

- Surname: **Clark**
- Forename(s): **Chris**
- Name of the organisation (if applicable): **Make Public**
- Your email address:
- :
- :
- As an individual (please indicate):
- :
- For an organisation (please indicate): **Third sector or campaigning organisation**
- :
- 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.: **Yes. Applicants will need a lot of guidance to understand what a shared understanding of what a particular charter criteria might generally look like. It will build substantial trust in the whole system, and also go a very long way to reducing incidences of intended mis-interpretation by interests aligned elsewhere.**
- Question 2: Do you agree with the indicators and evidence we propose?: **No**
- Give reasons if you wish. For specific comments on the criteria, use the comments box on the matrix.: **Section 8 - Freedom of Speech and Interests of the Public Nowhere in this criteria is there a section covering advertiser bias and advertiser control of editorial decisions that work to the detriment of freedom of speech, interests of the public, and exposing crime. I cite the well known case of Peter Obone and the Daily Telegraph, HSBC and tax scandal, where HSBC Switzerland was at fault, and HSBC is a big Telegraph advertiser. I now cite my current case, which is the virtual non-coverage only in the UK of the atrocities that have taken place at the Iranian Opposition refugee camp at Camp Liberty, Baghdad, Iraq (yes, the Iranian Opposition camp is in Iraq) and the very strong links between the Iranian mullahs and BP, in particular exemplified by BP's co-investment with the regime in the high risk \$45Bn oil and gas projects in the Caspian Sea. I further refer to BP's very high \$50m - \$100m annual advertising expenditure (source: National Bureau of Research and covered in Harvard Business Review), much of it in full page adverts in our newspapers. I also cite that excluding Deepwater Horizon, little coverage is given to BP Caspian Sea, and much to BP's activities in the UK, though the Caspian Sea is covered plentifully in the oil and gas trade press. It is our belief BP are pressurising the media and the FCO to keep the Iranian opposition out of the news. We can point to much higher and much more frequent coverage in France and the USA. I cite two rare examples of where coverage succeeded, both times in the Guardian:**  
<http://www.theguardian.com/world/2013/feb/09/iranians-protest-over-refugee-killings-iraq>  
<http://www.theguardian.com/world/2012/feb/23/threat-iranians-camp-ashraf> The well-cited academic paper "WHAT DO THE PAPERS SELL? A MODEL OF ADVERTISING AND MEDIA BIAS\*" covers this in detail, see  
<http://www.iae.csic.es/investigadoresMaterial/a8287092114archivoPdf1062.pdf> There are a good number of other similar studies from the last 15 years. So I would call upon both IMPRESS and your regulator applicants to consider the effect of separation of editorial policy and advertiser pressure, and to write in this protection under freedom of speech, interests of the public, and exposing crime. We can provide copious examples of omission, and Lord Carlile will also comment in similar terms if you ask him. Section 10 - The ease of use of the Complaint Handling Mechanism IT System is essential to the credibility of applicants but is not mentioned at all in the criteria. For example, we do not want a system like Action Fraud where the site precluded the submission of fraud evidence! The system chosen by the applicant needs to be effective at capturing web information and links at time of publication, not just a link itself where an article then gets rewritten after

the damage is done and the sales made, (Times, Mail etc). It also needs to be effective at keeping complainant and applicant in touch on case handling, and needs to draw heavily on the better customer service IT systems used in business. Section 21 - I would like to see quarterly reporting, emailed out to interested parties as well as announced on the website.

- Question 3: Do you agree with our proposed approach to dealing with applications?: **No**
- Give reasons if you wish.: **15 working days might be rather short. Calendar month perhaps?**
- 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?: **Yes**
- Give reasons if you wish.:
- 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?: **No**
- Give reasons if you wish.: **No because nothing is written about this area in the document. I believe an expectation should be set regarding how applicants should consider equality, itself a wide-ranging question given the newspapers the applicants would oversee have notorious BME and gender imbalances. Also outside the immediate scope of this question, but nonetheless important, may be the effect of unfair naming on people from different cultures, tribes, or groups. This might more be a Criteria Section 8 issue.**