

PRESS RECOGNITION PANEL BOARD MEETING

41st meeting of the Press Recognition Panel
 09:00, Tuesday 26 February 2019
 Mappin House, 4 Winsley Street, London W1W 8HF

AGENDA

Indicative timings

Public session

- | | | | |
|----|--|-------|---------------|
| 1. | Welcome | Chair | 09:00 |
| 2. | Apologies for absence | Chair | 09:00 |
| 3. | Declarations of interest | Chair | 09:00 |
| 4. | Minutes of the meeting held on 18 December 2018, outstanding actions and matters arising
<i>For noting</i> | Chair | 09:00 – 09:05 |
| 5. | Chief Executive’s report – February 2019
Paper PRP91(19)
<i>For noting</i> | SU | 09:05 – 09:15 |
| 6. | Finance report – January 2019
Paper PRP92(19)
<i>For noting</i> | SU | 09:15 – 09:20 |
| 7. | Governance procedures and policies review
Paper PRP93(19)
<i>For decision</i> | Chair | 09:20 – 09:30 |
| 8. | Board succession planning
Paper PRP94(19)
<i>For decision</i> | Chair | 09:30 – 09:40 |
| 9. | Any other business and close of public session
<i>Including comments from the floor</i> | Chair | 09:40 – 09:45 |

Confidential session

- | | | | |
|-----|--|-------|---------------|
| 10. | Minutes of the meeting held on 18 December 2018, outstanding actions and matters arising
<i>For noting</i> | Chair | 09:45 – 09:50 |
|-----|--|-------|---------------|

- | | | | |
|------------|--|-------|---------------|
| 11. | Draft business plan and budget 2019
Paper PRP95(19)
<i>For discussion</i> | SU | 09:50 – 10:00 |
| 12. | Risk register review
Paper PRP96(19)
<i>For decision</i> | SU | 10:00 – 10:10 |
| 13. | Any other business and close of meeting | Chair | 10:10 – 10:15 |

Date and time of next meeting: 26 March 2019, at Mappin House, 4 Winsley Street, London W1W 8HF, starting at 10:00.

PRESS RECOGNITION PANEL
Minutes of the 40th meeting of the Press Recognition Panel Board
held on 18 December 2018 at Mappin House, 4 Winsley Street, London W1W 8HF

Present: David Wolfe QC (Chair) Carolyn Regan Harry Rich, Harry Cayton and Emma Gilpin Jacobs

In attendance: Susie Uppal (Chief Executive), Saima Ansari, Paul Nezandonyi and John Speed

BOARD MEETING – PUBLIC SESSION

Welcome

1. The Chair **welcomed** Members and attendees to the fortieth meeting of the Press Recognition Panel.

Declaration of members' interests

2. There were no new interests to declare.

Minutes of the meeting held on 30 October 2018, outstanding actions and matters arising

3. The draft minutes of the meeting held on 30 October 2018 were **noted** as factually correct and **agreed** subject to a minor revision of paragraph 7.

Chief Executive's report – December 2018 – Paper PRP83(18)

4. The Board received a paper which provided an update on Executive activity since the November CEO report that had been circulated by email. The Board **noted** the interim November CEO report and supporting Annexes.
5. The Chair and the CEO had met with Dame Cairncross on 17 December 2018. The report on press sustainability was being finalised and

publication was anticipated for Spring 2019. The Chair had provided a summary on the importance of press regulation and the current position. It was noted that whilst parts of the press were averse to bringing themselves in line with the agreed system of regulation already in place, they were keen on ensuring that social media was suitably regulated.

6. redacted
7. The Board **noted** with thanks the contents of the Chief Executive's report.

Finance report – November 2018 – Paper PRP84(18)

8. The Board **noted** the latest financial position as at 30 November 2018.

Arrangements for Board succession planning – appointment and reappointment of Board members – Paper PRP85(18))

9. The Board considered a paper that set out the high-level principles for the reappointment process for serving members and the process for the future appointment of the Board. The members confirmed that they were content to continue in their roles as required to support the organisation.
10. The Board **agreed** that Harry Rich should be a member of the Nominations Committee, alongside the Chair and the Independent member Cindy Butts, to provide additional robustness to the appointments process. Cindy, having been competitively recruited earlier in the year, provided strong independence and impartiality.
11. The Board **agreed** the high-level principles underpinning the reappointments process and that the Nominations Committee will bring recommendations to the Board concerning the reappointment of the Board in February 2019.
12. The Board **agreed** in principle that the recruitment activity for the Chair and Board appointments will be condensed to be undertaken in the agreed years in order to minimise costs and ensure effective campaigns, taking into account the end of the staggered second periods of appointment.
13. The Board **agreed** that the Nominations Committee should consider the high-level principles that will underpin the recruitment process and provide details of the proposed recruitment campaign and timeframes for consideration by the Board in February 2019.
14. It was **noted** that the correspondence concerning the future Board appointments had been received from the Civil Service Commissioner's

office following delegated authority from the current Commissioner for Public Appointments. The Commissioner for Public Appointments has held previous roles as a journalist and editor with press media organisations and the delegation to the Civil Service Commissioner removed any perception of conflict of interest.

Board and Independent members' remuneration – Paper PRP86(18)

15. The Board agreed that the remuneration rates should remain unchanged for the Board and Independent members. Harry Cayton, as the Senior Independent Board member, discussed the Chair's remuneration, once the Chair had been excused from the room, and the Board were content that the Chair's remuneration continued to remain appropriate.

Any other business and close of public session

16. None raised.

BOARD MEETING – CONFIDENTIAL SESSION

Minutes of the meeting held on 30 October 2018, outstanding actions and matters arising

17. The confidential section of the draft Minutes were recorded as factually **correct** and **agreed**.

Draft report on the recognition system 2018 – Paper PRP87(18)

18. - redacted
- 19.

ARC verbal update

- 20.– redacted
- 22.

Quarterly Risk register review – Paper PRP88(18)

23. redacted
24. The Board discussed the Treasury's decision to bring the PRP within the MOJ's Departmental Boundary for accounting purposes. The ARC had raised concerns about the implications of this decision and regarded it as an erroneous position. The Board **agreed** that as the PRP is constitutionally independent, it is inappropriate for the PRP to be listed

under a government department, notwithstanding the justifications provided to date. The Board **agreed** with the Committee's recommendation that the Chair should write to the Treasury formally noting the Treasury's decision and explaining that we do not agree as this does not reflect our status as independent from government.

25. Post meeting note: The Chair wrote to the Permanent Secretary of the Treasury on 20 December 2018 and the letter was published on our website.

Board evaluation – Paper PRP89(18)

- 26.– Redacted
- 32.

33. The Board action plan would be updated in line with the discussions.

Any other business and close of confidential session

34. None raised.

Date and time of next meeting

35. The next scheduled meeting of the Board will take place at 09:00 on 26 February 2019 at Mappin House, 4 Winsley Street, London W1W 8HF.

Drafted: Saima Ansari
Executive Administration Manager

Signed: David Wolfe QC
Chair



PRESS RECOGNITION PANEL BOARD

CHIEF EXECUTIVE'S REPORT – FEBRUARY 2019

Meeting: 26 February 2019

Status: for noting

Lead responsibility: Susie Uppal,
Chief Executive

Contact details: 020 3443 7072

Purpose

1. The purpose of this paper is to provide an update to the Board on Executive activity since the January CEO report and finance update circulated by email (PRP90(19) – attached at Annex A for information).
2. The Board is invited to **note** the contents of the Chief Executive's report.

Executive summary

3. The Board is being updated in respect of organisational and financial matters.

Delivery updates

Cyclical Review

4. The Executive is evaluating the evidence provided by IMPRESS and this will be considered by the Board during the public session of its meeting on 26 March 2019.

Report on the Recognition System 2019

5. The final report was laid in Westminster and the Scottish Parliament on 12 February 2019 with copies provided to the Welsh and Northern Irish Assemblies. The report was sent to stakeholders on our email database, published on our website and shared on Twitter. We also issued a press release about the publication.

Research update

6. Annex B includes an update on key external matters relevant to our work.

Implications

7. The implications of decisions taken by the Board as set out in this paper are as follows:
- Budget – There are no specific implications in addition to the issues referenced.
 - Legislation – no specific implications.
 - Resources – any resourcing considerations are referenced and there are no specific implications other than these.
 - Equality, Diversity and Inclusion – no specific implications.

Devolved nations

8. There are no implications/differences in relation to the areas of work covered in this paper and the devolved nations.

Communications

9. There are no other issues to report which have communications implications, so far as I am aware.

Risks

10. There are a range of risks involved in the areas of work covered in this Paper.

Recommendations

11. The Board is asked to **note** the contents of the Chief Executive's report.

Attachments

Annex A – January CEO Report (PRP90(19))

Annex B - External Matters Update



PRESS RECOGNITION PANEL BOARD

CHIEF EXECUTIVE'S REPORT – JANUARY 2019

Meeting: by email

Status: for noting

Lead responsibility: Susie Uppal,
Chief Executive

Contact details: 020 3443 7072

Purpose

1. The purpose of this paper is to provide an update to the Board on Executive activity since the CEO report noted during the Board meeting held on 18 December 2018.
2. The Board is invited to **note** the contents of the Chief Executive's report.

Executive summary

3. The Board is being updated in respect of organisational and financial matters.

Delivery updates

Judicial Review

4. We have now received the sealed order from the Court of Appeal. The NMA's appeal has been dismissed and they were ordered to pay our costs (see paragraph 11 below for details).
5. We have written to our stakeholders to update them on this.

Cyclical Review

6. IMPRESS has provided their submission and supporting evidence for the Cyclical Review.
7. The Call for Information closed on 9 January 2019. No responses were received.
8. The Executive is presently evaluating the evidence provided by IMPRESS and this will be considered by the Board during the public session of its meeting on 26 March 2019.

Finance Update

9. A bank-reconciled set of management accounts as at 31 December 2018 is attached at Annex A. The management accounts also include the 6-month reforecast carried out in October 2018.
10. The deficit for the period to date is £77,122 against the year to date forecast of £94,041. This represents a positive variance of £16,919 compared to the year to date forecast.
11. In dismissing the NMA's appeal on 15 January 2019, the Court of Appeal ordered the NMA to pay the sum of £46,166.34 in full and final settlement of the costs incurred by the PRP before the Divisional Court and the Court of Appeal within 14 days. Full payment was received from the NMA on 24 January 2019. This income will now be recognised in the management accounts.
12. The Board is invited to **note** the latest position regarding the PRP's finances.

Report on the Recognition System 2018

13. redacted
14. redacted
15. redacted

Media inquiries and parliamentary activity

16. As I have reported previously, it was brought to our attention that the Ministry of Justice have stated in their departmental accounts that from 1 April 2018, the Press Recognition Panel (PRP) has been designated as within the 'Departmental Boundary' following a decision by HM Treasury.
17. On 20 December 2018, the Chair wrote to the Permanent Secretary at HM Treasury to inform them that the PRP is independent of the Government, government departments and indeed any other body. As such, the PRP should not be included in any 'departmental boundary'.
18. As part of our commitment to openness and transparency, the letter was published on our website and we subsequently received media enquiries about it. In response, the Chair provided the following statement:

"The independent PRP was created by a Royal Charter which ensures we remain separate from Government, Government departments, the press or any indeed other body.

We should not be included in any 'Departmental Boundary', not least because it risks giving the false impression that there is some kind of ongoing relationship

between us and the Government or a Government department. We have written to the Treasury to tell them this.

We have not been included in any 'Departmental Boundary' previously and it is unclear why we have now been."

19. On 14 January 2019, Ian C Lucas MP (Labour, Wrexham), asked the Secretary of State for Justice, why the Press Recognition Panel was added to his Ministerial responsibilities; and what assessment he has made of the effect of that decision on the work of the Panel.

20. Edward Argar MP, (Conservative, Charnwood, Parliamentary Under-Secretary (Ministry of Justice)), has responded as follows:

"The Royal Charter establishing the Press Recognition Panel sets out the responsibilities of the Lord Chancellor. Other than in his role as Lord Chancellor, the Secretary of State for Justice does not have any ministerial responsibilities in respect of the Panel.

HM Treasury determined that the Press Recognition Panel should fall under the Ministry of Justice Departmental Boundary for Estimates and Accounts purposes, this is purely an administrative action. There is no change [*sic*] in terms of the Lord Chancellor's responsibilities as set out in the Royal Charter, and the Panel remains outside the Secretary of State's responsibilities."

Research update

21. Annex B includes an update on key external matters relevant to our work.

Implications

22. The implications of decisions taken by the Board as set out in this paper are as follows:

- Budget –There are no specific implications in addition to the issues referenced.
- Legislation – no specific implications.
- Resources – any resourcing considerations are referenced and there are no specific implications other than these.
- Equality, Diversity and Inclusion – no specific implications.

Devolved nations

23. There are no implications/differences in relation to the areas of work covered in this paper and the devolved nations.

Communications

24. There are no other issues to report which have communications implications, so far as I am aware.

Risks

25. There are a range of risks involved in the areas of work covered in this Paper.

Recommendations

26. The Board is asked to **note** the contents of the Chief Executive's report.

Attachments

Annex A – Management accounts as at 31 December 2018

Annex B - External Matters Update

Press Recognition Panel
Period ended 31 December 2018

	9 Months to December 2018			Full year to March 2019	
	Reforecast			Budget	Reforecast Oct 2018
	Actual	Oct 2018	Variance		
	£	£	£	£	£
Income					
Subscription Fees	165,753	165,753	-	220,000	220,000
Bank Interest	1,683	1,269	(414)	1,133	1,659
Total Income	167,436	167,022	(414)	221,133	221,659
Expenditure					
Board costs					
Board Salaries & NIC	46,604	46,944	(340)	64,572	62,675
Board Travel & Subsistence	48	108	(60)	240	168
Total Board Costs	46,652	47,052	(400)	64,812	62,843
Communications					
Consultation Document & Translation	-	9,600	(9,600)	12,200	10,900
Website & Visuals	1,265	1,260	5	2,480	1,680
Total Communications Costs	1,265	10,860	(9,595)	14,680	12,580
Other costs					
Executive team costs	127,471	133,137	(5,666)	226,083	185,734
HR & Recruitment	3,763	4,042	(279)	8,884	5,336
Office costs	30,526	29,997	529	42,021	31,716
Meeting rooms	5,003	5,097	(94)	3,200	5,897
Travel & Subsistence	125	185	(60)	240	245
Information Technology	3,035	3,363	(328)	2,976	4,107
IT hardware	-	1,000	(1,000)	2,000	1,000
Accountancy	15,652	15,657	(5)	23,882	24,015
Audit Fees	60	60	-	12,000	12,060
Printing & Stationery	2,159	2,270	(111)	3,880	2,465
Insurance	1,494	1,540	(46)	2,724	2,626
Legal	2,862	2,544	318	30,000	30,000
Subscriptions & publications	3,851	3,845	6	6,960	4,355
Finance charges	114	114	-	120	144
Sundry expenses	526	300	226	227	632
	196,641	203,151	(6,510)	365,196	310,332
Total Expenditure	244,558	261,063	(16,505)	444,688	385,755
(Deficit) for the period	(77,122)	(94,041)	16,919	(223,555)	(164,097)
Reserves Bfwd	860,393	860,393		860,393	860,393
Reserves Cfwd	783,271	766,352		636,838	696,296

Press Recognition Panel
Period ended 31 December 2018

	Dec-18		Mar-18	
	£	£	£	£
Current Assets				
Current account	105,884		87,076	
Barclays account	757,403		805,827	
Cash at bank		863,287		892,903
Prepayments	3,817		12,718	
Outstanding fees	-		110,000	
Accrued Income	266		182	
Third Party Deposit	5,609		7,666	
Sundry debtors		9,692		130,566
Creditors: amounts falling due within one year				
Trade creditors	1,953		5,502	
Deferred income	75,041		130,795	
Credit card	-		64	
Social security and other taxes	5,614		5,632	
Pensions	1,844		1,035	
Sundry creditors and accruals	5,256		20,048	
		89,708		163,076
Net Current Assets		783,271		860,393
Funds brought forward				
Funds bought forward at 31 March		860,393		1,246,359
Surplus/(deficit) for the period		(77,122)		(385,966)
		783,271		860,393

Update on key external matters

1. The update on key external matters is a research-informed piece based on a sample of information available in the public domain.

Commercial Landscape

2. The BBC and others reported that the Times and the Sunday Times are asking the government for permission to share resources, including journalists, between the two titles. The application to the Department for Digital, Culture, Media and Sport (DCMS) is necessary as legal undertakings were made to keep them separate when he bought them in 1981. The DCMS is seeking public views on whether the changes are warranted.
3. Press Gazette reported that BBC-funded local democracy reporters (LDRs) have filed 50,000 news stories in the scheme's first year, although the scheme has yet to fill every role. LDRs are contracted by a specific publisher as part of the Local News Partnership between the BBC and News Media Association, launched to support local journalism and increase scrutiny of public bodies.
4. Press Gazette also reported that Facebook has launched a UK arm to its international fact-checking initiative following more than two years of criticism about how the social network has handled the spread of misinformation on its platform. Full Fact, a fact-checking charity founded in 2010, will review stories, images and videos which have been flagged by users and rate them based on their accuracy.
5. The publisher of the Sun and the Sun on Sunday has more than tripled its pre-tax losses to £91.2m in 2018. The Times reported that increased turnover and reduced expenses helped the publisher of The Times and The Sunday Times to make an annual after-tax profit of £9.6 million, compared with a loss of £8 million in the previous financial year.
6. The i newspaper has announced that it will run articles from The Economist, both in print and online, as part of a new deal between the two publications. The agreement will see the i carry an average of two Economist stories a week, ranging from politics to culture.

