



Participants' Consultation 2022 – FINAL DRAFT

In accordance with IMPRESS's financial sustainability policy and duty under our Articles of Association, we are hereby consulting participating publishers, stakeholders and the wider news publishing industry on our:

- Draft membership subscription fee schedule including member benefits;
- Our funding arrangements and financial plans;
- Draft four-year forecast for the period 1 April 2022 – 31 March 2026;
- Draft annual budget for the period 1 April 2022 – 31 March 2023.

We would be delighted to receive any feedback from participating publishers and others, not only on our financial plans but also on IMPRESS more generally. What is working for you? What is not? How can we improve things?

IMPRESS is governed by an independent Board, which has the ultimate responsibility for the organisation's strategy, including income and expenditure. When finalising the forecast, budget and tariff schedule, the Board will take all of your responses into account but may not be bound by them.

Member Subscription Fee Schedule

IMPRESS bases its annual subscription fees on the principles of fairness and affordability and Member Subscription Fees are calculated as follows:

- Publishers with turnover of up to £50,000 pay a membership fee of £50 per annum;
- Publishers with turnover above £50,000 pay a membership fee of 0.1% of their turnover per annum.
- A maximum fee of £100,000 is set for publishers with an annual turnover of £100m or more;

This ensures that fees are directly related to a publisher's turnover and provides for fees to increase or decrease in line with changes in revenue. This is intended to provide a fair, transparent and proportionate charging system. The turnover that will be used to calculate the fee is the net sales generated by the business in activities of, and related to, news publishing, which is reported to IMPRESS each year as part of our annual compliance process.

The table below shows the fee at selected annual turnover levels.

Publisher turnover	Fee (based on 0.1% of turnover)
Up to £50,000	£50
£75,000	£75
£100,000	£100
£250,000	£250
£500,000	£500
£750,000	£750
£1m	£1000
£2m	£1500
£3m	£3000
£4m	£4000
£5m	£5000
£6m	£6000
£10m	£10,000
£15m	£15,000
£20m	£20,000
£50m	£50,000
£100m or over	£100,000

Membership Benefits

The fees paid to join IMPRESS gives access to a raft of benefits for publishers including:

Approved Regulation

Membership of the only UK press regulation scheme that is recognised in law under the Royal Charter on self-regulation of the press. This guarantees that all IMPRESS regulated publishers are regulated in the public interest, whilst also protecting their freedom to publish. Readers can know that these publishers operate within a framework of high ethical standards.

A Standards Code

The IMPRESS Standards Code promotes high ethical standards of journalism and accountability. It contains ten code clauses on journalistic practices, each of them with their corresponding guidance. During the past year we have been engaged in a comprehensive review of our Standards Code to ensure that it remains relevant and fit for purpose for the future of journalism. We held two publisher workshops as part of this process and have commenced a public consultation on the revised Code and guidance. More information on the IMPRESS Standards Code can be found on www.impress.press/standards. IMPRESS is also able to give standards advice and guidance about specific issues by e-mail or telephone.

Protection from legal risks

All members of IMPRESS are protected in law from exemplary damages (sometimes called punitive damages) in any legal claims made against them. Members also benefit from an arbitration scheme which provides a quick and cost-effective alternative to expensive legal proceedings, with IMPRESS paying for the costs of the arbitrator.

Members can also get further protection by taking out insurance through our members' insurance scheme which is independently operated by Tasker insurance group and underwritten by media specialist insurer Beazley. This is not a requirement of IMPRESS membership. A separate charge is made for this service which is paid directly to Tasker.

A thriving network of innovative and independent publishers across the UK

Publishers regulated by IMPRESS join a group of independent news organisations across the UK sharing challenges and opportunities who are committed to accountable, public interest journalism.

Membership resources

Exclusive access to multimedia content, media policy updates, guidance materials, regulatory policy briefings, priority access to IMPRESS training events and webinars,

support with social media verification and opportunities to meet stakeholders in the independent news sector.

