



PRESS RECOGNITION PANEL BOARD MEETING

29th meeting of the Press Recognition Panel
10:00, Tuesday 28 March 2017

Mappin House, 4 Winsley Street, London W1W 8HF

AGENDA

Indicative timings

Public session

- | | | | |
|----|---|--------|---------------|
| 1. | Welcome | Chair | 10:00 |
| 2. | Apologies for absence | Chair | 10:00 |
| 3. | Declarations of interest | Chair | 10:00 |
| 4. | Minutes of the meeting held on 28 Feb 17,
outstanding actions and matters arising
<i>For noting</i> | Chair | 10:00 – 10:05 |
| 5. | Chief Executive's report – March 2017
Paper PRP12(17)
<i>For noting</i> | SU | 10:05 – 10:10 |
| 6. | Finance report – February 2017
Paper PRP13(17)
<i>For noting</i> | SU/JS2 | 10:10 - 10:15 |
| 7. | Governance policies review – Part 3
Paper PRP14(17)
<i>For decision</i> | CR | 10.15 – 10:30 |
| 8. | Board remuneration and time commitment
Paper PRP15(17)
<i>For decision</i> | Chair | 10:30 – 10:40 |
| 9. | Any other business and close of public session
<i>Including comments from the floor</i> | Chair | |

Confidential session

- | | | | |
|-----|--|----|---------------|
| 10. | Chief Executive's report – March 2017
Paper PRP12(17)
<i>For noting</i> | SU | 10:45 – 10:55 |
|-----|--|----|---------------|

- | | | | |
|-----|---|-------|---------------|
| 11. | ARC verbal update
<i>For noting</i> | HR | 10:55 – 11:10 |
| 12. | Final business plan and budget
Paper PRP16(17)
<i>For decision</i> | PN/SU | 11:10 – 11:30 |
| 13. | Communications and stakeholder engagement strategy
Paper PRP17(17)
<i>For decision</i> | PN/SU | 11:30 – 12:00 |
| 14. | Executive analysis on IMPRESS Board media activity
Paper PRP18(17)
<i>For noting and comment</i> | SU | 12:00 – 12:30 |
| 15. | Draft consultation paper on Fees
Paper PRP19(17)
<i>For decision</i> | CR | 12:30 – 13:00 |
| 16. | Any other business | | |

Date and time of next meeting: Tuesday 25 April 2017, at Mappin House, 4 Winsley Street, London W1W 8HF, starting at 09:00



PRESS RECOGNITION PANEL

Minutes of the 28th meeting of the Press Recognition Panel Board held on 28 February 2017 at Mappin House, 4 Winsley Street, London W1W 8HF

Present: David Wolfe QC (Chair), Harry Cayton, Emma Gilpin-Jacobs, Carolyn Regan, Harry Rich and Tim Suter.

In attendance: Susie Uppal (Chief Executive), Paul Nezandonyi (Head of Communications and Stakeholder Management), Caroline Roberts (Head of Regulatory Affairs) and Simon Edwards (Regulatory Affairs Manager) (Items 10-12), Saima Ansari (Executive Administration Manager), Adam Gibbs and John Speed (JS2 Ltd)

BOARD MEETING – PUBLIC SESSION

Welcome

1. The Chair **welcomed** Members and attendees to the twenty eighth meeting of the Press Recognition Panel Board.
2. The Chair also **welcomed** James Connal (Capital PR) as the member of the public who was in attendance and content to be named as having been present.

Declaration of members' interests

3. Tim Suter confirmed the information that he had provided in the confidential session of January's Board meeting: he had been commissioned by the Broadcasting Authority of Ireland, through his company Communications Chambers, to carry out the statutory investigation into the impact on plurality of news in Ireland of the purchase of a number of titles by Independent News and Media. The role had been publicly announced by the Broadcasting Authority of Ireland and it was noted that this declaration has no impact on the UK media or press activity.

Minutes of the meeting held on 26 January 2017, outstanding actions and matters arising

4. The minutes of the meeting held on 26 January 2017 had been circulated

DRAFT

earlier to the Board and these were recorded as factually correct. It was agreed that it would be useful to add the positions held by Paul Farrelly (MP for Newcastle-under-Lyme) and Sashy Nathan (Director of Advocacy - 89up) for information.

5. The Chair mentioned that there had been an email exchange on 27 February between Chief Executive and James Connal. James said that he commended the Board's decision to publish redacted minutes of the confidential sections of the meetings and that his comment at the last meeting should not be a criticism. It was agreed that para 21 of the Minutes would be reviewed accordingly.

Chief Executive's Report – February 2017 – Paper PRP06(17)

6. The Board received a paper which provided an update on Executive activity since the last Board meeting on 26 January 2017.
7. The Chief Executive updated the Board on matters since her report was drafted:
 - The NMA had been given leave to proceed with their application for Judicial Review. Counsel was drafting the PRP's detailed grounds of defence.
 - The PRP had received an email from a journalist asking if they could have copies of the court documentation. The Chief Executive confirmed that she would seek Counsel's advice as to whether and to what extent this was permissible and an update would be provided to the Board.
 - The consultation on the proposed process for variations submitted by approved regulators would close on 23 March 2017.
 - Tim Suter would accompany the Chair and the Chief Executive to the meeting with Lord Blunkett on 1 March 2017.
 - Harry Cayton noted that in the minutes of the meeting with Lord Atlee it was stated (at para 2) that the 'PRP was satisfied that the Charter criteria were complete and effective and that the PRP had identified no changes that it would make, if it had the option'. The Board agreed that while it was correct that the Board had not identified any need for changes, it had not formally considered the matter.
 - The Board discussed the correspondence that was attached in Annexes D and E. The PRP additionally had written to Tony Gallagher, Editor-in-Chief for The Sun and Stig Abell, editor for Times Literary Supplement. Copies of the letters would be attached to the Chief Executive's March report. No responses had, as yet, been received.
 - The Board confirmed that the Executive should continue to contact publications when it identified inaccuracies about the PRP's role and

DRAFT

work in media stories. Harry Cayton noted that the myth busting fact sheet that was issued to stakeholders in January 2017 to address misinformation had been well received and suggested conducting a similar exercise again in future.

- The tenancy agreement for our office has been extended until the end of May 2017.
 - A meeting was held with Comis recently. The relationship was working well and they were providing a good service.
 - Detailed discussions have taken place with Sherry concerning the minor website breach and the recommendations to strengthen security have been taken on board. It was recognised that as the website did not contain any confidential or sensitive information, this posed less concern.
 - Insurance policies have been reviewed and renewed for the next year. Given the level of brokerage fees it was not considered to be worthwhile to review insurance arrangements on a 6 month basis.
 - A meeting had been held with JS2 and a reduction in the monthly JS2 fee had been agreed. This would be reviewed again in 6 months' time.
 - As previously discussed by the Board, the Executive will be transitioning to a flexible organisational design between the end of March and the end of May. JS2 and Harry Rich continue to be closely engaged in relation to the financial implications.
 - JS2 confirmed that the some of the current laptops have been written off for accounting purposes. Following advice from Comis, two smaller laptops will be procured with supporting IT to enable effective and flexible office and home working.
 - The Board expressed their thanks to the team for accommodating the move to a more flexible organisational design.
8. The Board **noted** with thanks the contents of the Chief Executive's report.

Finance Report January 2017 – Paper PRP07(17)

9. The Board received a paper which provided an update on the financial position as at 31 January 2017.
10. The following points were raised in discussion:
- The Board **noted** the latest financial position as at 31 January 2017
 - The additional legal costs relating to the Judicial Review were noted. The Board agreed that a footnote should be added to reflect that the legal costs would be considerably more if it were not for the Chief Executive acting as the PRP's Solicitor and if external solicitors were engaged.

Annual Governance Framework Review – Paper PRP08(17)

11. The Board considered and agreed the recommendations for the second tranche of policies with the following exceptions and additions:
- Board Rules of Procedure: The Board would prefer to receive paper copies of Board papers although the Executive should explore options for trimming the cost if possible. It was also noted that as the Board move to fewer meetings and less papers would need to be produced, the printing costs will automatically go down.
 - Declaration of Conflict of Interest: The PRP's Terms and Conditions should be referenced in full once finalised.
 - Mission and Approach: last bullet on page 6, add 'and' after employer'.
 - Corporate Social Responsibility Policy – this should remain as a standalone policy.
 - Policy on working in Scotland/ Northern Ireland: these should remain as standalone policies, however the first half of the first sentence should be removed and cross reference made to the Communications Strategy.

Senior Independent Board Member Appointment – Paper PRP09(17)

12. The Chair thanked Tim Suter for his contribution and support in the role of Senior Independent Board Member during the past two years. The Board unanimously re-appointed Tim for a further final two years in the position.
13. The Board agreed to update the role description by adding the following qualification to the responsibilities: 'The Senior Independent Board Member will, *as necessary and appropriate*:...' It was agreed that that the reference to the Remuneration Committee at 2.8 be deleted and Nominations Committee inserted.

Any other business and close of public session

14. None raised.

BOARD MEETING – CONFIDENTIAL SESSION

Minutes of the meeting held on 28 February 2017, outstanding actions and matters arising

15. The confidential section of the Minutes was recorded as factually correct.

Chief Executive's Report – February 2017 – Paper PRP06(17)

16. redacted

17. redacted

Draft Business Plan and Budget 2017/18 – Paper PRP10(17)

18. redacted

19. redacted

Consulting on a Fee Framework for Applications and Regulators – Paper PRP11(17)

20. The Board considered a paper that provided details about consulting on a fee framework for applications and regulators. redacted

21. Redacted. It was observed that the proactive restructuring around organisation design had been undertaken to reduce costs and maximise the existing finances and in response to predicted peaks and troughs in workload. redacted

22. redacted

23. The draft consultation was discussed in detail and the following amendments were raised to be addressed in the revised draft:

- The Charter requirement to undertake a fees consultation at this stage should be brought out in the introduction.
- redacted

24. A revised draft would be provided to the Board for consideration at the March Board meeting.

Any other business and close of confidential session

25. The Chief Executive informed the Board that the Executive's update on IMPRESS' Board media activity would be brought to the Board in March's meeting.

26. It was agreed that it would be useful for the Board to undertake a review of the previous 3 years activity at the end of this year.
Post Meeting Note: This item has been scheduled for discussion by the Board for the Board meeting on 24 October, noting that there is no meeting scheduled for November.

Date and time of next meeting

27. The next scheduled meeting of the Board will take place at 10:00 on Tuesday 28 March 2017 at Mappin House, 4 Winsley Street, London W1W 8HF. The ARC will meet from 8:30-10:00.

Drafted: Saima Ansari
Executive Administration Manager

Signed: David Wolfe QC
Chair

Dated: March 2017



PRESS RECOGNITION PANEL BOARD

CHIEF EXECUTIVE'S REPORT – MARCH 2017

Meeting: 28 March 2017

Status: for noting

Lead responsibility: Susie Uppal,
Chief Executive

Contact details: 07790034348 or
020 3443 7072

Purpose

1. The purpose of this paper is to provide an update to the Board on Executive activity since the last Board meeting on 28 February 2017.
2. The Board is invited to **note** the contents of the Chief Executive's report.

Executive Summary

3. The Board is being updated in respect of organisational matters that have progressed since the 28 February 2017 Board meeting.

Background and analysis

Delivery highlights / business plan update / key projects update

Judicial Review

4. We have published copies of our summary and detailed grounds of resistance on our website. The hearing has been listed for 29 and 30 June 2017.

Consultations

5. We are currently consulting on the proposed amendment to our Ad Hoc and Cyclical Review process. The consultation closes on 23 March 2017 and an update will be provided at the Board Meeting.

PRP12(17)

Stakeholder engagement

Stakeholder meetings

6. The Chair, Tim Suter and I, met with Lord Blunkett on 1 March 2017. An agreed note of the meeting will be published on our website shortly.

Correspondence

7. As I reported verbally at the last Board meeting, I wrote to Stig Abell (Editor, The Times Literary Supplement) following his recent appearance on Radio 4's The Media Show in which he discussed matters related to press regulation. As part of the PRP's ongoing aim to understand the wide ranging views that people hold on issues related to our role and work, I invited Mr Abell to meet with us. We received an acknowledgment, but we have yet to receive a formal response. A copy of my letter is attached at Annex A and it has been published on our website.
8. As I reported at the last Board meeting, on 8 February 2017, Tony Gallagher (Editor-in-Chief of The Sun) appeared on Radio 4's Today Programme and stated concerns about political interference in press regulation following IMPRESS being recognised by the PRP. Given our ongoing aim to understand the views of everyone affected by the PRP's work, I wrote to Mr Gallagher inviting him to clarify his statement. We received an acknowledgment, but we have yet to receive a formal response. A copy of my letter is attached at Annex B and it has been published on our website.

Research update

9. Annex C includes an update on key external matters relevant to our work.

Corporate services update

Premises

10. The tenancy agreement for the current office has been extended from 30 April 2017 to 31 May 2017 at the current rate. I am in the process of determining our ongoing needs in terms of office space.

Implications

11. The implications of decisions taken by the Board as set out in this paper are as follows:

PRP12(17)

- Budget – any budget considerations are referenced in individual Board papers. There are no specific implications in addition to the issues referenced;
- Legislation – no specific implications;
- Resources – any resourcing considerations are referenced in individual Board papers. There are no specific implications other than these;
- Equality, Diversity and Inclusion – no specific implications.

Devolved Nations

12. There are no implications/differences in relation to the areas of work covered in this paper and the devolved nations.

Communications

13. Communications issues are dealt with at paragraphs 6 to 8 of the Paper. There are no other issues to report which have communications implications, so far as I am aware.

Risks

14. There are a range of risks involved in the areas of work covered in this Paper.

Recommendations

15. The Board is asked to **note** the contents of the Chief Executive's report.

Attachments

Annex A – Letter to Stig Abell (Editor, The Times Literary Supplement)

Annex B – Letter to Tony Gallagher (Editor-in-Chief of The Sun)

Annex C - Update on key external matters



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

Stig Abell
Editor
The Times Literary Supplement

Sent by email only

16 February 2017

Dear Mr Abell

Invitation to meet with the Press Recognition Panel

I am writing to you, having heard your interview on BBC Radio 4's The Media Show on 15 February 2017. During the interview you expressed views on the current state of press regulation in the UK, and on the increasingly global nature of news publications.

The PRP is keen to understand the wide range of opinions on press regulation, as this helps to inform our work and role. Our Chair, David Wolfe, regularly meets with interested parties and we would find it useful to meet with you to discuss your views. Our meetings are held in private but an agreed note of the discussion is published on our website afterwards. You can see these notes and details of who we have met at www.pressrecognitionpanel.org.uk/stakeholder-meetings.

I sincerely hope that you would be interested in meeting with David. If so, then our teams can liaise to identify a suitable date.

I look forward to hearing from you.

Yours sincerely

A handwritten signature in black ink, appearing to be 'David Wolfe', is located at the bottom of the letter. The signature is written in a cursive style and is set against a light grey rectangular background.

Susie Uppal
Chief Executive
Press Recognition Panel



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

Tony Gallagher
Editor-in-Chief
The Sun

Sent by email only

14 February 2017

Dear Mr Gallagher

I am writing to you having heard your interview on Radio 4's Today Programme on 8 February 2017. During the interview, you were asked: "What's your beef with IMPRESS?"

In response, you answered: "IMPRESS is a state-sponsored regulator. It would allow MPs to have some control over us."

The recognition system was intended to remove political interference from press regulation. On 25 October 2016, the Board of the Press Recognition Panel (PRP) thoroughly assessed IMPRESS's application for recognition and recognised IMPRESS as an approved regulator. This means that IMPRESS is independent of government, politicians or any other such interest.

