

- Surname: **Hanson**
- Forename(s): **Nigel**
- Name of the organisation (if applicable): **The Financial Times Limited**
- Your email address:
- :
- :
- As an individual (please indicate):
- :
- For an organisation (please indicate): **Other - please specify**
- : **Global digital and print media organisation**
- Question 1: Do you agree with the principle of using indicators and examples of evidence as guidance to applicants and the PRP in determining applications?: **Yes**
- Give reasons if you wish.:
- Question 2: Do you agree with the indicators and evidence we propose?: **No**
- Give reasons if you wish. For specific comments on the criteria, use the comments box on the matrix.: **The indicators for Criteria 6 should require an applicant to demonstrate it has broad buy-in from "the industry". Otherwise funding to the level required for an effective self-regulator will not be sustainable and it would not amount to effective "self" regulation of "the industry". See in particular Leveson Vol. IV, Part K, Chapter 7, para 3.14: "I therefore recommend that a new system of regulation should not be considered sufficiently effective if it does not cover all significant news publishers." It would be important in any Leveson-compliant system for an approved regulator to provide, in a meaningful sense, effective and independent "self" regulation for "the industry", funded by the industry. Criteria 6 requires that funding for such a self-regulatory system should be settled in agreement between "the industry" and the Board, taking into account the regulator's obligations and the commercial pressures on the industry. However, the relevant indicators make no mention of a requirement for the Board to agree funding with significant news publishers such that the Board could be said to have agreed sustainable funding with "the industry". The inappropriate indicators might enable an applicant to gain approved status even though (i) it has no, or only very few or insignificant "industry" members, and (ii) it would not be reasonable in the circumstances for individual national or international media organisations to join it. For one thing, such isolated media organisations would risk having to fund its operations disproportionately themselves; for another, this could not be said to be a system of independent self-regulation for the industry as envisaged by Leveson or the Charter.**
- Question 3: Do you agree with our proposed approach to dealing with applications?: **No**
- Give reasons if you wish.: **The 'Validation Process' states that PRP will assess applications against the proposed indicators for each Criteria. However, the indicators for Criteria 6 appear misconceived, for the reasons set out above.**
- Question 4: Do you agree with our proposed approach to discussions with applicants?: **Yes**
- Give reasons if you wish.:
- Question 5: Do you agree with our approach to granting recognition?: **No**
- Give reasons if you wish.: **In 'Granting Recognition', PRP states it is anticipated that applications could be received from regulators of "various sizes" and "at different stages of operation", and that recognition could be granted even if they do not have evidence of sustainable operation. This seems misconceived. PRP should not be granting recognition to applicants which do not have the backing of significant news publishers so they are able to deliver sustainable independent, self-funded, self-regulation for "the industry" as**

recommended by Leveson (eg Vol IV, Part K, Chapter 7, para 3.14) and envisaged by the Charter.

- Question 6: Do you consider that our proposals will have any impacts, either positive or negative, including on our compliance with the Public Sector Equality Duty?: **Yes**
- Give reasons if you wish.: **The current proposals risk enabling a deficient regulator to gain formal recognition without its being able to provide sustainable and effective independent self-regulation for the industry. That would be an undesirable and retrograde step for the UK and a retrograde development from the perspective of the press both in this country and abroad.**