Legal and regulatory

7. The Guardian reported that the couple arrested and released without charge in relation to the Gatwick drone incident could win at least £75,000 from the newspapers who identified them. The couple were identified in many newspapers and the Mail on Sunday ran the couple's picture on its front page next to the headline: "Are these the morons who ruined Christmas?"

8. Following this Anna Soubry MP stated her view that couple should not have been named in the media and that a new law was needed to make it a criminal offence to name suspects before charge unless it is in the interests of justice.

Political

9. Press Gazette reported that Prime Minister Theresa May met with newspaper editors from nearly every major pro-Brexit newspaper over the summer, including both the current and former editors of the Daily Mail. May's meetings with the Sun, Telegraph, Mail and Spectator were revealed in transparency data. She did not however meet with the Express. The Times, Guardian and Mirror editors were also not listed

Update on key external matters

1. The update on key external matters is a research-informed piece based on a sample of information available in the public domain.

Commercial Landscape

2. Press Gazette reported that advertising spend on national and regional newsbrands is set to fall this year – despite growing digital ad expenditure – while radio and internet ad revenues are set to increase. Overall ad spend on national newsbrands is set to drop by 2.3 per cent in 2019, despite a predicted 8.1 per cent increase in digital ad spend. Similarly, regional newsbrands will see ad spend fall by 4.4 per cent, despite 9.3 per cent digital ad growth, it has been forecast.

Legal and regulatory

3. Shadow Justice Secretary Richard Burdon has won a High Court libel battle against the Sun over an article claiming he had joined a band that “delights in Nazi symbols”. The MP for Leeds East was awarded £30,000 in damages. The judge in the case also granted an injunction to stop further publication of the claims.

Political

4. The Cairncross Review into the future of the UK news industry has delivered its final report, with recommendations on how to safeguard the future sustainability of the UK press. Recommendations in the report include:
 - Online platforms should have a ‘news quality obligation’ to improve trust in news they host, overseen by a regulator
 - Government should explore direct funding for local news and new tax reliefs to support public interest journalism
 - A new Institute for Public Interest News should focus on the future of local and regional press and oversee a new innovation fund. The chair of the new Institute should be appointed in a manner that was indubitably free from government influence. One model for the process might be the approach taken for appointments to the Press Recognition Panel. By the same token, government funding in the form of an endowment may be preferable to grant-in-aid, in light of the need for the Institute to be as independent as possible.
5. The report notes the PRP’s view that section 40 of the Crime and Courts Act should be commenced and that if fully implemented, the new system of regulation would protect publishers and support freedom of speech. It would increase sustainability of the press by:

- a. Protecting ordinary people, not just the rich, and thereby increasing public confidence;
 - b. Protecting the press from the chilling effect of large legal costs; and
 - c. Removing political influence on press regulation
6. The report also notes that others disagree.
7. Shadow culture secretary, Tom Watson, announced that Labour would establish a new standalone internet regulator with the power to fine tech companies that fail in their duty of care to children. If it wins the next election, the party wants penalties for companies that fail to safeguard children to be on a similar scale to those following data breaches. Depending on their revenue, firms can be fined many billions of pounds.
8. Ministers are considering redefining the role of social networks to hold them directly liable for the content that gets published on their platforms, in effect enshrining them as publishers in law. The government has announced proposals to crack down on the companies, saying that it will introduce laws that force social media platforms to remove illegal content, and to prioritise the protection of users beyond their commercial interests.
9. The science and technology committee has concluded that social media companies must be subject to a legal duty of care to help protect young people's health and wellbeing when accessing their sites. Norman Lamb, the committee's chair, said that "social media companies – who have a clear responsibility towards particularly young users – seem to be in no rush to share vital data with academics that could help tackle the very real harms our young people face in the virtual world."



PRESS RECOGNITION PANEL BOARD

FINANCE REPORT – JANUARY 2019

Meeting: 26 February 2019

Status: for noting

Lead responsibility: Susie Uppal, Chief Executive

Contact details: Susie Uppal, Adam Gibbs (JS2)

Purpose

1. The purpose of this paper is to update the Board on the finance and banking position as at 31 January 2019.
2. The Board is invited to **note** the latest financial position.

Background and analysis

3. A bank-reconciled set of management accounts as at 31 January 2019 is attached at Annex A. The management accounts also include the 6-month reforecast carried out in October 2018.
4. The deficit for the period to date is £37,561 against the year to date forecast of £128,704. This represents a positive variance of £91,143 compared to the year to date forecast.
5. As previously reported, the High Court Judgement arising from the Judicial review awarded the PRP full costs that were incurred on the case. Counsel's fees and associated costs (excluding staff time) of £30,670 were incurred in total. The NMA has now repaid those costs, along with additional internal costs relating to the Judicial Review. The agreed total repayment to the PRP was £46,166.34. This has been recognised in the management accounts.
6. The Board is invited to **note** the latest position regarding the PRP's finances.

Devolved Nations

7. There are no specific implications/differences in relation to the areas of work covered in this paper and the devolved nations.

Communications

8. There are no specific communications implications to draw out.

Risks

9. A robust and defensible position in relation to the PRP's finances is required in order to avoid reputational damage and to ensure compliance with *Managing Public Money*.

Recommendations

10. The Board is asked to **note** the latest financial position.

Timeline for future work

11. JS2 Ltd will continue to provide updates on the PRP's financial position at meetings of the Board.

Attachment

Annex A – Management accounts as at 31 January 2019

Press Recognition Panel
Period ended 31 January 2019

	10 Months to January 2019			Full year to March 2019	
	Reforecast			Budget	Reforecast Oct 2018
	Actual	Oct 2018	Variance		
	£	£	£	£	£
Income					
Subscription Fees	184,438	184,438	-	220,000	220,000
Bank Interest	1,916	1,404	(512)	1,133	1,659
Judicial Review costs reimbursed	46,166	-	(46,166)	-	-
Total Income	232,520	185,842	(46,678)	221,133	221,659
Expenditure					
Board costs					
Board Salaries & NIC	51,748	52,087	(339)	64,572	62,675
Board Travel & Subsistence	48	128	(80)	240	168
Total Board Costs	51,796	52,215	(419)	64,812	62,843
Communications					
Consultation Document & Translation	-	9,600	(9,600)	12,200	10,900
					State of Recognition report costs not yet incurred
Website & Visuals	1,408	1,400	8	2,480	1,680
Total Communications Costs	1,408	11,000	(9,592)	14,680	12,580
Other costs					
Executive team costs	144,288	150,360	(6,072)	226,083	185,734
HR & Recruitment	4,346	4,589	(243)	8,884	5,336
Office costs	30,962	30,570	392	42,021	31,716
Meeting rooms	5,003	5,097	(94)	3,200	5,897
Travel & Subsistence	142	205	(63)	240	245
Information Technology	3,371	3,611	(240)	2,976	4,107
IT hardware	24	1,000	(976)	2,000	1,000
Accountancy	17,336	17,343	(7)	23,882	24,015
Audit Fees	60	60	-	12,000	12,060
Printing & Stationery	2,159	2,335	(176)	3,880	2,465
Insurance	1,662	1,722	(60)	2,724	2,626
Legal	2,862	30,000	(27,138)	30,000	30,000
					£30k provision not fully utilised
Subscriptions & publications	4,060	4,015	45	6,960	4,355
Finance charges	121	124	(3)	120	144
Sundry expenses	481	300	181	227	632
	216,877	251,331	(34,454)	365,196	310,332
Total Expenditure	270,081	314,546	(44,465)	444,688	385,755
(Deficit) for the period	(37,561)	(128,704)	91,143	(223,555)	(164,097)
Reserves Bfwd	860,393	860,393		860,393	860,393
Reserves Cfwd	822,832	731,689		636,838	696,296

Press Recognition Panel
Period ended 31 January 2019

	<u>Jan-19</u>		<u>Mar-18</u>	
	£	£	£	£
Current Assets				
Current account	127,442		87,076	
Barclays account	<u>757,652</u>		<u>805,827</u>	
Cash at bank		885,094		892,903
Prepayments	3,375		12,718	
Outstanding fees	-		110,000	
Accrued Income	249		182	
Third Party Deposit	<u>5,609</u>		<u>7,666</u>	
Sundry debtors		9,233		130,566
Creditors: amounts falling due within one year				
Trade creditors	1,215		5,502	
Deferred income	56,356		130,795	
Credit card	-		64	
Social security and other taxes	5,614		5,632	
Pensions	1,380		1,035	
Sundry creditors and accruals	<u>6,930</u>		<u>20,048</u>	
		71,495		163,076
Net Current Assets		<u><u>822,832</u></u>		<u><u>860,393</u></u>
Funds brought forward				
Funds bought forward at 31 March		860,393		1,246,359
Surplus/(deficit) for the period		(37,561)		(385,966)
		<u><u>822,832</u></u>		<u><u>860,393</u></u>



PRESS RECOGNITION PANEL BOARD

ANNUAL GOVERNANCE PROCEDURES AND POLICIES REVIEW

Meeting: 26 February 2019

Status: for approval and decision

Lead responsibility: David Wolfe,
Chair and Susie Uppal,
Chief Executive

Contact details: Saima Ansari

Purpose

1. This paper reviews the first tranche of the PRP's procedures and policies as part of the 2019 annual review.

Background and analysis

2. The PRP presently has 30 organisational procedures and policies in place that have been reviewed in line with best practice and with a greater focus on operation in practice. The Board will recall that a thorough revision was undertaken in February and April 2018 and proposed amendments now identified, aim to ensure currency and provide greater clarity where necessary. The proposed revisions are briefly summarised at Annex A, with the relevant documents to be considered detailed in the attached Appendices. Proposed revisions are marked in tracked changes where appropriate.
3. The main legislative change that has been considered is the Data Protection Act 2018 and the Board's privacy statement and procedures were updated in preparation for the introduction of the Act last year. All stakeholders on our list were also contacted at the time and the data held was updated as necessary.
4. The ARC terms of reference, risk management policy, anti bribery, money laundering, fraud and theft policy, data protection policy, privacy statement, retention and disposal policy, business continuity policy and emergency and recovery plan will be considered by the ARC in its meeting in March 2019. These will be brought to the Board ex committee in April for consideration and ratification and are not included in the Appendices. The Board will also be

provided with the corporate social responsibility policy in April as the policy will be updated to reflect the objectives for 2019/20 (as agreed in the Business Plan and Communications Strategy).

5. The Board agreed the Nominations Committee's TORs in February 2016 and reviewed these again in February 2017. It is recommended that the Nominations Committee formally review their TORs at their next meeting to ensure that they remain fit for purpose.
6. The Board will be aware that the role of the Senior Independent Board Member was updated to clarify that the Senior Independent Board Member will chair the Nominations Committee when the appointment concerns the chairmanship of the PRP Board. Under the TORs for the Nominations Committee, the Chair of the Board will chair the Nominations Committee unless the Committee is dealing with the succession matters for the PRP Board Chair.

Devolved Nations

7. There are no specific issues identified at this stage of the Paper.

Communications

8. The governance procedures and policies are published on the PRP's website. As these are reviewed and ratified, they will be updated on the website.

Risks

9. There are significant reputational and organisational risks if the PRP does not adopt adequate governance procedures and policies and maintain and review these on a regular basis. The ARC continues to keep the requirement for an internal audit under regular review. At present, the Committee have agreed that in view of the size and relative lack of complexity of the PRP and the control issues in place, an internal audit will not be commissioned. This matter continues to be reviewed annually by the Committee.

Recommendations

10. The Board is invited to:
 - a) Consider and agree the proposed revisions to the procedures and policies as set out in Annex A and in the Appendices;

- b) Note that the second tranche of policies and procedures (ARC TORs, Risk Management, Anti-bribery, money laundering, fraud, theft and corruption, data protection policy, privacy notice, retention and disposal policy, business continuity and disaster and recovery plan and corporate social responsibility will be brought to the Board ex committee in April 2019 for consideration; and
- c) Note that the Nominations Committee will consider its TORS at its next meeting.

Policy	Proposed Revision
Information & Communications	
Publication Scheme Appendix 1	This Scheme has been reviewed in line with the ICO's model publication scheme and remains unchanged from last year's review. The amendments reflect current publications available to the public and how they can be accessed.
Board & Executive	
Board Remuneration Appendix 2	Policy updated to reflect decision of Board in its December 2018 meeting. It is recommended that the policy title also includes Independent members.
Equality, diversity and inclusion Appendix 3	For general review – no change recommended
Gifts, hospitality and Expenses Appendix 4	Minor amendment to update details of resources and to clarify the approved HMRC mileage rates.
Rules & Procedures	
Rules of procedure for meetings Appendix 5	For general review – no change recommended.
Purpose	
Mission and Approach Appendix 6	For general review – no change recommended.
Working in Northern Ireland and Scotland Appendix 7	For general review – no change recommended.
Arrangements for fixing the PRP's seal Appendix 8	For general review – no change recommended.
Finance & Risk	
Finance Appendix 9	Technical update to reflect operational limits in place.
Procurement Appendix 10	For general review – no change recommended.
Scheme of delegation and matters reserved Appendix 11	Minor technical updates.
Investment Appendix 12	For general review – no change recommended.
When things go wrong	
Disciplinary procedures for Chair and Board Members	Updated to reflect operational practice.

Appendix 13	
Complaints handling policy (about a PRP individual) Appendix 14	For general review – no change recommended
Whistleblowing policy (Board and staff) Appendix 15	For general review – no change recommended.
Data handling	
Freedom of Information Appendix 16	Minor technical updates.
Business Continuity	
IT policy Appendix 17	Minor technical updates.
Health and Safety Appendix 18	Updated to reflect current operational practise.
Terms and Conditions of Service / Terms of Reference	
Board Appendix 19	For general review – no change recommended.
Independent Members Appendix 20	For general review – no change recommended.
Senior Independent Board Member Appendix 21	For general review – no change recommended.



Publication Scheme

[Recommendation: Minor technical update to list of policies.](#)

A guide to the information made available routinely by the PRP

Introduction

1. PRP's publication scheme sets out the information that we will routinely and proactively make available to the public, and where that information is available. We welcome all comments and suggestions on the scheme.

What information is made available routinely by the PRP?

2. The PRP makes a significant amount of information routinely available to the public on the basis that we are committed to operating with the maximum degree of openness and transparency in all our dealings – for example, where possible, our Board discussions are open to the public and we publish our Board papers on our website. In the majority of cases, the information that you will be looking for will already be available on our website. Information that is not published under this scheme can be requested in writing and this will be considered in accordance with the provisions of the Freedom of Information Act.

3. Our core functions and corporate structures are such that some information will not be made available routinely. It may not be appropriate – and in some cases, it may be misleading or confusion – to release information at an early stage, for example during the very early development stage of a new policy or process. Once the Board has come to an initial view about policy proposals, we will either consult on these, and share our thinking with stakeholders and the wider public, in line with our Mission and Approach (if it is a significant policy related to our responsibilities under the Royal Charter) or discuss the proposals further in an open meeting of our Board.

4. Even though we are not a non-departmental public body, for convenience, this document has been structured according to the seven classes of information in the Information Commissioner's Model Publication Scheme for non-departmental public bodies. The information that we will make available is grouped under seven classes of information:

- Who we are and what we do;
- What we spend and how we spend it;
- What our priorities are and how we are progressing these;

- How we make decisions;
- Policies and procedures;
- Lists and registers;
- Services we offer

5. If you would like a hard copy of information available, please contact: us at PRP, Mappin House, 4 Winsley Street, London, W1W 8HF
 Telephone number: 020 3443 7072
 prp@pressrecognitionpanel.org.uk

6. If you ask for information that is available on our website to be provided in paper format, it may be necessary for us to make a charge. For example, if a large amount of photocopying or printing is required, or if the cost of postage of a large volume of paperwork is very high, a charge is more likely to be made. You will be notified in advance of any actual charges.

Is the information available in other languages and other formats?

7. Most information is available in English. We will also consider, on request, providing copies of material in other languages.

8. We will supply information in alternative formats where, through reason of disability, standard electronic or hard copy documents may not be accessible. When making a request, please let us know how you would like the information communicated to you – we will do our best to comply.

9. Please note that providing information in other languages and in alternative formats may take longer than otherwise would be the case.