In addition, by virtue of our Royal Charter, the PRP has a unique and unprecedented independence from government and politicians. Indeed, in a recent meeting, Karen Bradley MP, the Secretary of State for Culture, Media and Sport, confirmed to our Chair, David Wolfe, that neither she nor any other politicians or part of government or the state had any ability to steer the PRP. (A note of the meeting has been published on our website at <http://pressrecognitionpanel.org.uk/stakeholder-meetings>.)

The PRP is keen to understand the views of everyone who is affected by our role and work, so it would be helpful if you could please set out your concerns about political interference more fully. Alternatively, if you would prefer, I can arrange for you to meet with David Wolfe to discuss matters.

I look forward to hearing from you.

Yours sincerely

A handwritten signature in black ink on a light gray background. The signature is cursive and appears to read 'Susie Uppal'.

Susie Uppal
Chief Executive
Press Recognition Panel

Update on key external matters

1. The update on key external matters is a research-informed piece based on a sample of information available in the public domain.

Commercial Landscape

2. The Sun has announced that it has overtaken the Mirror to become the third most popular news website in the UK. In January 2017, Sun Online had a total digital audience of 25.4m unique visitors across the month in the UK, ahead of Mirror Online on 23.8m. Mail Online is in second place on 29.3m and the BBC remains top on 39.9m.
3. The Evening Standard has moved to a single daily print edition, while weekly magazines Marketing Week and the Lawyer have moved to monthly publication as part of publisher Centaur Media's long-term plan to move away from print.
4. Press Gazette reported that local weekly newspapers lost print circulation by an average of 11.2 per cent year on year in the second half of 2016.
5. The FT reported that the Metro has become the UK's most-read daily newspaper, overtaking The Sun and the Daily Mail, with an audience of 10.4m a month.
6. The News Media Association has highlighted the news media industry's contribution to the UK economy. They pointed out that the news media industry contributed an estimated £5.3 billion in gross value added to the UK economy in 2015 and invested more than £97 million in digital services.

Political

7. The Culture, Media and Sport Committee has published its response to the Government's consultation on section 40.
8. On 14 March 2017, Ben Howlett MP tabled a Commons question asking the Chancellor of the Exchequer whether the Chancellor had received a request from the PRP for additional funding under the terms of the Royal Charter on Self-Regulation of the Press. (NB. The PRP has made no such request.)
9. The National Union of Journalists in Wales has renewed a call for the establishment of an expert news advisory group by the Welsh Government after it emerged that Local Newspaper group Newsquest was given a £246k state subsidy to safeguard jobs at a subbing hub in Newport which is now closing.
10. Former Chancellor of the Exchequer, George Osborne, MP for Tatton, has been appointed as Editor of the London Evening Standard.



PRESS RECOGNITION PANEL BOARD

FINANCE REPORT – FEBRUARY 2017

Meeting: 28 March 2017

Status: for noting

Lead responsibility: Susie Uppal, Chief Executive

Contact details: Susie Uppal, Adam Gibbs (JS2)

Purpose

1. The purpose of this paper is to update the Board on the finance and banking position as at 28 February 2017.
2. The Board is invited to **note** the latest financial position.

Background and analysis

Finance

3. At the meetings held on 5 and 18 December 2014, the Board noted that finance reports would be added to the agenda for each Board meeting.
4. A bank-reconciled set of management accounts as at 28 February 2017 is attached at Annex A.
5. A reforecast of the results to 31 March 2017 was circulated to the Board for the November 2016 Board meeting. Actual results are compared to the reforecast rather than the approved budget.
6. The deficit for the period ended 28 February 2017 is £638,851 against the November 2016 forecast of £634,929. This represents a negative variance of £3,922 on forecast to the year to date and a positive variance of £40,727 on the original budget for the year to date. Details and an explanation of why key variances have arisen are detailed against the relevant budget lines.
7. The Board will have noted that the application for Judicial Review is now proceeding. This will have some impact on the forecast for HR and legal costs. Counsel's fees of £6,120 have been incurred to date and the Board will be kept

up to date on this. The Chief Executive is acting as the PRP's Solicitor rather than an external party, which has avoided legal costs being considerably higher.

8. The organisation will soon begin its transition into the new "fixed and variable model" as discussed by the Board. As reported by the Chief Executive, there will be a gradual phasing in of reduced hours for some staff. Two members of staff (whose workload will be more variable over the coming months) will no longer be employed by the PRP. Given the desirability and stated intention to retain expertise and knowledge within the organisation we intend to retain services on a "preferred supplier" basis given both members of staff will be working for a number of organisations on a self employed basis.
9. As set out in the PRP's procurement policy, we may select a preferred supplier directly where the service required:
 - is highly specialist and we cannot identify potential alternative suppliers;
 - is highly commercially confidential and we do not wish to release information about our need for the service to the market; and extends or relies on knowledge from a relevant previous collaboration with one particular supplier.In these cases, we will take reasonable steps to establish that the supplier's costs are acceptable e.g. by comparing with day rates from other similar businesses where this is practicable and record and retain that information in the form of a file note.
10. JS2 Ltd will be in attendance at the meeting to answer any detailed questions about the format that Board Members may have.
11. The Board is invited to **note** the latest position regarding the Panel's finances.

Devolved Nations

12. There are no specific implications/differences in relation to the areas of work covered in this paper and the devolved nations.

Communications

13. There are no specific communications implications to draw out.

Risks

14. A robust and defensible position in relation to the Panel's finances is required in order to avoid reputational damage and to ensure compliance with *Managing Public Money*.

Recommendations

15. The Board is asked to **note** the latest financial position.

Timeline for future work

16. JS2 Ltd will continue to provide updates on the Panel's financial position at meetings of the Board.

Attachment

Annex A – Management accounts as at 28 February 2017

Press Recognition Panel

MANAGEMENT ACCOUNTS

11 Months to February 2017

Press Recognition Panel
Period ended 28 February 2017

	Feb-17		Mar-16	
	£	£	£	£
Current Assets				
Current account	93,180		35,458	
Deposit account	223,304		1,932,826	
Barclays account	1,003,585		5,000	
Cash at bank		1,320,069		1,973,284
Prepayments	10,926		18,222	
Other debtors	-		1,521	
Third Party Deposit	12,530		14,194	
Sundry debtors		23,456		33,937
Creditors: amounts falling due within one year				
Trade creditors	3,236		9,952	
Credit card	-		1,064	
Social security and other taxes	13,048		13,390	
Pensions	2,310		-	
Sundry creditors and accruals	9,710		28,743	
		28,304		53,149
Net Current Assets		1,315,221		1,954,072
Funds brought forward				
Funds at 31 March 2016		1,954,072		730,710
Surplus/(deficit) for the period to date		(638,851)		1,223,362
		1,315,221		1,954,072

Press Recognition Panel
Period ended 28 February 2017

	11 Months to February 2017			Full year to March 2017	
	Actual	Nov 16		Budget	Nov 16 Forecast
		£	Forecast		
	£	£	£	£	£
Income					
Bank Interest	4,091	3,655	436	2,400	3,855
Total Income	4,091	3,655	436	2,400	3,855
Expenditure					
Board costs					
Board Salaries & NIC	59,744	59,745	(1)	66,024	65,422
Board Travel & Subsistence	305	264	41	1,200	314
Total Board Costs	60,049	60,009	40	67,224	65,736
Communications					
Consultation Events & Launch	-	-	-	6,000	-
Consultation Document & Translation	14,673	9,261	5,412	28,950	10,561
					Additional costs of State of Recognition including reprinting
Website & Visuals	6,344	7,271	(927)	5,784	7,517
Total Communications Costs	21,017	16,532	4,485	40,734	18,078
Other costs					
Salaries & NIC	390,449	383,563	6,886	393,788	406,791
					Anticipated reduction in staffing costs delayed due to current workload
HR & Recruitment	9,157	22,586	(13,429)	26,864	23,233
					Contingency recruitment costs not incurred
Serviced and Virtual Offices	86,561	86,520	41	111,912	94,060
Meeting rooms	6,614	7,296	(682)	8,886	7,961
Travel & Subsistence	86	460	(374)	1,800	560
Information Technology	6,257	6,487	(230)	3,812	7,038
IT hardware	-	-	-	1,200	1,200
Audit & Accountancy	25,663	24,511	1,152	44,208	42,603
					Additional costs of electronically tagging annual accounts for HMRC purposes
Printing & Stationery	9,951	9,677	274	9,280	9,962
Insurance	5,784	5,762	22	9,368	8,872
Legal	14,520	8,400	6,120	30,000	20,000
					£6,120 additional costs on Counsel fees relating to Judicial Review
Subscriptions & publications	5,459	5,388	71	4,512	6,020
Finance Charges	197	205	(8)	300	230
Sundry expenses	1,178	1,188	(10)	1,800	1,338
	561,876	562,043	(167)	647,730	629,868
Total Expenditure	642,942	638,584	4,358	755,688	713,682
(Deficit) for the period	(638,851)	(634,929)	(3,922)	(753,288)	(709,827)
Reserves Bfwd	1,954,072	1,954,072		1,954,072	1,954,072
Reserves Cfwd	1,315,221	1,319,143		1,200,784	1,244,245



PRESS RECOGNITION PANEL BOARD

ANNUAL GOVERNANCE FRAMEWORK REVIEW

Meeting: 28 March 2017

Status: for approval and decision

Lead responsibility: David Wolfe,
Chair and Susie Uppal,
Chief Executive

Contact details: Caroline Roberts,
Head of Regulatory Affairs

Purpose

1. This paper reviews the third and final tranche of policies in the PRP's governance framework, and recommends revisions as set out at Annex A. It also proposes a draft "Terms and Conditions of Service for Chair and Board Members" as set out at Annex B.

Background

2. At the Board's meeting on 20 December 2016, it was agreed that a review of all policies should be undertaken. The initial policy framework was developed at the time the PRP was established over two years ago. The purpose of the review is to check whether the policies still meet our needs or require amending in any way, and also to identify any opportunities for simplification or consolidation. The first tranche of policies, broadly relating to information and communications, and conduct, were considered at the Board's meeting on 26 January 2017, the second tranche relating to rules and procedures and our approach were considered on 28 February 2017. This paper reviews the final group, including finance, data management, and IT.
3. A separate paper (PRP15(17)) considers our policies on the Board's remuneration and succession

Analysis

4. The third tranche of policies includes all those that broadly relate to finance management and accountability, data management, complaints, and operational matters).

5. For each separate policy, we have considered whether the content is up to date and fit for purpose, whether the content can be simplified in any way, incorporated in another related policy, and / or can be captured better elsewhere.
6. The policies are listed in the following table, with a proposed approach for each, in addition to minor amendments to reflect current executive roles and responsibilities. The policies are detailed in Annex A to this paper, with proposed revisions marked in track changes where appropriate.
7. At the Board meeting on 26 January 2017 it was agreed that policies on Confidentiality, Expressions of Views, Declarations of Interest, Indemnity for Civil Liability should be included in Terms and Conditions for the PRP Board. A proposed draft of these Terms and Conditions is attached at Annex B.

Policy	Proposed revision or approach
Finance (February 2015) Annex A – Pages 1-6	This Policy requires minor amendments as indicated. We also recommend clarifying the purpose of the delegated authority levels, given the CEO's financial accountability for the PRP's budget as Accounting Officer. Suggested wording is included on page 5 of Annex A.
Procurement (September 2015) Annex A – Pages 6-7	We recommend including a preamble to clarify how the financial delegations fit alongside the CEO's financial accountability as Accounting Officer, and also to include requirement for consideration of ethical and sustainability and sustainability considerations in procurement, as agreed at the February 28 Board meeting.
Scheme of delegation Pages 7-10	This Policy requires minor amendments as indicated, also clarification of the Board's role in supporting the CEO as Accounting Officer, and amendment to reflect the CEO's delegated authority to make decisions relating to PRP's structure as reserved matter for Board.
Treasury (March 2015) Annex A – Pages 10-13	Minor amendments as indicated.
Disciplinary Procedures (December 2014) Annex A – Pages 13-16	Minor amendments as indicated
Complaints	Minor amendments as indicated

(January 2015) Annex A – Pages 16-17	
Whistleblowing policy (February 2015 version) Annex A – Pages 17-20	Minor amendments as indicated
Freedom of information (December 2015 version) Annex A – Page 21-24	Minor amendments as indicated
Data Protection Act policy (September 2015) Annex A – Page 24-29	Minor amendments as indicated
Data retention and disposal policy (July 2015) Annex A – Page 29-37	This policy can be simplified as suggested and requires minor amendments as indicated
IT Policy (March 2015) Annex A – Page 37-44	Minor amendments as indicated
Business Continuity (June 2015) Annex A – Page 44-47	Minor amendments as indicated
Health and safety policy (October 2015) Annex A – Page 47- 50	Minor amendments as indicated

Devolved Nations

8. There are no specific issues identified at this stage of the Paper.

Communications

9. The governance policies are published on the PRP's website. As these are reviewed, they will be amended on the website. The Terms and Conditions, once approved could also be published on the PRP's website.

Risks

10. There are significant reputational risks if the Panel does not adopt adequate governance procedures and policies, and maintain and review these on a regular basis.

Recommendations

11. The Board is asked to consider the following recommendations:

- i. The Board's Finance, Procurement, and Treasury policies require amendment to reflect the intended relationship between financial accountability of the board and the CEO as accounting officer, and minor amendments as indicated;
- ii. The Treasury Policy, Scheme of Delegation, and Policies on Disciplinary Procedures, Complaints, Whistleblowing, Freedom of information, Data Protection, Data retention, IT, Business Continuity and Health and Safety and Consultation all require minor amendments as indicated;
- iii. The Board is asked to review the proposed draft Terms and Conditions for Board Members, and recommend amendments.

Finance Policy

Recommendation: minor amendments as indicated, and clarify the purpose of the delegated authority levels, given the CEO's financial accountability for the PRP's budget as Accounting Officer.

1. General

1.1 Established by Royal Charter, the Press Recognition Panel ('the PRP') has been granted funds from the Exchequer that are sufficient to enable the Board to commence its operations and fulfil its purpose for the first three years of operation. The grant of such monies has been made in accordance with the general principles of *Managing Public Money*, which offers guidance on how to handle public funds.

1.2 The Chief Executive is designated as the Accounting Officer for the PRP and is personally responsible and accountable to Parliament for:

- safeguarding the public funds for which she has charge; and
- for ensuring propriety and regularity in the handling of those public funds.

1.3 This document establishes the financial control framework for the PRPPanel. It is set by the Board and is applicable to everyone who works for the PRPPanel, to ensure that the Accounting Officer can undertake her duties in accordance with the law and *Managing Public Money*, in order to achieve probity, accuracy, economy, efficiency and effectiveness. Failure to comply with the Finance Policy could result in disciplinary action.

2. Roles, responsibilities and delegation

2.1 The Accounting Officer exercises financial supervision and control by:

- c. defining specific financial responsibilities;
- d. agreeing the financial strategy; and
- e. defining and approving financial procedures and systems.

2.2 The Accounting Officer is personally accountable to Parliament for the stewardship of the PRPPanel's funds, for the good management of the organisation, and for ensuring that the PRPPanel meets its obligation to undertake its role and functions within the financial limits set. The Accounting Officer is responsible for signing off the PRPPanel's annual report and accounts.

2.3 The Accounting Officer will, as she deems appropriate, delegate detailed responsibilities to other staff (in writing) within an approved scheme of delegation.

2.4 The Accounting Officer must ensure that all of the Board and staff are notified of and understand their responsibilities within these financial procedures.

2.5 The Accounting Officer is responsible for:

- f. implementing the PRPPanel's financial policies and for coordinating any corrective action;
- g. maintaining an effective system of internal control including ensuring that financial procedures and systems are prepared and documented;
- h. ensuring that sufficient records are maintained in order to ensure, with reasonable accuracy, the financial position of the PRPPanel at any time;
- i. preparing a scheme for charging fees to Regulators in relation to the functions of recognition and cyclical review, which will subsequently be approved by the Board and consulted on publicly (the aim of the scheme is that the PRPPanel will recover its full costs in determining applications for recognition and for conducting cyclical reviews as appropriate para 11.3 of the Royal Charter refers); and
- j. ensuring the provision of financial advice to the Board.

