

PRP

INDEPENDENTLY
OVERSEEING
PRESS REGULATION

PRESS RECOGNITION PANEL

BUSINESS PLAN

2018/19

Chair's foreword



The Press Recognition Panel (PRP) was created following the Leveson Inquiry to independently oversee press regulation in the UK. Our Royal Charter gives us a unique independence, and we operate transparently as part of the system designed to balance the freedom of the press and the public interest. This business plan sets out our programme of work for the period 1 April 2018 to 31 March 2019.

In the previous financial year, we continued to oversee IMPRESS. After we recognised the approved regulator on 25 October 2016, the News Media Association (NMA) sought a Judicial Review of our decision. We robustly defended our assessment and on 12 October

2017 the High Court handed down its judgement in the case, which categorically and bluntly rejected all the NMA's arguments.

The judgement confirmed that we acted independently, transparently and correctly when we recognised IMPRESS, and we were pleased that the court noted the thoroughness of our assessment process.

We were awarded our costs and the NMA was refused permission to appeal the decision.

The NMA subsequently made an application to the Court of Appeal seeking permission to appeal the High Court verdict. We have filed a response and if the NMA is granted leave to appeal, we will again robustly defend our decision.

In November 2017, we published our second annual report on the recognition system. The report noted that section 40 of the Crime and Courts Act 2013 had not been commenced.

It continues to be our view that section 40 should be commenced immediately so that the recognition system is given an opportunity to operate and provide the intended public

intentions. Commencement would:

- Give everyone, not just the rich, access to legal remedies to challenge alleged press illegality;
- Protect the press from the chilling effect of threats of large legal costs by those who wish to stifle free speech and investigation; and
- Remove political influence from press regulation.

The delay commencing section 40 has paradoxically kept a political presence in place. Politicians should not be involved in press regulation, and full implementation of the recognition system would safeguard against that.

In November 2018, we will conduct our first cyclical review of IMPRESS' recognition as an approved regulator, as required by the Charter. Our process for cyclical reviews was developed following a public consultation. The process is published on our website, and it will involve a public call for information.

Chair's foreword

On behalf of the Board, I would like to thank all those who have taken part in our various public consultations and calls for information. We are also grateful to those who have met with us or corresponded with us to provide feedback and information. Their input has contributed to and shaped our work.

I would also like to thank our Chief Executive, Susie Uppal, and her exceptional team for their hard work and professionalism.

We remain keen to hear from anyone who has an interest in our work, including members of the public, campaign groups, media organisations, journalists, politicians, academics and commentators. If you are interested in meeting, please do get in touch.

We continue to work in the public interest to promote a free press in a free and fair society and are committed to independently overseeing an effective system of press self-regulation in the UK.

David Wolfe, Chair

Chief Executive's introduction



This business plan sets out the activities the Press Recognition Panel (PRP) will undertake in the 2018/19 financial year.

We have a dedicated Executive Team and have formed an organisation that is both efficient and flexible. We outsource some of our key functions and we will continue to work with trusted partners to achieve the objectives outlined in this plan, while achieving value for money.

We operate in a somewhat uncertain environment. The Government has announced that it intends to ask Parliament to repeal section 40 of the Crime and Courts Act

2013. Although this makes it challenging to plan, we will work flexibly to manage our limited resources and meet our Royal Charter obligations.

In 2018/19, we will continue to oversee IMPRESS, and maintain a proportionate level of active awareness of issues related to our work. We will also conduct the first cyclical review of IMPRESS' recognition as an approved regulator.

We have systems in place to receive feedback from third parties about approved regulators' compliance with the Charter's recognition criteria, and we will ensure that we continue to be able to receive and determine any further applications for recognition.

In 2018/19, we will continue to encourage, receive and consider feedback about our work and the recognition system. We will continue to meet with stakeholders on both a proactive and reactive basis to provide information about our organisation and the recognition system, and to address any misinformation.

We also write to the press and other stakeholders when we observe factual inaccuracies in what they say about our organisation and the recognition system.

We have published a document of myths about the recognition system and provided the facts. We will continue to update that document and share it with stakeholders.