Our information

10. Who we are and what we do – organisational information, structures, location and contacts.

Information	Format
Role and responsibilities of the PRP	Online Printed copy from website
Information about our role, function and powers FAQs The Leveson Report Board Members and staff	
Organisational structure of the PRP	
Information on our internal structure	available on request

The location and contact details for the PRP	Online Printed copy from website
Legislation	
The Royal Charter	Online Printed copy from website
Organisations we work with	
Information relating to the organisations that we work with: <ul style="list-style-type: none"> - The recognised Regulator and link to their website - Details of meetings with stakeholders 	Online Printed copy from website

11. What we spend and how we spend it – financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit

Information	Format
<ul style="list-style-type: none"> - Annual report and accounts - Monthly finance reports - Annual business plans 	Online Printed from website

12. What our priorities are and how we are progressing these – strategies and plans, performance – strategies and plans, performance indicators, audits, reviews

Information	Format
<ul style="list-style-type: none"> - Annual business plans - Annual report and accounts - Annual reports on the recognition system 	Online Printed copy from website

13. How we make decisions – decision-making processes and records of decisions

Information	Format
Guidance and procedures relating to recognition Guidance for applicants Our fee charging scheme PRP Board’s indicative view on some elements of the Charter Guidance on cyclical and ad hoc reviews Board papers provided for consideration at Board meeting Minutes of Board meetings Board decision report on IMPRESS	Online Printed copy from website
Public Consultations – consultation papers and the results of the consultation	Online Printed copy from website
<ul style="list-style-type: none"> - Consultation on proposals for recognition - Consultation on cyclical and ad hoc reviews - Consultation on amendments to our guidance on cyclical and ad hoc reviews - Consultation on fees decision report 	Online Printed copy from website

14. Our policies and procedures – current written protocols, policies and procedures for delivering our functions and responsibilities

Information	Format
Board and Executive: 1. Terms and Conditions of Service for Board members and Independent members 2. Board remuneration 3. Equality, diversity and inclusion 4. Antibribery, money laundering, fraud, theft and corruption 5. Gifts, hospitality and Expenses	Online Printed copy from website

<p>6. Rules and Procedures for Board meetings</p> <p>7. Audit and Risk Committee – terms of reference</p> <p>8. Nominations Committee – terms of reference</p> <p>Purpose:</p> <p>9. Mission and Approach</p> <p>10. Corporate social responsibility</p> <p>11. Working in Northern Ireland and Scotland</p> <p>12. Arrangements for fixing the PRP’s seal</p> <p>Finance</p> <p>13. Finance</p> <p>14. Procurement</p> <p>15. Scheme of delegation and matters reserved</p> <p>16. Investment Policy</p> <p>When things go wrong:</p> <p>17. Disciplinary procedures for Chair and Board Members</p> <p>18. Complaints handling policy (about a PRP individual)</p> <p>19. Whistleblowing policy (Board and staff)</p> <p>Information security/ Business Continuity:</p> <p>20. Freedom of Information Act policy</p> <p>21. Data Protection Act policy</p> <p>22. Data retention and disposal policy</p> <p>23. IT policy</p> <p>24. Business Continuity</p>	
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15. Lists and registers – currently maintained lists and registers

Information	Website links
Disclosure logs:	Online

A log indicating what information has been provided in relation to an FOI request	Printed copy from website
Register of interests: Register of interests of Board members	Online Printed copy from website
Register of interests of senior staff	Available on request
Register of gifts: Register of offers of gifts and hospitality provided to Board members and senior personnel	No offers of gifts and hospitality received

16. The service we offer – information about the services we currently provide, including leaflets and guidance

Information	Format
<ul style="list-style-type: none"> - Guidance for applicants - Policy advice - Preliminary discussions with prospective regulators - Our fee charging scheme - PRP Board’s indicative view on some elements of the Charter - Guidance on cyclical and ad hoc reviews - Complaining about a recognised Regulator - Myths and Facts factsheets - Media releases - Stakeholder engagement 	<p>Online</p> <p>Printed copy from website or available on request</p>

For further assistance or guidance, please email: prp@pressrecognitionpanel.org.uk or write to us at the following address: PRP, Mappin House, 4 Winsley Street, London W1W 8HF

Agreed by the PRP Board, December 2015
Reviewed and updated by the PRP Board, January 2017
Reviewed and updated by the PRP Board, February 2018



Policy on Board **and Independent** Members remuneration

Recommendation: Update to reflect Board decision on 18 December 2018.

1. The Royal Charter (para 5.3) sets out that ‘The Board may make arrangements to pay or make provision for paying, in respect of any Member, such amounts by way of allowances or gratuities as the Board determines. The amount of any such allowances or gratuities shall be set having regard to the prevailing rates payable to the members of boards of public sector bodies’.
2. Having considered a detailed report on the prevailing rates paid to members of public sector boards, at its meeting in December 2014, the Board agreed:
 - a rate payable to the Chair of £30,000 per annum for a minimum time commitment of 60 days, with effect from 3 November 2014 and
 - a rate payable to Board Members of £6,000 per annum for a minimum time commitment of 20 days a year, with effect from 3 November 2014.
3. The Board reviewed the remuneration rates at its meeting in December 2017 and agreed that the rates set in December 2014 should not change, other than an increase to £2,500 for Board member Harry Rich in recognition of his role as Chair of the Audit and Risk Committee and Board member with financial responsibility.
4. **The Board reviewed the remuneration rates at its meeting in December 2018 and agreed that these should remain unchanged for the Board and Independent members. The Board agreed that the Chair’s remuneration continued to remain appropriate.**

Future reviews of remuneration

4. From a governance perspective, the Board acknowledges that it is not considered best practice for a board to set its own remuneration but the Charter requires that here. The Board will continue to review remuneration rates annually.
5. The Board will consider what if any additional arrangements it wishes to put in place for the purposes of any further reviews of remuneration – including the establishment of a remuneration committee – at a later date.

Agreed by the PRP Board, December 2014

Reviewed by the PRP Board, December 2017

Reviewed and updated by the PRP Board, February 2018



Equality, Diversity and Inclusion Policy

Recommendation: General review – no update recommended.

1. The Press Recognition Panel is committed to eliminating discrimination and encouraging diversity amongst everyone who works with us. We believe that, for our organisation to be successful, we need to work with the most talented and diverse people available. The talents and resources of all individuals will be fully utilised to maximise the efficiency of the PRP.
2. In delivering our legal responsibilities including those relating to the recognition of press regulators, and as an employer, our aim is to be truly representative of all sections of society. We want everyone who we work with, to feel respected, and able to give of their best. We want everyone whose views are relevant to our work to feel included.
3. To that end the purpose of this policy is to provide equality and fairness for all in our legal and employment duties, and in the way we conduct our business, and not to discriminate on grounds of any of the protected characteristics of age, disability, gender reassignment, race, religion or belief, ethnicity, sex, sexual orientation, marriage and civil partnership, pregnancy, maternity and political belief. We oppose all forms of unlawful and unfair discrimination.
4. We will enthusiastically give effect to our obligations arising from the public sector Equality Duty (in the light of the fact that the Royal Charter specifies that the PRP's functions are public functions).
5. When public authorities carry out their functions, the Equality Act says they must have **due regard** to the need to:
 - eliminate **unlawful discrimination**
 - **advance equality of opportunity** between people who share a protected characteristic and those who don't
 - foster or **encourage good relations** between people who share a protected characteristic and those who don't.

6. We will ensure we conduct our business in a way which respects all protected characteristics, and that we will engage with all our stakeholders in a way which respects any impacts due to disability or language barrier.

7. Everyone who works for us, whether part-time, full-time or temporary, will be treated fairly and with respect, and will be helped and encouraged to develop their full potential. The talents and resources of all individuals will be fully utilised to maximise the efficiency of the PRP.

8. Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability. In relation to recruitment, appointments will be made solely on merit. We positively encourage applications from people from all sections of the community, from all backgrounds and with a broad range of experience.

9. To ensure that all those who work for us are treated fairly, we monitor diversity as part of our recruitment process and request that individuals applying for roles with us complete a monitoring form. Providing this information is optional. Information provided will be treated as strictly confidential and will be used for monitoring purposes only. No information will be published or used in any way which allows any individuals to be identified.

10. Our commitments are:

- To create an environment in which individual differences and the contributions of everyone are recognised and valued.
- Everyone who works for us and in partnership with us is entitled to a working environment that promotes dignity and respect to all. No form of intimidation, bullying or harassment will be tolerated.
- We will ensure that everyone who works for us is offered training, development and progression opportunities.
- We will consciously think about the three aims of the Equality Duty as part of the process for decision making and the development of policy options, implementation and review across the organisation.
- We will instil equality, diversity and inclusion practices that make sound business sense.
- Breaches of our equality, diversity and inclusion policy will be regarded as misconduct and could lead to disciplinary proceedings or legal action.
- This policy is agreed by the Board which takes full responsibility for Equality, Diversity and Inclusion issues.

11. The policy will be monitored and reviewed annually.

Agreed by the PRP Board, December 2014

Reviewed and updated by the PRP Board, January 2017

Reviewed and updated by the PRP Board, February 2018



Gifts and Hospitality and Expenses Policy

Recommendation: Minor amendment to update details of resources and to clarify the approved HMRC mileage rates.

Gifts and Hospitality

Purpose

1. The purpose of this Policy is to set out the responsibilities of those working for and with the Press Recognition Panel (the PRP) in respect of offering or receiving corporate gifts and/or hospitality.

Deleted: Board Members and staff of

Scope

2. This Policy applies to Board members, Independent members, employees, and to others working with the PRP, including secondees, agency contractors and others employed under a contract of service.

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Deleted: part time

Deleted: on full or short-term contracts,

General Principles

3. The guiding principles governing gifts and hospitality are that:

- The PRP Board , staff and those working with the PRP may not accept any gifts or hospitality that would reasonably be seen to compromise their personal judgment or integrity; and
- Any offers of gifts or hospitality received in respect of work with the PRP should be recorded in the Gifts and Hospitality Register.

Deleted: and

Gifts

4. The Board has determined that there would **never** be circumstances when the acceptance of gifts in any way related to the PRP or its work by either individuals or their relatives would be acceptable. If a gift is offered, it should be politely refused and returned, with an explanation of the PRP's policy. Details of the offer should be provided to the Executive Administration Manager, who will record details in the PRP's Gifts and Hospitality Register.

Hospitality

5. The offering or receipt of hospitality in relation to the PRP or its work may be acceptable provided that it is a normal and appropriate expression of business courtesy. Hospitality may take various forms, from the provision of tea and coffee at meetings, to large formal receptions or dinners. Exceptionally, working lunches etc provided at PRP premises or by the PRP at PRP events where meetings last all day need not be reported or registered. All offers of hospitality should be discussed with the Chair, or the Chief Executive, and recorded by the Executive Administration Manager

Fees for speeches or other work carried out

6. It is the PRP's policy that any decision to speak will be determined on merit – fees will not be accepted. Reasonable expenses connected with a speaking engagement are acceptable. All invitations to speak should be channelled to the Chair via the Chief Executive.

The Gifts and Hospitality Register

7. All offers must be reported as soon as possible to the Executive Administration Manager, who will record details in the PRP's Gifts and Hospitality Register. The PRP may require this information to prove that no tax is payable.

Expenses

Scope

8. This policy applies to all Board **and Independent** Members, advisers, visitors and staff of the Press Recognition Panel (the PRP).

9. This policy is designed to ensure cost efficiency and business effectiveness. In making claims for these expenses claimants must apply a test of reasonableness and use the most cost efficient means of discharging their responsibilities.

Responsibilities

10. Claimants should submit claims as soon as possible. All claimants must ensure expenses are submitted within one calendar month and at the year-end (31 March). Claims after this period will be paid only in exceptional circumstances.

Expenses

11. The PRP does not use the services of an authorised travel agent. All travel and hotel bookings should be made directly by the individual who will be reimbursed in accordance with this policy, unless otherwise advised by the Executive Administration Manager (for example, arrangements might be made for travel and hotel accommodation for overnight stays involving all Board Members).

12. The claimant is expected to take advantage of the best and most cost effective available rates.

Travel and Subsistence Costs

13. It is expected that claimants who live within one and a half hours travelling distance of their official destination will travel daily.

14.1 For travel to attend meetings of the Board or otherwise on the business of the PRP, expenses can be claimed at the following rates:

- i. actual payments for the most cost effective travel by standard class, a flexible return or the cost equivalent public rail transport. Any requests to travel other than standard class should be forwarded with an explanation of the circumstances to be approved by the Chief Executive. The test of reasonableness will apply;

- ii. cost is assumed to apply to travel from the claimant's principal place of residence within the UK. Where this is not the case, the expense claimable would be the lower of the actual cost of travel, and travel from the principal UK residence. Any exceptional circumstance require approval by the Chief Executive
- iii. the same principles applied to rail travel apply also to air travel;
- iv. for travel by private car, **45 pence** per mile for the first 10,000 miles, **25 pence per mile on each additional mile** over 10,000 miles (in accordance with approved HMRC mileage rates), and actual parking fees and congestion charge;
- v. for travel by motorcycle, **24 pence per mile**;
- vi. for travel by bicycle, **20 pence** per mile;
- vii. for travel by underground or bus including where oyster card or contactless payment is used, reimbursement of the published fares (where evidence of the journey is not readily available).

14.2 When absent from home or attending business meetings of the PRP or otherwise on the business of the PRP, expenditure on subsistence will be reimbursed **against receipts** up to the following limits:

- viii. for lunch, up to **£15** per day plus vat;
- ix. for dinner, up to **£25** per day plus vat;
- x. for each night's absence in respect of accommodation up to **£140** per night plus vat. This must not include any extras such as alcohol or newspapers. These must be paid for separately by the claimant;
- xi. any hospitality to third parties must be approved by the Chief Executive and must be in accordance with the PRP's policy on gifts and hospitality (e.g. hospitality for anyone who is not an employee).

Carer costs or other 'reasonable adjustments'

15. Reimbursement of carer costs that enable participants to attend events will be made upon presentation of evidence supporting the claim.

16. Where 'reasonable adjustments' are required to enable a claimant's participation (whether travel, accommodation or otherwise), the cost of making these will be reimbursed.

Airline Frequent Flyer Schemes

17. Claimants may retain frequent flyer scheme benefits. However, participation in these schemes must not influence flight selection. The lowest proposed airfare should be taken. Airline club memberships and credit card reward programmes are at the traveller's expense.

Lost or Missing Receipts / Tickets

18. For audit purposes, receipts and evidence of the expenditure having been incurred are required for all claims (other than for underground or bus travel, where evidence is not readily available). In the event of lost or missing receipts the claimant should seek duplicate receipts or produce alternative proof of payment. If no proof of payment is available, refunds will be allowable only if accompanied by a written explanation and approved by the Chief Executive.

Authorisation

19. All claims submitted must be authorised by the Chief Executive and in respect of expenses incurred by the Chief Executive, by the Chair, or an individual nominated to authorise claims on his behalf.

Notes

20. The Chief Executive will monitor exceptions to the Policy and report them to the Board periodically.

21. Claims for subsistence may not exceed the daily limits shown except with the agreement of the Chief Executive. If there is a request for a regular variation in respect of any part of this policy in relation to any claimant the case will be referred to the Board for a decision, and the policy amended as necessary.

Expenses Policy agreed by the PRP Board, December 2014

Gifts and Hospitality policy agreed by the PRP Board, January 2015

Gifts and hospitality policy revised and updated to include the Expenses Policy by the PRP Board, January 2017

Reviewed and updated by the PRP Board, February 2018



Rules of procedure for meetings of the Press Recognition Panel Board

Recommendation: For general review – no changes recommended.

Introduction

1. The Press Recognition Panel (the PRP) came into being on 3 November 2014 under the provisions of the Royal Charter on self-regulation of the press.

Frequency of Meetings

2. The Board shall meet at least five times in each financial year, and frequently enough to discharge its functions.¹ The Board shall revisit the frequency of the Board meetings regularly. The Board will receive monthly organisational and finance updates from the CEO.

3. An emergency meeting of the Board may be called by the Chair where in their opinion an urgent matter has arisen, or following receipt of a written request, signed by at least two Board Members, setting out the reason why a special meeting is required.

4. The Board may also hold development and strategy events. The purpose of such events will be to provide an opportunity to reflect more thoroughly on strategy and key issues and also to develop its working practices.

Notice of Meetings

5. Board meetings will normally be called well in advance and with a minimum of 28 days' notice. A Board meeting may exceptionally be called at shorter notice. Notice of a Board meeting will be given to Board Members in writing (including by email). Failure to receive notice of a Board meeting will not invalidate that Board meeting or any business transacted at it.

6. By the end of September each year, a schedule of meetings of the Board (and any committees established by the Board) the following calendar year will be proposed for the Board's approval.

¹ From December 2014 to April 2017, the PRP Board met on a monthly basis. The PRP Board moved to bi-monthly meetings post April 2017.

Agenda and papers

7. The agenda and papers for Board meetings will normally be circulated at least five clear working days in advance of the meeting by email and post.

8. The agenda and papers (other than those relating to items to be discussed in the confidential sessions) for Board meetings will be placed on the PRP's website at the same time as being provided to Board Members. In the interests of transparency and in order to enable what would otherwise be confidential items to be discussed in public, the Chair may determine – exceptionally – that papers relating to matters scheduled to be discussed in public session should not be published in advance of meetings.

9. The papers for each meeting shall comprise:

- an agenda approved by the Chair which shall indicate the matters to be discussed at the meeting;
- a copy of the agreed or draft minutes of the last Board meeting;
- the Chief Executive's report;
- the Finance report and
- such other supporting documents and information relevant to the matters to be discussed as the Chair may think appropriate.

10. Non-receipt of papers by individual Board Members will not invalidate a Board meeting or any business transacted at that meeting.

11. Where a meeting of the Board is called at short notice, the Executive shall distribute notice of the meeting and the papers relating to the business to be transacted at the earliest practical opportunity. Papers will be distributed by email.

12. With the permission of the Chair, papers may exceptionally be tabled at a Board meeting or circulated after the agenda is dispatched.

Executive attendance at meetings

13. Members of the Executive (and relevant advisers) will normally attend meetings (or the relevant part of meetings) of the Board to support the consideration of specific items of business. On occasion the Executive may be asked to withdraw from the meeting for specific items of business when the Board will periodically meet for strategic sessions.

Other attendees at meetings

14. Meetings of the Board will be open for public attendance but it will not be permissible for people attending to record or film a meeting or any part of it without the express permission of the Board given in advance.

15. Members of the public who wish to attend will be asked to notify the Board in advance of their wish wherever practicable so that appropriate arrangements can be made to accommodate the meeting.

16. The public may be excluded from that part of a meeting which the Chair, or the Board, decides should be held in confidence given the nature of the subject matter, such as where the discussion relates to the personal affairs of an individual or to matters which would attract legal professional privilege, or, exceptionally, where the Board decides that its evaluation of the issues involved could be prejudiced by being held in public.

17. The Chair may decide to exclude from a meeting any members of the public who disrupt or interfere with the progress of the meeting.