2.6 The Accounting Officer is responsible for the procurement of goods and services including:

- k. preparing a procurement policy;
- l. ensuring goods and services are procured in accordance with best practice at the best levels of value for money and with due regard to the proportionate value of goods and services that are being procured.

2.7 Staff are responsible for:

- m. the security of the property of the PRPPanel;
- n. avoiding loss;
- o. exercising economy and efficiency in the use of resources;
- p. conforming with the requirements of this policy, any limitations on delegation of authority to them and financial policies and procedures;
- q. ensuring that budget allocations are not overspent and that planned and actual expenditure takes full account of the need to achieve value for money in terms of efficiency, effectiveness and economy;
- r. ensuring that potential significant variations from profiled budgets are drawn to the attention of the Chief Executive so that she, and the Board if appropriate, can consider whether the available resources can be used cost-effectively to further the work of the PRPPanel or to determine what additional action needs to be taken; and
- s. preventing, reporting and detecting fraud and corruption and ensuring that all PRPPanel colleagues share this responsibility.

3. Financial Systems

3.1 The Accounting Officer is responsible for the maintenance of appropriate financial systems in order to allow the Chair and Board to carry out their financial obligations. The financial systems must be properly described and kept updated.

3.2 The Accounting Officer will ensure maximisation of separation of duties so that individuals are protected from exposure to undue influence, unfair criticism or allegation.

3.3 The Accounting Officer will ensure that suitable back-up arrangements and/or reserve facilities are in place and that when required they can be invoked with sufficient speed to ensure that the operation and integrity of the services are maintained.

4. Business planning, budgets, budgetary control and monitoring

4.1 The Accounting Officer will compile and submit to the Board for consideration, an annual proposed budget to finance the activities in the PRPPanel's work plan.

4.2 The Accounting Officer may delegate the management of a budget to permit the performance of a defined range of activities. This delegation must be in writing and be accompanied by a clear definition of: the amount of the budget; the purpose(s) of each budget, individual responsibilities and the provision of regular reports.

4.3 The Finance Director (or equivalent) will devise and maintain systems of budgetary control and expenditure forecasting.

4.4 Budget holders are responsible for ensuring that expenditure is kept within budget. If budgets are exceeded then the reasons for this should be reported to the Accounting Officer, together with any proposed remedial action.

4.5 In accordance with para 11.9 of the Royal Charter, the Chair has appointed one Board Member to take specific responsibility for reporting to the Board on the management of the finances of the PRPPanel. Harry Rich was appointed to undertake this role at the Board's 18 December 2014 meeting. The Finance Director (or equivalent) will meet the Board Member on a quarterly basis to discuss the Panel's finances in detail. The Accounting Officer will also attend these meetings.

5. Annual accounts

5.1 The financial year for the PRPPanel is the period from 1 April to 31 March each year (in the first year of operation, the financial period is 3 November 2014 to 31 March 2015). The ~~Finance Director (or equivalent)~~Accounting Officer will prepare annual accounts for each financial year in accordance with the *Financial Reporting Manual* issued by HM Treasury.

5.2 In accordance with Royal Charter, the Board ~~must prepare a statement of accounts for each financial year, and must~~ must send a copy of the statement to the Comptroller and Auditor General (C&AG) as soon as practicable after the end of the financial year (para 12.2).

5.3 In accordance with any necessary arrangements made between the Comptroller and Audit General and the Press Recognition Panel, the C&AG will examine, certify and report on the statement each year (para 12.3). The PRPPanel is required to lay a copy of the certified statement and the C&AG's report ~~to be laid~~ before Parliament (para 12.4).

6. Banking Arrangements

6.1. The Accounting Officer is responsible for managing the PRPPanel's banking arrangement within the parameters set by the Board.

6.2 The PRPPanel is able to earn any interest on its balances – a separate policy for treasury management ~~will~~ has been developed.

6.3 All payments for invoices, for the salaries and expenses of staff and for the salaries and expenses of the Board will be paid by way of the Banking Automated Clearing Service (BACS). Adequate control mechanisms must be in place with the maximum practicable separation of duties for each payment mechanism.

7. Payroll

7.1 The Accounting Officer is responsible for managing the payroll including making payments on agreed dates.

7.2 The ~~Finance Director (or equivalent)~~Accounting Officer must be satisfied that proposed payments are supported by appropriate contractual evidence which have been appropriately authorised before confirming payment of the proposed payroll. The Finance

Director (or equivalent) will carry out such periodic checks to ensure that on-going payments are correct and due and these should be evidenced.

8. Delegation of authority

8.1 The Accounting Officer will determine the level of financial delegation to budget holders, within the overall scheme of financial delegation approved by the Board (attached at Appendix 1).

8.2 The limits are in respect of individual transactions within the budget and apply to authority to commit expenditure against the budget and to enter into formal contracts (as opposed to being centred on payments). The limits will be reviewed each year and agreed before the start of the year to which they relate. The limits apply to designated roles and therefore any changes to role holders do not require individual re-authorisation.

8.3 The ~~Executive Administration Manager Finance Director~~ (or equivalent) will maintain an up to date record of authorised signatures and financial authorities on behalf of the Accounting Officer.

9. Procurement

9.1. The ~~PRP~~Panel is committed to achieving value for money, in terms of quality and price, for all of its procurement activity. In order to achieve this, the ~~PRP~~Panel will endeavour to clearly communicate its requirements and evaluation criteria, as an informed purchaser, and to establish levels of competition appropriate to the size and complexity of the purchase in accordance with the procurement policy.

10. Payment of invoices

10.1 The Accounting Officer is responsible for ensuring that a system of verification, recording and payment of all amounts payable is in place. The system shall provide for certification that the goods or services invoiced were supplied in the time and manner and to the standard ordered before correct payment is made.

10.2 All properly authorised and approved invoices should be routinely paid within supplier terms or 30 days of receipt unless a longer payment term has been agreed or there is a dispute. The ~~PRP~~Panel will aspire to pay all properly authorised and approved invoices within 10 working days; the ~~PRP~~Panel abides by the provisions of the *prompt payment code*.

10.3 Budget holders are responsible for ensuring that invoices received for checking are returned promptly to the ~~Finance Director (or equivalent)~~Accounting Officer.

10.4 The ~~Finance Director (or equivalent)~~Accounting Officer will ensure that payments are made to creditors by way of the Banking Automated Clearing Service (BACS). Adequate control mechanisms must be in place with the maximum practicable separation of duties for each payment mechanism.

11. Management and Disposal of Fixed Assets

11.1. The Finance Director (or equivalent) is responsible for maintaining an asset register of all capital assets leased or owned by the Panel. In addition the Finance Director (or equivalent) will ensure that an inventory is maintained of all valuable, attractive and/or portable assets that belong to the ~~PRP~~Panel.

12. Internal Audit

12.1 The ~~PRP~~Panel's Audit and Risk Committee has determined that an internal audit service is not currently required, and this position is being kept under review.

13. External Audit

13.1 The National Audit Office (NAO) conducts the PRPPanel's annual external audit in accordance with International Standards on Auditing (UK and Ireland) (ISAs (UK and Ireland)), so as to enable the Comptroller and Auditor General to give an opinion on the financial statements.

13.2 Further details of the scope of the audit, as well as the NAO's and PRP's respective responsibilities are set out in the letter of engagement, which is available in the correspondence section of the website.

13.3 The Audit and Risk Committee considers an audit planning report from NAO ahead of the start of the external audit each year. This document explains:

- how the NAO, on behalf of the Comptroller and Auditor General, plans to audit the financial statements, including how the NAO will address significant risks of material misstatement to transaction streams and balances;
- the planned timetable, fees and audit team; and
- matters which NAO are required to communicate to the PRP under the auditing standards, including the scope of the audit, respective responsibilities, and how the NAO maintains independence and objectivity.

14. Regularity, propriety and fraud

14.1. Board Members and staff of the PRPPanel have a responsibility for ensuring compliance with Parliamentary requirements on the control of public expenditure and financial regularity and propriety.

14.2 Regularity is the requirement for all spending to accord with the relevant legislation, the relevant delegated authority, and *Managing Public Money*.

14.3 Propriety requires spending to respect Parliament's intentions, conventions and control procedures, including any laid down by the Committee of Public Accounts.

14.4 In dealing with fraud, corruption or other financial irregularity the Chief Executive, as Accounting Officer, is responsible for ensuring that a robust system of internal control is in place within the PRPPanel which includes effective anti-fraud and corruption controls.

14.5 Board Members and staff have responsibility to prevent, report and detect fraud and corruption. The Board will agree a policy covering anti-bribery, money laundering, fraud, theft and corruption.

14.6 Anyone who suspects fraud or other financial irregularity must immediately report the matter to the Accounting Officer. In the event that the matter concerns actions by a Board Member, the report should be made direct to the Chair of the Board. Concerns about the Chair should be made to the Senior Independent Director. The PRPPanel has a separate Anti-bribery, money laundering, fraud, theft and corruption policy which should be referred to as appropriate.

APPENDIX 1

Scheme of financial delegation – ~~delegation of authority by Board to the Executive~~The CEO is the PRP's designated Accounting Officer and holds accountability for the PRP's budget. To support this role, in order to provide adequate scrutiny of financial decisions, the following limits define levels above which financial decisions need to be agreed with the Board.

Limits apply to entering into a contractual obligation for the sums indicated

Authority to incur budgeted resource or capital – per transaction	Annual Budget	£25,000	Nil
Authority to incur unbudgeted resource or capital – per transaction	Annual Budget	Above £5,000 subject to ratification by Board	Nil
Payroll limit – monthly	Annual Budget	£100,000	Nil
Transfers between accounts	Annual Budget	£50,000 ^[1]	Nil
Corporate credit card – monthly limit	Chair – £2,500		Head of Governance Executive Administration Manager – £ 2,55,000

^[1] Agreed at the 21 April 2015 Board meeting

Procurement Policy

Recommendation: include preamble as indicated to clarify how the financial delegations fit alongside the CEO’s financial accountability as Accounting Officer, and include requirement for consideration of ethical and sustainability and sustainability considerations in procurement.

The CEO is the PRP’s designated Accounting Officer and holds accountability for the PRP’s budget. To support this role, the Board has established levels of financial accountability, above which financial decisions need to be agreed with the Board, as set out in the PRP’s Finance Policy.

1. For items under £2,500 purchasing decisions are at the discretion of the Accounting Officer, who is responsible for ensuring value for money
2. For items over £2,500 we will seek three written quotes from suppliers based on a clear specification. Our decision will be based on value for money which might include an unbiased consideration of the following factors:
 - o price;
 - o ability to deliver the required service quality and timescales;

- warranty and guarantees; and
 - experience;
 - reputation
 - sustainability and ethical considerations
3. The written quotes and final recommendation will be shared with the Board Member with specific responsibility on behalf of the Board for finance matters (for information only), and the paperwork will be retained for the audit trail. Where appropriate, we reserve the right to advertise, and selection criteria will be developed against which to assess bids.
 4. In the very unlikely event that we need to procure a very large project valued in excess of €200,000, we will comply with the requirement to advertise in the Official Journal of the European Union. We will seek legal advice as necessary.
 5. We may select a preferred supplier directly where the service required:
 - is highly specialist and we cannot identify potential alternative suppliers;
 - is highly commercially confidential and we do not wish to release information about our need for the service to the market; and
 - extends or relies on knowledge from a relevant previous collaboration with one particular supplier.
 6. In these cases, we will take reasonable steps to establish that the supplier's costs are acceptable e.g. by comparing with day rates from other similar businesses where this is practicable and record and retain that information in the form of a file note.
 7. We will clearly document the circumstances when extending a previously commissioned service with a supplier to carry out a related but distinct piece of work is preferable to re-procuring (this will generally be in circumstances where the time lapse is for a defined period i.e. not more than 6 months from the end of the previous contract).
 8. We will not select a supplier based on the location of a supplier only, or requiring delivery/response within timescales that would restrict the supplier market. Geography may end up being a factor, but it will never be a pre-requisite. We will decide and record what criteria are important to us, to allow us to decide which supplier offers the best value for money.
 9. We will not inadvertently discriminate against small suppliers or those based outside London by proactively looking at smaller suppliers and suppliers based outside of London to ensure the widest range of suppliers.
 10. The final purchasing decision rests with ~~Executive Director~~Chief Executive and/or Board (depending on the level of spend) [1].

Approved by the Board on 22 September 2015

[1] ~~Executive Director~~The Chief Executive Officer's limit is £25,000 for budgeted spend, £5,000 for unbudgeted spend. Unless specific authorisations have been agreed by the Board, levels above this need sign off by the Board.

Scheme of Delegation

Recommendation: minor amendments as indicated, also clarification of the Board's role in supporting the CEO as Accounting Officer, and amendment to reflect the CEO's delegated authority to make decisions relating to PRP's structure as reserved matter for board.

Principles overall

The following principles in relation to delegation are ~~proposed~~to be applied:

- The Board may delegate any of its functions (other than those which the Royal Charter itself requires the whole Board to take) to the Chair, an individual Board Member, a committee or to a member of the executive. Any such delegation will be recorded as a formal resolution of the Board. Regardless of any delegation, the Board remains ultimately accountable for and must take corporate responsibility for action taken.
- The Board delegates to the ~~Executive Director~~Chief Executive Officer, the discharge of all statutory or general legal obligations (such as those arising as an employer or in relation to the Data Protection Act 1998) other than any matter reserved to the Board; and any matter delegated to a committee of the Board. Detail of the delegation of functions ~~will be~~are set out in the scheme of delegation.
- The ~~Executive Director~~Chief Executive Officer, in consultation with the Chair, may delegate the discharge of some of the functions to one or more members of staff. The ~~Executive Director~~Chief Executive Officer will keep a list of such delegations.
- The Board may make delegations or vary, revoke or add to existing delegations. Any delegation made by the Board may be limited or made subject to any conditions, for example, the Board may delegate a function only for a limited period of time or for a particular matter.
- The Board delegates to its committee(s) the discharge of those functions that fall within their respective terms of reference other than any matter reserved to the Board.
- Unless the Board imposes a condition to the contrary, a committee of the Board may delegate the discharge of a function to a sub-committee or a named Board Member or executive, subject to any conditions imposed by that committee.
- The Board authorises the Chair or any named executive to sign contracts or other documents on behalf of the ~~PRP~~Panel.
- The ~~CEO has accountability for the PRP's budget as Accounting Officer. The Board supports the Accounting Officer in this role by overseeing expenditure decisions above~~ authorises the Executive Director to incur expenditure of up to £25,000 of budgeted spend and £5,000 of unbudgeted spend. Sums above this require approval by the full Board.
- The Board may discharge a function itself even though it has delegated the discharge of that function.

Matters reserved to the Board

The Royal Charter provides that the Board shall not delegate the following decisions (paragraph 6.2):

- a decision to recognise or withdraw recognition from a Regulator in accordance with the Scheme of Recognition; and
- a decision to undertake an ad hoc review in accordance with the Scheme of Recognition. Otherwise, the Charter (paragraph 6.1) gives the Board the power to determine and regulate its own procedures.

In accordance with these powers, the following matters are reserved to the Board for decision:

(1) Royal Charter

- A decision to recognise or withdraw recognition from a Regulator in accordance with the Scheme of Recognition.
- A decision to undertake an ad hoc review in accordance with the Scheme of Recognition.
- A proposed amendment to the Royal Charter (which must be ratified by a resolution that has been passed unanimously by all Members of the Board).
- The Scheme for charging fees to Regulators.
- Approving reports relating to any success or failure of the recognition system.
- Approving the annual report about the activities of the Panel – including whether it has granted recognition to, or withdrawn it from a Regulator – prior to the laying of the report before Parliament and the Scottish Parliament.
- Approving use of the Common Seal, including altering the Common Seal and replacing it with a new one.
- Surrendering of the Royal Charter, and subsequently winding up and otherwise dealing with the affairs of the Recognition Panel in a manner which the Panel considers fit.