Free access to our events programme, including our annual Trust in Journalism Conference.

Draft four-year forecast, 2022-26

IMPRESS operates in a challenging and unpredictable environment. We cannot predict our costs with total accuracy but we can make educated guesses about where we will need to concentrate our resources over the coming years.

When forecasting our income and expenditure in this period, we have taken into account the cost of fulfilling our obligations as your independent regulator and the commercial pressures that you face in a highly competitive industry.

As an independent body, IMPRESS receives no funding from the Government. We are dependent on the fees paid by our members and on third party grants. Our main funder is the Independent Press Regulation Trust (IPRT), a registered charity which was established to fund ethical press regulators which meet the public interest standards of regulation that are set out in the Royal Charter on self regulation of the press. The IPRT is funded by the Alexander Mosley Charitable Trust (AMCT). Both the IPRT and AMCT are registered charities that are regulated by the Charity Commission. These funding arrangements have been scrutinised by the Press Recognition Panel to ensure that they protect the independence of IMPRESS' governance arrangements and regulatory decision making.

IMPRESS has extended its funding agreement with IPRT until October 2029. The agreement seeks to support IMPRESS to become a sustainable press regulator, standards setter and dispute resolution provider that is here for generations to come. Between April 2022 and March 2026 we will receive an average annual grant of £1.1 million from IPRT. After 2026 the funding will taper down and we are planning to generate other sources of revenue to replace it. We aim to invest the increased funding we receive from IPRT until April 2026 in activities that will help us to grow our membership and regulatory services such as marketing, service development, public engagement and fundraising. Through such investment we plan to increase the revenue that we generate from membership fees, regulatory services, individual donations and project grants from trust and foundations.

In 2022-23 we propose to set a budget of £1,222,000 which is sufficient to meet our regulatory remit and invest in our future growth and sustainability. We will use small underspends in the past two financial years to fund a planned deficit in expenditure over income.

INCOME	2022-23	2023-24	2024-25	2025-26
IPRT Grant	£1,125,000	£1,200,000	£1,110,000	£1,000,000
Membership fees	£22,000	£32,000	£55,000	£77,000
Regulatory services	£,000	£10,000	£85,000	£130,000
Project grants	£25,000	£50,000	£75,000	£100,000
Other income and donations	£2,000	£30,000	£85,000	£160,000
TOTAL INCOME	£ 1,174,000	£ 1,322,000	£ 1,410,000	£ 1,467,000

EXPENDITURE	2022-23	2023-24	2024-25	2025-26
Approved regulation	£825,000	£882,000	£903,000	£927,000
Office & Overheads	£233,000	£240,000	£252,000	£245,000
Public engagement & education	£110,000	£140,000	£190,000	£225,000
Fundraising	£54,000	£60,000	£65,000	£70,000
TOTAL EXPENDITURE	£ 1,222,000	£ 1,322,000	£ 1,410,000	£ 1,467,000

SURPLUS/DEFICIT	-£ 48,000	£ 0.00	£ 0.00	£ 0.00
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Draft annual budget, 2022-23

Our first priority is to provide a high quality of service to you, our members, your audiences and the wider public. Therefore, the bulk of our resources will be directed towards administration, governance and accreditation fees, arbitration, complaints handling and investigations.

The accreditation fees payable to the Press Recognition Panel (PRP) were set in 2017 and their level has not been reviewed since then. We have proposed to the PRP that a review should be undertaken.

We have dedicated additional resources for marketing, business development, fundraising and public engagement in the coming year to enable us to improve our services and increase our membership. We will be expanding our staff team and investing in a new website which will improve the digital services that we provide to members and the general public.

If you wish to respond to this consultation, please complete the online form and submit it no later than 5pm on Friday 29 April 2022.

- Do you have any comments about our fee schedule?
- Do you have any comments or feedback about our funding arrangements and financial plans ?
- Do you have any comments or feedback about our membership services and benefits?
- Any other comments or feedback about how IMPRESS can improve its services to members, your audiences or the wider public?