In autumn 2018, we plan to publish our third report on the recognition system, as required by the Charter. As before, we will hold a public call for information and seek the views of others to help inform the report's conclusions.

I would like to thank the Board for their ongoing support, commitment and expertise which they willingly share with me and my team. Together we will deliver the objectives set out in this plan and work to defend the freedom of the press and protect the public.

Susie Uppal, Chief Executive

Our mission and values

The Press Recognition Panel is the independent body set up by Royal Charter to ensure that regulators of the UK press are independent, properly funded and able to protect the public. The PRP works in the public interest by supporting and promoting a free press in a free and fair society.

We will perform our duties:

INDEPENDENTLY - using to the full the complete freedom we have from state, government or any other interest, and expressing our views honestly and courageously

FAIRLY - guided by the principle of understanding the public interest and always putting it first

OPENLY - asking questions, using the widest possible range of evidence available to us to make our decisions, and explaining them clearly

TRANSPARENTLY - wherever possible holding our meetings in public, publishing our papers, and making our meetings formal and documented – ensuring that the public and those we serve can see how we are putting our principles into practice.

INCLUSIVELY - guided by the principles of equality and diversity as an employer, and in the way we work with colleagues and stakeholders, and in the way we conduct our business

Review of 2017/18

The Press Recognition Panel's (PRP) business plan for 2017/18 set out objectives for the year which reflected our focus on ensuring we operated effectively as an organisation and maintained effective oversight of approved regulators.

The News Media Association (NMA) sought a Judicial Review of our decision to recognise IMPRESS as an approved regulator and on 12 October 2017 the High Court handed down its Judgement in the case, which categorically rejected all of the NMA's arguments. We were awarded our costs and the NMA was refused permission to appeal the decision.

In 2017/18, political involvement in press regulation continued. Section 40 of the Crime and Courts Act 2013 was not commenced which meant that the recognition system had still not been fully implemented. The section 40 incentives are a key part of the recognition system and there is a clear link between the failure to implement the legislation and the limited number of relevant publishers that have joined or formed an approved regulator.

In spring 2017, we consulted on our fee charging framework, and in August 2017, we published the outcome. We also consulted on our process for variations submitted by approved regulators.

In the previous financial year, we operated our systems for maintaining proportionate and appropriate oversight of approved regulators, and we received, considered and responded to feedback from third parties.

We observed that some of those opposed to the new system of regulation sought to give a false impression of our organisation and the recognition system, so we responded to and addressed public misinformation about who we are, our work and our role. We issued media corrections, prepared briefings for stakeholders, and wrote to those who had shared misinformation publicly.

During the previous financial year, the Data Protection Bill progressed through the House of Lords, and it included matters concerning press regulation. We provided information to peers to ensure they were able to consider accurate information about the PRP and the

recognition system.

In 2018/19, we will continue to ensure that stakeholders have accurate information about us and the recognition system.

Our objectives for 2018/19

Our objectives for 2018/19 reflect our focus on ensuring we have the systems and processes in place to operate effectively as an organisation and meet our Royal Charter obligations.

We will:

1. Oversee approved regulators
2. Meet our ongoing reporting requirements
3. Receive applications for recognition
4. Use insight from those who have an interest in our work to inform what we do

We will do this by:

5. Develop a highly motivated, diverse and professional Executive Team
6. Ensuring our systems and processes are effective and continue to provide value for money.

What we will deliver in 2018/19

Objective 1 - Oversee approved regulators

To achieve this objective we will	Timetable
Continue to robustly defend the Board's decision to recognise IMPRESS, including against any legal action	Throughout the year
Operate a system for receiving complaints and feedback about approved regulator	Throughout the year
Determine approved regulator's ongoing compliance with the Charter criteria in the light of any changes they make to operations, or any concerns raised by third parties	Throughout the year
Conduct the first cyclical review of IMPRESS' recognition as an approved regulator	November 2018

Objective 2 - Meet our ongoing reporting requirements

To achieve this objective we will	Timetable
Publish our annual report and accounts for 2017/18	July 2018
Publish our third annual report on the recognition system	Autumn 2018
Publish reports on any ad hoc reviews carried out	Throughout the year
Regularly meet with stakeholders and provide them with written information on both a reactive and proactive basis	Throughout the year
Reactively correct misinformation about the PRP and circulate our myth-busting document	Throughout the year

