

**From:** [Prof. Chris Frost](#)  
**To:** [Applications](#)  
**Subject:** PRP consultation over impress  
**Date:** 01 June 2016 21:24:46

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Dear Dr Wolfe,

REF: Second PRP call for information about IMPRESS's application for recognition

I am writing on behalf of the National Union of Journalists (NUJ) to support the application for recognition from Impress. The NUJ is the UK trade union for journalists with around 30,000 members spread across the industry. The Union agreed at its delegate conference in April 2016 that:

“This DM [Delegates Meeting] welcomes the January 2016 application by Impress, the alternate press regulator, for Royal Charter recognition and wishes the would-be regulator well. DM notes that it intends to be Leveson compliant matching the 29 requirements and is independent of publishers whilst involving journalists on its board and in its development.”

We are also particularly concerned about the claims and counter-claims made concerning IMPRESS's revised application for Recognition, and specifically, the dispute over the meaning of criterion 6 of the Royal Charter as it relates to the IMPRESS application.

Criterion 6 reads:

“Funding for the system should be settled in agreement between the industry and the Board, taking into account the cost of fulfilling the obligations of the regulator and the commercial pressures on the industry. There should be an indicative budget which the Board certifies is adequate for the purpose. Funding settlements should cover a four or five year period and should be negotiated well in advance.”

- Schedule 3, Section 6, Royal Charter on Self-Regulation of the Press

We note that the News Media Association (NMA), in its submission to the PRP's consultation on IMPRESS's initial application, suggested that this criterion should be interpreted in such a way that only a regulator “set up or supported by the industry” (Page 9, Point 25, NMA submission) could be recognised, and furthermore that the term “industry” in criterion 6 must mean that sector of the industry dominated by national newspaper and large regional/local newspaper companies.

The NUJ disagrees.

First, that is not what criterion 6 says. Their suggestion is simply an attempt to re-write the criteria set out by Leveson and subject to cross-party agreement in Parliament.

Second, even if the PRP had a mandate to interpret this criterion in such a narrow way and was minded to do so, then the NMA would have no proper basis to describe IMPRESS's potential members as “not remotely representative of the industry” (Page 9, Point 25, NMA submission). The NMA gives its view as an association of newspaper corporations that have rejected the Leveson system of self-regulation outright and that, to public knowledge, has never even consulted its own members – far less, its employees – before making its submissions. In the main, the NMA represents a small group of very wealthy and powerful press owners whose interests are quite distinct to those of our members.

If any group is representative of the press then it is the many journalists who produce newspapers, rather than the wealthy few proprietors who own them. Unlike the NMA, the NUJ consults its members and they vote democratically before giving a view on a matter such as this as confirmed in the above motion. Therefore, the industry does support and welcome the establishment of IMPRESS.

IMPRESS's endorsement from the organisation representing thousands of working

journalists renders the NMA's proposed interpretation of what constitutes the "industry" on criterion 6 null and void. At the very least it provides an alternative definition for what the "industry" is in criteria 6, which means that in accepting the NMA interpretation the PRP would be rejecting the views of ordinary working journalists. Our view is that it is not necessary to consider what defines the industry in the context of criterion 6 beyond the publications who are members of the regulator at any given point.

I trust that the PRP will take this into account when making a decision about IMPRESS's application.

Best regards,

Professor Chris Frost  
Chair, NUJ's Ethics Council and NEC member.

Best,



Prof Chris Frost  
Sent from my Samsung Galaxy smartphone.