

From: [Julian Petley](#)
To: [Applications](#)
Subject: Further submission to the PRP re IMPRESS
Date: 04 March 2016 18:32:30

Dear Sir/Madam,

Yesterday (Thursday 3 March) I made a submission to the PRP regarding the application by IMPRESS for recognition by the PRP. In the interim period, however, I have been reading Associated Newspapers' submission to the PRP on this subject, and although I regard this as no more than the latest episode of that company's endless propaganda campaign against Leveson (and indeed against the PRP and IMPRESS), I feel the need to make an additional submission (below) in order to make a point about Charter Criteria 6 which has been misrepresented by Associated, no doubt deliberately and in its own interests.

Sincerely, Julian Petley.

Charter Criteria 6, Funding, states "Funding for the system should be settled in agreement between the industry and the Board, taking into account the cost of fulfilling the obligations of the regulator and the commercial pressures on the industry. There should be an indicative budget which the Board certifies is adequate for the purpose. Funding settlements should cover a four or five year period and should be negotiated well in advance."

The funding arrangement that IMPRESS has with the IPRT is entirely satisfactory, and has the distinct advantage of making it much more independent of the industry than the model adopted by the PCC previously and IPSO latterly. The criteria cannot rationally be interpreted to mean that a regulator like IMPRESS, which is subsidised transparently by an independent charity, and which can make decisions free from the control or influence of any funding body, including that independent charity, is in breach of the letter or spirit of this criteria.

The criteria makes specific reference to the need to have "regard to the commercial pressures on the industry". Having an independent source of income (which is transparent and allows no control by the funder) can serve only to fulfil this criteria by reducing the burden on the industry (in the sense of that segment of the industry which chooses to subscribe to IMPRESS).

The members of IMPRESS are in no doubt about the nature of the external independent subsidy of IMPRESS, and their agreement to sign up in the full

knowledge of that, fulfils the requirement of there being an agreement between the industry (that is, the member publishers) and the regulator.

Associated Newspapers Limited in their submission (see here <http://pressrecognitionpanel.org.uk/wp-content/uploads/2015/09/Associated-Newspapers-Response-to-Press-Recognition-Panel-30-7-15-2.pdf>) to the PRP consultation on the criteria state "The Criteria clearly requires any self-regulator to be funded by the industry it regulates". This is plainly false, and I note that the PRP explicitly rejected this view in developing its "indicators" in the Matrix it published following the consultation.