

**From:** [Peter Wright](#)  
**To:** [Paul Nezandonyi](#)  
**Cc:** [Susie Uppal](#)  
**Subject:** RE: Letter from David Wolfe  
**Date:** 18 August 2016 17:41:57

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Dear Paul

I would be very grateful if you would forward the email below to David Wolfe.

Many thanks

Peter

Dear David

Thank you very much for your reply to my letter of August 11. It is disappointing that you have not provided direct replies to any of the 20 questions I asked.

You say in your letter *'The Charter specifically leaves it to our Board to decided how to conduct its functions.'*

What the Charter actually says in its Preamble is this:

*'3.1 The Purpose for which the Recognition Panel is established and incorporated is to carry on activities relating to the recognition of Regulators in accordance with the terms of this Charter.*

*3.2. Provisions and definitions to assist in the interpretation of this Charter are contained in Schedule 4 (Interpretation).'*

Any ordinary person would read this as meaning the Press Recognition Panel is strictly bound by the Charter, the Recognition Criteria contained in it, and the interpretation which the Charter itself provides in Schedule 4.

When the Royal Charter was being debated one of the major concerns of the newspaper industry was that once politicians had set the terms under which a regulator could be recognised, they could change them. We were assured that the double lock in Article 9 of the Charter, under which any changes have to be approved by a two-thirds majority of both Houses of Parliament and/or the Scottish Parliament, would prevent this happening.

The PRP now appears to believe it has the power to vary the Recognition Criteria at will by 'interpretation'.

You also say in your letter: *'There is no requirement on us to provide any public process or information at all.'*

This is not what case law rules, nor is it best practice for public bodies to conduct their business without consultation on key points of legal interpretation.

Furthermore the Charter says:

*'4.3 The functions of the Recognition Panel shall be public functions.'*

The PRP recognises this when it says on its website that it will perform its duties 'independently, fairly, openly and transparently'.

In the case of the IMPRESS application the PRP conducted two well-publicised consultations, to which we responded in the belief the PRP would be applying the Recognition Criteria as set out in the Royal Charter. We have since discovered that key Criteria have subsequently been reinterpreted, and

that reinterpretation has been communicated to IMPRESS before it was published (but significantly not notified) to other stakeholders.

This is not a proper way for a public body to carry out its functions, nor is it fair, open or transparent.

We note that since receiving our letter the PRP has altered its Guidance for Applicants, again without notice, by removing its interpretation in section 5 from the Guidance and re-labeling it 'an initial indicative view on the interpretation and meaning of some terms and elements of the Charter'.

We would be grateful for an explanation of the purpose and meaning of this. Does it mean that when the Board meets on August 23 it may choose to place yet another different interpretation on the Recognition Criteria?

We also note that IMPRESS have today published a draft Standards Code and announced a consultation on its contents which will close on September 29. It seems extraordinary for the PRP to make its decision on recognition when it has had only two working days to consider such a central part of the IMPRESS proposition - unless, as with other aspects of this application, there has been private collaboration.

We would be grateful if you could make this correspondence available to the Board so they can take it into account when they make their decision.

With best regards

Peter Wright  
Editor Emeritus  
Associated Newspapers

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**From:** Paul Nezandonyi [pnezandonyi@pressrecognitionpanel.org.uk]  
**Sent:** 15 August 2016 16:13  
**To:** Peter Wright  
**Cc:** Susie Uppal  
**Subject:** Letter from David Wolfe

Dear Peter

Please find attached letter from David Wolfe, Chair of the Press Recognition Panel.

Best wishes

Paul

**Paul Nezandonyi**  
**Head of Communications and Stakeholder Engagement**  
**Press Recognition Panel**

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