18. The Board may invite other individuals to attend meetings of the Board, for example the Board may wish to hear a particular stakeholder's point of view on a matter. The invitation may be for the entire meeting or for a specific item(s); the invitee is not obliged to attend. Any individual attending a Board meeting in this capacity will not be entitled to vote and may be asked to withdraw from the meeting at any point.

Quorum

19. Any decision made by a properly constituted meeting of the Board satisfying the requirements of these procedure rules shall be deemed to be a decision made by the Board.

20. In order to ensure that there has been proper input to, and scrutiny of, decisions it is necessary to have a quorum for meetings of the Board. The quorum for meetings of the Board shall be 50% of the Board Members (including the Chair) appointed at that time; when calculating this figure any fractions should be rounded down.

21. If a Board Member cannot participate in a discussion and/or voting on any matter as a result of a declaration of interest they will not count in the quorum for that item.

22. If a quorum is not available for the discussion of any matter(s) this will be recorded in the minutes and the decision made will be ratified at the next quorate meeting of the Board.

23. If a Board meeting becomes inquorate during the course of the meeting any decisions made will be ratified at the next quorate meeting of the Board. If those Members present at an inquorate meeting determine that a decision that falls to be taken by that meeting is of such significance that the decision should be taken by a

quorum, that decision may be taken under the deferred decision provision (see below).

24. All or any of the Board Members may, in exceptional cases, participate in a Board meeting by video conference, telephone (or any communication technique that allows all persons participating in the meeting to hear each other) and this fact will be recorded in the minutes accordingly. Board Members participating in this manner will be deemed to be present at the meeting and shall be entitled to make decisions and to vote and be counted in the quorum.

25. Written comments on agenda items submitted by a Board Member who is absent will be circulated to those Board Members that are present and read out at an appropriate point in the meeting. This provision does not apply to Members who are not permitted to participate in a matter as a result of a declared conflict of interest.

Chair

26. The Chair will preside over all Board meetings. In the absence of the Chair, whether this be temporarily on the grounds of a declared conflict of interest or otherwise, a Board Member, chosen from amongst those present, will chair the meeting. It is the responsibility of the Chair or member presiding at the meeting to:

- decide the order in which Board Members will speak, ensuring that adequate views are sought in order to make informed decisions;
- determine all matters of order, competency and relevancy;
- decide which matters are or are not out of order in terms of the meeting;
- determine whether a vote is required and how it is carried out;
- maintain order in the meeting;
- adjourn the meeting, if necessary, for whatever period of time they believe is appropriate.

Declaration of Conflict of Interest

27. All Board Members must comply with the PRP Board's Terms and Conditions of Service regarding declaration of conflicts of interest.

28. Any new interests or changes in interest already registered should be declared as soon as possible and recorded and minuted at the next PRP Board meeting.

29. Before any item is discussed at a Board meeting, each Board Member must disclose any conflict of interest that they believe may arise in relation to that item. If a Board Member is in any doubt as to whether a particular matter constitutes a conflict of interest, they should disclose it.

Order of Business

30. The normal order of business at every meeting of the Board shall be:
- where the Chair is not present and the Chair has not nominated a Board Member to chair the meeting, to select a Member to chair the meeting;
 - to receive any apologies for absence;
 - to consider any declarations of interest;
 - to deal with any matters arising from the minutes of the previous Board meeting in the order in which they appear;
 - to receive a report on any urgent decisions taken between meetings;
 - to consider such business as is set out on the agenda for the meeting;
 - to consider, at the discretion of the Chair, any items of other business.
31. The order of business may be varied by resolution of the Board at the Chair's discretion.

Voting

32. Decisions of the Board will normally be made by consensus rather than by formal vote. Failing consensus, decisions will be made by a vote when:
- the Chair (or in the Chair's absence the Member acting in that capacity) feels that there is a body of opinion amongst Board Members at the meeting that disagrees with a proposal or have expressed reservations about it and no clear consensus has emerged; or
 - a Board Member who is present requests that a vote be taken and this is supported by at least one other Board Member; or
 - the Chair feels that a vote is appropriate.
33. If a vote is taken, the number voting for, against and any abstentions shall be recorded in the minutes. The Chair will cast his/her vote at the same time as the Board. Voting shall normally take place by a show of hands or such other means of assent or dissent as the Chair deems appropriate.
34. In the event of an equality of votes, the Chair shall have a second and casting vote. The decision will be carried by a simple majority. The Chair's ruling as to the outcome of such a vote shall be final.

Deferral of Decision

35. Any Board Member may propose to defer a decision on an agenda item in order that the Board can be provided with additional information to support the taking of that decision, or for any other reason. If this is agreed, the decision to defer, together with the reason for doing so, will be recorded in the minutes of the meeting together with a proposed timescale for returning the matter to the Board for consideration.

36. A deferred decision may be taken through email correspondence outside of the Board meeting, where this is agreed in the meeting.

37. All deferred decisions taken between Board meetings will be reported on and reflected in the minutes of the Board meeting subsequent to the decision being taken.

Urgency

38. During the course of the PRP's business, matters may arise between scheduled Board meetings that require urgent Board approval or discussion and cannot be postponed until the next convened Board meeting. Where decisions that would ordinarily be taken at Board meetings have to be made on an urgent basis they may be taken by the Chair. A decision taken under this provision will be reported at the next Board meeting together with an explanation of the reasons for urgency. The decision will be recorded in the minutes of the Board meeting to which it is reported.

39. If the Chair considers the urgent decision to be of a significant nature, arrangements will be made for the matter to be decided or discussed via email or at an emergency Board meeting.

40. In the case of a decision made by email, in order for a recommendation to be approved, a response must be received from at least 50% of the Board Members appointed at that time. When calculating this figure any fractions should be rounded down. The majority of the responses received must be in favour of the recommendation.

Governance and Records

41. Any point of order alleging a breach of these procedure rules shall be heard immediately. The Chair's ruling on the point of order shall be final.

42. The Executive will be present at all meetings of the Board and any meetings of a committee of the Board to advise and record any decisions made. The Chair will agree any individual to act as Board Secretary.

43. The Board Secretary shall be responsible for ensuring that the minutes of the meeting, including a record of any resolution passed by the Board and any committee, are retained. The Chair (or in the Chair's absence, Board Member acting in this capacity) will be asked to agree the minutes before they are presented to the Board for approval as soon as practicable; once approved the minutes will be signed by the Chair.

44. Once approved by the Board the minutes will be published on the PRP website, subject to the redaction of any discussion of matters considered by the Board to be confidential, although the decisions taken in the confidential session will be published. The presumption will be for the maximum level of openness and transparency.

Reserved Matters

45. Certain matters are reserved to the Board for decision. This does not preclude other matters being referred to the Board for decision.

46. Where it is a matter of judgement as to whether a matter is reserved to the Board or not, the Chair will make a determination and the matters reserved will be amended or clarified accordingly.

Agreed by the PRP Board, December 2014
Reviewed and updated by the PRP Board, March 2017
Reviewed and updated by the PRP Board, February 2018



Statement of Mission and Approach

Recommendation: For general review – no change recommended.

1. 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.
2. We do this by:
 - deciding whether or not a regulator who applies for recognition complies with the criteria set out in the Royal Charter;
 - making sure, through review, that they continue to meet the criteria;
 - withdrawing recognition if they don't; and
 - reporting on any success or failure of the recognition system, including the impact of our work.
3. 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; and
 - **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.
4. We are committed to operating with the maximum degree of openness and transparency in all our dealings. We will also encourage openness and transparency on the part of other relevant organisations.
5. We are committed to ensuring that all those who are affected by our work have a say in how we operate.

6. We are committed to engaging with all stakeholders in a way which respects disabilities and language barriers.
7. When we consult, we will seek out, and listen to, the broadest range of views. We will speak plainly and promote the widest possible dialogue with all those with an interest in our work.
8. When we take decisions, we will always consider how regulation can best respond to the developments in the industry on which it will impact, and the changing reality of people's lives, behaviour and expectations.
9. We will be challenging where challenge is necessary; we will not seek out controversy but we will speak fearlessly.
10. Above all, we will ensure that we play a valuable, and valued, role in delivering a press independent of state regulation, but well-regulated in the public interest.

Agreed by the PRP Board, January 2015
Reviewed and updated by the PRP Board, February 2017
Reviewed by the PRP Board, February 2018



Working in Northern Ireland and Scotland

We are committed to receiving and considering applications from across the United Kingdom including Scotland and Northern Ireland. We seek to engage with all relevant individuals and organisations with an interest in our work from across the UK.

Agreed by the PRP Board, December 2014
Reviewed and updated by the PRP Board, February 17
Reviewed by the PRP Board, February 2018



Policy for fixing the PRP's Common Seal

1. The Royal Charter envisages that the Press Recognition Panel (PRP) will adopt a Common Seal:

14.2 The Recognition Panel shall have a Common Seal. The Recognition Panel may alter its Common Seal or replace it with a new one.

2. Under the provisions of the Charter, the Board determines that a document is duly executed by the Press Recognition Panel by the affixing of its common seal.

3. A document is validly executed by the Press Recognition Panel if it is signed on behalf of the organisation by a minimum of two authorised signatories.

4. Those authorised to give agreement to the fixing of the seal are the Chair, or any member of the Board and the Chief Executive (and in the Chief Executive's absence, any two members of the Board).

5. The seal should be fixed in the presence of a witness who can attest that the relevant authorisations have been granted. This will normally be the Executive Administration Manager.

6. The sealing will be recorded by the Executive Administration Manager in the register of sealings which is held at the PRP's registered office address. This will record the nature of the document being sealed, the names of the authorised signatories, the name of the witness and the date the seal was fixed.

Agreed by the PRP Board, August 2015
Reviewed and updated by the PRP Board, February 2017
Reviewed by the PRP Board, February 2018



Finance Policy

[Recommendation: Technical update to reflect operational limits in place.](#)

1. General

1.1 Established by Royal Charter, the Press Recognition Panel ('the PRP') has been granted funds from the Exchequer that are sufficient to enable the Board to commence its operations and fulfil its purpose for the first three years of operation. The grant of such monies has been made in accordance with the general principles of *Managing Public Money*, which offers guidance on how to handle public funds.

1.2 The Chief Executive is designated as the Accounting Officer for the PRP and is personally responsible and accountable to Parliament for:

- safeguarding the public funds for which she has charge; and
- for ensuring propriety and regularity in the handling of those public funds.

1.3 This document establishes the financial control framework for the PRP. It is set by the Board and is applicable to everyone who works for the PRP, to ensure that the Accounting Officer can undertake her duties in accordance with the law and *Managing Public Money*, in order to achieve probity, accuracy, economy, efficiency and effectiveness. Failure to comply with the Finance policy could result in disciplinary action.

2. Roles, responsibilities and delegation

2.1 The Accounting Officer exercises financial supervision and control by:

- defining specific financial responsibilities;
- agreeing the financial strategy; and
- defining and approving financial procedures and systems.

2.2 The Accounting Officer is personally accountable to Parliament for the stewardship of the PRP's funds, for the good management of the organisation, and for ensuring that the PRP meets its obligation to undertake its role and functions within the financial limits set. The Accounting Officer is responsible for signing off the PRP's annual report and accounts.

2.3 The Accounting Officer will, as she deems appropriate, delegate detailed responsibilities to other staff (in writing) within an approved scheme of delegation.

2.4 The Accounting Officer must ensure that all of the Board and staff are notified of and understand their responsibilities within these financial procedures.

2.5 The Accounting Officer is responsible for:

- implementing the PRP's financial policies and for coordinating any corrective action;
- maintaining an effective system of internal control including ensuring that financial procedures and systems are prepared and documented;
- ensuring that sufficient records are maintained in order to ensure, with reasonable accuracy, the financial position of the PRP at any time;
- maintaining a scheme for charging fees to Regulators in relation to the functions of recognition and cyclical review, which will subsequently be approved by the Board and consulted on publicly (the aim of the scheme is that the PRP will recover its full costs in determining applications for recognition and for conducting cyclical reviews as appropriate para 11.3 of the Royal Charter refers); and
- ensuring the provision of financial advice to the Board.

2.6 The Accounting Officer is responsible for the procurement of goods and services including:

- reviewing the procurement policy;
- ensuring goods and services are procured in accordance with best practice at the best levels of value for money and with due regard to the proportionate value of goods and services that are being procured.

2.7 Staff are responsible for:

- the security of the property of the PRP;
- avoiding loss;
- exercising economy and efficiency in the use of resources;
- conforming with the requirements of this policy, any limitations on delegation of authority to them and financial policies and procedures;
- ensuring that budget allocations are not overspent and that planned and actual expenditure takes full account of the need to achieve value for money in terms of efficiency, effectiveness and economy;
- ensuring that potential significant variations from profiled budgets are drawn to the attention of the Chief Executive so that she, and the Board if appropriate, can consider whether the available resources can be used cost-effectively to further the work of the PRP or to determine what additional action needs to be taken; and
- preventing, reporting and detecting fraud and corruption and ensuring that all PRP colleagues share this responsibility.

3. Financial Systems

3.1 The Accounting Officer is responsible for the maintenance of appropriate financial systems in order to allow the Chair and Board to carry out their financial obligations. The financial systems must be properly described and kept updated.

3.2 The Accounting Officer will ensure maximisation of separation of duties so that individuals are protected from exposure to undue influence, unfair criticism or allegation.

3.3 The Accounting Officer will ensure that suitable back-up arrangements and/or reserve facilities are in place and that when required they can be invoked with sufficient speed to ensure that the operation and integrity of the services are maintained.

4. Business planning, budgets, budgetary control and monitoring

4.1 The Accounting Officer will compile and submit to the Board for consideration, an annual proposed budget to finance the activities in the PRP's work plan.

4.2 The Accounting Officer may delegate the management of a budget to permit the performance of a defined range of activities. This delegation must be in writing and be accompanied by a clear definition of: the amount of the budget; the purpose(s) of each budget, individual responsibilities and the provision of regular reports.

4.3 The Finance Director (or equivalent) will devise and maintain systems of budgetary control and expenditure forecasting.

4.4 Budget holders are responsible for ensuring that expenditure is kept within budget. If budgets are exceeded then the reasons for this should be reported to the Accounting Officer, together with any proposed remedial action.

4.5 In accordance with para 11.9 of the Royal Charter, the Chair has appointed one Board Member to take specific responsibility for reporting to the Board on the management of the finances of the PRP. Harry Rich was appointed to undertake this role at the Board's 18 December 2014 meeting. The Finance Director (or equivalent) will meet the Board Member as required to discuss the PRP's finances in detail. The Accounting Officer will also attend these meetings.

5. Annual accounts

5.1 The financial year for the PRP is the period from 1 April to 31 March each year. The Accounting Officer will prepare annual accounts for each financial year in accordance with the *Financial Reporting Manual* issued by HM Treasury.

5.2 In accordance with Royal Charter, the Board must send a copy of the statement to the Comptroller and Auditor General (C&AG) as soon as practicable after the end of the financial year (para 12.2).

5.3 In accordance with any necessary arrangements made between the Comptroller and Audit General and the Press Recognition Panel, the C&AG will examine, certify and report on the statement each year (para 12.3). The PRP is required to lay a copy of the certified statement and the C&AG's report before Parliament (para 12.4).

6. Banking Arrangements

6.1. The Accounting Officer is responsible for managing the PRP's banking arrangement within the parameters set by the Board.

6.2 The PRP is able to earn any interest on its balances – the PRP's Investment policy provides further advice on the PRP's policy on all investments.

6.3 All payments for invoices, for the salaries and expenses of staff and for the salaries and expenses of the Board will be paid by way of the Banking Automated Clearing Service (BACS). Adequate control mechanisms must be in place with the maximum practicable separation of duties for each payment mechanism.

7. Payroll

7.1 The Accounting Officer is responsible for managing the payroll including making payments on agreed dates.

7.2 The Accounting Officer must be satisfied that proposed payments are supported by appropriate contractual evidence which have been appropriately authorised before confirming payment of the proposed payroll. The Finance Director (or equivalent) will carry out such periodic checks to ensure that on-going payments are correct and due and these should be evidenced.

8. Delegation of authority

8.1 The Accounting Officer will determine the level of financial delegation to budget holders, within the overall scheme of financial delegation approved by the Board (attached at Appendix 1).

8.2 The limits are in respect of individual transactions within the budget and apply to authority to commit expenditure against the budget and to enter into formal contracts (as opposed to being centred on payments). The limits will be reviewed each year and agreed before the start of the year to which they relate. The limits apply to designated roles and therefore any changes to role holders do not require individual re-authorisation.

8.3 The Executive Administration Manager (or equivalent) will maintain an up to date record of authorised signatures and financial authorities on behalf of the Accounting Officer.

9. Procurement

9.1. The PRP is committed to achieving value for money, in terms of quality and price, for all of its procurement activity. In order to achieve this, the PRP will endeavour to clearly communicate its requirements and evaluation criteria, as an informed purchaser, and to establish levels of competition appropriate to the size and complexity of the purchase in accordance with the procurement policy.

10. Payment of invoices

10.1 The Accounting Officer is responsible for ensuring that a system of verification, recording and payment of all amounts payable is in place. The system shall provide for certification that the goods or services invoiced were supplied in the time and manner and to the standard ordered before correct payment is made.

10.2 All properly authorised and approved invoices should be routinely paid within supplier terms or 30 days of receipt unless a longer payment term has been agreed or there is a dispute. The PRP will aspire to pay all properly authorised and approved invoices within 10 working days; the PRP abides by the provisions of the *prompt payment code*.

10.3 Budget holders are responsible for ensuring that invoices received for checking are returned promptly to the Accounting Officer.