▪ (2) Organisational Issues

- Approval of the PRPPanel's strategy and forward programme of work.
- Approval of the PRPPanel's communications strategy.
- Approval of the PRPPanel's Equality, Diversity and Inclusion Policy.
- Approval of the annual budget and any material changes to it.
- Approval of the annual accounts.
- Decisions to commence or defend significant litigation.
- Approval of major items of PRPPanel policy that raise new issues of principle.
- Approval of the publication of any PRPPanel public consultation paper and major decisions following that consultation.
- Approval of the PRPPanel's response to any significant external consultation of strategic importance to the Panel.
- Approval of any delegation in accordance with the PRPPanel's governance framework and the variation or rescinding of any such delegation.

▪ (3) Management Issues

- ~~Decisions relating to the PRPPanel's executive structure.~~
- Determining the remuneration strategy.
- Approval and strategic monitoring of health and safety policies.
- Oversight of the capability/capacity of the PRPPanel to meet its statutory objectives.
- General oversight of the discharge by the executive of PRPPanel's business.

- Contractual and Other Obligations with Third Parties.
- Approval of contracts in the ordinary course of business above £25,000.
- Approval of any memorandum of understanding or formal agreements of strategic importance that the PRPPanel may enter into with a third party.

(4) Financial Reporting and controls

1. Review performance against the PRPPanel's strategy, objectives and budget and ensuring any corrective action is taken.

(5) Board Membership and other appointments

Appointment or removal of Board Members.

Appointment to or removal from committees including identification of the chair and the payment of such remuneration and allowances to any person who is a member of a Board committee but who is not a Board Member.

(6) Delegation of Authority

Approval of terms of reference of Board committees.

(7) Governance

The undertaking of regular reviews of the performance of the Board and Board committees.

Approval and review of the governance framework other than technical changes which may be signed off by the Chair.

Approval and review of this schedule of matters reserved for Board decision

(8) Legal

Anything that is by law reserved to the Board.

Treasury policy

Recommendation: minor amendments as indicated

Scope

This policy applies to the investment of all funds of the Press Recognition Panel (the PRPPanel).

The PRPPanel is required to maintain a minimum accessible cash reserve in order to provide a cushion against the impact of unforeseen payments. All remaining balances arising from the management of cash flow will be invested in approved investment institutions to maximise investment earnings. The institutions must be subject to the Financial Conduct Authority (FCA) regulations.

The investments will be managed by the Finance Director (or equivalent), or another officer appointed by the PRPPanel to act as Investment Officer, who will strive to invest with the judgement and care that prudent individuals would exercise in the execution of their own affairs, to maintain the safety of principal, maintain liquidity to meet cash flow needs and to provide competitive investment returns for the PRPPanel.

From time to time investments may be managed through external professionals. These must be managed in a manner consistent with this policy.

Security

The security of the principal is the foremost objective of all investments. Investments will be managed in a manner that seeks to ensure the security of capital.

Credit Risk

The PRPBoard will minimise:

credit risk; and

the risk of loss due to the failure of the financial institution

by dealing only with financial institutions, brokers/dealers, intermediaries, and advisors who are regulated by the Financial Conduct Authority.

Interest Rate Risk

The PRPPanel will minimise the risk of interest bearing investment redemption penalties by planning the maturity of deposits so that they meet the cash flow requirements for day to day operations avoiding the need to cash in prior to maturity.

Currency Risk

The PRPPanel will eliminate the risk of loss by investing in the United Kingdom in sterling.

Liquidity

The liquidity of investments will be organised to meet all operating requirements that may reasonably be anticipated. This will be accomplished by structuring the portfolio so that deposit maturity is linked to the cash needed to meet anticipated demands.

Standards of care

Prudence

The Board has authority to select any second bank, and the Finance Director (or equivalent) Chief Executive Officer has authority to manage any transactions between the savings and deposit accounts. Investments will be made with judgement and care for investment and not for speculation, and reflect the security of capital as well as the income expected. The PRPPanel recognises that no investment is totally free from risk.

Any person delegated responsibility by the PRPPanel who acts in accordance with written procedures and this investment policy will be relieved of personal liability for the performance of these investments.

Ethics and conflicts of Interest

Individuals involved in the investment process must avoid any activity that might conflict with the proper execution and management of the investments, or that could impair their ability to make impartial decisions. Employees and investment officials must disclose any material interests in financial institutions with which they conduct business.

Delegation of Authority

Authority to manage the investments is delegated to the ~~Finance Director~~Chief Executive Officer or another officer specifically appointed by the ~~PRP~~Panel who will act in accordance with this investment policy. No person may engage in an investment transaction except as provided under the terms of this policy. The ~~Finance Director (or equivalent)~~Chief Executive Officer will be responsible for establishing controls to regulate the activities of other officials to whom this function is delegated by the Board.

Checks and balances

The following guidelines have been established to enhance the integrity and transparency of the Panel's internal procedures for investing the Board's funds and for accounting for those investments.

Any designated officer acting as Investment Officer(s) will be authorised, under the Scheme of Delegation for Financial Management, to transact investment business on behalf of the Board.

All investment confirmations will be sent directly to the ~~Finance Director (or nominated deputy)~~Chief Executive Officer where transaction details will be compared and verified against internal records. The Finance Director (or equivalent) will review all investment transactions subsequent to execution. All journal entries relating to investments will be countersigned by the ~~Executive Director~~Chief Executive Officer, on the basis that she has not been involved in conducting the transaction.

Investment transactions

Internal Controls

The Finance Director (or equivalent) is responsible for establishing and maintaining an internal control structure that will be reviewed annually with the Panel's external auditors. The internal control structure will be designed to ensure that the assets of the Board are protected from loss, theft or misuse and to provide reasonable assurance that these objectives are met. The concept of reasonable assurance recognises that the cost of control should not exceed the benefits.

Eligible Investment

The following list represents the current range of investments which are authorised for the investment of funds.

Deposits – The Board may invest funds regulated by the FCA to meet short-term liquidity needs in instant access saving accounts and in term deposits. The maturity of these will vary to coincide with expected cash demands.

Bonds – The Board may only invest in Bonds which are issued by the UK government and purchased on the Stock Exchange or directly from the Treasury. Bonds may also be purchased through authorised dealers and banks.

Shares or other securities – The Board will not invest in either public or private equity or other securities.

Investment Restrictions and Prohibited Transactions

The investment of the ~~PRP~~Panel's funds will be subject to the following restrictions:

- Borrowing for investment purposes is prohibited.
- Investing in shares or other securities is prohibited.
- Investment in any instrument, which is commonly considered a “derivative” investment (e.g. options, futures, swaps, caps, floors, and collars), is prohibited.

Performance Review and Reporting

The ~~Finance Director (or equivalent)~~Chief Executive Officer will prepare an annual investment report for Board Member with responsibility on behalf of the Board for financial matters that will provide an analysis of current investments and transactions over the reporting period. The report will include a listing of individual investments held at the end of the reporting period. The report will be presented to the full Board annually.

Record Keeping and Safekeeping

The ~~Finance Director (or equivalent)~~Chief Executive Officer will be responsible for ensuring all investment transactions are recorded and for securing all documents relative to such transactions.

Policy Considerations

The ~~Finance Director (or equivalent)~~Chief Executive Officer will review the Investment policy periodically and recommend all necessary changes to the Board Member with responsibility on behalf of the Board for financial matters, and for onward approval by the full Board.

Disciplinary procedures for Chair and Board Members

Recommendation: minor amendments as indicated

Introduction and scope

1. The Royal Charter provides (para 6.2) that:
 - ‘If the Board is satisfied (which shall require a majority of two thirds of the Members entitled to vote to concur), that a Member is unwilling, unable or unfit to discharge the functions of a Member of the Board under this Charter, that Member shall be duly dismissed and notified in writing of this fact, together with reasons. The Member concerned shall not be entitled to vote on this matter and the Board may make further provision as to the operation of this paragraph under Article 6 of the Charter.’

2. This procedure has been prepared to give effect to the provision above and has been approved (and will be periodically reviewed) by the Board.
3. This disciplinary procedure is also to be used in the event of an allegation of personal misconduct or impropriety or a suspected breach of duty by the Chair or any other of the Board.
4. In accordance with paragraph 6.1 of the Royal Charter, any Member of the Board may resign by giving notice in writing to the [PRP Panel](#).

Legal representation

5. At any stage of an investigation into allegations made against a Member, the Member is entitled to legal representation. The Member will be reminded of this entitlement to advice at each relevant stage of the procedure. If the Member chooses to be legally represented, he/she must inform the Chair in writing of the name and address of the legal representative.
6. Legal representation will be at the Member's expense. However, depending on the outcome of the investigation, some or all of such costs may be reimbursed at the discretion of the Board.

Procedure for investigating alleged breaches of duty in relation to Members other than the Chair

Preliminary consideration

7. If the Chair becomes aware of issues relevant to this policy relating to a Member, the Chair must:
 - i. inform the Member in writing of the details of the issue and invite him/her to submit written comments within 14 days, or such other period as may be specified; and
 - ii. notify the full Board that he/she has done so.

Following consideration of the Member's written comments, if the Chair is satisfied, on the basis of all the information available to him/her, that any concerns raised are manifestly unfounded, no further action will be taken. The Chair must inform the Member, the full Board and any person who made a relevant allegation of his/her decision.

If the Chair is satisfied, on the basis of all the information available to him/her, that the issue raised is not manifestly unfounded, he/she must immediately write to the Member concerned:

stating that the issue will be investigated;

enclosing a copy of these procedures;

setting a date for the individual to meet the Chair (preferably within 14 days from receipt of the letter); and

informing the individual of his/her entitlement to be accompanied or legally represented at the meeting and at any subsequent stages of the investigation.

Meeting with the Chair

The Chair will meet the Member concerned to discuss the alleged issue and the Chair will then decide the appropriate course of action to be taken. The Member may be accompanied or legally represented at the meeting by a person of his/her choosing.

After the meeting, the Chair, having regard to all relevant factors, including the outcome of any further investigation he/she may consider necessary, will submit a report to the full Board in which he/she may recommend that the Board should take one or more of the following courses of action:

dismiss any allegation and/or end the consideration of the issue;

direct further investigation of any allegation/issue;

suspend the individual's appointment to the Board pending further investigation;

terminate the individual's appointment to the Board; and

direct such other action as the Chair considers necessary.

On the basis of the report prepared by the Chair, the full Board will determine the matter. In accordance with the Royal Charter, the Board's decision shall require a majority of two thirds of the Members entitled to vote to concur. The Member concerned shall not be entitled to vote on this matter.

If the Board suspends the Member's appointment, it may direct whether such suspension is to be with or without remuneration.

If the Member's appointment is terminated, the Member will be notified without delay and in writing, together with reasons for the Board's decision.

Further investigation

If the Board directs further investigation, it may appoint an Investigating Officer. The Investigating Officer may be an official of the PRP or any other person at the Board's discretion.

Subject to any whistleblowing arrangements the PRP has in place, the Investigating Officer may seek any further evidence and interview any person, as he/she considers necessary.

The Investigating Officer must report his/her findings of fact to the Member concerned and invite his/her comments within 14 days, or such other period as may be specified.

At the conclusion of the investigation, the Investigating Officer will report his/her findings together with the Member's comments, if any, to the Board. The Investigating Officer may also make recommendations to the Board.

Notification of decision

After consideration of the Investigating Officer's report and any recommendations and of any comments made by the Member, the Board will determine the matter. The Board's decision shall require a majority of two thirds of the Members entitled to vote to concur. The Member concerned shall not be entitled to vote on this matter.

If the Member's appointment is terminated, the Member will be notified without delay and in writing of this fact, together with reasons for the Board's decision.

At the conclusion of the investigation, the Board may publicly announce its final decision. Any such announcement would normally be brought to the attention of the Commissioner for Public Appointments.

Procedure for investigating complaints made about Members in their professional capacity

If a complaint in relation to the conduct of a Board Member in a professional or personal capacity is made to or by a professional body or prosecuting authority, they should notify the Chair without delay and the matter will be declared at the next Board meeting.

If the Chair considers that the issue is one that potentially falls within the scope of this policy, he/she will act in accordance with the requirements of this policy.

Investigations relating to the Chair

Any allegation or concern relevant to this policy and relating to the Chair should be made to (or may be raised by) a Member of the Board. A nominated Member will inform the Chair of the issue as soon as possible.

Any investigation relating to the Chair will be carried out by an independent person, on the Board's behalf.

The procedures set out in this document will apply, save that references to the Chair in the conduct of the investigation will be substituted by 'the Board' (or any person the Board directs).

Complaints handling policy (about an individual at the Press Recognition Panel)

Recommendation: minor amendments as indicated

Scope

This policy sets out the process to follow if you are not satisfied with the service you have been given by an individual at the Press Recognition Panel. Please note that if you have a complaint about the press, you will need to refer it to the relevant press regulator. If your complaint relates to whether or not a press regulator should be recognised by the [PRPPanel](#), or any other matter relating to decisions taken by the Board, then this is not the policy to apply – please use the one we have for that purpose.

Stage 1

In the first instance, please contact the person that you have dealt with and discuss your concerns directly with them. They will often be in the best position to understand your situation and give you an explanation as to what has happened.

Stage 2

If you are not satisfied with the response you receive, then you can write to our [Chief Executive Officer](#) ~~Executive Director~~, who will call for a full report to see whether you have received fair treatment. Please contact the ~~Executive Director~~ [Chief Executive Officer](#) via [Holly Perry](#) ~~the Executive Administration Manager~~ at sansari@pressrecognitionpanel.org.uk.

Stage 3

If you remain dissatisfied, or your complaint is about the ~~Executive Director~~Chief Executive Officer, you may refer your complaint to the Chair of the Press Recognition Panel, who will review the report prepared for the ~~Executive Director~~Chief Executive Officer and the decisions taken so far. Please contact the Chair via ~~Holly Perry~~the Executive Administration Manager at (~~hperry@pressrecognitionpanel.org.uk~~sansari@sansari@pressrecognitionpanel.org.uk).

If your complaint is about the Chair, you may refer your complaint to the Panel's Senior Independent Director. Please contact the Senior Independent Director via the Executive Administration Manager Holly Perry (~~hperry@pressrecognitionpanel.org.uk~~sansari@pressrecognitionpanel.org.uk).

Timeframes

You should try to make your complaint as quickly as possible. If you are complaining more than 3 months after an incident you should explain why your complaint has been delayed. We will always consider complaints brought within this period but will only consider those outside if good reasons are given for the delay. If you wish to take your complaint to either Stage 2 or Stage 3, however, we will expect you to do so within one month of the original decision.

We will treat your complaint in confidence and will investigate it carefully as quickly as possible. Every effort will be made to send a full and clear reply within 10 working days of your complaint being received. If we cannot investigate your complaint fully within that time, we will let you know and keep you informed of progress.

Whistleblowing Policy

Recommendation: minor amendments as indicated

Making a Disclosure in the Public Interest

Introduction

The Press Recognition Panel ('the PRP') is committed to the highest standards of openness, probity and accountability. An important aspect of accountability and transparency is a mechanism to enable the Board and staff (defined as employees and all those working with and for the PRP Panel) to voice concerns in a responsible and effective manner.

It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. However, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management.

The Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The PRP Panel has endorsed the provisions set out below so as to ensure that no Board Member or member of staff should feel at a disadvantage in raising legitimate concerns. It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or

business decisions taken by the PRPPanel, nor should it be used to reconsider any matters which have already been addressed under other procedures.

