, and entertainment reports in order to support the public image they have created and to gain economic benefits and higher visibility from public attention (Curry, 2000; Rojek, 2001; Kenyon & Milne, 2005). From this perspective, if celebrities choose to commercialize their image and selectively expose their private lives, it seems reasonable to consider that they should have lower privacy expectations for this (Curry, 2000; Kenyon & Milne, 2005).

However, when this viewpoint further develops from "lowering privacy expectations" to "celebrity commercialization being equivalent to giving up privacy", this overly absolute view becomes erroneous (Kenyon & Milne, 2005). This viewpoint blurs the concepts of the celebrity's commercial persona and the celebrity's privacy rights (Gavison, 1980; Solove, 2006). Celebrities can sell certain selected parts of their image, but this does not mean that their entire private lives can be freely extracted and consumed by the media (Kenyon & Milne, 2005; *Douglas v. Hello! Ltd*, 2007). Privacy is not a "all-or-nothing" right (Gavison, 1980; Solove, 2006). It is context-dependent, relational, and depends on consent, control, and the nature of the disclosed information (Gavison, 1980; *Douglas v. Hello! Ltd*, 2007). Therefore, the fact that celebrities participate in public publicity should not be regarded as a general authorisation for covert photography, intrusive surveillance, or the unauthorised reporting of highly personal information (*Douglas v. Hello! Ltd*, 2007; Alach, 2008).

Douglas v. Hello! Ltd provided a strong support for this distinction. In this case, Michael Douglas and Catherine Zeta-Jones had authorized a media outlet to publish selected wedding photos, but another magazine secretly took pictures and published them without permission (*Douglas v. Hello! Ltd*, 2007). The significance of this case lies in the fact that celebrities did not completely eliminate the privacy value of the event merely because they chose to commercially publish certain wedding photos (*Douglas v. Hello! Ltd*, 2007; Kenyon & Milne, 2005). The act of selling authorized wedding photos does not imply that unauthorized photos can be published without consent (*Douglas v. Hello! Ltd*, 2007). Therefore, this case indicates that the public exposure of celebrities does not

destroy their expectations of privacy; instead, it confirms that control over the conditions of disclosure remains central to privacy protection, especially where unauthorised material does not serve a genuine public interest. (*Douglas v. Hello! Ltd*, 2007; Richardson, 2003). The official judgment materials also clarified the distinction between authorized and unauthorized wedding photos, as well as the issue of whether unauthorized photos still retain confidentiality.

This is particularly important in celebrity reporting, as the media's argument about "self-exposure" can easily turn into an excuse for unlimited intrusion (Curry, 2000; Alach, 2008). The claim that celebrities "make use of the media" should not allow the media to treat their bodies, residences, medical conditions, children, or intimate relationships as objects that can be permanently consumed by the public (Warren & Brandeis, 1890; Solove, 2006; Alach, 2008). Public image is not equivalent to private life, and commercial visibility is not equivalent to moral consent (Gavison, 1980; Kenyon & Milne, 2005). Even if celebrities benefit from public attention, they still retain the legitimate right to control how, when, and in what form their private information is disclosed (*Douglas v. Hello! Ltd*, 2007; (Richardson, 2003)

Therefore, the more persuasive position is not that the celebrity's self-disclosure eliminates privacy, but rather that it can only reduce the celebrity's expectation of privacy in limited and specific circumstances (*Campbell v MGN Ltd*, 2004; *Douglas v. Hello! Ltd*, 2007). If the public image of a celebrity directly contradicts facts that involve public discussion, accountability, or serious misconduct that infringes upon public interests, then the media may have a legitimate reason to report this core contradiction (*Campbell v MGN Ltd*, 2004; Čeferin & Poler, 2017). However, the media still must provide a legitimate reason for the release of every additional private detail, image, or vulnerable moment of the celebrity beyond what is necessary to serve the public interest (Wragg, 2015; Independent Press Standards Organisation [IPSO], 2024). Celebrity status alters the contextual framework for privacy-rights balancing, but it does not eliminate the necessity, the principle of proportionality, and respect for the individual's right to privacy (*Campbell v MGN Ltd*, 2004; Wragg, 2015; European Court of Human Rights, 2022).

6. Towards a Proportionality-Based Editorial Framework

Based on the above discussion, this paper proposes an editorial review framework based on the principle of proportionality to assess celebrity privacy reporting. The core issue should not merely be whether a particular celebrity story attracts public attention, but whether the media can explain why this specific information, in this specific form, is necessary for public discussion (Wragg, 2015). The conflict between celebrity privacy and freedom of the press should not be regarded as a simple confrontation. As shown in *Campbell v. MGN Ltd* (2004), both freedom of expression and privacy rights are important rights, and neither should automatically take precedence over the other.

