

FINAL

PRESS RECOGNITION PANEL

**Minutes of the 12th meeting of the Press Recognition Panel Board
held on 20 October 2015 at Mappin House, 4 Winsley Street, London W1W 8HF**

Present: Dr David Wolfe QC (Chair), Harry Cayton, Emma Gilpin-Jacobs, Carolyn Regan and Tim Suter

In attendance: Susie Uppal (Executive Director), Holly Perry (Head of Governance), Paul Nezandonyi (Communications and Stakeholder Manager), Jonathan Gorvin (Regulatory Manager) (from paragraph 19), Atiqur Chowdhury (Research and Business Manager) (from paragraph 19) and Megan Archer (JS2 Ltd)

Apologies: Harry Rich

BOARD MEETING – PUBLIC SESSION

Welcome

1. The Chair **welcomed** Members and attendees to the twelfth meeting of the Press Recognition Panel Board, the first meeting to take place in the PRP's new offices at Mappin House.
2. The Chair also **welcomed** the members of the public who were in attendance, who confirmed that they were happy to be named as having been present:
 - James Connal, Capital PR; and
 - Dr Evan Harris, Hacked Off Campaign (from paragraph 17).

Declaration of members' interests

3. There were no new declarations to note.

Minutes of the meeting held on 22 September 2015, outstanding actions and matters arising

4. The minutes of the meeting held on 22 September 2015 were **approved**. The Chair would sign a copy of the minutes as a correct record.
5. The log of outstanding Board actions was **noted** and **agreed**. In relation to action 22, the wording 'Christmas celebration' would be amended to 'seasonal end of year event'.
6. The Board **noted** that there were no matters arising that were not covered elsewhere on the agenda.

Executive Director's Report – October 2015 – Paper PRP56(15)

7. The Board received a paper which provided an update to the Board on executive activity since the last Board meeting on 22 September 2015. As this was the first such report, the Board were invited to comment on the report's format and content.
8. The following points were raised in discussion:
 - the Board agreed that the structure of the report and its content were helpful;
 - in relation to diversity data, the Board **agreed** that the information would be published on the website, with an accompanying note that explained the fact that completion of the diversity form was optional, and that only 25% of respondents had completed the form meaning that the data did not therefore reflect the makeup of the whole responder group;
 - in relation to staff contracts, the Chair reported that Harry Rich had provided written comment, requesting clarification that the payment of 'up to 10% contributory pension' by the PRP would be matched by the employee – the Executive Director confirmed that this was the case and on this basis, the Board **agreed** the arrangement for pensions and other benefits in kind as set out in the paper.
9. The Board:
 - **noted** the contents of the Executive Director's report, confirming that they were content with the format and content; and
 - **agreed** the publication of the diversity data for consultation respondents on the PRP's website, alongside the accompanying note as raised in the discussion.

Finance Report October 2015 – Paper PRP57(15)

10. The Board received a paper which updated the Board on the financial

position as at 30 September 2015 and provided a draft rebalancing of the budget to 31 March 2016.

11. The following points were raised in discussion:

Financial position as at 30 September 2015

- the Board **noted** the continuing underspend – which as at 30 September 2015 was £464,475 against a budget of £529,214;

Draft forecast outturn for the year ended 31 March 2016

- in relation to the rebalancing of the budget, the Board **noted** increases in expected spend in the following areas: HR and recruitment, serviced offices, IT, printing and subscriptions;
- the Executive Director explained that the rebalance would be finalised once the current recruitment and salary benchmarking work had concluded, and there was clarity about the related costs – it was **noted** that the forecast would be circulated to the Board again once finalised;
- in relation to IT, the PRP had under-budgeted this area of expenditure – costs had been higher than expected to date, and would continue to be so, owing to ongoing problems related to cloud based file-sharing via Office 365. Cost effective solutions were being sought for the longer term – some costs would be set aside for trouble-shooting, while a small sum would be set utilised to look into permanent solutions such as networking;
- in relation to serviced offices, costs to the year-end had increased by £6,000. The Executive Director confirmed that there were no additional costs arising from the move to Mappin House. The additional expenditure arose as a result of under-budgeting in the early period;
- in relation to printing, there were costs associated with the anticipated publication of two further consultation documents by 31 March 2016. It was **noted** that while the PRP might host events to coincide with launch of these consultations, there was no intention to undertake a series of events i.e. roadshows as for the first consultation.

12. The Board:

- **noted** the latest financial position as at 30 September 2015; and
- **noted** the draft forecast outturn for the year to 31 March 2016.

Governance Framework update – Paper PRP58(15)

13. The Board received a paper which invited the Board to approve two draft policies to complement the PRP's governance framework: a corporate social responsibility policy and a health and safety policy.

14. The following points were raised in discussion:

Corporate social responsibility policy

- the Board **noted** the approach to combine environmental aspects into the corporate social responsibility policy, given the PRP's size and very limited environmental impact;
- references to the number of staff on page 2 would be deleted, as the policy extended to the Board as well as staff.

Health and Safety policy

- the Board **noted** that the draft was based closely on the Health and Safety Executive's guidance and toolkit,;
- the Board requested that references in the policy and risk assessment template to Spaces' responsibilities (e.g. display of health and safety notices) be cross-checked, to ensure that these could be appropriately delegated by the PRP to the landlord – following these checks, it was **noted** that the risk assessment would be completed by the Executive Director and Head of Governance.

