



Twitter UK
20 Air Street
London
W1B 5AN

twitter.com

Wednesday 5 December 2018

Dear David,

Please accept this letter as Twitter UK's response to your 'Call for Information' ahead of the publication of your 2018 statutory report. Specifically, I wanted to respond to the Call for Information itself:

"As part of our 2018 report on the recognition system, we will provide an assessment of IPSO and some of the major publishers which are not members of IPSO including BuzzFeed UK, Facebook, the Financial Times, Google, the Guardian, HuffPost, the Independent, LADBible, Pink News, Private Eye, Reuters, Snapchat, Twitter, and Yahoo! News."

It is important to note that under Twitter's Terms of Service, users are responsible for the content they publish on the platform. To suggest Twitter is a publisher is at odds with the statutory definition of "relevant publisher" in s.41 of the Crime and Courts Act 2013 and incongruous with the E-Commerce Directive.

Additionally, PRP's own Charter makes clear that Twitter is not in scope, and therefore we would question the appropriateness of conducting an assessment of apparent compliance with the criteria in Schedule 3 of your Royal Charter. I note The Financial Times took a similar view in their letter dated 8 October 2018.

Furthermore, we do not understand the basis upon which the list of non-IPSO members has been compiled. This list is not based on any public or statutory criteria, and there is no established authority for this process to be conducted.

Thank you and best wishes,

Katy Minshall
Head of UK Government, Public Policy and Philanthropy