Within this framework, editors should first distinguish between genuine public interest and public curiosity. If the disclosed content can expose serious misconduct, correct significant misinformation, protect public safety, or promote democratic accountability, then such disclosure may be justified (Čeferin & Poler, 2017; Independent Press Standards

Organisation [IPSO], 2024). However, public curiosity does not equate to the need for society to know (Warren & Brandeis, 1890; Čeferin & Poler, 2017). Celebrity reporting is particularly prone to this confusion, as private images, medical details, family life, and vulnerable moments can easily be transformed into profitable entertainment content rather than truly meaningful public information (Warren & Brandeis, 1890; Alach, 2008; Solove, 2006).

Secondly, editors should consider every additional private detail as an independent ethical judgment. A "point of entry" with public interest should not open the door to unrestricted disclosure (Wragg, 2015). The media may report on the core contradictions in a celebrity's public image, but this does not automatically mean that it can further disclose treatment locations, children's photographs, intimate images, or other details that add little to public understanding (*Campbell v. MGN Ltd*, 2004; *Murray v. Express Newspapers plc*, 2008; *Mosley v. News Group Newspapers Ltd*, 2008). This reflects the logic of *Campbell v. MGN Ltd* (2004): even if there are certain public-interest factors in the overall reporting, this does not automatically justify the disclosure of treatment details and other private information. Wragg (2015) also points out that the significance of *Campbell v MGN Ltd* lies in the fact that, even when public-interest expression is involved, privacy may still need to be protected.

Thirdly, editors should ask whether the story can be told in a less intrusive way. If the public interest can still be achieved through anonymisation, deletion of photographs, blurring of locations, reduction of medical details, or avoidance of unnecessary mention of family members, then a more intrusive version of the report would be difficult to justify (IPSO, 2024). Therefore, the question is not just "Is this story true?", but also "Is this form of public disclosure necessary?" (Wragg, 2015; IPSO, 2024). This is also in line with the requirements of IPSO (2024), which states that when editors intrude into private lives without consent, they must prove the legitimacy of their actions, especially in situations where there are reasonable expectations of privacy.

Finally, editors should go beyond the day of publication and consider the foreseeable harm it may cause. A story does not end once it is printed or uploaded. Photographs may be archived, searched, shared, and re-circulated; medical details may cause stigmatisation; children's images may accompany them into adulthood; intimate information may turn a brief vulnerable moment into a permanent public record (Solove, 2006; Bell, 2025). Article 8 of the European Convention on Human Rights protects private life, family life, home, and correspondence, which further indicates that when reviewing reports, not only public value but also the long-term personal costs of disclosure should be considered (European Court of Human Rights, 2022).

Overall, these issues transform the abstract conflict between press freedom and privacy protection into a specific editorial review test: "Does this information really need to be made public in this form?" Media organisations cannot simply claim the right to report on celebrities because they attract public attention (*Campbell v. MGN Ltd*, 2004; *Von Hannover v. Germany*, 2004). They must explain why this disclosure serves the public interest, why every private detail is meaningful, why less intrusive methods are not sufficient to achieve the goal, and why the potential harm is commensurate with the public value of the report (Wragg, 2015; IPSO, 2024). Only through such rigorous review can press freedom continue to be connected with democratic

journalism practice, rather than becoming a licence for commercial intrusion into private lives (Kovach & Rosenstiel, 2021; Warren & Brandeis, 1890).

7. Conclusion

In conclusion, this article has argued that the conflict between celebrity privacy and press freedom cannot be resolved by simply asking whether celebrities have privacy. Through cases such as *Campbell v MGN Ltd*, *Von Hannover v Germany*, *Murray v Express Newspapers plc*, *Mosley v News Group Newspapers Ltd* and *Douglas v Hello! Ltd*, it has shown that celebrity status may change the context of privacy balancing, but it does not eliminate privacy itself. Public interest should not be confused with public curiosity, and the media must justify not only the topic of a report but also the specific private details, images and vulnerable moments it chooses to publish.

The main contribution of this article is to propose a proportionality-based editorial framework centred on genuine public interest, independent necessity, less invasive alternatives and foreseeable harm. This framework offers a more concrete way to assess celebrity reporting and to prevent private life from being turned into a commodity for public consumption. However, this article is limited by its focus on UK and European legal and ethical frameworks. Future research could further compare how other jurisdictions respond to celebrity privacy, digital media intrusion and the changing boundary between public interest and public curiosity.

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