



Register of Interests

February 2022

As a regulator, IMPRESS holds its members to high standards of transparency and accountability. As an organisation, IMPRESS holds itself to these same high standards.

IMPRESS Board Members and senior management publicly declare any interests that a member of the public, acting reasonably, would consider might influence their words, actions and decisions.

IMPRESS Board Members and senior staff have declared their interests in accordance with the stipulations set out in our Code of Conduct. The relevant section is listed below:

Conflicts of interest and perceptions of bias

1. IMPRESS maintains a Register of Interests, which is a public document, published on IMPRESS's website. The purpose of the Register is to ensure transparency in relation to any interests of **Board members** and the **Chief Executive Officer (CEO)**, or of their spouses, partners and dependent children.
2. Board Members and the CEO are required to make a declaration of interests for the purposes of the Register immediately on taking up their appointment, 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.
3. **Committee members, employees (other than the CEO) and consultants** are not required to complete the Register of interests.
4. **Board Members** and the **CEO** are asked to review their personal and professional life and that of any spouse, partner or dependent children, in order to identify which current or former interests, if any, might reasonably be perceived by an independent bystander as directly or indirectly influencing their judgement. Such interests may include:
 - 4.1. Membership of any political party;
 - 4.2. Position of authority in a charity or voluntary body;
 - 4.3. Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers;
 - 4.4. Directorships in public and private companies including non-executive directorships;
 - 4.5. Majority or controlling shareholdings in any undertaking;
 - 4.6. Ownership of any company, business or consultancy;
 - 4.7. Remunerated employment, consultancy, trade, profession or vocation;

- 4.8. Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might reasonably be viewed by an independent bystander as compromising (i) that representative's ability to take fair and impartial decisions in accordance with IMPRESS's role as a regulator; or (ii) IMPRESS's openness to membership by all relevant news publishers on fair, reasonable and non-discriminatory terms; and
- 4.9. Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement in the exercise of their functions within IMPRESS.
5. It is the duty of each Board Member and the CEO to declare any matter that is required to be included in the Register when it may be relevant to an IMPRESS decision or process and to ensure that the Board follows the provisions set out in the IMPRESS Articles of Association 14.4-5 in relation to conflicts of interest including recusal where appropriate.
6. The primary consideration which will determine whether or not an interest should be declared is the reasonable perception of an independent bystander rather than whether the interest will have an actual influence. The latter is relevant only to the issue of resolving potential conflicts and not the decision to declare.
7. Board members, the CEO **and any IMPRESS representative who is responsible for advising the Board** (on issues including but not limited to complaints, arbitration claims and investigations) must declare at the earliest opportunity (a) any interest that is relevant to a particular issue under consideration; and (b) any issue that could give rise to a reasonable perception of bias on the part of an independent bystander.
8. IMPRESS representatives may be recused from the discussion of and decision on any matter in which they have disclosed an interest.
9. Regardless of whether an interest has been declared or not, **IMPRESS representatives** must be recused from the discussion of, and decision on, any matter on which an independent bystander would reasonably perceive that there is a real risk that they are biased. The Annex discusses factors that may be relevant to IMPRESS representatives' recusal decisions, depending on the circumstances.

The Code of Conduct clearly states that any declaration of an interest in the Register of Interests does not remove the obligation to declare in meetings all interests, whether registrable or not, which are relevant to the business being conducted.

Register of Interests



Director name	Position(s)	End of tenure	Date ROI created	Last updated	Last reviewed
Cordella Bart-Stewart	Non-Executive Director, Code Committee member	July 2024	12/07/20	-	12/04/21
Debrah Harding	Non-Executive Director, Finance & Audit Committee member	July 2024	12/07/20	27/03/21	27/03/21
Shelina Janmohamed	Non-Executive Director, Code Committee member	Oct 2023	01/11/19	-	01/04/20
David Leigh	Non-Executive Director	Nov 2024	01/12/17	16/04/20	12/04/21
Walter Merricks	Chair, Non-Executive Director, Code Committee member, Communications Committee member, Finance & Audit Committee member	Mar 2022	17/08/15	12/04/21	12/04/21
David Robinson	Senior Non- Executive Director, Treasurer, Chair of Finance & Audit Committee, Communications Committee member	Sep 2022	02/08/15	13/04/21	13/04/21
Pam Vick	Non-Executive Director, Communications Committee Chair, Finance & Audit Committee member	Oct 2023	01/11/19	18/02/22	01/04/21
Andrea Wills	Non-Executive Director, Chair of Code Committee	Nov 2025	01/12/17	01/04/19	05/04/21
Staff name	Position		Date ROI created	Last updated	Last reviewed
Ed Procter	Chief Executive Officer	N/A	14/07/17	02/03/20	15/04/21

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In completing this Register of Interests, Board Members and senior management are asked to comply with the letter and the spirit of the Code of Conduct, which incorporates the Nolan Principles.

