



Press Recognition Panel  
Mappin House  
4 Winsley Street  
London W1W 8HF

Tamsin Allan  
Bindmans LLP

Sent by email only  
t.allen@bindmans.com

24 October 2016

Dear Tasmin

**IMPRESS application for recognition**

Thank you for your letter dated 21 October 2016. I note that you act for IMPRESS in this matter.

You are correct to say that my Board is considering your client's application on 25 October 2016. The Royal Charter, which sets out the Board's role, explicitly requires the Board to grant recognition to an applicant regulator if the Board is satisfied that the regulator meets the Charter criteria numbered 1 to 23, and in making that decision the Charter requires the Board to consider the concepts articulated in the Charter and in the Leveson Report, Part K, Chapter 7, Section 4.

To assist the Board with their decision making, the PRP executive team has, in line with our published guidance to applicants, carried out an assessment of your client's application. The decision of whether to grant recognition however lies fully with my Board. It follows therefore that if the Board needs to ask questions of your client in order to satisfy themselves that the criteria have been met, your client needs to be ready to answer them. Our guidance envisages this; we set out quite clearly: 'a representative of the applying regulator may be asked to attend the meeting in person or be available by phone or video conference in case the PRP Board has any questions that the PRP executive team cannot answer or would like to discuss any aspect of the application with the applicant'.

The PRP Board cannot refuse to grant recognition if all the criteria are met.

Whilst I am finding it difficult to understand the circumstances your client envisages may cause a problem, I am happy to confirm that any matters which are not relevant to the criteria will not be taken into consideration. Indeed, we have no power to do so.

Turning to the issue of your client needing more time to answer any additional questions my Board may have of them in relation to their application, this is a matter I discussed with your client on 3 October 2016 and note that I wrote to him on the same date:

'I can confirm that we will need a representative from IMPRESS to be available in case the PRP Board have questions which we are unable to assist them with. I understand of course that the representative may not be able to answer the questions straightaway and, depending on the nature of the question, may need an appropriate amount of time to seek the answer.'

Your suggestion therefore that your client's request was ignored is incorrect. At all times, we have ensured that our procedures are fair, and we will continue to do this. Your clients will be afforded sufficient opportunity to respond.

I am a little puzzled by the suggestion that the questions I sent over last week are only 'arguably relevant'. If you consider that any of the questions we have asked of IMPRESS at any time during the process are not relevant to the task we have, can you please make that clear and explain why. I would want to make sure that I advise my Board accordingly before tomorrow.

We note that your letter is marked 'private and confidential', however it is our policy to put any significant correspondence on our website. We intend to do the same with the letters passing between us. If you wish to make representations to the contrary, then please do so. I will ensure that these are considered.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Susie Uppal', is centered within a light gray rectangular box.

Susie Uppal  
Chief Executive of the Press Recognition Panel