15. The Board **approved** the following draft policies for publication on the PRP website, subject to reflection of the amendments raised in discussion:
- Corporate social responsibility policy; and
 - Health and safety policy.

Communications strategy update – Paper PRP59(15)

16. The Board received a paper which provided an updated communications strategy for the period October 2015 to December 2016, to which Emma Gilpin-Jacobs had contributed.

17. The following points were raised in discussion:
- The Board **agreed** that the approach to communications should be aligned to the PRP's values, and should be designed to inform and educate. Publicity would not be sought for its own sake;
 - a typographical error on page 3 would be corrected;
 - at paragraph 15, the wording 'informed' would be replaced with 'influenced at all';
 - at paragraph 19, the wording 'has limited understanding' would be replaced with 'is building its understanding';
 - at paragraph 20, relating to the storage of details of stakeholders, Board Members were keen to input the proposed system for tracking and recording engagement with stakeholders;

- information about stakeholders would be processed in accordance with the Data Protection Act;
- at paragraph 22, rather than ‘rebut’, the PRP ‘correct’ inaccuracies or misinformation;
- at paragraph 30, the Board noted that a communications plan would be produced for the PRP’s first anniversary; and
- in relation to digital media, reference would be made to Facebook and LinkedIn as well as Twitter.

18. The Board:

- **agreed** the PRP’s communications approach, subject to reflection of the points raised in discussion, including the key messages for the PRP and the scale of the PRP’s signposting and educational role; and
- **approved** the updated communications strategy, subject to reflection of the points raised in discussion.

Update on the approach to cyclical and ad hoc reviews – Paper PRP60(15)

19. Following the Board’s discussion of a number of key principles on the approach to ad hoc and cyclical reviews at the 22 September 2015 meeting, the Board received a paper which built on these discussions and provided an early update on the type of framework which could be set out in the proposed consultation.

20. In opening the discussion, the Board **noted** that the executive had analysed the approach adopted by other regulators and oversight bodies, and had also looked at case law. The Executive Director advised that there appeared to be strong argument for not publishing information about the fact of a review until the conclusion of any review, in light of the potential impact on the regulator.

21. The following points were raised in discussion:

Gathering information

- it was **noted** that the PRP would undertake a range of methods to gather information, including asking regulators for information that might help prevent an ad hoc review and sharing data with other organisations. The ‘traffic light’ system set out at paragraph 17 of the paper indicated how information would be graded;
- it was **agreed** that more specific triggers would be formulated for the draft consultation paper - the PRP would work up and consult on possible descriptors for the scales of likelihood and seriousness, to

ensure the proposals avoided being abstract.

Publicising ad hoc reviews

- there were a range of opinions in relation to publication of the fact of an ad hoc review. On the one hand, if the PRP had undertaken a filtering process, there appeared to be no strong evidence to justify not placing the information in the public domain, particularly as it was possible that the public might have information that would be relevant to any review, and the threshold for conducting an ad hoc review would be high. There was also a presumption that the decision by the Board to undertake an ad hoc review would be taken in public session. On the other hand, publishing even the fact of a review might cause reputational damage to organisations, individuals, and affect public confidence;
- it was **noted** that vexatious approaches were a risk, however the filtering process would help to ensure that vexatious approaches by individuals or organisations were kept in check;
- given the agreement to adopt the two-stage process (stage one being the decision as to whether or not an investigation was warranted, and stage two being the actual ad hoc review), it was **agreed** in principle that – subject to ensuring the PRP was in a legally robust position - reference should be made on the website to the fact of an ad hoc review (if stage one determined that an investigation was warranted), with the caveat that the PRP would then make no further comment on the matter until the process had concluded;
- it was **agreed** that care would need to be taken with the language used in stage one – there should be no expectation that every piece of information provided to the PRP would automatically trigger an ad hoc review;
- it was **agreed** that a separate and specific process would be developed to accommodate whistleblowers, given their particular protections in law (as distinct from the policy that had already been developed for staff);

Cyclical review - call for information

- The Board requested clarification of what was meant by the wording, 'the PRP will provide a continual feedback service once a regulator is approved'. It was agreed that the PRP's role would not be this active, and the language would be loosened. The link to the whistleblowing policy would also be referenced here.

22. The Board **agreed** the approach outlined in the paper in relation to cyclical and ad hoc reviews, and **noted** that the draft consultation document would

be presented to the Board for approval at the 13 January 2016 meeting.

Closing discussion

23. The Chair invited the members of the public who were in attendance to make any observations and to raise any questions.

Dr Evan Harris, Hacked Off campaign – Dr Harris asked whether the PRP had any statement to make in response to the Culture Secretary's speech to the Society of Editors on 19 October 2015 regarding commencement of the sections of the Crime and Courts Act relating to costs shifting. The Chair responded that the Board had not yet had the opportunity to discuss the matter, but would do so in the confidential session later on 20 October 2015. POST MEETING NOTE: The Board agreed a [statement](#)¹ that was subsequently published on the PRP website.

24. No further comments were received.

Any other business

25. There were no other items of business.

Date and time of next meeting

26. The Board **noted** that the next scheduled meeting of the Board would be held on Wednesday 18 November 2015 at 11:00.

¹ <http://pressrecognitionpanel.org.uk/post/our-response-to-the-culture-secretarys-speech-at-the-society-of-editors-conference/>