Scope

This policy is designed to enable the Board and staff to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy does not apply in the context of recognition activities.

This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation
- Dangers to health and safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

Safeguards

Protection

This policy is designed to offer protection to individuals who disclose such concerns provided the disclosure is made:

in good faith, and

in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

Confidentiality

The PRPPanel will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

Anonymous allegations

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be

considered at the discretion of the PRPPanel. In exercising this discretion, the factors to be taken into account include:

the seriousness of the issues raised;

the credibility of the concern;

the likelihood of confirming the allegation from attributable sources.

Untrue allegations

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

Procedures for making a disclosure

On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

1. Complaints of malpractice will be investigated by the Chief Executive Director Officer unless the complaint is against the Chief Executive Director Officer or is in any way related to the actions of the ~~Executive Director~~ Chief Executive Officer. In such cases, the complaint should be passed to the Chair, who will act as the investigating officer.

4.2. Complaints against the Chair should be passed to the Senior Independent Director, who will act as the investigating officer. Should none of the above routes be suitable or acceptable to the complainant, then the complainant may approach one of the following individuals who have been designated as independent points of contact under this procedure. They can advise the complainant on the implications of the legislation and the possible internal and external avenues of complaint open to them:

Blowing the whistle to a prescribed person

If an individual decides to blow the whistle to a 'prescribed person' rather than their employer, they must make sure that they have chosen the correct person or body for the issue. The Department for Business, Innovation and Skills has published a list of the prescribed persons and bodies who an individual can make a disclosure to. There is also a brief description about the matters that can be reported to each prescribed person:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/398783/bis-15-43-blowing-the-whistle-to-a-prescribed-person-list-of-prescribed-persons-and-bodies.pdf

If there is evidence of criminal activity then the investigating officer should inform the police. The PRPPanel will ensure that any internal investigation does not hinder a formal police investigation.

Timescales

Owing to the varied nature of complaints, which may involve internal investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

Investigating procedure

The investigating officer should follow these steps:

Full details and clarifications of the complaint should be obtained.

1. The investigating officer should inform the individual against whom the complaint is made as soon as is practically possible. The individual will be informed of their right to be accompanied by a representative at any future interview or hearing held under the provision of these procedures.
2. The investigating officer should consider the involvement of the PRPPanel's auditors and the Police at this stage and should consult with the Chair / ~~Executive Director~~Chief Executive Officer.
3. The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
4. A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Chair / Board as appropriate.
5. The ~~Executive Director~~Chief Executive Officer / Chair will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate procedures.
6. The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome. If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Chair, or one of the designated persons described above. If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, the PRPPanel recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons or, where justified, elsewhere.

Freedom of information

Recommendation: minor amendments as indicated

Background

The [PRP Panel](#) is not currently listed within the schedule to the Freedom of Information Act 2000 ('the Act') and so is not a body to which its provisions apply. The Board nevertheless proposes that it will operate as if the provisions of the Act applied to it, including producing and operating a publication scheme and considering and responding to information requests.

The PRP's publication scheme sets out the information that we will routinely make available to the public, and where and when that information will be available.

If the information you seek is not available under our publication scheme, then you can make a request for the information in accordance with the Act. This provides that, subject to certain defined exceptions, any person making a request for information from us is entitled:

- to be informed in writing whether or not we hold information of the description specified in the request; and
- if we do, to have that information communicated to them.

Our intention is to publish a disclosure log containing details of responses to information requests received by the PRP where that information is not routinely published or covered in the publication scheme.

If your request relates to personal information about you, please refer to the PRP's Data Protection Act policy.

Making a request for information

If you want to make a request for information from the PRP, then you should write to us providing:

- your name;
- your return address; and
- a detailed description of the information that you are requesting.

You can submit your request to the PRP's [Head of Governance Executive Administration Manager, Holly Perry Saima Ansari](#) at: sansari@pressrecognitionpanel.org.uk or:

[Holly Perry Saima Ansari](#)
[Head of Governance Executive Administration Manager](#)
Press Recognition Panel
Mappin House
4 Winsley Street
London W1W 8HF

Please direct any request for assistance in completing your request for information to sansari@pressrecognitionpanel.org.uk or 020 3443 7072.

Processing a request

Upon receipt of a request, the PRP will:

- check the request is valid – if further clarification is needed to assist in identifying the exact information required, this will be dealt with immediately upon request;
- enter the request on the PRP's FOI request log;
- send an acknowledgement letter to the applicant;
- generally respond to the request within 20 days (there may be circumstances when we need longer to respond – details are set out below).

Timescales

We will aim to respond to your request for information promptly, and generally within 20 working days from the day after the date on which your request was received.

Extra time may be taken to respond to a request for information where, for example:

- a fee is deemed payable, in which case the response period will be put on hold until the fee is received;
- the request for information is being considered under a disclosure exemption akin to the FOI Act's public interest test, in which case the response period may be extended by a reasonable period. We will tell you within the response period which exemption we believe applies, and we will give you an estimate of the date by which we expect to reach a decision regarding the application of this exemption.

Refusing a request

A requester may ask for any information that is held by the PRP. However, in some cases, there will be a good reason why we will not make public some or all of the information requested. We would normally refuse a request under the following circumstances:

- it would cost too much or take too much staff time to deal with the request;
- the request is vexatious;
- the request repeats a previous request from the same person;
- the request relates to personal data, and releasing it would be contrary to the Data Protection Act.

While the PRP is not subject to the FOI Act, we have chosen to apply the framework of exemptions set out in the Act to all information requests. The PRP will not classify information as exempt from disclosure unless there are very clear arguments for doing so. Some exemptions relate to particular types of information, for instance, information relating to the development of policy. Other exemptions are based on the harm that would arise or would be likely arise from disclosure, for example, if disclosure would be likely to prejudice a criminal investigation or prejudice someone's commercial interests.

Below is a list of exemptions that are most likely to be relevant to the information the PRP holds:

1. Information accessible by other means (FOI Act section 21 exemption)
2. Personal information (FOI Act section 40 exemption)
3. Information provided in confidence (FOI Act section 41 exemption)
4. Information intended for future publication (FOI Act section 22 exemption)
5. Investigations and proceedings conducted by a public authority (FOI Act section 30 exemption)
6. Prejudice to the effective conduct of public affairs (FOI Act section 36 exemption)
7. Legal professional privilege (FOI Act section 42 exemption)

8. Commercial interests (FOI Act section 43 exemption)

Exemptions 1 to 3 above are absolute, and we will not apply a test akin to the FOI Act 'public interest test'. However, the majority of the FOI Act exemptions require public bodies to conduct a 'public interest test' meaning that the public interest arguments will be considered before deciding whether or not to disclose information. The PRP will adopt a similar approach in assessing requests for information, which might mean the PRP disclosing information in spite of an exemption, where it is in the public interest to do so.

Where the PRP refuses all or any part of a request, we will send the requester a written refusal notice. We will issue a refusal notice if we are either refusing to say whether or not the information is held at all, or confirming that information is held but refusing to release it.

Consultation with third parties and transferring requests

We may need to consult third parties in order to reach a decision about whether or not the requested information can be released.

If you wish to be notified before we consult a third party about your request for information, you should state this in your application.

If you have made a request for information that we believe is held by another public authority, it may be appropriate for you to submit a new request directly to that public authority. Alternatively, we may transfer your request to that public authority. Where we decide that it is appropriate to transfer your request to another public authority, we will first check that it holds the information that you have requested.

If you wish to be notified before we transfer your request for information to another public authority, you should state this in your application.

Fees

Although the PRP is a wholly independent body, its funding is via Exchequer grant. We will charge a fee for complying with a request for information in accordance with The Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004.

If the cost of locating, retrieving and extracting the information is £450 or less, we may charge only for disbursements including photocopying, printing and postage costs, if at all. If the cost is more than £450, we may choose not to comply with your request. However, we will consider whether it is possible to provide any information within the cost ceiling of £450. We will also consider whether it is reasonable to answer your request and charge an appropriate fee.

You will be notified in advance about any fee that you must pay to the PRP.

Complaints procedure

If you are dissatisfied with the response to your request for information (including any decision to charge a fee), you are invited to discuss the response directly with the ~~Head of Governance~~[Executive Administration Manager, Holly Perry](#)[Saima Ansari](#) using the contact details above.

However, if this informal discussion does not resolve your complaint, then you should submit your complaint in writing to the PRP's ~~Executive Director~~[Chief Executive Officer](#):
suppal@pressrecognitionpanel.org.uk or:

Susie Uppal
~~Executive Director~~Chief Executive Officer
Press Recognition Panel
Mappin House
4 Winsley Street
London W1W 8HF

The ~~Executive Director~~Chief Executive Officer will consider your complaint, and will confirm, reverse or amend the decision. You will be advised in writing of the outcome of your complaint.

If you are dissatisfied with the ~~Executive Director~~Chief Executive Officer's decision, then you should direct your complaint to the Chair of the Board, Dr David Wolfe QC:

Dr David Wolfe QC
Chair
Press Recognition Panel
Mappin House
4 Winsley Street
London
W1W 8HF

As the PRP is not subject to the Act, there is no right of complaint to the Information Commissioner.

Further information

The Information Commissioner is responsible for promoting good practice and ensuring compliance with the Act. While the Information Commissioner does not have jurisdiction in relation to the PRP because we are not a body to which the FOI provisions apply, the Information Commissioner's Office is nevertheless the leading source of guidance about the Act:

The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

T: 08456 30 60 60 or 01625 54 57 45

W: <https://ico.org.uk>

Data Protection Act policy

Recommendations: minor amendments as indicated

The Press Recognition Panel (PRP) is required to maintain certain personal data about living individuals for the purposes of satisfying operational and legal obligations. The PRP recognises the importance of the correct and lawful treatment of personal data.

The Data Protection Act 1998 (DPA) aims to strike a balance between the rights of individuals to privacy and the ability of organisations to use personal information for the purposes of their business.

The types of personal data that the PRP holds will include information about current, past and prospective Board members and staff, those working on behalf of the PRP i.e consultants, external committee members; press regulators; suppliers and others with whom we communicate. This personal data, whether it is held on paper, on

computer or other media, will be subject to the appropriate legal safeguards as specified in the Data Protection Act 1998.

The PRP fully endorses and adheres to the eight principles of the DPA. These principles specify the legal conditions that must be satisfied in relation to obtaining, handling, processing, transportation, and storage of personal data. Board Members, staff and those working on behalf of the PRP who obtain, handle, process, transport and store personal data for the PRP must adhere to these principles.

Purpose and scope

The purpose of this policy is to outline the key measures that need to be taken in order to adhere to the eight principles of the DPA. This policy applies to all employees of the PRP and any others who obtain, handle, process, transport and store personal data for the PRP.

Data protection principles

In processing information the PRP complies with the requirements of the Data Protection Act 1998, the Human Rights Act 1998, and common law on duty of confidentiality. The PRP complies fully with the Data Protection Act 1998, and its eight principles when processing personal data. The principles say that personal data must be:

- processed fairly and lawfully and in line with specific conditions set out in the DP Act;
- processed for a specific purpose or purposes;
- adequate, relevant and not excessive;
- accurate and up to date;
- not kept for longer than is necessary;
- processed in accordance with the data subjects rights;
- secure;
- not transferred to a country outside the European Economic Area that does not have adequate data protection rules.

Fair and lawful

The PRP ensures that we tell people what we do with the information that we hold about them. The data subject should be told:

- who the data controller is (i.e. the PRP)
- the purpose or purposes for which the data is to be processed;
- any other information to make the processing fair for example, this could be information about third parties to whom the data may be disclosed.

Personal data processing may only take place if specific conditions set out in the DPA are met. For processing sensitive personal data there are additional, more stringent conditions to fulfill.

Conditions particularly relevant to our business might be: when we have the data subject's consent; when processing information is necessary for us to carry out our obligations under the Royal Charter; and when it is necessary for the exercise of public functions.

Specified purpose

The PRP will only use the personal data we have collected for the purposes we have stated both in our notification to the Information Commissioner and those that we have told the data subject when we collected the information. If we have gathered information for one specific purpose we cannot use the same information for another purpose. If any new processing is proposed, the ~~Executive Director~~Chief Executive Officer should be consulted to check whether this is compatible with the original purpose.

Adequate, accurate and kept no longer than necessary

We collect sufficient personal data or sensitive personal data to enable us to carry out our work, and no more. We use our best endeavours to ensure that the records we keep are accurate and up to date.

Data subject rights

A data subject has certain rights conferred under the DPA including the ability to request access to his or her personal data; and preventing processing likely to cause damage or distress.

Security

The PRP takes appropriate technical, physical and organisational measures to ensure that our information is held securely and safeguarded from destruction, loss, unauthorised access and disclosure.

Transfer of personal data

We do not foresee that there will be circumstances when we would need to transfer data outside of the EEA.

Satisfaction of principles

In order to meet the requirements of the principles, the PRP:

- observes fully the conditions regarding the fair collection and use of personal data;
- meets its obligations to specify the purposes for which personal data is used;
- collects and processes appropriate personal data only to the extent that it is needed to fulfil operational or any legal requirements;
- ensures the quality of personal data used;
- applies strict checks to determine the length of time personal data is held;
- ensures that the rights of individuals about whom the personal data is held, can be fully exercised under the Act;
- takes appropriate technical and organisational security measures to safeguard personal data;
- and ensures that personal data is not transferred abroad without suitable safeguards.

Responsibilities

All Board Members, staff and those working on behalf of the PRP are responsible for:

- checking that any personal data that they provide to the PRP is accurate and up to date;

- o informing the PRP of any changes to information which they have provided, e.g. changes of address;
- o checking any information that the PRP may send out from time to time is accurate;
- o if, as part of their responsibilities, staff and those working on behalf of the PRP collect information about other people (e.g. about personal circumstances which would contain sensitive personal data), they must comply with the DPA.

Data Security

The need to ensure that data is kept securely means that precautions must be taken against physical loss or damage, and that both access and disclosure are restricted. All Board Members, staff and those working on behalf of the PRP are responsible for ensuring that: any personal data which they hold is kept securely; and, personal information is not disclosed either verbally or in writing or otherwise to any unauthorised third party. *Please refer to the PRP Information Technology policy*

Sensitive Personal Data

Sensitive personal data means personal data consisting of information relating to:

24. the racial or ethnic origin of the data subject,
- o his/her political opinions,
 - o his/her religious beliefs or other beliefs of a similar nature,
 - o whether he/she is a member of a trade union,
 - o his/her physical or mental health or condition,
 - o his/her sexual life
 - o the commission or alleged commission by him/her of any offence, or
 - o any proceedings for any offence committed or alleged to have been committed by him/her, the disposal of such proceedings or the sentence of any court in such proceedings.

Rights to access information

Subjects of personal data held by the PRP, including Board Members, staff, those working on behalf of the PRP, have the right to:

- o be told whether any of their personal data is being processed;
- o be given a description of the personal data, the reasons it is being processed, and whether it will be given to any other organisations or people;
- o be given a copy of the information comprising the data; and given details of the source of the data (where this is available).

These rights are subject to certain exemptions which are set out in the Data Protection Act. Any person who wishes to exercise this right should make the request in writing to the PRP's ~~Head of Governance~~ Executive Administration Manager.

The PRP reserves the right to charge the maximum fee payable (currently £10.00) for each subject access request. If personal details are inaccurate, they can be amended upon request.

The PRP aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 calendar days of receipt of a request and appropriate payment unless there is good reason for delay. In such

cases, the reason for delay will be explained in writing to the individual making the request.

Complaints procedure

If you are dissatisfied with the PRP's response to your request for information (including a decision to charge a fee) you may discuss the decision with the [Executive Administration Manager](#).