10.4 The Accounting Officer will ensure that payments are made to creditors by way of the Banking Automated Clearing Service (BACS). Adequate control mechanisms must be in place with the maximum practicable separation of duties for each payment mechanism.

11. Management and Disposal of Fixed Assets

11.1. The Accounting Officer (or equivalent) is responsible for maintaining an asset register of all capital assets leased or owned by the Panel. In addition, the Finance Director (or equivalent) will ensure that an inventory is maintained of all valuable, attractive and/or portable assets that belong to the PRP.

12. Internal Audit

12.1 The PRP Audit and Risk Committee has determined that an internal audit service is not currently required, and this position is being kept under review.

13. External Audit

13.1 The National Audit Office (NAO) conducts the PRP's annual external audit in accordance with International Standards on Auditing (UK and Ireland) (ISAs (UK and Ireland)), so as to enable the Comptroller and Auditor General to give an opinion on the financial statements.

13.2 Further details of the scope of the audit, as well as the NAO's and PRP's respective responsibilities are set out in the letter of engagement, which is available in the correspondence section of the website.

13.3 The Audit and Risk Committee considers an audit planning report from NAO ahead of the start of the external audit each year. This document explains:

- how the NAO, on behalf of the Comptroller and Auditor General, plans to audit the financial statements, including how the NAO will address significant risks of material misstatement to transaction streams and balances;
- the planned timetable, fees and audit team; and
- matters which NAO are required to communicate to the PRP under the auditing standards, including the scope of the audit, respective responsibilities, and how the NAO maintains independence and objectivity.

14. Regularity, propriety and fraud

14.1. Board Members and staff of the PRP have a responsibility for ensuring compliance with Parliamentary requirements on the control of public expenditure and financial regularity and propriety.

14.2 Regularity is the requirement for all spending to accord with the relevant legislation, the relevant delegated authority, and [the general principles of *Managing Public Money*](#).

14.3 Propriety requires spending to respect Parliament's intentions, conventions and control procedures, including any laid down by the Committee of Public Accounts.

14.4 In dealing with fraud, corruption or other financial irregularity the Chief Executive, as Accounting Officer, is responsible for ensuring that a robust system of internal control is in place within the PRP which includes effective anti-fraud and corruption controls.

14.5 Board Members and staff have responsibility to prevent, report and detect fraud and corruption.

14.6 Anyone who suspects fraud or other financial irregularity must immediately report the matter to the Accounting Officer. In the event that the matter concerns actions by a Board member, the report should be made direct to the Chair of the Board. Concerns about the Chair should be made to the Senior Independent Board member. The PRP has a separate Anti-bribery, money laundering, fraud, theft and corruption policy which should be referred to as appropriate.

Reviewed and updated by the PRP Board, March 2017
Reviewed and updated by the PRP Board, February 2018

APPENDIX 1

Scheme of financial delegation – The CEO is the PRP’s designated Accounting Officer and holds accountability for the PRP’s budget. To support this role, in order to provide adequate scrutiny of financial decisions, the following limits define levels above which financial decisions need to be agreed with the Board.

Limits apply to entering into a contractual obligation for the sums indicated

Authority		Limit	Individual authority
Authority to incur budgeted resource or capital – per transaction	Annual Budget	£25,000	Nil
Authority to incur unbudgeted resource or capital – per transaction	Annual Budget	Above £5,000 subject to ratification by Board	Nil
Payroll limit – monthly	Annual Budget	£100,000	Nil
Transfers between accounts	Annual Budget	£50,000 ^[1]	Nil
Corporate credit card – monthly limit			Chair £11,250 Executive Administration Manager £2,500

Deleted: ,500

^[1] Agreed at the 21 April 2015 Board meeting



Procurement Policy

Recommendation: For general review – no change recommended.

1. The CEO is the PRP's designated Accounting Officer and holds accountability for the PRP's budget. To support this role, the Board has established levels of financial accountability, above which financial decisions need to be agreed with the Board, as set out in the PRP's Finance policy.

2. For items under £2,500 purchasing decisions are at the discretion of the Accounting Officer, who is responsible for ensuring value for money.

2. For items over £2,500 we will seek three written quotes from suppliers based on a clear specification. Our decision will be based on value for money which might include an unbiased consideration of the following factors:

- price;
- ability to deliver the required service quality and timescales;
- warranty and guarantees; and
- experience;
- reputation
- sustainability and ethical considerations

3. The written quotes and final recommendation will be shared with the Board Member with specific responsibility on behalf of the Board for finance matters (for information only), and the paperwork will be retained for the audit trail. Where appropriate, we reserve the right to advertise, and selection criteria will be developed against which to assess bids. In the event that there are compelling documented reasons not to seek three written quotes, we will record this decision in writing.

4. In the very unlikely event that we need to procure a very large project valued in excess of €200,000, we will comply with the requirement to advertise in the Official Journal of the European Union. We will seek legal advice as necessary.

5. We may select a preferred supplier directly where the service required:

- is highly specialist and we cannot identify potential alternative suppliers;
- is highly commercially confidential and we do not wish to release information about our need for the service to the market; and
- extends or relies on knowledge from a relevant previous collaboration with one particular supplier.

6. In these cases, we will take reasonable steps to establish that the supplier's costs are acceptable e.g. by comparing with day rates from other similar businesses where this is practicable and record and retain that information in the form of a file note.

7. We will clearly document the circumstances when extending a previously commissioned service with a supplier to carry out a related but distinct piece of work is preferable to re-procuring (this will generally be in circumstances where the time lapse is for a defined period i.e. not more than 6 months from the end of the previous contract).

8. We will not select a supplier based on the location of a supplier only, or requiring delivery/response within timescales that would restrict the supplier market. Geography may end up being a factor, but it will never be a pre-requisite. We will decide and record what criteria are important to us, to allow us to decide which supplier offers the best value for money.

9. We will not inadvertently discriminate against small suppliers, or those based outside London, by proactively looking at smaller suppliers and suppliers based outside of London to ensure the widest range of suppliers.

10. The final purchasing decision rests with Chief Executive and/or Board (depending on the level of spend)¹.

¹. The Chief Executive Officer's limit is £25,000 for budgeted spend and £5,000 for unbudgeted spend. Unless specific authorisations have been agreed by the Board, levels above this need sign off by the Board.

Approved by the PRP Board, September 2015
Reviewed and updated by the PRP Board, March 2017
Reviewed and updated by the PRP Board, February 2018



Scheme of Delegation and Matters reserved

Recommendation: Minor technical amendments.

Principles overall

1. The following principles in relation to delegation are to be applied:
 - The Board may delegate any of its functions (other than those which the Royal Charter itself requires the whole Board to take) to the Chair, an individual Board Member, a committee or to a member of the executive. Any such delegation will be recorded as a formal resolution of the Board. Regardless of any delegation, the Board remains ultimately accountable for and must take corporate responsibility for action taken.
 - The Board delegates to the Chief Executive Officer, the discharge of all statutory or general legal obligations (such as those arising as an employer or in relation to the Data Protection Act 2018) other than any matter reserved to the Board; and any matter delegated to a committee of the Board. Detail of the delegation of functions are set out in the scheme of delegation.
 - The Chief Executive Officer, in consultation with the Chair, may delegate the discharge of some of the functions to one or more members of staff. The Chief Executive Officer will keep a list of such delegations.
 - The Board may make delegations or vary, revoke or add to existing delegations. Any delegation made by the Board may be limited or made subject to any conditions, for example, the Board may delegate a function only for a limited period of time or for a particular matter.
 - The Board delegates to its committee(s) the discharge of those functions that fall within their respective terms of reference other than any matter reserved to the Board.
 - Unless the Board imposes a condition to the contrary, a committee of the Board may delegate the discharge of a function to a sub-committee or a named Board Member or executive, subject to any conditions imposed by that committee.
 - The Board authorises the Chair or any named executive to sign contracts or other documents on behalf of the PRP.
 - The CEO has accountability for the PRP's budget as Accounting Officer. The Board supports the Accounting Officer in this role by overseeing expenditure decisions above £25,000 of budgeted spend and £5,000 of unbudgeted spend.
 - The Board may discharge a function itself even though it has delegated the discharge of that function.

Deleted: 1998

Matters reserved to the Board

2. The Royal Charter provides that the Board shall not delegate the following decisions (paragraph 6.2):

- a decision to recognise or withdraw recognition from a Regulator in accordance with the Scheme of Recognition; and
- a decision to undertake an ad hoc review in accordance with the Scheme of Recognition. Otherwise, the Charter (paragraph 6.1) gives the Board the power to determine and regulate its own procedures.

3. In accordance with these powers, the following matters are reserved to the Board for decision:

(1) Royal Charter

- A decision to recognise or withdraw recognition from a Regulator in accordance with the Scheme of Recognition.
- A decision to undertake an ad hoc review in accordance with the Scheme of Recognition.
- A proposed amendment to the Royal Charter (which must be ratified by a resolution that has been passed unanimously by all Members of the Board).
- The Scheme for charging fees to Regulators.
- Approving reports relating to any success or failure of the recognition system.
- Approving the annual report and financial statements about the activities of the PRP – including whether it has granted recognition to, or withdrawn it from a Regulator – prior to the laying of the report before Parliament and the Scottish Parliament.
- Approving use of the Common Seal, including altering the Common Seal and replacing it with a new one.
- Surrendering of the Royal Charter, and subsequently winding up and otherwise dealing with the affairs of the PRP in a manner which the Board considers fit.

Deleted: Recognition Panel

Deleted: Panel

(2) Organisational Issues

- Approval of the PRP's strategy and forward programme of work.
- Approval of the PRP's communications strategy.
- Approval of the PRP's Equality, Diversity and Inclusion Policy.
- Approval of the annual budget and any material changes to it.
- Approval of the annual accounts.
- Decisions to commence or defend significant litigation.
- Approval of major items of PRP policy that raise new issues of principle.
- Approval of the publication of any PRP public consultation paper and major decisions following that consultation.
- Approval of the PRP's response to any significant external consultation of strategic importance to the Panel.
- Approval of any delegation in accordance with the PRP's governance framework and the variation or rescinding of any such delegation.

(3) Management Issues

- Determining the remuneration strategy.
- Approval and strategic monitoring of health and safety policies.
- Oversight of the capability/capacity of the PRP to meet its statutory objectives.
- General oversight of the discharge by the executive of PRP's business.
- Contractual and Other Obligations with Third Parties.
- Approval of contracts in the ordinary course of business above £25,000.
- Approval of any memorandum of understanding or formal agreements of strategic importance that the PRP may enter into with a third party.

(4) Financial Reporting and controls

- Review performance against the PRP's strategy, objectives and budget and ensuring any corrective action is taken.

(5) Board Membership and other appointments

- Appointment or removal of Board members. Appointment to or removal from committees including identification of the chair and the payment of such remuneration and allowances to any person who is a member of a Board committee but who is not a Board member.

(6) Delegation of Authority

- Approval of terms of reference of Board committees.

(7) Governance

- The undertaking of regular reviews of the performance of the Board and Board committees.
- Approval and review of the governance framework other than technical changes which may be signed off by the Chair.
- Approval and review of this schedule of matters reserved for Board decision.

(8) Legal

- Anything that is by law reserved to the Board.

Agreed by the PRP Board, December 2014
Reviewed and updated by the PRP Board, March 2017
Reviewed by the PRP Board, February 2018

Investment Policy

Recommendation: For general review – no change recommended.

Scope

1. This policy applies to the investment of all funds of the Press Recognition Panel (the PRP).
2. The PRP is required to maintain a minimum accessible cash reserve in order to provide a cushion against the impact of unforeseen payments. All remaining balances arising from the management of cash flow will be invested in approved investment institutions to maximise investment earnings. The institutions must be subject to the Financial Conduct Authority (FCA) regulations.
3. The investments will be managed by the Accounting Officer (or equivalent), or another officer appointed by the PRP to act as Investment Officer, who will strive to invest with the judgement and care that prudent individuals would exercise in the execution of their own affairs, to maintain the safety of principal, maintain liquidity to meet cash flow needs and to provide competitive investment returns for the PRP.
4. From time to time investments may be managed through external professionals. These must be managed in a manner consistent with this policy.

Security

5. The security of the principal is the foremost objective of all investments. Investments will be managed in a manner that seeks to ensure the security of capital.

Credit Risk

6. The PRP will minimise credit risk and the risk of loss due to the failure of the financial institution by dealing only with financial institutions, brokers/dealers, intermediaries, and advisors who are regulated by the Financial Conduct Authority.

Interest Rate Risk

7. The PRP will minimise the risk of interest bearing investment redemption penalties by planning the maturity of deposits so that they meet the cash flow requirements for day to day operations avoiding the need to cash in prior to maturity.

Currency Risk

8. The PRP will eliminate the risk of loss by investing in the United Kingdom in sterling.

Liquidity

9. The liquidity of investments will be organised to meet all operating requirements that may reasonably be anticipated. This will be accomplished by

structuring the portfolio so that deposit maturity is linked to the cash needed to meet anticipated demands.

Standards of care

Prudence

10. The Board has authority to select any second bank, and the Chief Executive Officer has authority to manage any transactions between the savings and deposit accounts. Investments will be made with judgement and care for investment and not for speculation and reflect the security of capital as well as the income expected. The PRP recognises that no investment is totally free from risk.

11. Any person delegated responsibility by the PRP who acts in accordance with written procedures and this investment policy will be relieved of personal liability for the performance of these investments.

Ethics and conflicts of Interest

12. Individuals involved in the investment process must avoid any activity that might conflict with the proper execution and management of the investments, or that could impair their ability to make impartial decisions. Employees and investment officials must disclose any material interests in financial institutions with which they conduct business.

Delegation of Authority

13. Authority to manage the investments is delegated to the Chief Executive Officer or another officer specifically appointed by the PRP who will act in accordance with this investment policy. No person may engage in an investment transaction except as provided under the terms of this policy. The Chief Executive Officer will be responsible for establishing controls to regulate the activities of other officials to whom this function is delegated by the Board.

Checks and balances

14. The following guidelines have been established to enhance the integrity and transparency of the Panel's internal procedures for investing the Board's funds and for accounting for those investments.

15. Any designated officer acting as Investment Officer(s) will be authorised, under the Scheme of Delegation for Financial Management, to transact investment business on behalf of the Board.

16. All investment confirmations will be sent directly to the Chief Executive Officer where transaction details will be compared and verified against internal records. The Finance Director (or equivalent) will review all investment transactions subsequent to execution. All journal entries relating to investments will be countersigned by the Chief Executive Officer, on the basis that she has not been involved in conducting the transaction.

Investment transactions

Internal Controls

17. The Accounting Officer is responsible for establishing and maintaining an internal control structure that will be reviewed annually with the Panel's external auditors. The internal control structure will be designed to ensure that the assets of the Board are protected from loss, theft or misuse and to provide reasonable assurance that these objectives are met. The concept of reasonable assurance recognises that the cost of control should not exceed the benefits.

Eligible Investment

18. The following list represents the current range of investments which are authorised for the investment of funds.

18.1 Deposits – The Board may invest funds regulated by the FCA to meet short-term liquidity needs in instant access saving accounts and in term deposits. The maturity of these will vary to coincide with expected cash demands.

18.2 Bonds – The Board may only invest in Bonds which are issued by the UK government and purchased on the Stock Exchange or directly from the Treasury. Bonds may also be purchased through authorised dealers and banks.

18.3 Shares or other securities – The Board will not invest in either public or private equity or other securities.

Investment Restrictions and Prohibited Transactions

19. The investment of the PRP's funds will be subject to the following restrictions:

- Borrowing for investment purposes is prohibited.
- Investing in shares or other securities is prohibited.
- Investment in any instrument, which is commonly considered a "derivative" investment (e.g. options, futures, swaps, caps, floors, and collars), is prohibited.

Performance Review and Reporting

20. The Chief Executive Officer will prepare an investment report for Board Member with responsibility on behalf of the Board for financial matters that will provide an analysis of current investments and transactions over the reporting period where appropriate. The report will include a listing of individual investments held at the end of the reporting period. The report will be presented to the full Board annually.

Record Keeping and Safekeeping

21. The Chief Executive Officer will be responsible for ensuring all investment transactions are recorded and for securing all documents relative to such transactions.

Policy Considerations

22. The Chief Executive Officer will review the Investment policy periodically and recommend all necessary changes to the Board Member with responsibility on behalf of the Board for financial matters, and for onward approval by the full Board.

Reviewed and updated by the PRP Board, March 2017
Reviewed and updated by the PRP Board, February 2018



Disciplinary procedures for Chair and Board Members

Recommendation: Updated to reflect operational practice.

Introduction and scope

1. The Royal Charter provides (para 6.2) that:
'If the Board is satisfied (which shall require a majority of two thirds of the Members entitled to vote to concur), that a Member is unwilling, unable or unfit to discharge the functions of a Member of the Board under this Charter, that Member shall be duly dismissed and notified in writing of this fact, together with reasons. The Member concerned shall not be entitled to vote on this matter and the Board may make further provision as to the operation of this paragraph under Article 6 of the Charter.'
2. This procedure has been prepared to give effect to the provision above and has been approved (and will be periodically reviewed) by the Board.
3. This disciplinary procedure is also to be used in the event of an allegation of personal misconduct or impropriety or a suspected breach of duty by the Chair or any other of the Board.
4. In accordance with paragraph 6.1 of the Royal Charter, any Member of the Board may resign by giving notice in writing to the PRP.

Legal representation

5. At any stage of an investigation into allegations made against a Member, the Member is entitled to legal representation. The Member will be reminded of this entitlement to advice at each relevant stage of the procedure. If the Member chooses to be legally represented, he/she must inform the Chair in writing of the name and address of the legal representative.
6. Legal representation will be at the Member's expense. However, depending on the outcome of the investigation, some or all of such costs may be reimbursed at the discretion of the Board.

