

Dear Press Recognition Panel,

I am newspaper reading member of the public, and I have followed the entire media coverage of press hacking and the Leveson Report with great interest and some concern. I have considered the consultation and read Hacked Off's submission to the PRP consultation, a copy of which is [here](#). I am writing firstly to say that I back Hacked Off's submission, prepared with the input of victims of press abuse. I hope you will take note of this.

The issues which I think are particularly important in regards to the whole handling of complaints are complaints handling, press regulation and record keeping and in response to the Consultation I would like to draw your attention to my views (which I share with Hacked Off) on how the PRP should apply the Charter criteria in respect of this particular matter below.

Internal governance, complaints, sanctions and reports of compliance

In regard to the above previous regulatory schemes and their complaints processes have been criticised (and found by independent inquiries) to be not "fair" – they were biased towards the newspaper.

Full reports of compliance

While the Regulator will be able to audit complaints that are escalated to it, it will rely on the subscribers' record-keeping and reporting or inspection for those complaints which do not reach the regulator in order to determine whether **"those who subscribe to have an adequate and speedy complaint handling mechanism"**.

A significant problem with the PCC was that code breaches which were resolved before they reached the PCC were never recorded or reported. This could potentially allow for repeated code breaches, forming what could have been the basis for an investigation of systemic breaching, but which are never known by the regulator or recorded anywhere.

While it is important to enable and encourage newspapers to resolve complaints before they need to be dealt with by the regulator, it is not acceptable for such newspapers to be breaching regularly without record (efficient though they may be at resolving the resultant complaints). For example they may have the practice of buying off complainants with donations to charity.

So the PRP should make clear in the guidance column (also called "indicators") that the Regulator will need to show

Written agreements between the Regulator and subscribers regarding the recording of complaints and associated code breaches from complaints which are not “escalated”.

Criteria 9 and 20 also point to the same requirement.

I strongly believe that the Regulator should be independent from the Press and that there should be proper enforcement of any remedies in the case of a breach of the Press Code. I also believe that apologies and corrections should be given more prominence to reflect the impact false stories and breaches of personal security and privacy can have on individuals, lives.

I hope that you will take note of my email,