Name: Cordella Bart-Stewart

Position: Non-Executive Director

Date of appointment: 13/07/20

Interest	Current	Former (give dates)
Membership of any political party.	Labour Party on and off last joined December 2019	
Position of authority in a charity or voluntary body.	Church Parochial Council St Andrews Church Southgate registered charity	
Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.	None	
Directorships in public and private companies	Director Black Solicitors Network private limited non profit company	

including non-executive directorships.		
Majority or controlling shareholdings in any undertaking.	None	
Ownership of any company, business or consultancy.	None	
Remunerated employment, consultancy, trade, profession or vocation.	Fee paid Consultant Stewart & Co Solicitors Fee paid First tier Tribunal Judge	
Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might reasonably be viewed by an independent bystander as (i) compromising IMPRESS's fairness and impartiality as a regulator; or (ii) compromising IMPRESS's openness to all news publishers on fair, reasonable and non-discriminatory terms.	No.	
Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.	Statements on the case for diversity and inclusion	

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Name: Debrah Harding [including details for my partner, Aled Evans]

Position: Non-Executive Director, Finance & Audit Committee member

Date of appointment: 21st July 2020

Form last updated: 27 March 2021

Interest	Current	Former (give dates)
Membership of any political party.	DH: None AE: None	DH: None AE: Member of the Liberal Democrats circa 1988-1993
Position of authority in a charity or voluntary body.	DH: Chair and Founding Member of the Global Research Business Network (GRBN) DH: Vice President of the European Federation of Associations of Market Research Organisations (EFAMRO)	DH: Trustee of McDougall Trust (Jan 2014 to December 2018) incl. Treasurer AE: None

	AE: None	
Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.	DH: Audit Bureau of Circulation (ABC) provides audit services to support my employer, The Market Research Society (MRS), for its Fair Data trust mark. AE: current employer (Deductive Ltd (a MarketCast company)) has clients which include a range of international media, entertainment and technology companies. Some of these clients will have news publishing divisions.	DH: Audit Bureau of Circulation (ABC) as a member of audit and marketing staff 1994 – 1999 AE: Occasional analyst articles published in international media business press (e.g. Television Business International). Related to employment as a media analyst for Omdia/ IHS Markit Technology 2017-2020. AE: BBC Radio Producer and Developer 1993-2000 (including role as producer of ‘The News Quiz’ (1994-1997) and ‘The Now Show’ (1998-1999);
Directorships in public and private companies including non-executive directorships.	DH: Director (representing my employer, MRS) of JICPOPS (the Joint Industry Committee for Population Standards)	DH: Director (representing my employer, MRS) of the Market Research Quality Standards Association circa 1999-2012 (when the association ceased)
Majority or controlling shareholdings in any undertaking.	DH: None AE: None	DH: Minority shareholder of partner’s business, Quickfire Entertainment Limited - December 2005 to June 2014

		AE: None
Ownership of any company, business or consultancy.	DH: None AE: None	DH: None AE: Owner of own company, Quickfire Entertainment Limited, as a freelance media consultant/ producer - December 2005 to June 2014
Remunerated employment, consultancy, trade, profession or vocation.	DH: Managing Director, the Market Research Society DH: Committee Member, British Standards Institution (BSI), Standards, Policy & Strategy Committee (remunerated position) AE: Project Manager, Deductive (a MarketCast company) Dec 2020 – current.	DH: ABC (1994-1999) DH: Casson Beckman (1991-1994) AE: Senior Analyst, Omdia (previously part of IHS Markit Technology before it was acquired in 2019) (2017–2020) AE: Freelance media consultant/ producer (2002-2017) AE: Development Producer, Tiger Aspect (2000-2002) AE: BBC Radio Producer & Developer (1993-2000)
Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might	DH: None that I am aware of AE: None that I am aware of	DH: None that I am aware of AE: An annual guest lecture & seminar (2015 onwards) for the LLM Entertainment Law