Procedure for investigating alleged breaches of duty in relation to Members other than the Chair

Preliminary consideration

7. If the Chair becomes aware of issues relevant to this policy relating to a Member, the Chair must:

- i. inform the Member in writing of the details of the issue and invite him/her to submit written comments within 14 days, or such other period as may be specified; and
- ii. notify the full Board that he has done so.

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- 8. Following consideration of the Member's written comments, if the Chair is satisfied, on the basis of all the information available to him, that any concerns raised are manifestly unfounded, no further action will be taken. The Chair must inform the Member, the full Board and any person who made a relevant allegation of his/her decision.

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- 9. If the Chair is satisfied, on the basis of all the information available to him/her, that the issue raised is not manifestly unfounded, he must immediately write to the Member concerned:
 - stating that the issue will be investigated;
 - enclosing a copy of these procedures;
 - setting a date for the individual to meet the Chair (preferably within 14 days from receipt of the letter); and
 - informing the individual of his/her entitlement to be accompanied or legally represented at the meeting and at any subsequent stages of the investigation.

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Meeting with the Chair

- 10. The Chair will meet the Member concerned to discuss the alleged issue and the Chair will then decide the appropriate course of action to be taken. The Member may be accompanied or legally represented at the meeting by a person of his choosing.

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- 11. After the meeting, the Chair, having regard to all relevant factors, including the outcome of any further investigation he may consider necessary, will submit a report to the full Board in which he may recommend that the Board should take one or more of the following courses of action:
 - dismiss any allegation and/or end the consideration of the issue;
 - direct further investigation of any allegation/issue;
 - suspend the individual's appointment to the Board pending further investigation;
 - terminate the individual's appointment to the Board; and
 - direct such other action as the Chair considers necessary.

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- 12. On the basis of the report prepared by the Chair, the full Board will determine the matter. In accordance with the Royal Charter, the Board's decision shall require a majority of two thirds of the Members entitled to vote to concur. The Member concerned shall not be entitled to vote on this matter.

- 13. If the Board suspends the Member's appointment, it may direct whether such suspension is to be with or without remuneration.

- 14. If the Member's appointment is terminated, the Member will be notified without delay and in writing, together with reasons for the Board's decision.

Further investigation

15. If the Board directs further investigation, it may appoint an Investigating Officer. The Investigating Officer may be an official of the PRP or any other person at the Board's discretion.
16. Subject to any whistleblowing arrangements the PRP has in place, the Investigating Officer may seek any further evidence and interview any person, as he/she considers necessary.
17. The Investigating Officer must report his/her findings of fact to the Member concerned and invite his/her comments within 14 days, or such other period as may be specified. At the conclusion of the investigation, the Investigating Officer will report his/her findings together with the Member's comments, if any, to the Board. The Investigating Officer may also make recommendations to the Board.

Notification of decision

18. After consideration of the Investigating Officer's report and any recommendations and of any comments made by the Member, the Board will determine the matter. The Board's decision shall require a majority of two thirds of the Members entitled to vote to concur. The Member concerned shall not be entitled to vote on this matter.
19. If the Member's appointment is terminated, the Member will be notified without delay and in writing of this fact, together with reasons for the Board's decision.
20. At the conclusion of the investigation, the Board may publicly announce its final decision. Any such announcement would normally be brought to the attention of the Commissioner for Public Appointments.

Procedure for investigating complaints made about Members in their professional capacity

21. If a complaint in relation to the conduct of a Board Member in a professional or personal capacity is made to or by a professional body or prosecuting authority, they should notify the Chair without delay and the matter will be declared at the next Board meeting.
22. If the Chair considers that the issue is one that potentially falls within the scope of this policy, he will act in accordance with the requirements of this policy.

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Investigations relating to the Chair

23. Any allegation or concern relevant to this policy and relating to the Chair should be made to the Senior Independent Board Member, The Senior Independent Board Member will inform the Chair of the issue as soon as possible.

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24. Any investigation relating to the Chair will be carried out by the Senior Independent Board Member, on the Board's behalf.
25. The procedures set out in this document will apply, save that references to the Chair in the conduct of the investigation will be substituted by 'the Board' (or any person the Board directs).

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Agreed by the PRP Board, December 2014
Reviewed and updated by the PRP Board, March 2017
Reviewed and updated by the PRP Board, February 2018



Complaints handling policy (about an individual at the Press Recognition Panel)

Recommendation: For general review – no change recommended.

Scope

1. This policy sets out the process to follow if you are not satisfied with the service you have been given by an individual at the Press Recognition Panel (PRP). Please note that if you have a complaint about the press, you will need to refer it to the relevant press regulator. If your complaint relates to whether or not a press regulator should be recognised by the PRP, or any other matter relating to decisions taken by the Board, please email the PRP at contact@pressrecognitionpanel.org.uk.

Stage 1

2. In the first instance, please contact the person that you have dealt with and discuss your concerns directly with them. They will often be in the best position to understand your situation and give you an explanation as to what has happened.

Stage 2

3. If you are not satisfied with the response you receive, then you can write to our Chief Executive Officer, who will call for a full report to see whether you have received fair treatment. Please contact the Chief Executive Officer via the Executive Administration Manager: sansari@pressrecognitionpanel.org.uk.

Stage 3

4. If you remain dissatisfied, or your complaint is about the Chief Executive Officer, you may refer your complaint to the Chair of the Press Recognition Panel, who will review the report prepared for the Chief Executive Officer and the decisions taken so far. Please contact the Chair via the Executive Administration Manager.

5. If your complaint is about the Chair, you may refer your complaint to the PRP's Senior Independent Board Member. Please contact the Senior Independent Board Member via the Executive Administration Manager.

Timeframe

6. You should try to make your complaint as quickly as possible. If you are complaining more than 3 months after an incident you should explain why your complaint has been delayed. We will always consider complaints brought within this period but will only consider those outside if good reasons are given for the delay. If you wish to take your complaint to either Stage 2 or Stage 3, however, we will expect you to do so within one month of the original decision.

7. We will treat your complaint in confidence and will investigate it carefully as quickly as possible. Every effort will be made to send a full and clear reply within 10 working days of your complaint being received. If we cannot investigate your complaint fully within that time, we will let you know and keep you informed of progress.

Agreed by the PRP Board, January 2015
Reviewed and updated by the PRP Board, March 2017
Reviewed and updated by the PRP Board, February 2018



Whistleblowing Policy (for Board and staff)

Recommendation: For general review – no change recommended.

Making a Disclosure in the Public Interest

Introduction

1. The Press Recognition Panel ('the PRP') is committed to the highest standards of openness, probity and accountability. An important aspect of accountability and transparency is a mechanism to enable the Board and staff (defined as employees and all those working with and for the PRP) to voice concerns in a responsible and effective manner.

2. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. However, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management.

Scope

3. The Public Interest Disclosure Act 1998, gives legal protection to employees who reasonably believe that they are acting in the public interest and where the disclosure falls into one or more the following categories:

- a criminal offence
- the breach of a legal obligation
- a miscarriage of justice
- a danger to the health and safety of any individual
- damage to the environment
- deliberate concealment of information tending to show any of the above five matters

4. It should be emphasised that this policy is intended to assist individuals who reasonably believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the PRP, nor should it be used to reconsider any matters which have already been addressed under other procedures.

5. It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case, malicious or wild allegations could give rise to legal action on the part of the persons complained about.

Confidentiality

6. It is possible for you to raise your claim anonymously if you wish to do so. However, this may mean that it is difficult to investigate fully if you haven't provided us with enough information.

7. The PRP will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

How to raise a concern internally

8. You should raise any matter of concern, serious or otherwise with the Chief Executive Officer (CEO), Chair of the PRP Board or the Independent Member of the Audit and Risk Committee. If the matter concerns the Chair, you should speak to the Senior Independent Board Member.

9. When raising your concern, it is helpful for you to provide an explanation with as much detail as possible including dates and times of incidents, any eye witness details and any supporting documents that you have.

How to raise a concern externally

10. Where attempts to raise matters internally have been unsuccessful or exceptionally, you feel you cannot raise the concerns internally, you may consider raising the matter externally. If an individual decides to blow the whistle to a 'prescribed person' rather than their employer, they must make sure that they have chosen the correct person or body for the issue. The Department for Business, Energy & Industrial Strategy has published a list of the prescribed persons and bodies who an individual can make a disclosure to. There is also a brief description about the matters that can be reported to each prescribed person:

<https://www.gov.uk/government/publications/blowing-the-whistle-list-of-prescribed-people-and-bodies--2>

What happens next

11. The person who you raise the concern to will listen and consider your concern in full and determine whether any action is needed. This may include reporting it to the Audit and Risk Committee.

12. We will try to keep you informed, in writing, about the action that we are taking in relation to the concern including how we propose to deal with the matter, whether we need further assistance from you, any action that is taken and the outcome of the investigation. However, we may not be able to provide you with much detail where we have a duty to keep the confidence of other people.



Freedom of Information policy

Recommendation: [Minor technical updates.](#)

Background

1. The PRP is not listed within the schedule to the Freedom of Information Act 2000 ('the Act') and so is not a body to which its provisions apply. The Board nevertheless operates as if the provisions of the Act apply to it, including producing and operating a publication scheme and considering and responding to information requests.
2. The PRP's publication scheme sets out the information that we will routinely make available to the public, and where and when that information will be available.
3. If the information you seek is not available under our publication scheme, then you can make a request for the information in accordance with the Act. This provides that, subject to certain defined exceptions, any person making a request for information from us is entitled:
 - o to be informed in writing whether or not we hold information of the description specified in the request; and
 - o if we do, to have that information communicated to them.
4. Our intention is to publish a disclosure log containing details of responses to information requests received by the PRP where that information is not routinely published or covered in the publication scheme.
5. If your request relates to personal information about you, please refer to the PRP's Data Protection policy.

Making a request for information

6. If you want to make a request for information from the PRP, then you should write to us providing:
 - o your name;
 - o your return address; and
 - o a detailed description of the information that you are requesting.
7. You can submit your request to the PRP's Executive Administration Manager at: sansari@pressrecognitionpanel.org.uk or:

Saima Ansari
Executive Administration Manager

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

Please direct any request for assistance in completing your request for information to sansari@pressrecognitionpanel.org.uk.

Processing a request

8. Upon receipt of a request, the PRP will:

- check the request is valid – if further clarification is needed to assist in identifying the exact information required, this will be dealt with immediately upon request;
- enter the request on the PRP's FOI request log;
- send an acknowledgement letter to the applicant;
- generally respond to the request within 20 days (there may be circumstances when we need longer to respond – details are set out below).

Timescales

9. We will aim to respond to your request for information promptly, and generally within 20 working days from the day after the date on which your request was received.

10. Extra time may be taken to respond to a request for information where, for example:

- a fee is deemed payable, in which case the response period will be put on hold until the fee is received;
- the request for information is being considered under a disclosure exemption akin to the Act's public interest test, in which case the response period may be extended by a reasonable period. We will tell you within the response period which exemption we believe applies and we will give you an estimate of the date by which we expect to reach a decision regarding the application of this exemption.

Refusing a request

11. A requester may ask for any information that is held by the PRP. However, in some cases, there will be a good reason why we will not make public some or all of the information requested. We would normally refuse a request under the following circumstances:

- it would cost too much or take too much staff time to deal with the request;
- the request is vexatious;
- the request repeats a previous request from the same person;
- the request relates to personal data and releasing it would be contrary to the Data Protection Act [2018](#).

12. While the PRP is not subject to the Act, we have chosen to apply the framework of exemptions set out in the Act to all information requests. The PRP will not classify information as exempt from disclosure unless there are very clear

arguments for doing so. Some exemptions relate to particular types of information, for instance, information relating to the development of policy. Other exemptions are based on the harm that would arise or would be likely arise from disclosure, for example, if disclosure would be likely to prejudice a criminal investigation or prejudice someone's commercial interests.

13. Below is a list of exemptions that are most likely to be relevant to the information the PRP holds:

1. Information accessible by other means (FOI Act section 21 exemption)
2. Personal information (FOI Act section 40 exemption)
3. Information provided in confidence (FOI Act section 41 exemption)
4. Information intended for future publication (FOI Act section 22 exemption)
5. Investigations and proceedings conducted by a public authority (FOI Act section 30 exemption)
6. Prejudice to the effective conduct of public affairs (FOI Act section 36 exemption)
7. Legal professional privilege (FOI Act section 42 exemption)
8. Commercial interests (FOI Act section 43 exemption)

14. Exemptions 1 to 3 above are absolute, and we will not apply a test akin to the Act 'public interest test'. However, the majority of the Act exemptions require public bodies to conduct a 'public interest test' meaning that the public interest arguments will be considered before deciding whether or not to disclose information. The PRP will adopt a similar approach in assessing requests for information, which might mean the PRP disclosing information in spite of an exemption, where it is in the public interest to do so.

15. Where the PRP refuses all or any part of a request, we will send the requester a written refusal notice. We will issue a refusal notice if we are either refusing to say whether or not the information is held at all or confirming that information is held but refusing to release it.

Consultation with third parties and transferring requests

16. We may need to consult third parties in order to reach a decision about whether or not the requested information can be released.

17. If you wish to be notified before we consult a third party about your request for information, you should state this in your application.

18. If you have made a request for information that we believe is held by another public authority, it may be appropriate for you to submit a new request directly to that public authority. Alternatively, we may transfer your request to that public authority. Where we decide that it is appropriate to transfer your request to another public authority, we will first check that it holds the information that you have requested.

19. If you wish to be notified before we transfer your request for information to another public authority, you should state this in your application.

Fees

20. Although the PRP is a wholly independent body, its funding is via Exchequer grant and fees. We will charge a fee for complying with a request for information in accordance with the Freedom of Information and Data Protection (Appropriate Limit and Fees) Regulations 2004.

21. If the cost of locating, retrieving and extracting the information is £450 or less, we may charge only for disbursements including photocopying, printing and postage costs, if at all. If the cost is more than £450, we may choose not to comply with your request. However, we will consider whether it is possible to provide any information within the cost ceiling of £450. We will also consider whether it is reasonable to answer your request and charge an appropriate fee.

22. You will be notified in advance about any fee that you must pay to the PRP.

Complaints procedure

23. If you are dissatisfied with the response to your request for information (including any decision to charge a fee), you are invited to discuss the response directly with the Executive Administration Manager, Saima Ansari using the contact details above.

24. However, if this informal discussion does not resolve your complaint, then you should submit your complaint in writing to the PRP's Chief Executive Officer:

suppal@pressrecognitionpanel.org.uk or:

Susie Uppal
Chief Executive Officer
Press Recognition Panel
Mappin House
4 Winsley Street
London W1W 8HF

25. The Chief Executive Officer will consider your complaint, and will confirm, reverse or amend the decision. You will be advised in writing of the outcome of your complaint.

26. If you are dissatisfied with the Chief Executive Officer's decision, then you should direct your complaint to the Chair of the Board, David Wolfe QC:

David Wolfe QC
Chair
Press Recognition Panel
Mappin House
4 Winsley Street
London
W1W 8HF

27. As the PRP is not subject to the Act, there is no right of complaint to the Information Commissioner.

Further information

28. The Information Commissioner is responsible for promoting good practice and ensuring compliance with the Act. While the Information Commissioner does not have jurisdiction in relation to the PRP because we are not a body to which the FOI provisions apply, the Information Commissioner's Office is nevertheless the leading source of guidance about the Act:

The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

T: [0303 1231113](tel:03031231113), or 01625 [524510](tel:01625524510),
W: <https://ico.org.uk>

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Agreed by the PRP Board, December 2015
Reviewed and updated by the PRP Board, March 2017
Reviewed and updated by the PRP Board, February 2018



Information Technology policy

[Recommendation: Minor technical updates.](#)

Introduction

1. This policy applies to everyone (including Board Members, [Independent members](#), staff and contractors) using the Press Recognition Panel's ("PRP's") Information Technology (IT) equipment and systems and describes the rules and conduct that the PRP requires you to observe. By IT equipment and systems, we mean telephones, computers connected to the network (including the use of emails and the internet) and any other equipment owned or operated by the PRP that may be used to communicate, store or process information electronically; also all emails and electronic documents sent using a pressrecognitionpanel.org.uk email address or any sent in the course of activities for the PRP using any other email address.
2. The purpose of this policy is not to prevent, discourage or monitor reasonable usage of IT systems, but rather to set out clearly a code based on mutual trust and an underlying assumption that everyone will use the IT systems fairly and reasonably. Note: monitoring of usage, whether such usage occurred prior to the introduction of this policy or after its introduction, will not be carried out in the normal course of events: see Annex 1.
3. The intention is not to impose restrictions that are contrary to the PRP's established culture of openness, trust and integrity. The PRP is committed to protecting its Board Members, employees, consultants and itself from illegal or damaging actions by individuals, either knowingly or unknowingly and this policy is constructed as part of that commitment.
4. This document outlines the PRP's security policy in relation to the use of IT equipment and systems. The policy has been created after reviewing best practice use and the relevant legislation currently in force and it is designed to ensure that we meet all legal requirements, minimise our exposure to risk, protect our information and utilise the equipment in the most effective manner. Inappropriate use exposes the PRP to risks including virus attacks, compromise of network systems and services and a range of legal issues.
5. It is vital that everyone at the PRP applies this security policy in full. While the policy does not form part of anyone's contract of employment, all users of IT systems are responsible for ensuring that they are complying with the policy and with any current legislation. Failure to comply with this policy and other guidelines could result in disciplinary action that may lead to dismissal (including termination without notice in cases of serious breaches) and the possibility of prosecution under existing legislation.

