

Dear Sir/Madam

As a member of a profession with a strongly patrolled and ethically driven code, I was shocked and appalled by the press standards highlighted in the phone hacking scandals and set out fully in the Leveson Report. I am therefore writing to ask you to ensure that the Leveson Report is delivered in full and effectively, and to give my support to the Hacked Off submission, which contains input from those whose lives have been mangled by the press.

There are specific issues which the Hacked Off submission has highlighted. Having gone through their petition, I would like to affirm my agreement with these issues, which I have included below. However, before addressing these details, I wanted to convey in the strongest terms my disgust with the behaviours of a substantial majority of newspapers over the past decade: their utter disregard for the law and for any conventional morality, as well as a focus on commercial imperatives without (seemingly) any guiding human principles. This has to change - and the crimes have been so egregious that it seems to me that any regulator of the press needs to have very significant and robust powers. Self regulation has definitively not worked.

I very much hope that your consultation will take such views on board, and act on them.

Investigations and sanctions

Criterion 18 is:

The Board, being an independent self-regulatory body, should have authority to examine issues on its own initiative and have sufficient powers to carry out investigations both into suspected serious or systemic breaches of the code and failures to comply with directions of the Board.

The investigations process must be simple and credible and those who subscribe must be required to cooperate with any such investigation.

I believe that:

The following Guidance should be provided:

- The first indicator currently says this:

The Regulator has a reasonable approach to deciding what are serious or systematic breaches of the code.

It should say:

The PRP will need to assess sufficiency of powers, and in doing so will assess whether the Regulator has sufficient powers to carry out an effective investigation into both serious or systemic breaches of the code and failures to comply with the directions of the Board (including the means of establishing whether the grounds for an investigation exist when reasonably suspected).

- The PRP will need to assess whether the investigations process is "simple and credible" and that those who subscribe are required to cooperate with any such investigation.

The following should be stated for the avoidance of doubt:

- For the powers to be sufficient and the process credible, the co-operation required must include the disclosure of otherwise confidential relevant information subject to a non-disclosure/non-publication undertaking by the regulator. [Note that Previous non-recognised self-regulators have found themselves in a position where those they regulate are under no obligation to

disclose any documents or records they deem to be non-disclosable for example on the basis of it being “confidential”.]

Criterion 19 is:

The Board should have the power to impose appropriate and proportionate sanctions (including but not limited to financial sanctions up to 1% of turnover attributable to the publication concerned with a maximum of £1,000,000) on any subscriber found to be responsible for serious or systemic breaches of the standards code or governance requirements of the body.

The Board should have sufficient powers to require appropriate information from subscribers in order to ascertain the turnover that is attributable to a publication irrespective of any particular accounting arrangements of the publication or subscriber. The sanctions that should be available should include power to require publication of corrections, if the breaches relate to accuracy, or apologies if the breaches relate to other provisions of the code.

I believe that:

The following guidance should be provided:

- The first indicator currently says:

The Regulator's approach to imposing sanctions is a reasonable one.

It should say:

The PRP will need to assess whether

· the Regulator's approach to imposing sanctions is a reasonable one in relation to whether it is “appropriate and proportionate”.

· the Board has sufficient powers to require appropriate information from subscribers in order to ascertain the turnover that is attributable to a publication irrespective of any particular accounting arrangements of the publication or subscriber.

The following should be added for the avoidance of doubt:

- The sanctions required to be available are not restricted to fines, corrections and apologies as set out in the criteria but should for example include the power to require the publication of a the outcome of an investigation.