If informal discussion does not resolve your complaint, you may submit your complaint in writing to the PRP's ~~Executive Director~~[Chief Executive Officer](#), either by email to suppal@pressrecognition.org.uk or by post to the following address:

~~Executive Director~~[Chief Executive Officer](#)

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

The ~~Executive Director~~[Chief Executive Officer](#) will consider your complaint, and will confirm, reverse or amend the decision. She will advise you in writing of the outcome of your complaint. The PRP Board will be notified of any complaints received.

If you are dissatisfied with the ~~Executive Director~~[Chief Executive Officer](#)'s decision, you have the right to apply to the Information Commissioner for a decision as to whether the PRP has dealt with your request for information in accordance with the requirements of the DPA. An application may be made to the Information Commissioner's Office by post to the following address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9 5AF

The Information Commissioner's telephone help line is 08456 306060 or 01625 545745. The ICO's website is www.ico.org.uk. Information on complaints can be accessed at: <https://ico.org.uk/concerns/handling/>

Publication of PRP information

Information that is already in the public domain is exempt from the Data Protection Act. This would include, for example, information on Board Members, staff and those working on behalf of the PRP contained within externally publications such as the annual report and accounts. Any individual who has good reason for wishing details in such publications to remain confidential should contact the PRP's [Executive Administration Manager](#).

Subject consent

If data is sensitive, for example information about health, race or gender, the PRP will obtain individuals' express consent to process data. Processing may be necessary to operate PRP policies, such as health and safety and equality, diversity and inclusion.

Retention of data

The PRP keeps some forms of information for longer than others. All Board Members, staff and those working on behalf of the PRP are responsible for ensuring

that information is not kept for longer than necessary. *Please refer to the PRP Data Retention and Disposal Policy.*

Accountability

The **Chief Executive Officer** has an overall duty to ensure that the PRP complies with legislation affecting the handling of personal data and with supporting regulations and codes. All Board Members, staff and those working on behalf of the PRP are accountable for compliance with this policy and with related policies, standards and guidance. They have a responsibility to handle personal data in accordance with the principles of the DPA. Individual can be liable in law under the terms of the DPA. Deliberate misuse of personal data or a serious breach of DPA may result in disciplinary action being taken.

Consultants and other external parties

The PRP will ensure that consultants and other external parties who contract with us are aware of and comply with the principles of the DPA in the course of the work they undertake for the PRP. The responsibility of consultants and other external parties to comply with the DPA will be made known to them when they begin working for the PRP.

Approved by the PRP Board on 22 September 2015

Data retention and disposal policy

Recommendations: This policy can be simplified and minor amendments incorporated as indicated

Introduction

Effectively managing the information we hold and dispose of is critical to any business' organisational success.

We have to be able to access information in a simple and effective manner and to be able to dispose of information that is no longer relevant to our business needs.

Legal requirements determine that some of the information we hold such as financial records, contracts and HR records must be stored for predetermined time periods.

The length of time we hold other records is determined by us and should be determined on what information we need to keep in order to operate effectively.

This Policy sets out our current position on what to keep and how long it should be kept for. It sets out what electronic information should be kept for business, legislative and historical reasons and what information should be routinely deleted.

Once you have identified a record (see definition of a record below) you need to determine how long you need to keep it and why.

All records should be stored on our ~~Microsoft 365 One~~**Egnyte Shared Drive Sharepoint** Account and not on local hard drives. This is to ensure there is access for all staff to the records required and that records are secure.

The key to ensuring documents can be found easily is to ensure that staff use the file plan structure currently in place. If you need to change this structure you will need to speak to the ~~Head of Governance~~**Executive Administration Manager**.

Retention Schedule

The Retention Schedule set out in Appendix A sets out the minimum length of time that we should retain records. It is designed to ensure we can:

- Find and use the information we need
- Justify our decisions and provide a clear audible trail
- Maintain our corporate memory
- Comply with legislative and regulatory requirements
- Demonstrate that the disposal of information has been carried out according to an agreed policy and not according to the preference of an individual's whim
- Mitigate the cost and potential liabilities associated with retaining information that is not required
- Reduce storage costs and administrative overheads
- Improve the security of our information

The Schedule identifies the functional area, where the record should be saved and for the minimum period the record should be stored. This is referenced where appropriate to the citation for the required retention period.

Destruction/Disposal

~~A set timeframe will be agreed for the automated destruction of e-mails.~~

Paper records containing confidential and or personal information should be shredded securely using the facilities provided.

Electronic versions of documents may only be downloaded onto non PRP devices, if adequate security measures are in place, and they must be deleted as soon as possible.

Further Information

If you are unsure about any aspect of this policy, please contact the Executive Administration Manager~~the Head of Governance~~ for further advice.

What is a record?

How to identify a record	Is it a record?
Does the content of the item contribute to a policy decision or decision making process?	Yes
Does the content of the item contribute to and action taken or a decision made?	Yes
Does the content of the item contribute to a change in our policy or procedure?	Yes
Does the content have financial or legal implications?	Yes

Does the content need to be approved by or reported to another individual or an external body?	Yes
Does it have to be created as a result of specific legislation?	Yes

If it is none of the above criteria apply, it is not a record and can be destroyed when it is no longer required.

Appendix A

Governance processes

What to Keep	Where to save it	When should it be saved	When should it be deleted	Who should action this
Early policy drafts not shared with colleagues	Personal Drive	Immediately	When superseded	Originator
Drafts shared with colleagues for comment	One Drive <u>Egnyte</u>	When access is required	When superseded	Originator
Drafts that have been to Board for discussion	One Drive <u>Egnyte</u>	When approved for discussion with the Board		Head of Governance <u>Executive Administration Manager</u>
Final policy documents	One Drive <u>Egnyte</u>	When approved by the Board	When superseded	<u>Executive Administration Manager</u> Head of Governance
Team meeting <u>agendas</u> , <u>project plans</u> and <u>notes</u>	One Drive <u>Egnyte</u>	Once approved	Review annually	<u>Executive Administration Manager</u> Head of Governance
Board papers, agendas and minutes	One Drive <u>Egnyte</u> and Website	Once approved	Permanent	<u>Executive Administration Manager</u> Head of Governance

Financial Information relating to business operation	One <u>DriveEgnyte</u>	Immediately	6 Years from last action	<u>Executive Administration Manager</u> Head of Governance
Contractual Information (those tendered)	One <u>DriveEgnyte</u>	Immediately	6 Years from termination of the contract	<u>Executive Administration Manager</u> Head of Governance
Annual Plans and Reports	One <u>DriveEgnyte</u>	Once approved	Permanent	<u>Executive Administration Manager</u> Head of Governance
Employers Liability Insurance	One <u>DriveEgnyte</u>	Immediately	Expiry of Policy + 40 years	<u>Executive Administration Manager</u> Head of Governance
Other insurance policies	One <u>DriveEgnyte</u>	Immediately	Expiry of Policy + 6 years	<u>Executive Administration Manager</u> Head of Governance
Claims made under insurance Policies	One <u>DriveEgnyte</u>	Immediately	Permanent	<u>Executive Administration Manager</u> Head of Governance
Legal claims	One <u>DriveEgnyte</u>	Immediately	Settlement of the case + 6 years	<u>Executive Director</u> Chief Executive Officer
Legal advice regarding operational issues	One <u>DriveEgnyte</u>	Immediately	Permanent	<u>Chief Executive Officer</u> Executive Director

Application Process

What to Keep	Where to save it	When should it be saved	When should it be deleted	Who should action this
<u>All relevant documents relating to Applications applications, reviews, and any required</u>	One <u>DriveEgnyte</u>	Immediately	Permanent	Regulatory Manager

<u>actions, and all relevant communications and meeting notes for recognition including all associated support documentation relevant correspondence,</u>				
Correspondence relating to the application	One Drive	Immediately	Permanent	Regulatory Manager
Receipt of Call for Evidence	One Drive	Immediately	Permanent	Regulatory Manager
Investigative results	One Drive	Immediately	Permanent	Regulatory Manager
Cyclical Reviews	One Drive	Immediately	Permanent	Regulatory Manager
Adhoc Reviews	One Drive	Immediately	Permanent	Regulatory Manager
Enforcement Action	One Drive	Immediately	Permanent	Regulatory Manager

Emails

What to Keep	Where to save it	When should it be saved [1]	When should it be deleted	Who should action this
Personal emails	Inbox	Only if needed	Immediately if no longer required	Originator and Recipient
E-mails arranging meetings	Inbox	Depending on content	Once no longer required	Originator and Recipient
E-mails discussing business	Inbox	Immediately	ASAP if no longer required	Originator and Recipient
E-mails reflecting decisions	One Drive	Immediately	Permanently	Originator and Recipient

E-mails received from stakeholders	One-Drive	Immediately	Review annually	Communications and Stakeholder Manager
------------------------------------	-----------	-------------	-----------------	--

~~[1] Zimbra automatically saves all emails for an indefinite period of time. This position will be re-visited once storage space starts to become limited.~~

Information requests

What to Keep	Where to save it	When should it be saved	When should it be deleted	Who should action this
Information requests or complaints received, and our response to these A response to information requested about the way we operate	One Drive Egnyte	Immediately	Review annually	Head of Governance Executive Administration Manager
A response to information requested about a call for evidence	One-Drive	Immediately	Review annually	Head of Governance
A response to a formal complaint about the service we have provided	One-Drive	Immediately	Review annually	Head of Governance
Information requests from the media and others, and the PRP's response	One-Drive	Immediately	Review annually	Head of Governance

~~Projects and research~~

What to Keep	Where to save it	When should it be saved	When should it be deleted	Who should action this
-------------------------	-----------------------------	------------------------------------	--------------------------------------	-----------------------------------

High-profile or innovative projects concerning changes to policy, planning and business	One-Drive	On-completion	Reviewed annually	Head of Governance
High-profile research documents	One-Drive	On-publication	Review annually	Head of Governance
Statistical data relating to business needs and research	One-Drive	Immediately	Review annually	Head of Governance

Human Resources Information

What to Keep	Where to save it	When should it be saved	When should it be deleted	Who should action this
<u>Leaver and joiners forms</u> Annual leave, <u>special leave,</u> <u>Medical and sickness records,</u> <u>termination of employment by resignation, redundancy, retirement or dismissal</u>	HR system	Immediately	Termination of employment + 6 years	Executive Director <u>Chief Executive Officer</u>
<u>Special leave</u>	HR system	Immediately	Termination of employment + 6 years	Executive Director <u>Chief Executive Officer</u>
Performance management, probation and disciplinary, <u>Training and development</u>	HR system	Immediately	Termination of employment + 6 years	Executive Director <u>Chief Executive Officer</u>

Medical and sickness records	HR system	Immediately	Termination of employment + 6 years	Executive Director
Leaver and joiners forms	HR system	Immediately	Termination of employment + 6 years	Executive Director
Annual service performance record	HR system	Immediately	Termination of employment + 6 years	Executive Director
Training and development	HR System	Immediately	Termination of employment + 6 years	Executive Director
Reportable accidents, injuries or deaths in connection with work	HR System	Immediately	Incident + 3 years	Executive Director <u>Chief Executive Officer</u>
Grievances	HR Systems	Immediately	Conclusion of investigation + 6 years	Executive Director <u>Chief Executive Officer</u>
Termination of employment by resignation, redundancy, retirement or dismissal	HR Systems	Immediately	Termination of employment + 6 years	Executive Director

Stakeholders

What to Keep	Where to save it	When should it be saved	When should it be deleted	Who should action this
Contacts Database	One Drive	Immediately	Review annually; delete immediately if requested to do so by an individual	Head of Communications and Stakeholder Management <u>Communication and Stakeholder Manager</u>

Consultation Responses	One Drive	Immediately	Permanently	Regulatory Manager
Correspondence <u>and notes on discussions</u> with interested parties	One Drive	Immediately	Review annually	Head of Governance <u>Head of Communications and Stakeholder Management</u>
Notes of discussion with interested parties	One Drive	Immediately	Review annually	Head of Governance
Diversity Monitoring Forms	One Drive	Immediately	Review annually; delete immediately if requested to do so by an individual	Head of Governance
Statements to the media <u>and press releases</u>	One Drive	Immediately	Permanently	Head of Communications and Stakeholder Management <u>Communications and Stakeholder Manager</u>
Press releases	One Drive	Immediately	Permanently	Communications and Stakeholder Manager

Approved by the Board, 23 July 2015

Information Technology Policy

Recommendations: minor amendments as indicated

Introduction

This policy applies to everyone (including Board Members, staff and contractors) using the Press Recognition Panel's ("PRP's") Information Technology (IT) facilities equipment and systems at the Press Recognition Panel ("PRPPanel") and describes the rules and conduct that the PRPPanel requires you to observe ~~whenever you use its IT systems~~. By IT equipment and systems, we mean telephones, computers connected to the network (including the use of emails and the internet) and any other equipment owned or operated by the PRPPanel that may be used to communicate, store or process information electronically; also all emails and electronic documents sent using a pressrecognitionpanel.org.uk email address or any sent in the course of activities for the PRPPanel using any other email address.

The purpose of this policy is not to prevent, discourage or monitor reasonable usage of IT systems, but rather to set out clearly a code based on mutual trust and an underlying assumption that everyone will use the IT systems fairly and reasonably.

Note: monitoring of usage, whether such usage occurred prior to the introduction of this policy or after its introduction, will not be carried out in the normal course of events: see Annex 1.

The intention is not to impose restrictions that are contrary to the PRP's established culture of openness, trust and integrity. The PRPPanel is committed to protecting its Board Members, employees, consultants and itself from illegal or damaging actions by individuals, either knowingly or unknowingly and this policy is constructed as part of that commitment.

This document outlines the PRPPanel's security policy in relation to the use of IT equipment and systems. The policy has been created after reviewing best practice use and the relevant legislation currently in force and it is designed to ensure that we meet all legal requirements, minimise our exposure to risk, protect our information and utilise the equipment in the most effective manner. Inappropriate use exposes the PRPPanel to risks including virus attacks, compromise of network systems and services and a range of legal issues.

It is vital that everyone at the PRPPanel applies this security policy in full. While the policy does not form part of anyone's contract of employment, all users of IT systems are responsible for ensuring that they are complying with the policy and with any current legislation. Failure to comply with this policy and other guidelines could result in disciplinary action that may lead to dismissal (including termination without notice in cases of serious breaches) and the possibility of prosecution under existing legislation.

Operating principles

The PRPPanel will conform with the relevant legislation in force at the time governing the use and monitoring of e-mails and the internet, which principally involves: the Human Rights Act 1998, the Data Protection Act 1998, the Regulation of Investigatory Powers Act 2000 and the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (S.I. 2000, No. 2699). The PRPPanel has also decided that, whether or not the Freedom of Information Act is extended to cover the PRPPanel's activities, the PRPPanel will behave as if the Act applied to it (including therefore in relation to communications sent using IT systems). All reasonable steps will be taken to inform users about their legal rights under the legislation at the time through the communication of this policy.

Other legislation taken into account in this policy includes the Copyright, Design and Patents Act 1988 and Data Protection Act 1998.

Your use of the Panel's IT

The principal purpose of the IT systems is to facilitate the legitimate business purposes of the Press Recognition Panel. However it is acknowledged that everyone is entitled to means of personal communications during the working day, particularly, but not only, where there is a need to communicate urgently. Personal use of the PRPPanel's IT equipment, as described later in this policy, is allowed, so long as carried out reasonably and appropriately.

Under no circumstances should the IT systems be used to send, receive, browse, download or store material that may be illegal, offensive or cause embarrassment to others. This includes (without limitation) the use of the PRPPanel's IT systems to send, receive, obtain access to, download or store pornographic material and material that is religiously, racially or sexually offensive.

In particular, you may not use the PRP's IT systems to send, or solicit, communication where the content (or any attachment) is pornographic, sexist, racist, homophobic or in any other way unlawfully discriminatory.