Operating principles

6. The PRP will conform with the relevant legislation in force at the time governing the use and monitoring of e-mails and the internet, which principally involves: the Human Rights Act 1998, the Data Protection Act ~~2018~~, the Regulation of Investigatory Powers Act 2000 and the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000 (S.I. 2000, No. 2699). The PRP has also decided that, whether or not the Freedom of Information Act is extended to cover the PRP's activities, the PRP will behave as if the Act applied to it (including therefore in relation to communications sent using IT systems). All reasonable steps will be taken to inform users about their legal rights under the legislation at the time through the communication of this policy.

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7. Other legislation taken into account in this policy includes the Copyright, Design and Patents Act 1988 and Data Protection Act ~~2018~~.

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Your use of the PRP's IT

8. The principal purpose of the IT systems is to facilitate the legitimate business purposes of the Press Recognition Panel. However, it is acknowledged that everyone is entitled to means of personal communications during the working day, particularly, but not only, where there is a need to communicate urgently. Personal use of the PRP's IT equipment, as described later in this policy, is allowed, so long as carried out reasonably and appropriately.

9. Under no circumstances should the IT systems be used to send, receive, browse, download or store material that may be illegal, offensive or cause embarrassment to others. This includes (without limitation) the use of the PRP's IT systems to send, receive, obtain access to, download or store pornographic material and material that is religiously, racially or sexually offensive.

10. In particular, you may not use the PRP's IT systems to send, or solicit, communication where the content (or any attachment) is pornographic, sexist, racist, homophobic or in any other way unlawfully discriminatory.

11. It is important to ensure that you and the PRP are protected against the misuse of others' copyright material and that the integrity and effectiveness of the IT systems is maintained. Accordingly, you may not install or update any software not provided or approved by the PRP without the prior permission of the Chief Executive Officer. This does not apply to updates of approved software already installed.

12. You are responsible for the security of the IT systems assigned to you, and you must not allow them to be used by any other person unless, in the case of staff members, permitted by your manager.

13. Your system password is unique to you and must not be made available to any other person, (other than our IT consultants who may need your password for support purposes).

14. Passwords should be sufficiently memorable so that you can avoid writing them down, but not obvious or easily guessed. The password should be at least 9 characters long and contain three of the four types of keyboard character (upper

case, lower case, numbers and symbols – by way of example only – 2014.St0Ne%. It is sensible not to use the same password for all devices.

15. To ensure compliance with this policy, use of IT systems by staff may be monitored. Such monitoring will not be carried out in the normal course of events and when monitoring does occur it will be in accordance with the practice set out in Annex 1. You should also be aware that others may have access to systems you use, the data stored or may oversee what you are doing.

16. Staff accept that by using the PRP's IT systems to send or receive e-mails, or to access the internet, that monitoring may take place in accordance with the practice set out in Annex 1. Accordingly, it is recommended that any communications carried out by e-mail for communication which are in their nature private or confidential or which may contain sensitive personal data, should be clearly marked "private" in the subject line.

17. E-mail monitoring will be confined to the address/heading of an e-mail unless there appears (in the view of the Chief Executive Officer) to be a valid and defined reason to examine the content.

18. In exercising its right to monitor e-mails and internet usage, the PRP will comply with its obligations under the Data Protection Act 2018 and the Regulatory of Investigatory Powers Act 2000. The PRP will also comply with the Information Commissioner's Employment Practices Code in this regard.

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Personal use of the PRP's IT Systems

19. Use of the PRP's IT systems by you to send and receive personal e-mail, to use the internet (including instant messaging services) or to make or receive personal telephone calls is acceptable provided that your usage:

- is kept to a minimum;
- does not interfere with your work;
- does not incur anything more than trivial costs to the PRP; and
- complies with all other PRP policies.

20. If using social media sites, such as Twitter, it should be clearly stated that any views expressed are those of the individual, rather than of the PRP.

21. This policy on personal use is dependent upon it not being abused or overused and may be withdrawn or amended at any time and without notice.

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PRP computers

22. All PRP laptops and PCs should use screen savers and wallpaper appropriate to a business environment.

23. Every individual should ensure that the computer on which they have been working that day is switched off at the end of the working day except when it is necessary for the computer to be left switched on in order to allow remote access/working.

24. Games should not be played on any computers owned by the PRP.

When using the Internet

25. You must not use the internet for gambling.
26. You must not access or attempt to access any internet site or service, or any material on a site, which you know or suspect to be pornographic, illegal or likely (if disseminated) to be offensive to others. If you accidentally access any such site or material you must not save any material from it and must delete any accidentally saved, and must exit the site immediately. All such incidents must be logged and reported to the Chief Executive Officer.
27. Personal use of the internet, for example for booking holidays or shopping, should be kept to a minimum and should not, where possible, be in public area.
28. Be aware that web sites often keep a record of who has visited them, what was requested and from where.
29. Be aware that your web browser, by design, keeps its own records and copies of what sites you have visited and when.
30. You may only download files from the Internet where there is a genuine business need to do so. To avoid importing viruses you must run a virus check on all downloaded files prior to opening them.
31. You should be aware that the PRP could be bound by contracts that are entered into via the Internet. You must not, unless authorised, subscribe to any service via the Internet or commit the Panel to purchase any product or service.
32. In order to preserve the rights of the PRP to material and information which are its confidential property, no information should be publicised over the Internet or made available without the prior consent of the Chief Executive Officer.
33. Do
 - Only visit Internet sites that have a relevance to your business interests.
 - Ensure that password and access restrictions are in place (do not allow the software to retain the access password).
34. Don't
 - Leave the connection open longer than necessary.
 - Download software or files of any type as they can contain instructions to damage the software on your PC.

When using email

35. Assume that e-mail messages may be read by others and so do not include in your e-mails anything which would offend or embarrass any such reader, or would embarrass the PRP if it found its way to the public domain.
36. You must not use the PRP 's facilities to send, or solicit, any e-mail or other message where the content (or any attachment) is pornographic, sexist, racist, homophobic or in any other way discriminatory, harassing or defamatory or which in any way breaches the PRP's Equality, Diversity and Inclusion Policy. You must

immediately delete any e-mail or attachment you receive or access through the Panel's facilities that could be inappropriate.

37. If a recipient asks you to stop sending them personal messages then always immediately stop.
38. Never send messages from another person's e-mail account or under a name other than your own without the relevant account user's express permission or, where appropriate.
39. Never forward confidential messages by e-mail without specific authority from the original sender.
40. Never open an e-mail attachment from an unexpected or untrustworthy source.
41. Remember that e-mail messages are documents and so may be disclosed in legal proceedings if relevant to the issues.
42. Never send or forward private e-mails at work which you would not want a third party to read.
43. Do not create e-mail congestion by sending trivial messages or unnecessarily copying e-mails to those who do not have a real need to have them.
44. Do not advertise or forward "chain-mail" e-mails.
45. Always remember that text, music and other content on the Internet are copyright works. Never download or e-mail such content to others unless you are certain that the owner of such works allows this.
46. If sending important information by e-mail, always obtain confirmation of receipt (either a reply to your e-mail or by following up with a telephone call).
47. Never agree to terms or enter into contractual commitments or make representations by e-mail without having obtained proper authority.
48. When you type your name at the end of an e-mail, this act is just as much a signature as if you had signed it personally.
49. Never send strictly confidential messages via the Internet, or by other means of external communication which are known not to be secure.
50. If requested to forward such information over the Internet, make sure that the recipient knows that it is not totally secure and is willing to accept that risk.
51. Take care not to be taken in by emails falsely appearing to come from someone else associated with the PRP (particularly where the emails appear to instruct you to, for example, pay money). If in any doubt, ask the sender to confirm their identity, using another means of communication or similar method.
52. All email communication concerning PRP business must be done using the pressrecognitionpanel.org.uk email address, the only exception to this is email communications regarding administrative matters such as the scheduling of meetings.

Physical security of electronic devices

53. Everyone should also take appropriate steps to ensure the physical security of desktop computers, laptops, smartphones, tablets and USB sticks and other removable storage devices that contain confidential material. In particular you should not: leave devices in a car overnight; or leave devices unattended in a public place (although there is no objection to leaving them in a locked court-room during adjournments). Where possible, computers should not be placed so that their screens can be overlooked, especially in public places.

Laptops and other portable devices

54. Particular risks to confidentiality arise from the loss of confidential material held on laptop computers, smartphones, PDAs, USB sticks and other removable storage devices. A single portable device may contain very large amounts of confidential information. The loss of information may cause considerable embarrassment to third parties as well as being a breach of the Data Protection Act. Everyone should take as much care with this material as you would with your own valuables to prevent theft or loss. Everyone should restrict the amount of confidential material stored on portable devices to the minimum. Should a laptop or other portable device become lost or stolen, you should notify the Chief Executive Officer immediately so that your login password can be changed and, if possible, the data on your remote devices can be wiped.

Electronic security and encryption

55. External email increases the risk of importing a virus, not just by downloading of programs but embedding of those viruses within programs such as Word and Excel. A firewall is in place to filter out viruses from external e-mail received via the central email system. However, firewalls are not infallible, so any mail received from unknown or unexpected sources should be treated with extreme care. If you have any suspicion that the email you have received could contain a virus, do not open the email. Computers used at home should be protected from unauthorised and unrestricted access by third parties. The Information Commissioner's Office recommends that portable and mobile devices including magnetic media used to store and transmit personal information, the loss of which could cause damage or distress to individuals, should be protected using approved encryption software which is designed to guard against the compromise of information. Wherever practicable therefore, confidential material stored on laptop computers and other portable devices (such as memory sticks, CD-ROMs, removable hard disk drives, smartphones and PDAs) should be encrypted in a reasonably secure manner. The type of encryption that is appropriate will depend on the circumstances.

Communication

56. E-mail is a potentially insecure method of communication. Appropriate steps, such as encryption during transmission, should be taken if it is considered necessary to send particularly sensitive information by e-mail. You should never send the password required to decrypt an attachment in the same e-mail as the attachment since this would self-evidently defeat the purpose of encryption to avoid interception. If you arrange for e-mails to be sent to your mobile telephone, smartphone or PDA, you should ensure that the device is suitably password-protected with a nine

character password. Connecting to the internet via a (non PRP) wireless network presents a particular risk of interception of communication. Particular care should be taken when connecting via public and unencrypted access points. If you use a wireless network system in your home you should ensure that it is reasonably secure.

Phone calls

57. Reasonable usage of the PRP telephone system for personal purposes is permitted.

58. Such usage is based on mutual trust and an underlying assumption that everyone will use telephone system fairly and reasonably.

59. Personal telephone calls should only be made when necessary and should be kept to the minimum time required.

60. It is recommended that personal telephone calls should not be taken in any open or communal area.

Failure to comply with this policy

61. Breach of any of the conditions will be regarded as a disciplinary offence and serious breaches may constitute Gross Misconduct. If you fail to comply with rules and conduct in your use of the PRP's IT systems disciplinary action will be taken that may lead to your dismissal and, if appropriate, civil and/or criminal proceedings.

Agreed by the PRP Board, March 2015
Reviewed and updated by the PRP Board, March 2017
Reviewed and updated by the PRP Board, February 2018

Regulation of Investigatory Powers Act 2000

1. This Act covers the extent to which organisations can monitor or record communications at the point at which they enter or are being sent within the employer's telecommunications system, and applies to public and private communication networks. It gives the sender or recipient of a communication the right of action for damages against the employer for the unlawful interception of communications.

2. There are two areas where monitoring is not unlawful. These are:

- where the employer reasonably believes that the sender and intended recipient have consented to the interception
- without consent, the employer may monitor in the following circumstances, as set out in the Telecommunications (Lawful Business Practice) (Interception of Communications) Regulations 2000. These include: – to ensure compliance with regulatory practices e.g. Financial Services Authority requirements – to ensure standards of service are maintained, e.g. in call centres – to prevent or detect crime – to protect the communications system: this includes unauthorised use and potential viruses – to determine the relevance of the communication to the employer's business i.e. picking up relevant messages when someone is away from work.

3. The PRP will only monitor or record communications in accordance with these provisions. Moreover, the PRP will make all reasonable efforts to ensure that system users know that communications may be intercepted, and any such monitoring will also comply with the provisions of the Data Protection Act 1998 (see below), and in particular the Data Protection principles on fair processing.

Data Protection Act 2018

4. The Information Commissioner – responsible for enforcement of the Data Protection Act – published a code of practice to help employers comply with the provisions of the Data Protection Act 1998. The Employment Practices Code clarifies the Act in relation to processing of individual data, and the basis for monitoring and retention of email communications. Part 111 of the Code covers monitoring at work. All are available from the Commissioner at www.dataprotection.gov.uk The code of practice *Monitoring at work: an employer's guide* states that any monitoring of emails should only be undertaken where:

- the advantage to the business outweighs the intrusion into the workers' affairs
- employers carry out an impact assessment of the risk they are trying to avert
- workers are told they are being monitored
- the information discovered is kept secure
- employers are careful when monitoring personal communications such as emails which are clearly personal

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- employers only undertake covert monitoring in the rarest circumstances where it is used for the prevention or detection of crime.

5. The PRP will comply with these principles and the updated guidance when issued by the Commissioner, in deciding when monitoring may be required and in carrying out any such monitoring activity.



Health and Safety Policy

Recommendation: Updated to reflect current operational practise.

1. The Executive are located in **co-shared service**d offices which are open Monday to Friday 8.30-6.00. The cleaning is undertaken by the service provider on a daily basis as part of our contractual agreement.
2. We genuinely care about the health and safety of our Board Members and staff and this is reflected in this health and safety policy.
3. The statement of general policy and arrangements at Annex A is based on a sample policy statement and other guidance available on the HSE website at www.hse.gov.uk/risk. This has helped us to think about the things that should be documented and built into our own Health and Safety policy, and includes elements such as remote working, staff consultation and training etc. Susie Uppal, Chief Executive Officer, has been designated as the most competent (experienced and capable) person to take responsibility for health and safety issues. She is supported her role by Saima Ansari, Executive Administration Manager. Their respective roles are identified on the following pages.
4. Following the move of the Executive to **homeworking and co-sharing services** offices, it has been assessed that the home working is low risk due to the purely office type nature of the work. No further risk assessment is deemed necessary at this stage and the CEO will continue to monitor the situation.
5. The Health and Safety policy is signed off by the Board and we will review regularly and update the document.
6. Accidents and ill health at work will be reported under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations) <http://www.hse.gov.uk/riddor>

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Reviewed and updated by the PRP Board, March 2017
Reviewed and updated by the PRP Board, April 2018

Annex A

This is the statement of general policy and arrangements for the Press Recognition Panel		
Susie Uppal – Chief Executive Officer has overall and final responsibility for health and safety		
Statement of general policy	Responsibility of: Name/Title	Action/Arrangements
Prevent accidents and cases of work-related ill health by managing the health and safety risks in the workplace	Susie Uppal Chief Executive Officer	Relevant risk assessments completed and actions arising out of those assessments implemented. (Risk assessments reviewed when working habits or conditions change.)
Provide clear instructions and information, and adequate training, to ensure employees are competent to do their work	Susie Uppal Chief Executive Officer	We will ensure that suitable arrangements are in place to cover employees engaged in work remote from the main office.
Implement emergency procedures – evacuation in case of fire or other significant incident.	Spaces Susie Uppal Chief Executive Officer	Spaces are responsible for 1. Ensuring escape routes well signed and kept clear at all times. 2. Evacuation plans are tested from time to time and updated as necessary. Susie is responsible for ensuring staff are aware of the evacuation procedures in place and accounting for staff present in our office on the day of an incident.
Maintain safe and healthy working conditions, provide and maintain equipment and machinery, and ensure safe storage.		Spaces provide: Toilets, washing facilities and drinking water Canteen services Kitchen facilities including hot water, microwave and fridge Spaces have systems in place for routine inspections and testing of equipment and machinery and for ensuring that action is promptly taken to address any defects.
Signed: (Employer)		Date:

Health and safety law poster is displayed at (location)	Communal area
First-aid box is located:	Communal area
Accident book is located:	Communal area

Terms and Conditions of Service for Board Members

Recommendation: For general review - no change recommended.

Basis for appointment

1. This document sets out the terms and conditions under which your appointment has been made as a Member of the Board of the Recognition Panel established under the Royal Charter on Self-Regulation of the Press. Under the terms of the Charter you are appointed for an initial term of five years and you are eligible for reappointment for a further period of up to three years. The responsibilities and duties of your office and of the Press Recognition Panel (PRP) are set out in the Charter.

Excluded and restricted activities

2. The Royal Charter places certain restrictions on political activity of Board Members and staff. In relation to Board Members, Schedule 1, 3.3 of the Royal Charter states:
'In order to ensure the independence of the Board, a person shall be ineligible to be appointed, or to remain as a Member of a Board if he...is a member of the House of Commons, the Scottish Parliament, the Northern Ireland Assembly, the National Assembly for Wales, the European Parliament or the House of Lords (but only if, in the case of the House of Lords, the member holds or has held within the previous 5 years an official affiliation with a political party).'
3. It would be inappropriate given the PRP's status as wholly independent of government for any Board Member to engage in active politics. The list of barred activities includes:
 - seeking selection as a candidate for, or being a candidate for, one of the bodies mentioned in the paragraph above, as per the Royal Charter; Membership – or seeking selection as a candidate or prospective candidate – of local authorities (with the exception of parish councils);
 - seeking adoption or selection as a candidate or prospective candidate for election as a Police and Crime Commissioner; and holding any office, performing any role or undertaking any activity within or in relation to a political party which allows or requires the person to speak on behalf of that party or a candidate standing on its behalf in an election or which involves them doing so.
4. You must:
 - to the best of your ability act in a way which maintains political impartiality and is in line with the maintaining the absolute independence of the PRP, no matter what your own political beliefs are;
 - act in a way which deserves and retains the confidence of everyone with an interest in the PRP's work; and

- comply with any restrictions that have been laid down on your political activities.
5. You must not:
 - act in a way that is determined by party political considerations, or use PRP resources for party political purposes; and
 - allow your personal political views to determine any advice you give or your actions.
 6. Advice is available from the Chair or Chief Executive Officer.

