



Press Recognition Panel  
Mappin House  
4 Winsley Street  
London W1W 8HF

Owen Meredith  
Head of Public Affairs  
PPA  
35-38 New Bridge Street  
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By email

6 November 2017

Dear Owen,

Re: IMPRESS media activity

I refer to your recent correspondence with our Chief Executive, Susie Uppal regarding this matter.

By way of background, as you are aware, in December 2016 and January 2017, the News Media Association and the Professional Publishers Association made allegations that members of the IMPRESS Board, Code Committee and CEO had published highly partisan, negative and extreme views of certain publishers and sections of the UK press. This it was said “raised concerns regarding the suitability of senior figures within IMPRESS to be involved in the regulation of the press, having regard to the requirements of independence and impartiality that are embodied in the Charter”.

The PRP Executive sought a response from IMPRESS to the complaint and carried out its own investigation in accordance with the PRP’s published guidance on cyclical and ad hoc reviews to determine whether there was a risk that any of the recognition criteria had been breached.

The matter came before the PRP Board in March, July and August 2017 (published Minutes are available on the website). At its March 2017 meeting, the PRP Board noted that the issues raised a risk of non-compliance by IMPRESS with criterion 23 of the Royal Charter, in that some of the statements complained of could give rise to a perception that membership of IMPRESS was not open to all publishers on fair,

reasonable and non-discriminatory terms. IMPRESS was made aware of those views.

Given that any decision to undertake an ad hoc review rests with the Board, at its July meeting the Board considered the Executive's further assessment and noted that, whilst it had initially appeared that there was a risk of non-compliance of criterion 23, the risk was now potentially reduced (and anyway any such non-compliance was not likely to be 'serious', as defined in the PRPs guidance) given the actions that had been taken so far (and as contemplated) by IMPRESS most particularly in its undertaking an internal investigation with a view to acting to remedy the position.

The Board considered it appropriate to wait to take a final view when IMPRESS had completed the implementation of the actions it decided upon. The Board also noted that given that there is no current likelihood of any of the affected publishers applying for IMPRESS' membership, there would probably in any event be no public interest in carrying out an ad hoc review at this time.

The PRP Executive therefore delayed their final assessment until the recommendations had been substantively progressed and it was clearer as to what IMPRESS themselves would be publishing.

The PRP Board noted that IMPRESS published its internal review panel report on the allegations on 26 September 2017 and that the IMPRESS Board has fully adopted the recommendations made by that report which have now been largely implemented. The action taken by IMPRESS includes:

- The introduction of a draft new Code of conduct for IMPRESS staff, Board and Committee members.
- The publication of a new register of interests for Board members, the Chief Executive and Chief Operating Officer to include any significant publications, previous paid and unpaid roles and any support for pressure groups which seek to influence others on any issue related to the news publishing industry and IMPRESS' work.
- Amending IMPRESS articles of association to include a requirement that a Board member's term of office will be brought to end if he/or she can no longer act fairly and impartially.
- An IMPRESS Board resolution on 12 September 2017 creating two separate sub-committees' A and B of IMPRESS Board. Regulatory sub-committee B which will deal with relevant publishers which fall into IMPRESS tariff band 7 (turnover of £20 million or more) and any complaints brought by those publishers, their editors or senior executives or journalists. Sub-committee A which will deal with regulatory matters in relation to all other actual and prospective members save where there is a complaint or an investigation that concerns an article that was originally published by, or is otherwise sourced from, a publisher that is or would be regulated by Sub Committee B were it a member of IMPRESS.

- Confirmation that Martin Hickman, Maire Messenger Davies and Emma Jones will not serve on sub-committee B and that Jonathan Heawood will not administer it.
- Advertising for two new Board members.

The PRP Board also noted that as far as it was aware no complaint had been made by any actual or currently likely prospective members of IMPRESS.

In the circumstances the PRP Board agreed with the assessment of the PRP Executive that although there had been a risk of non-compliance of criterion 23, the risk was now reduced (and anyway any such non-compliance was not likely to have been 'serious', as defined in the PRPs guidance) given the actions that had been taken by IMPRESS (most particularly in the adoption of the recommendations of its internal investigation) to remedy the position and given that the affected publishers are anyway not currently likely to seek membership of IMPRESS.

Should the position of any those publishers position change then the PRP would review the situation to see if any action was required.

Given the factors above, there would no significant public interest in a formal ad hoc review as contemplated by the Charter being undertaken now. The impact of the measures adopted by IMPRESS and IMPRESS' recognition generally will in any case be reviewed on a cyclical basis in accordance with the PRP's published guidance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'David Wolfe', with a large, sweeping flourish on the left side.

Dr David Wolfe  
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