

Dear Press Recognition Panel,

I am a member of the public and a supporter of the Royal Charter. I am anxious that, after all this time and effort, the Leveson Report is properly seen through and real changes are made.

I have read the submission from Hacked Off, and I fully support it. It is particularly powerful in that it has been prepared with victims of press abuse, who know better than anyone the impact of an ineffectively regulated press.

Some specific points:

Investigations and sanctions

Criterion 18 is:

The Board, being an independent self-regulatory body, should have authority to examine issues on its own initiative and have sufficient powers to carry out investigations both into suspected serious or systemic breaches of the code and failures to comply with directions of the Board.

The investigations process must be simple and credible and those who subscribe must be required to cooperate with any such investigation.

I am concerned that wording must be tightly drawn to ensure that those under investigation have no choice but to provide any information requested by the regulator. I am familiar with organisations who hide key information and then, when requested, provide selective versions/slices of information which do not reveal the whole picture. Much time and money is wasted as a result. The following guidance must apply in my view:

For the powers to be sufficient and the process credible, the co-operation required must include the prompt disclosure of otherwise confidential relevant information subject to a non-disclosure/non-publication undertaking by the regulator.

In addition strict timescales must be applied - again to prevent time-wasting and additional costs.

Criterion 19 is:

The Board should have the power to impose appropriate and proportionate sanctions (including but not limited to financial sanctions up to 1% of turnover attributable to the publication concerned with a maximum of £1,000,000) on any subscriber found to be responsible for serious or systemic breaches of the standards code or governance requirements of the body.

The Board should have sufficient powers to require appropriate information from subscribers in order to ascertain the turnover that is attributable to a publication irrespective of any particular accounting arrangements of the publication or subscriber. The sanctions that should be available should include power to require publication of corrections, if the breaches relate to accuracy, or apologies if the breaches relate to other provisions of the code.

I am concerned that the publication of 'corrections' or apologies is sometimes so brief and so obscured by other material in the publication, as to go un-noticed by the average reader. In effect this means that the original story stands as far as that reader is concerned. In my view Criterion 19 should include 'the power to require the publication of an investigation' so that the balance is redressed.