reasonably be viewed by an independent bystander as (i) compromising IMPRESS's fairness and impartiality as a regulator; or (ii) compromising IMPRESS's openness to all news publishers on fair, reasonable and non-discriminatory terms.		master's students at Westminster Law School based on my LLM dissertation: 'Social television and the law'. This includes a brief overview of current TV & internet regulation landscape from a legal perspective. The lecture/seminar also examines the current and future challenges for TV and video content regulation.
Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.	DH: Financial donation to UNICEF, Fellow of the Academy of Social Sciences and Fellow of the RSA (the Royal Society for the encouragement of Arts, Manufactures and Commerce); subscriber to Vanity Fair AE: More United supporter (monthly donation). Member of Royal Television Society (RTS). Monthly donation to The Conversation, plus monthly donations to the charities Shelter, Crisis and Friends of the Earth. Fellow of the RSA (the Royal Society for the encouragement of Arts, Manufactures and Commerce).	DH: financial donations to Save the Children and NSPCC (circa 2001-2012) AE: One off financial donation to Liberal Democrats (circa Nov 2019). One off donation to More United (circa Nov 2019) One off donation to People's Vote/Open Britain (circa Oct 2019)

	Member of Humanists UK. Subscriber to The Guardian (membership tier: 'Supporter'), The Week, Scientific American and the Radio Times.	
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Name: Shelina Janmohamed

Position: Non-Executive Director, Code Committee member

Date of appointment: 01/11/2019

Interest	Current	Former (give dates)
Membership of any political party.	None	None
Position of authority in a charity or voluntary body.	None	Trustee, Windsor Fellowship (voluntary, unpaid)
Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.	Employment with Ogilvy Freelance contributor to: The National UAE Irregular freelance contributor to The Guardian, The Telegraph, Campaign magazine	
Directorships in public and private companies	Director 68 KGS Ltd (private property)	None

including non-executive directorships.		
Majority or controlling shareholdings in any undertaking.	None	None
Ownership of any company, business or consultancy.	None	None
Remunerated employment, consultancy, trade, profession or vocation.	Employment with Ogilvy Freelance contributor to: The National UAE Irregular freelance contributor to The Guardian, The Telegraph, Campaign magazine	
Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might reasonably be viewed by an independent bystander as (i) compromising IMPRESS's fairness and impartiality as a regulator; or (ii) compromising IMPRESS's openness to all news publishers on fair, reasonable and non-discriminatory terms.	I write a weekly op-ed column for The National UAE on a wide range of social and cultural issues including racism and Islamophobia I always aim to be fair and factual. I have a twitter feed in which I cover similar issues I have been critical of the government policy on Prevent My twitter feed is @loveinheadscarf I have a blog where I used to publish original material. It then became a place to repost my newspaper pieces. As of writing this no new	

	content has been published	
Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.	None	

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Name: David Leigh

Position: Non-Executive Director

Date of appointment: 01/12/17

Form last updated: 16/04/20

Interest	Current	Former (give dates)
Membership of any political party.	Labour party (Sleeping member)	None
Position of authority in a charity or voluntary body.	None	Trustee, Centre for Investigative Journalism Ltd (2008-14)
Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.	None	None
Directorships in public and private companies including non-executive directorships.	Charlotte Properties (Doughty St) Ltd (freehold share of own flat)	None

Majority or controlling shareholdings in any undertaking.	None	None
Ownership of any company, business or consultancy.	None	None
Remunerated employment, consultancy, trade, profession or vocation.	Senior Research Fellow, City, University of London	Professor of Journalism, City, University of London Investigations Editor, The Guardian 2000-2013, Consultant 2013-15
Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might reasonably be viewed by an independent bystander as (i) compromising IMPRESS's fairness and impartiality as a regulator; or (ii) compromising IMPRESS's openness to all news publishers on fair, reasonable and non-discriminatory terms.	None that I am aware of	None that I am aware of
Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.	• Advisory board, Gothenburg University • Founder-member, International Consortium of Investigative Journalists, Washington DC • Member of "Liberty" (civil liberties organisation)	Former staff member of The Scotsman, The Times, Thames TV, Granada TV, Observer (all prior to 2000)