It is important to ensure that you and the PRPPanel are protected against the misuse of others' copyright material and that the integrity and effectiveness of the IT systems is maintained. Accordingly, you may not install or update any software not provided or approved by the PRPPanel without the prior permission of the Executive Director/Chief Executive Officer. This does not apply to updates of approved software already installed.

You are responsible for the security of the IT systems assigned to you, and you must not allow them to be used by any other person unless, in the case of staff members, permitted by your manager.

Your system password is unique to you, and must not be made available to any other person, (other than our IT consultants who may need your password for support purposes).

Passwords should be sufficiently memorable so that you can avoid writing them down, but not obvious or easily guessed. The password should be at least 9 characters long and contain three of the four types of keyboard character (upper case, lower case, numbers and symbols – by way of example only – 2014.St0Ne%. It is sensible not to use the same password for all devices.

To ensure compliance with this policy, use of IT systems by staff may be monitored. Such monitoring will not be carried out in the normal course of events and when monitoring does occur it will be in accordance with the practice set out in Annex 1. You should also be aware that others may have access to systems you use, the data stored or may oversee what you are doing.

Staff accept that by using the PRPPanel's IT systems to send or receive e-mails, or to access the internet, that monitoring may take place in accordance with the practice set out in Annex 1. Accordingly it is recommended that any communications carried out by e-mail for communication which are in their nature private or confidential or which may contain sensitive personal data, should be clearly marked "private" in the subject line.

E-mail monitoring will be confined to the address/heading of an e-mail unless there appears (in the view of the Executive Director/Chief Executive Officer) to be a valid and defined reason to examine the content.

In exercising its right to monitor e-mails and internet usage, the PRPPanel will comply with its obligations under the Data Protection Act 1998 and the Regulatory of Investigatory Powers Act 2000. The PRPPanel will also comply with the Information Commissioner's Employment Practices Code in this regard.

Personal use of the PRPPanel's IT Systems

Use of the PRPPanel's IT systems by you to send and receive personal e-mail, to use the internet (including instant messaging services) or to make or receive personal telephone calls is acceptable provided that your usage:

- is kept to a minimum;
- does not interfere with your work;
- does not incur anything more than trivial costs to the PRPPanel; and
- complies with all other PRPPanel policies.

If using social media sites, such as Twitter, it should be clearly stated that any views expressed are those of the individual, rather than of the PRPPanel.

This policy on personal use is dependent upon its not being abused or overused and may be withdrawn or amended at any time and without notice.

PRP computers

All PRPPanel laptops and PCs should use screen savers and wallpaper appropriate to a business environment.

Every individual should ensure that the computer on which they have been working that day is switched off at the end of the working day except when it is necessary for the computer to be left switched on in order to allow remote access/working.

Games should not be played on any computers owned by the PRPPanel.

When using the Internet

You must not use the internet for gambling.

You must not access or attempt to access any internet site or service, or any material on a site, which you know or suspect to be pornographic, illegal or likely (if disseminated) to be offensive to others. If you accidentally access any such site or material you must not save any material from it and must delete any accidentally saved, and must exit the site immediately. All such incidents must be logged and reported to the ~~Executive Director~~Chief Executive Officer.

Personal use of the internet, for example for booking holidays or shopping, should be kept to a minimum and should not, where possible, be in public area.

Be aware that web sites often keep a record of who has visited them, what was requested and from where.

Be aware that your web browser, by design, keeps its own records and copies of what sites you have visited and when.

You may only download files from the Internet where there is a genuine business need to do so. To avoid importing viruses you must run a virus check on all downloaded files prior to opening them.

You should be aware that the PRPPanel could be bound by contracts that are entered into via the Internet. You must not, unless authorised, subscribe to any service via the Internet or commit the Panel to purchase any product or service.

In order to preserve the rights of the PRPPanel to material and information which are its confidential property, no information should be publicised over the Internet or made available without the prior consent of the ~~Executive Director~~Chief Executive Officer.

Do

- Only visit Internet sites that have a relevance to your business interests.
- Ensure that password and access restrictions are in place (do not allow the software to retain the access password).

Don't

- Leave the connection open longer than necessary.

- Download software or files of any type as they can contain instructions to damage the software on your PC.

When using email

Assume that e-mail messages may be read by others and so do not include in your e-mails anything which would offend or embarrass any such reader, or would embarrass the [Panel-PRP](#) if it found its way to the public domain.

You must not use the [PRP](#) 'Panel's facilities to send, or solicit, any e-mail or other message where the content (or any attachment) is pornographic, sexist, racist, homophobic or in any other way discriminatory, harassing or defamatory or which in any way breaches the [PRP](#) Panel's Equality, Diversity and Inclusion Policy. You must immediately delete any e-mail or attachment you receive or access through the Panel's facilities that could be inappropriate.

If a recipient asks you to stop sending them personal messages then always immediately stop.

Never send messages from another person's e-mail account or under a name other than your own without the relevant account user's express permission or, where appropriate.

Never forward confidential messages by e-mail without specific authority from the original sender.

Never open an e-mail attachment from an unexpected or untrustworthy source.

Remember that e-mail messages are documents and so may be disclosed in legal proceedings if relevant to the issues.

Never send or forward private e-mails at work which you would not want a third party to read.

Do not create e-mail congestion by sending trivial messages or unnecessarily copying e-mails to those who do not have a real need to have them.

Do not advertise or forward "chain-mail" e-mails.

Always remember that text, music and other content on the Internet are copyright works. Never download or e-mail such content to others unless you are certain that the owner of such works allows this.

If sending important information by e-mail, always obtain confirmation of receipt (either a reply to your e-mail or by following up with a telephone call).

Never agree to terms or enter into contractual commitments or make representations by e-mail without having obtained proper authority.

When you type your name at the end of an e-mail, this act is just as much a signature as if you had signed it personally.

Never send strictly confidential messages via the Internet, or by other means of external communication which are known not to be secure.

If requested to forward such information over the Internet, make sure that the recipient knows that it is not totally secure and is willing to accept that risk.

Take care not to be taken in by emails falsely appearing to come from someone else associated with the [PRP](#) Panel (particularly where the emails appear to instruct you

to, for example, pay money). If in any doubt, ask the sender to confirm their identity, using another means of communication or similar method.

All email communication concerning PRP business must be done using the pressrecognitionpanel.org.uk email address, the only exception to this is email communications regarding administrative matters such as the scheduling of meetings.

Physical security of electronic devices

Everyone should also take appropriate steps to ensure the physical security of desktop computers, laptops, smartphones, tablets and USB sticks and other removable storage devices that contain confidential material. In particular you should not: leave devices in a car overnight; or leave devices unattended in a public place (although there is no objection to leaving them in a locked court-room during adjournments). Where possible, computers should not be placed so that their screens can be overlooked, especially in public places.

Laptops and other portable devices

Particular risks to confidentiality arise from the loss of Confidential Material held on laptop computers, smartphones, PDAs, USB sticks and other removable storage devices. A single portable device may contain very large amounts of confidential information. The loss of information may cause considerable embarrassment to third parties as well as being a breach of the Data Protection Act. Everyone should take as much care with this material as you would with your own valuables to prevent theft or loss. Everyone should restrict the amount of confidential material stored on portable devices to the minimum. Should a laptop or other portable device become lost or stolen, you should notify the ~~Executive Director~~[Chief Executive Officer](#) immediately so that your login password can be changed and, if possible, the data on your remote devices can be wiped.

Electronic security and encryption

External email increases the risk of importing a virus, not just by downloading of programs but embedding of those viruses within programs such as Word and Excel. A firewall is in place to filter out viruses from external e-mail received via the central email system. However firewalls are not infallible, so any mail received from unknown or unexpected sources should be treated with extreme care. If you have any suspicion that the email you have received could contain a virus, do not open the email. Computers used at home should be protected from unauthorised and unrestricted access by third parties. The Information Commissioner's Office recommends that portable and mobile devices including magnetic media used to store and transmit personal information, the loss of which could cause damage or distress to individuals, should be protected using approved encryption software which is designed to guard against the compromise of information. Wherever practicable therefore, confidential material stored on laptop computers and other portable devices (such as memory sticks, CD-ROMs, removable hard disk drives, smartphones and PDAs) should be encrypted in a reasonably secure manner. The type of encryption that is appropriate will depend on the circumstances.

Communication

E-mail is a potentially insecure method of communication. Appropriate steps, such as encryption during transmission, should be taken if it is considered necessary to send particularly sensitive information by e-mail. You should never send the password

required to decrypt an attachment in the same e-mail as the attachment since this would self-evidently defeat the purpose of encryption to avoid interception. If you arrange for e-mails to be sent to your mobile telephone, smartphone or PDA, you should ensure that the device is suitably password-protected with a nine character password. Connecting to the internet via a (non PRP) wireless network presents a particular risk of interception of communication. Particular care should be taken when connecting via public and unencrypted access points. If you use a wireless network system in your home you should ensure that it is reasonably secure.

Phone calls

Reasonable usage of the PRPPanel telephone system for personal purposes is permitted.

Such usage is based on mutual trust and an underlying assumption that everyone will use telephone system fairly and reasonably.

Personal telephone calls should only be made when necessary and should be kept to the minimum time required.

It is recommended that personal telephone calls should not be taken in any open or communal area.

Failure to comply with this policy

Breach of any of the conditions will be regarded as a disciplinary offence and serious breaches may constitute Gross Misconduct. If you fail to comply with rules and conduct in your use of the PRPPanel's IT systems disciplinary action will be taken that may lead to your dismissal and, if appropriate, civil and/or criminal proceedings.

ANNEX 1

Regulation of Investigatory Powers Act 2000

This Act covers the extent to which organisations can monitor or record communications at the point at which they enter or are being sent within the employer's telecommunications system, and applies to public and private communication networks. It gives the sender or recipient of a communication the right of action for damages against the employer for the unlawful interception of communications.

There are two areas where monitoring is not unlawful. These are:

- where the employer reasonably believes that the sender and intended recipient have consented to the interception
- without consent, the employer may monitor in the following circumstances, as set out in the Telecommunications (Lawful Business Practice)(Interception of Communications) Regulations 2000. These include: – to ensure compliance with regulatory practices e.g. Financial Services Authority requirements – to ensure standards of service are maintained, e.g. in call centres – to prevent or detect crime – to protect the communications system: this includes unauthorised use and potential viruses – to determine the relevance of the communication to the employer's business i.e. picking up relevant messages when someone is away from work.

The Panel will only monitor or record communications in accordance with these provisions. Moreover, the PRPPanel will make all reasonable efforts to ensure that

system users know that communications may be intercepted, and any such monitoring will also comply with the provisions of the Data Protection Act 1998 (see below), and in particular the Data Protection principles on fair processing.

Data Protection Act 1998

The Information Commissioner – responsible for enforcement of the Data Protection Act – has published a code of practice to help employers comply with the provisions of the data Protection Act. The Employment Practices Code clarifies the Act in relation to processing of individual data, and the basis for monitoring and retention of email communications. Part 111 of the Code covers monitoring at work. All are available from the Commissioner at www.dataprotection.gov.uk The code of practice *Monitoring at work: an employer's guide* states that any monitoring of emails should only be undertaken where:

- the advantage to the business outweighs the intrusion into the workers' affairs
- employers carry out an impact assessment of the risk they are trying to avert
- workers are told they are being monitored
- the information discovered is kept secure
- employers are careful when monitoring personal communications such as emails which are clearly personal
- employers only undertake covert monitoring in the rarest circumstances where it is used for the prevention or detection of crime.

The PRP will comply with these principles in deciding when monitoring may be required and in carrying out any such monitoring activity.

Business Continuity Policy

Recommendations: minor amendments as indicated

Definition

Business Continuity Management (BCM) is about identifying those parts of our business that we cannot afford to lose and planning how we would maintain these if an incident occurs.

Implementation

- To implement business continuity, we need to identify:
- our key products and services;
- the critical activities and resources to required to deliver these;
- the critical risks to these activities; and
- how we will maintain these critical activities in the event of an incident (loss of access to premises, loss of utilities etc.)

Objectives and strategy

Our Business Continuity Management Policy aims to ensure that systems and plans are designed to address significant disruptions that might affect our capabilities to perform our day-to-day activities.

These are likely to include

- Loss of staff and Board Members

- Loss of systems
- Loss of access to premises
- Loss of key suppliers
- Disruption to transport

We will identify the critical risks that relate to the above groups and develop ~~Business Continuity Plans for each to ensure that there are plans in place~~ appropriate mitigations to address any major disruption to our services.

We will follow nationally accepted best practice in this area and we will aim to comply with the Business Continuity Management Standard (BS25999).

~~We will also follow the six stages set out in the HM Government Toolkit which provides best practice guidance on preparing for emergencies. This toolkit is attached in Appendix 1.~~

Roles and responsibilities

It is essential that this area of work has the full support of the Board and the Executive.

The following paragraphs set out the key roles the Board and the Executive have for delivering this area of work and ensuring that it is actively managed on an ongoing basis:

The Board will review this policy on an annual basis to ensure we have robust and sensible plans in place.

The ~~Executive Director~~ Chief Executive Officer is responsible for the Business Continuity of the organisation. She will review our Business Continuity Plans and critical risks on an annual basis. As part of this review, the plans will be challenged and tested and updated as required. We will also link this review to a review of our main identified risks to ensure that all the known risks are covered by this process.

Staff will be trained ~~internally~~ as required and the plans that are developed will be developed with the relevant parties.

Corporate standards and guidance

This policy, plans, templates and guidance documents will be stored on our shared office website on ~~Microsoft Office 365~~ Egnyte and updated annually

- ~~Business Continuity Management action plan template~~

Appendix 1 – Business Continuity Management

Service/Product	-
------------------------	---

Impact

First 24 hours	-
24 to 48 hours	-
Up to one week	-
Up to two weeks	-
Maximum Tolerable Period of Disruption (MTDP)	-
Define what activities are required to deliver the service/product	-
Quantify the resources you require to maintain the activities at an acceptable level and meet the RTO. These may include People Premises Technology Information Supplies and Partners The Questions to ask yourself tab sets out some of the questions that you may want to consider when doing this.	-

Questions to ask yourself

People

What is the optimum number of staff you require to carry out your critical activities?
 What is the minimum staffing level which you could provide some sort of service?
 What skills/levels of expertise is required to undertake these activities?

Premises

What locations do we run critical activities from?
 What alternative premises do we have?
 What plant, machinery and other facilities are essential to carry out our critical activities?

Technology

What IT is essential to carry out our critical activities?
 What systems and means of voice and data communication are required to carry out our critical activities?

Information

What information is essential to carry out our critical activities?
 How is this information stored?

Suppliers and Partners

~~Who are our priority suppliers/partners who we rely on for critical activities?
Do we tender key services out to another organisation, to whom and what for?
Do we have any reciprocal arrangements with other organisations?~~

PRP Health and Safety Policy

Recommendations: minor amendments as indicated

The Press Recognition Panel has been set up by Royal Charter to grant recognition to regulators that meet the requirements set out in the Charter's recognition criteria. We will undertake reviews of those regulators, withdraw recognition if a regulator no longer meets the criteria and report on the successes and failures of the recognition system.

We have six Board Members including the Chair, and an executive team, led by Susie Uppal, ~~Executive Director~~Chief Executive Officer.

We are located in services offices which are open Monday to Friday 8.00-6.00. The cleaning is undertaken by the service provider on a daily basis as part of our contractual agreement.

We genuinely care about the health and safety of our Board Members and staff and this is reflected in this health and safety policy.

The policy is based on a sample policy statement and other guidance available on the HSE website at www.hse.gov.uk/risk. This has helped us to think about the things that should be documented and built into our own health and safety policy, and includes elements such as remote working, personal protective and adaptive equipment, staff consultation and training etc. Susie Uppal has been designated as the most competent (experienced and capable) person to take responsibility for health and safety issues. She is supported her role by ~~Holly Perry, Head of Governance~~Saima Ansari, Executive Administration Manager. Their respective roles are identified on the following pages.

