

- Surname: **Tambini**
- Forename(s): **Damian**
- Name of the organisation (if applicable): **personal capacity**
- Your email address: [d.tambini@lse.ac.uk](mailto:d.tambini@lse.ac.uk)
- As an individual (please indicate): **Academic, Member of the public**
- For an organisation (please indicate):
- Question 1: Do you agree with the principle of using indicators and examples of evidence as guidance to applicants and the PRP in determining applications?: **Yes**
- Give reasons if you wish.:
- Question 2: Do you agree with the indicators and evidence we propose?: **Yes**
- Give reasons if you wish. For specific comments on the criteria, use the comments box on the matrix.: **I agree in general but I think there is more you can do to provide clear, over-arching guidance on independence of the self-regulator. I suggest you need to preface your guidance with a general statement of independence from government and industry, and a clarification of the constitutional position of the self regulator. Public debate about the Charter and the PRP has focused on concern about the potential for government control of the self regulator, and PRP guidance is an opportunity to clarify and safeguard this. The Charter requires independence both from government and from industry, in order to underline the constitutional independence of the self-regulatory scheme. Many of the criteria are concerned with evidence of independence. There is somewhat more detail on the issue of independence from industry, and more stress needs to be given on independence from government and parliament. A principles-based approach could clarify clearly the interpretation of this notion of independence itself, and in particular the following key issues. 1. Independence from industry needs to be achieved whilst retaining expertise. This can be done by clearly distinguishing between media companies and publishers and the profession of journalism. Links to the profession of journalism are not necessarily a problem. Capture by publishers and media companies is more likely to be an issue. 2. Independence from Government is the second constitutional principle that needs to be clarified in terms of PRP guidance. Independence from Government needs to be safeguarded whilst retaining accountability and legitimacy through civil society links. Guidance can make clear that whilst the Self Regulator does need strong links to civil society organisations, a close association with any branch of government would be damaging. So whilst the Charter makes clear that Parliamentarians are disqualified from membership of the board, the guidance can make clear by adopting a principle of independence that close association with former parliamentarians, close advisors, and officials should be avoided, and that the PRP will make a balanced decision on independence taking such associations into account. The PRP needs discretion here to make a balanced decision.**
- Question 3: Do you agree with our proposed approach to dealing with applications?: **Yes**
- Give reasons if you wish.:
- Question 4: Do you agree with our proposed approach to discussions with applicants?: **Yes**
- Give reasons if you wish.:

- Question 5: Do you agree with our approach to granting recognition?: **No**
- Give reasons if you wish.: **See above. I think the criteria matrix approach should be supplemented by a statement of principles on independence.**
- Question 6: Do you consider that our proposals will have any impacts, either positive or negative, including on our compliance with the Public Sector Equality Duty?: **Yes**
- Give reasons if you wish.: **Likely positive impacts.**