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18 August 2016

Dear Susie,

### **PRP Board Decision**

We look forward to seeing you at next week's Press Recognition Panel Board meeting. We understand that your Board may wish to ask us questions in relation to our application. Walter Merricks, Ed Procter and I will be attending the meeting and will be happy to address any such questions.

We are particularly keen to address any outstanding concerns your Board may have in relation to recognition criteria 6, 9, 10 and 23. To this purpose, we would like to provide the following information in advance of the meeting.

### **Criteria 6 and 23**

As you know, the overriding aim of the Charter is that a self-regulatory body for the press should be independent and effective. Criterion 6 aims to ensure that the regulator's financial arrangements secure its independence from regulated publishers whilst Criterion 23 aims to ensure that these financial arrangements are fair, reasonable and non-discriminatory towards regulated publishers.

Clearly, Criterion 23 cannot be interpreted in such a way as to take precedence over the Charter's overriding concern with independent and effective regulation. This is why we have decided to ensure that publishers cannot withdraw from the regulator after the annual budget has been set. This measure is designed to ensure the stability of funding and accurate budgeting which is required by Criterion 6 and which is central to the purpose of the Charter as a whole. Any other approach would risk compromising the regulator's independence from regulated publishers and its effectiveness.

We believe that these terms satisfy the natural meaning of 'fair', as used in Criterion 23. The adjective 'fair', where it relates to conduct, actions, methods, arguments, etc., is defined in the Oxford English Dictionary as meaning 'free from bias, fraud, or injustice; equitable; legitimate, valid, sound' (14.a(a)). We see no reason to believe that the terms of our

agreements with publishers are in any way biased, fraudulent, unjust, inequitable, illegitimate, invalid or unsound.

### Criteria 9 and 10

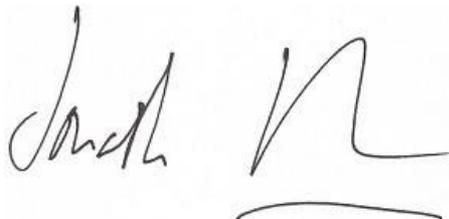
As of 12pm on Thursday 18 August, IMPRESS had received application forms in relation to 42 publications. Of these, the following 14 have completed our compliance checks and are now listed on our website as 'regulated':

- **Caerphilly Observer (regulated)**
- **Caerphilly Observer print edition (regulated)**
- **Formby Reporter (regulated)**
- **Gedling Eye (regulated)**
- **Lincolnshire Business Magazine (regulated)**
- **Lincolnshire Reporter (regulated)**
- **Liverpool Reporter (regulated)**
- **Mersey Reporter (regulated)**
- **Shropshire Live (regulated)**
- **Southport Reporter (regulated)**
- **The Ferret (regulated)**
- **The Lincolnite (regulated)**
- **VIEWdigital (regulated)**
- **Waltham Forest Echo (regulated)**

If you visit these publications' websites, you will find that in all cases they display the relevant information about their in house complaints-handling procedures and their membership of IMPRESS.

We can also confirm that we have now strengthened our procedures in order to ensure that publishers demonstrably and transparently comply with our policies in relation to criteria 9 and 10.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Jonathan Heawood", written over a horizontal line.

Jonathan Heawood  
Chief Executive Officer