

Please find my response to your consultation below.

1. In your opinion, has the new system for overseeing press regulation in the UK been a success or failure so far? Please explain your reasons.

I think it's fair to say that so far it definitely hasn't worked and is unlikely to work even if IMPRESS is recognised. The reason for this in my view is down to the government's failure to implement section 40 of the crime and courts act 2013. Without the cost shifting element of section 40 there is no incentive to be part of a recognised regulator and to offer low cost arbitration. The PRP should take the opportunity to remind Parliament that the Royal Charter has been sabotaged by this action of the Government.

*2. For publishers, joining an approved regulator is voluntary. For regulators, applying for Charter recognition is voluntary. In your opinion, what factors or **issues will affect regulators' and publishers' decisions when they** consider these choices?*

I think the answer to this question is the same as the answer to 1 above. Without the cost shifting provision of clause 40 there is no incentive for publishers to join a recognised regulator. Furthermore this leaves us in exactly the same situation as we were pre Leveson where challenging the press over anything was possible only by the **rich and powerful. I know I don't need to remind you that some of the worst breaches** involved people that were neither rich nor powerful. It really does seem to be business as usual for the press.

I urge the PRP to recommend to Parliament and the Government that section 40 is **"commenced"** immediately, as it is integral to the system of recognition & incentives system. It might also be wise to press for Leveson part 2 as this may **have the effect of raising this again in the public's mind which would probably** force the government to implement section 40 as they promised.

Many thanks Mick & Jackie Thomas