The health and safety policy is signed off by the Board and will be presented at a staff meeting to ensure that all colleagues are aware of it and understand it. We will review and update the document every year (or immediately if there are any major changes in the workplace environment).

This is the statement of general policy and arrangements for:		Press Recognition Panel
Susie Uppal – Executive Director <u>Chief Executive Officer</u>		has overall and final responsibility for health and safety
Holly Perry – Head of Governance		has responsibility – with Susie – for ensuring this policy is put into practice
Statement of general policy	Responsibility of: Name/Title	Action/Arrangements
Prevent accidents and cases of work-related ill health by managing the health and safety risks in the workplace	Susie Uppal Executive Director <u>Chief Executive Officer</u>	Relevant risk assessments completed and actions arising out of those assessments implemented. (Risk assessments reviewed when working habits or conditions change.)
Provide clear instructions and information, and adequate training, to ensure employees are competent to do their work	Susie Uppal Executive Director <u>Chief Executive Officer</u>	Staff and subcontractors given necessary health and safety induction and provided with appropriate training and any protective or adaptive equipment. We will ensure that suitable arrangements are in place to cover employees engaged in work remote from the main office.
Engage and consult with employees on day-to-day health and safety conditions	Susie Uppal Executive Director <u>Chief Executive Officer</u> Holly Perry Head of Governance All staff	Staff routinely consulted on health and safety issues as they arise but also formally consulted at regular health and safety performance review meetings or sooner if required.

<p>Implement emergency procedures – evacuation in case of fire or other significant incident.</p>	<p>Spaces</p> <p>Susie Uppal Executive Director <u>Chief Executive Officer</u></p> <p>Holly Perry Head of Governance</p>	<p>Spaces are responsible for</p> <ol style="list-style-type: none"> 1. Ensuring escape routes well signed and kept clear at all times. 2. Evacuation plans are tested from time to time and updated as necessary. <p>Susie and Holly <u>is</u> are responsible for ensuring staff are aware of the evacuation procedures in place and accounting for staff present in our office on the day of an incident.</p>	
<p>Maintain safe and healthy working conditions, provide and maintain equipment and machinery, and ensure safe storage.</p>	<p>Holly Perry Head of Governance</p>	<p>Spaces provide:</p> <p>Toilets, washing facilities and drinking water Canteen services Kitchen facilities including hot water, microwave and fridge</p> <p>Spaces have systems in place for routine inspections and testing of equipment and machinery and for ensuring that action is promptly taken to address any defects.</p>	
<p>Signed: * (Employer)</p>		<p>Date:</p>	

Health and safety law poster is displayed at (location)	Check with Peninsula
First-aid box is located:	Check with Spaces
Accident book is located:	Check with Spaces

Accidents and ill health at work will be reported under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) <http://www.hse.gov.uk/riddor>

Terms and Conditions of Service for Board Members

Basis for appointment

This document sets out the terms and conditions under which your appointment has been made as a Member of the Board of the Recognition Panel established under the Royal Charter on Self-Regulation of the Press. Under the terms of the Charter you are appointed for an initial term of five years and you are eligible for reappointment for a further period of up to three years. The responsibilities and duties of your office and of the Recognition Panel are set out in the Charter.

Excluded and restricted activities

The Royal Charter places certain restrictions on political activity of Board Members and staff:

In relation to Board Members, Schedule 1, 3.3 of the Royal Charter states:

'In order to ensure the independence of the Board, a person shall be ineligible to be appointed, or to remain as a Member of a Board if he...is a member of the House of Commons, the Scottish Parliament, the Northern Ireland Assembly, the National Assembly for Wales, the European Parliament or the House of Lords (but only if, in the case of the House of Lords, the member holds or has held within the previous 5 years an official affiliation with a political party'.)

It would be inappropriate given the Panel's status as wholly independent of government for any Board Member to engage in active politics. The list of barred activities includes:

Seeking selection as a candidate for, or being a candidate for, one of the bodies mentioned in the paragraph above, as per the Royal Charter; Membership – or seeking selection as a candidate or prospective candidate – of local authorities (with the exception of parish councils); seeking adoption or selection as a candidate or prospective candidate for election as a Police and Crime Commissioner; and holding any office, performing any role or undertaking any activity within or in relation to a political party which allows or requires the person to speak on behalf of that party or a candidate standing on its behalf in an election or which involves them doing so.

You must:

to the best of your ability act in a way which maintains political impartiality and is in line with the maintaining the absolute independence of the Press Recognition Panel, no matter what your own political beliefs are;
act in a way which deserves and retains the confidence of everyone with an interest in the Panel's work;
comply with any restrictions that have been laid down on your political activities.

You must not:

act in a way that is determined by party political considerations, or use Panel resources for party political purposes;
allow your personal political views to determine any advice you give or your actions.

Advice is available from the Chair or Chief Executive Officer.

Confidentiality

It is expected that Board Members shall not during, or at any time after the termination of their appointment with the Panel use for his or her own purpose or for another's benefit or disclose to any third party confidential material and shall use his or her best endeavours to prevent such publication or disclosure. In this context, 'confidential' information means any information or matter which is not in the public domain and which relates to the affairs of the Panel or any of its business contacts.

Remuneration and time commitment

Board Members' remuneration is regularly in line with best practice. Board members are expected to commit to 20 days per annum, and the chair to 60 days per annum.

Allowances

You are eligible to claim expenses in accordance with the PRP's expenses policy.

Expression of views

All invitations addressed to Board Members to attend or speak at stakeholder events should be referred to the Chair. Care will be taken to ensure that there is appropriate Board representation at events and that Board Members are properly briefed in advance of attendance. In the normal course of events, the Chair on behalf of the Board will be the nominated spokesman.

In relation to requests for meetings with the Board, these should normally be referred to the Chair in the first instance.

All contact with individuals and organisations will be formal and documented. Unless a meeting takes place in the context of our Whistleblowing Policy, the fact of a meeting having taken place will be subject to public record, even if the content of meetings are held confidentially.

Informal contact by bodies or individuals will be recorded if relevant.

Conflict of Interest

The PRP maintains a Register of Board Members' disclosable interests which will be a public document, published on the PRP's website. The purpose of the Register is to ensure transparency in relation to any interests of Board Members, or of their spouses, partners and dependent children.

Board Members are required to make a declaration of interests for the purposes of the Register immediately on taking up appointment as a Board Member, and are required subsequently to declare any new matter that is required to be included on the Register as soon as possible after it arises, in accordance with the PRP's board rules of procedure. Interests which should be regarded as relevant and material are set out in Annex A. You may be excluded from any discussion or consideration of any matter in which you have disclosed or declared an interest

It is the duty of each Board Member to declare any matter that is required to be included in the register. If a Board Member is in doubt as to whether or not a particular matter should be declared, they should discuss the conflict or perceived conflict with the Chair who will provide confidential guidance.

Declaration of Registrable Interests

Board Members are asked to review all aspects of their personal and professional life (and those of individuals linked to them both personally and professionally) in order to identify which interests, if any, may be perceived by the public as directly or indirectly influencing or affecting their judgement or as benefiting them. For example: any position of authority in a charity or voluntary body; connection with anybody which contracts with or is likely to contract with the Panel; directorships in public and private companies including non-executive directorships; majority or controlling shareholdings in any undertaking; ownership of any company, business or consultancy; and remunerated employment, consultancy, trade, profession or vocation.

The primary consideration which will determine whether or not an interest should be declared is the reasonable perception of the public rather than whether the interest will have an actual influence or benefit. The latter is relevant only to the issue of resolving potential conflicts and not the decision to declare.

Indemnity

A Chair or Board Member who has acted honestly and in good faith will not have to meet out of his or her own personal resources any personal civil liability which is incurred in the execution or purported execution of his or her board function, save where the person has acted illegally or recklessly. Any costs arising in this way will be met by the PRP. To minimise the risk, Members are expected to act in accordance with the Board's policies and procedures and with the support of the Board at all times.



PRESS RECOGNITION PANEL BOARD

BOARD MEMBERS' REMUNERATION AND TIME COMMITMENT REVIEW

Meeting: 28 March 2016

Status: for approval

Lead responsibility: David Wolfe, Chair

Contact details: Saima Ansari,
Executive Administration Manager

Purpose

1. The purpose of this paper is to seek the Board's confirmation that they wish to maintain the current remuneration for the Chair and Board Members and discuss and agree the expected time commitment post April 2017.

Executive Summary

2. The Terms of Membership of the Press Recognition Panel, including remuneration, are delegated to the Board under the terms of the Royal Charter (para 5.3):

'The Board may make arrangements to pay or make provision for paying, in respect of any Member, such amounts by way of allowances or gratuities as the Board determines. The amount of any such allowances or gratuities shall be set having regard to the prevailing rates payable to the members of boards of public sector bodies'.

3. The Board agreed the annualised rate of remuneration payable to the Chair and Members at its meeting on 18 November 2015 having regard to the prevailing comparable rates payable to members of boards of public sector bodies, and agreed that the rates would be reviewed annually.
4. The Chair of the Board is the sponsor of this area of work, although the Royal Charter is clear that it is the responsibility of the Board to determine its remuneration arrangements.

Background

5. The Board will recall that consultants GatenbySanderson were engaged to undertake a comprehensive analysis of the rates of pay across the public sector in November 2014, and the results were presented to the Board at its first meeting on 5 December 2014. The Board agreed that rather than a daily rate, an annual fixed sum was preferred, with an indication of the number of days to be worked per annum, to be paid in twelve equal instalments each month. The Board agreed the rate of £30,000 per annum for the Chair, for a minimum time commitment of 60 days per annum, and the rate payable to Board Members of £6,000 per annum for a minimum time commitment of 20 days per annum¹.
6. The Board reviewed the remuneration rates again at its meeting on 18 November 2015 and noted that on the basis that market rates across the public sector for non-executive chairs and board members were likely to only have moved marginally, if at all, the data commissioned in 2014 to inform the initial remuneration rates had not been updated. Consequently, the remuneration remained unchanged for the Board and Chair.

Remuneration Review 2017

7. A review was conducted on vacancies advertised on the websites for the Centre for Public Appointments, GatenbySanderson, Saxton Bamflyd and Odgers over the last few months. A sample of the recent vacancies and remunerations rates with anticipated time commitments, is attached at Annex A for information. In addition, we have also reviewed the Cabinet Office's publication, Public Bodies 2016, that provides details of remuneration paid to Chairs and Board Members
8. The research demonstrates that generally, the daily remuneration rates for Board members commonly falls between £200 and £450 and for the Chair, between £375 and £600. On the basis of this information, the current Board and Chair remuneration remains comparable to prevailing rates payable to the members of boards of public sector bodies. Standard practice remains that members should receive a set extra amount for additional commitments, usually as Chair on an audit and risk committee. The additional annual remuneration £1,500 paid to Harry Rich as ARC Chair therefore also remains appropriate.

¹ At its meeting on 30 June 2015, the Board agreed to constitute an Audit and Risk Committee, to be chaired by Harry Rich, who would be paid additional remuneration of £1,500 annually to reflect the duties he would incur as ARC Chair. The role of Senior Independent Board Member, undertaken by Tim Suter, does not attract additional remuneration.

Time Commitment

9. The Board agreed at its meeting on 18 November 2015 that in general terms, the present time commitment continued to be appropriate and that a further review would take place in autumn 2016, on the basis that decisions about the PRP's work plan and future resourcing requirements would have been made by that stage. This in turn would determine the workload and frequency of Board meetings to the end of 2017.
10. At the 28 June 2016 Board meeting, the Board considered the high-level assumptions on the PRP's design for future years and agreed an assumption that from April 2017, Board meetings would take place every other month (6 meetings a year) and that there would be no ad hoc meetings. The Board's time commitment review was deferred from Autumn 2016 to Spring 2017 on the basis of continued uncertainty of the PRP's work plan.
11. The Board has subsequently agreed proposals for the reduction in the organisation (moving to a fixed and variable Executive design with effect from 1 April 2017) based on assumptions that work activity will reduce from Autumn 2017 onwards. The proactive restructuring of the Executive will maximise the existing finances whilst still meeting anticipated peaks and troughs in workload. From 1st April 2017 to 31st December 2017, 5 Board meetings are planned (bringing down the total of annual number of Board meetings down from 12 to 8 and in 2018, 6 Board meetings will be scheduled).
12. The Board may wish to review and confirm the future time commitment in line with the projected work schedule as outlined in the final Business Plan and Budget for 2017/18.

Implications

13. The implications of decisions taken by the Board as set out in this paper are as follows:
 - Budget – the current budget presupposes the existing remuneration and time commitment.
 - Legislation – the Royal Charter gives the Board the power to set its own remuneration.
 - Resources – exact resource requirements are dependent on the rates that are approved.
 - Equality, Diversity and Inclusion – no specific issues arise.

Devolved Nations

14. There are no identifiable implications/differences in relation to this area of activity and the devolved nations.

Communications

15. The arrangements for reviewing Board remuneration are published on the PRP's website and currently states that the Board reviewed the remuneration set at its meeting in November 2015 and agreed that the rates should not change from those agreed in December 2014.
16. The wording on the PRP website will be updated to reflect the Board's decision.

Risks

17. There is a risk of challenge with the Board in setting its own remuneration; however, the Royal Charter specifically makes this compulsory. The independent report prepared by external consultants in 2014 provided assurance that the Board member rates remain comparable with other public sector bodies. The light touch review undertaken by the Executive confirms that there has not been a significant change in the rates since this exercise was completed.
18. The PRP operates in an open and transparent manner and continues to proactively review costs and ensure compliance with Managing Public Money. The time commitment review in light of the draft business plan provides assurance that the remuneration and respective minimum time commitment has been objectively set.

Recommendations

19. The Board is invited to:
 - Discuss and agree the minimum time commitment from April 2017 to March 2018; and
 - Discuss and agree the daily remuneration rates and confirm whether this amount should continue to be paid as an annualised amount, to be paid in 12 equal instalments based on the agreed minimum time commitment.

Recent recruitment drives for public appointments for Board Members/Non-Executive Board Members – February/March 17

Chair of Intellectual Property Office Steering Board:	£450 per day, capped at £10,000 per annum. Reasonable travel and subsistence expenses will be reimbursed.	22 days per year. Any additional days worked will be on a voluntary basis.
Insolvency Service Board Members	INSS Board Members will receive an annual remuneration package of £11,000 per annum for this commitment. All Non-Executive Board Members appointments will also be entitled to claim travel and other expenses reasonably incurred in relation to INSS business.	INSS Board Members will be expected to work 20 days per year (part-time)
Agency Non-Executive Board Member - Criminal Injuries Compensation Authority	£400 per day	Up to 9 days per year
School Teachers' Review Body members	£300 per day spent in meetings and on visits. No additional fee is paid for any time spent in preparation or travelling. Members can claim reimbursement for reasonable travel and subsistence costs incurred on STRB business rates set centrally.	Time commitment will vary depending on work programme, but is likely to be around 25 full days per year, plus preparation time for reading meeting papers.
UK Anti-Doping Board Members	Remuneration is currently set at £215 per day.	It is envisaged that the time requirement will typically be 1 to 3 days per month.
Regulation Committee Members - Homes and Communities Agency	£11,000 per annum based on 2 days per month However, actual remuneration will depend on any additional HCA committee membership, pro rata for the number of days.	2 days per month
UK Research and Innovation Board Members	UKRI Board Members will receive an annual remuneration package of £9,180 per annum for this commitment. Any additional days worked will be compensated at £459 per day.	UKRI Board Members will be expected to work 20 days per year. It is expected that both the Innovation Champion and the Chair of the Audit Risk and Assurance Committee will be required to commit between 20-35 days per annum to UKRI work.
Single Source Regulations Office - Member	Up to £500 a day	2-4 days per month