From: Evan Harris
To: Applications
Subject: IMPRESS Application for Recognition
Date: 04 March 2016 22:42:05

Criteria 7 - Standards Code

It has been suggested by the Chair of IMPRESS in his LSE lecture that the Regulatory Funding Company will seek to impose restrictions on the use by IMPRESS of the Editors' Code as the initial standards code.

It should be recognised that the preamble to the Royal Charter [https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/254116/Final_Royal_Charter_25_October_2013_clean__Final_.pdf] states "AND WHEREAS the independent regulatory body which is intended to be the successor to the Press Complaints Commission should put forward the Editors' Code of Practice as its initial code of standards". The reason for this was to give recognition in the Charter to the Editors Code as the being the starting code for any recognisable and recognised regulator.

Irrespective of the force and weight to be accorded to the preamble, it would be utterly pointless and meaningless to include that provision in the Preamble if the only recognisable regulator was not able to cite the Editors Code as its initial code.

By the same token, if IMPRESS indicate to PRP that they are able to use another Code should the need arise (for example, if IMPRESS is later forced by legal action from the RFC to not use the editors code - which seems most unlikely) then this criteria should be satisfied.

Dr Evan Harris
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