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Name: Walter Merricks

Position: Chair, Non-Executive Director, member of the Code Committee, member of the Communications Committee, member of the Finance & Audit Committee

Date of appointment: 01/10/15

Form last updated: 12/04/21

Interest	Current	Former (give dates)
Membership of any political party.	None	Labour approx 1985-99
Position of authority in a charity or voluntary body.	Justice, board member	Justice, Chair from 2016 to 2020 Camden Community Law Centre, Director, 1972-76 Donor Conception Network, Chair 1993-2017 Ombudsman Services Ltd Board member, 2010-15

		Trustee board, Academy of Medical Royal Colleges Chair, 2011-15
Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.	None	None
Directorships in public and private companies including non-executive directorships (apart from IMPRESS).	None	None
Majority or controlling shareholdings in any undertaking.	None	None
Ownership of any company, business or consultancy.	None	None
Remunerated employment, consultancy, trade, profession or vocation.	Class representative in collective consumer claim against MasterCard Inc Independent Complaint Reviewer: Royal Institution of Chartered Surveyors Verita, Senior Associate Civil Aviation Authority Consumer Panel Member Independent Complaint Reviewer, Financial Conduct Authority	Gambling Commission Board member Brunel University, Lecturer in Law 1976-81 New Law Journal, Legal affairs journalist 1982-85 The Law Society, Assistant Secretary-General 1986-96 Insurance Ombudsman 1996-99 Human Fertilisation and Embryology Authority 2002-08, Board member Financial Ombudsman Service, Chief Ombudsman 1999-2009

		Office of the Health Professions Adjudicator, Chair 2009-12 Legal Ombudsman, Service Complaint Reviewer 2011-15
Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might reasonably be viewed by an independent bystander as (i) compromising IMPRESS's fairness and impartiality as a regulator; or (ii) compromising IMPRESS's openness to all news publishers on fair, reasonable and non-discriminatory terms.	None	None
Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.	None	None

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Name: David Robinson

Position: Non-Executive Director, Senior Independent Director, Treasurer, Chair of Finance and Audit Committee, Communications Committee member

Date of appointment: 01/10/15

Form last updated: 13/04/21

Interest	Current	Former (give dates)
Membership of any political party.	Liberal Democrats	None
Position of authority in a charity or voluntary body.	Trustee of The Royal Scottish National Orchestra (2020-)	Trustee of Scottish-registered charity, Changing The Chemistry (2017 - 2020) Chair of Trustees of charity, Smalls for All – 2009 to 2015; Governor of Heriot-Watt University, Edinburgh – 2009 to 2015

Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.	None	None
Directorships in public and private companies including non-executive directorships (apart from IMPRESS).	Independent Non-Executive Director, Chair of the Audit and Compliance Committee, Forester Life (UK) Ltd. (2017-)	Engage Mutual Assurance; Chairman of the Board 2010 – 2014; Fidem Life (Ukraine); member of the Supervisory Board 2010 – 2013; Money Dashboard Ltd. , NED 2008 to 2012 (Acting Chairman, 2010 to 2012) Royal London Marketing, Executive Director, 2002 to 2006 IFA Promotion Ltd. NED 1995 to 2006
Majority or controlling shareholdings in any undertaking.	None	None
Ownership of any company, business or consultancy.	Majority owner and sole consultant of consultancy, Noteperfect Limited; 100% owner of MyLife Financial Ltd. – the business has never traded	None

Remunerated employment, consultancy, trade, profession or vocation.	Membership of the Investigation Committee of the Chartered Accountants of Scotland (2015 -) Retained consultant; Community Life GmbH, Kelkheim, Germany (2015 -)	Bright Grey, CEO (2001 to 2006) Scottish Provident, UK Marketing Director, 1997 to 2001; various other roles 1971 to 1997
Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might reasonably be viewed by an independent bystander as (i) compromising IMPRESS's fairness and impartiality as a regulator; or (ii) compromising IMPRESS's openness to all news publishers on fair, reasonable and non-discriminatory terms.	None	None that I can recall
Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.	None	None that I can recall

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Name: Pam Vick

Position: Non-Executive Director, Communications Committee Chair, Finance & Audit Committee member

