

Dr David Wolfe QC,  
Chairman, Press Recognition Panel  
Mappin House,  
4 Winsley Street,  
London,  
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August 22, 2016.

Dear Dr Wolfe,

Further to the PRP board meeting tomorrow (August 23), I do not intend to repeat the very detailed and well-constructed points raised by my NMA colleagues, but I would like to re-emphasise my concerns about IMPRESS's relevance in Scotland.

I cannot see how IMPRESS can be recognised as a regulator for the whole of the United Kingdom when as far as I can see the only entity in Scotland applying to be regulated by IMPRESS is a website of relatively little significance. As such, IMPRESS must surely fall well short of the basic criteria laid down in both the Royal Charter and Leveson recommendations that a regulator needed to include "all significant news publishers" and I can see no possible justification for giving it any kind of status here as an official regulator.

By contrast, the members of the Scottish Newspaper Society, which represents all significant non-broadcast news providers in Scotland, have with only one exception (the Shetland Times, which has also rejected IMPRESS) signed up to IPSO.

Further, as the privileges in defamation actions the Crime and Courts Act 2013 attempts to accord signatories to an officially-sanctioned regulator are not applicable in Scotland, I find it hard to understand what relevance IMPRESS has in Scotland at all.

I also share the bemusement expressed by the NMA and the Society of Editors about the speed with which IMPRESS's attempt at a Code of Conduct has been passed for consideration, especially as Lord Leveson was specific in his praise for the old PCC code which has in fact been strengthened under IPSO.

Yours sincerely,



John McLellan,  
Director, Scottish Newspaper Society