Confidentiality

7. It is expected that Board Members shall not during, or at any time after the termination of their appointment with the PRP use for his or her own purpose or for another's benefit or disclose to any third party confidential material and shall use his or her best endeavours to prevent such publication or disclosure. In this context, 'confidential' information means any information or matter which is not in the public domain and which relates to the affairs of the Panel or any of its business contacts.

Remuneration and time commitment

8. Board Members' remuneration is regularly reviewed in line with best practice. Board members are expected to commit to 20 days per annum, and the Chair to 60 days per annum.

Expenses

9. You are eligible to claim expenses in accordance with the PRP's expenses policy.

Expression of views

10. All invitations addressed to Board Members to attend or speak at stakeholder events or to comment on social media in respect of PRP related matters should be referred to the Chair. Care will be taken to ensure that there is appropriate Board representation at events and that Board Members are properly briefed in advance of attendance. In the normal course of events, the Chair on behalf of the Board will be the nominated spokesman.
11. In relation to requests for meetings with the Board, these should normally be referred to the Chair in the first instance.
12. All contact with individuals and organisations will be formal and documented. Unless a meeting takes place in the context of our Whistleblowing policy, the fact of a meeting having taken place will be subject to public record, even if the content of meetings are held confidentially.
13. Informal contact by bodies or individuals will be recorded if relevant.

14. Board Members will take care to avoid saying or doing anything on social media that negatively impacts on the PRP's reputation. Board Members will not engage with the media about the PRP without express agreement of the Chair.

Declaration of Registrable Interests

15. The PRP maintains a register of Board Members' disclosable interests which is a public document published on the PRP's website. The purpose of the register is to ensure transparency in relation to any interests of Board Members, or of their spouses, partners and dependent children.
16. Board Members are required to make a declaration of interests for the purposes of the register immediately on taking up appointment as a Board Member and are required subsequently to declare any new matter that is required to be included on the Register as soon as possible after it arises, in accordance with the PRP's Board rules of procedure.
17. Board Members are asked to review all aspects of their personal and professional life (and those of individuals linked to them both personally and professionally) in order to identify which interests, if any, may be perceived by the public as directly or indirectly influencing or affecting their judgement or as benefiting them. For example:
 - any position of authority in a charity or voluntary body;
 - connection with anybody which contracts with or is likely to contract with the PRP;
 - directorships in public and private companies including non-executive directorships;
 - majority or controlling shareholdings in any undertaking;
 - ownership of any company, business or consultancy; and
 - remunerated employment, consultancy, trade, profession or vocation.
18. The primary consideration which will determine whether or not an interest should be declared is the reasonable perception of the public rather than whether the interest will have an actual influence or benefit. The latter is relevant only to the issue of resolving potential conflicts and not the decision to declare.
19. You may be excluded from any discussion or consideration of any matter in which you have disclosed or declared an interest.
20. It is the duty of each Board Member to declare any matter that is required to be included in the register. If a Board Member is in doubt as to whether or not a particular matter should be declared, they should discuss the conflict or perceived conflict with the Chair who will provide confidential guidance.

Indemnity

21. A Chair or Board Member who has acted honestly and in good faith will not have to meet out of his or her own personal resources any personal civil liability

which is incurred in the execution or purported execution of his or her Board function, save where the person has acted illegally or recklessly. Any costs arising in this way will be met by the PRP. To minimise the risk, Members are expected to act in accordance with the Board's policies and procedures at all times.

Reviewed and updated by the PRP Board, July 2018

Terms and Conditions of Service for Independent Members

[Recommendation: For general review – no change recommended.](#)

Basis for appointment

1. This document sets out the terms and conditions under which your appointment has been made as an Independent Member of a Committee of the Press Recognition Panel (PRP) Board. The period of your appointment and reappointment, responsibilities and duties of your role are set out in your person specification and appointment letter.

Restricted activities

2. It would be inappropriate given the PRP's status as wholly independent of government for any Independent member to engage in active politics.
3. You must:
 - to the best of your ability act in a way which maintains political impartiality and is in line with the maintaining the absolute independence of the PRP, no matter what your own political beliefs are; and
 - act in a way which deserves and retains the confidence of everyone with an interest in the PRP's work.
4. You must not:
 - act in a way that is determined by party political considerations or use PRP resources for party political purposes; and
 - allow your personal political views to determine any advice you give or your actions.
5. Further advice is available from the PRP Board Chair (Chair) or Chief Executive Officer.

Confidentiality

6. It is expected that Independent members shall not during, or at any time after the termination of their appointment with the PRP use for his or her own purpose or for another's benefit or disclose to any third party confidential material and shall use his or her best endeavours to prevent such publication or disclosure. In this context, 'confidential' information means any information or matter which is not in the public domain and which relates to the affairs of the PRP or any of its business contacts.

Remuneration and time commitment

7. Independent members' remuneration is regularly reviewed in line with best practice. The time commitment will be as agreed in the individual appointment letters.

Expenses

8. You are eligible to claim expenses in accordance with the PRP's expenses policy.

Expression of views

9. All invitations addressed to Independent members to attend or speak at stakeholder events or to comment on social media in respect of PRP related matters should be referred to the Chair. Care will be taken to ensure that there is appropriate PRP representation at events and that Members are properly briefed in advance of attendance. In the normal course of events, the Chair on behalf of the Board will be the nominated spokesman.
10. All contact with individuals and organisations in relation to the work of the PRP will be formal and documented. Unless a meeting takes place in the context of our Whistleblowing policy, the fact of a meeting having taken place will be subject to public record, even if the content of meetings are held confidentially.
11. Informal contact by bodies or individuals will be recorded if relevant.
12. Independent members will take care to avoid saying or doing anything on social media that negatively impacts on the PRP's reputation. Independent Members will not engage with the media about the PRP without express agreement of the Chair.

Declaration of Registrable Interests

13. The PRP maintains a Register of disclosable interests which is a public document published on the PRP's website. The purpose of the Register is to ensure transparency in relation to any interests of Board and Independent Members, or of their spouses, partners and dependent children.
14. Members are required to make a declaration of interests for the purposes of the Register immediately on taking up appointment as an Independent member and are required subsequently to declare any new matter that is required to be included on the Register as soon as possible after it arises, in accordance with the PRP Board's rules of procedure.
15. Members are asked to review all aspects of their personal and professional life (and those of individuals linked to them both personally and professionally) in order to identify which interests, if any, may be perceived by the public as directly or indirectly influencing or affecting their judgement or as benefiting them. For example:
 - any position of authority in a charity or voluntary body;
 - connection with anybody which contracts with or is likely to contract with the PRP;

- directorships in public and private companies including non-executive directorships;
 - majority or controlling shareholdings in any undertaking;
 - ownership of any company, business or consultancy; and
 - remunerated employment, consultancy, trade, profession or vocation.
16. The primary consideration which will determine whether or not an interest should be declared is the reasonable perception of the public rather than whether the interest will have an actual influence or benefit. The latter is relevant only to the issue of resolving potential conflicts and not the decision to declare.
 17. You may be excluded from any discussion or consideration of any matter in which you have disclosed or declared an interest.
 18. It is the duty of each Independent member to declare any matter that is required to be included in the Register. If a Member is in doubt as to whether or not a particular matter should be declared, they should discuss the conflict or perceived conflict with the Chair who will provide confidential guidance.

Indemnity

19. An Independent member who has acted honestly and in good faith will not have to meet out of his or her own personal resources any personal civil liability which is incurred in the execution or purported execution of his or her Committee function, save where the person has acted illegally or recklessly. Any costs arising in this way will be met by the PRP. To minimise the risk, Members are expected to act in accordance with the Board's policies and procedures at all times.

Senior Independent Board Member – Role and Responsibilities

Recommendation: For general review – no change recommended.

1. Purpose

The Senior Independent Board Member's role is to:

- 1.1. act as a sounding board for the Chair of the Board;
- 1.2. serve as an intermediary for other Board Members; and
- 1.3. formally manage the appraisal of the Chair's performance annually.

2. Responsibilities

The Senior Independent Board Member will as necessary and appropriate:

- 2.1. act as sounding board for the Chair in any matter which the Chair may determine appropriate;
- 2.2. act as a trusted intermediary when necessary between the Chair and other Board Members;
- 2.3. convene and chair (once annually, as a minimum) a meeting of the Board without the Chair present to facilitate the annual appraisal of the Chair and on such occasions as are deemed appropriate;
- 2.4. report to the Board annually on the fulfilment of the responsibilities of the Senior Independent Board Member;
- 2.5. in the absence of the Chair for any prolonged period, perform the functions of the Chair as set out in the Royal Charter, and as set out in all Panel policies and procedures; and
- 2.6. chair the Nominations Committee when it is dealing with the matter of succession to the chairmanship of the PRP.

3. Term of Office

- 3.1. The term of office will be two years with the possibility of renewal for a further two years subject to Board approval. The maximum term of office will be four years; and
- 3.2. appointment or removal from office is a decision reserved to the Board.



PRESS RECOGNITION PANEL BOARD

BOARD SUCCESSION PLANNING

Meeting: 26 February 2019

Status: For decision

Lead responsibility: David Wolfe, Chair,
Susie Uppal, CEO

Contact details: Saima Ansari

Purpose

1. The purpose of this paper is to present the Board with the recommendations of the Nominations Committee in respect of the re-appointment periods for the Chair and members and the timetable for succession planning for new members.

Background and Analysis

2. At its meeting on 18 December 2018, the Board considered a paper that set out the high-level principles for the reappointment process for serving members and the process for the future appointment of the Board.
3. The Board agreed that Harry Rich should be a member of the Nominations Committee, alongside the Chair and the Independent member Cindy Butts, to provide additional robustness to the appointments process
4. The Board agreed the high-level principles underpinning the reappointments process. The Board also agreed in principle that the recruitment activity for the Chair and Board appointments will be condensed to be undertaken in the agreed years in order to minimise costs and ensure effective campaigns, taking into account the end of the staggered second periods of appointment.
5. It was agreed that the Nominations Committee would bring recommendations to the Board concerning the reappointment of the Board and would also consider the high-level principles that will underpin the recruitment process and provide details of the proposed recruitment campaign and timeframes for consideration. The Nominations Committee met on 5 and 19 February 2019.

Board re-appointments

6. The Committee considered the principles that should underpin all public appointments as set out in the Governance Code on Public Appointments (December 2016) and guidance provided by the Independent member in respect of the re-appointments process. The key principles considered are detailed below:

6.1 Merit and Fairness

- Appointments should be based on merit.
- The process should be consistent across all Board members of the PRP Board

6.2 Openness

- The process to be followed should be clear and communicated to all Board members, including the basis on which decisions to stagger appointments will be made.
- The process and outcome should be communicated/ minuted as appropriate publicly in line with the Board's policy of openness and transparency.

6.3 Evidenced based

- Consideration to reappoint current Board members or to refuse reappointment should be based on the current and future needs of the organisation and should be informed by the business plan/work plan and any relevant governance/board performance reviews.
- Reappointments should take into account the skills matrix of the current Board composition.
- Reappointments should be made with the benefit of Board member appraisals.

6.4 Rules based

- Reappointments should be in-line with any provisions related to reappointments that are contained within the Charter. Paragraph 5 of Schedule 1 of the Charter stipulates the tenure of serving Members:

5.2 Each member shall be eligible to serve for an initial term of 5 years and shall be eligible to reappointment for a further period of up to 3 years. The Board shall have regard to the importance of staggering the reappointment and retirement of Members to deliver appropriate continuity in the performance of its functions.

6.5 Diversity

- Diversity should be considered at every stage of the process.

7. The Committee considered the recently completed skills matrixes provided by each of the members, the attendance record for the past three financial years and the appraisal summaries provided by the Chair. The Committee also noted the register of interests. On the basis of the evidence provided, the Committee noted that there would be no concerns about considering a further re-

appointment period for the members. The Chair advised that all of the members had confirmed during recent discussions that they were content to continue supporting the organisation as necessary.

8. The Committee discussed the various external factors that have an impact on the recognition system and the recent media coverage concerning the potential oversight of social media platforms. It was noted that there continued to remain a considerable degree of uncertainty and it was anticipated that we would have greater clarity in the following year.
9. The Committee reviewed the current and future needs of the organisation. It was agreed that at present, there are no significant gaps in the Board's collective knowledge in meeting the mandatory skills and experience requirements as detailed in the Charter. The Board had in the past identified that specialist media and social media platforms knowledge might be helpful in particular; however, it was noted that technical expertise could be brought in as necessary. It was observed that the Chair's legal knowledge was a crucial skill, as demonstrated through clear articulation of the legal framework of the Charter to stakeholders. As the spokesperson for the PRP, the Chair had been able to succinctly and accurately explain the legal technicalities of both the Charter and additional legislation in lay terms. Moving forward, it was noted that should a Board member have current and practising legal expertise, it would not be necessary for a future Chair to also have this knowledge. It did however, have its advantages if the Chair remained as the PRP's spokesperson.
10. On the basis of the above information, the Committee considered the optimum re-appointment periods, having due regard to the requirement to ensure that the appointments are staggered to ensure continuity of the organisation.
- 10.1 The Committee considered the following two potential reappointment terms for the Chair:

Option 1 – 17 June 2019 to 16 June 2022

Option 2 – 17 June 2019 to November 2021

The advantage of Option 1 is that a new Chair could be recruited alongside the recruitment cycle for Board members in 2021 with a view to having a detailed handover period with the incumbent Chair. It was noted that a six-month handover in respect of the Chair's handover would be preferable to ensure a smooth and effective transition. It was agreed that it would not be good practice to have new members and a Chair starting at the same time. It was noted that the Chair could also retire earlier should this be in the best interests of the organisation following the recruitment of a new Chair and as agreed by the Board.

- 10.2 The Committee considered the various recruitment terms that had been considered by the Board in past meetings and after detailed discussion, agreed in principle the following re-appointment cycles for members:

Pool 1 - 3 November 19 – 2 November 2020 (1-year term), and;

Pool 2 - 3 November 19 – 2 November 2021 (3-year term).

11. The Committee discussed the advantages of having two members recruited next year and a further two members in three years to provide sufficiently balanced continuity to the Board.
12. The Committee noted that the planned departure of two members would clarify the specific skills sets that should be considered as part of the recruitment campaign, in addition to those identified at paragraph 10 above. The Committee discussed the potential number of members that could be recruited moving forward and noted that in the past, it had been felt that 5 members provided sufficient robustness and experience whilst allowing a certain degree of flexibility to recruit a specialist member should it be required.
13. The recruitment cycle of two rounds would mean that the Chair's position could be recruited in the second round. The Committee discussed the advantages of fewer recruitment campaigns and the ability to ensure that resources were better targeted at ensuring more diverse and detailed recruitment campaigns. It was agreed that the Independent member would suggest potential networks and external recruitment agencies for further consideration by the Committee. The Committee reviewed the mandatory Charter criteria and confirmed that this should not preclude better representation from currently underrepresented groups. It would however be vital to ensure that the recruitment campaigns were sufficiently wide and targeted. The timetable would factor in sufficient opportunity to check reach and take remedial action, if required, to widen the responses.

Implications

14. The recommended decision would have the following implications on:
 - 14.1 **Budget** – budgetary considerations will be dependent on the timing and process of the recruitment campaign, including the potential use of recruitment consultants;
 - 14.2 **Legislation** – appointments need to be made in line with the Charter; and
 - 14.3 **Resources** – resource implications will occur for the CEO and Executive Administration Manager should the recruitment campaign / part of the recruitment campaign for new members be managed internally. There will be a greater degree of involvement for the Nominations Committee whilst undertaking the processes for both the reappointments and appointments of the Board. There will be external costs depending on how the search for new Board Members is conducted.

Devolved Nations

15. There are no implications for the devolved nations of these decisions.

Communications

16. The Board's decisions and supporting papers will continue to be published on the PRP's website in line with usual practise.

Risks

17. The timely appointment of the new Board members whilst ensuring that the Board continues to have the requisite skills and experience is key. There continues to be uncertainty created by the political involvement in the recognition system. The developments concerning social media platforms and the changing media landscape also creates challenges in identifying the future skill set that may be required by the Board.

Recommendations

18. The Board is invited to **agree** in principle that the re-appointment period for the Chair should be for three years from 17 June 2019 to 16 June 2022, noting that the Chair may resign from the role earlier subject to the needs of the organisation and the recruitment of a suitable Chair.
19. The Board is invited to **agree** in principle the idea that the re-appointment period for the members should be for 1-year and 3-year periods respectively. Further details will be provided to the Board in August.

Timeline for future work

20. The Committee **agreed** the following timetable for action:
 - 20.1 Nominations Committee meeting – 9 July 2019: to finalise the re-appointment periods of the members and the Chair. The Senior Independent Board member, Harry Cayton, would be invited to attend the meeting to discuss the Chair's role and that of Board member Harry Rich. The recommendation for the re-appointments would be made for the Board's agreement at its meeting on 27 August 2019.
 - 20.2 Board meeting 27 August 2019 – Board to consider the Committee's recommendations for reappointments.
 - 20.3 Board meeting – February 2020: The Committee to make a recommendation as to the number of members that should be recruited, the skills set, and experience required and the detailed process to be followed as part of the new recruitment cycle.
 - 20.4 July 2020 – first recruitment campaign completed and substantive appointments to be made.