Date of appointment: 01/11/2019

Form last updated: 18/02/2022

Interest	Current	Former (give dates)
Membership of any political party.	None	None
Position of authority in a charity or voluntary body.	Member of Events Committee and Steering Group DEBRA charity Trustee of the British Ecological Society	Member of Advisory Board Juvenile Diabetes Foundation International charity 1993-1996
Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.	PR advisor to many small businesses, working with media owners to negotiate partnerships	Women on Boards partnership with CityAM Judge on Evening Standard creative competition July 2019

	and PR features paid and unpaid.	Advertising Director at Leo Burnett London working with Express Newspapers editorial and marketing teams on advertising campaigns for Sunday Express and Daily Star in 1980s and 1990s
Directorships in public and private companies including non-executive directorships.	Founder and Director of Caspia Consultancy Ltd	Director of StepStone ASA 1999-2002 Director, Leo Burnett Ltd from late 1980s to 1996
Majority or controlling shareholdings in any undertaking.	100% shareholder Caspia Consultancy Ltd	None
Ownership of any company, business or consultancy.	Founder and owner Caspia Consultancy Ltd	None
Remunerated employment, consultancy, trade, profession or vocation.	Paid marketing and business development consultant to various small businesses, portfolio of clients, Caspia Consultancy Ltd 2002 to date. Boardroom Advisors Ltd board advisor	Leo Burnett London Ltd, 1977 to 1996 Hertz Europe 1996 to 1999 StepStone ASA 1999 to 2002
Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might reasonably be viewed by an independent bystander as (i) compromising IMPRESS's fairness and impartiality as a regulator; or (ii) compromising IMPRESS's openness to all news	None that I am aware of	None that I am aware of

publishers on fair, reasonable and non-discriminatory terms.		
Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.	None that I am aware of	None that I am aware of

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Name: Andrea Wills

Position: Non-Executive Director, Chair of the Code Committee

Date of appointment: 01/12/17

Form last updated: 01/04/19

Interest	Current	Former (give dates)
Membership of any political party.	None	None
Position of authority in a charity or voluntary body.	A director and charity trustee of the Bristol based Learn@Multi-Academy Trust and chair of its Quality and Standards Committee.	None
Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.	None	None

Directorships in public and private companies including non-executive directorships.	None	None
Majority or controlling shareholdings in any undertaking.	None	None
Ownership of any company, business or consultancy.	None	None
Remunerated employment, consultancy, trade, profession or vocation.	Video Standards Council Rating Board - Member of Appeals Panel. April 2017 to date Sole trader – independent media consultant and trainer April 2007 to date	BBC radio & TV content producer and Chief Adviser, Editorial Policy – Jun 1981 to Mar 2006 ABC Manager Editorial Quality Training, Sydney, July 2012 to August 2013.
Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might reasonably be viewed by an independent bystander as (i) compromising IMPRESS's fairness and impartiality as a regulator; or (ii) compromising IMPRESS's openness to all news publishers on fair, reasonable and non-discriminatory terms.	None	None
Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.	None	None

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Name: Edward Procter

Position: Chief Executive Officer

Date of appointment: 09/05/16

Form last updated: 24/04/20

Interest	Current	Former (give dates)
Membership of any political party.	None	Labour Party (1992 to 1994)
Position of authority in a charity or voluntary body.	None	None
Connection with any body which contracts with or is likely to contract with IMPRESS, including but not limited to news publishers.	None	None
Directorships in public and private companies	None	Executive Director of Sport Resolutions (UK)

including non-executive directorships.		Sept 2006 to May 2016
Majority or controlling shareholdings in any undertaking.	None	None
Ownership of any company, business or consultancy.	None	None
Remunerated employment, consultancy, trade, profession or vocation.	CEO, IMPRESS Oversight Board UK Limited: Recruitment consultant	Legal Services Commission, Regional Director South East April 2005 to April 2006
Any significant public statements made on social media or in an article, blogpost, book, interview for broadcast media or any other public forum that might reasonably be viewed by an independent bystander as (i) compromising IMPRESS's fairness and impartiality as a regulator; or (ii) compromising IMPRESS's openness to all news publishers on fair, reasonable and non-discriminatory terms.	None	None
Any other interest that might reasonably be perceived by an independent bystander as directly or indirectly influencing or affecting their judgement.	None	None