What we will deliver in 2018/19

Objective 3 - Receive applications for recognition

To achieve this objective we will	Timetable
Ensure we continue to be in a position to receive and determine any future applications for recognition	Throughout the year
Provide pre-application advice to any regulator wishing to apply for recognition	Throughout the year

Objective 4 - Use insight from those who have an interest in our work to inform what we do

To achieve this objective we will	Timetable
Continue to meet stakeholders who have an interest in our work	Throughout the year
Maintain an awareness of the regulatory, press and public policy environments	Throughout the year

Objective 5 - Develop a highly motivated, diverse and professional Executive Team

To achieve this objective we will	Timetable
Recruit staff and appoint external partners fairly and openly and in accordance with our policies, including diversity and equality	When required
Work in a supportive, collaborative and flexible way	Throughout the year
Build on the knowledge of our executive team to enhance the quality of our work	Throughout the year
Ensure we have the right combination of skills and experience in our team at the right time to support delivery	Throughout the year

What we will deliver in 2018/19

Objective 6 - Ensuring our systems and processes are effective and provide value for money

To achieve this objective we will	Timetable
Review our communications strategy	March 2019
Produce and publish our business plan and budget for 2019/20	April 2019
Strive to achieve value for money on all goods and services purchased	Throughout the year
Ensure that our staff have the resources and support they need to work effectively	Throughout the year

Our equality objectives

1. We will ensure that the PRP complies with the Public Sector Equality Duty (s.149 of the Equality Act 2010)
2. We will ensure our consultation activity is inclusive and actively seeks the views of a diverse audience

Equality objective 1 - We will ensure that the PRP complies with the Public Sector Equality Duty (s.149 of the Equality Act 2010)

To achieve this objective we will	Timetable
Build consideration of equality and diversity into our everyday work and as we develop our systems and processes	Throughout the year
Monitor and report on progress against our equality objectives as part of our annual report and accounts	Throughout the year

Equality objective 2 - We will ensure our consultation activity is inclusive and actively seeks the views of a diverse audience

To achieve this objective we will	Timetable
Provide access to information and the ability to respond in different languages and formats when required	Throughout the year
Actively work to ensure a wide range of stakeholders feed into our work through our consultation and engagement activity	Throughout the year

Managing performance and risk

Governance

The functions of the PRP are determined by the Charter as public functions. We have established robust governance arrangements appropriate to our business, scale and culture. The arrangements combine efficient decision-making with accountability and transparency. The Board reviews its governance framework on an annual basis.

Organisational risk

We have a risk management policy and strategic risk register which is overseen by the Audit and Risk Committee and reviewed quarterly at board meetings.

The Board has agreed to take a cautious approach to managing risks and is mindful of risks to delivery, reputation and the operation of the organisation.

Reporting

Our Board meets regularly to oversee the delivery of the work set out in this plan. Regular reports on progress against our objectives are considered by the Board.

As set out in the Charter we will:

- Report annually to Parliament and the Scottish Parliament on our activities;
- Publish reports of any cyclical or ad hoc reviews we carry out;
- Publish a report on whether there is a recognised regulator and if, in the opinion of the PRP, the system of regulation covers all recognised publishers.

Although press regulation is a devolved matter, the Charter applies to the whole of the United Kingdom. When reporting to Parliament and the Scottish Parliament, we will also send copies of reports to the Welsh Assembly and the Northern Ireland Assembly.

Our finances

The PRP was created as a legal body on 3 November 2014. The Charter required the Exchequer to give the PRP sufficient money for it to set up and operate for its first three years. The Exchequer has granted the PRP £3m, and this has been received in full by the PRP.

In November 2017, following a public consultation, we will implement our fee-charging regime.

We constantly strive for the best value for money on the good and services it purchases, and in accordance with the Charter's requirement, the PRP's finances are managed in accordance with the general principles of Managing Public Money.

2018/19 expenditure budget

	£
Expenditure	
Board (salaries and expenses)	(64,812)
Communications	(14,680)
Operational costs	(357,883)
Total expenditure	(437,375)



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